

**REBUTTAL TESTIMONY OF ROGER A. FLICK, II
DIRECTOR OF JURISDICTIONAL RATE ADMINISTRATION
DUKE ENERGY BUSINESS SERVICES, LLC
ON BEHALF OF DUKE ENERGY INDIANA, LLC
BEFORE THE INDIANA UTILITY REGULATORY COMMISSION**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Roger Flick, and my business address is 1000 East Main Street,
3 Plainfield, Indiana.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Duke Energy Business Services LLC, the service company
6 affiliate of Duke Energy Indiana, Inc. ("Duke Energy Indiana," or "Company") as
7 a Director of Jurisdictional Rate Administration.

8 **Q. ARE YOU THE SAME ROGER FLICK THAT PRESENTED DIRECT
9 TESTIMONY IN THIS PROCEEDING?**

10 A. Yes, I am.

11 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

12 A. The purpose of my rebuttal testimony is to address issues raised by the Indiana
13 Office of Utility Consumer ("OUCC") witnesses John E. Haselden and Brian R.
14 Latham.

15 **Q. WITNESS HASELDEN SUGGESTS THE COMPANY USED A LOAD
16 SHAPE WITH A PRONOUNCED OFF-PEAK CHARGING
17 CHARACTERISTIC AND THAT IS IMPROPER FOR DUKE ENERGY
18 INDIANA. DO YOU AGREE?**

1 A. I do not. The Company proposed residential time-of-use rate in its pending rate
2 case, Cause No. 46038, which included both Off-Peak and Discount periods.
3 Those rates, if approved, should be attractive to electric vehicle ("EV") charging
4 customers and help manage EV charging off-peak.

5 **Q. BOTH WITNESSES HASELDEN AND LATHAM THE COMPANY'S**
6 **MAKE-READY CREDIT PROGRAM ("MRC PROGRAM" OR**
7 **"PROGRAM") DOES NOT BENEFIT CUSTOMERS. DO YOU AGREE?**

8 A. No. While the Company agrees with the OUCC's objective of ensuring program
9 benefits accrue to both participating and non-participating customers, the
10 Company believes the program design and cost-effectiveness tests as presented in
11 witness Perez's testimony satisfactorily address those concerns and ensure the
12 program is beneficial for all customers. Witness Perez, in her direct testimony,
13 also highlights the benefits to safety and grid readiness the program would
14 support - benefits which were either discounted or overlooked in the OUCC's
15 testimony and/or recommendation. In simple terms, denial of this proposal would
16 result in a lose-lose result versus a win-win result for the Company and its
17 customers and would negate the Company's ability and efforts to cater to
18 customers' electrification needs given the increase in EV sales that witness Perez
19 noted in her testimony.

20 **Q. OUCC WITNESS LATHAM PROPOSES ALTERNATIVE**
21 **BOOKKEEPING AND COST RECOVERY TREATMENT IF THE MRC**
22 **PROGRAM IS APPROVED. HOW DO YOU RESPOND?**

1 A. No. The Company has proposed an administratively efficient and reasonable
2 approach to addressing cost collection in this proceeding. Mr. Latham's proposal
3 adds administrative complexity and burden which includes separately measuring
4 and accounting for EV consumption from other electric sales. It would also have
5 the undesirable effect of creating differing bookkeeping and regulatory treatment
6 for subsets of EV charging customers. Under Mr. Latham's proposal, EV make-
7 ready credit customers would have their charging activity recorded in a regulatory
8 asset or liability while EV charging customers who have installed and are using
9 charging equipment on their own, without the Company's knowledge, would have
10 their service recorded and recognized for ratemaking in another manner.

11 **Q. HOW WILL THE COMPANY'S COST RECOVERY PROPOSAL**
12 **IMPACT CUSTOMERS?**

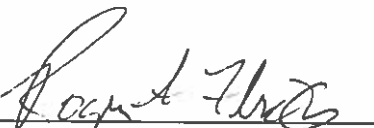
13 A. The Company's make-ready credit proposal is modest. Witness Perez filed
14 Attachment 1-A (JVP) in her direct testimony, which shows the program is
15 estimated to have costs of approximately \$1.1 million during 2028 with preceding
16 years having smaller amounts. These costs are offset by benefits customers will
17 receive from the increased EV charging load as witness Perez explains in her
18 testimony.

19 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

20 A. Yes.

VERIFICATION

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

Signed: 
Roger A. Flick

Dated: September 13, 2024