
VERIFIED DIRECT TESTIMONY OF PATRICK M. D'ENTREMONT

1 **Q1. Please state your name, business address and title.**

2 A1. My name is Patrick M. d'Entremont. I am the Director of Portfolio
3 Planning and Origination for NiSource Corporate Services Company
4 ("NCSC"). My business address is 290 W. Nationwide Blvd., Columbus,
5 Ohio 43215.

6 **Q2. On whose behalf are you submitting this direct testimony?**

7 A2. I am submitting this testimony on behalf of Northern Indiana Public
8 Service Company LLC ("NIPSCO").

9 **Q3. Please describe your educational and employment background.**

10 A3. I graduated from The University of Calgary, with a Bachelor's Degree in
11 Economics (2006). My past employment with NCSC was as a Planning
12 Analyst, Energy Supply and Optimization (2019-2021) and Manager of
13 Planning and Commercial Support (2021-2024). I accepted my current
14 position of Director of Portfolio Planning and Origination in January, 2025.
15 Prior to NCSC, I was employed at Huntington National Bank in
16 Columbus, Ohio as a Derivatives Trader and prior to that, at the TransAlta

1 Corporation in Calgary, Alberta, Canada as an Energy Trader.

2 **Q4. What are your responsibilities as Director of Portfolio Planning and**
3 **Origination?**

4 A4. As Director of Portfolio Planning and Origination, I manage counterparty
5 interactions and support negotiations to fulfill NIPSCO's long-term
6 capacity and energy needs. I am also responsible for leading the
7 commercial execution of NIPSCO's generation strategy outlined within its
8 Integrated Resource Plans ("IRP").

9 **Q5. Have you previously testified before the Indiana Utility Regulatory**
10 **Commission ("IURC") or "Commission") or any other regulatory**
11 **commission?**

12 A5. Yes. I previously testified in Cause No. 46028 in support of NIPSCO and
13 Fairbanks Solar Generation LLC's request for a modification of the
14 Commission's June 29, 2021 Order in Cause No. 45511 and in Cause No.
15 46032 in support of NIPSCO and Gibson Solar Generation LLC's request
16 for a modification of the Commission's November 22, 2023 Order in Cause
17 No. 45926. I also filed testimony before the Commission in NIPSCO's Fuel
18 Adjustment Clause ("FAC") tracker filing in Cause No. 38706 FAC 142,

1 and in Resource Adequacy Adjustment tracker filings in Cause No. 44155
2 RA XX (RA-22 through RA-24).

3 **Q6. What is the purpose of your direct testimony in this proceeding?**

4 A6. The purpose of my direct testimony is to support NIPSCO's request for the
5 issuance of a certificate of public convenience and necessity ("CPCN") to
6 purchase and acquire a 200 megawatt ("MW") wind project located in
7 Benton County, Indiana (the "Templeton Project"). The Templeton Project
8 previously was approved as a power purchase agreement ("PPA"), under
9 which NIPSCO would purchase 100% of the electrical output of the project
10 and any environmental attributes associated with the Templeton Project
11 for a period of 20-years. However, NIPSCO now plans to purchase the
12 Templeton Project pursuant to the terms of a Build Transfer Agreement
13 (the "Templeton BTA"), which are favorable.¹ My testimony (1) describes
14 how the Templeton Project remains a competitive, lower risk component
15 of NIPSCO's overall generation portfolio; (2) explains how NIPSCO has
16 incorporated the requirements of IURC General Administrative Order
17 ("GAO") 2023-04 into its direct testimony; and (3) explains how NIPSCO

¹ The Templeton BTA is attached as Confidential Attachment 1-B.

1 has addressed the guidelines for additional evidence to be provided
2 pursuant to IURC GAO 2022-01.

3 **Q7. Please summarize the other witnesses' testimony supporting NIPSCO's**
4 **request.**

5 A7. Patrick N. Augustine, Vice President in Charles River Associates' Energy
6 Practice (1) provides an overview of NIPSCO's resource planning activities
7 over the last several years, including the findings from the 2018 IRP and
8 the 2021 IRP,² and how the Templeton Project continues to fit into
9 NIPSCO's preferred plan; and (2) assesses how the costs of NIPSCO's
10 ownership of the Templeton Project compare with the cost of the original
11 project structure. Based on his levelized cost of energy ("LCOE") analysis,
12 Mr. Augustine concludes that the Templeton Project, under direct NIPSCO
13 ownership with self-monetization of federal tax credits, is a lower cost
14 source of energy for customers than the previously approved PPA.

15 Jennifer A. Harding, Vice President of Tax for NCSC, describes NIPSCO's
16 proposal to own the Templeton Project and how ownership provides value

² Integrated Resource Plan submitted to the Commission on October 31, 2018 (the "2018 IRP"). Integrated Resource Plan submitted to the Commission on November 15, 2021 (the "2021 IRP"). <https://www.nipSCO.com/our-company/about-us/regulatory-information/irp>

1 to NIPSCO's customers through the pass back of federal tax credit
2 proceeds, which NIPSCO proposes to conduct through its FAC.

3 Kevin J. Blissmer, Manager of Regulatory for NCSC, describes the
4 accounting and ratemaking treatment for the Templeton Project that are
5 necessary to allow NIPSCO to timely recover through rates the costs
6 incurred for the acquisition and operation of the Templeton Project
7 through NIPSCO's Rider 595 – Generation Costs Tracker ("GCT")
8 approved by the Commission's October 16, 2024 Order in Cause No. 45947.

9 The costs NIPSCO proposes to recover through the GCT include costs
10 associated with (1) capital investment recorded as utility plant to complete
11 the purchase of the Templeton Project; (2) deferred post-in service carrying
12 charges; (3) depreciation expense, including cost of removal, associated
13 with the Templeton Project; and (4) operations and maintenance ("O&M")
14 and property tax expenses. Mr. Blissmer demonstrates that the proposed
15 timely recovery of the Templeton Project costs through the GCT results in
16 a lower annual revenue requirement than would otherwise be produced
17 by deferring and accruing the revenue requirement elements for later
18 inclusion in a base rate case. He also describes NIPSCO's proposed
19 mechanism for sharing federal tax credit proceeds and supports NIPSCO's

request that the Commission approve initial depreciation rates for the Templeton Project.

Q8. Are you sponsoring any attachments to your testimony?

A8. Yes. I am sponsoring the following attachments, all of which were prepared by me or under my direction and supervision.

Attachment 1-A	Verified Petition
Confidential Attachment 1-B	Build Transfer Agreement by and between Northern Indiana Public Service Company LLC, as Purchaser and Templeton Wind Holdings, LLC, as Seller
Attachment 1-C	Generation Portfolio Update
Attachment 1-D	GAO 2022-01 Requirements
Attachment 1-E	MISO Qualitative Assessment

GENERATION TRANSITION AND CUSTOMER BENEFITS

Q9. Is NIPSCO continuing its generation transition as set forth in its 2018 IRP and 2021 IRP?

A9. Yes. NIPSCO continues to diversify its resources as it retires its coal-fired generation to include wind, solar, storage, flexible thermal generation resources/emerging technologies, and market purchases/capacity. Units 14 and 15 at NIPSCO's R.M. Schahfer Generating Station ("Schahfer") were retired in October 2021. Schahfer Units 17 and 18 will retire on December

1 31, 2025. Unit 12 at Michigan City Generating Station is planned to retire
2 at the end of 2028.

3 In 2022, NIPSCO issued two separate requests for proposals ("RFP"): (1)
4 an RFP for renewable facilities and energy storage options (the "2022 All-
5 Source RFP"), and (2) an RFP targeted to procure a resource(s) intended to
6 provide peaking, black start capabilities, and other reliability attributes
7 (the "Schahfer Development RFP") (together, the "2022 RFPs"). The 2022
8 RFPs included the latest information associated with the Midcontinent
9 Independent System Operator, Inc.'s ("MISO") seasonal resource
10 adequacy construct, Inflation Reduction Act ("IRA") tax credits, and
11 resource costs. The 2022 RFPs also provided information related to the
12 latest costs of storage resources and the viability of alternative natural gas
13 peaker options.

14 As explained in greater detail by NIPSCO Witness Augustine, NIPSCO
15 performed a portfolio analysis in 2023 ("the 2023 portfolio analysis"),³
16 incorporating certain changes to NIPSCO's resources and other market

³ See Confidential Attachment 2-B to the Verified Direct Testimony of Patrick N. Augustine for a summary of the key inputs and outputs associated with the 2023 portfolio analysis.

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1 conditions relative to the 2021 IRP, including (1) near-term adjustments to
2 NIPSCO's generation resource portfolio to reflect updated project costs,
3 PPA prices, and online dates for new solar and solar plus storage resources
4 and the retirement date for Schahfer Units 17 and 18, as well as plant
5 capacity ratings and other operation parameters for NIPSCO existing
6 resources; (2) latest information related to MISO's seasonal resource
7 adequacy construct; (3) updated commodity price inputs; (4) resource
8 costs based on the 2022 RFPs; and (5) clean energy and storage tax credit
9 extensions as outlined in the IRA.

10 **Q10. Is NIPSCO confident that it will be able to reliably and affordably serve**
11 **its customers during and upon completion of its generation transition?**

12 A10. Yes. NIPSCO's 2021 IRP, which included an expanded analysis of
13 reliability, affirmed the early retirement of coal is still cost-effective for
14 customers and replacement resources containing a diverse, flexible, and
15 scalable mix of incremental resources support continued reliability and
16 resiliency consistent with the Five Pillars codified in Ind. Code § 8-1-2-0.6.
17 As outlined by NIPSCO Witness Augustine, and as noted above, the 2023
18 portfolio analysis incorporates market shifts and changes that have
19 occurred since the 2021 IRP. These changes point to the increased need for

1 capacity advantaged resources in the portfolio. As demonstrated in the
2 2022 RFPs, wind has improved economics given the IRA and MISO market
3 rules, as tax credits were extended for wind, and additional capacity is
4 needed in the winter season.

5 NIPSCO is effectuating the generation transition by reviewing at-risk
6 projects that may no longer be viable or suitable given MISO rule changes,
7 pursuing solar and wind PPAs, seeking cost and structure updates that
8 take advantage of IRA incentives, and building a gas peaker. NIPSCO is
9 confident that, through its own resource planning efforts and its
10 participation in the MISO market, it will be able to serve all its customers
11 reliably and affordably during and upon completion of its generation
12 transition.

CONVERSION OF THE TEMPLETON PPA TO TEMPLETON BTA

13 **Q11. Please describe the Templeton PPA previously approved by the**
14 **Commission.**

15 A11. In its September 13, 2023 Order in Cause No. 45887 (the "45887 Order"),
16 the Commission approved, among other things, NIPSCO's request for
17 approval of a Wind Energy Purchase Agreement between NIPSCO and
18 Templeton Wind Energy Center, LLC dated February 13, 2023

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1 ("Templeton Wind PPA") for the Templeton Project. The Templeton Wind
2 PPA provided NIPSCO with 100% of the electrical output of the project
3 and any environmental attributes associated with the project at a fixed
4 price of \$ [REDACTED] / MWh (with no adjustments) over a term of 20 years
5 beginning at the Commercial Operation Date. The price included the
6 renewable energy, accredited capacity, generation benefits, and all
7 renewable energy credits associated with the energy generated by the
8 Templeton Project and metered at the point of delivery. Under the
9 Templeton Wind PPA, Templeton Wind Energy Center, LLC would have
10 received and retained existing and future tax credits or tax benefits as the
11 owner and operator of the wind energy project.

12 In its 45887 Order, the Commission concluded that NIPSCO's 2021 IRP
13 "did not rely on a single set of assumptions that could later be invalidated
14 by evolving market conditions" and that its process was "robust and well
15 developed." 45887 Order at 19. The Commission further observed that
16 NIPSCO's 2023 portfolio analysis "accounted for NIPSCO's ongoing
17 resource planning and other market conditions and developments that
18 have occurred since the 2021 IRP was completed, including, among other
19 things, updated pricing from NIPSCO's 2022 All-Source RFP, changes to

1 the MISO resource adequacy construct, commodity pricing updates, and
2 changes to federal law.” *Id.* The Commission found that the Templeton
3 Wind PPA “will fit well into and diversify NIPSCO’s overall generation
4 portfolio” and “ensure the generation portfolio has adequate energy and
5 capacity.” *Id.* The Commission found that the energy to be obtained from
6 the Templeton Wind Project is “reasonably priced compared to other
7 alternatives and provides material benefits” and that the pricing for the
8 Templeton Wind PPA “is similar to the renewable resource tranches
9 evaluated in NIPSCO’s 2021 IRP and is thus consistent with the Short-
10 Term Action Plan.” *Id.* at 18-19. Accordingly, in the 45887 Order, the
11 Commission approved the Templeton Wind PPA, found the Templeton
12 Wind Project to be a clean energy project, and authorized NIPSCO to
13 recover all the purchased power costs over the full term of the Templeton
14 Wind PPA through the FAC. *Id.* at 20.

15 **Q12. Why is NIPSCO seeking a BTA structure for the Templeton Project as**
16 **opposed to continuing to develop the project under the already**
17 **approved Templeton Wind PPA?**

18 A12. NextEra Energy Resources, LLC (“NextEra”), the developer of the
19 Templeton Wind Project, advised NIPSCO that it was willing to sell the

1 Templeton Project to NIPSCO upon its completion at terms that NIPSCO
2 considered favorable, even in comparison to the terms of the Templeton
3 Wind PPA. As NIPSCO Witness Augustine discusses in his testimony,
4 NIPSCO determined that the LCOE for the Templeton Project under the
5 BTA structure would be favorable as compared to the LCOE under the
6 PPA structure. As the parties were negotiating the BTA, they agreed to
7 terminate the PPA because changed circumstances meant the terms of the
8 PPA were no longer viable even as a backstop. Nothing has changed since
9 the issuance of the Commission's 45887 Order that would alter the findings
10 that the Templeton Project "will fit well into and diversify NIPSCO's
11 overall generation portfolio" and "ensure the generation portfolio has
12 adequate energy and capacity." 45887 Order at 19.

13 **Q13. Please describe the Templeton Project under the Templeton BTA.**

14 A13. The Templeton Project itself is not changing. Under the Templeton BTA,
15 Templeton Wind Holdings, LLC ("Seller"), through a special purpose
16 entity known as Templeton Wind Energy Center, LLC (the Templeton
17 ProjectCo), will develop a wind project that includes construction of 71
18 wind turbines in Benton County, Indiana (utilizing MISO interconnect
19 request J2509), having an aggregate nameplate capacity of approximately

1 200 MW.⁴ The Templeton Project is expected to achieve commercial
2 operation by mid-2027 and have an estimated purchase price of \$
3 [REDACTED].

4 **Q14. Why does ownership of the Templeton Project benefit customers?**

5 A14. As supported by NIPSCO Witness Augustine, the price offered by NextEra
6 for purchase of the Templeton Project results in an LCOE that is favorable
7 to the LCOE under the former PPA structure. The 2021 IRP supports
8 adding wind to NIPSCO's generation portfolio as part of its least-cost
9 resource portfolio, and NIPSCO's initial decision to contract for the wind
10 energy produced by the Templeton Project through a PPA was informed
11 by the 2022 All-Source RFP. In addition, two recent developments make
12 wind energy an attractive option for NIPSCO's generation portfolio: (1)
13 approval of MISO's seasonal resource adequacy construct, in which load
14 serving entities must meet different reserve margin targets for each of the
15 four seasons with varying capacity accreditation by season, and (2) the
16 expansion of available federal tax credits to wind resources through the

⁴ The point of interconnection is Duke Energy Indiana's Westwood 345kV Substation. To facilitate the project's interconnection, less than \$10 million in upgrades are required, the cost of which are included in the purchase price.

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1 passage of the IRA. The seasonal resource adequacy construct makes wind
2 resources an important component of winter reserve margin planning,
3 particularly as compared to solar resources. The expansion of IRA federal
4 tax credits has improved the economics of wind resources making wind
5 projects more competitive, which is reflected in the LCOE analysis
6 sponsored by NIPSCO Witness Augustine. These two factors, and the fact
7 that wind resources provide energy without fuel costs, make it prudent to
8 negotiate competitive terms under which NIPSCO would purchase the
9 Templeton Project.

10 In addition, wind resources are scarce within Indiana and a demand-
11 supply imbalance could emerge as other nearby utilities move toward
12 implementing wind resources, thereby possibly intensifying the pricing
13 for wind projects. If NIPSCO were to pass on the Templeton Project, it
14 could be exposed to higher pricing for wind projects due to a competitive
15 market – especially starting the 3.5+ year process all over again while
16 navigating the MISO Generator Interconnection Queue process that
17 continues to be delayed.

1 **Q15. Is the cost to customers under the Templeton BTA structure comparable**
2 **to the cost to customers under the former Templeton Wind PPA?**

3 A15. Yes. As I discuss below, the cost to customers under the two structures is
4 comparable and as NIPSCO Witness Augustine notes, the LCOE under the
5 Templeton BTA structure is lower than the LCOE under the former PPA
6 structure.

7 **Q16. Does the Templeton BTA include any risk mitigation provisions to**
8 **protect the viability of the Templeton Project?**

9 A16. Yes. The Templeton BTA includes several risk mitigation provisions to
10 address [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED] [REDACTED]

1 [REDACTED]

2 [REDACTED].

3 **Q17. Are there other benefits of a direct ownership structure as opposed to a**
4 **PPA structure?**

5 A17. Yes. A direct ownership structure ensures the asset will be available to
6 meet the needs of NIPSCO's customers over a longer term as compared to
7 PPAs, which generally have terms of ten to twenty years. As a part of the
8 implementation of NIPSCO's generation transition plan, NIPSCO has long
9 valued the benefits of a diverse portfolio and the risk reduction a diverse
10 portfolio affords. Diversification in the portfolio is more than
11 technological diversification. Accordingly, NIPSCO has incorporated
12 other types of diversification into its portfolio, including the use of
13 different transaction structures via its mix of PPAs, joint ventures, and
14 direct ownership to facilitate the generation transition. NIPSCO believes
15 it is prudent to diversify its investments in renewable generation resources
16 to manage risks, ensure that customers benefit from the portfolio as a
17 whole, and to ensure NIPSCO has optionality to quickly address changing
18 circumstances. A map showing NIPSCO's current generation portfolio
19 and the diverse structures for those generation assets is attached hereto as

1 Attachment 1-C.

2 As further discussed by NIPSCO Witness Harding, a direct ownership
3 structure can drive value and financial benefits for NIPSCO customers
4 through the realization of the Production Tax Credit ("PTC") and
5 optionality with regards to self-utilization or transfer of these tax credits.
6 Self-utilization and/or direct transfer of tax credits afforded under the IRA
7 can provide an additional layer of diversification NIPSCO can apply to its
8 portfolio. NIPSCO has in-service projects that utilize the Investment Tax
9 Credit ("ITC") through both a joint venture / tax equity partner structure
10 and through direct ownership.⁵

11 In addition to those benefits, a direct ownership structure provides
12 operational management benefits to NIPSCO. For example, under a PPA
13 structure, the operation and management of the facility is completely
14 controlled by a third party. Similarly, under a tax equity partnership,

⁵ NIPSCO brought Indiana Crossroads Solar (200 MW) and Dunns Bridge I (265 MW) solar projects and Rosewater Wind (100 MW) and Crossroads Wind (300 MW) wind projects online. Because NIPSCO used the joint venture and tax equity structure to pursue those projects, customers benefit from the associated ITCs. In 2024, NIPSCO brought the Cavalry Solar Plus Battery (200 MW + 45 MW) project online. Because NIPSCO used the direct ownership structure to pursue this project, customers benefit from the associated ITCs and PTCs.

1 NIPSCO is required to have general operational decisions approved by the
2 partner. Under a direct ownership structure, the operational decisions and
3 asset management are governed by NIPSCO's operational and risk
4 management practices. By simplifying the ownership structure, NIPSCO
5 can allocate more time and resources to initiatives that ultimately benefit
6 its customers.

7 **Q18. How does the Templeton BTA leverage the benefits of PTCs afforded**
8 **by the IRA?**

9 A18. By extending PTCs for wind production facilities and allowing for the
10 transferability of credits, the IRA has done two important things: (1)
11 acknowledged the continued benefits of wind production and incentivized
12 further development of viable projects, and (2) created a tax credit market
13 that can be accessed by many investors with different investment
14 appetites, which is beneficial to all parties involved. The Templeton
15 Project is well positioned to provide customers the benefit of realization of
16 PTCs over a ten-year period. The expected capacity factor for the
17 Templeton Project is approximately 36.4%. This expected capacity factor
18 is a reasonable assumption when considering 10 years' worth of
19 production. As NIPSCO Witness Harding explains, the value of PTCs is

1 expected to grow each year due to the annual inflation adjustment factor,
2 and NIPSCO proposes to flow the PTC benefits to customers over a 10-
3 year period.

4 **Q19. Is NIPSCO's approach of evaluating its generation projects on a**
5 **portfolio basis and making modifications as appropriate to reduce risks**
6 **to customers consistent with prior Commission directives?**

7 A19. Yes. The Commission has consistently stressed the importance of a
8 balanced and diverse mix of generating resources. For instance, in *S. Ind.*
9 *Gas & Elec. Co.*, Cause No. 45501, the Commission noted: "a balanced and
10 diversified portfolio offers risk mitigation by helping to protect customers
11 from marketplace risks, such as increases in fuel costs, or if the future
12 differs from the IRP reference case scenario." 45501 Order at 4. In
13 discussing the factors CenterPoint Energy Indiana South utilized in
14 developing its preferred generation portfolio in its 2019/2020 IRP,
15 including the use of a diverse mix of generating resources and ownership
16 structures, the Commission stated "[t]hese factors are designed to
17 diversify CenterPoint's portfolio and to provide off ramps that enable
18 Petitioner to react to changing circumstances and make appropriate
19 changes in its resources." *Id.* at 29. The Commission supported the

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1 evaluation of projects on a portfolio basis and highlighted diversity in
2 generation projects, stating “[f]uel diversity and the addition of local
3 renewable resources are important in helping insulate electric utilities and
4 their customers from contingencies such as fuel price fluctuations and
5 changes in regulatory practices, including environmental regulations, that
6 can impact the cost of a particular fuel.” *Id.* at 31, 33. The Commission
7 additionally noted the separate and diverse benefits of BTA ownership
8 structures and PPA ownership structures and stated that risk can be
9 mitigated through “diversification and [the] use of an economic mix of
10 resources that provides flexibility.” *Id.* at 32, 34. Taking advantage of the
11 PTC for some projects and the ITC for others is consistent with the
12 foregoing findings and will reduce customers’ exposure to market
13 uncertainties and risks.

14 Moreover, in *S. Ind. Gas & Elec. Co.*, Cause No. 45052, the Commission
15 found: “[a] key consideration in long term resource planning is the need to
16 retain maximum flexibility in utility resource decisions to minimize risks.”
17 45052 Order at 24. The Commission noted “[t]he credibility of the analysis
18 is critical to the efforts of Indiana utilities to maintain as many options as
19 possible, which includes off ramps, to react quickly to changing

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1 circumstances and make appropriate changes in the resources." *Id.*

2 Consistent with the foregoing findings, NIPSCO developed a diverse
3 generation portfolio made up of resources that has preserved optionality
4 and allowed NIPSCO to react quickly to changing circumstances. That
5 portfolio structure allowed NIPSCO to identify an opportunity to modify
6 the structure of the Templeton Project while retaining a joint venture or
7 PPA structure for other projects. Full ownership of the Templeton Project
8 allows NIPSCO to realize all of the environmental attributes associated
9 with the Project, which it would not have access to under a PPA. Direct
10 ownership also provides greater flexibility and autonomy than under a
11 joint venture ownership structure, which would require contractual
12 commitments to a tax equity partner.

13 **Q20. Is the Templeton Project, under a direct ownership structure and the**
14 **terms of the Templeton BTA, reasonable and necessary?**

15 A20. Yes. The Commission's findings in the 45887 Order with respect to the
16 necessity of the Templeton Project and its consistency with the 2018 IRP
17 and Short-Term Action Plan remain true, notwithstanding the
18 modifications to the ownership structure. As the Commission found in its
19 45887 Order, the Templeton Project is consistent with the 2021 IRP. 45887

1 Order at 19. The ownership structure does not change that finding, or the
2 findings that Templeton's energy and capacity are reasonable and
3 necessary additions to NIPSCO's portfolio of generating resources to meet
4 the need for electricity within NIPSCO's service area while also mitigating
5 the risk through the diversification and use of an economic mix of
6 resources that provides flexibility. *See id.* at 20. Additionally, the
7 Commission found that NIPSCO's LCOE analysis showed acquiring the
8 wind energy from the Templeton Project was "superior to other options
9 available to NIPSCO." *Id.* at 19. The change in ownership structure serves
10 to reduce the LCOE, such that the Templeton BTA is a reasonable, highly
11 economic choice to serve the energy and capacity needs of NIPSCO's
12 customers. Moreover, NIPSCO believes wholly owning the Templeton
13 Project and passing the benefit of wind PTCs to customers through the
14 FAC will mitigate the impact of the price increases on customer rates.
15 Commission approval of the relief requested herein is in the public
16 interest, will enhance or maintain the reliability and efficiency of service
17 provided by NIPSCO, and is otherwise consistent with Ind. Code § 8-1-8.8-
18 11.

REQUIREMENTS UNDER IND. CODE § 8-1-2-0.6

1 **Q21. Please describe Ind. Code § 8-1-2-0.6.**

2 A21. Ind. Code § 8-1-2-0.6 is the codification of the Five Pillars (reliability,
3 affordability, resiliency, stability, and environmental stability)
4 recommended by the 21st Century Energy Policy Development Task Force
5 ("Task Force") in its November 2020 Final Report. The Task Force
6 recommended these Pillars serve as the lens through which policy
7 decisions about Indiana's generation resource mix should be made. IURC
8 GAO 2023-04 specified the proceedings in which case-in-chief testimony
9 on the Five Pillars within Ind. Code § 8-1-2-0.6 is encouraged. An index
10 identifying the NIPSCO witness and testimony page number that
11 addresses each of the Five Pillars is attached to the Verified Petition as
12 Attachment B.

13 **Q22. Is NIPSCO's request in this Cause consistent with the Five Pillars**
14 **codified in Ind. Code § 8-1-2-0.6?**

15 A22. Yes. Ind. Code § 8-1-2-0.6(1) defines reliability in two ways: (a) the
16 adequacy of electric utility service, including the ability of the electric
17 system to supply the aggregate electrical demand and energy
18 requirements of end use customers at all times, taking scheduled and

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1 reasonably expected unscheduled outages into account, and (b) the
2 operating reliability of the electric system, including the ability of the
3 electric system to withstand sudden disturbances such as electric short
4 circuits or unanticipated loss of system components. I, along with NIPSCO
5 Witness Augustine, address the reliability attributes of the Templeton
6 Project and the Preferred Portfolio as a whole. Overall, as part of
7 NIPSCO's preferred generation portfolio, the Templeton Project will
8 address both reliability concepts by providing capacity to meet the
9 planning reserve requirements of MISO's seasonal resource adequacy
10 construct and will further enhance the ability of the system to withstand
11 sudden disturbances.

12 NIPSCO Witness Augustine also addresses NIPSCO's 2021 IRP and
13 Preferred Portfolio, which reflect a diverse resource mix to meet current
14 and future load and reserve margin requirements. The Preferred Portfolio
15 enhances the resiliency and stability of NIPSCO's system by minimizing
16 the risk of sustained disruptions. NIPSCO's solar assets are well-suited to
17 provide stable energy in the summer when usage is at its highest,
18 NIPSCO's thermal resources will provide dispatchability to meet winter
19 load, and NIPSCO's wind resources provide capacity benefits throughout

1 the four seasons, including a higher accreditation in the winter than solar.

2 This balanced approach will ensure NIPSCO continues to meet its
3 planning reserve margin requirements in all four seasons.

4 The Preferred Portfolio was among the most affordable for customers,
5 particularly in light of the supply chain and solar tariff-related challenges
6 the industry has faced in recent years. The Preferred Portfolio is also
7 environmentally sustainable because it reduces lifecycle greenhouse gas
8 emissions, as compared to continued operation of NIPSCO's coal-fired
9 fleet and provides the flexibility to adapt to future environmental
10 regulations or upward shifts in fuel prices relative to other reference case
11 assumptions.

12 Although the Templeton Project itself is not directly aimed at resiliency,
13 the Short-Term Action Plan coming out of NIPSCO's 2021 IRP, of which
14 the Templeton Project is a part, is aimed at ensuring the overall resiliency
15 of NIPSCO's electric operations. As part of this portfolio, the Templeton
16 Project assists NIPSCO in ensuring both reliability and resiliency as it
17 serves its electric customers.

CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

1 **Q23. Is the purchase and ownership of the Templeton Project consistent with**
2 **NIPSCO's 2018 and 2021 IRPs and Short-Term Action Plan?**

3 A23. Yes. As mentioned above, the relief sought in this case does not change
4 the Commission's findings in its 45887 Order. As explained by NIPSCO
5 Witness Augustine, the Templeton Project remains consistent with the
6 2018 and 2021 IRPs and Short-Term Action Plan.

7 **Q24. Ind. Code § 8-1-8.5-5(b)(2) requires that the proposed construction,**
8 **purchase, or lease be consistent with either the Commission's analysis**
9 **for expansion of electric generating capacity or with a utility specific**
10 **proposal. Is the purchase and ownership of the Templeton Project**
11 **consistent with Ind. Code § 8-1-8.5-5(b)(2)?**

12 A24. Yes. NIPSCO's purchase and ownership of the Templeton Project in this
13 proceeding is consistent with its 2018 and 2021 IRPs. Within its IRP
14 process, as further discussed by NIPSCO Witness Augustine, NIPSCO
15 considered many different generation resources for modeling, including
16 natural gas, coal, wind, solar, battery storage, and demand response.
17 NIPSCO engaged and considered stakeholder input throughout its IRP
18 process. NIPSCO utilized an array of best practices, including basing

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1 model inputs on the results of an RFP; transparent inclusion of input
2 forecasts, outputs, and assumptions; a thorough description of most
3 aspects of screening and portfolio selection; and fair consideration of a
4 wide range of supply-side alternatives without arbitrary limitations on the
5 amount of those resources that can be selected or unsupported cost
6 additions.

7 **Q25. Is NIPSCO requesting ongoing review of the construction of the**
8 **Templeton Project pursuant to Ind. Code § 8-1-8.5-6?**

9 A25. Yes. NextEra, as the developer for the Templeton Project, is already subject
10 to quarterly construction reporting pursuant to Paragraph 7 in the
11 Commission's January 17, 2024 Order in Cause No. 45952 (Templeton
12 Wind Project) through commercial operation of the facility. These
13 quarterly reports include many project and construction details, including,
14 but not limited to, achievement of construction milestones, date of
15 commercial operation, and, when commercial operation is achieved, the
16 nameplate capacity of each facility. To satisfy ongoing review, NIPSCO
17 will submit a report in this Cause within sixty days after the Templeton
18 Project is placed in service, summarizing information related to the
19 Templeton Project, including the actual total purchase price. NIPSCO will

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1 file a separate cause pursuant to Ind. Code § 8-1-2-72 seeking to modify the
2 best estimates approved in this Cause to the extent approval of an increase
3 to the cost of the facilities above the best estimate is needed.

4 **Q26. Does the public convenience and necessity require or will require the**
5 **construction, purchase, and ownership of the Templeton Project?**

6 A26. Yes. The Templeton Project is the result of a thorough RFP process and a
7 quantitative and qualitative evaluation of the RFP responses. As the
8 Commission found in its 45887 Order, the energy provided through the
9 Templeton Project is a reasonable and necessary addition to NIPSCO's
10 portfolio of generating resources necessary to meet the need for electricity
11 within NIPSCO's service area, while also mitigating the risk through the
12 diversification and use of an economic mix of capacity resources that
13 provides flexibility.

GUIDELINES ESTABLISHED UNDER GAO 2022-01

14 **Q27. Are you familiar with GAO 2022-01?**

15 A27. Yes. GAO 2022-01 provides guidelines for additional evidence to be
16 provided in connection with certain petitions regarding electric generation
17 under Ind. Code chs. 8-1-8.5 and 8-1-8.8. The required information as it
18 pertains to NIPSCO's request for approval under Ind. Code ch. 8-1-8.8 in
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1 this Cause is provided in Attachment 1-D. Attachment 1-E is the Affidavit
2 of Andy Witmeier, Director of Resource Utilization for MISO, providing a
3 qualitative assessment provided by MISO regarding the new generation,
4 including NIPSCO's request to MISO (Exhibit 1 to the Affidavit).

CONCLUSION

5 **Q28. Does this conclude your prefled direct testimony?**

6 A28. Yes.

VERIFICATION

I, Patrick M. d'Entremont, Director of Portfolio Planning and Origination for NiSource Corporate Services Company, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "P. d'Entremont", written over a horizontal line.

Patrick M.

d'Entremont Date:

February 24, 2025

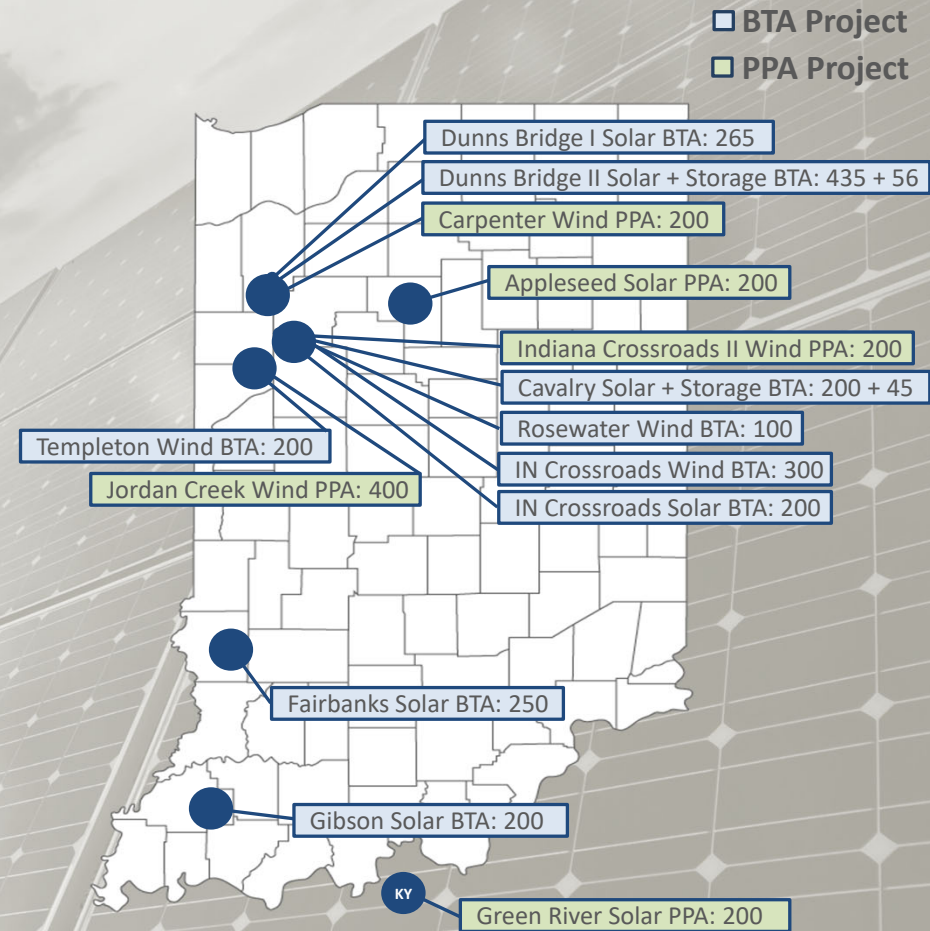
Attachment 1-A
[Verified Petition - Not duplicated herein]

Confidential Attachment 1-B (Redacted)

Current Portfolio Update

BTA Projects	Installed Capacity (MW)	Structure	Estimated In Service	Status
Rosewater Wind	100	JV	2020	Complete
Indiana Crossroads Wind	300	JV	2021	Complete
Dunn's Bridge I Solar	265	JV	2Q23	Complete
Crossroads Solar	200	JV	2Q23	Complete
Transmission Projects	---	Owned	2Q23	Complete
Cavalry Solar + Storage	200 + 45	Owned	2Q24	Complete
Dunn's Bridge II Solar + Storage	435 + 56	Owned	1Q25	Construction
Fairbanks Solar	250	Owned	2Q25	Construction
Gibson Solar	200	Owned	2Q-3Q25	Construction
Templeton Wind	200	Owner	2Q27	Construction

PPA Projects	Installed Capacity (MW)	Estimated In Service	Status
Jordan Creek Wind	400	2020	Complete
Crossroads II Wind	200	2023	Complete
Carpenter Wind	200	2025	Construction
Appleseed Solar	200	2025	Construction
Green River Solar	200	2025	Construction



We exist to deliver safe, reliable energy that drives value to our customers

GAO 2022-01 Information

GAO 2022-01 Guideline	Witness	Templeton BTA
The name of the RTO to which the generation will be connected.	D'Entremont	The Templeton Project will be connected to the Duke Energy Indiana Westwood 345kV Substation, which interconnects with the Midwest Independent System Operator, Inc. ("MISO") transmission system. To facilitate the project's interconnection, less than \$10 million in upgrades are required, the cost of which are included in the purchase price. See Q/A 13.
A description of the new generation's anticipated impact on the submitting utility's resource adequacy and reliability.	D'Entremont	The Templeton Project will help fulfill NIPSCO's capacity needs identified in its 2021 IRP, which was confirmed by the results of NIPSCO's 2023 portfolio analysis. See Q/A 11. The Templeton Project is expected to contribute to meeting resource adequacy requirements and contribute to the overall reliability of NIPSCO's system. See Q/A 14.
An explanation regarding whether the generation is required to be in the RTO's interconnection queue and, if so, its status in the queue.	D'Entremont	The Generation Interconnection Agreement ("GIA") request for the Templeton Project entered the MISO Queue in September 2022 and is currently in the Definitive Planning Phase 1. The GIA is expected to be executed by December 2025. See Q/A 13.
A description of the generation's expected capacity factors, dispatchability, and accreditation characteristics.	D'Entremont	<p>The Templeton Project will provide 200 MW of nameplate capacity ("ICAP"), at an expected annual capacity factor of 36.4%. See Q/A 18.</p> <p>Calculation of an accredited unforced capacity ("UCAP") for the facility is the product of the effective nameplate capacity and the applicable capacity credit factor.</p> <p>For wind resources, MISO will award accredited capacity factors for the Summer, Fall, Winter, and Spring seasons derived from the historical performance of the wind facility.</p> <p>The Templeton Project is expected to provide approximately 42 MW, 61 MW, 58 MW and 51 MW of UCAP accredited capacity in the Summer, Fall, Winter and Spring MISO planning seasons, respectively.</p>

GAO 2022-01 Guideline	Witness	Templeton BTA
		<p>The Templeton Project will be a variable resource.</p> <p>Please see Attachment 1-E for the Affidavit of Andy Witmeier, Director of Resource Utilization for MISO, providing a qualitative assessment provided by MISO regarding the new generation, including NIPSCO's request to MISO (Exhibit 1 to the Affidavit).</p>
A description of how the generation is expected to perform at the relevant RTO's peak pursuant to its capacity construct.	D'Entremont	As noted above, the Templeton Project is expected to provide approximately 42 MW, 61 MW, 58 MW and 51 MW of UCAP accredited capacity in the Summer, Fall, Winter, and Spring MISO planning seasons, respectively.

AFFIDAVIT OF ANDREW WITMEIER

I. INTRODUCTION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND RELATIONSHIP TO THE MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC. (“MISO”).

A. My name is Andrew Witmeier. I am the Director of Resource Utilization for the Midcontinent Independent System Operator, Inc. (“MISO”). My business address is: 720 City Center Drive, Carmel, IN 46032-7574.

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I joined MISO in 2003 after graduating from Purdue University with a Bachelor’s degree in Electrical Engineering. I spent the first 17 years of my career in various positions in MISO Operations. During that time I worked as a North American Reliability Corporation (“NERC”) certified system operator in scheduling, engineering, and as a reliability coordinator. I also led several groups within MISO Operations as a manager in engineering, reliability coordination, and seams administration. In January 2020, I was appointed to my current position.

Q. PLEASE DESCRIBE YOUR JOB RESPONSIBILITIES WITH MISO AS THEY RELATE TO THIS FILING.

A. As the Director of Resource Utilization, I am responsible for the administration of MISO’s Generator Interconnection Procedures (“GIP”), which are set forth in Attachment X of MISO’s Open Access Transmission, Energy and Operating Reserve Markets Tariff (“Tariff” or “MISO Tariff”). I oversee MISO’s generation interconnection queue,

1 including the conduct of studies, and the negotiation and execution of Generator
2 Interconnection Agreements.

3 **II. PURPOSE OF THIS AFFIDAVIT**

4 **Q. ARE YOU SUBMITTING THIS AFFIDAVIT ON BEHALF OF MISO?**

5 A. Yes.

6 **Q. WHAT IS THE PURPOSE OF YOUR AFFIDAVIT?**

7 A. The purpose of my affidavit is to provide information requested by the Northern Indiana
8 Public Service Company LLC (“NIPSCO”) to enable its compliance with Indiana Utility
9 Regulatory Commission General Administrative Order 2022-01 (“the GAO”).

10 **Q. PLEASE DESCRIBE NIPSCO’S REQUEST FOR INFORMATION.**

11 A. NIPSCO requested that MISO enable NIPSCO’s compliance with the GAO by providing
12 a qualitative assessment regarding new generation. The request referenced a potential
13 project (“the Project”) that has been submitted into the MISO Generator Interconnection
14 Queue (“the Queue”). The Project was described in the Interconnection Request¹ as a
15 205.86 MW wind generating facility, consisting of 73 GE 2.82 MW wind turbines, each
16 rated at 3.13 MVA/2.82 MW, one main power transformer, and a lead line to connect to
17 the point of interconnection at Westwood 345 kV Substation (“Westwood”). The
18 Interconnection Request for the Project was entered in the DPP 2022 Cycle, in the Central
19 study group, with a Commercial Operation Date of 12/31/2025. NIPSCO states the Project
20 is now projected to have a Commercial Operation Date (“COD”) in the second quarter of
21 2027.

22 **III. NIPSCO REQUEST FOR INFORMATION**

¹ Tariff Attachment X, Section 1 (Definitions).

1 **Q. CAN MISO GIVE A GENERAL ASSESSMENT OF THE PROJECT?**

2 A. At this time, MISO can only give a generalized assessment of the Project as the studies
3 associated with its Interconnection Request have not been completed.²

4 **Q. DOES MISO NEED TO DO A FULL ASSESSMENT OF THE PROJECT AT THIS**
5 **POINT IN THE IURC PROCESS?**

6 A. No. It is MISO's understanding that for the CPCN proceeding NIPSCO does not need to
7 present the same level of details that are required for the MISO Interconnection process.
8 The GAO requirement is fairly new to MISO. We have historically only reviewed the
9 Interconnection Request and studied how it impacts the grid.

10 **Q. WHAT WOULD MISO NEED TO PROVIDE A FULL ASSESSMENT OF THE**
11 **PROJECT?**

12 A. MISO's Tariff requires MISO to make determinations about the impacts of projects based
13 on specific details in Interconnection Requests. Under the Tariff, an Interconnection
14 Request contains relevant information such as the requested level of Interconnection
15 Service, generating facility data, and short circuit and dynamic modeling information. A
16 valid Interconnection Request for a new generating facility has entered the Definitive
17 Planning Phase, a three phase study process.³ As of the date of this affidavit, MISO has
18 received a valid⁴ Interconnection Request for the Project to enter the Definitive Planning

² As of October 9, 2024, the Central study group for the DPP 2022 Cycle is currently in DPP Phase I. The most recent MISO Definitive Planning Phase Schedule is available at https://www.misoenergy.org/planning/resource-utilization/GI_Queue/. The Preliminary System Impact Study, the first study in the Definitive Planning Phase, will not be available until completion of DPP Phase I.

³ Tariff Attachment X, Section 7.2.

⁴ Tariff Attachment X, Section 3.3.

1 Phase, but has not completed any of the applicable studies. Therefore, MISO cannot make
2 specific statements regarding the impact of the project.

3 **Q. WHAT IS MISO'S GENERAL ASSESSMENT OF THE PROJECT?**

4 A. From a generator interconnection process perspective, my general assessment is that
5 submitting an Interconnection Request to be studied by MISO to be provided
6 Interconnection Service is the appropriate method of connecting new generation on the
7 MISO transmission system. NIPSCO states the Project is projected to have a COD in the
8 second quarter of 2027. The ability for the Project to meet the COD depends on the date
9 that an Interconnection Request is submitted for the Project, the date of completion of the
10 Definitive Planning Phase, and the proposed development schedule.

11 **Q. HOW DOES MISO EVALUATE WIND GENERATION IN ITS EVALUATION OF**
12 **INTERCONNECTION REQUESTS?**

13 A. MISO's Generator Interconnection Procedures are fuel and technology neutral, and MISO
14 does not evaluate a project more or less preferably than another based on fuel type. This
15 said, MISO acknowledges that the attributes of Generating Facilities that are proposed by
16 Interconnection Customers can positively or negatively impact grid reliability and that both
17 Interconnection Customers and regulators may consider how specific Generating Facilities
18 may impact overall grid reliability. MISO simply notes that as the IURC considers the
19 requested relief herein and MISO's GIP, that it also take grid reliability and the need for
20 electric generation into account.

21 **Q. COULD YOU PROVIDE COST ESTIMATES AND POTENTIAL COST**
22 **ALLOCATION FOR INTERCONNECTION FACILITIES OR NETWORK**

**UPGRADES, IF ANY, REQUIRED TO CONNECT THE PROJECT TO THE MISO
TRANSMISSION SYSTEM?**

A. I am not able to estimate costs for the Project at this time. Costs will be assessed and estimates provided at the end of each phase of the MISO three phase study process. The costs of potential interconnection facilities will depend on the configuration of the Project as detailed in the Interconnection Request, and its impact on the grid. Numerous factors can impact Interconnection Facility costs. MISO cannot provide an estimate before the appropriate studies are complete.

**Q. ASSUMING NETWORK UPGRADES OR INTERCONNECTION FACILITIES
ARE NEEDED, COULD YOU DESCRIBE THE SCOPE OF WORK AND
CONSTRUCTION TIMELINES FOR SUCH FACILITIES?**

If a Network Upgrade is necessary, the scope of work and construction timelines would need to be established through the Definitive Planning Phase. MISO cannot describe the specific scope and timeline of a project prior to the Definitive Planning Phase.

**Q. WHAT IS MISO'S EVALUATION OF ANY POTENTIAL CONGESTION FROM
THE PROPOSED PROJECT DUE TO LOCAL ENERGY DELIVERABILITY, IF
ANY?**

A. Information, such as historical data from Westwood, may be available to help determine the possibility of any potential congestion from the Project, however MISO does not conduct any evaluations of historical congestion data as part of the Generator Interconnection Process.

IV. CONCLUSION

1 **Q. DOES THIS CONCLUDE YOUR AFFIDAVIT?**

2 A. Yes, it does.

Affidavit of Andrew Witmeier

COUNTY OF HAMILTON)

)

STATE OF INDIANA)

Andrew Witmeier, being duly sworn, deposes and states that he prepared the Affidavit of Andrew Witmeier, and the statements contained therein are true and correct to the best of his knowledge and belief.



Andrew Witmeier

SUBSCRIBED AND SWORN BEFORE ME, this 20th day of November, 2024.



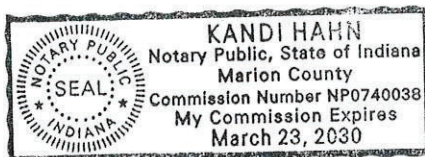


Exhibit 1

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Hi Kalen!

Templeton MISO info below.

JR: J2509
DPP Cycle: DPP 2022 Cycle
DPP Status: In DPP1 with a target completion of 1/31/2025
Expected GIA: 11/2025 per most recent MISO update
PO: Duke Westwood 345KV

Thank you,

Tiffany Murray (she/her) | Senior Counsel - NIPSCO Regulatory | NISource Corporate Services
150 West Market Street, Suite 400 | Indianapolis, IN 46204 | 📞 317-649-6424 Cell | ✉️ tiffanymurray@nisource.com

NISource



Have a concern? Need to report confidentially and/or anonymously? Click below.



From: Kalen Coleman <KColeman@nisourceenergy.org>
Sent: Thursday, October 24, 2024 9:19 AM
To: Steven Krohne <skrohne@icemiller.com>
Cc: Murray T Tiffany <tiffanymurray@nisource.com>
Subject: RE: [EXT]Assistance With IURC Filing

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Think before you click links or open attachments. If suspicious, please use the report phishing button or forward to security@nisource.com for review.

Steve,

I can help facilitate this.

Is the wind project already in the MISO GI queue? If not, could you send me any details about the project?

Kalen Coleman, PE
Associate Corporate Counsel
MISO | Legal Department
1700 CenterView Drive | Little Rock, Arkansas 72211
(501) 378-4187
kcoleman@nisourceenergy.org

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From: Steven Krohne <skrohne@icemiller.com> <Steven.Krohne@icemiller.com>
Sent: Wednesday, October 23, 2024 4:01 PM
To: Kalen Coleman <KColeman@nisourceenergy.org>
Cc: Tiffany T. Murray <tiffanymurray@nisource.com> <tiffanymurray@nisource.com>
Subject: [EXT]Assistance With IURC Filing

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Kalen,

Kristina Tridico told me that you would be the person that could help with the following issue. A client (NIPSCO) is filing a petition for approval of a new wind project and under the Commission's rules is required to provide: "The name of the RTO to which the new generation will be connected and information regarding the RTO's planning reserve margin, peaks, capacity auctions, possible ancillary services the new generation may provide, and other markets in which the new generation may participate. **A qualitative assessment by the RTO regarding the new generation shall be requested and the RTO's response (including, as applicable, the RTO's affidavit or testimony) shall be part of the utility's case in RTR.**"

In another NIPSCO case, Andrew Wittmeier provided a short affidavit, which I have attached. In this case, I don't think the Affidavit would need to be near this long. Is that something you could help facilitate?

Thanks in advance for your help,

Steve

Steven Krohne | Partner

IceMiller

P 317-238-2284 C 317-765-9281 F 317-238-2210
One American Square Suite 2600 Indianapolis, IN 46202-0200
Steven.Krohne@icemiller.com | icemiller.com

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Thank you.

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