FILED April 02, 2018 INDIANA UTILITY REGULATORY COMMISSION

# STATE OF INDIANA

### INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY d/b/a VECTREN ENERGY DELIVERY OF INDIANA, INC., FOR: (1) AN ADJUSTMENT TO APPROVAL OF ITS SERVICE ELECTRIC RATES THROUGH ITS TRANSMISSION, DISTRIBUTION, AND STORAGE SYSTEM IMPROVEMENT CHARGE ("TDSIC") RATE SCHEDULE; (2) AUTHORITY TO DEFER 20% OF THE APPROVED CAPITAL EXPENDITURES AND TDSIC COSTS FOR RECOVERY IN PETITIONER'S NEXT GENERAL RATE CASE; AND (3) APPROVAL OF PETITIONER'S UPDATED 7-YEAR ELECTRIC ) PLAN, ALL PURSUANT TO IND. CODE § 8-1-39-9 )

CAUSE NO. 44910 TDSIC 2

#### INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

#### **TESTIMONY OF**

#### WES R. BLAKLEY - PUBLIC'S EXHIBIT NO. 1

## APRIL 2, 2018

Respectfully submitted,

Tiffany T

Tiffany T. Muifay) Attorney No. 28916-49 Deputy Consumer Counselor

Public's Exhibit No. 1 Cause No. 44910 TDSIC-2 Page 1 of 6

# TESTIMONY OF OUCC WITNESS WES R. BLAKLEY CAUSE NO. 44910 TDSIC-2 SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC.

# I. INTRODUCTION

1	Q:	Please state your name and business address.			
2	A:	My name is Wes R. Blakley and my business address is 115 W. Washington			
. 3		St., Suite 1500 South, Indianapolis, Indiana 46204.			
4	Q:	By whom are you employed and in what capacity?			
5	A:	I am a Senior Utility Analyst for the Office of Utility Consumer Counselor			
6		("OUCC"). A summary of my educational and professional background can			
7		be found in Appendix A at the end of my testimony.			
8	Q:	What is the purpose of your testimony?			
9	A:	My testimony addresses Southern Indiana Gas and Electric Company d/b/a			
10		Vectren Energy Delivery of Indiana, Inc.'s ("Vectren South" or "Petitioner")			
11		request to recover costs incurred for the construction and operation of			
12		investment in transmission, distribution, and storage facilities that were			
13		included in Vectren South's 7-Year Transmission, Distribution, and Storage			
14		System Improvement Charge ("TDSIC") and addressed in the Settlement			
15		Agreement approved by the Indiana Utility Regulatory Commission			
16		("Commission") in Cause No. 44910. In this tracker, Vectren South has			
17		requested approval of its TDSIC costs under Ind. Code § 8-1-39-9, which			
18		allows for recovery of eighty percent (80%) of approved capital expenditures			
19		through a periodic automatic adjustment of a utility's base rates and charges			

1		and the deferral of twenty percent (20%) of approved costs for recovery as
2		part of the next general rate case the utility files with the Commission. I
3		conclude Vectren South's proposed recovery of the costs incurred in
4		connection with its TDSIC appear to be in compliance with the terms of the
5		Cause No. 44910 Settlement Agreement (the "Settlement").
6	Q:	Please describe your review and analysis to prepare your testimony.
6 7	<b>Q:</b> A:	Please describe your review and analysis to prepare your testimony. I reviewed Vectren South's petition, testimony, schedules, and exhibits,
	-	
7	-	I reviewed Vectren South's petition, testimony, schedules, and exhibits,

# II. TDSIC-2 REVENUE REQUIREMENT AND RATE CALCULATION

11 12	Q:	Please describe the Settlement terms that relate to the calculation of Vectren South's revenue requirement and rate adjustment in this Cause.
13	A:	The following is a summary of the basic ratemaking terms of the Settlement:
14 15 16 17		(1) Vectren South shall be authorized to implement components of the TDSIC Plan in good faith up to the \$446.5 million cap over a seven-year period with various cap requirements for each year of the 7 years.
18 19 20 21 22		(2) Vectren South's petitions for rate recovery that are filed on or about August 1 will be based on the capital investments and expenses through the period ended April 30. Petitions filed on or about February 1 will include capital investments and expenses through the period ended October 31.
23 24 25 26		(3) For customers receiving service pursuant to Rate Schedules DGS, MLA, OSS, LP, BAMP and HLF, the tracked portion of approved capital expenditures and TDSIC costs will be recovered through demand charges.
27 28 29		(4) For customers served under Rate Schedules RS, B and SGS, in TDSIC-1, distribution-related costs will be recovered via a per customer monthly charge up to a cap of \$0.50 per customer per

1 month. The cap on the monthly fixed TDSIC charge will grow by 2 \$0.50 per customer in each semi-annual filing (e.g. the fixed 3 charge cap will be \$0.50 per customer in TDSIC-1, \$1.00 per month inTDSIC-2, and so on), with the overall distribution-related 4 5 TDSIC charge not to exceed \$7.00 per customer per month. Distribution-related TDSIC costs exceeding the applicable cap will 6 7 be included in the energy charge (per kWh). All transmission-8 related costs applicable to Rate Schedules RS, B, and SGS will be 9 recovered via an energy charge. (5) The Return on Equity ("ROE") included in the WACC for the mechanism will be 10.4%. TDSIC This recognizes that (1) Vectren South will continue to net the original cost of retired assets from the depreciable base used to determine its incremental 13 recoverable depreciation expense, and (2) Vectren South will not 14 15 accrue carrying costs on the amount deferred representing 20% of the TDSIC plan revenue requirement. 16 (6) Depreciation expense included for recovery in the TDSIC Plan will reflect an annualized level of expense related to the gross 18 19 new capital investment as of the cut-off date of the TDSIC filing. 20 As the investment is placed in service, it will be classified in the appropriate FERC Plant Account, and depreciated using the 21 depreciation rate approved for the Plant Account. Similarly, 22 23 property tax expense included for recovery in the TDSIC will reflect an annualized level of expense related to the gross new 24 capital investment in service as of the cut-off date of the filing. 25 The annualized property tax expenses will be calculated by 26 27 multiplying gross new capital investment in service by the then current or most recent tax rate for the projected period. 28 29 (7) Vectren South will net the depreciation expense associated with retired and replaced equipment against the depreciation expense 30 associated with new equipment in the TDSIC Plan. 31 32 (8) Vectren South has incurred \$3.7 million in development cost for the TDSIC Plan. Vectren South should amortize and recover this 33 34 deferred balance through the TDSIC over a period of three (3) years commencing in TDSIC-2. 35 36 (9) TDSIC costs will be allocated on rate schedules filed in Cause No. 44910 which take account of the rate migration of a large 37 38 customer.

- 10 11
- 12

- 17

# 1Q:With the passage of the Tax Cuts and Jobs Act of 2017, has Vectren2South adjusted its TDSIC schedules to reflect the reduction of the3federal income tax rate from 35% to 21%?

4 A: Yes, but only with respect to the federal income tax rate change. Other items
5 that are affected by the tax change will be addressed within the
6 Commission's investigation into the impacts of the Tax Cuts and Jobs Act
7 and its possible rate implications on Indiana utility ratepayers (Cause No.
8 45032).

# 9 Q: How did Vectren South calculate its revenue requirement and rate 10 adjustment in this Cause?

Vectren South's revenue requirement calculation includes a return on TDSIC 11 A: investments completed since TDSIC-1, Construction Work in Progress 12 13 ("CWIP") and deferred post in service carrying charge ("PISCC") as of 14 October 31 2017 in the amount of \$2,487,678. Incremental operating expenses include property tax expense of \$128,653, depreciation expense of 15 16 \$510,877, amortization expense for plan development costs over three years of \$1,266,228, amortization of deferred depreciation over the life of the 17 transmission or distribution asset of \$3,734 and amortization of PISCC over 18 19 the life of the transmission of distribution asset of \$8,324. This totals \$4,405,496 before the 80%/20% split. The 80% cash revenue requirement to 20 be tracked in TDSIC-2 totals \$3,524,397 with \$881,099 representing 20% of 21 the revenue requirement that will be deferred for recovery in Vectren South's 22 23 next general rate case.

# Q: Using Vectren South's data, have you verified its rate calculation and the rate impact for residential customers ?

1 Yes. Attachment WRB-1 displays my calculation of Vectren South's TDSIC A: 2 (transmission and distribution) rates for residential customers. The transmission revenue requirement components are summed and multiplied by 3 80% to arrive at the eligible transmission cash revenue requirement for 4 5 tracking in TDSIC-2. This amount is multiplied by the Residential Service 6 rate allocation percentage for transmission investment to arrive at the 7 transmission cash revenue requirement for residential customers. The 8 resulting product is then divided by the total projected annual residential 9 kWh sales resulting in a transmission rate of \$0.000334 per kWh. Grossing 10 up for Indiana Utility Receipts Tax produces a \$0.000339 per kWh transmission rate for residential customers. 11

The distribution revenue requirement components are summed and 12 13 multiplied by 80% to arrive at the eligible distribution cash revenue requirement for tracking in TDSIC-2. This amount is multiplied by the 14 Residential Service rate allocation percentage for distribution investment to 15 arrive at the distribution cash revenue requirement for residential customers. 16 The resulting product is then divided by the total number of projected 17 18 residential customers and divided by 12 months resulting in a \$0.93 per customer monthly distribution fixed charge rate. Grossing up for Indiana 19 Utility Receipts Tax produces a \$0.95 per customer monthly distribution 20 21 fixed charge rate for residential customers.

Q: Do you have any concerns with Vectren South's estimate of its TDSIC
adjustment factors for the relevant period?

A: No. In the course of my review of Petitioner's calculation of estimated
 TDSIC adjustment factors for the relevant period, nothing came to my
 attention that would indicate Petitioner's estimate is unreasonable.

# III. <u>CONCLUSION</u>

#### What do you conclude regarding Vectren South's proposed TDSIC-2 4 **Q**: 5 adjustment factors? 6 Based on my analysis of Petitioner's TDSIC-2, Vectren South's proposed A: 7 adjustment factors appear to be in compliance with the terms of the 8 Settlement authorized by the Commission in Cause No. 44910. 9 Does this conclude your testimony? **Q**: 10 A: Yes.

# APPENDIX A

1	Q:	Please describe your educational and professional background.
2	A:	I received a Bachelor of Science Degree in Business with a major in
3		Accounting from Eastern Illinois University in 1987 and worked for Illinois
4		Consolidated Telephone Company until joining the OUCC in April 1991 as a
5		staff accountant. Since that time I have reviewed and testified in hundreds of
6		tracker, rate cases and other proceedings before the Commission. I have
7		attended the Annual Regulatory Studies Program sponsored by NARUC at
8		Michigan State University in East Lansing, Michigan as well as the
9		Wisconsin Public Utility Institute at the University of Wisconsin-Madison
10		Energy Basics Program.

#### Southern Indiana Gas and Electric Company D/B/A Vectren Energy Delivery of Indiana Inc. Vectren South Cause No. 44910-TDSIC-2

#### Calculation of TDSIC Tracker Rate for Residential Customers (RS)

Cash Revenue Requirements for the 80% Trackable TDSIC Transmiss	ion and Distribution Ir	<u>ivestment</u>	Rate RS Allocation %	Rate RS
Transmission Revenue Requirement				
Return on Transimission Investment Property Tax Expense Depreciation Expense Plan Development Cost - Amortization Deferred Depreciation - Amortization Deferred Post in Service Carrying Charge - Amortization Total Transimission Revenue Requirement Times: 80%	\$747,314 30,706 71,203 505,385 330 1,140	\$1,356,078 80%		
Total 80% Transmission Cash Revenue Requirement	_	1,084,862		\$462,369
Annual kWh Sales for RS				1,383,887,469
Transmission Rate for RS Class per kWh Including Utility Receipts Tax. (.0000334*1.014 = .000201)				\$0.000334 \$0.000339
Distribution Revenue Requirement				
Return on Distribution Investment Property Tax Expense Depreciation Expense Plan Development Cost - Amortization Deferred Depreciation - Amortization Deferred Post in Service Carrying Charge - Amortization Total Distribution Revenue Requirement Times: 80% Total 80% Distribution Cash Revenue Requirement	\$1,740,364 97,948 439,674 760,843 3,405 7,184	3,049,418 80% 2,439,534	58.44%	1,425,664
Total Residential Customers				127,087
**Distribution Fixed Charge per Month for Residential Customer (RS) Including Utility Receipts Tax. (.93 *1.014 = .37)				\$0.93 \$0.95
Deferred Revenue Requirement				
Total 20% Deferred Revenue Requirement TDSIC-2		881,099		

\*\* Distribution costs collected through a fixed charge for rate RS, B and SGS capped at \$1.00 in TDSIC-2. Rate B and Rate SGS fixed charge is \$..57and .84 respectively.

#### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the *OUCC TESTIMONY OF WES R. BLAKLEY* has been served upon the following parties of record in the captioned proceeding by electronic service on April 2, 2018.

Robert E. Heidorn P. Jason Stephenson **VECTREN SOUTH** One Vectren Square Evansville, IN 47708 <u>rheidorn@vectren.com</u> jstephenson@vectren.com Steven W. Krohne ICE MILLER LLP One American Square Suite 2900 Indianapolis, IN 46282-0200 Steven.krohne@icemiller.com

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# **AFFIRMATION**

I affirm, under the penalties for perjury, that the foregoing representations are true.

er Wes R. Blakley

Senior Utility Analyst

Indiana Office of Utility Consumer Counselor

April 2, 2018 Date

Cause No. 44910 TDSIC 2