

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

**VERIFIED PETITION OF DUKE ENERGY )**  
**INDIANA, LLC FOR; (1) APPROVAL OF )**  
**PETITIONER’S 6-YEAR PLAN FOR )**  
**ELIGIBLE TRANSMISSION, )**  
**DISTRIBUTION AND STORAGE SYSTEM )**  
**IMPROVEMENTS, PURSUANT TO ) CAUSE NO. 45647**  
**IND. CODE § 8-1-39-10; (2) APPROVAL OF A )**  
**TRANSMISSION AND DISTRIBUTION )**  
**INFRASTRUCTURE IMPROVEMENT COST )**  
**RATE ADJUSTMENT AND DEFERRALS, )**  
**PURSUANT TO IND. CODE §§ 8-1-2-10, 8-1-2- )**  
**12, 8-1-2-14, AND 8-1-39-1 ET SEQ; AND (3) )**  
**APPROVAL OF A TARGETED ECONOMIC )**  
**DEVELOPMENT PROJECT AND )**  
**RECOVERY OF COSTS ASSOCIATED WITH )**  
**THE PROJECT, PURSUANT TO IND. CODE )**  
**§§ 8-1-39-10 AND 8-1-39-11 )**

**VERIFIED PETITION**

Duke Energy Indiana, LLC (hereinafter referred to as “Petitioner,” “Company” or “Duke Energy Indiana”) respectfully petitions the Indiana Utility Regulatory Commission (“Commission”) for: (1) approval of Petitioner’s 6-year plan for eligible transmission, distribution and storage system improvements (“TDSIC 2.0”) pursuant to Ind. Code § 8-1-39-10; (2) approval of a Transmission and Distribution Infrastructure Improvement Cost Rate Adjustment and deferrals pursuant to Ind. Code § 8-1-39-9; and (3) approval of a targeted economic development project and recovery of costs associated with the project, pursuant to Ind. Code § 8-1-39-10 and 8-1-39-11. In support of this Verified Petition, Duke Energy Indiana states as follows:

1. **Petitioner’s Corporate and Regulated Status.** Duke Energy Indiana is a public utility corporation organized and existing under the laws of the State of Indiana with its principal office at 1000 E. Main Street, Plainfield, Indiana 46168, and is a wholly-owned subsidiary of Duke

Energy Indiana Holdco, LLC. It has the corporate power and authority to engage in the business of supplying electric utility service to the public in the State of Indiana. Accordingly, Petitioner is a “public utility” within the meaning of that term as used in the Indiana Public Service Commission Act, as amended, Ind. Code § 8-1-2-1 *et seq.*, and specifically, as used in Ind. Code § 8-1-39-4, and is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana, including Ind. Code § 8-1-2-1 *et seq.*

2. **Petitioner’s Electric Utility Service.** Duke Energy Indiana owns, operates, manages and controls plants, properties and equipment used and useful for the production, transmission, distribution and furnishing of electric utility service to the public in the State of Indiana. It directly supplies electric energy throughout its 22,000 square mile service area to approximately 860,000 customers located in 69 counties in the State of Indiana. Petitioner also sells electric energy for resale to Wabash Valley Power Alliance, Indiana Municipal Power Agency and to other public utilities that in turn supply electric utility service to numerous customers in areas not served directly by Petitioner.

3. **Relief Requested.** Petitioner respectfully requests Commission approval of its TDSIC 2.0 investment plan, which also includes a targeted economic development project, in accordance with Ind. Code § 8-1-39-10. Specifically, Petitioner requests: (a) a finding that the projects contained in TDSIC 2.0 are “eligible transmission, distribution, and storage system improvements” within the meaning of Ind. Code § 8-1-39-2; (b) a finding of the best estimate of the cost of the eligible improvements included in TDSIC 2.0; (c) a determination that the public convenience and necessity require or will require the eligible improvements included in TDSIC 2.0; and (d) a determination that the estimated costs of the eligible improvements included in TDSIC 2.0 are justified by incremental benefits attributable to the TDSIC Plan. If and to the extent

the Commission determines that TDSIC 2.0 is reasonable, Duke Energy Indiana requests the Commission approve TDSIC 2.0, and designate the eligible transmission, distribution and storage system improvements included in TDSIC 2.0 as eligible for Transmission, Distribution and Storage System Improvement Charge treatment in accordance with Ind. Code § 8-1-39-9. Petitioner requests the Commission approve its ratemaking proposals, including recovery of 80% of the TDSIC 2.0 costs via Standard Contract Rider No. 65 (“TDSIC Rider”), and deferral with carrying costs of 20% of the TDSIC 2.0 costs for subsequent recovery in Petitioner’s next general retail electric base rate case. Petitioner also requests that the Commission approve Petitioner’s proposed process for updating the TDSIC 2.0 Plan in future annual proceedings.

4. **Allocation Factors.** Ind. Code § 8-1-39-9(a)(1) requires Petitioner to use the customer class revenue allocation factors based on firm load approved in the public utility’s most recent retail base rate case order. Petitioner is proposing that the TDSIC 2.0 costs be allocated in conformity with the revenue allocation factors approved in its last retail base rate case (Cause No. 45253).

5. **TDSIC 2.0 Plan Projects.** In accordance with Ind. Code § 8-1-39-9(a), Petitioner’s TDSIC 2.0 investment plan and associated ratemaking requests are detailed in the prefiled case-in-chief testimony, exhibits and workpapers of Duke Energy Indiana. The TDSIC 2.0 projects and expenditures are specifically found in the following Duke Energy Indiana exhibits and workpapers, which have been filed concurrent with this Petition. The first Exhibit referenced below is attached hereto as Attachment 1. However, due to the voluminous nature of the remainder of the exhibits, they are incorporated into this Petition by reference, as required in Ind. Code § 8-1-39-9(a)(2).

6. **Duke Energy Indiana TDSIC 2.0 Exhibits and Workpapers.**

- Cost Estimate Overview for all TDSIC 2.0 Projects – Petitioner’s Exhibit 2-A (JKL)
- Distribution Circuit Detailed Cost Estimates – Petitioner’s Confidential Exhibit 2-B (JKL)
- Distribution Circuit Workplan – Petitioner’s Confidential Exhibit 2-C (JKL)
- Sortable Excel of Distribution Circuit Workplan – Petitioner’s Confidential Workpaper 1-JKL
- Transmission & Distribution Substation and Transmission Line Detailed Cost Estimates – Petitioner’s Confidential Exhibit 3-A (MDD)
- Sortable Excel of Transmission Substation Workplan – Petitioner’s Confidential Workpaper 1-MDD
- Sortable Excel of Transmission Line Workplan – Petitioner’s Confidential Workpaper 2-MDD
- Black & Veatch Investment Plan Report – Petitioner’s Exhibit 4-A (JWS)

7. **Estimated Customer Rate Impact.** In accordance with Ind. Code § 8-1-39-9(a)(3), Petitioner is required to project the effects of TDSIC 2.0 on retail rates and charges. The estimated annual rate impacts for the proposed TDSIC Rider are shown on the chart below:

<b>Duke Energy Indiana T&amp;D Infrastructure Improvement Cost Rate Adjustment Average Annual Retail Rate Impact</b>						
<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>	<b>2029</b>	<b>AVG</b>
0.52%	1.88%	1.05%	1.44%	1.00%	0.12%	0.86%

8. **Timing of Petition.** In accordance with Ind. Code § 8-1-39-9(d), Petitioner is not filing this petition within nine (9) months after the date on which the Commission issued an order

changing Petitioner's basic rates and charges. The date of Petitioner's most recent retail base rate order was June 29, 2020 in Cause No. 45253.

9. **Procedural Schedule.** Pursuant to 170 IAC 1-1.1-9, Petitioner, the Indiana Office of Utility Consumer Counselor ("OUCC"), and the following parties reasonably anticipated to participate in this proceeding: Citizens Action Coalition of Indiana, Inc., Duke Energy Industrial Group, Nucor Steel-Indiana, and Steel Dynamics, Inc. (collectively the "Parties") are in agreement with the following procedural schedule:

(i) November 23, 2021 – Duke Energy Indiana files its Petition and case-in-chief testimony;

(ii) February 16, 2022 – OUCC and Intervenors shall file their respective cases-in-chief;

(iii) March 9, 2022 – Duke Energy Indiana shall file its rebuttal testimony;

(iv) March 9, 2022 – OUCC and Intervenors shall file any cross-answering testimony;

(v) Pursuant to Ind. Code § 8-1-39-10, Petitioner requests a hearing be conducted not more than 120 days from the date of this Petition. If the Commission's schedule allows, Petitioner, OUCC, and Parties request that the Commission schedule an evidentiary hearing on March 23, 2022.

(vi) Pursuant to Ind. Code § 8-1-39-10, Petitioner requests a final Commission order approving the relief sought in this Petition by June 21, 2022, which is not more than 210 days from the date this petition is filed.

Any response to formal discovery should be made within ten (10) calendar days of the receipt of such request. Responses to formal discovery should be made within five (5) calendar days after rebuttal. Any discovery requests served after 5:00 p.m. EDT Monday through Thursday

or noon on a Friday or before a state holiday shall be deemed received on the following business day. Petitioner, OUCC, and the Parties agree that there will be blackout dates for discovery from December 23, 2021 through January 3, 2022. Dates designated as “blackout dates” shall not be included in determining the number of days provided for responding to a discovery request. Petitioner, OUCC, and Parties consent to electronic discovery.

10. **Applicable Law.** Duke Energy Indiana considers Indiana Code §§ 8-1-2-19, -23 and Ind. Code Ch. 8-1-39, among others, as applicable to the subject matter of this proceeding and believes that such statutes provide the Commission authority to approve the requested relief.

11. **Targeted Economic Development Project.** Petitioner requests that the Commission establish a subdocket to address approval of the proposed River Ridge Commerce Center Project as a targeted economic development project (“TED”), as detailed in the prefiled case-in-chief testimony and exhibits of Ms. Erin Schneider, which would constitute Petitioner’s case-in-chief testimony for the TED subdocket. Petitioner considers the provisions of the Public Service Commission Act, as amended, including Ind. Code Ch. 8-1-39 among others, to be applicable to Petitioner’s request for TED approval. Additionally, in accordance with General Administrative Order 2016-6 (“GAO 2016-6”), Petitioner is applying to the Indiana Economic Development Corporation (“IEDC”) for approval to treat costs associated with the proposed TED project as TDSIC costs. In the past the IEDC has been supportive of TED projects in River Ridge. In addition, Petitioner requests the following procedural schedule related to the subdocket proceeding:

- (i) November 23, 2021 – Duke Energy Indiana files its case-in-chief testimony;
- (ii) January 25, 2022 – OUCC and Intervenors shall file their respective cases-in-chief;
- (iii) January 31, 2022 – Duke Energy Indiana shall file its rebuttal testimony;

(iv) Week of February 14, 2022 – Evidentiary Hearing;

(v) While the Petitioner is entitled to issuance of an order within ninety (90) days, Petitioner is proposing a schedule that affords the Commission one hundred and twenty (120) days.

12. **Petitioner’s Counsel.** Andrew J. Wells and Elizabeth A. Heneghan at 1000 East Main Street, Plainfield, Indiana 46168 are counsel for Petitioner in this matter and are duly authorized to accept service of papers in this Cause on behalf of Petitioner.

WHEREFORE, Duke Energy Indiana requests that the Commission promptly publish notice, make such investigation and hold such hearings as are necessary and advisable, and thereafter make and enter an order in this Cause:

- (a) Finding that the projects contained in TDSIC 2.0 are “eligible transmission, distribution, and storage system improvements” within the meaning of Ind. Code § 8-1-39-2;
- (b) Finding that Duke Energy Indiana has provided the best estimate of the costs of the eligible improvements included in TDSIC 2.0;
- (c) Determining that the public convenience and necessity require or will require the eligible improvements included in TDSIC 2.0;
- (d) Determine that the estimated costs of the eligible improvements included in TDSIC 2.0 are justified by incremental benefits attributable to TDSIC 2.0;
- (e) Approving TDSIC 2.0 as reasonable and designating the eligible transmission, distribution and storage system improvements included in TDSIC 2.0 as TDSIC Costs eligible for Transmission, Distribution and Storage System Improvement Charge treatment in accordance with Ind. Code § 8-1-39-9;

- (f) Approving the T&D Infrastructure Improvement Cost Rate Adjustment, Standard Contract Rider No. 65, for timely recovery of 80% of the 6-Year TDSIC 2.0 cost, and deferral with carrying costs of 20% of TDSIC 2.0 costs for recovery as part of Petitioner's next general base retail electric rate case filed with the Commission;
- (g) Approving as a regulatory asset the deferred amounts;
- (h) Approving Petitioner's proposed process for updating TDSIC 2.0 in future annual proceedings;
- (i) Establishing a subdocket to address the River Ridge Commerce Center TED Project;  
and
- (j) Granting to Petitioner such additional and further relief as may be deemed necessary or appropriate.

Dated as of the 23<sup>rd</sup> day of November, 2021.

Respectfully submitted,

**DUKE ENERGY INDIANA, LLC**

By:



Counsel for Duke Energy Indiana, LLC

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Elizabeth A. Heneghan, Atty No. 24942-49  
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**VERIFICATION**

I, Stan C. Pinegar, hereby verify under the penalties of perjury that the foregoing Verified Petition is true and accurate to the best of my information, knowledge, and belief.



Stan C. Pinegar, President

November 23, 2021

Date

Duke Energy Indiana, LLC

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was hand delivered or electronically delivered this 23<sup>rd</sup> day of November, 2021, to the following:

Jeffrey Reed  
Randall C. Helmen  
Indiana Office of Utility Consumer Counselor  
PNC Center  
115 W. Washington Street  
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In addition, copies have been distributed electronically, for informational purposes, to the following:

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Dated this 23<sup>rd</sup> day of November 2021.

By:

A handwritten signature in black ink, appearing to be "A. Wells", written over a horizontal line.

Counsel for Duke Energy Indiana, Inc.

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Duke Energy Indiana - TDSIC 2.0 Infrastructure Improvement Plan				
6 Year Summary				
Distribution System Improvements				
Line No.	Project Category	2023-2028 Capital Additions	2023-2028 O&M	2023-2028 Capital & O&M Total
1	Distribution System Circuit Improvements	\$704,060,933	\$108,273,358	\$812,334,291
2	Distribution System Substation Improvements	\$176,965,506	\$41,837	\$177,007,344
3	Total Distribution - Contingency	\$155,475,254	\$0	\$155,475,254
4	<b>Total Distribution Improvements</b>	<b>\$1,036,501,694</b>	<b>\$108,315,195</b>	<b>\$1,144,816,889</b>
Transmission System Improvements				
5	Transmission System Line Improvements	\$494,662,048	\$22,610,931	\$517,272,980
6	Transmission System Substation Improvements	\$198,038,203	\$0	\$198,038,203
7	Total Transmission - Contingency	\$122,241,221	\$0	\$122,241,221
8	<b>Total Transmission Improvements</b>	<b>\$814,941,472</b>	<b>\$22,610,931</b>	<b>\$837,552,403</b>
9	<b>Total TDSIC 2.0 Improvements</b>	<b>\$1,851,443,166</b>	<b>\$130,926,126</b>	<b>\$1,982,369,292</b>
10	Targeted Economic Development - Identified Projects	\$44,143,497	\$0	\$44,143,497
11	Targeted Economic Development - Potential Transmission Improvements	\$90,000,000	\$0	\$90,000,000
12	Total Targeted Economic Development - Contingency	\$23,672,382	\$0	\$23,672,382
13	<b>Total Investment Plan</b>	<b>\$2,009,259,044</b>	<b>\$130,926,126</b>	<b>\$2,140,185,171</b>

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Summary By Year

Distribution System Improvements

Line No.	Project Category	2023 Capital Additions	2023 O&M	2023 Capital & O&M Total	2024 Capital Additions	2024 O&M	2024 Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$86,070,023	\$17,975,406	\$104,045,429	\$95,838,470	\$14,658,664	\$110,497,134
2	Distribution System Substation Improvements - TDSIC 2.0	\$14,493,107	\$41,837	\$14,534,945	\$18,052,441	\$0	\$18,052,441
3	Total Distribution - Contingency - TDSIC 2.0	\$17,746,435	\$0	\$17,746,435	\$20,098,396	\$0	\$20,098,396
4	Total Distribution Improvements - TDSIC 2.0	\$118,309,565	\$18,017,244	\$136,326,809	\$133,989,307	\$14,658,664	\$148,647,971
5	Cumulative Distribution Improvements - TDSIC 2.0	\$118,309,565	\$18,017,244	\$136,326,809	\$252,298,872	\$32,675,908	\$284,974,779
<b>Transmission System Improvements</b>							
6	Transmission System Line Improvements - TDSIC 2.0	\$35,900,449	\$2,862,794	\$38,763,243	\$58,015,946	\$2,661,355	\$60,677,301
7	Transmission System Substation Improvements - TDSIC 2.0	\$26,046,227	\$0	\$26,046,227	\$47,816,638	\$0	\$47,816,638
8	Total Transmission - Contingency - TDSIC 2.0	\$10,931,766	\$0	\$10,931,766	\$18,676,338	\$0	\$18,676,338
9	Total Transmission Improvements - TDSIC 2.0	\$72,878,442	\$2,862,794	\$75,741,236	\$124,508,922	\$2,661,355	\$127,170,277
10	Cumulative Transmission Improvements - TDSIC 2.0	\$72,878,442	\$2,862,794	\$75,741,236	\$197,387,364	\$5,524,149	\$202,911,513
11	Total T & D Improvements - TDSIC 2.0	\$191,188,007	\$20,880,038	\$212,068,044	\$258,498,229	\$17,320,019	\$275,818,248
12	Cumulative T & D Improvements - TDSIC 2.0	\$191,188,007	\$20,880,038	\$212,068,044	\$449,686,235	\$38,200,057	\$487,886,292

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Summary By Year

Distribution System Improvements

Line No.	Project Category	2025 Capital Additions	2025 O&M	2025 Capital & O&M Total	2026 Capital Additions	2026 O&M	2026 Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$119,415,156	\$16,548,331	\$135,963,487	\$126,131,284	\$17,941,286	\$144,072,570
2	Distribution System Substation Improvements - TDSIC 2.0	\$67,758,300	\$0	\$67,758,300	\$40,531,401	\$0	\$40,531,401
3	Total Distribution - Contingency - TDSIC 2.0	\$33,030,610	\$0	\$33,030,610	\$29,411,062	\$0	\$29,411,062
4	Total Distribution Improvements - TDSIC 2.0	\$220,204,066	\$16,548,331	\$236,752,397	\$196,073,747	\$17,941,286	\$214,015,033
5	Cumulative Distribution Improvements - TDSIC 2.0	\$472,502,938	\$49,224,238	\$521,727,176	\$668,576,685	\$67,165,525	\$735,742,209

Transmission System Improvements

6	Transmission System Line Improvements - TDSIC 2.0	\$141,075,955	\$3,704,375	\$144,780,330	\$107,008,432	\$3,097,939	\$110,106,371
7	Transmission System Substation Improvements - TDSIC 2.0	\$19,402,294	\$0	\$19,402,294	\$38,242,832	\$0	\$38,242,832
8	Total Transmission - Contingency - TDSIC 2.0	\$28,319,691	\$0	\$28,319,691	\$25,632,576	\$0	\$25,632,576
9	Total Transmission Improvements - TDSIC 2.0	\$188,797,941	\$3,704,375	\$192,502,315	\$170,883,840	\$3,097,939	\$173,981,779
10	Cumulative Transmission Improvements - TDSIC 2.0	\$386,185,305	\$9,228,524	\$395,413,828	\$557,069,144	\$12,326,463	\$569,395,607
11	Total T & D Improvements - TDSIC 2.0	\$409,002,007	\$20,252,705	\$429,254,712	\$366,957,587	\$21,039,225	\$387,996,812
12	Cumulative T & D Improvements - TDSIC 2.0	\$858,688,242	\$58,452,762	\$917,141,004	\$1,225,645,829	\$79,491,987	\$1,305,137,816

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Summary By Year

Distribution System Improvements

Line No.	Project Category	2027 Capital Additions	2027 O&M	2027 Capital & O&M Total	2028 Capital Additions	2028 O&M	2028 Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$132,418,981	\$19,685,394	\$152,104,375	\$144,187,021	\$21,464,276	\$165,651,297
2	Distribution System Substation Improvements - TDSIC 2.0	\$20,911,112	\$0	\$20,911,112	\$15,219,145	\$0	\$15,219,145
3	Total Distribution - Contingency - TDSIC 2.0	\$27,058,252	\$0	\$27,058,252	\$28,130,500	\$0	\$28,130,500
4	Total Distribution Improvements - TDSIC 2.0	\$180,388,344	\$19,685,394	\$200,073,738	\$187,536,665	\$21,464,276	\$209,000,941
5	Cumulative Distribution Improvements - TDSIC 2.0	\$848,965,029	\$86,850,919	\$935,815,948	\$1,036,501,694	\$108,315,195	\$1,144,816,889

Transmission System Improvements

6	Transmission System Line Improvements - TDSIC 2.0	\$85,638,312	\$7,895,606	\$93,533,918	\$67,022,954	\$2,388,862	\$69,411,816
7	Transmission System Substation Improvements - TDSIC 2.0	\$26,363,501	\$0	\$26,363,501	\$40,166,711	\$0	\$40,166,711
8	Total Transmission - Contingency - TDSIC 2.0	\$19,765,026	\$0	\$19,765,026	\$18,915,823	\$0	\$18,915,823
9	Total Transmission Improvements - TDSIC 2.0	\$131,766,839	\$7,895,606	\$139,662,445	\$126,105,489	\$2,388,862	\$128,494,351
10	Cumulative Transmission Improvements - TDSIC 2.0	\$688,835,983	\$20,222,069	\$709,058,052	\$814,941,472	\$22,610,931	\$837,552,403
11	Total T & D Improvements - TDSIC 2.0	\$312,155,183	\$27,581,001	\$339,736,183	\$313,642,154	\$23,853,138	\$337,495,292
12	Cumulative T & D Improvements - TDSIC 2.0	\$1,537,801,012	\$107,072,988	\$1,644,874,000	\$1,851,443,166	\$130,926,126	\$1,982,369,292

PETITIONER'S EXHIBIT 2-A (JKL)  
 DEI TDSIC 2.0  
 PAGE 5 of 12

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Summary By Year

Distribution System Improvements				
Line No.	Project Category	6 Year Capital Additions	6 Year O&M	6 Year Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$704,060,933	\$108,273,358	\$812,334,291
2	Distribution System Substation Improvements - TDSIC 2.0	\$176,965,506	\$41,837	\$177,007,344
3	Total Distribution - Contingency - TDSIC 2.0	\$155,475,254	\$0	\$155,475,254
4	Total Distribution Improvements - TDSIC 2.0	\$1,036,501,694	\$108,315,195	\$1,144,816,889
5	Cumulative Distribution Improvements - TDSIC 2.0	\$1,036,501,694	\$108,315,195	\$1,144,816,889
Transmission System Improvements				
6	Transmission System Line Improvements - TDSIC 2.0	\$494,662,048	\$22,610,931	\$517,272,980
7	Transmission System Substation Improvements - TDSIC 2.0	\$198,038,203	\$0	\$198,038,203
8	Total Transmission - Contingency - TDSIC 2.0	\$122,241,221	\$0	\$122,241,221
9	Total Transmission Improvements - TDSIC 2.0	\$814,941,472	\$22,610,931	\$837,552,403
10	Cumulative Transmission Improvements - TDSIC 2.0	\$814,941,472	\$22,610,931	\$837,552,403
11	Total T & D Improvements - TDSIC 2.0	\$1,851,443,166	\$130,926,126	\$1,982,369,292
12	Cumulative T & D Improvements - TDSIC 2.0	\$1,851,443,166	\$130,926,126	\$1,982,369,292



Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Detailed Summary By Year  
 Distribution System Improvements

Line No.	Project Category	2023 Material	2023 Labor	2023 Indirects	2023 AFUDC	2023 Total Capital Additions	2023 O&M	2023 Capital and O&M	2023 Retirements	2023 Total Project
1	Distribution System Circuit Improvements	\$21,611,814	\$41,675,052	\$20,455,932	\$2,327,224	\$86,070,023	\$17,975,406	\$104,045,429	\$19,215,447	\$123,260,876
2	Distribution System Substation Improvements	\$4,985,306	\$6,790,365	\$2,101,254	\$616,182	\$14,493,107	\$41,837	\$14,534,945	\$2,359,223	\$16,894,168
3	<b>Total Distribution Improvements</b>	<b>\$26,597,120</b>	<b>\$48,465,418</b>	<b>\$22,557,186</b>	<b>\$2,943,406</b>	<b>\$100,563,130</b>	<b>\$18,017,244</b>	<b>\$118,580,374</b>	<b>\$21,574,670</b>	<b>\$140,155,044</b>
<b>Transmission System Improvements</b>										
4	Transmission System Line Improvements	\$8,213,869	\$20,891,917	\$5,863,430	\$931,233	\$35,900,449	\$2,862,794	\$38,763,243	\$3,429,486	\$42,192,728
5	Transmission System Substation Improvements	\$8,330,976	\$13,440,251	\$4,013,037	\$1,217,027	\$26,046,227	\$0	\$26,046,227	\$2,866,589	\$28,912,816
6	<b>Total Transmission Improvements</b>	<b>\$16,544,845</b>	<b>\$34,332,168</b>	<b>\$9,876,467</b>	<b>\$2,148,261</b>	<b>\$61,946,675</b>	<b>\$2,862,794</b>	<b>\$64,809,469</b>	<b>\$6,296,075</b>	<b>\$71,105,544</b>
7	<b>Total T &amp; D Improvements</b>	<b>\$43,141,965</b>	<b>\$82,797,586</b>	<b>\$32,433,653</b>	<b>\$5,091,666</b>	<b>\$162,509,806</b>	<b>\$20,880,038</b>	<b>\$183,389,843</b>	<b>\$27,870,745</b>	<b>\$211,260,588</b>

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Detailed Summary By Year  
 Distribution System Improvements

Line No.	Project Category	2024 Material	2024 Labor	2024 Indirects	2024 AFUDC	2024 Total Capital Additions	2024 O&M	2024 Capital and O&M	2024 Retirements	2024 Total Project
1	Distribution System Circuit Improvements	\$24,400,105	\$46,786,550	\$21,609,669	\$3,042,146	\$95,838,470	\$14,658,664	\$110,497,134	\$20,983,652	\$131,480,786
2	Distribution System Substation Improvements	\$6,342,343	\$8,096,259	\$2,800,538	\$813,300	\$18,052,441	\$0	\$18,052,441	\$981,149	\$19,033,589
3	<b>Total Distribution Improvements</b>	<b>\$30,742,449</b>	<b>\$54,882,809</b>	<b>\$24,410,206</b>	<b>\$3,855,447</b>	<b>\$113,890,911</b>	<b>\$14,658,664</b>	<b>\$128,549,575</b>	<b>\$21,964,801</b>	<b>\$150,514,375</b>
<b>Transmission System Improvements</b>										
4	Transmission System Line Improvements	\$12,371,231	\$34,799,480	\$9,247,730	\$1,597,506	\$58,015,946	\$2,661,355	\$60,677,301	\$8,244,755	\$68,922,056
5	Transmission System Substation Improvements	\$17,216,557	\$21,963,154	\$6,958,181	\$1,678,746	\$47,816,638	\$0	\$47,816,638	\$2,617,636	\$50,434,273
6	<b>Total Transmission Improvements</b>	<b>\$29,587,787</b>	<b>\$56,762,634</b>	<b>\$16,205,911</b>	<b>\$3,276,252</b>	<b>\$105,832,584</b>	<b>\$2,661,355</b>	<b>\$108,493,939</b>	<b>\$10,862,391</b>	<b>\$119,356,330</b>
7	<b>Total T &amp; D Improvements</b>	<b>\$60,330,236</b>	<b>\$111,645,443</b>	<b>\$40,616,117</b>	<b>\$7,131,698</b>	<b>\$219,723,494</b>	<b>\$17,320,019</b>	<b>\$237,043,513</b>	<b>\$32,827,191</b>	<b>\$269,870,705</b>

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Detailed Summary By Year  
 Distribution System Improvements

Line No.	Project Category	2025 Material	2025 Labor	2025 Indirects	2025 AFUDC	2025 Total Capital Additions	2025 O&M	2025 Capital and O&M	2025 Retirements	2025 Total Project
1	Distribution System Circuit Improvements	\$31,931,771	\$56,847,172	\$27,049,867	\$3,586,346	\$119,415,156	\$16,548,331	\$135,963,487	\$23,920,905	\$159,884,392
2	Distribution System Substation Improvements	\$20,670,588	\$33,115,809	\$10,887,924	\$3,083,979	\$67,758,300	\$0	\$67,758,300	\$3,200,811	\$70,959,112
3	<b>Total Distribution Improvements</b>	<b>\$52,602,358</b>	<b>\$89,962,981</b>	<b>\$37,937,791</b>	<b>\$6,670,325</b>	<b>\$187,173,456</b>	<b>\$16,548,331</b>	<b>\$203,721,787</b>	<b>\$27,121,716</b>	<b>\$230,843,504</b>
<b>Transmission System Improvements</b>										
4	Transmission System Line Improvements	\$20,239,503	\$92,369,757	\$24,159,173	\$4,307,522	\$141,075,955	\$3,704,375	\$144,780,330	\$12,387,550	\$157,167,880
5	Transmission System Substation Improvements	\$5,736,954	\$9,878,242	\$3,112,939	\$674,160	\$19,402,294	\$0	\$19,402,294	\$1,125,311	\$20,527,606
6	<b>Total Transmission Improvements</b>	<b>\$25,976,457</b>	<b>\$102,247,999</b>	<b>\$27,272,111</b>	<b>\$4,981,681</b>	<b>\$160,478,250</b>	<b>\$3,704,375</b>	<b>\$164,182,624</b>	<b>\$13,512,861</b>	<b>\$177,695,485</b>
7	<b>Total T &amp; D Improvements</b>	<b>\$78,578,816</b>	<b>\$192,210,981</b>	<b>\$65,209,903</b>	<b>\$11,652,007</b>	<b>\$347,651,706</b>	<b>\$20,252,705</b>	<b>\$367,904,411</b>	<b>\$40,634,578</b>	<b>\$408,538,989</b>

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Detailed Summary By Year  
 Distribution System Improvements

Line No.	Project Category	2026 Material	2026 Labor	2026 Indirects	2026 AFUDC	2026 Total Capital Additions	2026 O&M	2026 Capital and O&M	2026 Retirements	2026 Total Project
1	Distribution System Circuit Improvements	\$37,015,298	\$54,287,933	\$30,841,467	\$3,986,586	\$126,131,284	\$17,941,286	\$144,072,570	\$27,899,702	\$171,972,272
2	Distribution System Substation Improvements	\$13,952,670	\$19,131,397	\$6,245,354	\$1,201,980	\$40,531,401	\$0	\$40,531,401	\$1,825,252	\$42,356,653
3	<b>Total Distribution Improvements</b>	<b>\$50,967,968</b>	<b>\$73,419,330</b>	<b>\$37,086,821</b>	<b>\$5,188,566</b>	<b>\$166,662,685</b>	<b>\$17,941,286</b>	<b>\$184,603,971</b>	<b>\$29,724,954</b>	<b>\$214,328,925</b>
<b>Transmission System Improvements</b>										
4	Transmission System Line Improvements	\$6,750,653	\$71,930,140	\$24,892,902	\$3,434,737	\$107,008,432	\$3,097,939	\$110,106,371	\$11,450,880	\$121,557,252
5	Transmission System Substation Improvements	\$13,960,263	\$17,010,487	\$5,943,877	\$1,328,205	\$38,242,832	\$0	\$38,242,832	\$1,603,854	\$39,846,686
6	<b>Total Transmission Improvements</b>	<b>\$20,710,916</b>	<b>\$88,940,627</b>	<b>\$30,836,779</b>	<b>\$4,762,942</b>	<b>\$145,251,264</b>	<b>\$3,097,939</b>	<b>\$148,349,203</b>	<b>\$13,054,734</b>	<b>\$161,403,937</b>
7	<b>Total T &amp; D Improvements</b>	<b>\$71,678,884</b>	<b>\$162,359,957</b>	<b>\$67,923,600</b>	<b>\$9,951,508</b>	<b>\$311,913,949</b>	<b>\$21,039,225</b>	<b>\$332,953,174</b>	<b>\$42,779,688</b>	<b>\$375,732,862</b>

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Detailed Summary By Year  
 Distribution System Improvements

Line No.	Project Category	2027 Material	2027 Labor	2027 Indirects	2027 AFUDC	2027 Total Capital Additions	2027 O&M	2027 Capital and O&M	2027 Retirements	2027 Total Project
1	Distribution System Circuit Improvements	\$35,559,859	\$59,413,169	\$33,126,208	\$4,319,744	\$132,418,981	\$19,685,394	\$152,104,375	\$32,467,153	\$184,571,528
2	Distribution System Substation Improvements	\$6,462,560	\$10,166,928	\$3,323,352	\$958,272	\$20,911,112	\$0	\$20,911,112	\$870,902	\$21,782,014
3	<b>Total Distribution Improvements</b>	<b>\$42,022,420</b>	<b>\$69,580,097</b>	<b>\$36,449,560</b>	<b>\$5,278,016</b>	<b>\$153,330,092</b>	<b>\$19,685,394</b>	<b>\$173,015,487</b>	<b>\$33,338,055</b>	<b>\$206,353,542</b>
<b>Transmission System Improvements</b>										
4	Transmission System Line Improvements	\$4,730,528	\$57,755,763	\$20,686,112	\$2,465,910	\$85,638,312	\$7,895,606	\$93,533,918	\$9,561,994	\$103,095,912
5	Transmission System Substation Improvements	\$8,580,200	\$13,055,961	\$3,843,439	\$883,902	\$26,363,501	\$0	\$26,363,501	\$1,622,803	\$27,986,304
6	<b>Total Transmission Improvements</b>	<b>\$13,310,727</b>	<b>\$70,811,723</b>	<b>\$24,529,551</b>	<b>\$3,349,811</b>	<b>\$112,001,813</b>	<b>\$7,895,606</b>	<b>\$119,897,419</b>	<b>\$11,184,797</b>	<b>\$131,082,217</b>
7	<b>Total T &amp; D Improvements</b>	<b>\$55,333,147</b>	<b>\$140,391,820</b>	<b>\$60,979,110</b>	<b>\$8,627,828</b>	<b>\$265,331,906</b>	<b>\$27,581,001</b>	<b>\$292,912,906</b>	<b>\$44,522,852</b>	<b>\$337,435,758</b>

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
 6 Year Detailed Summary By Year  
 Distribution System Improvements

Line No.	Project Category	2028 Material	2028 Labor	2028 Indirects	2028 AFUDC	2028 Total Capital Additions	2028 O&M	2028 Capital and O&M	2028 Retirements	2028 Total Project
1	Distribution System Circuit Improvements	\$40,150,414	\$63,168,349	\$36,139,148	\$4,729,110	\$144,187,021	\$21,464,276	\$165,651,297	\$35,573,960	\$201,225,256
2	Distribution System Substation Improvements	\$5,399,879	\$7,109,073	\$2,252,107	\$458,085	\$15,219,145	\$0	\$15,219,145	\$761,310	\$15,980,455
3	<b>Total Distribution Improvements</b>	<b>\$45,550,293</b>	<b>\$70,277,422</b>	<b>\$38,391,255</b>	<b>\$5,187,195</b>	<b>\$159,406,165</b>	<b>\$21,464,276</b>	<b>\$180,870,441</b>	<b>\$36,335,270</b>	<b>\$217,205,711</b>
<b>Transmission System Improvements</b>										
4	Transmission System Line Improvements	\$1,225,822	\$47,830,418	\$16,235,784	\$1,730,930	\$67,022,954	\$2,388,862	\$66,911,816	\$6,575,512	\$73,487,328
5	Transmission System Substation Improvements	\$13,555,397	\$19,169,042	\$6,032,246	\$1,410,027	\$40,166,711	\$0	\$40,166,711	\$1,756,266	\$41,922,978
6	<b>Total Transmission Improvements</b>	<b>\$14,781,219</b>	<b>\$66,999,460</b>	<b>\$22,268,030</b>	<b>\$3,140,957</b>	<b>\$107,189,665</b>	<b>\$2,388,862</b>	<b>\$109,578,528</b>	<b>\$8,331,778</b>	<b>\$117,910,306</b>
7	<b>Total T &amp; D Improvements</b>	<b>\$60,331,512</b>	<b>\$137,276,881</b>	<b>\$60,659,285</b>	<b>\$8,328,152</b>	<b>\$266,595,831</b>	<b>\$23,853,138</b>	<b>\$290,448,969</b>	<b>\$44,667,048</b>	<b>\$335,116,017</b>

Duke Energy Indiana - T & D Infrastructure Improvement Plan  
**6 Year Detailed Summary By Year**  
 Distribution System Improvements

Line No.	Project Category	6 Year Total Material	6 Year Total Labor	6 Year Total Indirects	6 Year Total AFUDC	6 Year Total Capital Additions	6 Year Total O&M	6 Year Total Capital and O&M	6 Year Total Retirements	6 Year Total Project
1	Distribution System Circuit Improvements	\$190,669,261	\$322,178,225	\$169,222,291	\$21,991,157	\$704,060,933	\$108,273,358	\$812,334,291	\$160,060,819	\$972,395,110
2	Distribution System Substation Improvements	\$57,813,347	\$84,409,831	\$27,610,529	\$7,131,799	\$176,965,506	\$41,837	\$177,007,344	\$9,998,648	\$187,005,992
3	<b>Total Distribution Improvements</b>	<b>\$248,482,608</b>	<b>\$406,588,056</b>	<b>\$196,832,819</b>	<b>\$29,122,956</b>	<b>\$881,026,440</b>	<b>\$108,315,195</b>	<b>\$989,341,635</b>	<b>\$170,059,466</b>	<b>\$1,159,401,101</b>
<b>Transmission System Improvements</b>										
4	Transmission System Line Improvements	\$53,531,606	\$325,577,475	\$101,085,130	\$14,467,837	\$494,662,048	\$22,610,931	\$517,272,980	\$51,650,177	\$566,423,156
5	Transmission System Substation Improvements	\$67,380,346	\$94,517,136	\$29,903,718	\$7,192,067	\$198,038,203	\$0	\$198,038,203	\$11,592,460	\$209,630,662
6	<b>Total Transmission Improvements</b>	<b>\$120,911,952</b>	<b>\$420,094,611</b>	<b>\$130,988,849</b>	<b>\$21,659,904</b>	<b>\$692,700,251</b>	<b>\$22,610,931</b>	<b>\$715,311,182</b>	<b>\$63,242,636</b>	<b>\$776,053,819</b>
7	<b>Total T &amp; D Improvements</b>	<b>\$369,394,560</b>	<b>\$826,682,667</b>	<b>\$327,821,668</b>	<b>\$50,782,860</b>	<b>\$1,573,726,691</b>	<b>\$130,926,126</b>	<b>\$1,704,652,817</b>	<b>\$233,302,103</b>	<b>\$1,935,454,920</b>