

**SOUTHERN INDIANA GAS AND ELECTRIC COMPANY  
d/b/a CENTERPOINT ENERGY INDIANA SOUTH  
(CEI SOUTH)**

**DIRECT TESTIMONY  
OF  
STEPHEN R. RAWLINSON  
DIRECTOR, ELECTRIC ENGINEERING**

**ON**

**ELECTRIC TDSIC PLAN**

**SPONSORING PETITIONER'S EXHIBIT NO. 2,  
ATTACHMENT SRR-1**

**DIRECT TESTIMONY OF STEPHEN R. RAWLINSON**

1 **I. INTRODUCTION**

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

3 A. My name is Stephen R. Rawlinson. My business address is 1 North Main Street,  
4 Evansville, Indiana, 47711.

5 **Q. BY WHOM ARE YOU EMPLOYED?**

6 A. I am employed by Southern Indiana Gas and Electric Company d/b/a CenterPoint  
7 Energy Indiana South (“Petitioner”, “CEI South”, or “Company”).

8 **Q. ON WHOSE BEHALF ARE YOU SUBMITTING THIS DIRECT TESTIMONY?**

9 A. I am submitting testimony on behalf of CEI South, which is an indirect subsidiary of  
10 CenterPoint Energy, Inc.

11 **Q. WHAT IS YOUR ROLE WITH RESPECT TO PETITIONER CEI SOUTH?**

12 A. I am the Director of Electric Engineering.

13 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

14 A. I received a Bachelor of Science degree in Mechanical Engineering Technology from  
15 Southern Illinois University at Carbondale in 1990. In 2005, I acquired certification as  
16 a North American Electric Reliability Corporation (“NERC”) system operator at the  
17 reliability coordinator credential level.

18 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

19 A. I began my career with CEI South<sup>1</sup> in 1996. Over the years, I have held positions of  
20 increasing responsibility within Electric Engineering and System Operations. Prior to  
21 becoming Director of Electric Engineering in February 2019, I was Chief Engineer of  
22 Electric Engineering. Before that, I held management positions within Electric  
23 Engineering and Transmission System Operations.

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<sup>1</sup> For the sake of clarity, my testimony refers to CEI South, even though in certain situations, the utility may have been operating under a different name at the time. .

1 **Q. WHAT ARE YOUR PRESENT DUTIES AND RESPONSIBILITIES AS DIRECTOR**  
2 **OF ELECTRIC ENGINEERING?**

3 A. I am responsible for Electric Engineering and Capital Program Management. My  
4 specific responsibilities include electric transmission, substation and distribution  
5 engineering, electric capital program management, electric system planning, and  
6 electric system asset management.

7 **Q. HAVE YOU EVER TESTIFIED BEFORE THE INDIANA UTILITY REGULATORY**  
8 **COMMISSION (“COMMISSION”)?**

9 A. Yes, I have routinely provided testimony before the Commission in CEI South’s semi-  
10 annual filings in Cause No. 44910 related to the Transmission, Distribution, and  
11 Storage System Improvement Charge (“TDSIC”) and its seven-year TDSIC Plan, most  
12 recently for Cause Nos. 44910 TDSIC 12.

13 **II. PURPOSE & SCOPE OF TESTIMONY**

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

15 A. The purpose of my direct testimony is to discuss the capital infrastructure investments  
16 CEI South is including in this Cause that are related to maintaining or enhancing the  
17 safety and reliability of the electric system. My testimony will describe the five-year  
18 plan CEI South developed to make transmission, distribution, and storage system  
19 improvements to its electric transmission and distribution system. Specifically, my  
20 direct testimony: (a) presents CEI South’s 5-Year Electric Transmission, Distribution,  
21 and Storage System Improvement Plan for the period January 1, 2024 through  
22 December 31, 2028 (the “5-Year Plan”, the “2024 – 2028 TDSIC Plan”, the “TDSIC  
23 Plan”, or the “Plan”); (b) explains how the 5-Year Plan was developed; and (c)  
24 describes the components of the TDSIC Plan along with the benefits, need for flexibility  
25 in the Plan, and how the public convenience and necessity require or will require the  
26 Plan. In addition, my direct testimony provides the best estimate of the cost of the  
27 eligible improvements in the Plan and explains why the estimated costs of the eligible  
28 improvements in the Plan are justified by incremental benefits attributable to the Plan.  
29 My direct testimony also explains CEI South’s proposed process for managing and  
30 updating the Plan and confirms CEI South’s intent to comply with the statutory  
31 provisions of Ind. Code ch. 8-1-39 (the “TDSIC Statute”).

1 **Q. ARE YOU SPONSORING ANY ATTACHMENTS IN THIS PROCEEDING?**

2 A. Yes. I am sponsoring the following attachments in this proceeding:

- 3 • Petitioner’s Exhibit No. 2, Attachment SRR-1 (CONFIDENTIAL): Electric  
4 TDSIC Plan

5 **Q. WAS THIS ATTACHMENT PREPARED BY YOU OR UNDER YOUR**  
6 **SUPERVISION?**

7 A. Yes.

8 **III. BACKGROUND**

9 **Q. PLEASE GENERALLY DESCRIBE CEI SOUTH’S ELECTRIC OPERATIONS AND**  
10 **ITS SERVICE TERRITORY.**

11 A. The Company owns, operates, and maintains approximately 4,600 miles of 12.5kV  
12 distribution overhead circuits; 2,600 miles of 12.5kV distribution underground circuits;  
13 566 miles of 69kV transmission lines; 416 miles of 138kV transmission line; 64 miles  
14 of 345kV transmission lines; 110 substations; various communication systems; and  
15 approximately 1,300 MWs of generation to serve approximately 150,000 customers in  
16 seven counties in southwestern Indiana. CEI South maintains transmission  
17 interconnections with five neighboring entities, including Duke Energy Indiana,  
18 Louisville Gas and Electric, Big Rivers Electric Corp., Hoosier Energy, and AES  
19 Indiana.

20 CEI South has been effectively, safely, and reliably providing electric service to the  
21 area for decades and maintains its transmission and distribution electric systems in  
22 good operating condition through maintenance optimization, timely asset  
23 replacements, and opportune construction of new assets in compliance with industry  
24 regulations, prudent investment strategy, and available operational information. A key  
25 component of the recent capital investments has been the TDSIC mechanism which  
26 has allowed CEI South to invest in projects aimed at maintaining and improving the  
27 electric system’s reliability and modernization. While the Company has worked hard  
28 to maintain the system and reliably meet the needs of customers, we also understand  
29 more must be done to improve the region’s energy infrastructure to meet the  
30 requirements of a transforming electric grid. The transition to renewable generation  
31 resources, electrification, and FERC Order 2222 will transform the way the grid is

1 utilized in the coming years. The Company must prepare its transmission and  
2 distribution assets to accommodate renewable generation, Electric Vehicles (“EV”),  
3 and Distributed Energy Resources (“DER”).

4 The programs and methods the Company uses to identify, prioritize, and execute  
5 capital investments to maintain and upgrade its electric infrastructure are discussed  
6 below in my testimony and in Petitioner’s Exhibit No. 3, the Direct Testimony of  
7 Petitioner’s Witness Jason De Stigter.

8 **Q. PLEASE DESCRIBE THE HISTORY OF CEI SOUTH’S TRANSMISSION AND**  
9 **DISTRIBUTION INVESTMENTS THROUGH THE FIRST TDSIC PLAN COVERING**  
10 **THE PERIOD OF JANUARY 1, 2017 THROUGH DECEMBER 31, 2023.**

11 A. The Company’s first TDSIC Plan covered the period of January 1, 2017 through  
12 December 31, 2023 and was approved by the Commission on September 20, 2017  
13 (the “44910 TDSIC Plan”). Along with that initial approval, the Commission also  
14 approved semi-annual filings to update the TDSIC projects and cost estimates,  
15 planned years, and the TDSIC Rider. Currently the 44910 TDSIC Plan is in the final  
16 year of its seven-year plan (2017-2023) and is on track to complete the committed  
17 scope within the \$446.5 million program cap. It is anticipated that CEI South will reach  
18 its program spending cap and complete its 44910 TDSIC Plan in the second half of  
19 2023. CEI South will continue to seek TDSIC treatment for its 44910 TDSIC Plan  
20 projects after approval of the requested relief for the 2024 – 2028 TDSIC Plan. These  
21 are projects that are eligible for TDSIC treatment under Cause No. 44910 but for which  
22 a semi-annual tracker filing will not have been made prior to the filing of the 2024 –  
23 2028 Plan. The Company will continue to track the 44910 TDSIC Plan projects  
24 separately for both internal accounting and engineering purposes from the 2024 –  
25 2028 TDSIC Plan projects, in order to ensure these projects are completed within the  
26 \$446.5 million cap and otherwise satisfy the requirements under the TDSIC Statute to  
27 receive TDSIC treatment under the 44910 TDSIC Plan. Within the 44910 TDSIC Plan,  
28 CEI South has focused its investment on proactively replacing aging, high-risk  
29 equipment throughout its electric system.

1 **Q. PLEASE SUMMARIZE WHAT CEI SOUTH HAS ACCOMPLISHED THROUGH ITS**  
2 **INVESTMENTS UNDER THE 44910 TDSIC PLAN.**

3 A. CEI South’s 44910 TDSIC Plan was a success for its electric system and customers.  
4 Several noteworthy accomplishments from the 44910 TDSIC Plan through the end of  
5 2022 include:

- 6 • Substation Power Transformers Replaced – 36
- 7 • Substation Circuit Breakers Replaced – 135
- 8 • SCADA Systems Upgraded – 51
- 9 • Miles of Distribution Overhead Circuit Rebuilt – 223.3
- 10 • Miles of Distribution Underground Circuit Rebuilt – 124.1
- 11 • Distribution Line Transformers Replaced – 3,275
- 12 • Distribution Structures Replaced/Installed – 8,671
- 13 • Miles of Transmission Circuit Rebuilt – 133.6
- 14 • Miles of Transmission Optical Ground Wire Installed – 163.2
- 15 • Transmission Structures Replaced/Installed – 2,637
- 16 • At the end of the 7<sup>th</sup> Year all the 4kV circuits will be converted to 12.5kV

17 In addition, the processes created and implemented during the execution of the 44910  
18 TDSIC Plan have led to positive understandings and overall improvements across all  
19 areas of the work plan. CEI South’s Electric Program Management Team provides  
20 oversight of the Plan in its entirety through a dedicated Program Manager, Project  
21 Managers and Analysts to monitor progress, expenditures, and schedule adherence  
22 from project design through the completion of construction. The Project Managers  
23 collaborate cross functionally with all of CEI South’s departments that are involved in  
24 project execution. This collaboration ensures compliance with the Plan and provides  
25 recommendations or direction for changes to the Plan. This same methodology will be  
26 applied in CEI South’s 2024-2028 TDSIC Plan. Project selection for the 44910 TDSIC  
27 Plan was primarily based on asset health and condition, targeting the replacement of  
28 aging infrastructure, and improving reliability and modernization of the electric system.  
29 However, in the 44910 TDSIC Plan, the Risk Model was a stand-alone tool used to  
30 identify projects from an asset health and condition perspective. In the 2024 – 2028  
31 TDSIC Plan, a risk model is being used as one factor when calculating incremental  
32 benefits. Further detail around the incremental benefits of the projects can be found in  
33 Petitioner’s Witness De Stigter testimony.

1 **Q. PLEASE SUMMARIZE CEI SOUTH’S REQUESTED RELIEF IN THIS CAUSE.**

2 A. In accordance with Ind. Code § 8-1-39-10(a), Petitioner requests Commission  
3 approval of its 2024 – 2028 TDSIC Plan, which is attached as Petitioner’s Exhibit No.  
4 2, Attachment SRR-1 (CONFIDENTIAL). Specifically, Petitioner requests (a) a  
5 finding that the investments contained in the 2024 – 2028 TDSIC Plan are “eligible  
6 transmission, distribution, and storage system improvements” within the meaning of  
7 Ind. Code § 8-1-39-2; (b) a finding of the best estimate of the cost of the eligible  
8 improvements included in the Plan; (c) a determination that the public convenience  
9 and necessity require or will require the eligible improvements included in the Plan;  
10 and (d) a determination that the estimated costs of the eligible improvements included  
11 in the Plan are justified by incremental benefits attributable to the Plan. If the  
12 Commission determines that the 2024 – 2028 TDSIC Plan is reasonable, Petitioner  
13 requests the Commission approve the Plan and designate the eligible transmission,  
14 distribution, and storage system improvements included in the Plan as eligible for  
15 TDSIC treatment in accordance with Ind. Code Ch. 8-1-39 and authorize Petitioner to  
16 include the improvements in Petitioner’s rate base in any proceeding involving  
17 Petitioner’s rates. Finally, Petitioner requests that the Commission approve  
18 Petitioner’s proposed process for updating the 2024 – 2028 TDSIC Plan in future  
19 TDSIC adjustment proceedings.

20 **Q. PLEASE PROVIDE AN OVERVIEW OF THE STATUTORY AUTHORITY**  
21 **SUPPORTING CEI SOUTH’S REQUEST FOR RELIEF IN THIS PROCEEDING.**

22 A. In addition to Ind. Code § 8-1-2-23, Section 10(a) of the TDSIC Statute provides that  
23 a public utility can petition the Commission for approval of a TDSIC Plan for eligible  
24 transmission, distribution, and storage system improvements. Section 10(b) of the  
25 TDSIC Statute provides that following notice and hearing, and not more than two  
26 hundred ten (210) days after the petition is filed, the Commission shall issue an order  
27 on the petition. The Commission’s order must include the following: (a) a finding of the  
28 best estimate of the cost of the eligible improvements included in the Plan; (b) a  
29 determination whether the public convenience and necessity require or will require the  
30 eligible improvements included in the Plan; and (c) a determination whether the  
31 estimated costs of the eligible improvements included in the Plan are justified by  
32 incremental benefits attributable to the Plan. If the Commission determines that the  
33 2024 – 2028 TDSIC Plan is reasonable, the Commission shall approve the Plan and

1 authorize TDSIC treatment for the eligible transmission, distribution, and storage  
2 system improvements included in the Plan.

3 **Q. PLEASE EXPLAIN WHY CEI SOUTH IS PROPOSING A SUBSEQUENT PLAN TO**  
4 **THE 44910 TDSIC PLAN TO INVEST IN ITS TRANSMISSION AND DISTRIBUTION**  
5 **SYSTEM.**

6 A. CEI South understands that its customers depend upon the electric services that CEI  
7 South provides. Over the years, CEI South has consistently invested in its distribution  
8 and transmission system to provide safe, reliable, and resilient power for its customers,  
9 including the projects completed pursuant to the Company’s 44910 TDSIC Plan.  
10 However, CEI South’s assets continue to age; and new and even more reliable and  
11 new efficient technologies emerge. CEI South recognizes the need to address aging  
12 assets proactively, reduce unplanned outages, and prevent degradation of service for  
13 its customers. So, to preserve and further enhance system safety, reliability, and  
14 resiliency, CEI South carefully considers improvements and upgrades to its electric  
15 system. Such improvements, upgrades, and in some cases new technologies and/or  
16 approaches will reduce the likelihood of equipment failures and unplanned, at times  
17 costly and possibly lengthy, outages. Overall, the TDSIC Plan builds upon strides  
18 taken and the lessons learned from the 44910 TDSIC Plan to further deliver safe,  
19 reliable, and resilient electricity to CEI South’s customers.

20 **IV. OVERVIEW OF 2024 – 2028 TDSIC PLAN**

21 **Q. WHAT IS YOUR ROLE WITH RESPECT TO CEI SOUTH’S TDSIC PLAN?**

22 A. As Director of Electric Engineering for CEI South, I lead the Electric Engineering team  
23 engaged with Operations and other internal and external groups in the development  
24 and execution of the TDSIC Plan. Specifically, Electric Engineering provides integral  
25 support in the creation of the asset identification model used to assess the criticality of  
26 assets and prioritization of projects. My team also directly creates project designs and  
27 estimates or manages external resources utilized in the development of such; as well  
28 as provides guidance in the prioritization and scheduling of all projects included in the  
29 TDSIC Plan; and project and cost control management support for execution of all  
30 distribution, transmission, and substation TDSIC projects.



1 My team has primary responsibility and oversight of Plan updates, including changes  
2 that may result from new asset information or changes to asset condition, revisions to  
3 project estimates as detailed engineering is completed, and adjustments to the TDSIC  
4 Plan schedule resulting from re-prioritization of projects during the five years of the  
5 TDSIC Plan.

6 **Q. PLEASE DESCRIBE THE PURPOSE OF THE TDSIC PLAN.**

7 A. CEI South recognizes the inherent reliability and safety risks in an aging distribution  
8 and transmission system. To preserve and further enhance system safety, reliability,  
9 and resiliency, CEI South carefully considers improvements and upgrades to its  
10 electric system. Such improvements, upgrades, and in some cases new technologies  
11 and/or approaches will reduce the likelihood of equipment failures and unplanned  
12 outages. These improvements increase the reliability and safety of the distribution and  
13 transmission system while better serving our customers. Approval of the TDSIC Plan  
14 and the requested relief will facilitate CEI South in its objective to address aging assets  
15 proactively, consequently preventing degradation of service for our customers and  
16 positioning the Company to respond effectively to the dynamic needs of its evolving  
17 electric system, all of which result in a safer and more reliable and resilient system for  
18 its customers.

19 **Q. PLEASE PROVIDE AN OVERVIEW OF THE 2024 – 2028 TDSIC PLAN THAT CEI  
20 SOUTH IS PRESENTING FOR APPROVAL IN THIS PROCEEDING.**

21 A. CEI South is proposing a five-year Plan, covering the period of January 1, 2024  
22 through December 31, 2028, designed to cost-effectively maintain and enhance CEI  
23 South’s grid reliability and resiliency, manage life-cycle investments from aging  
24 equipment, and modernize CEI South’s grid for long-term customer benefit while  
25 continuing to deliver service safely. The Plan consists of approximately \$454 million  
26 in proposed investments across seven different Programs, including:

- 27 • Distribution 12kV Circuit Rebuild
- 28 • Distribution Underground Rebuild
- 29 • Distribution Automation
- 30 • Wood Pole Replacement
- 31 • Transmission Line Rebuild
- 32 • Substation Rebuild

- 1           • Substation Physical Security

2           Each of these Programs constitutes “eligible transmission, distribution, and storage  
3           system improvements” as defined under Ind. Code § 8-1-39-2 because CEI South is  
4           undertaking them for the purpose of safety, reliability, or system modernization and  
5           they were not included in CEI South’s rate base in its most recent general rate case.  
6           A description of each Program can be found later in my testimony.

7   **Q.   YOU PREVIOUSLY MENTIONED ONE OBJECTIVE OF THE 2024 – 2028 TDSIC**  
8   **PLAN IS GRID HARDENING AND RESILIENCY. PLEASE EXPLAIN.**

9   A.   CEI South recognizes hardening as the ability for the electric system to physically  
10       withstand damages from severe weather or extreme events. Resiliency is one of the  
11       outputs from a hardened system, but resiliency is also impacted by the modernization  
12       of the system assets. A modernized system is a smarter system and allows the grid to  
13       react faster and more effectively to severe events. While a more hardened system  
14       helps prevent damage, a resilient system facilitates quicker recovery when those  
15       damages or outages do occur.

16       A direct benefit of replacing aging assets that have surpassed or are nearing their end  
17       of life is avoiding outages caused by those assets failing. The Company’s engineering  
18       and construction standards have evolved over time since those initial assets were put  
19       into service. The newer standards provide a more hardened system leading to better  
20       resiliency through severe events such as weather. Two examples are larger poles  
21       (moving from Class 4 to Class 2) that have more stringent loading standards and larger  
22       wire that is thicker in diameter that adds strength and capacity to the system. Other  
23       updated standards in substation design include the adding of redundancy for station  
24       power, Direct Current (“DC”) panels, and trip coils on breakers and circuit switchers.  
25       Updated engineering material standards, including replacement of bare concentric  
26       underground cable with jacketed cable, and replacement of electro-mechanical relays  
27       with microprocessor relays, have also added to system hardening and resiliency.

28       Targeted investments in reliability and modernization programs have a direct result in  
29       improving system hardening and resiliency. All seven of the Programs in the TDSIC  
30       Plan support resiliency and hardening of CEI South’s electric system and overall grid.  
31       The replacement of aging assets near or past their expected life with assets meeting

1 newer engineering and material standards will enhance the hardening of our  
2 distribution and transmission system. Modernization projects, such as distribution  
3 automation, supervisory control and data acquisition (“SCADA”) upgrades,  
4 microprocessor relay upgrades and optical ground wire installation increase flexibility  
5 and functionality of the overall electric system. These projects also help promote self-  
6 healing and fault isolation that leads to better resiliency during events.

7 **Q. PLEASE EXPLAIN HOW THE PLAN IS PRESENTED AND ORGANIZED.**

8 A. The TDSIC Plan is presented and organized at both the programmatic and a project  
9 level so that it can be viewed in different ways. It can be viewed by investments across  
10 programs and projects; program type and the projects within each program; and by  
11 year. For further detail on how the projects were identified and then prioritized please  
12 see testimony of Petitioner’s Witness De Stigter.

13 **Q. PLEASE EXPLAIN THE RELIABILITY AND MODERNIZATION ASPECTS OF THE**  
14 **TDSIC PLAN.**

15 A. While the 44910 TDSIC Plan represented a good step forward towards better reliability  
16 and modernization of assets by replacing aging infrastructure, there remains a need  
17 to continue replacing other aging infrastructure that was not included in the 44910  
18 TDSIC Plan. The same need for modernizing older assets with assets that incorporate  
19 the latest technology and ensure system reliability still exists.

20 The 2024 – 2028 TDSIC Plan is designed to maintain and enhance CEI South’s grid  
21 reliability and resiliency, manage life-cycle investments from aging equipment, and  
22 modernize CEI South’s grid for long-term customer benefit while continuing to deliver  
23 service safely. Replacing aging infrastructure and implementing new or upgraded  
24 technology that was not previously available allows the Company to better serve its  
25 customers in a safer way for them, the public, and those that work on the electric  
26 system. In particular, replacement of aging infrastructure to address the causes of  
27 outages, equipment failures, brief interruptions, and enhance controls around  
28 distribution and transmission lines and substation equipment benefits customers in the  
29 long-term by increasing overall safety and reliability. Where applicable CEI South also  
30 incorporated looping into projects that will improve grid resilience by providing  
31 alternate feeds for reenergizing customers during extended outages. By investing in  
32 the assets to ensure proper life-cycle management, the system should provide

1 reduced future reactive/restorative costs to customers from aging equipment failures.  
2 By proactively replacing those assets, the Company will maintain and improve  
3 reliability by lowering the number of outages that customers experience during blue  
4 sky days, extreme weather events, and unexpected system changes. The projects that  
5 have been identified to replace aging assets are designed based on updated  
6 engineering and material standards that help meet the needs for today and the needs  
7 of the future grid. Grid flexibility and optionality are key aspects of the Company’s  
8 overall modernization strategy. A modernized grid will position CEI South to better  
9 meet its customers’ future energy needs by ensuring electric reliability and providing  
10 a flexible, resilient, secure, sustainable and adaptable platform for DER integration  
11 and other consumer benefits.

12 **Q. DOES YOUR TESTIMONY DETAIL EACH OF THE LISTED PROGRAMS?**

13 A. Yes, the programs included in the TDSIC Plan are outlined below:

14 **Distribution 12kV Circuit Rebuild Program:** includes the replacement of: (a)  
15 obsolete and aged conductors, within a protection zone, with higher capacity and  
16 stronger aluminum cables, (b) aging wood poles with poles based on current, more  
17 robust material standards, and (c) other hardware and equipment as needed to satisfy  
18 current engineering and material standards designed to improve reliability. In addition,  
19 CEI South will incorporate looping (circuit ties) with modern switches, where  
20 applicable, that will improve grid resilience by providing alternate feeds for  
21 reenergizing customers during extended outages.

22 **Distribution Underground Rebuild Program:** involves the replacement of  
23 deteriorating underground (“UG”) bare concentric neutral cable with jacketed cable.  
24 The program also includes the replacement of aged conductors, within a protection  
25 zone, with conductor that meets current engineering and material standards. In  
26 addition, CEI South will incorporate looping that will improve grid resilience by  
27 providing alternate feeds for reenergizing customers during extended outages.

28 **Distribution Automation (“DA”) Program:** consists of installing DA capable  
29 equipment to allow automatic switching of customers during an outage event. This  
30 type of equipment can be opened and closed remotely from CEI South’s Control Room  
31 allowing for reduced mobilizations to return the system to normal conditions. The

1 program includes new reclosers, communication devices, and other supporting  
2 equipment. The associated communication and automation can be leveraged in the  
3 future to enable more complex schemes to manage the evolving distribution system  
4 to accommodate EVs and DERs.

5 **Wood Pole Replacement Program:** includes a wood pole treatment and replacement  
6 program that utilizes inspection data of approximately 11,000 poles annually with the  
7 flexibility to address urgent and emergent situations as those are identified.

8 **Transmission Line Rebuild Program:** involves rebuilding aging transmission line  
9 sections to reduce the risk of failure, taking into consideration future communication  
10 and capacity needs. Projects can include reconductoring, wood to steel pole  
11 conversions, and Optical Ground Wire (“OPGW”) installation. The deployment of  
12 OPGW (or fiber optic communications) facilitates substation to substation and  
13 substation to control center communication, and is used in a variety of communications  
14 use cases including high-speed protective relaying, SCADA, and backhaul for  
15 corporate network traffic from power generation locations, service centers,  
16 substations, etc.

17 **Substation Rebuild Program:** consists of rebuilding and replacing obsolete and/or  
18 end of life substation equipment. Assets replaced include transformers, breakers,  
19 relays, communications, and others. Modernized substation engineering designs and  
20 material standards facilitate both flexibility and optionality to manage a modern grid.

21 **Substation Physical Security Program:** addresses the evolving security threat at  
22 its substation facilities by investing in additional security measures. Please see  
23 Petitioner’s Exhibit No. 5 – the Direct Testimony of Petitioner’s Witness Chris Freeman  
24 for further information on these projects.

25 **Q. PLEASE SUMMARIZE HOW CEI SOUTH’S T&D PROJECTS ARE CATEGORIZED.**

26 A. As stated above, CEI South’s TDSIC Plan will be comprised of seven different  
27 Programs. All of the projects within the TDSIC Plan will fall within one of these seven  
28 programs. There are safety, modernization and/or reliability benefits associated with  
29 each one of these programs that are directly aligned with the TDSIC Statute.

1 **Q. DOES THE 2024 – 2028 TDSIC PLAN REQUIRE FLEXIBILITY IN ITS PROJECT**  
2 **PORTFOLIO? PLEASE EXPLAIN.**

3 A. Yes. CEI South will require the ability to move projects already within the five-year  
4 Plan timeline, as well as remove, adjust, or add projects. As explained in more detail  
5 below, CEI South will provide details on any updates to its Plan in its semi-annual  
6 tracker filings.

7 **Q. PLEASE EXPLAIN WHETHER THE 2024 – 2028 TDSIC PLAN WILL INCREASE**  
8 **DISTRIBUTED AND RENEWABLE ENERGY INVESTMENTS IN THE STATE?**

9 A. The Company’s TDSIC Plan will increase and continue to advance the electric grid  
10 design to support renewable investments by the state and by customers. CEI South’s  
11 Distribution Automation (“DA”) program that was started in the 44910 TDSIC Plan is a  
12 great example of this system support. The DA scheme builds out the ability to have a  
13 communication restoration scheme which in turn can assist DER applications to come  
14 back online quicker. CEI South’s 2024 – 2028 TDSIC Plan will carry on that  
15 modernization and increase the system communication and intelligence. Programs in  
16 the TDSIC Plan such as Substation Rebuilds, DA, and some Distribution 12kV  
17 Rebuilds and Transmission Rebuilds directly support this effort. Distributed Energy  
18 Resources could potentially push electricity onto our transmission system although the  
19 system was originally designed for one-way power flow to the customer. Per FERC  
20 Order 2222, utilities will need a host of monitoring and control systems to support the  
21 grid as DER/EV penetration evolves over time. A two-way smart grid is better adapted  
22 to accommodate the evolution of the power system. Circuit tie advancements and  
23 added visibility through DA and distribution upgrades support a two-way smarter  
24 electric grid system.

25 **V. PLAN DEVELOPMENT**

26 **Q. PLEASE SUMMARIZE HOW CEI SOUTH DEVELOPED THE TDSIC PLAN.**

27 A. CEI South, in collaboration with 1898/Burns & McDonnell (“1898”), identified and  
28 prioritized potential Programs and associated Projects that meet the following goals:  
29 maintain and enhance CEI South’s grid reliability and resiliency, manage life-cycle  
30 investments from aging equipment, and modernize CEI South’s grid for long-term  
31 customer benefit while continuing to deliver service safely. Upon identification, the  
32 Programs and associated Projects were subjected to a screening process to validate

1 they met the requirements of the TDSIC Statute. This process ensured that each  
2 Program met the eligibility criteria of new or replacement transmission or distribution  
3 projects and defined purposes such as safety, reliability, system modernization or  
4 deliverability. Further analysis and review ensured that CEI South could provide  
5 necessary estimates and cost benefits. Lastly, CEI South considered whether each  
6 proposed Program met criteria including sufficient detail, the extent to which they  
7 produced incremental benefits, and were unique and feasible. The incremental  
8 benefits analysis is detailed in the testimony of Petitioner’s Witness Jason De Stigter.

9 **Q. PLEASE DESCRIBE ASSETS REVIEWED IN DEVELOPING THE 2024 – 2028**  
10 **TDSIC PLAN.**

11 A. Building upon the capital investments identified in 44910 TDSIC Plan, the 2024 – 2028  
12 TDSIC Plan addresses risks identified and prioritized as early as 2022. In designing  
13 the Plan, CEI South conducted comprehensive reviews of many segments and areas  
14 of its electric system to identify areas of high priority safety; operational and integrity  
15 needs; and areas needing enhanced deliverability.

16 **Q. HOW DID CEI SOUTH DETERMINE WHICH PROJECTS WOULD BE INCLUDED**  
17 **IN THE 2024 – 2028 TDSIC PLAN?**

18 A. Petitioner’s Witness De Stigter explains in further detail the methodology and  
19 processes for how projects were identified for inclusion in the Plan; however, in  
20 general, CEI South’s Engineers, Planners, Field Operations, and System Operations  
21 reviewed the qualifying list of projects for prioritization based on known field conditions,  
22 outages, and load growth. Multiple protection zones were then rolled into a single  
23 Project to align with current construction practices. The consolidation was performed  
24 to gain productivity from reduced mobilization and demobilizations of the workforce  
25 when work is grouped together at the same location. Projects were then reviewed to  
26 identify, with a high level of confidence whether the project could be executed as  
27 proposed. A portfolio of Programs and corresponding Projects was then prioritized to  
28 develop the specific improvements included in the Plan and schedule for executions  
29 in a logical and efficient manner. Except as described later, all Projects that were  
30 identified by the 1898 & Co.’s AssetLens Analytics Engine (“Risk Model”) and included  
31 within the Plan were selected based on a benefit to cost ratio (“BCR”) of 1 or greater.  
32 Those select projects that could not go through the Risk Model because there were  
33 either no assets being replaced or the asset was being replaced for deliverability

1           instead of reliability, include distribution substation expansions, capacitor banks  
2           rebuild/installation, and 12kV rebuilds for new circuits.

3   **Q.   WERE THERE ANY PROGRAMS OR PROJECTS IDENTIFIED IN THE TDSIC**  
4   **PLAN THAT WERE NOT ASSESSED VIA THE RISK MODEL? PLEASE EXPLAIN**  
5   **WHY THE PROGRAMS OR PROJECTS WERE NOT PRIORITIZED THROUGH THE**  
6   **MODEL.**

7   A.   Yes. There were Programs and Projects for which 1898 was unable to monetize the  
8       incremental benefits. The Wood Pole Replacement Program, Substation Physical  
9       Security Program, and a few select other Projects in the other Programs were not  
10      assessed through the Risk Model. The Wood Pole Replacement Program will be  
11      inspection driven for the identification of assets that will be replaced. This Program  
12      involves inspecting 10 percent of wood poles across the CEI South system annually  
13      as part of a 10-year cycle, which is the industry standard. The Company will be  
14      inspecting the poles prior to identification for replacement. As part of the process, poles  
15      that have structural issues will be identified and those that can be restored will be  
16      treated, both internally and externally, to extend pole life. Those poles replaced or  
17      treated will meet the National Electric Safety Code (“NESC”) requirements and CEI  
18      South’s engineering design and material standards. The Substation Physical Security  
19      projects as well the projects identified as deliverability are installation of new assets  
20      and not necessarily replacement of existing assets. These projects are needed to  
21      protect the transmission and distribution system from the threat of terrorist attack. The  
22      harm from interruptions and disruptions from intentional acts of violence are  
23      immeasurable, and so attempting to monetize incremental benefits would be pointless.  
24      Distribution substation expansion projects consist of the installation of power  
25      transformers and high voltage equipment to support required new distribution circuits  
26      for economic growth and switching capacity. Increasing capacity across the system  
27      supports planned switching and future Distribution Automation device installations to  
28      use during an outage event. Distribution capacitor bank projects are being proposed  
29      to either rebuild or install new banks to improve the power factor on the selected 12kV  
30      circuits. Circuits with low or lagging power factor are inefficient and cause the utility to  
31      generate excess power to offset circuit losses. Improving the power factor on the  
32      distribution system will have a cumulative effect of improving the power factor on the



1 transmission system, which reduces the overall power generation demand. For these  
2 reasons, these projects do not lend themselves to be run through the risk model.

3 **Q. ARE ANY TDSIC PLAN INVESTMENTS AND COSTS CURRENTLY REFLECTED**  
4 **IN CEI SOUTH’S RATE BASE IN ITS MOST RECENT BASE RATE PROCEEDING?**

5 A. No. The Commission issued its Order in CEI South’s Rate Case on April 27, 2011.  
6 The Company will file a new base rate case prior to December 31, 2023 as described  
7 by Petitioner’s Witness Rice.

8 **Q. PLEASE DESCRIBE PETITIONER’S EXHIBIT NO. 2, ATTACHMENT SRR-1**  
9 **(CONFIDENTIAL) - THE TDSIC PLAN.**

10 A. The TDSIC Plan provides a list of all proposed projects, a unique project identifier  
11 (work order number), a short project description, the planned year of construction, the  
12 estimated cost of the project, the location of the project, and the program to which it  
13 belongs. As CEI South implements the TDSIC Plan, the exhibit will be updated semi-  
14 annually to identify changes to applicable projects, such as timing (year) or cost  
15 (estimate).

16 **Q. DOES THE TDSIC PLAN INCLUDE PROJECTS FOR WHICH A DISCRETE**  
17 **LOCATION CANNOT BE IDENTIFIED? PLEASE EXPLAIN.**

18 A. Yes. For the Pole Replacement Program, CEI South cannot identify specific project  
19 locations by year. This Program does not have specific locations already identified  
20 because the intent of the Program is to inspect and replace equipment that is deemed  
21 to be replaced; therefore, this Program focuses on inspection and replacement of a  
22 certain number of assets in each year. Although CEI South cannot identify which  
23 specific assets might need replacement until inspections have been completed, the  
24 Company has provided detail about the anticipated replacement level.

25 **Q. DOES THE TDSIC PLAN INCLUDE BOTH CAPITAL AND OPERATION AND**  
26 **MAINTENANCE (“O&M”) EXPENSES? PLEASE EXPLAIN.**

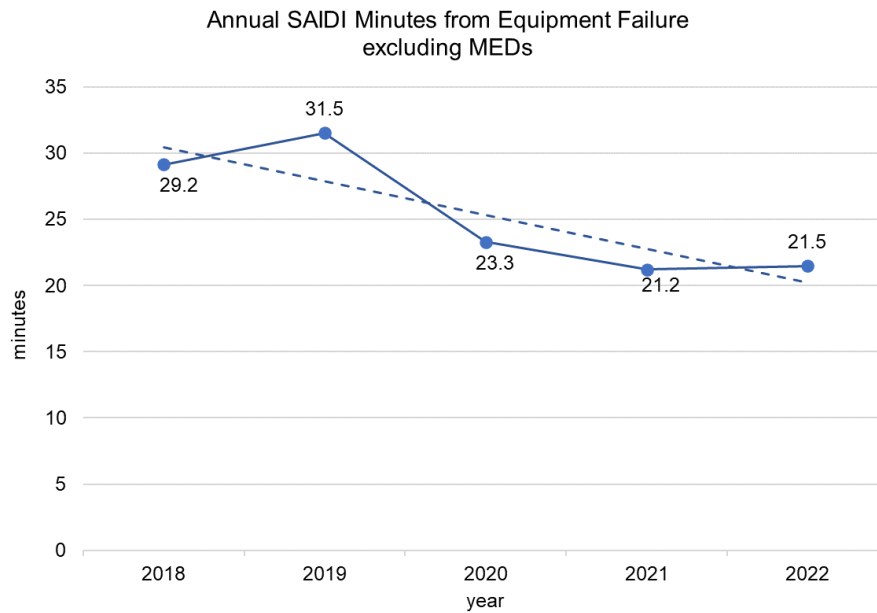
27 A. No. This plan only includes capital costs.

28 **Q. WILL CEI SOUTH USE THE RISK MODEL TO UPDATE THE PLAN?**

29 A. CEI South will not use the Risk Model to update its Plan. However, as described later  
30 in my testimony, the Company may move projects within the Plan period based on  
31 changing system needs or to maximize operational and construction efficiencies.

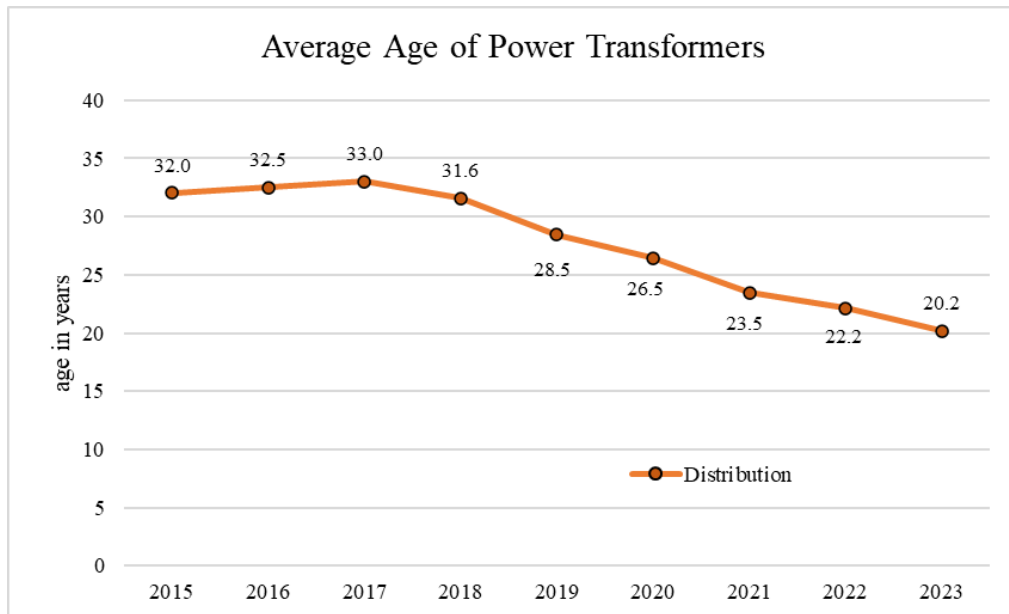
1 **VI. RISK REDUCTION**2 **Q. DID CEI SOUTH ACHIEVE ANY REDUCTION OF RISK THROUGH COMPLETION**  
3 **OF THE PROJECTS IN THE 44910 TDSIC PLAN? PLEASE EXPLAIN.**4 A. Yes. Many of the projects (approximately 95 percent of the plan projects) included the  
5 replacement of aging infrastructure for transmission circuits, substations, and  
6 distribution circuits. Replacement of aging infrastructure reduces the risk of failures  
7 across the system, specifically with investments targeting at-risk equipment. More at-  
8 risk equipment includes infrastructure with higher likelihoods of failure and higher  
9 consequences, specifically risk equals the likelihood or probability of failure multiplied  
10 by the consequence of failure. The 44910 TDSIC Plan included targeting older  
11 equipment, utilizing condition information where applicable while factoring equipment  
12 consequences. Replacement of the at-risk equipment reduces the risk of customer  
13 outages, reactive replacements costs, environmental consequences such as oil spills  
14 from applicable equipment, elevated levels of O&M that generally occur at the end of  
15 an asset’s life, and re-replacement costs when non-standard equipment cannot be  
16 replaced to standard after a failure. Additionally, replacement of at-risk equipment  
17 mitigates the risk of catastrophic failure types that can cause serious injuries to  
18 personnel. This is especially the case for substation assets where high levels of energy  
19 are concentrated in a more confined area. While all electrified equipment in a  
20 substation poses these types of risk, older equipment is more likely to fail  
21 catastrophically exposing Company personnel to risk. Outside of substations,  
22 replacing older equipment on transmission and distribution circuits decreases the risk  
23 of failure to the public.24 Figure SRR-1, below, illustrates CEI South’s historical reliability performance for  
25 customer outages associated with equipment failure. The performance trend  
26 illustrates that the investments CEI South have made in its 44190 TDSIC Plan have  
27 mitigated equipment failure risks while improving customer reliability.

**Figure SRR-1 – Annual System Average Interruption Duration Index (SAIDI)  
Minutes from Equipment Failure excluding Major Event Days (MEDs)**

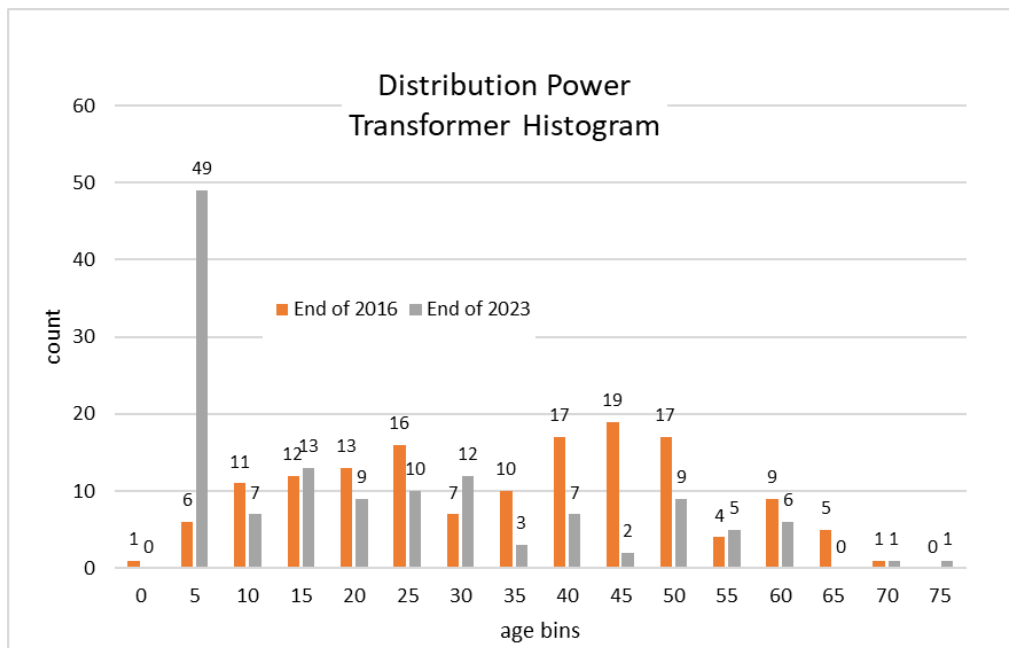


1 Additionally, Figure SRR-2 and SRR-3 illustrate how CEI South’s investments have  
2 addressed aging infrastructure risks in a tangible way. Prior to CEI South’s 44190 TDSIC  
3 Plan investments, the Company was addressing substation power transformer failures in a  
4 largely reactive fashion. The Company’s proactive investments in high-consequence  
5 substation equipment have reduced reactive operational costs and have increased overall  
6 customer reliability.

**Figure SRR-2 – Average Age of Distribution Substation Power Transformers**



**Figure SRR-3 – Distribution Substation Power Transformer Histogram**



1 **Q. PLEASE SUMMARIZE CEI SOUTH’S EXPECTATIONS RELATED TO RISK**  
2 **REDUCTION UNDER THE 2024 – 2028 TDSIC PLAN.**

3 A. The goal of the 2024 – 2028 TDSIC Plan is the same as the 44910 TDSIC Plan which  
4 is to replace aging assets at or beyond their expected life prior to the asset failing, as  
5 well as to install certain new assets. Even with the risk reductions achieved in the  
6 44910 TDSIC Plan, and as stated earlier, there are still many assets on the system  
7 that need replacement. The additional investment into these assets in the TDSIC Plan  
8 will further increase system reliability and resiliency while better serving our customers  
9 safely.

10 **Q. EARLIER YOU TESTIFIED THAT THE 2024 – 2028 TDSIC PLAN WILL REQUIRE**  
11 **FLEXIBILITY THROUGHOUT THE LIFE OF THE PLAN. PLEASE EXPLAIN HOW**  
12 **CEI SOUTH ANTICIPATES THAT THE 2024 – 2028 TDSIC PLAN WILL CHANGE**  
13 **OVER THE PLAN PERIOD.**

14 A. CEI South has developed a detailed TDSIC Plan that identifies specific projects to be  
15 completed in specific years. CEI South recognizes the need for flexibility within the  
16 Plan as paramount, to stay responsive to changing risks to the ever-evolving electric  
17 system and to maximize the investments the Company is proposing. CEI South will  
18 evaluate and, as needed, reprioritize the proposed projects within the planned years  
19 and update the TDSIC Plan in the semi-annual filings to reflect any changes needed.

20 In addition to moving projects within the five-year Plan as system needs change, it is  
21 also important to have the ability to move a project into the five-year Plan from the  
22 Potential Substitution Project (“PSP”) list. The PSPs may be selected to move into the  
23 Plan as an output of the Company’s constant assessment of the electric grid and its  
24 associated risks. The PSPs underwent the same engineering and estimating process  
25 as the projects in the five-year Plan. That methodology will be later explained in my  
26 testimony.

27 **Q. PLEASE DESCRIBE THE TYPE OF PROJECTS LISTED AS POTENTIAL**  
28 **SUBSTITUTION PROJECTS (“PSP”).**

29 A. During the project identification process, there were more assets identified for  
30 replacement than the Company could include within the five-year Plan. Although the  
31 assets and projects were prioritized as stated earlier to create the Plan, there are still  
32 other assets that carry a similar risk. Therefore, CEI South is proposing a PSP list that

1 can be used to substitute previously planned projects to provide additional flexibility.  
 2 A PSP may be used as a replacement for one of the projects within the five-year Plan  
 3 if a risk is identified. This may be a result of changed system needs, operational needs  
 4 due to reliability or deliverability issues, unplanned asset failures, or to maximize  
 5 project investments. Such flexibility allows the Company to provide the expected  
 6 benefits that its customers require. The PSPs should be considered part of the TDSIC  
 7 Plan as eligible projects to be included as needed. While the PSP is a good tool  
 8 providing additional flexibility to the Company in the execution of its 2024 – 2028  
 9 TDSIC Plan, it is possible that changing system or operational needs could require  
 10 CEI South to identify and prioritize a project that is not included on the PSP list and to  
 11 seek approval of that project in a semi-annual tracker filing as permitted under Ind.  
 12 Code § 8-1-39-9.

13 **Q. WILL THE POTENTIAL SUBSTITUTION PROJECTS BE A DOLLAR-FOR-DOLLAR**  
 14 **MATCH OF THE PROJECT IT IS SUBSTITUTED FOR?**

15 A. No. Each project has a unique detailed cost estimate, and the likelihood that the PSP  
 16 will have the same estimated cost is low.

17 **VII. COST ESTIMATES**

18 **Q. PLEASE DESCRIBE THE ESTIMATED COST OF THE TDSIC PLAN.**

19 A. Table SRR-1, below, shows the estimated cost of the TDSIC Plan by Program and  
 20 Year, which is approximately \$454 million. Please refer to the confidential workpapers  
 21 included with my testimony for the Electric TDSIC Plan Cost Estimates, which provide  
 22 a more detailed view of the estimate of each individual project, totaling approximately  
 23 \$454 million.

**Table SRR-1: Estimated Cost by Program and Year**

Program	2024	2025	2026	2027	2028	Grand Total
12kV Circuit Rebuild	\$19,695,491	\$18,644,941	\$17,401,372	\$25,179,347	\$17,871,594	\$98,792,745
Distribution Automation	\$2,738,464	\$2,240,791	\$3,930,190	\$4,721,325	\$6,008,298	\$19,639,067
Physical Security	\$5,331,314	\$5,819,113	\$929,825	\$967,018	\$952,729	\$14,000,000
Substation Rebuild	\$21,218,865	\$19,882,589	\$21,204,683	\$23,613,907	\$17,601,027	\$103,521,070
Transmission Line Rebuild	\$23,257,197	\$25,548,396	\$27,450,049	\$19,202,128	\$31,694,984	\$127,152,752
Underground Rebuild	\$9,089,984	\$9,683,284	\$9,013,706	\$9,283,294	\$8,824,098	\$45,894,366
Wood Pole Replacement	\$12,000,000	\$12,000,000	\$9,000,000	\$6,000,000	\$6,000,000	\$45,000,000
<b>Grand Total</b>	<b>\$93,331,314</b>	<b>\$93,819,113</b>	<b>\$88,929,825</b>	<b>\$88,967,018</b>	<b>\$88,952,729</b>	<b>\$454,000,000</b>

1 **Q. PLEASE EXPLAIN THE METHODOLOGY USED BY CEI SOUTH TO DEVELOP**  
2 **CRITERIA FOR ESTIMATES OF PROJECTS THAT COMPRISE THE TDSIC PLAN.**

3 A. CEI South’s methodology for developing estimates was a thorough process which  
4 included both internal and external subject matter experts (“SME”). The Company  
5 started with the project identification and selection process as discussed prior, and in  
6 Petitioner’s Witness De Stigter’s testimony. Over 5,000 prospective projects were  
7 identified as an outcome of that process and CEI South intends to complete 319  
8 projects within the five-year Plan. An additional 114 projects were identified as PSPs.  
9 The 423 projects, outside of the Pole Replacement Program and a portion of the  
10 Substation Physical Security Upgrades, have detailed cost estimates. Initially CEI  
11 South reviewed each Project’s associated scope of work and leveraged historical cost  
12 information to create a high-level preliminary estimate. The Company then grouped  
13 these Projects into tentative planned years by Program using the preliminary estimates  
14 along with an expected annual Plan budget. As a result, a draft five-year Plan by year  
15 was created. Then, each Project within the complete TDSIC Plan was estimated to  
16 follow the recommended practices of AACE International (“AACE”), formerly  
17 Association for the Advancement of Cost Engineering International.

18 **Q. PLEASE EXPLAIN WHAT AACE IS AND WHY CEI SOUTH USED AACE’S**  
19 **RECOMMENDED PRACTICES FOR CLASSIFYING THE ESTIMATES.**

20 A. AACE is an association dedicated to furthering the concepts for total cost management  
21 and cost engineering. The association is a recognized leader in the field of cost  
22 estimating and has published many guides and recommended practices referenced  
23 and utilized by a variety of industries to establish standardized criteria and ranges for  
24 project estimates. CEI South understands the need to provide accurate estimates with  
25 the appropriate level of precision for the TDSIC Plan and the AACE’s recommended  
26 practices establish a well-known and trusted framework to accomplish this objective.  
27 AACE specifies five estimate classes, with Class 1 estimates representing those  
28 projects that have the greatest level of detail and an accuracy range of -10% to 15%  
29 and Class 5 having the least amount of detail with an expected accuracy range of -  
30 50% to 100%.

1 **Q. PLEASE DESCRIBE THE AACE COST ESTIMATES USED FOR THE PROJECTS**  
 2 **IN CEI SOUTH’S TDSIC PLAN.**

3 A. With the exception of the Wood Pole Replacement Program and the five Substation  
 4 Physical Security Surveillance System Projects for which I will describe the estimating  
 5 process below, all Projects, including PSPs, have a unique estimated cost at the AACE  
 6 Class 2 or Class 4 accuracy level. Projects planned to be completed in the first two  
 7 years of the TDSIC Plan were designed to AACE Class 2 criteria and the remaining  
 8 projects, including PSPs, have been designed to AACE Class 4 estimate criteria. Class  
 9 2 estimates, which have accuracy ranges of -15% to +20%, balance the level of detail  
 10 and confidence in design with appropriate engineering resource utilization to ensure  
 11 accurate estimates and work plans are developed for projects to be executed in the  
 12 next two years. Class 4 estimates have an accuracy range of -30% to +50% and are  
 13 appropriate for projects completed beyond the first two-years by balancing a  
 14 reasonable level of work scope detail and estimate accuracy while effectively utilizing  
 15 engineering resources. The following table describes the characteristics of Class 4  
 16 and Class 2 cost estimates:

**Table SRR-2: Characteristics of Class 4 and Class 2 Cost Estimates<sup>2</sup>**

	PRIMARY CHARACTERISTIC	SECONDARY CHARACTERISTIC		
ESTIMATE CLASS	MATURITY LEVEL OF PROJECT DEFINITION DELIVERABLES Expressed as % of complete definition	END USAGE Typical purpose of estimate	METHODOLOGY Typical estimating method	EXPECTED ACCURACY RANGE Typical variation in low and high ranges
<b>Class 4</b>	1% to 15%	Study or feasibility	Equipment factored or parametric models	L: -15% to -30% H: +20% to +50%
<b>Class 2</b>	30% to 75%	Control or bid/tender	Detailed unit cost with forced detailed takeoff	L: -5% to -15% H: +5% to +20%

<sup>2</sup> The above table has been re-produced using data from “AACE International Recommended Practice No.18R-97: COST ESTIMATE CLASSIFICATION SYSTEM - AS APPLIED IN ENGINEERING, PROCUREMENT, AND CONSTRUCTION FOR THE PROCESS INDUSTRIES, Rev. November 29, 2011; [http://www.aacei.org/toc/toc\\_18R-97.pdf](http://www.aacei.org/toc/toc_18R-97.pdf)”



1 This level of detail is consistent with the requirements of the TDSIC Statute for the  
2 best estimate. Designing all projects to a Class 2 accuracy level is not an effective or  
3 efficient use of resources due to potential changes in work scope and fluctuating  
4 material and labor costs that occur as time passes. The Class 4 estimates will be  
5 refined about a year in advance of execution and then updated in the TDSIC Plan.  
6 With these criteria established, the estimates were developed with a combination of  
7 internal and external engineering resources using CEI South’s engineering systems  
8 and standards.

9 **Q. PLEASE EXPLAIN WHETHER CEI SOUTH ENGAGED AN EXTERNAL FIRM TO**  
10 **ASSIST WITH THE DEVELOPMENT AND SUPPORT OF THE TDSIC PLAN.**

11 A. Yes. CEI South will incur an estimated \$4,059,781 million in costs with external firms,  
12 consisting of plan development, engineering and cost estimating, incremental benefit  
13 analysis and case support. This includes the estimated costs of this proceeding.

14 **Q. PLEASE DESCRIBE THE ENGINEERING FIRM USED TO DEVELOP THE COST**  
15 **ESTIMATES.**

16 A. CEI South used 1898 and CHA Consulting (“CHA”) to develop the initial cost  
17 estimates. Both are engineering, design and consulting firms. 1898 completed  
18 estimates for transmission and substation projects. CHA assisted in providing  
19 estimating services for distribution projects.

20 **Q. PLEASE EXPLAIN HOW THE PROJECT COST ESTIMATES WERE DEVELOPED.**

21 A. The process used for all project cost estimations considered material and labor  
22 quantities associated with the defined project scopes of work and CEI South’s  
23 Engineering and Construction Standards. All estimators, whether internal CEI South  
24 or external 1898 or CHA resources, used a consistent set of base cost assumptions  
25 including appropriate labor rates, material costs, and other factors such as complexity  
26 of the work and location. Supplementing these base assumptions were additional  
27 activities and data sources:

- 28 • Site visits with engineering and operations teams to assess locational factors  
29 including accessibility and other physical constraints. Where site visits were not  
30 completed, aerial photography or geospatial data was utilized to assess locational  
31 factors;
- 32 • Costs of recently completed projects of a similar scope;

- 1 • National Electrical Contractors Association (“NECA”) Manual of Labor Units;
- 2 • Material and equipment costs from CEI South’s inventory management system
- 3 supplemented as needed with recent pricing from vendors that supply electric
- 4 equipment to CEI South;
- 5 • Overhead costs and labor and material loadings from CEI South’s accounting
- 6 department; and
- 7 • For transmission and substation projects, labor and material data from similar
- 8 projects previously estimated and/or completed by 1898 was considered in the
- 9 development of estimates.

10 The specific activities and work items necessary to complete each project were  
11 identified and documented in the work scope. Labor and material costs associated  
12 with each activity were applied to the appropriate units of the activity to be completed.  
13 Labor rates were determined from historical project information and regional labor rate  
14 information provided by 1898. Material costs were estimated based on historical  
15 project information or quotes from suppliers. The detailed cost estimates include  
16 standard overhead costs (administration, general, engineering, supervision, and  
17 material loadings). The total cost for each project is found on the summary work paper,  
18 which include the detailed cost estimates in addition to contingency and escalation.

19 As explained earlier in my testimony, Projects in years one and two of the TDSIC Plan  
20 were defined to the level necessary to ensure estimates were sufficiently detailed to  
21 comply with AACE Class 2 accuracy ranges. Estimates for transmission, substation  
22 and distribution projects planned for years three through five were primarily developed  
23 to the level necessary to ensure estimates were sufficiently detailed to comply with  
24 AACE Class 4 accuracy ranges.

25 **Q. PLEASE EXPLAIN HOW THE ESTIMATES FOR DIRECT CAPITAL COSTS WERE**  
26 **DEVELOPED.**

27 A. CEI South worked with 1898 and CHA to utilize previously completed projects of  
28 similar size and scope, quotes from material vendors and SME knowledge of  
29 constructing projects in southwest Indiana to determine the direct capital costs for  
30 project estimation.

1 **Q. PLEASE EXPLAIN HOW THE INDIRECT CAPITAL COSTS WERE DEVELOPED.**

2 A. The Company reviewed historical indirect capital costs in addition to long-term  
3 forecasted capital investments to derive a projected indirect percentage. That  
4 percentage was utilized in each project cost estimate. CEI South used 12% for indirect  
5 capital costs in the Plan.

6 **Q. PLEASE EXPLAIN WHETHER THE DETAILED COST ESTIMATES INCLUDE  
7 ESCALATION TO REFLECT INFLATION BASED ON THE YEAR THE PROJECT IS  
8 PROPOSED TO BE CONSTRUCTED.**

9 A. The detailed cost estimates do not include escalation. Escalation associated with  
10 inflation of materials, labor, and services is calculated on each project’s summary work  
11 paper. The summary work paper therefore shows total project cost. Not having the  
12 escalation on the detailed cost estimate eliminates the need to create a new detailed  
13 cost estimate if projects were to change years. CEI South worked with 1898, who  
14 utilized various economic, and inflation forecast information, to determine the short  
15 term escalation at 4% per year starting in 2024 through 2028.

16 **Q. PLEASE EXPLAIN CONTINGENCY.**

17 A. AACE has defined contingency as the amount added to an estimate to allow for items,  
18 conditions, or events for which the state, occurrence, or effect is uncertain and that  
19 experience shows will likely result, in aggregate, in additional costs.

20 **Q. PLEASE EXPLAIN WHAT, IF ANY, CONTINGENCY IS INCLUDED IN THE COST  
21 ESTIMATES.**

22 A. CEI South has not included contingency into each detailed cost estimate, however it  
23 can be found on each project’s summary work paper. The contingency applied to  
24 projects was based on the amount of detail and confidence in the scope of work and  
25 design to ensure accurate estimates were developed for projects. CEI South used  
26 12.5% contingency on projects in years 2024 – 2025 and 17.5% contingency on  
27 projects for years 2026 – 2028 and PSPs.

28 **Q. PLEASE EXPLAIN HOW CONTINGENCIES ARE USED TO IMPROVE PROJECT  
29 ESTIMATES.**

30 A. The percentage of contingency added to each project’s summary work paper was  
31 determined by the comprehensiveness of the scope of work, level of engineering,

1 complexity of the project, and site condition detail. As stated above, the same  
2 percentage of contingency was not applied to all projects. AACE states that adding  
3 contingency increases the probability of underrunning the final estimate value and  
4 decreases the probability of overrunning the final estimate value. Contingencies are  
5 an applicable element of project estimates. The use of contingencies is standard  
6 practice throughout the utility industry to capture costs for unknowns which often occur  
7 and is required for the Company to create the best estimate of costs of eligible  
8 improvements.

9 **Q. PLEASE EXPLAIN WHY IT IS IMPORTANT TO INCLUDE CONTINGENCY IN BEST**  
10 **ESTIMATE.**

11 A. In order for CEI South to submit a best estimate of the cost, contingency has to be  
12 included. Submitting a best estimate is required by the TDSIC Statute. The Company  
13 knows there are always unknowns and risk is inherent with all projects and  
14 contingency is added to cover that unidentified variable. The contingency added to an  
15 estimate is included for items, conditions, or events for which the occurrence or effect  
16 is uncertain and that historically results in additional costs.

17 **Q. PLEASE EXPLAIN WHETHER INCLUSION OF CONTINGENCY IS CONSISTENT**  
18 **WITH THE COMMISSION’S FINDINGS RELATING TO THE “BEST ESTIMATE” OF**  
19 **COSTS UNDER THE TDSIC STATUTE.**

20 A. Yes. When determining whether a company has presented the best total cost estimate  
21 of project costs under the TDSIC Statute, the Commission has repeatedly found that  
22 inclusion of contingency is necessary to be considered the “best estimate” of costs of  
23 eligible improvements. For example, in Cause No. 45612 related to CEI South’s Gas  
24 CSIA/TDSIC Plan, in response to challenges about the inclusion of contingency as  
25 part of project cost estimates from certain parties, the Commission found that the  
26 inclusion of contingency is “reasonable and appropriate in establishing a best cost  
27 estimate . . . .”<sup>3</sup> Similarly, in two other 2020 orders, the Commission found that “the  
28 exclusion of contingency in the cost estimate would be unreasonable and would not  
29 establish the best cost estimate as required by the TDSIC Statute.”<sup>4</sup> Each project’s

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<sup>3</sup> Commission order in Cause No. 45612, issued April 20, 2022, at p. 16 (citing orders in Cause No. 45330 and Cause No. 45183).

<sup>4</sup> Commission order in Cause No. 45330 at p. 23, issued July 22, 2020 and Commission order in Cause No. 45264 at pp. 22-23, issued March 4, 2020. In Cause No. 45330, the Commission also found that “the level of contingency reflected in [NIPSCO’s] cost estimates is reasonable.” 45330 Order at p. 23.

1 total cost estimate, which will include contingency, can be found on their respective  
2 summary work paper.

3 **Q. WHAT IS THE DIFFERENCE BETWEEN CONTINGENCY AND AACE CLASS**  
4 **ESTIMATE RANGES?**

5 A. The contingency added to a project’s summary work paper is included for items,  
6 conditions, or events for which the occurrence or effect is uncertain and that  
7 experience shows will likely result in additional costs. AACE Class estimate ranges  
8 represent the expected accuracy range of the project according to the Class it is  
9 estimated to. The expected accuracy range for any of the submitted estimates is  
10 expected to be within the ranges defined in the given Class. CEI South has stated that  
11 years 2024 and 2025 are estimated to AACE Class 2 accuracy and years 2026 – 2028  
12 are estimated to AACE Class 4 definition.

13 **Q. IS IT COMMON ESTIMATING PRACTICE TO INCLUDE BOTH CONTINGENCY**  
14 **AND THE APPLICATION OF CLASS ESTIMATE RANGES?**

15 A. Yes. A cost estimate is a prediction of the final, “most likely” cost of a project to be  
16 completed in the future. This prediction carries risk and uncertainty which the estimate  
17 ranges attempt to address by establishing potential minimum and maximum project  
18 costs based on the level of definition of the project work scope. Contingency is a  
19 necessary component of the project cost which is intended to address items that  
20 cannot be quantified at the current level of project definition but will be necessary to  
21 complete the project. The contingency enhances confidence that the project final costs  
22 will be within the upper and lower limits of the estimate range.

23 **Q. PLEASE EXPLAIN THE LEVEL OF DETAIL INCLUDED IN THE COST ESTIMATES.**

24 A. CEI South has created a detailed cost estimate for each Project, including PSPs, for  
25 all Programs within the TDSIC Plan except the Wood Pole Replacement Program and  
26 the five Projects in the Substation Physical Security Program. The Wood Pole  
27 Replacement Program and Substation Physical Security Surveillance System Projects  
28 do not represent a specific location and therefore have an estimated cost at the  
29 Program level by planned year but do not have unique projects identified with an  
30 associated estimated cost for this filing. For all other projects, each detailed cost  
31 estimate includes a line-item breakdown of the cost including engineering, contract  
32 labor, material, construction and material loadings, land, easements, and survey work

1 as applicable. As stated prior, while the individual project cost estimates do not contain  
2 escalation or contingency, escalation and contingency can be found on the project  
3 summary work paper and is included in the total best estimate. A comprehensive list  
4 of the best estimates of the TDSIC Plan can be found in Petitioner’s Exhibit No. 2,  
5 **Attachment SRR-1 (CONFIDENTIAL).**

6 **Q. PLEASE EXPLAIN WHETHER ANY PROJECTS WERE ESTIMATED**  
7 **DIFFERENTLY.**

8 A. All projects as part of the TDSIC Plan, including PSPs, followed the same estimating  
9 process except for five Projects in the Substation Physical Security Program and the  
10 Wood Pole Replacement Program as discussed earlier in my testimony. There are no  
11 individual projects identified for the Wood Pole Replacement Program. Those projects  
12 will be identified through the inspection-based process for replacement.

13 **Q. WHAT STEPS, IF ANY, DID CEI SOUTH TAKE TO ASSESS THE ACCURACY OR**  
14 **COMPLETENESS OF THE ESTIMATES?**

15 A. The Company used internal engineering resources to review and validate all project  
16 cost estimates including PSPs that were produced by third party engineering firms.  
17 Information reviewed includes the scope of work identified, costs of equipment and  
18 materials, labor productivity assumptions, labor rates, historical data and quotes for  
19 recent similar projects. The reviews found these items to be accurate and complete in  
20 accordance with the AACE guidelines for Class 4 and Class 2 detailed cost estimates.

21 **Q. ARE THE ESTIMATED COSTS OF THE ELIGIBLE IMPROVEMENTS INCLUDED**  
22 **IN THE TDSIC PLAN CEI SOUTH’S BEST ESTIMATE? PLEASE EXPLAIN.**

23 A. Yes. As described in my testimony, the estimated costs of the eligible improvements  
24 included in the 2024 – 2028 TDSIC Plan represent CEI South’s best estimate of the  
25 eligible improvements.

26 **Q. PLEASE DISCUSS WHETHER CEI SOUTH WILL MAKE ANY INVESTMENTS TO**  
27 **ITS T&D SYSTEM THAT ARE NOT INCLUDED IN THE TDSIC PLAN.**

28 A. CEI South expects that investments related to new business, public improvement,  
29 storm restoration, public facility damages, among other needs, will continue to occur  
30 outside of this Plan. These investments include new T&D infrastructure extensions  
31 and locations and the installation of new customer service lines.

1 **Q. PLEASE EXPLAIN HOW THE TDSIC PLAN/PROJECTS ARE BUDGETED.**

2 A. CEI South performs an annual budgeting process that includes various internal  
3 stakeholders from field operations, fleet, facilities, finance, and engineering to develop  
4 and maintain the capital investment plan. Engineering has overall responsibility for the  
5 comprehensive T&D capital investment plan. The 2024-2028 TDSIC Plan is a  
6 component of the overall T&D capital investment plan.

7 The process begins with a review and update of the ten-year high-level capital budget  
8 that incorporates financial targets and projected available capital funding. The ten-year  
9 budget is primarily populated with spending categories and “program” investments  
10 such as TDSIC, new business and public improvement, rather than specific individual  
11 projects. High level adjustments are made to years six through ten while years one  
12 through five are reviewed and revised, incorporating additional detail in the spending  
13 categories such as specific known individual capital projects, where applicable or  
14 available.

15 The TDSIC Plan will be managed at total Plan and Program level. The projects that  
16 fall within the seven TDSIC Programs will be reviewed a year in advance of  
17 construction and updated accordingly based on final project scope, material costs, and  
18 construction bids. This review can result in adjustments to the individual Project costs  
19 and in aggregate may impact the annual TDSIC Plan.

20 **Q. DOES CEI SOUTH MANAGE ITS CAPITAL INVESTMENTS AT THE PROJECT OR**  
21 **WORK ORDER LEVEL?**

22 A. While CEI South endeavors to manage costs at the work order level, various factors  
23 make this challenging: many of the assets were installed decades ago and historical  
24 information can be incomplete, environmental conditions vary, unforeseeable conflicts  
25 arise with below-ground facilities, site restoration and traffic control requirements vary,  
26 etc. Construction bids are also a significant influence on project cost management.  
27 Bids generally are in close alignment with estimated labor, but in some cases can be  
28 significantly higher or lower than estimated labor due to resource constraints, industry  
29 climate, perceived work order complexity, etc. This can result in adjustments to  
30 individual work order estimates and in aggregate may impact the annual investment  
31 plan to account for increased or reduced work order costs, i.e. work orders may be  
32 postponed, or other work orders added based upon overall bid results.

1 CEI South manages TDSIC, other system improvement, public improvement, and new  
2 business work orders at both project and work order levels – balancing the need for  
3 individual work orders against the annual budget for those categories of work. Public  
4 improvement and new business investments are initiated by customers or other third  
5 parties. As described previously, the budgets for these categories are based primarily  
6 on historical data. Variance of actual expenditures from Plan, while typically small,  
7 can be significant in any given year due to external factors such as the state of the  
8 economy, housing market, interest rates, individual state budgets, etc.

9 **VIII. BENEFITS**

10 **Q. PLEASE DESCRIBE THE BENEFITS OF THE TDSIC PLAN.**

11 A. The programs in the TDSIC Plan are designed to strengthen CEI South’s electric  
12 system and prepare the system to meet customers’ future expectations and needs.  
13 Some of the main benefits of the TDSIC Plan include reduction in number and duration  
14 of unplanned outages, as well as overall improvements to system reliability and safety  
15 through the replacement of aging assets, improved deliverability, and enhanced  
16 abilities to monitor real time system performance. Additional benefits include improved  
17 system ability to serve customers even during outage events, quicker identification  
18 and isolation of customer interruptions and outages, improved accuracy with estimated  
19 restoration times and faster outage restoration; all of which add up to increased system  
20 hardening, resiliency and overall improved customer experience. A more resilient  
21 system maintains service to customers even when some system components fail. CEI  
22 South understands the importance and related savings, not only to the system but also  
23 for customers, of replacing aging, poorly performing assets before they fail. The  
24 proactive replacement of assets before failure enables the Company to plan the work  
25 rather than be reactive in an emergency. Planned work creates fewer customer  
26 disruptions and reduces after-hours work and emergency work.

27 **Q. ARE ANY OF THE BENEFITS MENTIONED EARLIER INCREMENTAL? PLEASE**  
28 **EXPLAIN.**

29 A. Yes. Each project and program completed in CEI South’s TDSIC Plan will bring  
30 customers some combination of the following incremental benefits: enhanced system  
31 reliability, resilience, deliverability, safety and modernization.



1 **Q. ARE THE ESTIMATED COSTS OF THE ELIGIBLE TRANSMISSION AND**  
2 **DISTRIBUTION SYSTEM IMPROVEMENTS INCLUDED IN THE 2024 – 2028 TDSIC**  
3 **PLAN JUSTIFIED BY INCREMENTAL BENEFITS ATTRIBUTABLE TO THE PLAN,**  
4 **AS REQUIRED UNDER SECTION 10(b)(3) OF THE TDSIC STATUTE? PLEASE**  
5 **EXPLAIN.**

6 A. Yes. This is described in Petitioner’s Witness De Stigter’s testimony. 1898 only  
7 evaluated the incremental benefits from the Plan for which a monetary value can be  
8 determined, and those monetary benefits exceed the costs of the eligible  
9 improvements in the Plan. Therefore, if we only consider the monetary incremental  
10 benefits attributable to the Plan, they justify the costs of the eligible improvements.  
11 The TDSIC Plan’s incremental benefits are directly correlated against customer needs  
12 and the risks of the aging electric system if these investments are not made. The  
13 TDSIC Plan is prudent and its incremental benefits exceed its cost, while reducing risk  
14 of the electric grid which increase overall reliability and safety to the system.

15 **Q. WHAT ABOUT INCREMENTAL BENEFITS THAT CANNOT BE MONETIZED?**

16 A. When the non-monetized incremental benefits are considered, it makes my answer to  
17 the previous question conservative. The pole replacements generate safety-related  
18 incremental benefits. The security projects harden the system against terrorist  
19 attacks. It is impossible to put a dollar value on these benefits, but they unquestionably  
20 are incremental benefits attributable to the Plan. These benefits are the reason these  
21 projects are being pursued.

22 **Q. ARE THERE ANY OTHER EXPECTED BENEFITS FROM THE 2024 – 2028 TDSIC**  
23 **PLAN?**

24 A. Yes, as Petitioner’s Witness Thibodeau describes in further detail, there are economic  
25 benefits associated with the Plan. Sargent & Lundy performed an Economic Impact  
26 Study (“EIS”) which is provided as Petitioner’s Exhibit No. 4, Attachment MRT-1 and  
27 provides an overview of the economic impacts that are attributed to the Plan.  
28 Petitioner’s Witness De Stigter also describes additional customer benefits identified  
29 in the Risk Model as the avoided costs to customers by the replacement of assets prior  
30 to failure. As further explained in detail in Witness De Stigter’s testimony, the  
31 Department of Energy has an Interruption Cost Estimate (“ICE”) calculator which was  
32 used to produce this analysis.

1 **Q. DOES THE TDSIC PLAN MEET THE PUBLIC CONVENIENCE AND NECESSITY**  
2 **REQUIRED BY TDSIC STATUTE?**

3 A. Yes. This TDSIC Plan directly enhances system reliability and resilience, public safety  
4 and employee safety and overall quality of service for CEI South customers. It ensures  
5 that CEI South’s electric infrastructure continues to perform in the safe, efficient, and  
6 reliable manner that our customers rely upon. CEI South’s existing assets and  
7 equipment have served our customers reliably and safely. But CEI South recognizes  
8 that reliability and safety are dynamic aspects of its system. These TDSIC Plan  
9 Programs and system enhancements maintain and assure future reliability, safety, and  
10 system resilience. For all these reasons, this TDSIC Plan is required for public  
11 convenience and necessity, and the Programs and associated Projects described in  
12 the TDSIC Plan must be implemented.

13 **IX. PLAN UPDATE PROCESS**

14 **Q. PLEASE DESCRIBE HOW CEI SOUTH HAS INCORPORATED PROCESS**  
15 **IMPROVEMENTS AND LESSONS LEARNED FROM ITS PRIOR TDSIC FILINGS.**

16 A. Over the course of the 44910 TDSIC Plan, CEI South has learned and implemented  
17 numerous process improvements that will be incorporated into the 2024 - 2028 TDSIC  
18 Plan. First, CEI South has a dedicated Electric Program Management team that  
19 provides oversight of the Plan in its entirety. From monitoring progress, expenditures  
20 and schedule adherence, the team collaborates with Engineering, Supply Chain,  
21 Outside Contractors, Customers, Land Services and Construction Management  
22 groups to ensure compliance with the Plan and provide recommendations or direction  
23 for changes to the Plan. Through this collaboration, many process improvements have  
24 been identified and implemented, such as,

- 25 • Change In Construction Process – designed to identify, document, and  
26 communicate changes to project scope, resources, material or other impacts  
27 that occur in the field during construction, providing a structure for decision  
28 making to maintain project schedule and budget
- 29 • Preliminary Design Reviews (PDRs) Process – designed to collaboratively  
30 review preliminary project scope with a cross-functional group to eliminate  
31 potential risks and ensure a comprehensive review of the project is performed  
32 during the engineering phase

- 1 • Cost Variance Discussion Process – designed to establish co-ownership  
2 between project estimates and project actuals to identify variance drivers and  
3 trends that can be applied to future cost estimation and projects
- 4 • Time & Equipment rates to unit rates – unit rates were established to have  
5 better cost control and drive contractor efficiencies where applicable due to  
6 complexity of work
- 7 • Increased field oversight – resources were allocated for inspection related  
8 activities providing quality control and construction efficiencies
- 9 • Bundling of project work – where applicable, projects are grouped together to  
10 minimize impact to the system and its customers, and to gain efficiencies for  
11 construction activities and costs, including reduced project mobilization costs.

12 As explained earlier in my testimony, during the TDSIC Plan development, CEI South  
13 utilized more robust updated historical data, such as cost per unit, cost per foot,  
14 material costs, labor costs and project scopes to better support the detailed cost  
15 estimates.

16 **Q. WILL THE 2024 – 2028 TDSIC PLAN REQUIRE UPDATING? PLEASE EXPLAIN.**

17 A. Yes, the TDSIC Plan will require periodic updating. As Class 4 estimates change to  
18 Class 2 estimates, there may be increased or decreased project costs that require new  
19 cost estimates to be filed. Many factors can cause significant changes in material and  
20 labor costs from month to month and year to year. In today’s global economy, market  
21 forces frequently impact major equipment suppliers and their costs. These market  
22 impacts to costs are then passed on to equipment suppliers with resulting routine  
23 changes to material price quotes. From a labor cost standpoint, unforeseen changes  
24 in site conditions can increase the project duration significantly for one project, when  
25 compared to a similar project elsewhere with ideal conditions.

26 Additionally, there may be projects that move planned construction years due to  
27 changing system or operational needs or availability of materials. Portfolio  
28 management to maximize efficiencies of the annual capital investments is achieved  
29 through these periodic updates.

1 **Q. PLEASE EXPLAIN HOW CEI SOUTH WILL UPDATE THE 2024 – 2028 TDSIC**  
2 **PLAN AS REQUIRED BY THE TDSIC STATUTE?**

3 A. CEI South proposes to update for actual costs every six months through the semi-  
4 annual tracker filings. In the semi-annual filings, CEI South will include the actual  
5 completed costs of the projects for the current filing period and any variance  
6 commentary as required. CEI South proposes to update the TDSIC Plan at least once  
7 a year through a semi-annual filing. That is, at a minimum, once per year, CEI South  
8 will include potential changes to the Plan that include new best estimate of costs as  
9 well as information related to projects that are moving between plan years, or projects  
10 that are moving in or out of the Plan. As discussed earlier in my testimony, the  
11 Company performs detailed engineering in advance and therefore the Company  
12 proposes to adjust project estimates once per year in one of the semi-annual filings.

13 **Q. PLEASE DISCUSS WHETHER CEI SOUTH IS PROPOSING ANY CHANGES TO**  
14 **WHAT IS CURRENTLY PROVIDED IN ITS UPDATES TO THE 44910 TDSIC PLAN.**

15 A. CEI South is not proposing any changes to what is currently provided in its updates to  
16 the 44910 TDSIC Plan.

17 **X. EXECUTION OF 2024 – 2028 TDSIC PLAN**

18 **Q. PLEASE DESCRIBE CEI SOUTH’S PROCESS FOR EXECUTING AND MANAGING**  
19 **THE PROJECTS INCLUDED IN THE 2024 – 2028 TDSIC PLAN.**

20 A. CEI South has many robust processes in place to provide program, project, and  
21 construction management of the TDSIC Plan. CEI South’s Electric Program  
22 Management team provides oversight of the Plan in its entirety through a dedicated  
23 Program Manager, Project Managers as well as analysts to monitor progress,  
24 expenditures, and schedule adherence from project design through the completion of  
25 construction. The Project Managers collaborate with CEI South’s Engineering, Supply  
26 Chain, Outside Contractors, Customers, Land Services, and the Construction  
27 Management groups. This collaboration is to ensure compliance with the Plan and  
28 provide recommendations or direction for changes to the Plan.

29 Detailed engineering is typically performed a year in advance of the planned  
30 construction date to produce a Class 2 estimate. Costs for labor and material are  
31 refined, many based on competitive bids. These factors help reduce the risks and may

1 increase or decrease the total estimated cost of the projects, which may in turn change  
2 the Plan portfolio of projects. Increased project estimates may reduce the overall  
3 number of projects executed in the planned year while decreased estimates can result  
4 in additional projects being prioritized into the planned year.

5 **Q. PLEASE EXPLAIN HOW CEI SOUTH HAS ADDRESSED RISKS ASSOCIATED**  
6 **WITH THE EXECUTION OF THE 2024 – 2028 TDSIC PLAN.**

7 A. CEI South aims to submit accurate and complete estimates but knows that there is  
8 inherent cost risk to all projects. All cost risks cannot ever be fully known during the  
9 time of estimate creation. Nor can the future cost of labor and material be known at  
10 that time. Therefore, the use of contingency and escalation on the summary work  
11 paper is required to be part of the total cost of the project to submit the best estimate.  
12 The inclusion of contingency and escalation is for addressing project uncertainties.

13 **XI. STATUTORY COMPLIANCE**

14 **Q. IND. CODE § 8-1-39-9(E) REQUIRES “[A] PUBLIC UTILITY THAT IMPLEMENTS A**  
15 **TDSIC UNDER [THE TDSIC STATUTE] SHALL, BEFORE THE EXPIRATION OF**  
16 **THE PUBLIC UTILITY’S APPROVED TDSIC PLAN, PETITION THE COMMISSION**  
17 **FOR REVIEW AND APPROVAL OF THE PUBLIC UTILITY’S BASIC RATES AND**  
18 **CHARGES WITH RESPECT TO THE SAME TYPE OF UTILITY SERVICE.”**  
19 **PLEASE EXPLAIN HOW CEI SOUTH INTENDS TO COMPLY WITH THIS**  
20 **REQUIREMENT.**

21 A. The 44910 TDSIC Plan is set to expire on December 31, 2023. CEI South will petition  
22 the Commission for review and approval of its basic rates and charges for electric  
23 utility service before December 31, 2023, to satisfy the requirements set forth in the  
24 TDSIC Statute with respect to the 44910 TDSIC Plan. CEI South will file another  
25 general rate case before the expiration of the plan proposed in this case.

26 **Q. ARE ALL OF THE PROJECTS INCLUDED IN CEI SOUTH’S 2024 – 2028 TDSIC**  
27 **PLAN UNDERTAKEN FOR PURPOSES OF SAFETY, RELIABILITY, GRID**  
28 **MODERNIZATION, OR ECONOMIC DEVELOPMENT?**

29 A. Yes.

1 Q. ARE ANY OF THE PROJECTS INCLUDED IN THE 2024 – 2028 TDSIC PLAN  
2 INCLUDED IN CEI SOUTH’S CURRENT BASE RATES?

3 A. No.

4 Q. HAS CEI SOUTH APPLIED TO RECEIVE GRANT FUNDING THROUGH THE 2021  
5 FEDERAL INFRASTRUCTURE INVESTMENT AND JOBS ACT (IIJA)?

6 A. The Indiana Office of Energy Development (“OED”) is applying for Topic Area 3 of the  
7 U.S. Department of Energy’s (“DOE”) Funding Opportunity Announcement for Grid  
8 Resilience & Innovation Partnerships (DE-FOA-0002740) in partnership with Indiana  
9 utilities. As a utility partner in this effort, CEI South is a potential subrecipient of this  
10 grant funding if the OED is successful in its grant application to the DOE. It is  
11 anticipated that the DOE will announce the successful grant applicants in the later part  
12 of 2023. The proposed projects CEI South has submitted to the OED would be  
13 completed outside of the 2024 – 2028 TDSIC Plan.

14 Q. DOES THE PUBLIC CONVENIENCE AND NECESSITY REQUIRE OR WILL IT  
15 REQUIRE THE ELIGIBLE IMPROVEMENTS INCLUDED IN THE 2024-2028 TDSIC  
16 PLAN?

17 A. Yes. The eligible improvements included in the 2024 – 2028 TDSIC Plan are required  
18 or will be required to maintain the safety, integrity, and reliability of CEI South’s  
19 transmission and distribution systems consistent with the public convenience and  
20 necessity, as discussed above.

21 Q. IS CEI SOUTH’S 2024-2028 TDSIC PLAN REASONABLE?

22 A. Yes. As demonstrated by the evidence provided in CEI South’s case-in-chief, the 2024  
23 – 2028 TDSIC Plan is reasonable and should be approved by the Commission.

24 XII. CONCLUSION

25 Q. DOES THIS CONCLUDE YOUR PREPARED DIRECT TESTIMONY?

26 A. Yes.

**VERIFICATION**

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

SOUTHERN INDIANA GAS AND ELECTRIC  
COMPANY D/B/A CENTERPOINT ENERGY  
INDIANA SOUTH

*Stephen R. Rawlinson*

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Stephen R. Rawlinson  
Director, Electric Engineering

*5-24-2023*

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Date

## CEI South - Electric TDSIC Plan Projects

SAP No.	T or D Asset	ABM	OC	City	TDSIC Program	SAP Description	Current Planned Year	Original Capital Estimate
103148772	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Heritage Ckt (MP#1) Ph 3	2024	
103148775	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Victoria Ckt (MP #2)	2024	
103148777	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Heritage Ckt Ph 1 (MP #3)	2024	
103148782	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Friedman Park Ckt #1 (MP #4)	2024	
103148992	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Friedman Park Ckt #1 (MP #5)	2024	
103842570	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Pelzer Ckt Ph 1	2024	
103842571	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Pelzer Ckt Ph 2	2024	
103842572	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Pelzer Ckt Ph 3	2024	
103842574	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Baseline Ckt Ph 4	2024	
104645855	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Baseline Ckt Ph 1	2024	
104847711	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Baseline Ckt Ph 2	2024	
104848003	Distribution Asset	Distribution	Rockport	Dale	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Dale South Ckt Ph 1	2024	
104848745	Distribution Asset	Distribution	Boonville	Folsomville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Folsomville Ckt Ph 3	2024	
104848910	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Heritage Ckt Ph 2	2024	
104849238	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Jenner Ckt Ph 1	2024	
104849631	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Lincoln Ckt Ph 1	2024	
104849830	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Lincoln Ckt Ph 2	2024	
104850359	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_North Park Ckt Ph 2	2024	
104854709	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Tennysen Ckt Ph 1	2024	
104854712	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl-Theater Drive Ckt Ph 1	2024	
105250293	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Andrews Ckt-Capacitor	2024	
105250295	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Azteca Milling Ckt-Capacitor	2024	
105251045	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Ellenwood 2 Ckt Ph 2	2024	
105256517	Distribution Asset	Distribution	Francisco	Princeton	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Heston Ckt Ph 1	2024	
106081556	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Adams Ckt-Capacitor	2024	
106083512	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Governor Ckt-Capacitor	2024	
106083517	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Cross Pointe Ckt-Capacitor	2024	
106493649	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Bergdolt Ckt #3	2024	
106923670	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Maryland Ckt #3	2024	
106264723	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Distribution Automation	E560-2 Elec Dist_DA_Caborn Ckt	2024	
106264728	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2 Elec Dist_DA_Highway 57 Ckt	2024	
106265111	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2 Elec Dist_DA_Stevenson Station Ckt	2024	
106265112	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Distribution Automation	E560-2 Elec Dist_DA_Wabash Ckt	2024	
106265601	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2 Elec Dist_DA_Pollack Avenue Ck	2024	
106291607	Distribution Asset	Distribution	Boonville	Boonville	Distribution Automation	E560-2 Elec Dist_DA_Pelzer Ckt	2024	
107371720	Sub-Transmission Asset	Substation	Evansville	Yankeetown	Physical Security		2024	
107372009	Sub-Transmission Asset	Substation	Evansville	Evansville	Physical Security		2024	
107372019	Sub-Transmission Asset	Substation	Evansville	Evansville	Physical Security		2024	
107372028	Sub-Transmission Asset	Substation	Evansville	Evansville	Physical Security		2024	
Varies	Sub-Distribution Asset	Substation	Evansville	Evansville	Physical Security	E560-2 Elec Substa_Physical Security_Surveillance Systems 2024	2024	
105463615	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2 Elec Substa_Substa Rebuild_Bergdolt Expansion	2024	
105463617	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2 Elec Substa_Substa Rebuild_Fairlawn	2024	
105463618	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2 Elec Substa_Substa Rebuild_Garvin Expansion	2024	
105463620	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2 Elec Substa_Substa Rebuild_Maryland Expansion	2024	
105463622	Sub-Distribution Asset	Substation	Evansville	Mount Vernon	Substation Rebuild	E560-2 Elec Substa_Substa Rebuild_Point	2024	
105464672	Sub-Transmission Asset	Substation	Evansville	Lynnville	Substation Rebuild	E560-2 Elec Substa_Substa Rebuild_Lynnville	2024	
105464678	Sub-Distribution Asset	Substation	Evansville	Mount Vernon	Substation Rebuild	E560-2 Elec Substa_Substa Rebuild_Saint Phillips	2024	
102794426	Transmission Asset	Transmission	Evansville	Darmstadt	Transmission Line Rebuild	E560-2 Elec Tran_Line Rebuild_Y74 MARTIN RD TO AZTECA REBUILD (OPGW)	2024	
105221617	Transmission Asset	Transmission	Evansville	Winslow	Transmission Line Rebuild	E560-2 Elec Tran_Line Rebuild_Y39 CATO TO WINSLOW REBUILD (OPGW)	2024	
105221618	Transmission Asset	Transmission	Evansville	Oakland City	Transmission Line Rebuild	E560-2 Elec Tran_Line Rebuild_Y52-3 OAKLAND CITY TO DUKE OAKLAND CITY REBUILD	2024	
105221621	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2 Elec Tran_Line Rebuild_Y74-1/Y54 NE TO HWY 41 REBUILD (OPGW)	2024	
98775896	Distribution Asset	Distribution	Rockport	Lincoln City	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Lincoln State Park	2024	
104645001	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_University Shopping Center Cable Replacement	2024	
104650014	Distribution Asset	Distribution	Rockport	Dale	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Dale South URD Replacement	2024	
104847714	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Oak Meadow Sub	2024	
104847880	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Burkhardt Ckt Exit Replacement	2024	
104847991	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Normandy Arms Cable Replacement	2024	
104847995	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Cullen Avenue Cable Replacement	2024	
104849338	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Washington Square Mall Cable Replacement	2024	
104849342	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Horizon Homes Cable Replacement	2024	
104850176	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Christmas Lake Village Ph 2	2024	
105251189	Distribution Asset	Distribution	Francisco	Fort Branch	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Fort Branch Ckt Ph 1	2024	
105251462	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2 Elec Dist_UG Rebl_Mulberry Ckt 1 N-10	2024	
Varies	Distribution Asset	Distribution	Varies	Varies	Wood Pole Replacement	E560-2 Elec Dist_12kV Circuit Rebl_Wood Pole Replacement 2024	2024	
104847723	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Burkhardt Ckt Ph 1	2025	
104848005	Distribution Asset	Distribution	Rockport	Dale	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Dale South Ckt Ph 2	2025	
104848268	Distribution Asset	Distribution	Rockport	Dale	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Dale South Ckt Ph 3	2025	
104849061	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Hornville Ckt Ph 1	2025	
104849831	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Lincoln Ckt Ph 3	2025	
105250298	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Highway 662 Ckt-Capacitor	2025	
105250299	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Kasson Ckt Ph 2	2025	
105250304	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Concord Boulevard Ckt Ph 1	2025	
105251030	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Culverson Ckt Ph 1	2025	
105251031	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Culverson Avenue Ckt Ph 2	2025	
105251037	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Darmstadt Ckt Ph 2	2025	
105251041	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Darmstadt Ckt Ph 1	2025	
105251044	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Ellenwood 2 Ckt Ph 1	2025	
105251198	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Hatfield Ckt Ph 1	2025	
105251199	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Highway 662 and Frame Road Ckt Tie	2025	
105251205	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2 Elec Dist_12kV Circuit Rebl_Kimball Ckt Ph 1	2025	



## CEI South - Electric TDSIC Plan Projects

SAP No.	T or D Asset	ABM	OC	City	TDSIC Program	SAP Description	Current Planned Year	Original Capital Estimate
105251206	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Kimball Ckt Ph 2	2025	
105251208	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lafayette Ckt Ph 2	2025	
105251450	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lafayette Ckt Ph 3	2025	
105251451	Distribution Asset	Distribution	Rockport	Santa Claus	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lincoln Ckt Ph 1	2025	
105251461	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Midtown Park Ckt Ph 1	2025	
105253735	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Highland Ckt Ph 1	2025	
105253738	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Ellenwood 2 Ckt Ph 3	2025	
105253741	Distribution Asset	Distribution	Mount Vernon	New Harmony	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_New Harmony West Ckt Ph 1	2025	
105254087	Distribution Asset	Distribution	Mount Vernon	New Harmony	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_New Harmony West Ckt Ph 3	2025	
105254630	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Thompson Avenue Ckt Ph 1	2025	
105254632	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Thompson Avenue Ckt Ph 2	2025	
105254635	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Mount Auburn Ckt Ph 1	2025	
105782451	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Greencove Ckt Ph 3	2025	
106081552	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lockwood Ckt-Capacitor	2025	
106081553	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Highway 41 Ckt-Capacitor	2025	
106081554	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Green Springs Ckt-Capacitor	2025	
106081555	Distribution Asset	Distribution	Boonville	Newburgh	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Bell Oaks Ckt-Capacitor	2025	
106265114	Distribution Asset	Distribution	Francisco	Stendal	Distribution Automation	E560-2_Elec Dist_DA_Arthur Ckt	2025	
106265118	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Epworth Ckt	2025	
106265491	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Distribution Automation	E560-2_Elec Dist_DA_Farmersville Ckt	2025	
106265505	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Greencove Ckt	2025	
106265508	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Distribution Automation	E560-2_Elec Dist_DA_Rush Creek Ckt	2025	
106292629	Distribution Asset	Distribution	Boonville	Newburgh	Distribution Automation	E560-2_Elec Dist_DA_Newburgh Ckt	2025	
107372020	Sub-Transmission Asset	Substation	Evansville	Evansville	Physical Security		2025	
107372390	Sub-Transmission Asset	Substation	Evansville	Evansville	Physical Security		2025	
107372393	Sub-Transmission Asset	Substation	Evansville	Evansville	Physical Security		2025	
107372402	Sub-Transmission Asset	Substation	Evansville	Evansville	Physical Security		2025	
Varies	Sub-Distribution Asset	Substation	Evansville	Evansville	Physical Security	E560-2_Elec Substa_Physical Security_Surveillance Systems 2025	2025	
105463621	Sub-Distribution Asset	Substation	Evansville	New Harmony	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_New Harmony	2025	
105463623	Sub-Distribution Asset	Substation	Evansville	Newburgh	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Yankeetown	2025	
105463626	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_County Line	2025	
105463627	Sub-Distribution Asset	Substation	Evansville	Mount Vernon	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Givens	2025	
105464112	Sub-Transmission Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Northwest	2025	
105461593	Transmission Asset	Transmission	Evansville	Oakland City	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y52-2 MACKEY TO OAKLAND CITY REBUILD	2025	
105461603	Transmission Asset	Transmission	Evansville	Jasper	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y67/Z78 JUNCTION TO JASPER SOUTH REBUILD (OPGW)	2025	
105461936	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_299 AB BROWN TO WOLF ROAD REBUILD (OPGW)	2025	
104849343	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Bryce De Moray Cable Repl	2025	
104852142	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Christmas Lake Village Ph 5	2025	
104852144	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Christmas Lake Village Ph 6	2025	
105250301	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Theater Drive and Old Boonville Hwy Ckt Exit	2025	
105250307	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Southwind Apartments	2025	
105250308	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Green Valley Apartments	2025	
105251033	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Culverson Avenue Ckt Exit	2025	
105251190	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Hickory Lane	2025	
105251193	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Robin Hill	2025	
105251196	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Brosend Road	2025	
105251200	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Orchard Road	2025	
105251452	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Timber Lakeside Manor Apts	2025	
105251459	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Meadow Court	2025	
105251460	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_McDowell Ckt Exit	2025	
105251465	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Mulberry Ckt 1 N-12	2025	
105252925	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Apple Road	2025	
105253353	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Bridgestone	2025	
105253355	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Kirkwood Drive	2025	
105253357	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Foxfire	2025	
105253732	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Devonshire 1	2025	
Varies	Distribution Asset	Distribution	Varies	Varies	Wood Pole Replacement	E560-2_Elec Dist_12kV Circuit Reblld_Wood Pole Replacement 2025	2025	
105250296	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_John Street Ckt-Capacitor	2026	
105251039	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Darmstadt Ckt Ph 4	2026	
105251042	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Edson Ckt Ph 1	2026	
105251204	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_John Street Ckt Ph 1	2026	
105254645	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Culverson Ckt Ph 3	2026	
105758606	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Stevenson Station Ckt Ph 1	2026	
105758607	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Greencove Ckt Ph 1	2026	
105758608	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Seventh Avenue Ckt Ph 1	2026	
105758849	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Villa Ckt Ph 1	2026	
105758850	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lincoln Ckt Ph 5	2026	
105758851	Distribution Asset	Distribution	Mount Vernon	New Harmony	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_New Harmony East Ckt Ph 1	2026	
105758855	Distribution Asset	Distribution	Rockport	Dale	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Locust Ckt Ph 1	2026	
105776704	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Monroe Ckt Ph 1	2026	
105782291	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Washington Square and Lawndale Ckts	2026	
105782294	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Eastland Mall Ckt Ph 1	2026	
105782296	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Marrs Ckt Ph 1	2026	
105782299	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lawndale Ckt Ph 1	2026	
105782397	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lawndale Ckt Ph 2	2026	
105782400	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Yokel Ckt Ph 1	2026	
105782405	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Marrs Ckt Ph 2	2026	
105782407	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Burdette Ckt Ph 2	2026	
106083061	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Bergdolt Ckt-Capacitor	2026	
106083062	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_City Ckt-Capacitor	2026	
106083064	Distribution Asset	Distribution	Rockport	Dale	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Dale Industrial Ckt-Capacitor	2026	

CEI South - Electric TDSIC Plan Projects

SAP No.	T or D Asset	ABM	OC	City	TDSIC Program	SAP Description	Current Planned Year	Original Capital Estimate
106083068	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Midtown Park Ckt-Capacitor	2026	
106348498	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Untiontown Ckt Ph 1	2026	
106266199	Distribution Asset	Distribution	Boonville	Chandler	Distribution Automation	E560-2_Elec Dist_DA_Chandler Ckt	2026	
106266200	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Blairsville Ckt	2026	
106266201	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Darmstadt Ckt	2026	
106266205	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_North Park Ckt	2026	
106266206	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Distribution Automation	E560-2_Elec Dist_DA_Springfield Ckt	2026	
106266207	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Highland Ckt	2026	
106266493	Distribution Asset	Distribution	Boonville	Newburgh	Distribution Automation	E560-2_Elec Dist_DA_Green Springs Ckt	2026	
106266503	Distribution Asset	Distribution	Boonville	Newburgh	Distribution Automation	E560-2_Elec Dist_DA_High Pointe Ckt	2026	
Varies	Sub-Distribution Asset	Substation	Evansville	Evansville	Physical Security	E560-2_Elec Substa_Physical Security_Surveillance Systems 2026	2026	
105464122	Sub-Transmission Asset	Substation	Evansville	Winslow	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Winslow	2026	
105464449	Sub-Transmission Asset	Substation	Evansville	Troy	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Netwonville	2026	
105464451	Sub-Distribution Asset	Substation	Evansville	Santa Claus	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Santa Claus	2026	
105461608	Transmission Asset	Transmission	Evansville	Tennyson	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_284-1 CULLEY TO TENNYSON REBUILD (OPGW)	2026	
105251464	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Mulberry Ckt 1 N-4	2026	
105777607	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Indian Wood Apartments	2026	
105778133	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Valley Downs	2026	
105778145	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Vann Avenue Apartments	2026	
105778556	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Poplar Drive	2026	
105778559	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Lynn Road	2026	
105779551	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Boyle Lane	2026	
105779556	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Hilldale Drive	2026	
105779560	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Morgan Center	2026	
105779562	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Locust Square	2026	
105779938	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Metro Centre East	2026	
105779948	Distribution Asset	Distribution	Boonville	Boonville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Lost Lake	2026	
106173964	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Outer Grey Street URD	2026	
106173967	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Enterprise Ckt Ph 1 URD	2026	
Varies	Distribution Asset	Distribution	Varies	Varies	Wood Pole Replacement	E560-2_Elec Dist_12kV Circuit Reblld_Wood Pole Replacement 2026	2026	
105250297	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Seventh Avenue Ckt-Capacitor	2027	
105250300	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Harmony Way Ckt Ph 1	2027	
105251043	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Eleventh Avenue Ckt Ph 3	2027	
105253736	Distribution Asset	Distribution	Rockport	Chrisney	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Chrisney North Ckt Ph 1	2027	
105782393	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Burdette Ckt Ph 1	2027	
105782455	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_South Boeke Ckt Ph 3	2027	
106083510	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Clover Ckt-Capacitor	2027	
106083514	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lafayette Ckt-Capacitor	2027	
106083515	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Lodge Avenue Ckt-Capacitor	2027	
106083516	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Pollack Avenue Ckt-Capacitor	2027	
106171418	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Wabash Ckt Ph 1	2027	
106171936	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Fillman Ckt Ph 1	2027	
106171939	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Hospital Ckt Ph 1	2027	
106171944	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Fillman Ckt Ph 2	2027	
106172069	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Harmony Way Ckt Ph 2	2027	
106172081	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_West Columbia Ckt Ph 1	2027	
106172088	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Wabash Ckt Ph 2	2027	
106173101	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_McDowell Ckt Ph 1	2027	
106173529	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_City Ckt Ph 1	2027	
106173530	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Rose Hill Ckt Ph 5	2027	
106173531	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Hospital Ckt Ph 2	2027	
106173533	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_West Columbia Ckt Ph 3	2027	
106173535	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Hospital Ckt Ph 3	2027	
106173540	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Harmony Way Ckt Ph 4	2027	
106348499	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Klietz Ckt Ph 1	2027	
106348500	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblld_Klietz Ckt Ph 2	2027	
106266202	Distribution Asset	Distribution	Boonville	Boonville	Distribution Automation	E560-2_Elec Dist_DA_Fillman Ckt	2027	
106266492	Distribution Asset	Distribution	Francisco	Fort Branch	Distribution Automation	E560-2_Elec Dist_DA_Douglas Station Ckt	2027	
106266495	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Lafayette Ckt	2027	
106266497	Distribution Asset	Distribution	Boonville	Boonville	Distribution Automation	E560-2_Elec Dist_DA_Lenn Road Ckt	2027	
106266499	Distribution Asset	Distribution	Mount Vernon	New Harmony	Distribution Automation	E560-2_Elec Dist_DA_New Harmony West Ckt	2027	
106266502	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_fifth Avenue Ckt	2027	
106266506	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_John Street Ckt	2027	
106266507	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Sixth Street Ckt	2027	
106291604	Distribution Asset	Distribution	Rockport	Santa Claus	Distribution Automation	E560-2_Elec Dist_DA_Santa Claus Ckt	2027	
107192097	Distribution Asset	Distribution	Francisco	Fort Branch	Distribution Automation	E560-2_Elec Dist_DA_Fort Branch Ckt	2027	
Varies	Sub-Distribution Asset	Substation	Evansville	Evansville	Physical Security	E560-2_Elec Substa_Physical Security_Surveillance Systems 2027	2027	
105464111	Sub-Distribution Asset	Substation	Evansville	Newburgh	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Newburgh	2027	
105464115	Sub-Distribution Asset	Substation	Evansville	Rockport	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Rockport	2027	
105464117	Sub-Transmission Asset	Substation	Evansville	Saint Henry	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Saint Henry	2027	
105464125	Sub-Distribution Asset	Substation	Evansville	Boonville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Boonville	2027	
105464127	Sub-Transmission Asset	Substation	Evansville	Daylight	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Elliott Transmission	2027	
105464454	Sub-Transmission Asset	Substation	Evansville	Newburgh	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Culley 138KV	2027	
105461933	Transmission Asset	Transmission	Evansville	Tennyson	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_284-1 TENNYSON TO DUBOIS REBUILD (OPGW)	2027	
105251029	Distribution Asset	Distribution	Rockport	Chrisney	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Chrisney South Ckt Ph 1	2027	
105251463	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Mulberry Ckt 2 N-5	2027	
105253734	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Yokel Road	2027	
106173543	Distribution Asset	Distribution	Boonville	Chandler	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Chandler Ckt Ph 1	2027	
106173544	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Clover Ckt Ph 1	2027	
106173545	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Concord Boulevard Ckt Ph 1 URD	2027	
106173546	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Dam Ckt Ph 1	2027	
106173968	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Lockwood Ckt Ph 1 URD	2027	
106175549	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Parklawn Ckt Exit	2027	
106175550	Distribution Asset	Distribution	Boonville	Boonville	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Fillman Ckt Ph 1	2027	
106175558	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblld_Lenn Road Ckt Ph 4	2027	

## CEI South - Electric TDSIC Plan Projects

SAP No.	T or D Asset	ABM	OC	City	TDSIC Program	SAP Description	Current Planned Year	Original Capital Estimate
106175563	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_North Boeke Road Ckt Ph 1 URD	2027	
106175564	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_North Boeke Ckt Ph 2 URD	2027	
106175565	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Old Boonville Ckt Ph 1	2027	
106351159	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Blue Lake Estates	2027	
106351165	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Hebron Avenue	2027	
106351970	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Christmas Lake Village Ph 9	2027	
Varies	Distribution Asset	Distribution	Varies	Varies	Wood Pole Replacement	E560-2_Elec Dist_12kV Circuit Reblnd_Wood Pole Replacement 2027	2027	
104461117	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Farmersville Ckt Ph 2	2028	
105251192	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Green River Road Ckt Ph 1	2028	
105254648	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_South Boeke Ckt Ph 1	2028	
105782308	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Villa Drive Ckt Ph 2	2028	
106081550	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_West Columbia Ckt-Capacitor	2028	
106081551	Distribution Asset	Distribution	Rockport	Santa Claus	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Santa Claus Ckt-Capacitor	2028	
106083065	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Eastland Mall Ckt-Capacitor	2028	
106083518	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Venetian Ckt-Capacitor	2028	
106083519	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Wortman Road Ckt-Capacitor	2028	
106083520	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Farmersville Ckt-Capacitor	2028	
106173108	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Copperline Road Ckt Ph 1	2028	
106347986	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Marx Road Ckt Ph 1	2028	
106347987	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Marx Road Ckt Ph 2	2028	
106348496	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Farmersville Ckt Ph 3	2028	
106348497	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Hoosier Avenue Ckt Ph 1	2028	
106348501	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Marx Road Ckt Ph 4	2028	
106348505	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_McCool Ckt Ph 2	2028	
106348508	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Mount Auburn Ckt Ph 2	2028	
106349249	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Browning Road Ckt Ph 1	2028	
106349251	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Concord Boulevard Ckt Ph 2	2028	
106349252	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Concord Boulevard Ckt Ph 3	2028	
106349253	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Concord Boulevard Ckt Ph 4	2028	
106349254	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Concord Boulevard Ckt Ph 5	2028	
106349256	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Copperline Road Ckt Ph 2	2028	
106350491	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Pollack Avenue Ckt Ph 1	2028	
106350492	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Red Bank Ckt Ph 1	2028	
106350496	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Vogel Road Ckt Ph 1	2028	
106350497	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Vogel Road Ckt Ph 2	2028	
106350498	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Vogel Road Ckt Ph 3	2028	
106350499	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Wortman Rd Ckt Ph 1	2028	
106264726	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Distribution Automation	E560-2_Elec Dist_DA_Edson Ckt	2028	
106266690	Distribution Asset	Distribution	Boonville	Newburgh	Distribution Automation	E560-2_Elec Dist_DA_Dam Ckt	2028	
106266692	Distribution Asset	Distribution	Rockport	Dale	Distribution Automation	E560-2_Elec Dist_DA_Dale North Ckt	2028	
106266693	Distribution Asset	Distribution	Rockport	Dale	Distribution Automation	E560-2_Elec Dist_DA_Dale South Ckt	2028	
106266695	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Harmony Way Ckt	2028	
106266696	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Hedden Road Ckt	2028	
106266698	Distribution Asset	Distribution	Rockport	Holland	Distribution Automation	E560-2_Elec Dist_DA_Holland Ckt	2028	
106266699	Distribution Asset	Distribution	Rockport	Santa Claus	Distribution Automation	E560-2_Elec Dist_DA_Lincoln City Ckt	2028	
106266700	Distribution Asset	Distribution	Boonville	Boonville	Distribution Automation	E560-2_Elec Dist_DA_Bowling Alley Ckt	2028	
106266702	Distribution Asset	Distribution	Boonville	Boonville	Distribution Automation	E560-2_Elec Dist_DA_Hospital Ckt	2028	
106291603	Distribution Asset	Distribution	Rockport	Stendal	Distribution Automation	E560-2_Elec Dist_DA_Stendal Ckt	2028	
107187737	Distribution Asset	Distribution	Rockport	Princeton	Distribution Automation	E560-2_Elec Dist_DA_Heston Ckt	2028	
107192096	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_North Central Ckt	2028	
Varies	Sub-Distribution Asset	Substation	Evansville	Evansville	Physical Security	E560-2_Elec Substa_Physical Security_Surveillance Systems 2028	2028	
105439114	Sub-Transmission Asset	Substation	Evansville	Mount Vernon	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Mount Vernon	2028	
105464674	Sub-Transmission Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Northeast	2028	
105461938	Transmission Asset	Transmission	Evansville	Petersburg	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z84-3 CATO TO PETERSBURGH REBUILD	2028	
105461942	Transmission Asset	Transmission	Evansville	Duff	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z84-3 DUFF TO CATO REBUILD (OPGW)	2028	
104847989	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Lant Manor Cable Replacement	2028	
105251034	Distribution Asset	Distribution	Rockport	Dale	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Dale Industrial Ckt Exit	2028	
105251035	Distribution Asset	Distribution	Rockport	Dale	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Locust Ckt Exit	2028	
105251036	Distribution Asset	Distribution	Rockport	Dale	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Dale South Ckt Exit	2028	
105252921	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Mulberry Ckt 3 N-11	2028	
106173966	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Dam Ckt Ph 2 URD	2028	
106350500	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Armstrong Ckt Ph 1	2028	
106350506	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Baseline Ckt Ph 3	2028	
106350507	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Browning Ckt Ph 1	2028	
106351152	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Highway 57 Ckt Ph 1	2028	
106351153	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Christmas Lake Village Ph 7	2028	
106351156	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Meadowcrest Court	2028	
106351160	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Tibarand Road	2028	
106351163	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Barter Road	2028	
106351164	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Green River Road Ckt Ph 1	2028	
106351166	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Heden Road	2028	
106351167	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblnd_Country Place Estates	2028	
Varies	Distribution Asset	Distribution	Varies	Varies	Wood Pole Replacement	E560-2_Elec Dist_12kV Circuit Reblnd_Wood Pole Replacement 2028	2028	
104848371	Distribution Asset	Distribution	Rockport	Gentryville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Dale South Ckt Ph 4	PSP	
104848739	Distribution Asset	Distribution	Boonville	Folsomville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Folsomville Ckt Ph 1	PSP	
104848744	Distribution Asset	Distribution	Boonville	Folsomville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Folsomville Ckt Ph 2	PSP	
104848923	Distribution Asset	Distribution	Boonville	Folsomville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Folsomville Ckt Ph 4	PSP	
104849051	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Highway 57 Ckt Ph 1	PSP	
104849241	Distribution Asset	Distribution	Boonville	Chandler	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Jenner Ckt Ph 2	PSP	
104849835	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_Lincoln Ckt Ph 4	PSP	
104850224	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit Reblnd_North Park Ckt Ph 1	PSP	

## CEI South - Electric TDSIC Plan Projects

SAP No.	T or D Asset	ABM	OC	City	TDSIC Program	SAP Description	Current Planned Year	Original Capital Estimate
104852145	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Scales Lake Ckt Ph 1	PSP	
104852148	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Shelton Road Ckt Ph 2	PSP	
104854710	Distribution Asset	Distribution	Rockport	Tennyson	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Tennyson Ckt Ph 2	PSP	
105250302	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Theater Drive Ckt Ph 2	PSP	
105251038	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Darmstadt Ckt Ph 3	PSP	
105251191	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Governor Ckt Ph 1	PSP	
105252927	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_North Central Ckt Ph 1	PSP	
105253360	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rosenberger Ckt Ph 1	PSP	
105253745	Distribution Asset	Distribution	Mount Vernon	New Harmony	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_New Harmony West Ckt Ph 2	PSP	
105254634	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Highway 41 Ckt Ph 1	PSP	
105254636	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rotherwood Avenue Ckt Ph 1	PSP	
105254642	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Barker Avenue Ckt Ph 1	PSP	
105256514	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Warrenton Ckt Ph 1	PSP	
105758603	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Ellenwood 2 Ckt Ph 4	PSP	
105758604	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Blairville Ckt Ph 1	PSP	
105758852	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Stockwell Ckt Ph 1	PSP	
105758854	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_North Boeke Ckt Ph 1	PSP	
105777595	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Hogge Road Ckt Ph 1	PSP	
105782302	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Pelzer Ckt Ph 5	PSP	
105782305	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Kasson Ckt Ph 3	PSP	
105782391	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_South Boeke Ph 2	PSP	
105782395	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Mount Vernon Industrial Ckt Ph 1	PSP	
105782398	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Kratzville Ckt Ph 1	PSP	
105782406	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Greencove Ckt Ph 2	PSP	
106083067	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Levee Pump Ckt-Capacitor	PSP	
106171305	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Marrs Ckt Ph 3	PSP	
106171423	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rose Hill Ckt Ph 1	PSP	
106171947	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rose Hill Ckt Ph 2	PSP	
106172077	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rose Hill Ckt Ph 3	PSP	
106173105	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rose Hill Ckt Ph 4	PSP	
106173106	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Kratzville Ckt Ph 2	PSP	
106173537	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rose Hill Ckt Ph 6	PSP	
106173541	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Harmony Way Ckt Ph 5	PSP	
106173542	Distribution Asset	Distribution	Rockport	Rockport	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Rose Hill Ckt Ph 7	PSP	
106348504	Distribution Asset	Distribution	Boonville	Boonville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_McCool Ckt Ph 1	PSP	
106349255	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Concord Boulevard Ckt Ph 6	PSP	
106349257	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Farmersville Ckt Ph 1	PSP	
106350493	Distribution Asset	Distribution	Rockport	Grandview	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Vance Lake Ckt Ph 1	PSP	
106350494	Distribution Asset	Distribution	Rockport	Grandview	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Vance Lake Ckt Ph 2	PSP	
106351972	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Adams Ckt Ph 1	PSP	
106351973	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Andrews Ckt Ph 1	PSP	
106433459	Distribution Asset	Distribution	Rockport	Tennyson	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Tennyson Ckt Ph 3	PSP	
106475463	Distribution Asset	Distribution	Evansville	Evansville	12kV Circuit Rebuild	E560-2_Elec Dist_12kV Circuit ReblD_Kasson Ckt Ph 4	PSP	
106266203	Distribution Asset	Distribution	Evansville	Evansville	Distribution Automation	E560-2_Elec Dist_DA_Lodge Ckt	PSP	
106266489	Distribution Asset	Distribution	Boonville	Chandler	Distribution Automation	E560-2_Elec Dist_DA_McCool Ckt	PSP	
105463613	Sub-Distribution Asset	Substation	Evansville	New Harmony	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Benton Corner	PSP	
105463625	Sub-Distribution Asset	Substation	Evansville	Chrisney	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Chrisney	PSP	
105463628	Sub-Transmission Asset	Substation	Evansville	Grandview	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Grandview	PSP	
105464120	Sub-Distribution Asset	Substation	Evansville	Saint Meinrad	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Saint Meinrad	PSP	
105464121	Sub-Distribution Asset	Substation	Evansville	Boonville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Vigo Coal	PSP	
105464460	Sub-Transmission Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Heidelbach	PSP	
105464463	Sub-Distribution Asset	Substation	Evansville	Midway	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Midway	PSP	
105464465	Sub-Transmission Asset	Substation	Evansville	Mount Vernon	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_AB Brown 138kV	PSP	
105464669	Sub-Transmission Asset	Substation	Evansville	Newburgh	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Culley 69kV	PSP	
105464676	Sub-Transmission Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_PPG	PSP	
105464684	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Fuquay	PSP	
105464809	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Hirsch Road	PSP	
105464810	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Louis Allis	PSP	
105464813	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Mead Johnson Park	PSP	
105464816	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Expansion_Mulberry Expansion	PSP	
105464817	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Steve Wendell	PSP	
105464819	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Stringtown	PSP	
105464821	Sub-Distribution Asset	Substation	Evansville	Evansville	Substation Rebuild	E560-2_Elec Substa_Substa Expansion_Tepe Park Expansion	PSP	
105464828	Sub-Distribution Asset	Substation	Evansville	Wadesville	Substation Rebuild	E560-2_Elec Substa_Substa Rebuild_Wadesville	PSP	
105461604	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z91-1 NW TO PIGEON CREEK REBUILD	PSP	
105461605	Transmission Asset	Transmission	Evansville	Dale	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y64 DALE TAP REBUILD	PSP	
105461931	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z91-2 PIGEON CREEK TO HEIDELBACH REBUILD (OPGW)	PSP	
105462064	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y32-1 PERRY TAP 1 REBUILD	PSP	
105462065	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y42-1 EASTLAND TAP TO Y58 JUNCTION REBUILD	PSP	
105462068	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y53 EAST INDUSTRIAL TO HEIDELBACH REBUILD	PSP	
105462231	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y55 WHIRLPOOL TAP REBUILD	PSP	
105462237	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y58 EPWORTH ROAD TO Z77 JUNCTION REBUILD	PSP	
105462240	Transmission Asset	Transmission	Evansville	Paradise	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y58 PARADISE TAP REBUILD	PSP	
105462242	Transmission Asset	Transmission	Evansville	Lynnville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y64 LYNNVILLE TO HEMENWAY SUBSTATION REBUILD	PSP	
105462244	Transmission Asset	Transmission	Evansville	Chandler	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Y68 Vigo Tap Rebuild	PSP	
105462246	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z80-1 NE TO ELLIOTT REBUILD	PSP	
105462248	Transmission Asset	Transmission	Evansville	Petersburg	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z80-2 FRANCISCO TO ELLIOTT REBUILD	PSP	
105462489	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z85-2 WARRICK NORTH TO LINCOLN AVE REBUILD	PSP	
105462491	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z95 NW TO Z69 JUNCTION AND RED BANK ROAD REBUILD	PSP	

## CEI South - Electric TDSIC Plan Projects

SAP No.	T or D Asset	ABM	OC	City	TDSIC Program	SAP Description	Current Planned Year	Original Capital Estimate
105462494	Transmission Asset	Transmission	Evansville	Evansville	Transmission Line Rebuild	E560-2_Elec Tran_Line Rebuild_Z96 AB BROWN TO BRECHENDERSON REBUUILD	PSP	
104848384	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Chateau Village Complex Cable Repl	PSP	
104848736	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Lawndale Commons Cable Repl	PSP	
104849054	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Valley Rose Cable Replacement	PSP	
104849846	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Christmas Lake Village Ph 1	PSP	
104850365	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_University Plaza Cable Replacement	PSP	
104852140	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Christmas Lake Village Ph 3	PSP	
104852141	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Christmas Lake Village Ph 4	PSP	
105250305	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Devonshire Apartments	PSP	
105250306	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Burch Industrial Ph 1	PSP	
105251047	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Cross Valley	PSP	
105251195	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Old Newburgh	PSP	
105251453	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Pleasant Ridge Drive	PSP	
105252923	Distribution Asset	Distribution	Mount Vernon	New Harmony	Underground Rebuild	E560-2_Elec Dist_UG Reblid_North Street	PSP	
105253351	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_American Way	PSP	
105779554	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_N Boeke Road	PSP	
105780267	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Hebron Office II	PSP	
105782142	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Timberlake on Kratzville	PSP	
105782147	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Maxwell Avenue URD	PSP	
106175559	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Marrs Ckt Ph 1 URD	PSP	
106175561	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_McCutchanville Ckt Ph 1	PSP	
106350503	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Baseline Ckt Ph 1	PSP	
106350505	Distribution Asset	Distribution	Evansville	Evansville	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Baseline Ckt Ph 2	PSP	
106351157	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Paulie Drive	PSP	
106351158	Distribution Asset	Distribution	Boonville	Newburgh	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Bellwood Subdivision	PSP	
106351162	Distribution Asset	Distribution	Mount Vernon	Mount Vernon	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Waterstone Subdivision	PSP	
106351969	Distribution Asset	Distribution	Rockport	Santa Claus	Underground Rebuild	E560-2_Elec Dist_UG Reblid_Christmas Lake Village Ph 8	PSP	