FILED September 12, 2024 INDIANA UTILITY REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC SERVICE)		
COMPANY LLC PURSUANT TO IND. CODE §§ 8-1-2-42.7,)		
8-1-2-61 AND 8-1-2.5-6 FOR (1) AUTHORITY TO MODIFY)		
ITS RETAIL RATES AND CHARGES FOR ELECTRIC)		
UTILITY SERVICE THROUGH A PHASE IN OF RATES;)		
(2) APPROVAL OF NEW SCHEDULES OF RATES AND)		
CHARGES, GENERAL RULES AND REGULATIONS,)		
AND RIDERS (BOTH EXISTING AND NEW); (3))		
APPROVAL OF REVISED COMMON AND ELECTRIC)		
DEPRECIATION RATES APPLICABLE TO ITS ELECTRIC)		
PLANT IN SERVICE; (4) APPROVAL OF NECESSARY)		
AND APPROPRIATE ACCOUNTING RELIEF,)	CAUSE NO4	6120
INCLUDING, BUT LIMITED TO, AUTHORITY TO)		
CAPITALIZE AS RATE BASE ALL EXPENDITURES FOR)		
IMPROVEMENTS TO PETITIONER'S INFORMATION)		
TECHNOLOGY SYSTEMS THROUGH THE DESIGN,)		
DEVELOPMENT, AND IMPLEMENTATION OF A WORK)		
AND ASSET MANAGEMENT ("WAM") PROGRAM, TO)		
THE EXTENT NECESSARY; AND (5) APPROVAL OF)		
ALTERNATIVE REGULATORY PLANS FOR THE)		
PARTIAL WAIVER OF 170 IAC 4-1-16(f) AND PROPOSED)		
)		
PROCESS AND, TO THE EXTENT NECESSARY,)		
IMPLEMENTATION OF A LOW INCOME PROGRAM.)		
	•		

VERIFIED PETITION FOR GENERAL RATE INCREASE AND ASSOCIATED RELIEF UNDER INDIANA CODE §§ 8-1-2-61, 8-1-2-42.7, AND 8-1-2.5-6 AND NOTICE OF PROVISION OF INFORMATION IN ACCORDANCE WITH THE COMMISSION'S MINIMUM STANDARD FILING REQUIREMENTS

Northern Indiana Public Service Company LLC ("NIPSCO" or

"Petitioner") respectfully requests that the Indiana Utility Regulatory Commission

("Commission") issue an order (1) authorizing NIPSCO to modify its retail rates and charges for electric utility service through the phase-in of rates; (2) approving new schedules of rates and charges, general rules and regulations, and riders; (3) approving revised common and electric depreciation rates applicable to its electric plant in service; (4) approving necessary and appropriate accounting relief, including, but not limited to, authority, to the extent necessary, to capitalize as rate base all expenditures for improvements to Petitioner's information technology systems through the design, development, and implementation of the WAM program;¹ (5) approving an alternative regulatory plan for a partial waiver of the requirements of 170 IAC 4-1-16(f), (6) approval of a new low income program, including through an alternative regulatory plan if necessary; (7) authorizing NIPSCO to implement temporary rates; and (8) approving other requests as described herein. This filing is made pursuant to Ind. Code §§ 8-1-2-61 and 8-1-2-42.7 ("Section 42.7"), and 8-1-2.5-6.

In accordance with the Commission's General Administrative Order 2013-5 (Rate Case Standard Procedural Schedule and Recommended Best Practices for Rate Cases Submitted under Ind. Code § 8-1-2-42.7) ("GAO 2013-5"), NIPSCO hereby provides its Notice of Intent to File Information required under the

_

The same request has been made in Cause No. 46025. The relief sought in that Cause is unopposed, but the request remains pending as of the filing of this Verified Petition.

Minimum Standard Filing Requirements ("MSFRs"), 170 IAC 1-5-1 *et seq.*, as applicable, to provide support for this Petition and to reduce or avoid disputes. In accordance with 170 IAC 1-1.1-8 and 1-1.1-9 of the Commission's Rules of Practice and Procedure, NIPSCO submits the following information in support of this Petition.

Petitioner's Corporate Status

1. NIPSCO is a limited liability company organized and existing under the laws of the State of Indiana with its principal office and place of business at 801 East 86th Avenue, Merrillville, Indiana. NIPSCO is a whollyowned subsidiary of NiSource Inc., an energy holding company whose stock is listed on the New York Stock Exchange.

Petitioner's Regulated Status

2. NIPSCO is a "public utility" within the meaning of Ind. Code § 8-1-2-1 and is subject to the jurisdiction of this Commission in the manner and to the extent provided by the Public Service Commission Act, as amended, and other pertinent laws of the State of Indiana. NIPSCO is also an "energy utility" within the meaning of Ind. Code § 8-1-2.5-2 and provides "retail energy service" as that term is defined by Ind. Code § 8-1-2.5-3. NIPSCO is also a "utility" within the meaning of Ind. Code § 8-1-2-42.7(c). NIPSCO is also subject to the jurisdiction of the Federal Energy Regulatory Commission

("FERC").

Petitioner's Operations

- 3. NIPSCO is authorized by the Commission to provide electric utility service to the public in all or part of Benton, Carroll, DeKalb, Elkhart, Fulton, Jasper, Kosciusko, LaGrange, Lake, LaPorte, Marshall, Newton, Noble, Porter, Pulaski, Saint Joseph, Starke, Steuben, Warren and White Counties in northern Indiana. NIPSCO owns, operates, manages and controls electric generating, transmission and distribution plant and equipment and related facilities ("Utility Property"), which are used and useful for the convenience of the public in the production, transmission, distribution and furnishing of electric energy, heat, light and power to the public. NIPSCO's generating facilities have an installed capacity of 2,985 net megawatts ("MW") and consist of ten (10) separate generation sites and two (2) hydroelectric generating sites (Oakdale and Norway). NIPSCO's transmission system consists of approximately 21 circuit miles of 765 kV, 453 circuit miles of 345 kV, 756 circuit miles of 138 kV and 1,689 circuit miles of 69 kV transmission lines. In addition, NIPSCO has 63 transmission substations. NIPSCO is interconnected with seven neighboring utilities.
 - 4. Pursuant to the Commission's Order dated September 24, 2003,

in Cause No. 42349, NIPSCO has transferred functional control of its transmission facilities to the Midcontinent Independent System Operator, Inc. ("MISO"), a regional transmission organization ("RTO") operated under the authority of FERC, which controls the use of NIPSCO's transmission system and the dispatching of NIPSCO's generating units. NIPSCO also engages in power purchase transactions through MISO as necessary to meet the demands of its customers.

5. During the 12 months ended December 31, 2023, NIPSCO delivered more than 14.7 billion kilowatt hours ("kWh") of electricity to more than 487,000 residential, commercial, industrial, and other customers in accordance with its tariffs, rules and regulations. More than 52% of that electricity was provided to NIPSCO's industrial customers.

Petitioner's Existing Rates and Rate Structure

6. NIPSCO's current electric basic rates and charges were approved in the Commission's August 2, 2023, Order in Cause No. 45772 (the "45772 Rate Case Order"), wherein the Commission approved a Stipulation and Settlement Agreement ("45772 Settlement") which included a Stipulation and Settlement Agreement between NIPSCO and its industrial customers on

Rate 831/531 implementation (the "Rate 831/531 Modification Settlement").²

- 7. NIPSCO's petition initiating Cause No. 45772 was filed with the Commission on September 19, 2022. Therefore, in accordance with Ind. Code § 8-1-2-42(a), more than fifteen months have passed since the filing date of NIPSCO's most recent request for a general increase in its basic rates and charges. NIPSCO's current common and electric depreciation rates and last common and electric depreciation study were approved in the Commission's 45772 Rate Case Order.³
- 8. NIPSCO files a quarterly Fuel Adjustment Clause ("FAC") proceeding in accordance with Ind. Code § 8-1-2-42(d) in Cause No. 38706-FAC-XXX to adjust its rates to account for fluctuation in its fuel and purchased energy costs.
- 9. In coordination with its FAC proceedings, NIPSCO files semiannual proceedings in: (a) Cause No. 44156-RTO-XX to recover costs associated with MISO non-fuel costs and revenues through its Rider 571 – Adjustment of

The Rate 831/531 Modification Settlement was entered into on September 12, 2022 by and between NIPSCO, Industrial Group, NLMK Indiana, and US Steel.

The Commission's Orders in Cause Nos. 44012 and 44340 approved specific depreciation accrual rates to be applied to plant and equipment identified in those proceedings. For other items of property, NIPSCO's current depreciation accrual rates were approved in the 45772 Rate Case Order.

Charges for Regional Transmission Organization and Appendix C – Regional Transmission Organization Adjustment Factor ("RTO Tracker"),⁴ and (b) Cause No. 44155-RA-XX to recover prudently incurred capacity costs through its Rider 874 – Adjustment of Charges for Resource Adequacy and Appendix F – Resource Adequacy Adjustment Factor.⁵

10. NIPSCO files an annual proceeding in Cause No. 43618-DSM-XX to recover program costs and lost revenues associated with approved demand side management and energy efficiency programs through its Rider

In its August 25, 2010 Order in Cause No. 43526, the Commission found that NIPSCO's MISO non-fuel costs and revenues and off system sales sharing should be included in one mechanism designated as the RTO Adjustment. In its December 21, 2011 Order in Cause No. 43969, the Commission approved the implementation of the RTO Adjustment approved in Cause No. 43526 by approving Rider 671 and Appendix C. In its July 18, 2016 Order in Cause No. 44688, the Commission approved NIPSCO's request for authority to defer, as a regulatory asset or liability, an amount equal to 50% of annual off system sales margins above or below the level of off- system sales margins included in the test year for recovery through the RTO tracker. In its December 4, 2019 Order in Cause No. 45159, the Commission approved NIPSCO's request to: (1) remove MISO charges and credits and collect 100% of MISO charges that are not included in the FAC through the RTO; (2) remove positive or negative OSS margins currently included in base rates and flow back 100% of any margins net of expenses through the RTO; (3) remove all back-up and maintenance margins currently included in base rates and pass back 100% of such margins net of expenses through the RTO Tracker; and (4) change the allocation methodology. In the 45772 Order, the Commission approved NIPSCO's request to remove OSS margins from its RTO tracker and instead to pass back 100% of OSS revenues net of expenses through the FAC.

In its August 25, 2010 Order in Cause No. 43526, the Commission found that NIPSCO's prudently incurred capacity should be recovered through the Resource Adequacy or RA Adjustment. In its December 21, 2011 Order in Cause No. 43969, the Commission approved the implementation of the RA Adjustment approved in Cause No. 43526 by approving Rider 674 and Appendix F. In its 45159 Order, the Commission approved the removal of all embedded capacity costs and/or credits from base rates and tracking of 100% of all capacity costs and/or credits as a charge/credit to customers through the RA Adjustment. In its 45772 Order, the Commission approved tracking capacity purchases net of the \$22,414,800 annual capacity costs included in base rates.

883 – Adjustment of Charges for Demand Side Management Adjustment Mechanism (DSMA) and Appendix G - Demand Side Management Adjustment Mechanism (DSMA) Factor.⁶

- 11. NIPSCO files an annual proceeding in Cause No. 44198-GPR-XX to revise the Green Power Rider rate set forth in its Rider 886 Green Power Rider and Appendix H Green Power Rider Rate.⁷
- 12. NIPSCO files a semi-annual proceeding in Cause No. 45557-TDSIC-XX to recover 80% of eligible and approved capital expenditures and transmission, distribution, and storage system improvement charge ("TDSIC") costs through Rider 888 Adjustment of Charges for Transmission, Distribution and Storage System Improvement Charge and Appendix J Transmission, Distribution and Storage System Improvement Charge.8

The initial tracking mechanism was approved in the Commission's May 25, 2011 Order in Cause No. 43618. In its February 27, 2017 Order in Cause No. 43618-DSM-11, the Commission approved a modification to move from a semi-annual timeline to an annual filing. In its 45159 Order, the Commission approved NIPSCO's proposal to reset lost revenues upon the implementation of new base rates.

The initial tracking mechanism was approved in the Commission's December 19, 2012 Order in Cause No. 44198. In its December 28, 2016 Order in Cause No. 44198-GPR-8, the Commission approved to move from a semi-annual timeline to an annual filing. In its June 24, 2020 Order in Cause No. 44198 GPR 12, the Commission approved to separate NIPSCO's recovery of certification costs from marketing costs.

The initial tracking mechanism was approved in the Commission's February 17, 2024 Order in Cause No. 44371.

13. NIPSCO files a semi-annual proceeding in Cause No. 46033-ECT-X to recover costs associated with NOx emissions allowances and variable chemical costs through Rider 594 – Adjustment of Charges for Environmental Cost Tracker and Appendix K – Environmental Cost Tracker Adjustment.⁹

Petitioner's Operating Results Under Existing Rates

- 14. Since the 45772 Rate Case Order, NIPSCO has brought one (1) solar facility online (Cavalry Solar Plus Storage) and anticipates three (3) solar facilities (Dunn's Bridge II Solar Plus Storage, Fairbanks Solar, and Gibson Solar) to come online by the end of the test year. The Company also plans to retire Schahfer Generating Station Units 17 and 18 by the end of the test year. Rates need to be changed to properly reflect the effects, including benefits, of these projects and retirements as soon as possible.
 - 15. Since the end of the test year in Cause No. 45772 and the end of

The initial tracking mechanism was approved in the 45772 Rate Case Order.

Dunn's Bridge II Solar Plus Storage (originally approved in Cause No. 45462, modification approving wholly owned structure in Cause No. 45936) has an aggregate nameplate capacity of approximately 435 MW solar plus 75 MW energy storage. NIPSCO anticipates receiving power in Quarter 1, 2025 and is included in rate base in this proceeding. Fairbanks Solar (originally approved in Cause No. 45511, modification approving wholly owned structure in Cause No. 46028) has an aggregate nameplate capacity of approximately 250 MW. NIPSCO anticipates receiving power in Quarter 2, 2025 and is included in rate base in this proceeding. Gibson Solar (originally approved in Cause No. 45926, modification approving wholly owned structure in Cause No. 46032) has an aggregate nameplate capacity of approximately 200 MW. NIPSCO anticipates receiving power in Quarter 3, 2025 and is included in rate base in this proceeding.

the test year in this case, NIPSCO's net original cost rate base is projected to grow by nearly \$3 billion. Of that amount, \$2 billion (68%) is represented by the solar and solar plus storage facilities for which a certificate of public convenience and necessity has been obtained. In addition, \$769.5 million (25%) is represented by transmission distribution system improvement projects that were have been preapproved in Cause No. 45557. As such, approximately 93% of the growth in net original cost rate base in this case has been found by the Commission to be required by the public convenience and necessity.¹¹

16. NIPSCO's existing rates must be revised to continue to address the changing energy marketplace, NIPSCO's generation transition, and to provide revenues adequate to cover its necessary and reasonable operating expenses and permit NIPSCO to earn a fair return upon the fair value of its property to which NIPSCO is lawfully entitled. Consequently, revisions to its rates are necessary and appropriate to provide NIPSCO an opportunity to recover its operating expenses and earn a fair return on the fair value of its

_

The Commission's 45557 Order was appealed by the NIPSCO Industrial Group in Case No. 22A-EX-00187. The appeal challenges the Commission's finding that the estimated costs of the eligible improvements included in the plan are justified by incremental benefits attributable to the plan and does not challenge the finding that public convenience and necessity require or will require the eligible improvements in the plan. The Court of Appeals affirmed the Commission's decision on September 29, 2022. NIPSCO Industrial Group filed a Petition to Transfer. As of the date of filing of this Verified Petition, the Indiana Supreme Court has not ruled on the Petition to Transfer.

property used and useful in providing service to its customers. The proposed changes are also necessary and appropriate to provide revenues which will enable NIPSCO to continue to attract capital required for additions, replacements and improvements to its Utility Property and to comply with regulatory mandates and otherwise provide adequate and reliable service at a reasonable cost.

17. As of the date of this Verified Petition, NIPSCO estimates that the proposed increase to its total revenues, including revenues from basic rates and charges and the riders as reset upon effectiveness of new base rates, will represent a net increase of 20.15% over NIPSCO's current retail revenues. Rates for individual customers and different customer classes may change by amounts less than or greater than the average increase for all customers. The pro forma net operating income statement in the form required by the Commission's GAO 2020-5 is attached hereto as Attachment A and is sponsored by Witness Richard D. Weatherford.

Alternative Regulatory Relief

18. NIPSCO proposes that the Commission approve an alternative regulatory plan ("ARP") pursuant to Ind. Code § 8-1-2.5-6 to partially waive 170 IAC 4-1-16(f) and approve Petitioner's proposed remote disconnection and

reconnection process as described in its evidence presented herein. To the extent any other proposals of NIPSCO herein may require alternative regulation, such as to implement a low income program as proposed in its evidence presented herein, NIPSCO requests that they be approved as an alternative regulatory plan. NIPSCO elects to become subject to the provisions of Ind. Code § 8-1-2.5-6 for purposes of any such proposals herein. NIPSCO requests its ARP as proposed herein be found to be in the public interest pursuant to Ind. Code § 8-1-2.5-6.

Statutory Authority for Requested Relief

- 19. This Petition is filed pursuant to Ind. Code §§ 8-1-2-0.6, 8-1-2-10, 8-1-2-19, 8-1-2-42, 8-1-2-42.7, 8-1-2-61, and 8-1-2.5-6. Other provisions of the Public Service Commission Act, as amended, Ind. Code § 8-1-2-1, *et seq.* that may be applicable to the subject matter of this proceeding include, but are not limited to, Ind. Code §§ 8-1-2-4, 6, 6.8, 10, 19, 20, 21, 24, 25, 29, 42.3, 68 and 71, Ind. Code ch. 8-1-8.4, Ind. Code ch. 8-1-8.5, Ind. Code ch. 8-1-8.7, Ind. Code ch. 8-1-8.8, Ind. Code ch. 8-1-39 and Ind. Code § 5-14-3-4.
- 20. In accordance with GAO 2013-5, on August 13, 2024 NIPSCO provided its Notice of Intent to File Rate Case to the Commission. A copy thereof was provided to stakeholders anticipated to participate in this Cause.

Test Year and Rate Base Cutoff Date

- 21. In accordance with Ind. Code § 8-1-2-42.7(d)(1), NIPSCO proposes and requests that a forward looking test year be used in this proceeding on the basis of projected data for the twelve (12) month period ending December 31, 2025. The historic base period utilized by NIPSCO in this proceeding is the twelve (12) month period ending December 31, 2023. In addition, NIPSCO is utilizing its capital structure and cost of capital based on NIPSCO's forecasted test-year-end regulatory capital structure as of December 31, 2025, for purposes of calculating a fair return on the fair value of its property.
- 22. <u>Phased Increase</u>. NIPSCO proposes a two-phase rate implementation, with potential interim phases, to reasonably reflect actual rate base, including the utility property that is used and useful at the time rates are placed into effect. Base rates would be implemented in two steps, with the first step following issuance of an Order in this Cause and based upon the actual rate base and capital structure using a general rate base cutoff of May 31, 2025 (Step 1). The second step would take place following the close of the test year, based upon actual rate base and capital structure as of December 31, 2025 (Step 2).

23. NIPSCO proposes up to two additional steps for two "major projects" (as that term is defined in 170 IAC 1-5-1(1)). The two major projects are the Fairbanks and the Gibson solar generating facilities. Each project is expected to cost greater than one percent (1%) of NIPSCO's projected net original cost rate base. A CPCN was issued for Fairbanks originally in Cause No. 45511 and revised in Cause No. 46028. A CPCN was issued for Gibson originally in Cause No. 45926 and revised in Cause No. 46032. Descriptions of these projects, including scope and location, as well as the best estimate of costs for each project are set forth in the evidence presented in Cause Nos. 46028 and 46032. NIPSCO currently expects Fairbanks to be in service by the Phase 1 general rate base cutoff and Gibson to be in service by July 31, 2025. NIPSCO proposes additional steps for these two projects to the extent they are not in service by May 31, 2025 by adjusting rates to reflect return (using the capital structure as of May 31, 2025) and depreciation rates reflected in the underlying Order issuing the CPCN. To the extent the projects are not in service by May 31, 2025 but are in service by the time Phase 1 rates are implemented, NIPSCO would propose to include the interim step in the Phase 1 implementation as described by NIPSCO Witness Bytnar. Also as explained by NIPSCO Witness Bytnar, NIPSCO seeks a waiver of the monthly investment reporting requirement set forth in 170 IAC 1-5-5(5)(D), to the extent that requirement would be deemed to apply.

Petitioner's Requested Relief

- 24. NIPSCO seeks approval of changes to its basic rates and charges for electric utility service and associated accounting relief as proposed in its evidence to be presented in this proceeding that will provide NIPSCO with the opportunity to recover its ongoing costs of providing electric utility service and earn a fair return on the fair value of its property. NIPSCO's proposal is detailed in its case-in-chief filed contemporaneous herewith and includes, but is not limited to, the following:
 - Electric Service Tariff and Standard Contract. NIPSCO seeks (a) approval of changes to its basic rates and charges for electric utility service that will provide NIPSCO with the opportunity to earn a fair return on the fair value of its property. NIPSCO seeks approval of changes to its Electric Service Tariff, including a new multi-family residential rate, changing the series number of its rate schedules to Series 600, and miscellaneous changes to its General Rules and Regulations and Standard Contract, as proposed in its evidence to be presented in this proceeding. The overall structure of NIPSCO's tariffs remains the same for residential and commercial customers (except for a proposed increase in fixed recovery by increasing customer charges), and NIPSCO is leaving the service structure for its industrial customers as approved in the 45159 Rate Order and modified in the 45772 Rate Order.
 - (b) <u>RA Tracker</u>. NIPSCO proposes to include \$16.2 million of capacity charges in base rates with any additional capacity costs or credits to flow through the RA Tracker, as proposed in its evidence to be presented in this proceeding.

- (c) <u>Depreciation Rates</u>. NIPSCO seeks approval to revise its depreciation accrual rates for electric and for common property as proposed in its evidence to be presented in this proceeding.
- (d) Accounting Relief. As explained in NIPSCO's case-in-chief, NIPSCO seeks accounting authority to implement the relief sought in this proceeding including, but not limited to, (1) the establishment of a regulatory asset should the Company determine recently released Internal Revenue Service ("IRS") private letter rulings ("PLRs") addressing the application of the normalization rules to accumulated deferred income tax and excess deferred income tax balances reflected at regulated utility subsidiaries of a consolidated group, and (2) authority to continue to defer, as a regulatory asset, discounts offered to certain customers under its Economic Development Rider for recovery in a future rate case.
- (e) <u>Regulatory Assets</u>. NIPSCO proposes to recover through its revenue requirement certain costs NIPSCO has deferred in accordance with Commission Orders identified in NIPSCO's case-in-chief.
- (f) Rate 531 Elections. NIPSCO has followed the methodology for allocation of contractual demand to the Rate 531 Industrial Large Class that was agreed to in the Stipulation and Settlement Agreement approved in Cause No. 45772. NIPSCO has designed rates for Rate 531 Tier 1 Demand on the assumption that the total contractual demand will equal the allocated demand; however, NIPSCO has also provided in its evidence what the rate would be if the existing customers only contract for the minimum Tier 1 Demand of 10 MW. Between now and the filing of rebuttal, NIPSCO will work in good faith to learn each of the 531 customers' Tier 1 demand elections and will execute contract extensions/renewals to take effect upon the effective date of Step 1 rates in this case. At rebuttal, NIPSCO will update the proposed Rate 531 Tier 1 Demand rate to reflect the higher of the actual demand as evidenced by executed contract extension/renewals and the minimum contract demand available of 70 MW (10 MW per customer for seven customers).

Submission of Case-in-Chief, Workpapers and MSFRs

25. NIPSCO's case-in-chief, workpapers and information required by GAO 2023-04, GAO 2022-02, GAO 2020-05, GAO 2013-5, the MSFRs and Ind. Code § 8-1-2-42.7, are being filed contemporaneous with this Petition to aid the Commission in processing this Petition. The supporting workpapers for proforma adjustments are also being provided in Excel format on electronic media with formulas intact pursuant to the best practices set forth in GAO 2013-5 and GAO 2020-05. As required by GAO 2020-05, and to facilitate review of the filing, NIPSCO has attached to this Petition, as <u>Attachment B</u>, an index of issues, requests, and supporting witnesses. A summary of the witness testimony is attached hereto as <u>Attachment C</u>.

Confidential Information

26. In accordance with 170 IAC 1-5-15(e)(2), the electronic copy of the cost of service study is to be treated as confidential and protected from disclosure to the public under Ind. Code §§ 5-14-3-4 and 8-1-2-29. In addition, NIPSCO will be submitting other information as part of its MSFRs and case-inchief that is confidential and trade secret information. NIPSCO is filing a motion for protective order in accordance with 170 IAC 1-1.1-4 and to otherwise comply with 170 IAC 1-5-3 contemporaneous with this Petition. NIPSCO has entered into a Standard Form Nondisclosure Agreement with the

OUCC and will work with any intervenors to negotiate an acceptable nondisclosure agreement to facilitate the production of the confidential information as appropriate.

Procedural Matters

27. In accordance with 170 IAC 1-1.1-9(a)(8), NIPSCO has worked with the OUCC and other stakeholders to develop an agreed procedural schedule, which is being separately filed as directed in GAO 2013-5. To the extent necessary or appropriate and in accordance with 170 IAC 1-1.1-15(b) and GAO 2013-5, NIPSCO requests that a prehearing conference and preliminary hearing be promptly set by the Commission as soon as practical for the purpose of addressing procedural matters including setting a procedural schedule in this proceeding that will allow completion of this proceeding in accordance with GAO 2013-5 and Ind. Code § 8-1-2-42.7.

Petitioner's Counsel

28. The names and addresses of persons authorized to accept service of papers in this proceeding are:

Counsel of Record:

Tiffany Murray (No. 28916-49) Bryan M. Likins (No. 29996-49) NiSource Corporate Services - Legal 150 West Market Street, Suite 600

Indianapolis, Indiana 46204 Murray Phone: 317-649-6424 Likins Phone: (317) 684-4922

Fax: (317) 684-4918

Murray Email: tiffanymurray@nisource.com

Likins Email: blikins@nisource.com

Nicholas K. Kile (No. 15203-53) Hillary J. Close (No. 25104-49) Lauren M. Box (No. 32521-49) Lauren Aguilar (No. 33943-49) Barnes & Thornburg LLP 11 South Meridian Street Indianapolis, Indiana 46204 Kile Phone (317) 231-7768 Close Phone (317) 231-7785

Aguilar Phone (317) 231-6474 Fax: (317) 231-7433

Box Phone (317) 231-7289

Kile Email: <u>nicholas.kile@btlaw.com</u> Close Email: hillary.close@btlaw.com Box Email: <u>lauren.box@btlaw.com</u>

Aguilar Email: <u>lauren.aguilar@btlaw.com</u>

With a copy to:

Robert C. Sears

Northern Indiana Public Service Company LLC NiSource Corporate Services - Legal 150 W. Market Street, Suite 600

Indianapolis, Indiana 46204 Sears Phone: (317) 684-4908

Email: <u>rsears@nisource.com</u>

Debi McCall

150 West Market Street, Suite 600 Indianapolis, Indiana 46204

Phone: (317) 684-4925 Fax: (317) 684-4918

Email: demccall@nisource.com

Customer Notification

29. In accordance with Ind. Code $\S\S$ 8-1-2-61(a) and 8-1-2.5(d), NIPSCO will publish notice of the filing of this Petition in a newspaper of general circulation published in each Indiana county in which NIPSCO renders retail electric service. In accordance with 170 IAC 4-1-18(C), NIPSCO will furnish to each residential customer (via bill messaging, bill inserts, or similar mailing) within forty-five (45) days of this Petition, a notice which fairly summarizes the nature and extent of the proposed changes.

WHEREFORE, Petitioner Northern Indiana Public Service Company LLC respectfully requests that the Indiana Utility Regulatory Commission approve the agreed procedural schedule being filed contemporaneous with this Verified Petition or otherwise promptly conduct a prehearing conference and preliminary hearing for purposes of establishing the procedural parameters of this proceeding, make such other investigation and hold such hearings as are necessary or advisable and thereafter, make and enter an order in this Cause by July 9, 2025:

- (a) Finding that NIPSCO's existing rates and charges for electric utility service should be increased; determining, and by order fixing, modified rates and charges to be observed in the future by NIPSCO; and authorizing and approving the filing by NIPSCO of new schedules of rates and charges applicable to its electric utility service on a phased-in basis that will provide just, reasonable, sufficient and non-confiscatory rates;
- (b) Approving various changes in the terms, conditions and provisions of NIPSCO's Electric Service Tariff (including rates, charges, rules and riders), and Standard Contract as proposed in NIPSCO's evidence herein;
- (c) Approving NIPSCO's proposed ARP for a partial waiver from 170 IAC 4-1-16(f), and to the extent necessary, to implement its low income program as proposed in NIPSCO's evidence herein;
- (c) Authorizing NIPSCO to revise its depreciation rates as proposed in NIPSCO's evidence herein;
- (d) Granting accounting authority necessary to implement the relief authorized in a Final Order in this Cause;

- (e) Approving the other requests set forth in this Petition and in NIPSCO's evidence herein; and
- (f) Granting to NIPSCO such additional and further relief as may be deemed necessary or appropriate.

Dated this 12th day of September, 2024.

Northern Indiana Public Service Company LLC

rin C. Whitehead

Erin E. Whitehead

Vice President

Regulatory Policy and Major Accounts

Verification

I affirm under penalties for perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Dated: September 12, 2024.

Erin E. Whitehead

Vice President

Regulatory Policy and Major Accounts

Prin L. Whitehead

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by email

transmission upon the following:

William Fine
Carol A. Sparks
Loraine Hitz
Michael Eckert

Indiana Office of Utility Consumer Counselor 115 W. Washington Street, Suite 1500 South

Indianapolis, Indiana 46204

wfine@oucc.in.gov

casparks@oucc.in.gov

<u>lhitz@oucc.in.gov</u>

meckert@oucc.in.gov

With a copy to:

kremy@oucc.in.gov

aparonish@oucc.in.gov

carmstrong@oucc.in.gov

chewilliams@oucc.in.gov

infomgt@oucc.in.gov

A courtesy copy has also been provided by email transmission upon the

following:

Todd A. Richardson
Joseph P. Rompala
Aaron A. Schmoll
Lewis & Kappes, P.C.

One American Square, Suite 2500

Indianapolis, Indiana 46282

trichardson@lewis-kappes.com

jrompala@lewis-kappes.com

aschmoll@lewis-kappes.com

with a copy to:

atyler@lewis-kappes.com etennant@lewis-kappes.com Jennifer Washburn

Reagan Kurtz

Citizens Action Coalition of Indiana, Inc.

1915 West 18th Street, Suite C Indianapolis, Indiana 46202

jwashburn@citact.org

With a copy to:

rkurtz@citact.org

Nikki G. Shoultz
Kristina K. Wheeler
Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis, Indiana 46204
nshoultz@boselaw.com
kwheeler@boselaw.com
With a copy to:
lbood@boselaw.com

James W. Brew
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., N.W.
3th Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
With a copy to:
AMG@smxblaw.com

Keith L. Beall Clark, Quinn, Moses, Scott & Grahn, LLP 320 N. Meridian St, Suite 1100 Indianapolis, Indiana 46204 kbeall@clarkquinnlaw.com Anne E. Becker
Lewis & Kappes, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282
abecker@lewis-kappes.com
with a copy to:
atyler@lewis-kappes.com
etennant@lewis-kappes.com

Barry A. Naum Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, Pennsylvania 17050 bnaum@spilmanlaw.com

Dated this 12th day of September, 2024.

Revenue Requirement

Sch. 1

Line 1 2	Original Cost Rate Base Times: Weighted Average Cost of Capital	Petitioner S \$ 9,229,813,441 7.59%	hch/WP Ref. Petitioner's Exhibit No. 3, Attachment 3-A-S2, Page 4 Petitioner's Exhibit No. 3, Attachment 3-A-S2, Page 5
3	Net Operating Income Required for Return on Original Cost Rate Base	700,542,840	, , ,
4	Less: Net Operating Income at Pro forma Rates With No Rate Case	383,364,871	Linked to Sch. 4 NOI
5	Net Revenue Increase Required	317,177,970	
6	Times: Gross Revenue Conversion Factor	133.9175%	Linked to GRCF Sch.
7	Recommended Gross Revenue Increase Required	\$ 424,756,681	
8	Less: NOI Neutral Revenue Requirement Associated with Fuel Reduction	\$ 56,096,064	Linked to Sch. 4 NOI
9	Petitioner's Total Recommended Revenue Increase Required	\$ 368,660,618	Petitioner's Exhibit No. 3, Attachment 3-A-S2, Page 1, Column K
10	Operating Revenues Subject to Increase at Present Rates	\$ 1,829,598,917	Linked to Sch. 4 NOI
11	Recommended Percentage Increase over Revenues Subject to Increase at Present Rates: (Line 9/Line 10) *	20.15%	

Current Average Monthly Electric Bill for Residential Customer using 729 kWh (Includes all monthly charges normally (or proposed to be) applicable to		September 2 No Rate Ca		March 20 at Propose	
Rate Class *11 residential customers) **	Volumes	Factor	Bill	Factor	Bill
Customer charge			\$14.00		\$25.0
Energy charge	729	0.166243	\$121.19	0.198605	\$144.78
FAC	729	(0.005140)	(\$3.75)	(0.000371)	(\$0.27
RA	729	0.000675	\$0.49	0.000066	\$0.05
TDSIC	729	0.009265	\$6.75	0.001292	\$0.94
RTO 1	729	0.004742	\$3.46	0.005492	\$4.00
DSM	729	0.004932	\$3.60	0.004589	\$3.35
ECT	729	0.001082	\$0.79	0.001284	\$0.94
Total		_	\$146.53	_	\$178.7

^{*}Note: Recommended Percentage Increase over Revenues Subject to Increase at Present Rates is inclusive of all rate classes.

Note 1: Regional Transmission Organization Adjustment ("RTO") - With FERC Settlement Order refund excluded

^{**}Note: Current Average Monthly Electric Bill presented for Rate *11 residential customer class.

^{***} Note: Anticipated Step 2 implementation month for Forward Test Year ended December 31, 2025.

Cause No. XXXXX Northern Indiana Public Service Company LLC

Gross Revenue Conversion Factor

	Petitioner				
Line	Gross Revenue Conversion Factor	Input Rate	GRCF Calculation Factor	Sch. 4 NOI's Pro forma Proposed Rate Adjustments	References (Links to Sch. 4)
1	Gross Revenue Increase Required		100%	\$424,756,681	Linked from Sch. 4 NOI's Pro forma Proposed Total Operating Revenues Adjustment. (Note: Sch.1's Recommended Revenue Increase is also linked from this "GRCF's Gross Revenue Increase Inquired" amount.)
2	Less: Bad Debt Rate	0.4571%	0.4571%	\$1,941,733	Linked to Sch. 4
3 4 5	Sub-total Less: Current IURC Fee effective July 1 of each year Income Before State Income Taxes	0.1500000%	99.5429% 0.1500% 99.3929%	\$422,814,949 \$637,135 \$422,177,814	Linked from Sch. 4
6	Less: State Income Tax (Current State Income Tax Rate * Line 5)	4.9000%	4.8703%	\$20,686,713	Linked from Sch. 4 (State Income Tax rate used is a blended rate. See WP Taxes.)
7	IN Utility Receipts Tax (URT rate * Line 1)	0.00%	0.0000%	\$0	Linked from Sch. 4
8	Income Before Federal Income Taxes		94.5226%	\$401,491,101	
9	Less: Federal Income Tax (Current Federal Income Tax Rate* Line 8)	21%	19.8497%	\$84,313,131	Linked from Sch. 4
	Change in Operating Income		74.6729%	\$ 317,177,970	Ties to Sch. 4 NOI's Proforma Proposed NOI Adj.
11	Gross Revenue Conversion Factor (Line 1/ Line 10)		133.9175%		Linked from Sch. 1 Line 8

Utility Receipts Tax Tips:

a	Utility Receipts Tax Calculation for utilities with Sales-for-Resale customers:		
	Sales-for-Resale revenues are not subject to Utility Receipts Tax, and must be deducted from	om total Operating Revenues.	
	Pro forma Present Sales for Resale Revenues as a % of Total Revenues Subject to Increase	:	
Line			Ref.
12	Total Pro forma Present Sales for Resale Revenues	\$0	N/A
13	Divided by: Total Operating Revenues Subject to Increase	\$1,829,598,917	Sch. 4
14	% Operating Revenues That are Exempt from Utility Receipts Tax	0.0000%	
15	% Operating Revenues Subject to Utility Recepts Tax (1 -Line 14)	100.0000%	
	Revised Line 7: Utility Receipts Tax (URT rate of 1.46% * Line 15 * Line 1)		

The IN Utility Receipts Tax is included in State Taxable Income.

Cause No. XXXXX Northern Indiana Public Service Company LLC

Sch. 4 Net Operating Income (NOI)		Pro Forma Net Op	perating Income Statement	ı					
	Base Period	Pro forma		Pro forma	Pro forma		Pro forma	NOI Neutral Pro forma	Pro forma
	Ended 12/31/2023	Present Adjustments	Sch./WP References	No Rate Case Rates	Proposed	Sch./WP References	Results Before NOI Neutral Adjustment	Proposed Adjustments ¹	Proposed Rates ²
Operating Revenues:	12/31/2023	Adjustments		Kates	Adjustments	Keterences	NOI Neutral Adjustment	Adjustments	Kates
			Petitioner's Exhibit No. 3, Attachment 3-B-S2						
Electric Operating Revenues	\$ 1,767,968,828		REV Module	\$ 1,829,598,917	\$ 424,756,681		\$ 2,254,355,598	\$ (56,096,064)	\$ 2,198,259,534
Retail Revenue Generation Credit		\$ 126,503,379 (8,963,047)	REV 1 REV 2						
FMCA and ECRM Tracker		50	REV 2						
RA Tracker TDSIC Tracker		(2,302,073) 55,933,827	REV 4 REV 5						
RTO Tracker		(31.545.797)	REV 5						
DSM Revenue		(3,504,414)	REV 7						
Interdepartment Sales Off-System Sales		2,871,979 (20,269)	REV 8 REV 9						
Non-jurisdictional Tracker		(71,788,471)	REV 10						
Transmission Forfeited Discounts		(755,429) 103.355	REV 11 REV 12						
Miscellaneous Service Revenue		(203,093)	REV 12						
Rent Revenue		97,090	REV 14						
Other Electric Revenue Environmental Cost Tracker		(4,796,999)	REV 15 REV 16						
Operating Revenues Subject to Increase Total	1,767,968,828	61,630,089		1.829.598.917	424,756,681	Linked to GRCF	2,254,355,598	(56,096,064)	2,198,259,534
	-7 , ,				,,			(00)000)001/	
Other Revenues: N/A		-		_			-		\$ -
Other Revenues Total									
Operating Revenues Total	1,767,968,828	61,630,089		1,829,598,917			2,254,355,598	(56,096,064)	2,198,259,534
Operations & Maintenance Expense:									
			Petitioner's Exhibit No. 3, Attachment 3-B-S2.						
Fuel and Purchase Power Costs (Trackable)			FPP Module						
Retail Sales	434,597,781	(105,735,866)	FPP 1	328,861,915			328,861,915	(55,709,160)	273,152,756
Interdepartment Sales Investment Tax Credits	489,634	282,494	FPP 2 FPP 3	772,128			772,128	(46,322)	725,806
Production Tax Credits	-	-	FPP 4	-			-	-	-
			Petitioner's Exhibit No. 3,						
Occasion & Maintenant France (No. Frail and Branches Borres Contr.)			Attachment 3-B-S2, O&M Module						
Operations & Maintenance Expense (Non-Fuel and Purchase Power Costs) Labor	106,922,277	11,434,464	OM 1	118,356,742			118,356,742	-	118,356,742
Electric Operations	144,040,911	(28,110,318)	OM 2	115,930,593			115,930,593	-	115,930,593
Other Departments TDSIC	33,781,200	-	OM 3 OM 4	33,781,200			33,781,200	-	33,781,200
Non-Recoverable	-	(974,796)	OM 5	(974,796)			(974,796)	-	(974,796)
Corporate Service Bill Corporate Insurance	114,193,347 14,126,508	4,454,354 3,050,319	OM 6 OM 7	118,647,701 17.176.827			118,647,701 17.176.827	-	118,647,701 17.176.827
Rents & Leases	3,665,491	6,899,764	OM 8	10,565,255			10,565,255		10,565,255
Environmental Reserve	2,246,413	(2,246,413)	OM 9	-			-	-	
Uncollectible STI	5,785,891 17,128,553	150,691 (6,011,679)	OM 10 OM 11	5,936,582 11,116,874	\$1,941,733	Linked to GRCF	5,936,582 13,058,606	(256,438)	5,680,145 13,058,606
Pension	7,326,131	(2,067,780)	OM 12	5,258,351			5,258,351	-	5,258,351
OPEB Medical Benefits	7,539,769 8.944.713	11,042 4,899,287	OM 13 OM 14	7,550,810 13.844.001			7,550,810 13.844.001	-	7,550,810 13.844.001
Other Benefits	428,926	(59,677)	OM 15	369,249			369,249		369,249
Other Employee Benefits	8,127,351	333,164	OM 16	8,460,515			8,460,515	-	8,460,515
LTIP Profit Sharing	1,222,667 955,866	(108,532) (955,866)	OM 17 OM 18	1,114,135			1,114,135	-	1,114,135
Benefits Administration	1,285,718	37,292	OM 19	1,323,009			1,323,009	-	1,323,009
RTO Cause No. 44688, 45159 & 45772 Amortization	43,299,523 1,321,479	(43,299,523) (1,321,479)	OM 20 OM 21						
Cause No. 45772 Settlement Adjustment		(1,055,188)	OM 22	(1,055,188)			(1,055,188)	-	(1,055,188)
Operations & Maintenance Expense Total	957,430,149	(160,394,244)		797,035,905	1,941,733		798,977,637	(56,011,920)	742,965,718
Depreciation & Amortization:									
			Petitioner's Exhibit No. 3,						
Depreciation Expense			Attachment 3-B-S2, DEPR Module						
Electric Plant Asset Depreciation	265,872,488	122,938,276	DEPR 1	388,810,764			388,810,764	-	388,810,764
Electric Common Depreciation Expense Cause No. 44688,45159, & 45772 - Tracker Amortization	2,994,296 2,752,431	(2,770,769)	DEPR 2 DEPR 3	223,526			223,526	-	223,526
Cause No. 44006,45159, & 45772 - Hacker Amortization	2,752,431	(2,752,431)	Petitioner's Exhibit No. 3,	-			-	-	-
			Attachment 3-B-S2,						
Amortization Expense	5.620.827	9.582.145	AMTZ Module AMTZ 1	15.202.972			15.202.972		15.202.972
Electric Plant Asset Amortization Electric Common Amortization	5,620,827 21,865,927	9,582,145 (2,175,490)	AMTZ 1 AMTZ 2	15,202,972 19,690,437			15,202,972 19,690,437		15,202,972 19,690,437
Schahfer Units 14, 15, 17 and 18 RetirementRegulatory Asset Amortization		22,724,917	AMTZ 3	77,779,438			77,779,438	-	77,779,438
WAM Regulatory Asset Amortization Renewable Reg Asset Amortization	10,618,381	2,023,206 17,188,370	AMTZ 4 AMTZ 5	2,023,206 27,806,751			2,023,206 27,806,751	-	2,023,206 27,806,751
TDSIC Regulatory Asset Amortization	10,010,381	9,579,731	AMTZ 6	9,579,731			9,579,731	-	9,579,731
Sugar Creek Amortization	-	2,540,514	AMTZ 7	2,540,514			2,540,514	-	2,540,514
Cause No. 44688, 45159, and 45772 Amortization Electric Rate Case Expense Amortization	-	15,764,441 1.293.126	AMTZ 8 AMTZ 9	15,764,441 1,293,126			15,764,441 1.293.126	-	15,764,441 1,293,126
CIS Rider 677 Amortization	-	2,845,699	AMTZ 10	2,845,699			2,845,699	-	2,845,699
Wholly Owned Solar Farm Regulatory Asset Amortization	-	8,448,157	AMTZ 11	8,448,157			8,448,157	-	8,448,157
Depreciation & Amortization Total	364,778,869	207,229,891		572,008,761			572,008,761		572,008,761

Cause No. XXXXX Northern Indiana Public Service Company LLC

Sch. 4 Net Operating Income (NOI)		Pro Forma Net O	perating Income Statement					NOI Neutral	
	Base Period Ended	Pro forma Present	Sch./WP	Pro forma No Rate Case	Pro forma Proposed	Sch./WP	Pro forma Results Before	Pro forma Proposed	Pro forma Proposed
	12/31/2023	Adjustments	References	Rates	Adjustments	References	NOI Neutral Adjustment	Adjustments 1	Rates 2
Taxes Other Than Income:									
			Petitioner's Exhibit No. 3, Attachment 3-B-S2, OTX Module						
Property Tax Expense	23,671,242	7,149,057	OTX 1	30,820,300			30,820,300	-	30,820,300
Payroll Taxes Expense	9,360,104	414,843	OTX 2	9,774,947			9,774,947	-	9,774,947
Sales Tax	(11,952)	11,952	OTX 3	-			-	-	-
IN Gross Utilty Receipts Tax Expense	(208,800)	208,800	OTX 4		\$0	Linked to GRCF			
Utility Regulatory Assessment (IURC Fee) Expense	2,202,573	512,402	OTX 5	2,714,975	\$637,135	Linked to GRCF	3,352,110	(84,144)	3,267,966
Taxes Other Than Income Total	35,013,168	8,297,054		43,310,222	637,135		43,947,357	(84,144)	43,863,213
Income Taxes:									
			Petitioner's Exhibit No. 3, Attachment 3-C-S2.						
Federal and State Income Taxes	47,253,086	(13,373,927)	ITX	33,879,159	\$104,999,844	Linked to GRCF	138,879,003	-	138,879,003
Income Taxes Total	47,253,086	(13,373,927)		33,879,159	104,999,844		138,879,003		138,879,003
Total Operating Expenses	1,404,475,272	41,758,774		1,446,234,046	107,578,712		1,553,812,758	(56,096,064)	1,497,716,694
Net Operating Income	\$ 363,493,556	\$ 19,871,315		\$ 383,364,871	\$ 317,177,970	Ties to GRCF	\$ 700,542,840	\$ -	\$ 700,542,840

¹ Petitioner's Exhibit No. 3, Attachment 3-A-S2, Page 1, Column I ² Petitioner's Exhibit No. 3, Attachment 3-A-S2, Page 1, Column L

Northern Indiana Public Service Company LLC (NIPSCO) 2024 Electric Rate Case Index of Issues, Requests, and Supporting Witnesses¹

Subject	GENERAL	Supporting Witness(es) (Petitioner's Exhibit No. Reference)
Historical Base Period	Twelve Months Ended December 31, 2023	Weatherford (No. 3)
Forward Test Year	Twelve Months Ended December 31, 2025	Weatherford (No. 3)
Minimum Standard Filing Requirements	Organization of workpapers and other information in support of requested relief in accordance with the Commission's GAO 2013- 05 and the Minimum Standard Filing Requirements (MSFRs)	Weatherford (No. 3)
Indiana Code § 8-1-2-0.6 Five Pillars	 Reliability, Affordability, Resiliency, Stability, and Environmental sustainability 	 Whitehead (No. 2) (Affordability) Cocking (No. 7) (Reliability, Resiliency, and Stability) Holcomb (No. 8) (Environmental sustainability)

This Index of the Company's case-in-chief is intended to highlight issues and is not an exhaustive list of the requests in this proceeding. A complete account of the requested relief can be found in the case-in-chief, including but not limited to petition, testimony, attachments, workpapers, and MSFR responses.

	REVENUE REQUIREMENT	
Subject	Request	Supporting Witness(es) (Petitioner's Exhibit No. Reference)
Overall Revenue Increase	• Total annual increase in net revenue of approximately \$368,660,618 or 20.15% in two steps	 Parisi (No. 1) (Overview) Whitehead (No. 2) (Drivers) Exhibit No. 3, Attachments 3-A-S1 and 3-A-S2 Weatherford (No. 3) (Overview) Accounting adjustments support (No. 18)
Financial Forecast	 Set rates based on Test Year financial forecast Reflect forecasted O&M and capital investments in rates based on work plans, as adjusted Reflects NiSource's information technology transformation plan 	 Weatherford (No. 3) (adjustments to proforma net operating income, rate base, and capital structure) Bytnar (No. 4) (rate base forecast)
Revenue Forecast	Test Year weather normalized revenue forecast	 Bartos (No. 15) (weather normalization) Lash (No. 17) (revenue and cost of fuel/purchased power forecast based upon weather normalization)
Midcontinent Independent System Operator, Inc. ("MISO")-related costs and generation fleet transition	 Reflects MISO-related costs and wholesale power purchase agreements Reflects generation fleet transition and 	 Robles (No. 10) (MISO-related costs, power purchase agreements, and overall generation retirements and transition)

		D (NI 4)
	investments in generation	• Bytnar (No. 4)
	and transmission and	• (cost recovery of
	distribution systems	generation projects)
		• Cocking (No. 7)
		• (generation fleet
		investments)
Environmental	Reflects Company's	• Holcomb (No. 8)
Compliance Costs	proposal for recovery of	• (overview)
	prudently incurred	• Bytnar (No. 4)
	environment compliance	• (cost recovery)
	and maintenance costs	• Spanos (No. 12)
	related to its coal fired	• (decommissioning
	generation and the	study on coal fired
	recovery of costs to be	generation assets)
	incurred for future	
	management.	
Prepaid Pension Asset	Reflect in capital	Weatherford (No. 3)
	structure	
Return on Equity (ROE)	Recommended midpoint:	• Rea (No. 13)
	10.85% ROE	(evaluation and
	Authorize: 10.60% ROE	recommended
		midpoint ROE)
		Whitehead (No. 2)
		(policy and authorize
		ROE)
Weighted Average Cost of	Authorize forecasted	Weatherford (No. 3)
Capital (WACC)	WACC of 7.59% applied	
	to original cost rate base	
Customer Service	Reflects Company's steps	Parisi (No. 1)
	to mitigate impact of	• (overview)
	proposed rate increases	Whitehead (No. 2)
	on customer bills	• (bill impact)
	Reflects Company's	• Cocking (No. 7)
	customer service	• (customer service
	reliability programs	reliability programs)
Vegetation Management	Reflects Company's total	• Cocking (No. 7)
(transmission and	vegetation management	
distribution)	costs	
/	I	

Compensation Benefits	Compensation and benefit programs	• Eyre (No. 11)
Corporate Allocations	Service Company allocations	 Bly (No. 5) (NSCS budgeting process, expenses, adjustments, and allocation) Baryenburch (No. 6) (overall reasonableness and necessity)
Depreciation	 Setting new depreciation rates and reflect the resulting depreciation expense in base rates based on depreciation study Costs of decommissioning reflected in depreciation study 	• Spanos (No. 12)
Taxes	Reflect forecasted Test Year tax expense in base rates	• Bass (No. 14)
Information technology ("IT")	IT transformation and Work and Asset Management ("WAM") program investment	Skinner (No. 10)(overview)Bytnar (No. 4)(ratemaking)
Terms and Conditions of Service and Tariffs	Description of changes	Whitehead (No. 2)Taylor (No. 16)(Multi-Family Rate)
Forecasted Rate Base	 Reflects forecasted capital projects in rate base Description of forecast technique 	Bytnar (No. 4)(rate base forecast)Exhibit No. 18
Customer Assistance	Proposes new low income program	Whitehead (No. 2)
Program Remote Disconnect/Reconnect Program	Alternative Regulatory Plant to waive 170 IAC 4- 1-16(f) and approve the	Whitehead (No. 2)

	Company's proposed	
	disconnect/reconnect	
	program for residential	
	customers.	
Cost of Service Study and	 Description of overall 	• Taylor (No. 16)
Overall Rate Design	Cost of Service Study	
	• Description of rate design	

COST OF SERVICE AND RATE DESIGN		
Subject	Request	Supporting Witness(es) (Petitioner's Exhibit No. Reference)
Class Cost of Service Study	Propose gradualism to address subsidy and move classes closer to Straight-Fixed-Variable pricing	Taylor (No. 16)
Overall Rate Design	Allocation of revenue increase	Whitehead (No. 2) (overview)Taylor (No. 16)(rate design)
New Rate Proposals	 Proposed Rate 615 – Multi-Family Rate Propose Rider 697 – Universal Service Program (USP) Rider 	 Taylor (No. 16) (Multi-Family Rate) Whitehead (No. 2) (USP)
Terms and Conditions of Service – Tariffs	Modifications to tariffs and new tariff offerings	Whitehead (No. 2)Taylor (No. 16) (Multi- Family Rate)

Northern Indiana Public Service Company LLC (NIPSCO) 2024 Electric Rate Case Summary of Witness Testimony¹

Ex. No.	Witness Name	Summary of Testimony
1	Vincent A. Parisi	Provides an overview of NIPSCO and its role in northern Indiana. Describes NIPSCO's electric system, its corporate structure, and its strategic vision. Explains how NIPSCO has executed its strategic vision since its last electric base rate proceeding in Cause No. 45772 and describes NIPSCO's customer service goals. Explains why NIPSCO is filling this rate case at this time and provides a brief overview of NIPSCO's case-inchief.
2	Erin E. Whitehead	Discusses statutory requirements and provides a brief background of NIPSCO's existing electric rates. Explains the key drivers and objectives for filing this case. Describes steps NIPSCO's took in preparing its case-in-chief to address customer bill impact of the proposed rate increase, cost methodology, and new tariff offerings, including proposed Low Income Program and Multi-Family Residential Rate. Describes NIPSCO's non-base rate programs and its proposed IURC Electric Service Tariff, Original Volume No. 16, including the Schedule of Rates, Riders and General Rules and Regulations (the "Proposed Tariff"). Also describes the proposed standard Agreement for Electric Service (for Rates 624, 625, 632, 633, 643, and 644), proposed standard Agreement for Electric Service (for Rate 631 and Rider 676), and

This Summary of the Company's case-in-chief witness testimony is intended facilitate review of this filing but is not an exhaustive list of the requests in this proceeding. A complete account of the requested relief can be found in the case-in-chief, including but not limited to petition, testimony, attachments, exhibits, workpapers, and MSFR responses.

		proposed Rate Release Form. Explains how the Proposed Tariff differs from NIPSCO's IURC Electric Service Tariff, Original Volume No. 15, currently on file with the Commission (the "Current Tariff"). Supports NIPSCO's proposed alternative regulatory plan for partial waiver of Commission disconnection rules.
3	Richard D. Weatherford	Presents the results of NIPSCO's Electric operations for the period beginning January 1, 2023 and ending December 31, 2023, (the "Historic Base Period"), and the projected results for the period beginning January 1, 2025 and ending December 31, 2025 (the "Forward Test Year"), adjusted on a pro forma basis for the normalization and annualization of certain amounts included in these periods. Establishes that retail electric revenues at current rates do not and will not produce a level of net operating income sufficient to provide a fair return on the net original cost of NIPSCO's property, plant, and equipment owned, operated, and serving jurisdictional electric customers. Quantifies the amount by which retail electric revenues should be increased. Sponsors capital structure. Discusses the application of General Administrative Order 2013-5 ("GAO 2013-5") and the Minimum Standard Filing Requirements ("MSFRs") and the Company's proposed rate relief in this Cause. Sponsors NIPSCO financial statements.
4	Emily J. Bytnar	Sponsors and presents NIPSCO's forecasted rate base as of May 31, 2025 (Step 1) and December 31, 2025 (Step 2). Describes NIPSCO's proposal to implement its proposed increase in at least two steps – one on issuance of an Order in this Cause, the final after the close of the test year, and up to two potential additional steps, as needed, as generation projects are placed into service.

5	Nick Bly	Provides background on the relationship between NiSource Corporate Services Company ("NCSC") and NIPSCO. Supports actual operation and maintenance ("O&M") expenses associated with services provided by NCSC to NIPSCO for the Historic Base Period, as well as certain normalization adjustments to those expenses. Supports the projected O&M expenses associated with services provided by NSCS to NIPSCO and any adjustments to those expenses for the 2024 Forecast Period and the Forward Test Year.
6	Patrick L. Baryenbruch	Presents the results of the study undertaken to determine reasonableness and necessity of the services provided by NCSC to NIPSCO's electric utility during the Historic Base Period.
7	Orville Cocking	Describes NIPSCO's generation fleet and NIPSCO's electric transmission and distribution systems. Discusses customer service and electric reliability programs. Describes the significant investments NIPSCO has made to its generation and transmission and distribution systems in recent years. Describes how NIPSCO's work described in his testimony supports the Five Pillars. Explains various pro forma expense adjustments.
8	Stephen Holcomb	Summarizes changes in environmental mandates since NIPSCO's last rate case, Cause No. 45772, which was filed in 2022. Discusses how these mandates impact NIPSCO coal generating stations.
9	Rosalva Robles	Describes the Midcontinent Independent System Operator, Inc. ("MISO") and the associated markets, NIPSCO's Generation Transition, Purchased Power and Joint Venture Build Transfer Agreements ("BTA"), and NIPSCO's capacity needs, including MISO Requirements, Resources, and Cost. Describes Demand Response Programs, modifications affecting NIPSCO's RA Adjustment

		including NIPSCO's pro forma adjustment for capacity purchases. Describes NIPSCO's PROMOD forecast and how NIPSCO derived expected production for its four renewable solar facilities.
10	Gregory Skinner	Supports the portion of NIPSCO's rate base through the Forward Test Year related to the Work and Asset Management ("WAM") program. Describes NiSource's planned 5-year information technology ("IT") transformation plan and schedule, which includes the new WAM program. Provides an overview of the WAM program and explains why it is reasonable and necessary.
11	Kirstie Eyre	Supports NiSource total rewards and sets forth comparative analyses to establish the reasonableness and competitiveness of the wages, salaries, and incentive compensation provided to employees.
12	John J. Spanos	Explains the methods and procedures used in the Depreciation Study and recommends depreciation rates for NIPSCO's forecasted electric and common plant in service as of December 31, 2025. Sponsors the results of the Depreciation Study, his depreciation analysis, and the results of the decommissioning cost studies related to generation facilities. Sets forth the annual depreciation rates as of December 31, 2023. Develops depreciation accrual rates for projected electric and common plant in service as of December 31, 2025.
13	Vincent V. Rea	Recommends the appropriate rate of return on common equity and overall rate of return for NIPSCO's jurisdictional electric operations in relation to its revenue requirement calculation.
14	Jonathan Bass	Presents and supports NIPSCO's federal and state income tax expense and taxes other than income tax expense adjustments for the Forward Test Year

		at current and proposed rates as shown in Petitioner's Exhibit No. 3, Attachment 3-A-S2 (Columns E and H). Presents and supports NIPSCO's Accumulated Deferred Income Taxes ("ADIT") and Post 1970 Investment Tax Credit ("ITC") balances and related pro forma adjustments, which are included as components of NIPSCO's capital structure as shown in Petitioner's Exhibit No. 3, Attachment 3-A-S2. Discusses NIPSCO's derivation of renewable energy tax credits from wholly owned solar projects.
15	Melissa Bartos	Explains how Historic Base Period kilowatt hours ("kWh") are normalized for weather. Explains the methodology used to develop the forecasted number of customers and usage for the Budget Period and the Forward Test Year.
16	John D. Taylor	Describes the Atrium Cost of Service Model (Atrium Model) used for NIPSCO's electric cost of service study and the various cost allocation principles, factors that influence the cost allocation framework, and the underlying methodology and basis used in the Company's electric cost of service studies. Describes the "Special Studies" employed to apportion the various categories of plant and operation and maintenance (O&M) expenses to the respective customer classes. Presents the class-by-class rate of return results and corresponding revenue surpluses or deficiencies from NIPSCO's ACOSS including the resulting unit costs by class for customer, demand, and energy-related costs with the ACOSS. Discusses revenue allocation and rate design principles and the appropriate guidelines for use in evaluating class revenue levels and rate structures. Explains and supports the allocation of the Company's revenue deficiency to the various rate classes consistent with the class revenue mitigation objectives discussed by

		NIPSCO Witness Whitehead. Discusses NIPSCO's rate design proposals and discusses in detail the analyses conducted to support the new multifamily rate class and in support of increasing the fixed bill component for both single-family and multi-family customers.
17	Candice Lash	Supports NIPSCO's electric operating revenue and fuel and purchased power adjustments, as well as the base cost of fuel.
18		Accounting adjustments support