

OFFICIAL  
EXHIBITS

IURC  
INTERVENOR'S - SABIC  
EXHIBIT NO. 1  
7-15-20 LR  
DATE REPORTER

Intervenor SABIC's Exhibit No. S1  
Cause No. 43354 MCRA 21 S1  
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VERIFIED SETTLEMENT TESTIMONY OF SABIC WITNESS  
BRIAN DICKMAN  
CAUSE NO. 43354 MCRA 21 S1  
SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A VECTREN  
ENERGY DELIVERY OF INDIANA, INC. ("VECTREN SOUTH")

1 Q: Please state your name and business address.

2 A: My name is Brian Dickman, and my business address is 225 Union Boulevard,  
3 Suite 305, Lakewood, Colorado, 80228.

4 Q: By whom are you employed and in what capacity?

5 A: I am employed by NewGen Strategies & Solutions, LLC ("NewGen"). A summary  
6 of my educational and professional background, my duties and responsibilities with  
7 NewGen, and a record of testimony can be found in **Attachment BD-1**. I have  
8 been advising SABIC Innovative Plastics Mt. Vernon, LLC ("SABIC") throughout  
9 this proceeding, including during the discussions that led to settlement.

10 Q: What is the purpose of your testimony?

11 A: The purpose of my testimony is to present SABIC's support for the Settlement  
12 Agreement ("Settlement") reached between the OUCC, Vectren South, the Vectren  
13 Industrial Group and SABIC (collectively the "Parties") on Vectren South's refresh  
14 of the four coincident peak ("4CP") study and allocation factors for certain trackers.

15 Q: Please describe the genesis of this case.

16 A: Although I was not involved prior to this proceeding, my understanding is  
17 consistent with Mr. Boerger's settlement testimony, which indicates how this

1 subdocket was established by the Indiana Utility Regulatory Commission  
2 (“Commission”) Order in Cause No. 43354 MCRA 21 (“MCRA 21”).

3 **Q: Did Vectren South comply with the requirement of MCRA 21 regarding the**  
4 **4CP demand study refresh?**

5 A: Yes. Vectren South hired Black & Veatch to perform the required 4CP demand  
6 study, and witness Russell A. Feingold provided testimony explaining the study.  
7 Vectren South witness J. Cas Swiz presented Vectren South’s recommendation to  
8 the Commission for allocation factors for the relevant trackers.

9 **Q: Did the Parties to the Settlement agree as to the reasonableness of the 4CP**  
10 **factors and whether the revised 4CP factors should be implemented in this**  
11 **case?**

12 A: No. While SABIC does not support the Black & Veatch 4CP study because it  
13 attributes to SABIC its contract demand rather than SABIC’s actual demand for  
14 purposes of calculating the transmission-related 4CP allocation factors, the  
15 Settlement reflects extensive discussions among the parties and represents a  
16 reasonable compromise on the allocations for the affected trackers to be used until  
17 Vectren’s rates are changed in Vectren’s next base rate case, which are more fully  
18 described in the settlement testimony of Vectren South witness Mr. Swiz and  
19 OUCC witness Dr. Boerger.

20 **Q: Does SABIC’s participation in the Settlement indicate SABIC agrees the**  
21 **Settlement’s allocation factors should be adopted in Vectren South’s next base**  
22 **rate case?**

23 A: No. While SABIC supports the Settlement’s allocation factors given the  
24 circumstances and timing of this proceeding, the Settlement does not prohibit any

1 Party, including SABIC, from recommending different allocation factors as part of  
2 Vectren's next base rate case.

3 **Q: Does SABIC support the Settlement as being reasonable and in the public**  
4 **interest?**

5 A: Yes. Given the relative positions of the parties, the Settlement is a reasonable  
6 compromise on the cost responsibility of the various rate classes in each tracker on  
7 a temporary basis until rates are changed in Vectren South's next base rate case,  
8 which I understand is to be filed with the Commission by year-end 2023. I agree  
9 with the other settlement witnesses that resolution of this case through Settlement  
10 avoids potentially protracted litigation and also allows swift implementation of the  
11 agreed factors.

12 **Q: Do you recommend the Commission approve the Settlement?**

13 A: Yes. The Settlement is in the public interest and I recommend approval by the  
14 Commission.

15 **Q: Does this conclude your settlement testimony?**

16 A: Yes, it does.

17

**VERIFICATION**

The undersigned, Brian Dickman, affirms under the penalties of perjury that the answers in the foregoing Settlement Testimony in Cause No. 43354-MCRA-21S1 are true to the best of his knowledge, information and belief.

/s/ Brian Dickman

Brian Dickman

Mr. Brian Dickman is an Executive Consultant in NewGen's energy practice with over 18 years of experience in the utility industry, with a focus on regulatory analytics. He has extensive experience preparing and evaluating utility revenue requirement and cost allocation studies, developing utility avoided costs, and evaluating the impact of new initiatives and transactions on a utility and its customers. Mr. Dickman's work has also included regulatory and financial modeling support for potential mergers and acquisitions, variable production cost simulations, valuations of potential asset acquisitions and other commercial opportunities, and pricing for Qualifying Facilities under the Public Utility Regulatory Policies Act. In addition to his extensive technical experience, Mr. Dickman understands the regulatory governance process and he has personally testified as an expert witness before the public utility commissions of Oregon, California, Utah, Idaho, Washington, and Wyoming. Mr. Dickman has led utility regulatory teams in the development of cost recovery filings in multiple state jurisdictions and the Federal Energy Regulatory Commission.

## EDUCATION

- Master of Business Administration, Finance Emphasis, University of Utah
- Bachelor of Science, Accounting, Utah State University

## KEY EXPERTISE

- Revenue Requirement
- Cost of Service
- Regulatory Environment
- Financial Analysis and Modeling

## RELEVANT EXPERIENCE

### Electric Cost of Service, Rate Design, and Regulatory Analysis

Mr. Dickman leads project teams in the establishment of utility revenue requirements, evaluation of cost of service studies and retail and wholesale rates, and other regulatory analyses for numerous electric utilities. Previously, Mr. Dickman led departments at a multi-billion-dollar utility responsible for interfacing with six state regulatory agencies in support of revenue requirements, cost recovery mechanisms, avoided costs, and financial impacts of utility initiatives. He now works with clients and stakeholders to prepare and evaluate cost of service studies and rate design proposals, and to help clients understand the regulatory environment impacting policy objectives. Mr. Dickman's experience also includes evaluating the rate impact of proposed mergers and acquisitions, acquisition and divestiture of utility assets, negotiated retail service contracts, changing business models, and stranded costs due to exiting load.

A sample of Mr. Dickman's regulatory analysis clients includes the following:

- Abu Dhabi Distribution Company, UAE
- Austin Energy, Texas
- East Bay Community Energy, California
- Los Angeles Department of Water and Power, California
- Lubbock Power and Light, Texas
- Monterey Bay Community Power, California
- New York Power Authority, New York
- Blackstone Group, New York
- Duke Energy, North Carolina
- Hemlock Semiconductor, Michigan
- Hydro One, Ontario CA
- Liberty Utilities, California
- Minnesota Power, Minnesota
- Newmont Mining, Nevada
- Portland General Electric, Oregon

## Brian Dickman

### Executive Consultant

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- New York State Energy Research & Development, New York
- Transmission Agency of Northern California, California
- Tri-County Metropolitan Transportation District, Oregon
- Vermont Gas Systems, Vermont
- Vistra Energy, Texas

## Expert Witness and Litigation Support

Mr. Dickman offers expert testimony regarding cost of service, rate design, and ratemaking issues before state and local regulatory bodies. He has experience providing litigation support regarding ratemaking matters at wholesale and retail levels in California, Idaho, Oregon, Washington, Wyoming, Utah, the Federal Energy Regulatory Commission, and Ontario Energy Board.

Mr. Dickman has provided comprehensive expert testimony related to system revenue requirements, cost allocation, variable production costs, generation avoided costs, and resource valuation. Mr. Dickman's expert witness and litigation support includes:

### Revenue Requirement

Mr. Dickman has prepared and evaluated revenue requirement and inter-jurisdictional cost allocation studies, supporting testimony for PacifiCorp and other clients in the following dockets:

- Wyoming Docket No. 20000-405-ER-11
- Wyoming Docket No. 20000-384-ER-10
- Wyoming Docket No. 20000-352-ER-09
- Wyoming Docket No. 20000-333-ER-08
- Utah Docket No. 10-035-89
- Idaho Case No. PAC-E-08-07
- Idaho Case No. PAC-E-06-10
- FERC Docket No. ER16-2320
- FERC Docket No. ER17-2154
- FERC Docket No. ER19-231-002
- FERC Docket No. ER20-270-000
- OEB Case No. EB-2018-0270

### Power Supply Cost Modeling and Adjustment Mechanisms

Mr. Dickman has prepared and evaluated variable power supply cost forecasts, power supply cost balancing accounts and other rate mechanisms, stranded costs, and exit fees for departing load. These cases include the following:

- Oregon Docket UM 1662
- Oregon Docket UE 287
- Oregon Docket UE 296
- Oregon Docket UE 307
- Wyoming Docket No. 20000-389-EP-11
- Wyoming Docket No. 20000-447-EA-14
- Wyoming Docket No. 20000-469-ER-15
- Utah Docket No. 12-035-67
- Utah Docket No. 13-035-32
- Utah Docket No. 14-035-31
- Utah Docket No. 15-035-03
- Idaho Case No. PAC-E-13-03
- Idaho Case No. PAC-E-14-01
- California Docket A.12-08-003
- California Docket A.13-08-001
- California Docket A.14-08-002
- California Docket A.19-06-001
- California Docket A.18-06-001

**Brian Dickman**  
Executive Consultant

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**Avoided Costs/Resource Valuation**

Mr. Dickman provided expert testimony for PacifiCorp on various components to be included in a proposed method for valuing solar generation resources, calculation of PURPA avoided costs for large resources, and support of modifications to the avoided cost calculation for small resources. These cases include the following:

- Oregon Docket UM 1610
- Oregon Docket UM 1716
- Wyoming Docket No. 20000-481-EA-15
- Utah Docket No. 15-035-T06
- Washington Docket UE-144160
- Idaho Case No. GNR-E-11-03
- Idaho Case No. PAC-E-15-03

**WORKSHOPS AND PRESENTATIONS**

Host organizations and the topics Mr. Dickman presented are displayed below.

**Advanced Workshop in Regulation and Competition, Center for Research in Regulated Industries**

- *Customer Choice at a Vertically Integrated Utility*

## Record of Testimony Submitted by Brian Dickman

Utility	Proceeding	Subject	Before	Year
1. PacifiCorp	Docket UE 307	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	2016
2. PacifiCorp	Docket UM 1662	Joint testimony with Portland General Electric regarding the need for a renewable resource tracking mechanism to provide cost recovery related to the impacts of renewable resource generation	Public Utility Commission of Oregon	2015
3. PacifiCorp	Docket UE 296	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	2015
4. PacifiCorp	Docket No. 20000-469-ER-15	Expert testimony regarding the annual variable power supply cost forecast and modifications to the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming	2015
5. PacifiCorp	Docket No. 15-035-03	Provided expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2015
6. PacifiCorp	Docket UM 1716	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Utility Commission of Oregon	2015
7. PacifiCorp	Docket No. 20000-481-EA-15	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Service Commission of Wyoming	2015
8. PacifiCorp	Docket No. 15-035-T06	Expert testimony updating standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Public Service Commission of Utah	2015
9. PacifiCorp	Case No. PAC-E-15-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resource	Idaho Public Utilities Commission	2015
10. PacifiCorp	Docket UE-144160	Declaration supporting updates to standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Washington Utilities and Transportation Commission	2014
11. PacifiCorp	Docket UE 287	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	2014
12. PacifiCorp	Case No. PAC-E-14-01	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission	2014
13. PacifiCorp	Docket A.14-08-002	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission	2014



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Utility	Proceeding	Subject	Before	Year
14. PacifiCorp	Docket No. 20000-447-EA-14	Expert testimony regarding the true up of annual variable power supply cost in the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming	2014
15. PacifiCorp	Docket No. 14-035-31	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2014
16. PacifiCorp	Case No. PAC-E-13-03	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission	2013
17. PacifiCorp	Docket A.13-08-001	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission	2013
18. PacifiCorp	Docket No. 13-035-32	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2013
19. PacifiCorp	Docket UM 1610	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Public Utility Commission of Oregon	2012
20. PacifiCorp	Docket A.12-08-003	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission	2012
21. PacifiCorp	Docket No. 12-035-67	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah	2012
22. PacifiCorp	Docket No. 20000-389-EP-11	Expert testimony regarding the collection of deferred balances accrued through previous Power Cost Adjustment Mechanisms	Public Service Commission of Wyoming	2011
23. PacifiCorp	Docket No. 20000-405-ER-11	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2011
24. PacifiCorp	Case No. GNR-E-11-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Idaho Public Utilities Commission	2011
25. PacifiCorp	Case No. PAC-E-06-10	Expert testimony regarding low income customer weatherization rebates	Idaho Public Utilities Commission	2010
26. PacifiCorp	Docket No. 20000-405-ER-10	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2010

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27. PacifiCorp	Docket No. 10-035-89	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Utah	2010
28. PacifiCorp	Docket No. 20000-352-ER-09	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2009
29. PacifiCorp	Case No. PAC-E-08-07	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Idaho Public Utilities Commission	2008
30. PacifiCorp	Docket No. 20000-333-ER-08	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming	2008