FILED June 21, 2024 INDIANA UTILITY REGULATORY COMMISSION

### **STATE OF INDIANA**

#### INDIANA UTILITY REGULATORY COMMISSION

PETITION OF SOUTHERN INDIANA GAS AND ) ELECTRIC COMPANY D/B/A CENTERPOINT ) ENERGY INDIANA SOUTH ("CEI SOUTH") FOR ) APPROVAL OF A CHANGE IN ITS FUEL COST ) ADJUSTMENT FOR ELECTRIC SERVICE IN ) ACCORDANCE WITH THE ORDER OF THE ) **COMMISSION IN CAUSE NO. 37712 EFFECTIVE** ) JUNE 18, 1986, AND SENATE BILL NO. 529 ) **EFFECTIVE APRIL 11, 1979** )

CAUSE NO. 38708 FAC 143

## INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

## **PUBLIC'S EXHIBIT NO. 1**

### PRE-FILED TESTIMONY OF GREGORY T. GUERRETTAZ, CPA

June 21, 2024

Respectfully submitted,

Lorraine Hitz Attorney No. 18006-29 Deputy Consumer Counselor

# OFFICE OF UTILITY CONSUMER COUNSELOR Pre-Filed Testimony of Gregory T. Guerrettaz, CPA Review of Fuel Cost Adjustment CAUSE NO. 38708 FAC 143

## **CEI SOUTH**

| 1  | Q: | Please state your name and business address.   |
|----|----|--|
| 2  | A: | My name is Gregory T. Guerrettaz. I am a CPA and a Municipal Advisor. My office is         |
| 3  |    | located at 2680 East Main Street, Suite 223, Plainfield, Indiana 46168. My qualifications  |
| 4  |    | are attached to this testimony as Appendix A.  |
| 5  | Q: | What is the purpose of your testimony in this Cause?                                       |
| 6  | A: | The purpose of my testimony in this Cause is to give an opinion on behalf of the Office of |
| 7  |    | Utility Consumer Counselor ("OUCC") concerning Southern Indiana Gas and Electric           |
| 8  |    | Company's d/b/a CenterPoint Energy Indiana South's ("CEI South" or "Petitioner")           |
| 9  |    | Application for Approval of Fuel Cost Charge, which was filed on May 17, 2024. My          |
| 10 |    | testimony will discuss:  |
| 11 |    | Whether CEI South calculated the fuel cost element of the proposed fuel cost               |
| 12 |    | adjustment in conformity with the requirements of Ind. Code § 8-1-2-42 and applicable      |
| 13 |    | orders from the Indiana Utility Regulatory Commission ("Commission");                      |
| 14 |    | Whether the fuel costs paid by CEI South, when compared to fuel costs recovered            |
| 15 |    | by CEI South for the period ended February 29, 2024, resulted in a variance which was      |
| 16 |    | used to calculate the fuel cost adjustment for the quarter ended October 31, 2024, in      |
| 17 |    | conformity with the requirements of I.C. § 8-1-2-42;                                       |
| 18 |    | Whether the level of net operating income experienced by CEI South for the twelve          |
| 19 |    | months ended February 29, 2024 was greater than that granted in CEI South's last general   |

| 1        |           | rate proceeding, Cause No. 43839; and   |
|----------|-----------|---|
| 2        |           | Whether the fuel cost adjustment factor for the quarter ended February 29, 2024   |
| 3        |           | has been properly applied in conformity with the requirements of Cause Nos. 38708 FAC   |
| 4        |           | 140 and FAC 141.  |
| 5<br>6   | Q:        | To the extent you do not address a specific item in your testimony, should it be construed to mean you agree with Petitioner's proposals? |
| 7        | <b>A:</b> | No. My silence on any topics, issues, or items Petitioner proposes does not indicate my   |
| 8        |           | approval of these topics, issues, or items. Rather, the scope of my testimony is limited to   |
| 9        |           | the specific topics discussed herein.   |
| 10       | Q:        | Please explain Schedule A.  |
| 11       | <b>A:</b> | Schedule A presents the components of CEI South's proposed fuel cost factors by class for   |
| 12       |           | electric service and shows how the components are used in the calculation. The proposed   |
| 13       |           | fuel cost adjustment has been calculated in conformity with I.C. § 8-1-2-42, I.C. § 8-1-2-  |
| 14       |           | 42.3 and numerous Commission orders affecting this filing. Schedule A also demonstrates   |
| 15       |           | that the fuel cost paid by CEI South, when compared to the fuel costs recovered from CEI  |
| 16       |           | South's customers for the quarter ended February 29, 2024, resulted in a variance which   |
| 17       |           | was used to calculate the fuel cost adjustments for the quarter ending October 31, 2024,  |
| 18       |           | less the base cost of fuel by class.  |
| 19<br>20 | Q:        | Has CEI South exceeded the level of net operating income granted in the Commission's Cause No. 43839 Final Order?                         |
| 21       | <b>A:</b> | No. As shown on Schedule B, CEI South has not exceeded its authorized return.   |
| 22<br>23 | Q:        | Since there are no over-earnings on Schedule B in this FAC, does the OUCC need to review the sum of the "earnings bank"?                  |
| 24       | <b>A:</b> | Yes, the OUCC needs to consistently evaluate the "earnings differential." As can be seen  |
| 25       |           | from Schedule B-1, the sum of differentials for the relevant period is (\$598,730,968),   |

| 1        |           | which has accumulated from the period of May 2011 with FAC 92 to FAC 143. Therefore,                   |
|----------|-----------|--|
| 2        |           | unless and until the earnings bank turns positive and there are over-earnings, no adjustment           |
| 3        |           | for excess earning will take place.  |
| 4<br>5   | Q:        | Did you review the adjustments requested by CEI South in Petitioner's Exhibit No. 3, Attachment MJJ-1? |
| 6        | <b>A:</b> | Yes. CEI South removed the Regional Expansion Criteria Benefit ("RECB") revenue per                    |
| 7        |           | the Final Order in Cause No. 43839, as shown on CEI South's Exhibit No. 3, Attachment                  |
| 8        |           | MJJ-1, page 1. Page 3 of the same exhibit shows the actual amount of the net adjustment                |
| 9        |           | to Operating Income of (\$7,265,206). On Schedule MJJ-1, page 1, this amount has been                  |
| 10       |           | rounded to (\$7,265,000).  |
| 11       | Q:        | Why are the RECB adjustments presented as a net number?  |
| 12       | <b>A:</b> | The RECB adjustment is actually a series of adjustments. CEI South adjusts revenue and                 |
| 13       |           | expense (as shown on CEI South's Exhibit No. 3, Attachment MJJ-1, page 3). During the                  |
| 14       |           | audit, the OUCC reviewed the recording of the revenue associated with the RECB and                     |
| 15       |           | related expense adjustments, which are tied back to CEI South's work papers. CEI South                 |
| 16       |           | also annually updates the calendar year numbers for the true-up of the actual revenues and             |
| 17       |           | expenses for the latest order.   |
| 18       | Q:        | What additional adjustment is presented on Schedule B of this filing?                                  |
| 19       | <b>A:</b> | CEI South adjusted its Authorized Return Calculation for the allowed Operating Income                  |
| 20       |           | Adjustment per various orders as outlined on Exhibit No. 3, Attachment MJJ-3.                          |
| 21<br>22 | Q:        | Did CEI South make an additional adjustment that impacted the Income Statement in this FAC?            |
| 23       | <b>A:</b> | Yes. As authorized in the Order in Cause No. 44909 CECA 3, the Net Operating Income                    |
| 24       |           | FAC earnings test must be adjusted for the Troy Solar Facility ("Troy"). The adjustment                |
| 25       |           | was (\$1,810,564) after netting actual revenues and expenses, which has been rounded to                |

1 (\$1,811,000).

## 2 Q: What other procedures did the OUCC perform during the audit?

- 3 A: The OUCC updated its income statement model and reviewed the RECB and Troy revenue 4 and expense items line by line. These adjustments were made to eliminate the impact of 5 related RECB and Troy projections on the income statement. As a result of the OUCC's detailed review of the monthly RECB and Troy revenues and expenses, the OUCC is 6 7 satisfied the RECB adjustments are proper, as presented on CEI South's Exhibit No. 3, 8 Attachment MJJ-1, page 3. In addition, adjustments were made to the Authorized Return 9 on a pro rata basis for various TDSIC, ECA and CECA orders. 10 Please explain Schedule C. **Q**: 11 Schedule C compares CEI South's pro-forma operating expenses approved by the A: 12 Commission in Cause No. 43839 with the actual operating expenses incurred by CEI South 13 for the twelve months ending February 29, 2024. The purpose of this comparison is to 14 determine whether CEI South had actual decreases in other operating expenses which could 15 be used to offset increases in fuel cost. As can be seen on Schedule C, CEI South did not 16 have decreases in other operating costs which could be used to offset fuel cost increases. 17 **O**: Has the fuel cost adjustment for the three-month period ending February 2024 been applied in conformity with the requirements of Cause Nos. 38708 FAC 140 and FAC 18 141? 19 20 Yes. The fuel cost adjustment approved by the Commission in Cause Nos. 38708 FAC 140 A: 21 and FAC 141 was the amount applied to CEI South's customers' bills for the period 22 approved. 23 Do you have an opinion regarding the figures used by CEI South in its application in **Q**: this cause? 24
- 25 A: Yes. The figures used in the application for a change in fuel cost adjustment for the period

ending February 29, 2024 were supported by CEI South's books, records and source
 documentation for the period reviewed.

**3 Q: Please explain Schedules D and E.** 

4 A: Schedule D sets forth the total fuel cost in mills for the period of January 2020 through

5 February 2024. Schedule E graphically depicts the results of Schedule D.

6 Q: Do you have an opinion regarding the projections used by CEI South for fuel costs
 7 and sales of power for the projected quarter ending October 2024?

Yes. The OUCC thoroughly reviewed CEI South's model supporting the projected period 8 A: 9 during the audit preparation and audit. CEI South and the OUCC reviewed the inputs during the audit to ensure the information entered was reflective of the current market costs 10 11 for commodities used to generate power. At the time of the audit, CEI South provided 12 current natural gas prices, which were slightly lower than those used in CEI's forecast. In 13 addition, on-peak and off-peak power prices were similar to the forecast numbers at the 14 time of the audit. Currently, only a small portion of CEI South's generation is driven by 15 natural gas prices. During the audit, the OUCC noted that the cost of supply, or Fuel  $\div$ Sales (F÷S), was projected to be 32.820 Mills/KWh. The OUCC also notes that CEI entered 16 17 into a short-term power agreement. While the details of the contract are confidential, the 18 OUCC's review indicates that the contract will benefit customers during high usage periods 19 at a reasonable cost.

20 (

## **Q:** What items have affected the FAC factor?

A: The OUCC reviewed several items that normally impact the FAC factor. Purchased power
 prices were strong during the months of December 2023, January 2024, and February 2024.
 The power prices and the lower Inter-System Sales through MISO (Schedule 5, page 4 in
 Witness Ankenbrand's attachments) affected the weighted average deviation for the three-

| 24<br>25<br>26 | Q:        | Do you have any comments regarding: 1) applicability of Cause No. 43414 as it relates<br>to purchased power over the benchmark; 2) the effect of contestable revenue<br>sufficiency guarantee ("RSG") charges; 3) ancillary services market ("ASM"); 4) bill |
|----------------|-----------|--|
| 23             |           | another.   |
| 22             |           | \$5,692.28. The negative LMPs associated with the wind farms vary from one FAC to  |
| 21             |           | total \$40,702.24, an increase from CEI South's FAC 142 where the charges totaled  |
| 20             |           | Wind Farm experienced 401 negative LMP hours. The total charges for both wind farms  |
| 19             | <b>A:</b> | Fowler Ridge II Wind Farm experienced 57 hour of negative LMPs and Benton County   |
| 17<br>18       | Q:        | What level of negative Locational Marginal Pricing ("LMP") did CEI South experience during the historical period of this FAC?  |
| 16             | A:        | Schedule H is the schedule setting forth the MISO cost flow-through in this FAC.   |
| 15             | Q:        | Please explain Schedule H.   |
| 14             |           | Cause No. 43839, the historical period shows FAC 120 and thereafter.   |
| 13             | A:        | Schedule G reflects the proposed fuel cost adjustment factors. As a result of the Order in   |
| 12             | Q:        | Please explain Schedule G.   |
| 11             |           | 5, pages 1-4.  |
| 10             |           | period. The source document is Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule  |
| 9              | A:        | Schedule F is the comparison of actual fuel costs and estimated fuel costs for the FAC   |
| 8              | Q:        | Please explain Schedule F.   |
| 7              |           | several new generating units are expected to be placed in service by 2025.   |
| 6              | <b>A:</b> | CEI South does not expect the purchased power requirement to continue into 2025 because  |
| 5              | Q:        | Is this purchased power requirement likely to continue into the near future?   |
| 4              |           | costs were lower on an actual basis overall.   |
| 3              |           | February 2024. CEI South's Schedule 5 shows that numerous components changed and   |
| 2              |           | deviations were 0.65% in December 2023, 14.21% in January 2024, and 39.96% in  |
| 1              |           | month reconciliation period, resulting in an overall 16.93% deviation. The monthly   |

| 1<br>2<br>3 |           | analysis; 5) steam generation costs; 6) actual cost of fuel (Mills/kWh) comparison; 7) coal inventory; 8) line-loss adjustments; 9) wind farms; 10) commitment status; and 11) Culley Unit 3 forced outages? |
|-------------|-----------|--|
| 4           | A:        | OUCC Witness Michael Eckert will provide updated testimony on these issues.  |
| 5<br>6      | Q:        | Is CEI South requesting recovery of purchased power costs in excess of the daily benchmarks?   |
| 7           | <b>A:</b> | Yes. CEI South had purchased power costs in excess of the daily benchmarks in the amount   |
| 8           |           | of \$46,819.44 in December 2023, \$696,081.43 in January 2024, and \$290,339.96 in   |
| 9           |           | February 2024. The OUCC has determined and agrees with CEI that \$46,853.46 is not   |
| 10          |           | recoverable, therefore, the total pass through this FAC is \$986,387.37.   |
| 11<br>12    | Q:        | If the Commission approves CEI South's proposed fuel cost adjustment, how will this affect residential customers' bills?   |
| 13          | <b>A:</b> | If CEI South's and the OUCC's recommended factor (which are the same) is approved, the   |
| 14          |           | monthly bill for a residential customer using 1,000 kWh would decrease by \$3.01.  |
| 15          | Q:        | What is CEI South's coal inventory status?   |
| 16          | A:        | As of April 30, 2024, CEI South's total coal inventory was at approximately 400,357 tons,  |
| 17          |           | which has increased 69,164 tons since the last FAC.  |
| 18          | Q:        | Is CEI South using a coal decrement or increment?  |
| 19          | A:        | CEI South did not use a coal decrement and has stopped using a coal increment for now.   |
| 20<br>21    | Q:        | Did CEI South use a coal price increment in the calculation of its forecasted cost of fuel during this FAC period?   |
| 22          | <b>A:</b> | No. CEI South did not include an increment in its model for the forecasted period covered  |
| 23          |           | by this FAC. It is the OUCC's understanding CEI South will not use increments going  |
| 24          |           | forward.   |
| 25          | Q:        | Did the OUCC review CEI South's Renewable Energy Certificates ("RECs")?  |
| 26          | A:        | Yes. CEI South provided information regarding the sales of RECs in the reconciliation  |
| 27          |           | period. The information supported the reduction in the purchased power cost by   |

- 1 (\$1,738,895.54), as discussed on page 12 in F. Shane Bradford's testimony. CEI South has 2 again achieved a high level of credits for customers' benefit by reducing the fuel cost. 3 **Q**: What additional items were discussed and reviewed during the audit? 4 The OUCC's audit consisted of going through items either identified in advance or during A: 5 the audit that required further confidential discussion and information. A partial list of the 6 important items which the OUCC spent considerable time reviewing is included below. In 7 general, the quarterly audit was focused on unit availability, new energy purchases and 8 accounting treatment, significant operational or economic events occurring over the 9 quarter, the effect of the current and projected burn on coal contracts, unusual LMP prices 10 during the quarter, income statement issues or changes, and any significant event changes 11 to any item affecting the FAC. The OUCC's review of the listed topics is very important, 12 given FAC inputs are ever-changing and complex. 13 **Q**: Did the audit generate any other concerns or additional information? 14 **A:** Yes. CEI South's testimony explained the gas purchasing and hedging strategy that it has 15 developed and used over the winter. During the audit, the OUCC and CEI South discussed 16 actual winter gas purchases and CEI South is keeping the OUCC informed. The OUCC 17 recommends that CEI South provide detailed testimony on CEI South's gas purchasing 18 hedges and any other hedging practices going forward. 19 Please summarize the OUCC's recommendations. **O**: 20 A: The OUCC believes the information provided by CEI South in its testimony, workpapers, 21 the two day audit, and the follow-up questions assisted the OUCC in arriving at an opinion 22 on the factor. The OUCC recommends that the Commission approve CEI's factor, which
- has been verified by the OUCC as shown on Schedule A.
- 24 Q: Does this conclude your pre-filed testimony?

Public's Exhibit No. 1 Cause No. 38708 FAC 143 Page 9 of 12

1 **A:** Yes.

## **Appendix A - Qualifications of Gregory T. Guerrettaz**

| 1  | Q: | Please state your name, title, and business address.  |
|----|----|---|
| 2  | A: | My name is Gregory T. Guerrettaz. I am a CPA. My office is located at 2680 East Main            |
| 3  |    | Street, Suite 223, in Plainfield, Indiana 46168.  |
| 4  | Q: | By whom are you employed and what is your position?   |
| 5  | A: | Gregory T. Guerrettaz, CPA is a wholly owned subsidiary of Financial Solutions Group,           |
| 6  |    | Inc. (Formed in 1998) which is registered with the Securities and Exchange Commission           |
| 7  |    | (SEC), effective January 1, 2011. I am employed as President of Financial Solutions             |
| 8  |    | Group, Inc. ("FSG Corp."), a public finance and utility rate consulting firm.                   |
| 9  | Q: | Please summarize your educational and professional qualifications.                              |
| 10 | A: | I received a Bachelor's degree in Accounting from Indiana University. During my                 |
| 11 |    | employment, I have attended and spoken at numerous seminars on governmental                     |
| 12 |    | accounting and finance throughout the United States. I continue to maintain all                 |
| 13 |    | requirements under Continuing Professional Education.   |
| 14 | Q: | How long have you been employed by FSG Corp., and in what capacities?                           |
| 15 | A: | I founded FSG Corp. in 1998 and am employed as the President of the company. FSG                |
| 16 |    | Corp.'s practice is split about 50% utility and 50% finance related. I have been responsible    |
| 17 |    | for numerous projects, including utility rate engagements, cost of capital analyses and rate    |
| 18 |    | of return, utility financial analyses, utility business valuations, other projects related to a |
| 19 |    | variety of utility issues and preparation of electric trackers for utilities in the State of    |
| 20 |    | Indiana.  |
| 21 |    | I have pre-filed written, and given oral, testimony to the Indiana Utility Regulatory           |

22 Commission on a variety of issues over the years including, but not limited to, revenue

- requirement calculations, accounting methodology and related areas, utility historical and
   pro-forma financial information, cost of capital analysis, rate structure and cost of service
   issues, issuance of both long and short-term debt, utility operating information, utility
   trackers and a variety of other utility related issues.
- 5 I prepare activity-based budgets and assist communities in the preparation of both short 6 and long-range plans for all types of entities. I have served as Financial Advisor for over 7 two billion dollars of tax-exempt and taxable securities. FSG Corp. is registered with the 8 Security and Exchange Commission (SEC) and the Municipal Security Rulemaking Board 9 (MSRB), and currently I hold a Series 50 and 54 license as a Municipal Advisor and Chief 10 Compliance Officer.
- 11 Q: Please state your experience prior to joining FSG Corp.

12 A: I was employed for 8 years with a national accounting firm in Indianapolis. I was a partner in that firm for 4 years and, for 4 years was a partner in a partnership between that firm and 13 14 Municipal Consultants, Inc. Prior to that, Municipal Consultants, Inc. employed me for 7 15 vears (4 of those as a shareholder) until the partnership and eventual merger with the 16 national accounting firm. While at Municipal Consultants, Inc., I reviewed, prepared and 17 analyzed over 900 FAC filings by various electric utilities. I also testified numerous times, 18 over the seven years, regarding the earnings and return tests. Preceding my time with 19 Municipal Consultants, Inc., I worked for 3 years as a Staff Accountant for the Accounting 20 Department of the Public Service Commission of Indiana, now known as the Indiana 21 Utility Regulatory Commission. In this position, I prepared and presented testimony in 22 major electric and water cases. I have performed utility reviews since 1981. I have also

| 1 | performed a   | variety | of | feasibility | and | cost-of-service | studies, | for | cities | and | counties |
|---|---------------|---------|----|-------------|-----|-----------------|----------|-----|--------|-----|----------|
| 2 | throughout In | idiana. |    |             |     |                 |          |     |        |     |          |

- 3 I am a Certified Public Accountant licensed in the State of Indiana, and am a member of
- 4 the American Institute of Certified Public Accountants and the Indiana CPA Society. I am
- 5 an Associate Member of the Association of Indiana Counties and the Indiana Association
- of Cities and Towns. I have served as the Chairman of the Indiana CPA Utilities
  Committee in the past.

## **Calculation of Proposed Fuel Cost Adjustment Factors**

| CEI South - Requested (1)                 | RS, B, SGS,<br>OSS, SL, OL | DGS        | LP         | HLF        | Total Special<br>Contracts |
|---|----------------------------|------------|------------|------------|----------------------------|
|   | / /                        |            |            |            |                            |
| Fuel Cost Adjusted for Line Losses        | 32.142                     | 32.132     | 31.314     | 30.435     | 33.300                     |
| Estimated Cost of Company Use             | 0.092                      | 0.092      | 0.092      | 0.092      | 0.092                      |
| Less: Base Cost of Fuel included in Rates | 38.295                     | 38.275     | 37.123     | 35.883     |                            |
| Fuel Cost Charge per kWh Sold             | \$ (6.061)                 | \$ (6.051) | \$ (5.717) | \$ (5.356) | \$ 33.392                  |

## Comparison of Authorized Return with Actual Net Operating Income (000's Omitted)

#### Actual Twelve Months Ending February 29, 2024

| Total Company Operating Revenue      | \$<br>586,053 |
|--------------------------------------|---------------|
| Total Company Operating Expense      | 510,862       |
| Adjustment for RECB Operating Income | (7,265)       |
| Adjustment for CECA Operating Income | <br>(1,811)   |
| Total Company Net Operating Income   | \$<br>66,115  |

#### Per Cause No. 43839

| Total Company Operating Revenue            | \$<br>587,677 |  |
|--|---------------|--|
| Total Company Operating Expense            | <br>37,338    |  |
| Total Company Net Operating Income         | \$<br>94,450  |  |
| Adjustment for 44910 TDSIC                 | \$<br>22,447  |  |
| Adjustment for 45052 ECA                   | \$<br>10,096  |  |
| Adjustment for 44909 CECA                  | \$<br>755     |  |
| Total Authorized Electric Operating Income | \$<br>127,748 |  |
| Over (Under) <b>(Rounded)</b>              | \$ (61,633)   |  |

Source: Petitioner's Exhibit No. 3, Attachments MJJ-1

### OFFICE OF UTILITY CONSUMER COUNSELOR REVIEW OF FUEL COST ADJUSTMENT

Southern Indiana Gas & Electric Company (CEI South) Cause No. 38708 FAC 143

ause No. 38708 FAC 143

#### **Excess (Under) Earnings for Relevant Period**

|         | Reported   |               |                |                 |
|---------|------------|---------------|----------------|-----------------|
|         | Earnings   | Determined    | Authorized     |                 |
| FAC No. | Period     | Return        | Return         | Differential    |
| 143     | 2/29/2024  | \$ 66,115,000 | \$ 127,747,866 | \$ (61,632,866) |
| 142     | 11/30/2023 | 80,422,000    | 126,567,996    | (46,145,996)    |
| 141     | 8/31/2023  | 72,304,000    | 125,409,629    | (53,105,629)    |
| 140     | 05/31/2023 | 77,971,000    | 123,939,731    | (45,968,731)    |
| 139     | 2/28/2023  | 80,869,000    | 122,536,732    | (41,667,732)    |
| 138     | 11/30/2022 | 87,074,000    | 121,130,132    | (34,056,132)    |
| 137     | 8/31/2022  | 96,641,000    | 119,788,316    | (23,147,316)    |
| 136     | 5/31/2022  | 98,998,000    | 118,247,006    | (19,249,006)    |
| 135     | 02/28/22   | 123,574,000   | 116,754,782    | 6,819,218       |
| 134     | 11/30/21   | 121,126,000   | 115,303,103    | 5,822,897       |
| 133     | 08/31/21   | 115,563,000   | 113,411,115    | 2,151,885       |
| 132     | 05/31/21   | 114,660,000   | 111,699,522    | 2,960,478       |
| 131     | 02/28/21   | 82,178,000    | 109,912,339    | (27,734,339)    |
| 130     | 11/30/20   | 83,172,000    | 108,117,468    | (24,945,468)    |
| 129     | 08/31/20   | 85,829,000    | 106,655,921    | (20,826,921)    |
| 128     | 05/31/20   | 84,517,000    | 105,445,027    | (20,928,027)    |
| 127     | 02/29/20   | 69,490,000    | 103,563,749    | (34,073,749)    |
| 126     | 11/30/19   | 63,953,000    | 101,443,510    | (37,490,510)    |
| 125     | 08/31/19   | 68,468,000    | 99,508,289     | (31,040,289)    |
| 124     | 05/31/19   | 66,989,000    | 97,572,451     | (30,583,451)    |
| 123     | 02/28/19   | 86,690,000    | 96,473,762     | (9,783,762)     |
| 122     | 11/30/18   | 93,270,000    | 95,669,743     | (2,399,743)     |
| 121     | 08/31/18   | 89,537,000    | 95,176,846     | (5,639,846)     |
| 120     | 05/31/18   | 88,143,000    | 94,677,293     | (6,534,293)     |
| 119     | 02/28/18   | 85,321,000    | 94,534,973     | (9,213,973)     |
| 118     | 11/30/17   | 85,326,000    | 94,450,297     | (9,124,297)     |
| 117     | 08/31/17   | 85,974,000    | 94,450,297     | (8,476,297)     |
| 116     | 05/31/17   | 91,155,000    | 94,450,297     | (3,295,297)     |
| 115     | 02/28/17   | 93,364,000    | 94,450,297     | (1,086,297)     |
| 114     | 11/30/16   | 95,570,000    | 94,450,297     | 1,119,703       |
| 113     | 08/31/16   | 96,254,000    | 94,450,297     | 1,803,703       |
| 112     | 05/31/16   | 93,672,000    | 94,450,297     | (778,297)       |
| 111     | 02/29/16   | 95,530,000    | 94,450,297     | 1,079,703       |
| 110     | 11/30/15   | 95,869,000    | 94,450,297     | 1,418,703       |
| 109     | 08/31/15   | 93,783,000    | 94,450,297     | (667,297)       |
| 108     | 05/31/15   | 93,435,000    | 94,450,297     | (1,015,297)     |
| 107     | 02/28/15   | 93,330,000    | 94,450,297     | (1,120,297)     |
| 106     | 11/30/14   | 95,474,000    | 94,450,297     | 1,023,703       |
| 105     | 08/31/14   | 97,226,000    | 94,450,297     | 2,775,703       |
| 104     | 05/31/14   | 95,418,000    | 94,450,297     | 967,703         |
| 103     | 02/28/14   | 96,194,000    | 94,450,297     | 1,743,703       |
| 102     | 11/30/13   | 91,010,000    | 94,450,297     | (3,440,297)     |
| 101     | 08/31/13   | 85,115,000    | 94,450,297     | (9,335,297)     |
| 100     | 05/31/13   | 89,817,000    | 94,450,297     | (4,633,297)     |
| 99      | 02/28/13   | 89,149,000    | 94,450,297     | (5,301,297)     |
| 98      | 11/30/12   | 89,362,000    | 94,450,297     | (5,088,297)     |
| 97      | 08/31/12   | 97,859,000    | 94,450,297     | 3,408,703       |
| 96      | 05/31/12   | 101,139,000   | 94,450,297     | 6,688,703       |
| 95      | 02/29/12   | 94,769,000    | 92,767,710     | 2,001,290       |
| 94      | 11/30/11   | 93,617,000    | 90,364,015     | 3,252,985       |
| 93      | 08/31/11   | 86,467,000    | 87,933,611     | (1,466,611)     |
| 92      | 05/31/11   | 82,703,000    | 85,476,500     | (2,773,500)     |
|         | ,          | _ , ,         |                | (1,1,2,2,2,0)   |

Sum of Differential for Relevant Period

\$ (598,730,968)

## Comparison of Pro-Forma Operating Expense with Actual Operating Expense (000's Omitted)

## Actual Twelve Months Ending February 29, 2024

| Total Operating Expense                                   | \$<br>510,862           |
|---|-------------------------|
| Less: Fuel Cost<br>Coal & Oil/Gas<br>Purchased Power Fuel | \$<br>115,824<br>53,374 |
| Operating Expense excluding Fuel Cost                     | \$<br>341,664           |

### Per Cause No. 43839

| Total Operating Expense                                   | \$<br>493,227 |
|---|---------------|
| Less: Fuel Cost<br>Coal & Oil/Gas<br>Purchased Power Fuel | \$<br>222,189 |
| Operating Expense excluding Fuel Cost                     | \$<br>271,038 |

Over (Under)

\$ 70,626

Source: Petitioner's Exhibit No. 3, Attachment MJJ-1, Page 1 of 3

#### Actual Cost of Fuel to Generate Electricity and

#### the Actual Cost of Fuel Included in the Cost of Purchased Power

| Line<br>No. | Description   | January<br>2020 | February<br>2020 | March<br>2020 | April<br>2020 | May<br>2020  | June<br>2020  | July<br>2020  | August<br>2020 | September<br>2020 | October<br>2020 | November<br>2020 | December<br>2020 |
|-------------|---|-----------------|------------------|---------------|---------------|--------------|---------------|---------------|----------------|-------------------|-----------------|------------------|------------------|
| KWH So      | urce (000's) :  |                 |                  |               |               |              |               |               |                |                   |                 |                  |                  |
| 1.          | Steam Generation  | 357,541         | 303,481          | 191,292       | 122,381       | 267,213      | 424,909       | 510,050       | 466,725        | 288,177           | 288,662         | 281,780          | 458,718          |
| 2.          | Nuclear Generation  | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 3.          | Hydro Generation  | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 4.          | Other Generation  | 2,432           | 3,040            | 2,911         | 1,940         | 3,039        | 2,820         | 9,107         | 5,280          | 2,395             | 3,455           | 3,062            | 2,178            |
| 5.          | Purchases through MISO                                    | 44,200          | 53 <i>,</i> 539  | 132,742       | 153,703       | 54,057       | 23,420        | 15,776        | 18,978         | 103,667           | 77,486          | 57,913           | 6,690            |
| 6.          | Purchased Power other than MISO                           | 31,193          | 29,448           | 29,442        | 25,820        | 20,374       | 24,350        | 19,230        | 16,929         | 19,776            | 26,989          | 40,952           | 33,555           |
| 7.          | Purchased Power for Other Systems                         | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 8.          | Interchange Power-In                                      | 497,157         | 432,970          | 572,011       | 595,805       | 565,679      | 557,859       | 614,398       | 673,609        | 796,229           | 639,485         | 824,515          | 824,243          |
| 9.          | Interchange Power-Out                                     | 485,527         | 430,720          | 562,619       | 587,742       | 560,287      | 551,488       | 609,779       | 663,042        | 788,029           | 632,560         | 817,107          | 817,790          |
|             | Less:   |                 |                  |               |               |              |               |               |                |                   |                 |                  |                  |
| 10.         | Inter-System Sales through MISO                           | 45,806          | 15,835           | 1,919         | 1,339         | 13,902       | 41,929        | 43,479        | 47,018         | 10,505            | 30,373          | 18,126           | 114,521          |
| 11.         | Inter-System Sales other than MISO                        | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 12.         | Energy Losses and Company Use                             | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 13.         | Retail - Back-Up Sales                                    | -               |                  |               | 1,897         |              | -             |               |                |                   | -               |                  | -                |
| 14.         | Supply (S)  | 401,191         | 375,923          | 363,860       | 308,671       | 336,172      | 439,941       | 515,303       | 471,461        | 411,709           | 373,144         | 372,989          | 393,073          |
| Fuel Cos    | t \$ (F) :  |                 |                  |               |               |              |               |               |                |                   |                 |                  |                  |
| 15.         | Steam Generation  | \$ 8,836,424    | \$ 7,776,609     | \$ 4,998,593  | \$ 3,390,569  | \$ 7,007,613 | \$ 10,626,206 | \$ 12,650,878 | \$ 11,745,803  | \$ 7,304,863      | \$ 7,233,055    | \$ 7,187,541     | \$ 11,377,556    |
| 16.         | Nuclear Generation  | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 17.         | Hydro Generation  | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 18.         | Other Generation  | 87,709          | 88,354           | 83,395        | 20,494        | 93,157       | 55,644        | 299,113       | 164,585        | 45,253            | 123,152         | 97,017           | 34,683           |
| 19.         | Purchases through MISO                                    | 927,222         | 1,156,794        | 2,778,196     | 2,999,444     | 1,060,852    | 386,127       | 336,667       | 382,598        | 2,007,669         | 1,694,277       | 1,247,303        | 151,474          |
| 20.         | MISO Components of Cost of Fuel                           | (81,929)        | (142,569)        | (47,432)      | (157,848)     | (300,780)    | 24,114        | (36,267)      | (119,985)      | (203,347)         | (210,047)       | 590,068          | 37,010           |
| 21.         | Purchased Power other than MISO                           | 2,016,583       | 1,528,652        | 1,703,593     | 1,850,271     | 1,414,341    | 1,165,850     | 725,750       | 502,945        | 1,197,804         | 1,596,097       | 2,718,819        | 1,588,196        |
| 22          | Less:   | 1 005 041       | 201 17/          | 40.012        | 25 750        | 204 (10      | 050 001       | 0(0.054       | 021 202        | 21 ( 200          |                 | 204.974          | 2 416 624        |
| 22.         | Inter-System Sales through MISO                           | 1,095,841       | 381,176          | 40,913        | 25,758        | 294,619      | 852,281       | 868,254       | 921,383        | 216,308           | 615,975         | 394,864          | 2,416,624        |
| 23.         | Inter-System Sales other than MISO<br>Transmission Losses | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 24.         |   | -               | -                | -             | -             | -            | -             | -             | -              | -                 | -               | -                | -                |
| 25.<br>26.  | Retail - Back-up Sales                                    | -               | -                | -             | 37,967        | -            | -             | -             | -              | -                 | -               | -                | -                |
| 26.         | Retail Portion of Coal Deferral Amortization              |                 |                  |               |               |              |               |               |                |                   |                 |                  | -                |
| 27.         | Total Fuel Costs (F) :                                    | \$ 10,690,168   | \$ 10,026,664    | \$ 9,475,432  | \$ 8,039,205  | \$ 8,980,564 | \$ 11,405,660 | \$ 13,107,887 | \$ 11,754,563  | \$10,135,934      | \$ 9,820,559    | \$11,445,884     | \$10,772,295     |
| 28.         | F/S (Mills/KWH) :   | \$ 26.646       | \$ 26.672        | \$ 26.041     | \$ 26.045     | \$ 26.714    | \$ 25.925     | \$ 25.437     | \$ 24.932      | \$ 24.619         | \$ 26.318       | \$ 30.687        | \$ 27.405        |

| Line<br>No. | Description                                  | January<br>2021 | February<br>2021 | March<br>2021 | April<br>2021 | May<br>2021   | June<br>2021  | July<br>2021  | August<br>2021 | September<br>2021 | October<br>2021 | November<br>2021 | December<br>2021 |
|-------------|--|-----------------|------------------|---------------|---------------|---------------|---------------|---------------|----------------|-------------------|-----------------|------------------|------------------|
| KWH So      | urce (000's) :                               |                 |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 1.          | Steam Generation                             | 479,578         | 492,284          | 467,146       | 440,979       | 450,411       | 489,630       | 546,025       | 598,103        | 611,623           | 471,980         | 359,306          | 306,064          |
| 2.          | Nuclear Generation                           | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 3.          | Hydro Generation                             | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 4.          | Solar Generation                             | -               | -                | -             | -             | -             | 12,098        | 12,283        | 11,964         | 10,780            | 6,914           | 5,685            | 3,616            |
| 5.          | Other Generation                             | 3,632           | 5,447            | 8,041         | 15,384        | 16,568        | 8,454         | 7,257         | 11,659         | 3,661             | 3,964           | 6,805            | 5,384            |
| 6.          | Purchases through MISO                       | 19              | 1,019            | 448           | (84)          | 12,404        | 16,660        | 13,724        | 13,554         | 82                | 1,969           | 2,029            | 21,040           |
| 7.          | Purchased Power other than MISO              | 25,706          | 30,794           | 37,392        | 33,330        | 23,234        | 24,958        | 22,150        | 23,632         | 30,722            | 21,904          | 31,493           | 35,774           |
| 8.          | Purchased Power for Other Systems            | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 9.          | Interchange Power-In                         | 902,909         | 815,288          | 647,128       | 437,545       | 565,727       | 701,684       | 690,682       | 683,281        | 469,001           | 531,870         | 519,002          | 663,364          |
| 10.         | Interchange Power-Out                        | 889,225         | 805,062          | 639,572       | 430,768       | 560,378       | 694,482       | 680,859       | 673,576        | 459,656           | 521,911         | 513,049          | 657,719          |
|             | Less:  |                 |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 11.         | Inter-System Sales through MISO              | 117,748         | 150,284          | 165,044       | 158,521       | 84,346        | 88,621        | 123,764       | 153,894        | 246,973           | 90,965          | 62,742           | 14,454           |
| 12.         | Inter-System Sales other than MISO           | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 13.         | Energy Losses and Company Use                | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 14.         | Retail - Back-Up Sales                       |                 | 171              | 1,719         |               |               | 8,776         |               | 5,531          | -                 | -               | -                | -                |
| 15.         | Supply (S)                                   | 404,872         | 389,315          | 353,820       | 337,865       | 423,620       | 461,605       | 487,498       | 509,192        | 419,240           | 425,725         | 348,529          | 363,069          |
| Fuel Cost   | \$ (F) :                                     |                 |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 16.         | Steam Generation                             | 12,024,383      | 12,707,839       | 11,762,799    | 11,034,823    | 11,507,822    | 12,580,781    | 13,837,516    | 15,320,338     | 15,141,775        | 11,974,579      | 9,385,805        | 8,444,701        |
| 17.         | Nuclear Generation                           | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 18.         | Hydro Generation                             | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 19.         | Excess Distributed Generation                | -               | -                | -             | -             | -             | 6             | 43            | 129            | 201               | 354             | 569              | -                |
| 20.         | Other Generation                             | 18,794          | 125,610          | 69,363.00     | 212,354       | 193,058       | 392,014       | 444,017       | 721,678        | 175,475           | 254,291         | 489,774          | 353,510          |
| 21.         | Purchases through MISO                       | (19,236)        | (193,278)        | 11,342.00     | 5,769         | 282,017       | 419,874       | 648,934       | 633,827        | 11,353            | 283,039         | 74,279           | 1,061,854        |
| 22.         | MISO Components of Cost of Fuel              | 31,237          | (869,580)        | 149,339.00    | 478,089       | (28,523)      | (49,723)      | 154,186       | 115,926        | 306,123           | 605,261         | 990,863          | 477,463          |
| 23.         | Purchased Power other than MISO<br>Less:     | 1,462,044       | 1,909,326        | 2,537,234.00  | 1,798,840     | 1,090,121     | 1,326,270     | 661,423       | 857,760        | 1,735,897         | 1,145,254       | 2,159,091        | 2,579,783        |
| 24.         | Inter-System Sales through MISO              | 2,507,046       | 3,231,772        | 3,563,030.00  | 3,364,416     | 1,734,097     | 1,866,296     | 2,603,198     | 3,662,607      | 5,748,861         | 2,056,500       | 1,616,352        | 367,988          |
| 25.         | Inter-System Sales other than MISO           | 2,007,010       |                  | -             | -             | -             | -             | 2,000,190     | -              | -                 | 2,000,000       | -                | -                |
| 26.         | Transmission Losses                          | -               | -                | _             | -             | -             | _             | -             | -              | -                 | _               | -                | -                |
| 27.         | Retail - Back-up Sales                       |                 | 3,536            | 35,592.00     | (7)           | (76)          | 186,172       |               | 147,051        |                   | (15)            |                  | -                |
| 28.         | Retail Portion of Coal Deferral Amortization |                 | -                | -             |               | -             | -             |               | -              |                   | -               |                  | -                |
| 29.         | Total Fuel Costs (F) :                       | \$ 11,010,176   | \$ 10,444,609    | \$ 10,931,455 | \$ 10,165,466 | \$ 11,310,474 | \$ 12,616,754 | \$ 13,142,921 | \$ 13,840,000  | \$ 11,621,963     | \$ 12,206,293   | \$11,484,029     | \$ 12,549,323    |
| 30.         | F/S (Mills/KWH) :                            | \$ 27.194       | \$ 26.828        | \$ 30.896     | \$ 30.087     | \$ 26.700     | \$ 27.332     | \$ 26.960     | \$ 27.180      | \$ 27.722         | \$ 28.672       | \$ 32.950        | \$ 34.564        |

| Line<br>No. | Description   | January<br>2022 | February<br>2022 | March<br>2022 | April<br>2022 | May<br>2022   | June<br>2022  | July<br>2022  | August<br>2022 | September<br>2022 | October<br>2022 | November<br>2022 | December<br>2022 |
|-------------|---|-----------------|------------------|---------------|---------------|---------------|---------------|---------------|----------------|-------------------|-----------------|------------------|------------------|
| KWH So      | urce (000's) :  |                 |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 1.          | Steam Generation  | 375,345         | 343,300          | 374,626       | 314,657       | 614,365       | 479,078       | 376,303       | 388,051        | 315,069           | 324,010         | 407,549          | 346,979          |
| 2.          | Nuclear Generation  | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 3.          | Hydro Generation  | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 4.          | Solar Generation  | 4,457           | 5,828            | 8,922         | 9,104         | 11,396        | 13,669        | 11,716        | 11,325         | 10,079            | 8,631           | 5,250            | 3,039            |
| 5.          | Other Generation  | 8,654           | 3,739            | 3,479         | 6,556         | 5,552         | 12,602        | 14,527        | 12,403         | 2,557             | 2,857           | 6,193            | 17,881           |
| 6.          | Purchases through MISO  | 14,525          | 2,028            | 1,837         | 28,958        | (1,486)       | 28,358        | 75,034        | 61,089         | 97,256            | 21,235          | 4,196            | 55,150           |
| 7.          | Purchased Power other than MISO                                       | 40,494          | 43,250           | 36,254        | 38,096        | 34,959        | 32,428        | 25,449        | 25,572         | 22,920            | 30,399          | 38,760           | 42,668           |
| 8.          | Purchased Power for Other Systems                                     | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 9.          | Interchange Power-In  | 850,447         | 884,227          | 697,189       | 685,561       | 663,256       | 783,783       | 836,960       | 739,015        | 574,829           | 734,418         | 856,292          | 782,973          |
| 10.         | Interchange Power-Out   | 841,975         | 874,932          | 690,878       | 686,890       | 652,610       | 770,521       | 827,614       | 732,827        | 573,029           | 728,336         | 841,001          | 774,483          |
|             | Less:   |                 |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 11.         | Inter-System Sales through MISO                                       | 16,903          | 38,344           | 69,292        | 58,267        | 271,131       | 124,514       | 8,869         | 19,514         | 19,227            | 47,671          | 123,663          | 85,470           |
| 12.         | Inter-System Sales other than MISO                                    | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 13.         | Energy Losses and Company Use   | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 14.         | Retail - Back-Up Sales  | 12,492          | -                |               |               |               |               | -             | 1,729          | 25,302            |                 | -                | -                |
| 15.         | Supply (S)  | 422,552         | 369,096          | 362,137       | 337,775       | 404,301       | 454,883       | 503,506       | 483,385        | 405,152           | 345,543         | 353,576          | 388,737          |
| Fuel Cost   | t \$ (F) :  |                 |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 16.         | Steam Generation  | 9,927,442       | 9,286,587        | 9,346,930     | 8,180,330     | 15,497,751    | 12,857,616    | 11,279,186    | 11,814,696     | 10,381,041        | 9,169,432       | 12,541,137       | 10,496,966       |
| 17.         | Nuclear Generation  | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 18.         | Hydro Generation  | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 19.         | Excess Distributed Generation   | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 20.         | Other Generation  | 618,649         | 243,156          | 190,969       | 517,254       | 452,320       | 1,216,331     | 1,391,259     | 1,297,009      | 147,679           | 171,845         | 499,122          | 1,458,167        |
| 21.         | Purchases through MISO  | 982,048         | 161,815          | 193,647       | 1,985,464     | (96,761)      | 2,971,267     | 7,783,964     | 7,210,849      | 9,450,935         | 1,597,868       | 173,790          | 9,529,296        |
| 22.         | MISO Components of Cost of Fuel                                       | 189,226         | 407,215          | 603,882       | 920,612       | 1,314,334     | 1,407,653     | (149,045)     | 470,252        | 277,432           | 529,879         | 560,451          | 5,309,337        |
| 23.         | Purchased Power other than MISO<br>Less:                              | 2,316,941       | 1,562,304        | 2,024,224     | 2,211,767     | 1,923,092     | 1,737,751     | 1,070,346     | 801,575        | 1,249,460         | 2,298,904       | 2,296,690        | 2,061,353        |
| 24          | Inter-System Sales through MISO                                       | 619,285         | 1,040,562        | 1,637,072     | 1,379,511     | 6,384,133     | 3,041,197     | 223,657       | 568,841        | 474,457           | 1,168,190       | 4,209,681        | 2,843,203        |
| 24.<br>25.  | Inter-System Sales through MISO<br>Inter-System Sales other than MISO |                 | 1,040,562        |               | 1,379,511     | 0,384,133     |               | 223,637       |                | 4/4,45/           | 1,166,190       | 4,209,681        | 2,843,203        |
| 25.<br>26.  | Transmission Losses   | -               | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
|             |   | -               | -                | -             | -             | -             | -             | -             | 125 022        | -                 | -               | - (1.772)        | -                |
| 27.         | Retail - Back-up Sales  | 610,474         | -                | 1,408         | -             | -             | -             | -             | 135,023        | 2,072,136         | 257             | (1,773)          | -                |
| 28.         | Retail Portion of Coal Deferral Amortization                          |                 |                  |               |               |               |               |               |                |                   |                 |                  | -                |
| 29.         | Total Fuel Costs (F) :  | \$ 12,804,547   | \$ 10,620,515    | \$10,721,172  | \$ 12,435,916 | \$ 12,706,603 | \$ 17,149,421 | \$ 21,152,053 | \$ 20,890,517  | \$ 18,959,954     | \$ 12,599,481   | \$11,863,282     | \$ 26,011,916    |
| 30.         | F/S (Mills/KWH) :   | \$ 30.303       | \$ 28.774        | \$ 29.605     | \$ 36.817     | \$ 31.429     | \$ 37.701     | \$ 42.010     | \$ 43.217      | \$ 46.797         | \$ 36.463       | \$ 33.552        | \$ 66.914        |

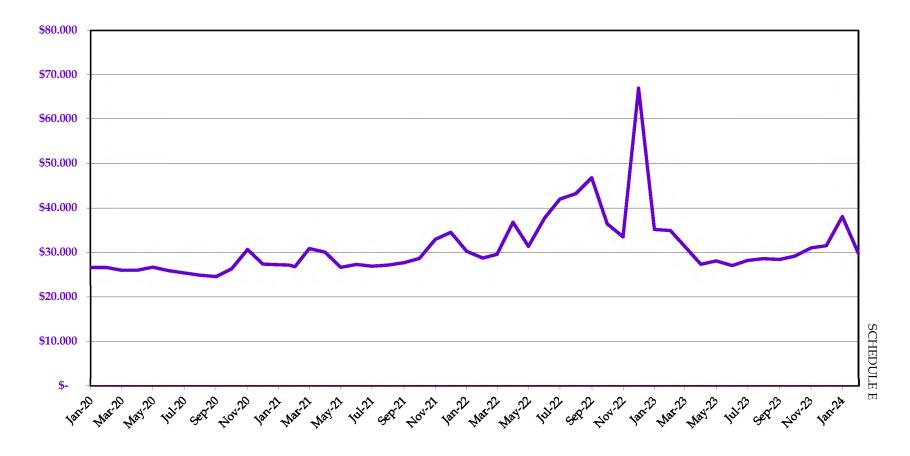
| Line<br>No. | Description   | January<br>2023  | February<br>2023 | March<br>2023 | April<br>2023 | May<br>2023   | June<br>2023  | July<br>2023  | August<br>2023 | September<br>2023 | October<br>2023 | November<br>2023 | December<br>2023 |
|-------------|---|------------------|------------------|---------------|---------------|---------------|---------------|---------------|----------------|-------------------|-----------------|------------------|------------------|
| KWH So      | urce (000's) :  |                  |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 1.          | Steam Generation  | 348,606          | 273,205          | 267,091       | 314,577       | 383,090       | 385,380       | 477,104       | 433,328        | 439,724           | 324,660         | 261,750          | 251,211          |
| 2.          | Nuclear Generation  | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 3.          | Hydro Generation  | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 4.          | Solar Generation  | 3,059            | 5,118            | 7,152         | 10,310        | 11,816        | 11,310        | 11,391        | 10,377         | 8,498             | 6,275           | 5,444            | 2,708            |
| 5.          | Other Generation  | 3,453            | 1,301            | 3,035         | 2,885         | 5,322         | 4,473         | 7,110         | 7,978          | 3,662             | 4,215           | 1,978            | 1,055            |
| 6.          | Purchases through MISO  | 29,711           | 27,839           | 57,735        | 29,310        | 9,847         | 18,710        | 12,065        | 33,668         | 11,961            | 54,362          | 43,370           | 68,420           |
| 7.          | Purchased Power other than MISO                                       | 36,676           | 34,951           | 43,846        | 37,818        | 22,971        | 25,429        | 23,536        | 25,265         | 19,046            | 29,430          | 41,191           | 37,724           |
| 8.          | Purchased Power for Other Systems                                     | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 9.          | Interchange Power-In  | 591 <i>,</i> 533 | 607,994          | 669,222       | 528,329       | 552,279       | 603,334       | 649,412       | 703,990        | 606,747           | 652,376         | 699,374          | 636,052          |
| 10.         | Interchange Power-Out   | 584,036          | 600,539          | 662,999       | 525,121       | 547,890       | 597,057       | 641,627       | 697,152        | 600,871           | 644,672         | 690,868          | 629,026          |
|             | Less:   |                  | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 11.         | Inter-System Sales through MISO                                       | 50,036           | 18,467           | 28,172        | 75,267        | 64,138        | 28,518        | 61,066        | 37,792         | 78,269            | 47,913          | 17,886           | 2,776            |
| 12.         | Inter-System Sales other than MISO                                    | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 13.         | Energy Losses and Company Use   | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 14.         | Retail - Back-Up Sales  | 48               |                  | 138           |               |               |               | -             |                | 2,437             | 75              | 813              | 1,646            |
| 15.         | Supply (S)  | 378,918          | 331,402          | 356,772       | 322,841       | 373,297       | 423,061       | 477,925       | 479,662        | 408,061           | 378,658         | 343,540          | 363,722          |
| Fuel Cos    | t \$ (F) :  |                  |                  |               |               |               |               |               |                |                   |                 |                  |                  |
| 16.         | Steam Generation  | 11,564,445       | 8,968,935        | 8,073,460     | 9,661,315     | 11,073,767    | 10,912,810    | 12,805,072    | 12,069,190     | 12,009,954        | 8,578,641       | 6,740,589        | 7,995,785        |
| 17.         | Nuclear Generation  | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 18.         | Hydro Generation  | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 19.         | Excess Distributed Generation   | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 20.         | Other Generation  | 688,799          | 19,096           | 121,444       | 133,694       | 348,389       | 190,593       | 302,540       | 359,998        | 147,948           | 153,596         | 89,767           | 14,682           |
| 21.         | Purchases through MISO  | 1,096,222        | 645,045          | 1,767,717     | (1,257,329)   | 228,904       | 283,927       | 464,300       | 1,041,155      | 312,334           | 1,730,215       | 1,392,585        | 1,900,397        |
| 22.         | MISO Components of Cost of Fuel                                       | (331,375)        | 50,115           | 92,573        | (119,190)     | (184,221)     | 73,280        | 252,748       | 196,500        | (7,928)           | 253,944         | 313,842          | 202,358          |
| 23.         | Purchased Power other than MISO<br>Less:                              | 1,848,108        | 2,541,571        | 2,067,059     | 2,496,996     | 680,946       | 700,151       | 1,054,961     | 1,040,196      | 1,097,691         | 1,560,339       | 2,589,191        | 1,473,753        |
| 24.         | Inter-System Sales through MISO                                       | 1,532,351        | 639,236          | 923,256       | 2,074,468     | 1,647,054     | 693,176       | 1,387,642     | 969,717        | 1,888,616         | 1,206,901       | 434,523          | 67,357           |
| 24.<br>25.  | Inter-System Sales through MISO<br>Inter-System Sales other than MISO | 1,532,351        | 639,236          |               | 2,074,468     | 1,047,054     | 693,176       | 1,387,842     | 909,/1/        | 1,888,616         | 1,206,901       | 434,523          | 67,357           |
| 25.<br>26.  | Transmission Losses   | -                | -                | -             | -             | -             | -             | -             | -              | -                 | -               | -                | -                |
| 20.         | Retail - Back-up Sales  | 2,159            | -                | 4,068         | -             | - 22          | -             | -             | -              | -<br>63,587       | -<br>4,662      | 26,408           | -<br>37,934.00   |
| 27.<br>28.  | Retail Portion of Coal Deferral Amortization                          | - 2,139          |                  | 4,000         | -             | -             | -             | -             | -              | -                 | 4,002           | - 20,400         | 37,934.00        |
| 29.         | Total Fuel Costs (F) :  | \$ 13,331,689    | \$ 11,585,526    | \$ 11,194,929 | \$ 8,841,018  | \$ 10,500,709 | \$ 11,467,585 | \$ 13,491,979 | \$ 13,737,322  | \$ 11,607,796     | \$ 11,065,172   | \$ 10,665,043    | \$ 11,481,684    |
| 30.         | F/S (Mills/KWH) :   | \$ 35.184        | \$ 34.959        | \$ 31.378     | \$ 27.385     | \$ 28.130     | \$ 27.106     | \$ 28.230     | \$ 28.640      | \$ 28.446         | \$ 29.222       | \$ 31.045        | \$ 31.567        |

| Line<br>No. | Description                                  | January<br>2024  | February<br>2024 |
|-------------|--|------------------|------------------|
|             | urce (000's) :                               | <br>             |                  |
| 1.          | Steam Generation                             | 213,776          | 121,436          |
| 2.          | Nuclear Generation                           | -                | -                |
| 3.          | Hydro Generation                             | -                | -                |
| 4.          | Solar Generation                             | 2,100            | 6,008            |
| 5.          | Other Generation                             | 9,820            | 1,276            |
| 6.          | Purchases through MISO                       | 151,618          | 171,910          |
| 7.          | Purchased Power other than MISO              | 41,559           | 36,684           |
| 8.          | Purchased Power for Other Systems            | -                | -                |
| 9.          | Interchange Power-In                         | 825,422          | 528,393          |
| 10.         | Interchange Power-Out                        | 815,805          | 522,996          |
|             | Less:  |                  | -                |
| 11.         | Inter-System Sales through MISO              | (238)            | (162)            |
| 12.         | Inter-System Sales other than MISO           | -                | -                |
| 13.         | Energy Losses and Company Use                | -                | -                |
| 14.         | Retail - Back-Up Sales                       | <br>3,638        | 685              |
| 15.         | Supply (S)                                   | <br>425,090      | 342,188          |
| Fuel Cos    | t \$ (F) :                                   |                  |                  |
| 16.         | Steam Generation                             | 5,964,529        | 3,620,670        |
| 17.         | Nuclear Generation                           | -                | -                |
| 18.         | Hydro Generation                             | -                | -                |
| 19.         | Excess Distributed Generation                | -                | -                |
| 20.         | Other Generation                             | 1,411,935        | 17,262           |
| 21.         | Purchases through MISO                       | 7,237,957        | 4,367,282        |
| 22.         | MISO Components of Cost of Fuel              | (382,555)        | 248,463          |
| 23.         | Purchased Power other than MISO              | 2,367,313        | 2,022,563        |
|             | Less:  |                  |                  |
| 24.         | Inter-System Sales through MISO              | (5,432)          | (3,911)          |
| 25.         | Inter-System Sales other than MISO           | -                | -                |
| 26.         | Transmission Losses                          | -                | -                |
| 27.         | Retail - Back-up Sales                       | 423,629          | 30,904           |
| 28.         | Retail Portion of Coal Deferral Amortization | <br>-            | -                |
| 29.         | Total Fuel Costs (F) :                       | \$<br>16,180,982 | \$ 10,249,247    |
| 30.         | F/S (Mills/KWH) :                            | \$<br>38.065     | \$ 29.952        |

## OFFICE OF UTILITY CONSUMER COUNSELOR REVIEW OF FUEL COST ADJUSTMENT

Southern Indiana Gas and Electric Company (CEI South) Cause No. 38708 FAC 143

Actual Cost (in mills) of Fuel



#### Comparison of Actual Fuel Cost and Estimated Fuel Cost for December 2023, January and February 2024

| Month         | Actual<br>Sales | Actual<br>Fuel Cost | Average<br>Actual<br>Fuel Cost | Forecast<br>Sales | Forecast<br>Fuel Cost | Average<br>Forecast<br>Fuel Cost | Weighted<br>Average Error |
|---------------|-----------------|---------------------|--------------------------------|-------------------|-----------------------|----------------------------------|---------------------------|
| December 2023 | 363,722         | \$ 11,481,684       | 31.567                         | 418,461           | \$ 13,295,027         | 31.771                           | (33.521)<br>39.195        |
| January 2024  | 425,091         | 16,180,982          | 38.065                         | 464,322           | 20,185,573            | 43.473                           |                           |
| February 2024 | 342,189         | 10,249,247          | 29.952                         | 410,931           | 17,226,436            | 41.921                           |                           |
|               |                 |                     |                                |                   |                       |                                  | 5.674                     |
| Total         | 1,131,002       | \$ 37,911,913       | \$ 33.521                      | 1,293,714         | \$ 50,707,036         | \$ 39.195                        | 16.93%                    |

Source: Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 5, Pages 1, 2 and 3 of 4

#### **Tracker History**

|                         | Requested & Approved Fuel Cost Adjustment Factor |               |             |            |                 |  |  |  |  |  |  |
|-------------------------|--|---------------|-------------|------------|-----------------|--|--|--|--|--|--|
|                         | Ādju   | sted for Indi | ana Utility | Receipts T | ax              |  |  |  |  |  |  |
|                         | RS,B, SGS,                                       |               |             |            | Total Special   |  |  |  |  |  |  |
| Cause No.               | OSS, SL, OL                                      | DGS           | LP          | HLF        | Contracts       |  |  |  |  |  |  |
| 38708-FAC143            | (6.061)  | (6.051)       | (5.717)     | (5.356)    | 33.392          |  |  |  |  |  |  |
| 38708-FAC142            | (3.056)  | (3.051)       | (2.832)     | (2.595)    | 33.879          |  |  |  |  |  |  |
| 38708-FAC141            | 1.953  | 1.962         | 2.027       | 2.107      | 37.577          |  |  |  |  |  |  |
| 38708-FAC140            | 6.895  | 8.220         | 7.515       | 7.335      | 35.923          |  |  |  |  |  |  |
| 38708-FAC139            | 3.237  | 3.240         | 3.294       | 3.358      | 30.183 Per OUCC |  |  |  |  |  |  |
| 38708-FAC139            | 12.693   | 12.691        | 12.495      | 12.291     | 30.183 Per CEI  |  |  |  |  |  |  |
| 38708-FAC138            | 1.434  | 1.441         | 1.561       | 1.692      | 27.609          |  |  |  |  |  |  |
| 38708-FAC137            | (0.348)  | (0.337)       | (0.185)     | (0.016)    | 27.293 Per OUCC |  |  |  |  |  |  |
| 38708-FAC137            | 9.160  | 9.169         | 9.069       | 8.970      | 27.293 Per CEI  |  |  |  |  |  |  |
| 38708-FAC136            | (4.041)  | (4.028)       | (3.770)     | (3.482)    | 28.381          |  |  |  |  |  |  |
| 38708-FAC135            | (3.384)  | (3.374)       | (3.136)     | (2.883)    | 29.950          |  |  |  |  |  |  |
| 38708-FAC134 (1)        | (5.039)  | (5.028)       | (4.782)     | (4.511)    | 29.082          |  |  |  |  |  |  |
| 38708-FAC134 <b>(2)</b> | (4.961)  | (4.951)       | (4.708)     | (4.442)    | 28.634          |  |  |  |  |  |  |
| 38708-FAC133            | (5.499)  | (5.493)       | (5.279)     | (5.044)    | 29.137          |  |  |  |  |  |  |
| 38708-FAC132            | (5.481)  | (5.474)       | (5.234)     | (4.971)    | 28.228          |  |  |  |  |  |  |
| 38708-FAC131            | (10.905)   | (10.894)      | (10.524)    | (10.126)   | 26.473          |  |  |  |  |  |  |
| 38708-FAC130            | (11.393)   | (11.382)      | (11.013)    | (10.612)   | 26.194          |  |  |  |  |  |  |
| 38708-FAC129            | (9.952)  | (9.944)       | (9.633)     | (9.291)    | 26.601          |  |  |  |  |  |  |
| 38708-FAC128            | (9.249)  | (9.240)       | (8.924)     | (8.579)    | 28.098          |  |  |  |  |  |  |
| 38708-FAC127            | (10.326)   | (10.315)      | (9.986)     | (9.632)    | 26.529          |  |  |  |  |  |  |
| 38708-FAC126            | (10.216)   | (10.205)      | (9.848)     | (9.459)    | 25.763          |  |  |  |  |  |  |
| 38708-FAC125            | (9.319)  | (9.311)       | (8.994)     | (8.647)    | 27.921          |  |  |  |  |  |  |
| 38708-FAC124            | (9.222)  | (9.212)       | (8.871)     | (8.504)    | 28.394          |  |  |  |  |  |  |
| 38708-FAC123            | (8.813)  | (8.805)       | (8.494)     | (8.158)    | 27.329          |  |  |  |  |  |  |
| 38708-FAC122            | (7.475)  | (7.467)       | (7.110)     | (6.726)    | 28.250          |  |  |  |  |  |  |
| 38708-FAC121            | (6.769)  | (6.761)       | (6.438)     | (6.087)    | 31.208          |  |  |  |  |  |  |
| 38708-FAC120            | (5.040)  | (5.034)       | (4.723)     | (4.387)    | 29.363          |  |  |  |  |  |  |

(1) Billing months of May and June

(2) Billing month of July

## MISO - COST FLOW THROUGH IN THIS FAC December 2023, January and February 2024

|               | In Purchased Power |    |              |    | tersystem |              |
|---------------|--------------------|----|--------------|----|-----------|--------------|
|               | Purchases          |    | MISO         |    | Sales     | Net          |
|               | Through            | Сс | Components   |    | hrough    | MISO         |
| Month         | MISO Cost          | С  | Cost of Fuel |    | MISO      | Cost         |
|               |                    |    |              |    |           |              |
| December 2023 | \$ 1,900,397       | \$ | 202,358      | \$ | 67,357    | \$ 2,035,398 |
| January 2024  | 7,237,957          |    | (382,555)    |    | (5,432)   | 6,860,834    |
| February 2024 | 4,367,282          |    | 248,463      |    | (3,911)   | 4,619,656    |
| Total         | \$13,505,636       | \$ | 68,266       | \$ | 58,014    | \$13,515,888 |

Source: Petitioner's Exhibit No. 2, Attachment BKA-2, Schedule 5, Pages 1-3

## **AFFIRMATION**

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

Buyon Sumul

Gregory T. Guerrettaz Indiana Office of Utility Consumer Counselor

June 20, 2024 Date

## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Indiana Office of Utility Consumer Counselor

Public's Exhibit No. 1 Pre-Filed Testimony of Gregory T. Guerrettaz, CPA has been served upon

the following counsel of record in the captioned proceeding by electronic service on June 21, 2024.

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Louraine they

Lorraine Hitz Deputy Consumer Counselor

### INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

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