

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC )  
SERVICE COMPANY LLC PURSUANT TO IND. CODE )  
§§ 8-1-242.7, 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 ) CAUSE NO. 46120  
ELECTRIC PLANT IN SERVICE; (4) APPROVAL OF )  
NECESSARY AND APPROPRIATE ACCOUNTING )  
RELIEF, 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 REMOTE DISCONNECTION AND )  
RECONNECTION PROCESS AND, TO THE EXTENT )  
NECESSARY, IMPLEMENTATION OF A LOW )  
INCOME PROGRAM. )

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR**  
**PUBLIC’S EXHIBIT NO. 6**  
**TESTIMONY OF OUCC WITNESS**  
**ROOPALI SANKA**

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER  
COUNSELOR



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**TESTIMONY OF OUCC WITNESS ROOPALI SANKA  
CAUSE NO. 46120  
NORTHERN INDIANA PUBLIC SERVICE COMPANY**

**I. INTRODUCTION**

1 **Q: Please state your name and business address.**

2 A: My name is Roopali Sanka, and my business address is 115 West Washington  
3 Street, Suite 1500 South, Indianapolis, Indiana 46024.

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

5 A: I am employed as a Utility Analyst in the Indiana Office of Utility Consumer  
6 Counselor's ("OUCC") Electric Division. A summary of my educational  
7 background and experience is included in Appendix A attached to my testimony.

8 **Q: What is the purpose of your testimony?**

9 A: I address Northern Indiana Public Service Company LLC's ("NIPSCO" or  
10 "Petitioner") proposed pro forma \$3.2 million increase to Vegetation Management  
11 operations and maintenance ("O&M") expense for 2025. NIPSCO is proposing a  
12 total pro forma expense of \$29.4 million. I explain why NIPSCO's proposed 7-year  
13 trim cycle and \$3.2 million increase should not be approved, and its current 10-year  
14 trim cycle should continue, leaving a total pro forma expense of \$26.2 million.

15 **Q: Please describe the review you conducted to prepare your testimony.**

16 A: I reviewed NIPSCO's Verified Petition and relevant direct testimony, exhibits, and  
17 attachments. I also assisted with developing data requests ("DR"), both formal and  
18 informal, reviewed Petitioner's responses to the OUCC's DRs and to DRs from  
19 other parties and discussed related matters with other OUCC staff members.  
20 Additionally, I reviewed NIPSCO's Annual Vegetation Management Reports filed

1 in Cause No. 43663 for 2018-2023 and reviewed the 2023 Indiana Utility  
2 Regulatory Commission's ("Commission") Electric Utility Reliability Report. I  
3 also reviewed other utilities' vegetation management programs in recent rate cases  
4 including AES Indiana (Cause No. 45911), Duke Energy Indiana (Cause No.  
5 46038), and CenterPoint Energy (Cause No. 45990). I also reviewed the testimony  
6 of NIPSCO witness Orville Cocking in Cause No. 45772 and the Commission's  
7 Final Order in that rate case.

8 **Q: To the extent you do not address a specific item in your testimony, should this**  
9 **be construed to mean you agree with NIPSCO's proposal?**

10 A: No. My silence on any issue should not be construed as an endorsement. Also, my  
11 silence in response to any actions or adjustments stated or implied by Petitioner  
12 should not be construed as an endorsement.

## II. VEGETATION MANAGEMENT

### A. Proposed Vegetation Management Amount

13 **Q: What amount is NIPSCO requesting for vegetation management operations &**  
14 **maintenance ("O&M")?**

15 A: NIPSCO proposes to increase its annual vegetation management funding by \$3.2  
16 million for a total of \$29,427,942.<sup>1</sup>

17 **Q: Why is NIPSCO requesting an increase in its vegetation management expense?**

18 A: Per Mr. Cocking's testimony in this Cause, since the start of NIPSCO's Vegetation  
19 Management Program, NIPSCO has increased the funding for this program to focus  
20 on trimming more distribution and sub-transmission circuit miles to improve

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<sup>1</sup> Cocking Direct, p. 51, ll. 13-18.

1 overall reliability. The 2025 budget increase for vegetation management primarily  
2 focuses on clearing circuits with the highest tree-related outages. The proposed \$3.2  
3 million budget increase is projected to allow NIPSCO to trim approximately 457  
4 more miles in one year than its three-year average.<sup>2</sup> This results in a 7-year trim  
5 cycle, which NIPSCO argues will allow Petitioner to improve customer reliability  
6 by reducing vegetation-related outages.<sup>3</sup>

7 **Q: How did NIPSCO derive its proposed vegetation management total pro forma**  
8 **amount of \$29.4 million?**

9 A: In response to OUCC discovery, NIPSCO stated, “The Vegetation Management  
10 budget in 2025 was set at \$26.2M, but has been increased to a present estimate (PE)  
11 of \$27.2M to move toward a 7-year cycle. The annual spend to complete a 7-year  
12 cycle is \$29.5M.”<sup>4</sup>

13 **Q: Has NIPSCO been engaging supplementary line clearance vendors?**

14 A: Yes. Mr. Cocking testified that NIPSCO has engaged supplementary line clearance  
15 vendors since 2023 to perform vegetation management on a case-by-case basis to  
16 supplement NIPSCO’s existing vendor base. He stated this has increased the  
17 resource availability and cost competition.<sup>5</sup> Mr. Cocking indicated this strategy was  
18 implemented to address tight labor markets, increased competition for line

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<sup>2</sup> Cocking Direct, p. 51, ll. 13-18, and p. 44, ll. 15-16 (1,328 planned circuit miles - 871 circuit miles per year (the recent three-year average) = 457 miles).

<sup>3</sup> Cocking Direct, p. 41, ll. 8-14.

<sup>4</sup> Attachment RS-1, pp. 2-4. Witness Cocking states the figure is \$29,427,942. Although the figure is closer to \$29.4, the Data Response states \$29.5. NIPSCO does not explain the discrepancy between the two figures.

<sup>5</sup> Cocking Direct, p. 42, ll. 4-18.

1 clearance crews, and increases in fuel and equipment costs.<sup>6</sup>

2 **Q: Is it necessary for NIPSCO to use supplementary line clearance vendors to**  
3 **achieve its vegetation management goals?**

4 A: No. NIPSCO has not demonstrated these vendors are necessary to meet its  
5 vegetation management objectives. While supplementary line clearance vendors  
6 may afford additional flexibility, NIPSCO did not provide evidence showing  
7 supplementary vendors are critical to achieving its proposed transition to a 7-year  
8 trim cycle or that such vendors offer capabilities unavailable from NIPSCO's  
9 existing vendor pool. The additional vendors may help mitigate resource  
10 constraints, but NIPSCO has not explicitly quantified any related reliability  
11 improvements or improvements in cost-effectiveness. NIPSCO has also not  
12 provided a cost-benefit analysis to justify the necessity of the supplementary  
13 clearance line vendors for vegetation management.

#### **B. Vegetation Management Expense Concerns**

14 **Q: What is your initial concern regarding NIPSCO's proposed vegetation**  
15 **management expense increase?**

16 A: I take issue with NIPSCO's proposed pro forma \$3.2 million increase to the 2025  
17 vegetation management O&M expense due to NIPSCO not demonstrating, and  
18 adequately supporting, the need to move to a 7-year vegetation management cycle,  
19 given its tree-related outage data. Table 1<sup>7</sup> below reflects NIPSCO's 2016 to 2023  
20 tree-related outages. This data shows a decreasing trendline in NIPSCO's tree-

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<sup>6</sup> *Id.*

<sup>7</sup> Cocking Direct, p. 43, Table 2.

1 related outages (excluding major events) or, as NIPSCO states in its response to  
 2 OUCC DR 8-015, “the number of outages which were determined to be tree  
 3 related[.]”<sup>8</sup> Major events were excluded because “Vegetation Management work  
 4 during a storm is charged and budgeted within the Storm budget, not within the  
 5 Vegetation Management budget” as NIPSCO states in its response to OUCC DR  
 6 8-006.<sup>9</sup> Figure 1<sup>10</sup> below is a graphic representation of the Table 1 data.

**Table 1<sup>11</sup>**

<b>Tree Related Outages (Excluding Major Events)</b>		
	<b>Outages</b>	<b>Severe Days</b>
2016 Tree Outages	3,705	15
2017 Tree Outages	3,610	16
2018 Tree Outages	3,595	20
2019 Tree Outages	3,056	29
2020 Tree Outages	2,875	15
2021 Tree Outages	3,233	27
2022 Tree Outages	2,815	12
2023 Tree Outages	2,624	14

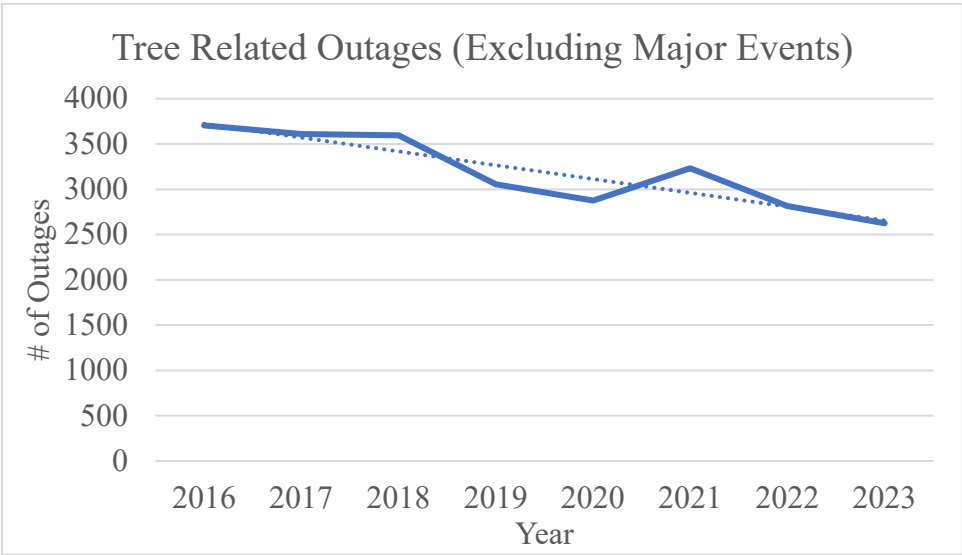
<sup>8</sup> Attachment RS-1, p. 6.

<sup>9</sup> Attachment RS-1, p. 1.

<sup>10</sup> Cocking Direct, p. 43, Table 2.

<sup>11</sup> Cocking Direct, p. 43, Table 2.

**Figure 1**



1 **Q: Do Table 1 and Figure 1 support NIPSCO shifting to a 7-year vegetation**  
2 **management cycle?**

3 A: No. Petitioner’s annual tree-related outages have declined every year since 2016,  
4 with the exception of 2021. This indicates the existing vegetation management  
5 program, with NIPSCO’s current trim cycle, is already improving reliability.  
6 NIPSCO’s tree-related outage data does not demonstrate that NIPSCO needs to  
7 move to a 7-year vegetation management cycle. When comparing 2016 to 2023,  
8 there is a difference of about 1,000 tree outages even though there is only a  
9 difference of one severe day between these years. This demonstrates severe days  
10 are not the sole driver for tree-related outages. Both 2016 and 2020 have the same  
11 number of severe days, but 2020 had 830 fewer tree outages than 2016. Notably,  
12 tree-related outages were lowest in 2022 and 2023. Hence, Table 1 does not reflect  
13 a direct causation between the number of severe days and the number of tree-related  
14 outages. The data does not support NIPSCO’s claim that the current 10-year cycle  
15 “is not keeping up with the growth rate of the trees in the region” as NIPSCO states

1 in its response to OUC DR 8-017.<sup>12</sup> NIPSCO has not shown a 7-year trim cycle  
2 will lead to significant improvements beyond those already achieved. Additionally,  
3 NIPSCO has not provided the projected number of outages that will be reduced by  
4 moving from a 10-year vegetation management cycle to a 7-year cycle.

5 **Q: Do you have concerns regarding NIPSCO’s claim that the added vegetation**  
6 **management expense will improve reliability?**

7 **A:** Yes. NIPSCO has not excluded the non-vegetation management external forces in  
8 its reliability tables. When the OUC asked NIPSCO about its projected reliability  
9 metrics for 2024 and 2025 in discovery, NIPSCO provided the following tables:

**Table 2<sup>13</sup>**

**Table 3<sup>14</sup>**

2024 Projected Reliability Metrics				2025 Projected Reliability Metrics			
Month	CAIDI	SAIDI	SAIFI	Month	CAIDI	SAIDI	SAIFI
January	150	6.43	0.0430	January	164	6.82	0.0415
February	148	7.00	0.0472	February	162	8.05	0.0498
March	139	7.38	0.0529	March	156	9.44	0.0605
April	149	9.40	0.0632	April	148	8.54	0.0578
May	163	13.28	0.0815	May	178	14.69	0.0827
June	176	20.99	0.1193	June	189	21.82	0.1157
July	189	21.26	0.1127	July	196	22.04	0.1125
August	186	18.02	0.0967	August	201	16.16	0.0805
September	150	11.81	0.0788	September	153	11.58	0.0758
October	160	13.62	0.0852	October	185	14.52	0.0787
November	175	10.51	0.0600	November	218	13.77	0.0633
December	160	9.19	0.0573	December	164	8.96	0.0546
<b>2024 Total</b>	<b>166</b>	<b>148.90</b>	<b>0.8977</b>	<b>2025 Total</b>	<b>179</b>	<b>156.40</b>	<b>0.8734</b>

10 NIPSCO did not explain how it is able to isolate vegetation management from all  
11 the effects of external forces in its reliability data, nor has it provided the inputs,

<sup>12</sup> Attachment RS-1, p. 7.

<sup>13</sup> Attachment RS-1, p. 5.

<sup>14</sup> Attachment RS-1, p. 5.



1 underlying assumptions, and/or modeling used to derive the projected reliability  
2 metrics for the Tables above. There are multiple drivers that contribute to a utility's  
3 reliability including vegetation management, severe days, major event days, cyber  
4 and other human-caused attacks, weather variability, low short-circuit strength,  
5 frequency and voltage deviations, equipment failures, supply chain challenges,  
6 generator failures, Transmission, Distribution and Storage System Improvement  
7 Charge improvements, etc. NIPSCO has not projected its 2024 and 2025 reliability  
8 metrics using a seven-year cycle as NIPSCO states in its response to OUCC DR  
9 26-001.<sup>15</sup> Nor has NIPSCO provided a cost-benefit analysis or other evidence  
10 quantifying the additional reliability gains the 7-year cycle would bring even  
11 though the OUCC requested this analysis in OUCC DR 8-017.<sup>16</sup>

12 **Q: Does NIPSCO offset the proposed increase in its vegetation management**  
13 **spend with cost savings expected from fewer outages as a result of**  
14 **transitioning to a 7-year cycle?**

15 A: No. Mr. Cocking does not address offsetting the increased vegetation management  
16 costs with savings from reduced outages. I anticipate the "law of diminishing  
17 returns" applies here, as once critical circuits are cleared and trimmed, additional  
18 efforts may well yield progressively smaller benefits. NIPSCO has not shown that  
19 moving to a 7-year cycle will result in significant incremental improvements over  
20 the current 10-year cycle. When NIPSCO was asked to provide cost-benefit  
21 analyses in discovery, it stated:

22 NIPSCO would like to be at a 7-year trim cycle, however the cycle  
23 is dependent on funding. This is based on the need to reduce tree

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<sup>15</sup> Attachment RS-1, p 10.

<sup>16</sup> Attachment RS-1, pp. 7-9.

1 related outages. The current cycle, 10 years, is not keeping up with  
2 the growth rate of the trees in the region. NIPSCO has also increased  
3 the line clearance specifications for 2025-2027 to push the  
4 vegetation back further from the conductors to reduce re-growth  
5 distance to conductors after trimming.<sup>17</sup>

6 NIPSCO provided no comprehensive cost-benefit analysis that quantifies expected  
7 savings from reduced outages or reliability improvements. Without this data and/or  
8 analysis, it is unreasonable for ratepayers to bear the costs.

### III. RECOMMENDATIONS

9 **Q: Please summarize your recommendations to the Commission.**

10 A: I recommend NIPSCO continue its 10-year trim cycle rather than shifting to the  
11 proposed 7-year trim cycle due to the consistent improvement shown in the last  
12 three years in reliability from the existing cycle. Accordingly, I recommend the  
13 proposed 2025 pro forma Vegetation Management O&M expense of \$29.4 million  
14 not be approved and that NIPSCO's approved 2025 Vegetation Management O&M  
15 budget amount remain at \$26.2 million.

16 **Q: Does this conclude your testimony?**

17 A: Yes.

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<sup>17</sup> Attachment RS-1, pp. 7-8.

**APPENDIX TO TESTIMONY OF**  
**OUCW WITNESS ROOPALI SANKA**

1   **Q:   Please describe your educational background and experience.**

2   A:   I hold a bachelor’s degree in Energy Engineering from Indiana University Purdue  
3       University of Indianapolis. In August 2022, I began my employment with the  
4       OUCW as a Utility Analyst II in the electric division and have provided work on  
5       docketed cases before the Indiana Utility Regulatory Commission, including,  
6       demand side management (“DSM”); evaluation, measurement, & verification  
7       (“EM&V”); Transmission, Distribution, and Storage System Improvement Charges  
8       (“TDSIC”), and certificates of public convenience and necessity (“CPCN”).  
9       Additionally, I attended Scott Hempling’s ‘Fundamentals of Utility Law’ course in  
10      the first quarter of 2023, and I attended the 2022 Indiana Energy Conference in  
11      October 2022, which focused on the current and future challenges facing the energy  
12      market.

13   **Q:   Have you previously testified before the Indiana Utility Regulatory**  
14   **Commission?**

15   A:   Yes.

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**

<b><u>OUCS Request 8-006:</u></b>
Please provide the actual amount spent on vegetation management, broken out by storm expenditures and non-storm expenditures, for January 1, 2024, through September 30, 2024.
<b><u>Objections:</u></b>
<b><u>Response:</u></b>
January 1, 2024 – September 30, 2024 Actual Veg Mgmt Storm Expenditure is \$1,543,521. Vegetation management work during a storm is charged and budgeted within the Storm budget, not within the Vegetation Management budget.
January 1, 2024 – September 30, 2024 Actual Veg Mgmt Non-Storm Expenditure is \$19,820,219, which includes \$413,954 of internal NIPSCO labor.

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**

**OUC Request 8-007:**

Please refer to Mr. Cocking's direct testimony, p. 40, figure 12. Please provide a table of the budgeted and actual vegetation management spend for each calendar year between 2022-2023.

- a) Please provide the budgeted and actual vegetation management spend, for January 1, 2024, through September 30, 2024.
- b) Please provide the budgeted vegetation management spend for 2025.
- c) Please define what "labor salary" means.
  - i) Does this term exclude labor contracts?
  - ii) Are NIPSCO's salaried employees' salaries included in the labor salary amount?
- d) Please explain what costs are covered by the amounts noted in the figure for each year between 2016 to 2025.
- e) Please provide the total vegetation management spend including labor salary for each year between 2016 through 2023.
- f) Please provide the 2024 updated total vegetation management spend including labor salaries.
- g) Please provide the total vegetation management budget including labor salary for each year between 2024 through 2025.
- h) Please provide a breakdown in dollars by amount spent included in rates, amount in TDSIC, and amount in all other sources for each year shown in Fig. 12.
- i) Please provide a breakdown of the total dollars spent each year by transmission, distribution, and other.
  - i) Does this figure reflect TDSIC and O&M? If no, please explain what it represents.
- j) Please refer to pg. 3 of the 2023 Vegetation Management Report pdf in Cause No. 43663 and to Figure 12 in Mr. Cocking's direct testimony. Please explain why there is a difference between the actual total vegetation management spends in the table in the annual report (\$25,682,059) and figure 12 (\$25,148,354).
  - i) Please explain what each of the amounts in both the figure and table represent.

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**

**Objections:**

**Response:**

- a) Please see OUCC Request 8-007 Attachment A.
- b) Please see OUCC Request 8-007 Attachment A. The vegetation management budget in 2025 was set at \$26.2M, but has been increased to a present estimate (PE) of \$27.2M to move toward a 7-year cycle. The annual spend to complete a 7-year cycle is \$29.5M.
- c) Labor Salary is internal NIPSCO Vegetation Management department salaries.
  - i. The numbers in the figure include all labor associated with Vegetation Management vendors performing work for the NIPSCO Vegetation Management department; and
  - ii. NIPSCO's salaried employees are not included in the figure.
- d) The costs in Figure 12 for 2016 through 2023 are total actuals for the department; this includes the following categories: Distribution Maintenance, Distribution Demand, Sub Transmission Maintenance, Transmission Maintenance, Bare Ground treatments (such as inside sub stations and on access drives), Rough Grass right of way maintenance, Landscape Maintenance, Tree Plantings and Work Planning but does not include NIPSCO employee Labor Salaries or Rents and Leases. The costs in Figure 12 for 2024 is the actuals for January through September 2024 and budget amount for October through December 2024. The costs in Figure 12 for 2025 are the projected expense. NIPSCO will file a correction to clarify the costs shown in Figure 12 for 2025.
- e) Please see OUCC Request 8-007 Attachment A.
- f) Please see OUCC Request 8-007 Attachment A.
- g) Please see OUCC Request 8-007 Attachment A.
- h) TDSIC is not included in the amounts provided in subpart (e). TDSIC is tracked separately and is not included in the Vegetation Management budget or spend;
- i) Please see OUCC Request 8-007 Attachment A.
  - i) TDSIC is not included in the amounts provided in subpart (i). The actual spend represents O&M for Distribution Maintenance, Distribution Demand, Sub Transmission Maintenance, Transmission Maintenance, Bare Ground

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**

treatments (such as inside sub stations and on access drives), Rough Grass ROW maintenance, Landscape Maintenance, Tree Plantings and Work Planning.

j) \$25,682,059 includes internal NIPSCO labor salary and Rents and Leases for Vegetation Management. \$25,148,354 does not include internal NIPSCO labor salary or Rents and Leases for Vegetation Management as all Labor and Rents and Leases are included in Adjustments OM 1 and OM 8, respectively.

i) Please see response to subpart (d) regarding Figure 12 from the current testimony. The only difference between the Annual Report table and the testimony figure is that the Annual Report table includes internal NIPSCO employee salaries and rents and leases, while the testimony figure does not.

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**

<b><u>OUCC Request 8-010:</u></b>																																																																																																																											
Please provide NIPSCO's reliability metrics (System Average Interruption Duration Index, System Average Interruption Frequency Index, Customer Average Interruption Duration Index) before the implementation of NIPSCO's vegetation management program.																																																																																																																											
a) Please provide NIPSCO's projected SAIFI, SAIDI, and CAIDI reliability metrics for each calendar year 2024 and 2025.																																																																																																																											
<b><u>Objections:</u></b>																																																																																																																											
NIPSCO objects to this Request on the grounds and to the extent that this Request is vague and ambiguous as the term "before the implementation of NIPSCO's vegetation management program" is undefined such that the nature of information sought is unclear. There has been no period of time in which NIPSCO did not have some form of vegetation management program.																																																																																																																											
<b><u>Response:</u></b>																																																																																																																											
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**Cause No. 46120**  
**Northern Indiana Public Service Company LLC’s**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor’s Eighth Set of Data Requests**

**OUCS Request 8-015:**

Please refer to Table 2 on p. 43 of Mr. Cocking’s direct testimony:

- a) Please define the term “tree outage.”
- b) Please confirm “Major Events” are the same as Major Event Days.
- c) Please explain the difference between Severe Days and Major Events.
- d) What constitutes an outage as listed in the heading of the 2<sup>nd</sup> column?
- e) How many of these tree related outages are caused by trees not within the tree trimming right of way (not within the line clearance requirements)?

**Objections:**

**Response:**

- a) “Tree Outage” is the number of outages which were determined to be tree related.
- b) “Major Events” are the same as “Major Event Days”.
- c) A severe day is defined by 20% of Major Event Day Threshold (TMED) and greater but less than TMED for the daily System Average Interruption Duration Index (SAIDI). Major Event is the daily SAIDI value is greater than or equal to TMED.
- d) A sustained outage is an outage lasting over 5 minutes. (IEEE 1366-2022) NIPSCO considers this as an Outage.
- e) Events = Outage; Tree related outages and customers out with cause codes for outside the tree trimming Right of Way (ROW).

	2021	2022	2023	2024
EVENTS	17	15	14	13
CUST OUT	252	596	471	2,087

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**

**OUC Request 8-017:**

Please refer to pg. 41, lines 9-11 of Mr. Cocking's direct testimony.

- a) Is "approximately 1,328 miles of the system" referring to transmission or distribution circuit line miles?
  - i) If both transmission and distribution, please provide the number of transmission circuit line miles and number of distribution circuit line miles.
- b) Please provide all cost-benefit analyses along with all the data, calculations, and explanations supporting NIPSCO's choice of the 7-year trim cycle
- c) What trim cycle is NIPSCO currently on?
  - i) Please provide all data, analysis, calculations, and explanation for why NIPSCO is on the current trim cycle.
  - ii) Please provide the number of circuit line miles NIPSCO has trimmed. Please provide this figure for both transmission circuit line miles, and distribution circuit line miles, separately.
- d) Is NIPSCO planning on changing the current vegetation management contract?
  - i) If yes, please provide the current vegetation management contract.

**Objections:**

**Response:**

- a) 1,328 miles refers to distribution (12.5 kV and below) and sub transmission miles (34kV and 69kV). Transmission (138kV and above) are separate miles/expenses in the Vegetation Management budget.
- i) The 1,328 miles of the system includes 893 distribution (12.5kV and below) miles and 347 sub-transmission miles (34kV and 69kv) plus 88 miles of capital (capital miles and expenses are tracked outside of O&M budget).
- b) NIPSCO would like to be at a 7-year trim cycle, however the cycle is dependent on funding. This is based on the need to reduce tree related outages. The current cycle, 10 years, is not keeping up with the growth rate of the trees in the region. NIPSCO has also increased the line clearance specifications for 2025-2027 to push the vegetation

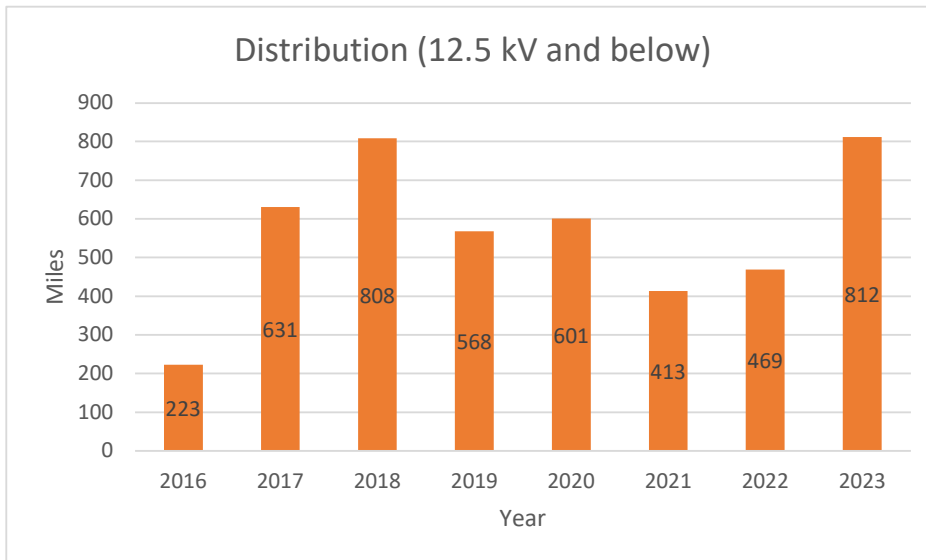
**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**

back further from the conductors to reduce re-growth distance to conductors after trimming.

c) NIPSCO is currently operating on a 10 year cycle.

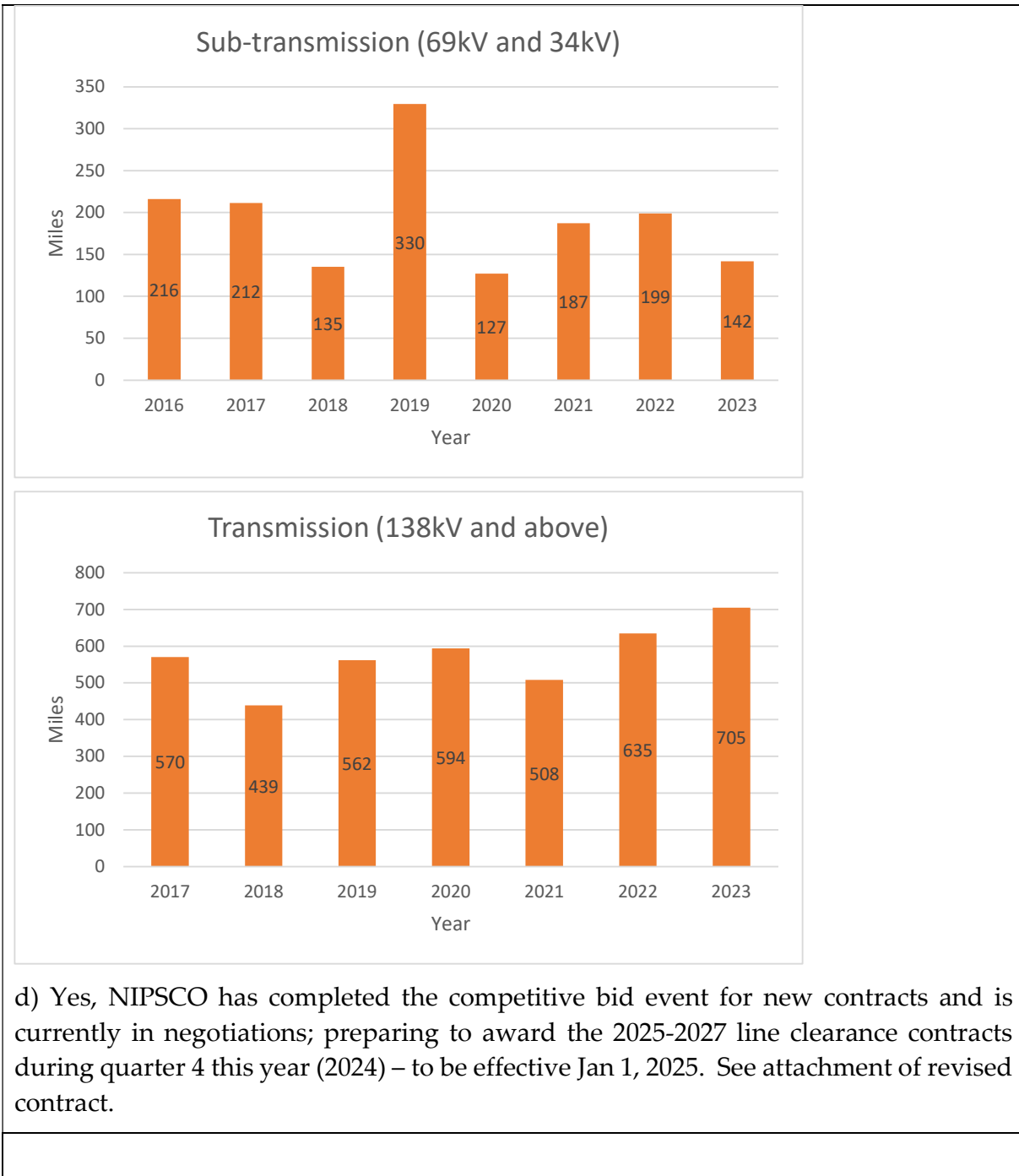
i) NIPSCO calculates the trim cycle based on the average number of miles completed over the previous 3 years divided by the number of distribution and sub transmission line miles on the system.

ii) This data is historical for O&M expenses only as capital expenses are tracked separately.



d. See OUCC Request 8-017 Attachment A for the contract with new specifications for 2025-2027.

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Eighth Set of Data Requests**



**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Twenty-Sixth Set of Data Requests**

**OUCR Request 26-001:**

Please refer to Orville Cocking's direct testimony, page 51, line 13 through page 52, line 6.

- a. Please provide all analysis NIPSCO performed showing the benefit of a 7-year cycle compared to NIPSCO's current 10-year cycle.
- b. Please provide NIPSCO's projected SAIFI, SAIDI, and CAIDI reliability metrics for 2025 using NIPSCO's current 10-year cycle and NIPSCO's proposed 7-year cycle.
- c. Please provide NIPSCO's projected vegetation outages in 2025 using NIPSCO's current 10-year cycle and NIPSCO's proposed 7-year cycle.

**Objections:**

NIPSCO objects to sub-parts (b) and (c) of this Request on the grounds and to the extent that this Request solicits an analysis, calculation, or compilation which has not already been performed and which NIPSCO objects to performing.

**Response:**

Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response:

- a. NIPSCO monitors circuit performance for tree related outages, customers out and Tree SAIFI, both prior to trimming and after trimming. After trimming, tree related outages, customers out, and Tree SAIFI rebounds prior to the end of the 10-year cycle. NIPSCO has also revised the line clearance trimming specifications for additional clearance for the 2025-2027 contract years. With the additional clearance distances and shortened cycle length, we expect the regrowth that results in tree related outages to be addressed prior to the re-growth causing additional outages
- b. NIPSCO's 2025 Projected Reliability Metrics using a 10-year cycle were provided in response to OUCR Request 8-010. NIPSCO has not projected its reliability metrics using a 7-year cycle.
- c. NIPSCO continues to prepare information responsive to this Request and will supplement as soon as it is complete.

**Supplemental Response:**

**Cause No. 46120**  
**Northern Indiana Public Service Company LLC's**  
**Objections and Responses to**  
**Indiana Office of Utility Consumer Counselor's Twenty-Sixth Set of Data Requests**

c. NIPSCO does not project vegetation-related outages. However, given that a 7 year cycle will result in more circuit miles being cleared than a 10 year cycle, it is reasonable to expect fewer vegetation-related outages with a 7 year trim cycle.

**AFFIRMATION**

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



---

Roopali Sanka  
Utility Analyst II  
Indiana Office of Utility Consumer Counsel  
Cause No. 46120  
NIPSCO, LLC

Date: December 19, 2024

## CERTIFICATE OF SERVICE

This is to certify that a copy of the **Indiana Office of Utility Consumer Counselor Public's Exhibit No. 6 Testimony of OUCC Witness Roopali Sanka** has been served upon the following counsel of record in the captioned proceeding by electronic service on December 19, 2024.

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