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June 17, 2021  
**INDIANA UTILITY  
REGULATORY COMMISSION**

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

**IURC CAUSE NO. 45564**

**DIRECT TESTIMONY  
OF  
NELSON BACALAO  
PRINCIPAL CONSULTANT, SIEMENS PTI**

**ON**

**INTEGRATED RESOURCE PLAN PROCESS AND RESULTS**

**SPONSORING PETITIONER'S EXHIBIT NO. 6**

**ATTACHMENT NB-1**

**DIRECT TESTIMONY OF NELSON BACALAO**

1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. My name is Nelson Bacalao. My business address is 703 Detering St. Apt A Houston TX  
5 77007.

6

7 **Q. By whom are you employed and in what capacity?**

8 A. I am a Principal Consultant at Siemens PTI ("Siemens PTI").

9

10 **Q. On whose behalf are you submitting this direct testimony?**

11 A. I am submitting testimony on behalf of Southern Indiana Gas and Electric Company d/b/a  
12 CenterPoint Energy Indiana South ("Petitioner", "CenterPoint Indiana South", "CEI South",  
13 or" Company").

14

15 **Q. Have you previously testified before the Indiana Utility Regulatory Commission (the  
16 "Commission") or other public utility commission?**

17 A. Yes, I testified before the Puerto Rico Energy Bureau First and Second IRP, Cases No.  
18 CEPR-AP-2015-0002 and CEPR-AP-2018-0001, on behalf of the Puerto Rico Electric  
19 Power Authority ("PREPA").

20

21 **Q. What is the purpose of your testimony in this proceeding?**

22 A. The purpose of my testimony is to support CenterPoint Indiana South's 2019/2020  
23 Integrated Resource Plan ("2019/2020 IRP") process, as well as Petitioner's Generation  
24 Transition Plan, and address issues related to the cost estimates and assumptions  
25 associated with the new Combustion Turbines additions proposed in the Preferred  
26 Portfolio from the 2019/2020 IRP.

27

28 **Q. Please summarize your education and experience relevant to your testimony in this  
29 case.**

30 A. My relevant education and experience are discussed within my resume, a copy of which  
31 is attached as Petitioner's Exhibit No. 6, Attachment NB-1. I hold a Ph. D. in Electrical

1 Engineering from the University of British Columbia, Vancouver, BC, Canada, earned in  
2 1987. I hold a Master Engineering (Electrical) degree from Rensselaer Polytechnic  
3 Institute in Troy, NY, earned in 1980. I hold an Electrical Engineer degree from Universidad  
4 Simon Bolivar in Caracas, Venezuela, earned in 1979. I have been employed by Siemens  
5 PTI since January 2006. I am a Principal Consultant based in Houston and my  
6 professional experience covers technical and strategic consulting services to utilities,  
7 governments, regulators, independent project developers, and the financial community, in  
8 domestic as well as international assignments. My work has been centered on power  
9 system planning with emphasis on Integrated Resource Planning, integration of  
10 renewable generation and the impact on transmission and distribution systems.

11  
12 **Q. Please summarize the history of Siemens PTI and your consulting relationship with**  
13 **CenterPoint Indiana South.**

14 A. Siemens PTI is the consulting unit of Siemens Industry and has been in the power system  
15 consulting business since 1969 under the name of Power Technologies Inc. PTI became  
16 part of Siemens in January 2006. Siemens PTI's continued growth led to the acquisition  
17 of Pace Global Energy Services, to strengthen our capabilities in market analytics and  
18 general Energy Business Advisory. Siemens PTI provided support for Petitioner's  
19 2019/2020 IRP and continues to be engaged to provide testimony support. With Siemens  
20 PTI, I have provided consulting services to CenterPoint Energy Houston Electric<sup>1</sup> on the  
21 areas of interconnection studies and North American Electric Reliability Corporation  
22 ("NERC") Compliance (CIP-14).

23  
24 **Q. Please summarize Siemens PTI's role in the 2019/2020 CenterPoint IRP process.**

25 A. Siemens PTI contributed to Petitioner's 2019/2020 IRP process in several key areas. The  
26 main contribution was the management and development of the IRP modeling (including  
27 some input development), strategic consulting, participation in the stakeholder process,  
28 and scorecard development.

29  

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<sup>1</sup> CenterPoint Energy Houston Electric is a subsidiary of the same parent company (CenterPoint Energy, Inc.) as CenterPoint Indiana South.

1 **Q. Please describe Siemens PTI's recent experience and expertise in structuring and**  
2 **leading integrated resource planning for utilities such as CenterPoint Indiana**  
3 **South.**

4 A. Siemens PTI is a leading consultant for integrated resource planning, with extensive  
5 experience in structuring and facilitating IRPs for utilities throughout the United States and  
6 Caribbean. The following list represents a selection of recent clients that have engaged  
7 Siemens PTI to contribute to their IRP processes: Orlando Utilities Commission (FL),  
8 Peninsula Clean Energy (CA), East Bay Community Energy (CA), San Jose Clean Energy  
9 (CA), Clean Power Alliance of Southern California (CA), Clean Power San Francisco (CA),  
10 Memphis Light Gas and Water (TN), and other utilities and load servicing entities with  
11 whom we are under confidentiality agreements in Missouri and other states. Siemens PTI  
12 also assisted Petitioner in its 2014 and 2016 IRP processes and is currently assisting  
13 another Indiana electric utility with its IRP, currently in the stakeholder process.

14

15 **Q. What have you done in preparation to develop opinions regarding the 2019/2020**  
16 **IRP and CenterPoint Indiana South generation plan?**

17 A. I did not have a direct role in preparing the 2019/2020 IRP; hence, I am bringing my  
18 independent view of how the process was conducted. In order to conduct my review, I  
19 read the IRP reports, and reviewed the various stakeholders' filings and IRP workpapers.

20

21

22 **II. MODELING, GENERATION PLANNING, AND SCORECARD**

23

24 **Q. Have you reviewed the documentation filed by CenterPoint Indiana South on the**  
25 **IRP and the corresponding workpapers and models?**

26 A. Yes, I have. The volume of information is quite substantial, and I have sought to become  
27 familiar with the rationale used by CEI South to identify the Preferred Portfolio with the  
28 support of my colleagues .

29

30 **Q. Are you aware that the Preferred Portfolio (High Technology) includes the**  
31 **installation of two gas turbines rated 236 MW each?**

32 A. Yes, I am aware of that recommendation of the Preferred Portfolio and reviewed the  
33 reasons behind the recommendation.

1 **Q. Describe your view on the approach used in the IRP for selecting the Preferred**  
2 **Portfolio's two gas turbines.**

3 A. In its Order in Cause No. 45052, the Commission explained that long-term risk is an  
4 important factor to be considered in the context of generation proposals: "Because  
5 unwinding assured cost recovery should an asset become uneconomic is not a commonly  
6 employed regulatory option, it is prudent to ensure during the pre-approval process that  
7 we understand and consider the risk that customers could sometime in the future be  
8 saddled with an uneconomic investment." Cause No. 45052 Order, p. 20. Petitioner's  
9 Witness Steven C. Greenley further addresses this concept in his testimony. I would  
10 describe this as the risk of buyer's remorse: the risk that a decision is made today which  
11 the Company and stakeholders later regret. Thus, the analysis should provide the decision  
12 makers information on the performance that these decisions have under future states of  
13 the world and identify which decisions are most likely to perform best and minimize the  
14 chances of buyer's remorse or regret.

15  
16 The approach that Siemens PTI uses to analyze portfolios is to analyze in detail those  
17 portfolios that perform best across the relevant metrics and make a recommendation by  
18 identifying the portfolio that minimizes the risk. To achieve this, my approach is to review  
19 portfolio decisions and identify those that minimize the impact of having it wrong – the  
20 impact of an asset becoming "uneconomic" in the Commission's words. I sometimes call  
21 this identifying the risk and impact that a decision will later be regretted by the utility, and  
22 hence its customers and stakeholders. Based on my review of the analysis done by CEI  
23 South, I find it consistent with the approach above and I think the decision to build the two  
24 combustion turbines ("CTs") is consistent with the public convenience and necessity in  
25 part because it fulfills the Company's needs for capacity and peaking energy with  
26 generation resources that the Company and its stakeholders are unlikely to regret.

27

28 **Q. Can you please elaborate?**

29 A. We are entering a period of tremendous transition in the power generation industry. For  
30 decades, the industry has primarily relied upon fossil fuel for its generation resources,  
31 more specifically coal. In the recent past and over the coming years, much of that coal-  
32 fired generation will be retired as the industry transitions to portfolios consisting much  
33 more extensively of renewable resources. Our grid cannot switch entirely to renewable

1 resources, however, because renewables must be supported by dispatchable power. This  
2 is not simply because of the intermittency of renewables but also is a function of the  
3 contribution that they provide to support the system peak and the required reserves. In the  
4 wintertime, with shorter days, there will not be sunlight during the evening peak and even  
5 for summer, as more photovoltaic generation is added to the system, net peak displaces  
6 to the evening, reducing the contribution of the renewable. So, the challenge becomes  
7 identifying the proper mix of renewable resources and dispatchable resources.  
8 Dispatchable resources will be more susceptible to regret if gas prices rise; renewable  
9 resources will be more susceptible to regret if capacity prices rise. A portfolio that mitigates  
10 the risk and impact of regret is a portfolio that navigates well through these often-  
11 competing risks. Let's take one risk factor at a time and assess how this decision plays  
12 out for the Preferred Portfolio with the CTs<sup>2</sup>.

13  
14 **Q. How do the portfolios compare when considering the risk of gas price volatility?**

15 A. The CTs' role in a portfolio is to provide peaking power and reserves. The peaking power  
16 functionally refers to the dispatch of generation during those peak load hours when there  
17 is insufficient base load generation or renewables in the system to supply the load. This  
18 typically occurs in relatively few hours per year. The reserve functionality refers to  
19 standing-by to supply the load in case a generation outage occurs. This all means that the  
20 CTs, as opposed to other base load generation (e.g., the Combined Cycle generators or  
21 Steam Turbine generation), run and burn gas only for a few hours during the year and  
22 hence are much less affected by gas price fluctuations. In the specific case of the  
23 Preferred Portfolio, the CTs have a very low capacity factor<sup>3</sup>, an average of approximately  
24 3% for the planning period for Reference Case conditions, which is much lower than those  
25 typical for base load generation (60% or higher). Another way of seeing this is considering  
26 that the cost of fuel for peakers typically represents about 2% of the net present value of  
27 the revenue requirements ("NPVRR"), thus the gas price may double and only have an  
28 effect of 2% increase in the NPVRR.

29  

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<sup>2</sup> These are the other portfolios that had the lower net present value of the revenue requirement ("NPVRR") and performed well across a wide range of factors: Reference Case, Renewable + Flexible Gas, and Renewable 2030 (See Figure 8-8 of the 2019/2020 IRP Volume 1 pg. 251).

<sup>3</sup> Capacity Factor = Energy Produced / (Installed Capacity x hours of the year).

1 Another aspect to consider is that CTs can be turned on and off with great flexibility which  
2 makes them a good companion to intermittent renewables. In contrast, steam gas  
3 generation as would be the case of a converted A.B. Brown to gas is much less flexible  
4 and can be locked to run at minimum levels as it cannot be turned off and on as frequently.  
5 As a reference, the table below shows the NPVRR of the ABB1 + ABB 2 Gas Conversion  
6 scenario under reference condition and the present value of the fuel cost for the converted  
7 ABB1 and ABB2 and we see that represents 3.5% of the NPVRR. On the other hand, for  
8 the Preferred Portfolio (i.e., the High Technology Portfolio), the present value of the fuel  
9 costs represents 2%, 44% less. We also note in this table that with the exception of the  
10 Renewable 2030 Portfolio that stops using gas by 2030, the fuel cost of the Preferred  
11 Portfolio as a percentage of their NPVRR is the lowest among the least cost portfolios.

**Table 1**

	NPVRR M\$	NPV NG Costs for Peaking Units M\$	NG Cost as % NPVRR
Bridge ABB1 + ABB2	\$2,887	\$101.92	3.5%
Preferred Portfolio – High Technology	\$2,679	\$52.76	2.0%
Renewables 2030	\$2,678	\$37.78	1.4%
Reference Case	\$2,616	\$65.47	2.5%
Renewables + Flexible Gas	\$2,600	\$55.95	2.2%

12 **Q. How does the risk of higher capacity prices affect the portfolios?**

13 A. As I explained previously, those portfolios that are more reliant on dispatchable power  
14 face a higher risk from gas price volatility; however, those portfolios more reliant on  
15 renewable resources will face a higher risk from capacity price volatility. CenterPoint  
16 Indiana South as a Midcontinent Independent System Operator (“MISO”) member must  
17 meet the MISO Planning Reserve Margin Requirement (“PRMR”). In the IRP, a Planning  
18 Reserve Margin based on Unforced Capacity (“UCAP PRMR”) requirement of 8.9% of the  
19 coincident peak load<sup>4</sup> was used, which is in line with MISO’s requirements<sup>5</sup> and must be  
20 met by the capacity contributions of the resources in the portfolio or by market capacity  
21 purchases. Each of the resources owned or contracted by CenterPoint Indiana South

<sup>4</sup> This is CenterPoint Indiana South’s load at the time of MISO’s system wide peak.

<sup>5</sup> 2019/2020 IRP Volume 1, pg. 160 and MISO’s Planning Year 2020-2021 Loss of Load Expectation Study Report.

1 contributes to meet the PRMR requirement and gas generators like the CTs contribute  
2 between 90% to 95% of its installed capacity to meet it<sup>6</sup>. Any shortfall must be procured  
3 in MISO's Capacity Auction, whose prices can be very volatile and difficult to predict as  
4 they depend on a tight balance between offer and supply. This can be observed by noting  
5 the widespread in the forecast as shown Figure 7-7 of the IRP Volume 1 and reproduced  
6 below, where we see that the high forecast is more than double the low forecast and gets  
7 close the MISO's ceiling equal to the cost of a new entry ("CONE") to provide the reserves  
8 (\$257 MW/day).

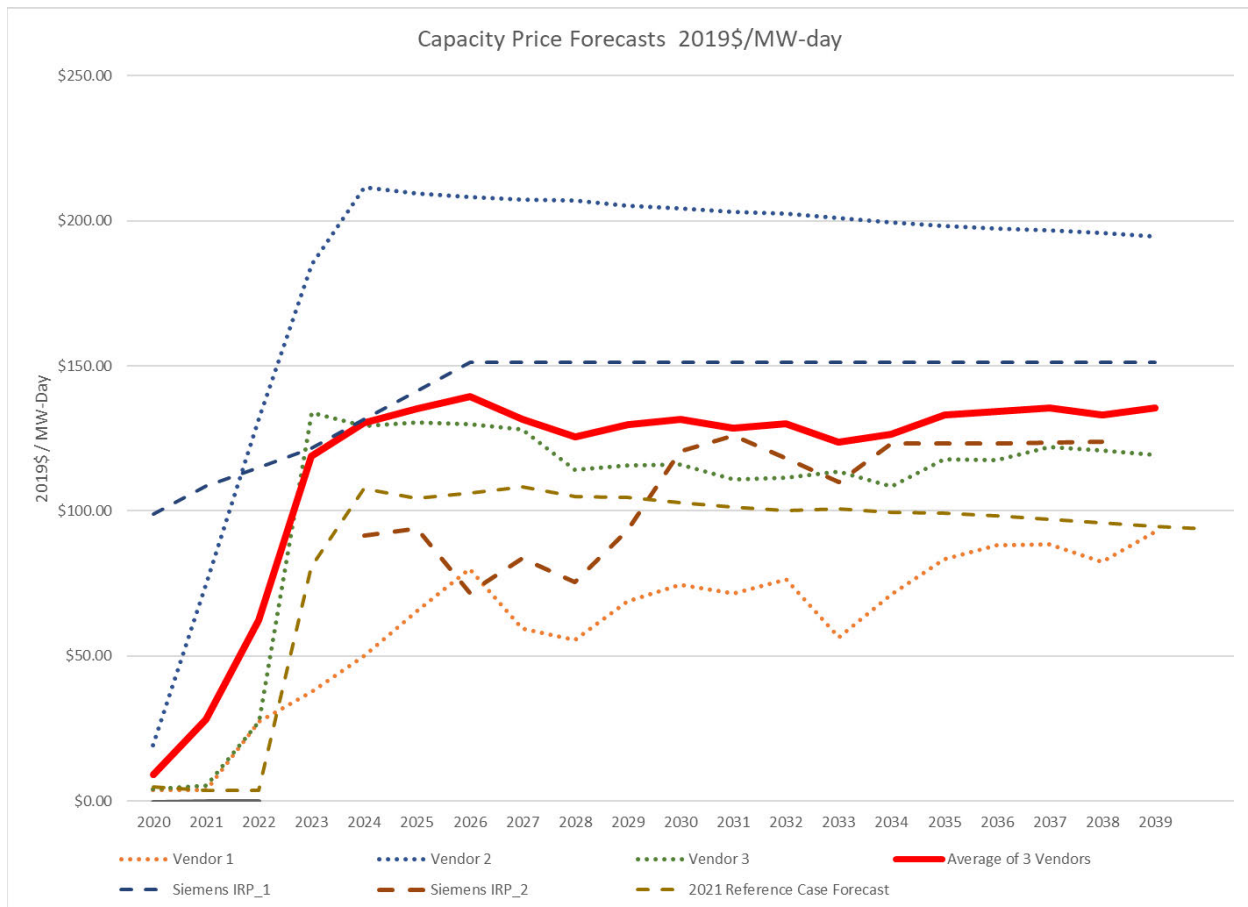
9  
10 Another aspect to consider is that in the below while the forecast for Vendor 1, which is  
11 PACE (a Siemens Company at the time), is the lowest, forecasts change as vendors have  
12 more information and consider the situations of the companies that will have to go to  
13 market to secure capacity (either spot or bilateral). In the figure I also added Siemens  
14 current Reference Capacity Forecast for MISO and the capacity forecast used for two  
15 IRPs in MISO that considered the particularities of the utilities. As noted, all updated  
16 forecasts are above those of Vendor 1 (PACE).

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<sup>6</sup> Table 8-6 of CEI South IRP Volume 1, pg. 249.



Figure 1



1 Moreover, there are various risk factors that seem to indicate the potential for higher  
 2 prices. The Local Resource Zone (“LRZ”) 6, where CenterPoint Indiana South is located,  
 3 does not have enough local resources to meet its Local Reliability Requirements (“LRR”)  
 4 and is dependent on imports from other MISO LRZs<sup>7</sup>. This makes Zone 6 dependent on  
 5 the generation surplus in other zones, that may or may not materialize, adding practical  
 6 deliverability risks and price risks. The capacity shortfall in MISO and specifically in Zone  
 7 6 is only expected to grow in the coming years, as noted in Petitioner’s Witness F. Shane  
 8 Bradford’s testimony.  
 9

<sup>7</sup> Figure 5.9 of 2019/2020 IRP Volume 1 pg. 144 and Table 6-1 to 6-3 of MISO’s Planning Year 2020-2021 Loss of Load Expectation Study Report.

1 The more heavily reliant a portfolio is on renewable resources, the greater the exposure  
2 to capacity price volatility risk. As more solar generation enters the market, the system  
3 resource adequacy determinations are likely to evolve from summer peaking to  
4 summer/winter peaking or a four seasonal construct as currently considered by MISO<sup>8</sup>.  
5 As I noted previously, there is a significant difference in the contribution of solar generation  
6 to meet the summer peak versus the winter peak. This is largely a function of the shorter  
7 days and the occurrence of the peak after dark. In the summer, much of the evening peak  
8 occurs while the sun is still shining; in winter, the evening peak occurs after dark.  
9 Additionally, as solar generation penetration increases, the summer peak contribution is  
10 also affected. As more renewable enter the system, the peak of the net load<sup>9</sup>, which  
11 accounts for the reduction of renewable generation, displaces to later in the day when  
12 renewable resources also contribute less. This effect is captured in the industry with what  
13 is called the Effective Load Carrying Capability (“ELCC”), which is a measure of how much  
14 a resource can be depended on to supply the peak. For fossil fuel generation, this value  
15 is quite high — typically over 90% of the installed capacity; for solar it is currently 50% in  
16 MISO of the installed capacity for summer, and it reduces to only 5% for winter, as  
17 explained above. Both values for solar will reduce further as penetration increases. For  
18 wind generation, the ELCC is more uniform during the year and in the order of 15% for  
19 summer, spring, and fall, and 20% for winter.

20  
21 As can be appreciated, as more and more fossil fuel generation retires and is replaced  
22 with renewables, the need for dispatchable power becomes more pronounced. A construct  
23 requiring meeting a winter PRMR requirement would have very low contribution of solar  
24 and would have to be met with thermal resources, wind resources, and storage<sup>10</sup>. As we  
25 have more and more solar penetration into the overall grid portfolio, this will drive up the  
26 cost of capacity in the market. The more reliant a portfolio is on renewables, the more it  
27 will rely on capacity purchases. If capacity prices rise more than forecasted, it increases  
28 the risk that a particular decision will be regretted.

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<sup>8</sup> RAN Reliability Requirements and Sub-annual Construct (misoenergy.org):  
[https://cdn.misoenergy.org/20210203%20RASC%20Item%2004a%20Subannual%20Construct%20Presentation%20\(RASC010,%20011,%20012\)517859.pdf](https://cdn.misoenergy.org/20210203%20RASC%20Item%2004a%20Subannual%20Construct%20Presentation%20(RASC010,%20011,%20012)517859.pdf).

<sup>9</sup> The net load is the effective load of the system accounting for the effects of the renewable generation output.

<sup>10</sup> See Figure 8-6 and 8-7 of the 2019/2020 IRP Volume 1 pg. 249 for ELCC of thermal, wind and solar and its projections.

1  
2 The Preferred Portfolio with the two CTs is much less susceptible to the impact on changes  
3 in capacity prices as it has the lowest forecasted amount of capacity purchases of the four  
4 least cost portfolios<sup>11</sup> and hence it has the lowest exposure to this risk. The table below  
5 shows for the four least cost portfolios and for the case where A.B. Brown is converted to  
6 gas, the average market capacity purchases, the present value of the associated cost and  
7 how much it represents as a percentage of the Net Present Value for the portfolio revenue  
8 requirements ("NPVRR"). We observe that the Renewable 2030 has the greatest  
9 exposure followed by the Reference Case and Renewable + Flexible Gas, A.B. Brown  
10 Conversion (Bridge ABB1 + ABB2) and the preferred portfolio (High Technology) has the  
11 least exposure.

**Table 2**

Scenario	Average Capacity Purchases (2020-2039) MW	NPV of Cost M\$	% NPVRR
Bridge ABB1 + ABB2	207	50.97	1.8%
Renewables 2030	152	62.05	2.3%
Reference Case	124	46.12	1.8%
Renewables + Flexible Gas	121	45.43	1.7%
Preferred Portfolio- High Technology	33	2.97	0.1%

12  
13 Another aspect to consider is that the ELCC of storage declines as penetration increases<sup>12</sup>  
14 and the Preferred Portfolio would be only marginally affected by a reduction of ELCC of  
15 storage as it only has 50 MW installed in 2039, which is not the case for the Renewable

<sup>11</sup> Renewable + Flexible Gas

<sup>12</sup> Storage was conservatively modeled in the IRP with a constant ELCC of 95%, however this value is likely to decline as more storage is added to system. For example, on a recent study for NY we are using 75% for a 4 hours battery as recommended by NYSO for penetrations greater than 1000 MW (see Expanding Cap. Eligibility: <https://www.nyiso.com/documents/20142/5375692/Expanding%20Capacity%20Eligibility%20030719.pdf/19c4ea0d-4827-2e7e-3c32-cf7e36e6e34a>) and in an study for CAISO a value as low as 54% was identified for high levels of storage penetration (see Energy Storage Capacity Value on the CAISO System: <https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/ElectPowerProcurementGeneration/irp/2018/2019-20%20IRP%20Astrape%20Battery%20ELCC%20Analysis.pdf>).

1 2030 that has 360 MW of storage by 2031. Simply put, as the level of storage increases  
2 in the MISO Market, the level of accredited capacity would go down. It is the same  
3 phenomenon discussed regarding solar resources. This risk was not considered within the  
4 IRP but is an important factor to consider when evaluating a portfolio that relies heavily on  
5 storage.  
6

7 **Q. What conclusions do you derive from the above?**

8 A. I conclude that the Preferred Portfolio with two CTs has very low exposure to the risk of  
9 high fuel prices while providing almost full protection to the risk of high capacity prices.  
10 The Preferred Portfolio has nearly the least exposure when considering gas price risk,  
11 with only Renewables 2030 being less exposed. On the capacity side, the Preferred  
12 Portfolio has the lowest risk of exposure and by a large margin. Notably, the Renewables  
13 2030 is most exposed on the capacity side. The Preferred Portfolio navigates these two  
14 competing variables very well and better than the other portfolios. In other words,  
15 compared to other portfolios, the effects of being wrong and regretting the decision are  
16 less pronounced.  
17

18 **Q. How does the possibility of battery storage affect the analysis?**

19 A. Storage is a useful tool that can help address solar's inherent incapability to meet the  
20 system peaks and shift energy to those times when the sun is not shining. To address  
21 whether battery storage would have been a more economical solution than constructing  
22 two CTs, CenterPoint Indiana South conducted a sensitivity analysis where the CTs were  
23 replaced by storage that would provide similar amounts of reserve as the CTs. The storage  
24 was selected from a bid received on the All source RFP<sup>13</sup> and consisted of eight modules  
25 with 76.2 MW of three-hour storage each, totaling 609.6 MW. With expected ELCC of  
26 71%, the resulting capacity value of 434.3 MW is slightly higher than the capacity value of  
27 the two CTs (409 MW).  
28

29 **Q. Have you reviewed that sensitivity analysis?**

30 A. Yes. I reviewed the sensitivity calculations and identified that the building storage resulted  
31 in an increase of 5% on the NPVRR of the portfolio. This was driven by the higher capital  
32 and fixed O&M costs of the storage that are approximately 54% higher than corresponding

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<sup>13</sup> See Section 6.1.1 of the 2019/2020 IRP Volume 1 pg. 149.

1 costs of the CTs and result in an 17% increase in the overall capital and fixed O&M costs  
2 component of the NPVRR. This increase in cost is partly compensated by a reduction in  
3 fuel costs (5% reduction) and emissions cost (2% reduction).  
4

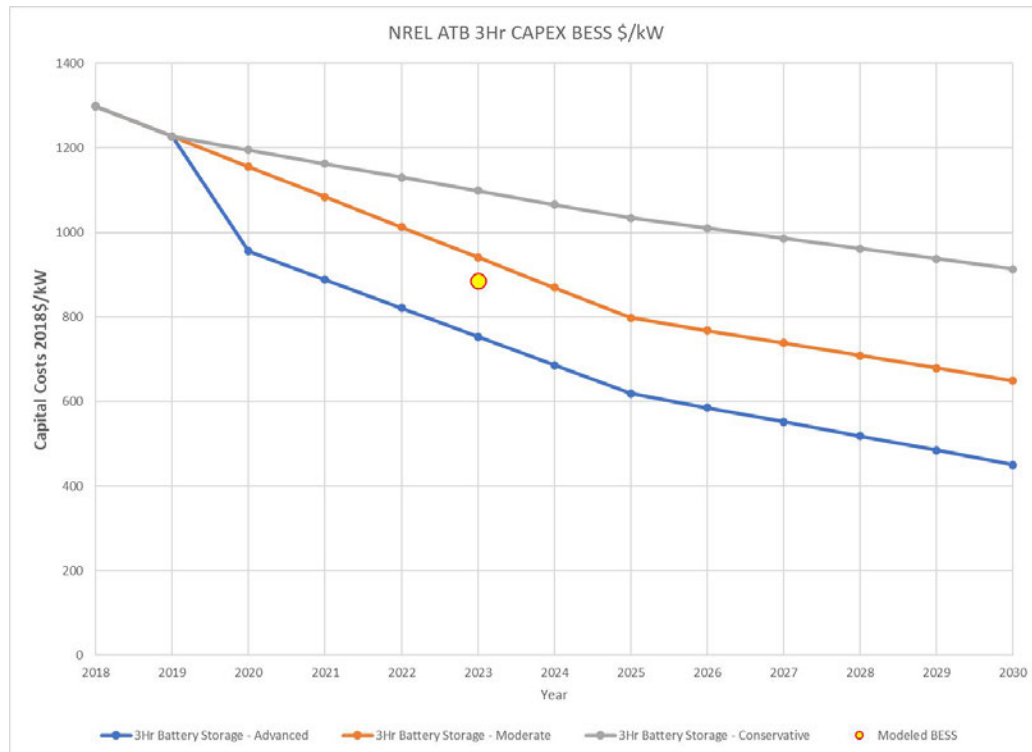
5 **Q. Are the prices for storage assumed in CenterPoint Indiana South's sensitivity**  
6 **analysis reasonable?**

7 A. Yes. First, these are actual prices that were submitted in response to an actual RFP. But  
8 given the importance of the Storage PPA costs in driving the results above, I further  
9 compared this cost with the 2020 NREL's ATB forecast<sup>14</sup>. To get a comparable capital  
10 cost in \$/kW, I subtracted from the PPA yearly payments the expected component for  
11 Fixed O&M costs (using the ATB forecast) and then determined the implied capital using  
12 the same discount rate used in the IRP with a 15 year life. I further considered that  
13 CenterPoint Indiana South would have to enter this contract approximately two years  
14 ahead of the in-service date of the project (i.e., 2023). The figure below shows the result  
15 of the analysis where we note that the cost is below the expected trend (Moderate) and  
16 somewhat higher than the minimum expected costs (Advanced), thus confirming the  
17 adequacy of the values used in Petitioner's 2019/2020 IRP. In short, I agree with the  
18 conclusion that additional storage will be more costly than the two CTs and attempting to  
19 replace one or both CTs with storage would be an uneconomic decision.

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<sup>14</sup> <https://atb.nrel.gov/electricity/2020/data.php>.

Figure 2



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**Q. Are there other issues that should be considered besides economics when evaluating storage as a potential alternative?**

A. Yes. As discussed earlier, the ELCC of storage may not be constant over time and as the penetration increases, it could decrease and possibly significantly as identified in the California Independent System Operator (CALISO) study and in the New York Independent System Operator (NYISO) studies (see footnote 12 *supra*). Moreover, the storage considered was three hours duration and any real-life requirement with longer duration requirements could not be met. This is not the case with the CTs that can be in service for extended periods of time.

In summary, I think that the selection of battery energy storage in lieu of the CTs is not a robust solution and there is greater risk that it will result in higher costs and reduced services to CEI South's customers.

1 I think this summarizes well why I am of the opinion that CenterPoint Indiana South's  
2 decision to build the two CTs is a prudent decision for CenterPoint Indiana South and its  
3 customers and is in the public interest.  
4

5 **Q. Can you describe the Balanced Scorecard Methodology used in CenterPoint**  
6 **Indiana South's IRP?**

7 A. The Balanced Scorecard is a method to present the results of an otherwise complex  
8 analysis effectively and concisely. Across the top are the key objectives to be assessed  
9 and this includes affordability typically measured by the NPVRR; environmental factors for  
10 example CO<sub>2</sub> emissions minimization; and risk factors such as risk of the NPVRR being  
11 higher than expected, or overreliance on an energy and capacity market that can be  
12 volatile. There can be other factors in the Balanced Scorecard, and I understand that the  
13 factors used by CenterPoint Indiana South were vetted via an extensive stakeholder  
14 process.  
15

16 In the scorecard, each line contains the results for different portfolios allowing comparison.  
17

18 The scorecard can be based on deterministic results, but in most advanced procedures  
19 the results of the Monte Carlo stochastic simulations are used. This was the case in  
20 CenterPoint Indiana South's IRP, which allowed, for example, to show the cost uncertainty  
21 by looking at the 95<sup>th</sup> percentile (i.e., the cost or value that would be exceeded only 5% of  
22 the time) across 200 iterations<sup>15</sup>.  
23

24 I have used the Balanced Scorecard in multiple assessments and in my opinion, it is a  
25 powerful tool to visualize the performance of multiple portfolios at a glance. The scorecard  
26 typically uses shades of the color green to depict favorable outcome and by inspection it  
27 is relatively easy to identify the best performing portfolios, allowing the identification of  
28 what is sometimes called the decision set, i.e., those portfolios that behave best in  
29 comparison with the rest and are likely to contain the preferred portfolio and should be

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<sup>15</sup> The 95<sup>th</sup> percentile is the value that is exceeded only 5% of the time and the greater the difference of this value to the mean is indication of the sensitivity of the portfolio to one or more uncertainties. CenterPoint Indiana South considered the following variable uncertain (stochastics); Load (energy and peak), natural gas (high uncertainty variable), coal, CO<sub>2</sub> emissions costs, capital costs for solar, wind, BESS, CCGTs and CTs.

1 studied closely<sup>16</sup>. In the case of CenterPoint Indiana South's IRP, the Reference Case,  
2 the Renewable + Flexible Gas, the Renewable 2030 and the High Technology are clearly  
3 members of this decision set<sup>17</sup>.

4  
5 **Q. Is the Monte Carlo 95<sup>th</sup> percentile approach the only way that cost risk can be**  
6 **analyzed?**

7 A. No, there are other ways and I also looked at them to conclude that CenterPoint Indiana  
8 South's proposal to build the two CTs is prudent.

9  
10 First, I look at how the different Portfolios NPVRR changes when subjected to different  
11 "states of the world" as described in the Scenarios that CenterPoint Indiana South  
12 considered<sup>18</sup>. For each of those scenarios, there is always a Portfolio that performs best  
13 (i.e., has the lowest NPVRR and performed well across other metrics) and would be the  
14 preferred decision if we had perfect foresight; this is sometimes called the No-Regret  
15 Portfolio for the given state of the world. Then I compare the other Portfolios under this  
16 state of the world (or future) and assess the difference with respect of the No Regret  
17 Portfolio and the difference is the degree of "Regret". With this approach we can factor the  
18 degree that different Portfolios benefit from a favorable outcome (e.g., a portfolio that could  
19 benefit more from a reduction in capital costs of renewable and storage than others)<sup>19</sup> and  
20 by how much they are shielded from adverse outcomes.

21  
22 Using the results reported in in the IRP, I determined the Regret as defined above and  
23 calculated the simple average of the regret across the scenarios considered. Below I show  
24 the results of this assessment. This is a simple average of the deltas from the lowest  
25 NPVRR under the five different scenarios evaluated in the IRP. In other words, this  
26 analysis is focused purely on NPVRR, and each of the various scenarios are equally rated.

---

<sup>16</sup> See for example the MLGW IRP ([http://www.mlgw.com/images/content/files/pdf/MLGW-IRP-Final-Report\\_Siemens-PTI\\_R108-20.pdf](http://www.mlgw.com/images/content/files/pdf/MLGW-IRP-Final-Report_Siemens-PTI_R108-20.pdf)) Exhibit 10 and subsequent analysis of Portfolios 5, 9 and 10 together with the TVA option that were included in the decision set.

<sup>17</sup> Figure 8-8 of Volume I of the 2019/2020 IRP.

<sup>18</sup> See Figure 2.5 of the 2019/2020 IRP pg. 94.

<sup>19</sup> The convenience of assessing the upside of Portfolios was also expressed in the Director's report where it indicates that "[CenterPoint Indiana South] uses the 95th percentile as the metric for cost uncertainty. This is reasonable but it ignores the uncertainty around the potential for lower-than-expected cost. It is possible that a portfolio has more downside cost benefit than other portfolios, but this was not considered by [CenterPoint Indiana South]."



1 For example, it assumes the risk of the "Low Regulation" scenario is the same as the risk  
2 of the "High Regulation." We see below that Renewable + Flexible Gas has the lowest  
3 average regret, i.e., the chances of regretting the decision under an adverse future are  
4 lower. This Portfolio is followed by the Reference and then the Renewable 2030 and High  
5 Tech (Preferred Portfolio) that are very close.

**Table 3**  
**Regret assessment \$000**

Portfolio	Base Case	80% CO2 Reduction by 2050	High Technology	High Regulation	Low Regulation	Avg of Regret	Rank
P08 Renewables + Peak Gas	\$ -	\$ -	\$ -	\$ 123,706	\$ 54,284	\$ 35,598	1
Reference	\$ 13,616	\$ 26,834	\$ 29,121	\$ 191,970	\$ -	\$ 52,308	2
P09 Renewables 2030	\$ 78,052	\$ 55,902	\$ 180,539	\$ -	\$ 239,400	\$ 110,779	3
P10 - High Tech Portfolio	\$ 85,673	\$ 76,146	\$ 64,432	\$ 272,291	\$ 69,030	\$ 113,515	4
P04 Bridge ABB1	\$ 126,615	\$ 119,854	\$ 148,333	\$ 264,141	\$ 121,692	\$ 156,127	5
P06 Diverse Small CCGT	\$ 162,751	\$ 108,325	\$ 140,662	\$ 290,895	\$ 140,938	\$ 168,714	6
P02 - Bridge BAU- 2029	\$ 234,682	\$ 177,416	\$ 254,987	\$ 367,092	\$ 25,078	\$ 211,851	7
P03 Bridge ABB1 CCGT	\$ 354,435	\$ 291,880	\$ 335,363	\$ 463,461	\$ 338,444	\$ 356,717	9
P05 Bridge ABB1 & ABB2	\$ 287,200	\$ 260,647	\$ 298,705	\$ 393,455	\$ 268,644	\$ 301,730	8
P01 BAU	\$ 540,376	\$ 430,441	\$ 579,651	\$ 653,076	\$ 32,426	\$ 447,194	10

6 **Q. This analysis would seem to suggest the Renewable + Flexible Gas would have the**  
7 **least adverse impact if the decision were later regretted under this simple analysis.**

8 **Is that the correct reading?**

9 **A.** Yes, but with a qualification. Looking into this I noted that except for the Renewable 2030,  
10 all the Portfolios had a 236 MW CT built in 2024 and the Renewable + Flexible Gas had  
11 another built in 2033 versus the Preferred Portfolio that had it built together with the first  
12 unit. Thus, the option to delay the construction of the second turbine to 2033 in accordance  
13 with the Renewable + Flexible Gas should be considered. I investigated this and realized  
14 that first there are important construction efficiencies in building the two CTs together. As  
15 shown in Attachment 1.2 of Appendix 2 of the 2019/2020 IRP Volume 2, the cost of  
16 building the first unit (F Class Frame CT) is estimated to be in 2019\$, \$173 million and the  
17 cost of the second unit would be \$121 million if they are developed at the same time, thus  
18 the construction efficiencies translate into \$52 million savings. When I reviewed how the  
19 second unit was modeled, I noted that in both Portfolios, the fixed costs that include the  
20 capital recovery (amortization) were about the same, in fact the fixed cost for the second

1 unit in the Renewable + Flexible Gas Portfolio was 98% of the cost for the same unit in  
2 the Preferred Portfolio. However, if the second unit were to be built later, these  
3 construction efficiencies would not be realized and the difference between the portfolios  
4 would be smaller. This benefit from construction efficiencies is not reflected in the table  
5 above. This difference alone, if included in the above analysis, would reduce the  
6 differences between the Preferred Portfolio and the Renewable + Flexible Gas to about  
7 1.5%. Another aspect that would reduce the difference between the Portfolios is that  
8 Renewable + Flexible Gas Portfolio supplies a smaller load as it has 1% Energy Efficiency  
9 2024 – 2026 compared with the High Technology (0.75%) and that it includes the  
10 retirement of F.B. Culley 3 in 2033 – 2034. If these additional factors were included in the  
11 High Technology case, the difference would be smaller and in the order of 1%.

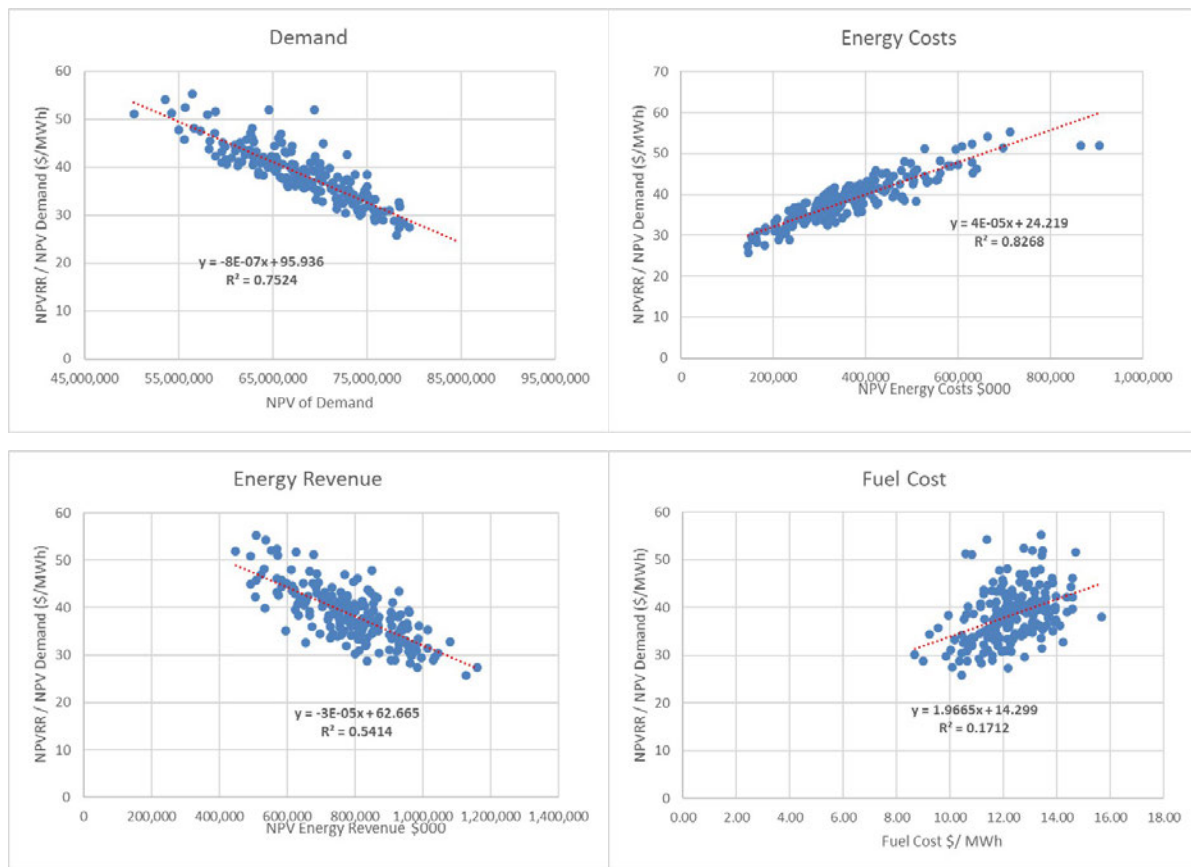
12  
13 Building simultaneously the two turbines also minimizes the market capacity risks that as  
14 I elaborated earlier are substantial. It minimizes disturbance on the system as there would  
15 major work being carried out at A.B. Brown once, and it preserves the interconnection  
16 rights that CenterPoint Indiana South has at A.B. Brown. As I noted previously, the simple  
17 averaging I have presented assumes the risk of all different scenarios is equal. I will  
18 demonstrate some of these differences later in my testimony.

19  
20 **Q. Are there other approaches to evaluating the impact of the risk of choosing the**  
21 **wrong portfolio?**

22 A. Yes. Another approach that I find useful is to identify the variables that most affect a  
23 Portfolio by reviewing the results of the Monte Carlo analysis. In this case, I look at how  
24 the average cost of the Portfolio under analysis changes as a function of uncertain  
25 variables. The Average Cost is determined by dividing the NPVRR by the NPV of the  
26 energy demand. I did this for the Preferred Portfolio and found that there is a clear  
27 correlation with the demand; higher demand to allocate the same fixed costs results in  
28 lower average costs per MWh, see first graph below that has on the X-axis the NPV of the  
29 Demand and the Y-axis the Average Cost. Also, there is a clear correlation with the Energy  
30 Cost (second graph) and with the Market Sales (third graph), as the first drives up the  
31 average cost up and second being an income rather than a cost. drives the average cost  
32 down. However, we note that changes in the fuel costs (\$/MWh of NPV of Demand) are  
33 only weakly associated with changes in the Average Cost as can be noted in the fourth

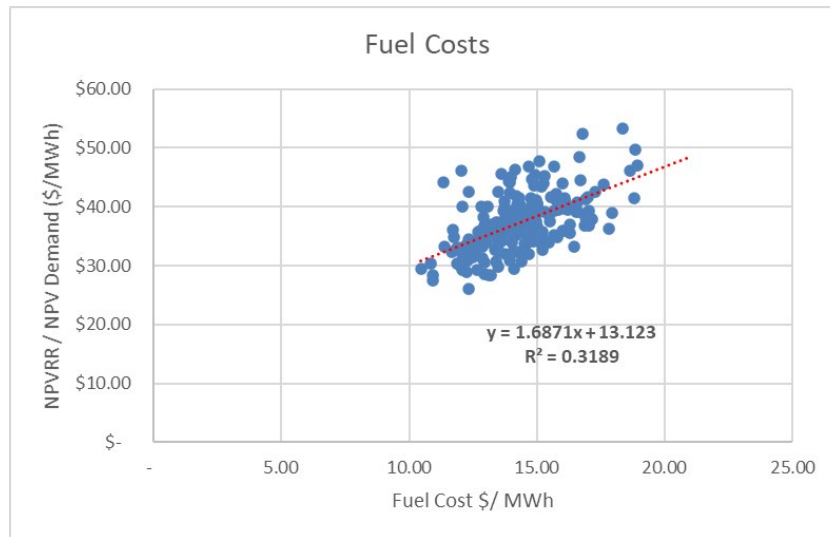
1 graph where we see a “blob” rather than a trend and we note the low  $R^2$  (0.17) hence  
 2 changes in fuel cost is not a significant risk for this Portfolio. I touched on this issue  
 3 previously, when I evaluated the percentage of the NPVRR that was represented by fuel  
 4 costs. But this analysis shows that the relatively limited risk of gas price volatility is fairly  
 5 static: it correlates weakly with the portfolio costs.

Figure 3



6 To further illustrate this, I did the same exercise for the Portfolio where case where there  
 7 is a small CCGT (433 MW) by 2026. This portfolio was expected to be still weakly  
 8 correlated with the fuel prices but to a greater degree than the preferred portfolio as it has  
 9 more fuel assets and this is shown in the figure below where we note an  $R^2$  of 0.32, almost  
 10 double that of the Preferred Scenario. So, for this gas conversion option, the risk of gas  
 11 price is more closely correlated to the portfolio's average costs than the Preferred Portfolio  
 12 and hence gas volatility has much greater impact.

Figure 4



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**Q. Are there other aspects that you would like to highlight about the decision to build the two CTs?**

A. Yes, I find that the decision to build the two CTs adds flexibility to CenterPoint Indiana South's generation assets to deal with uncertainties that can affect demand growth or the future development of the CenterPoint Indiana South's and MISO's generation portfolio.

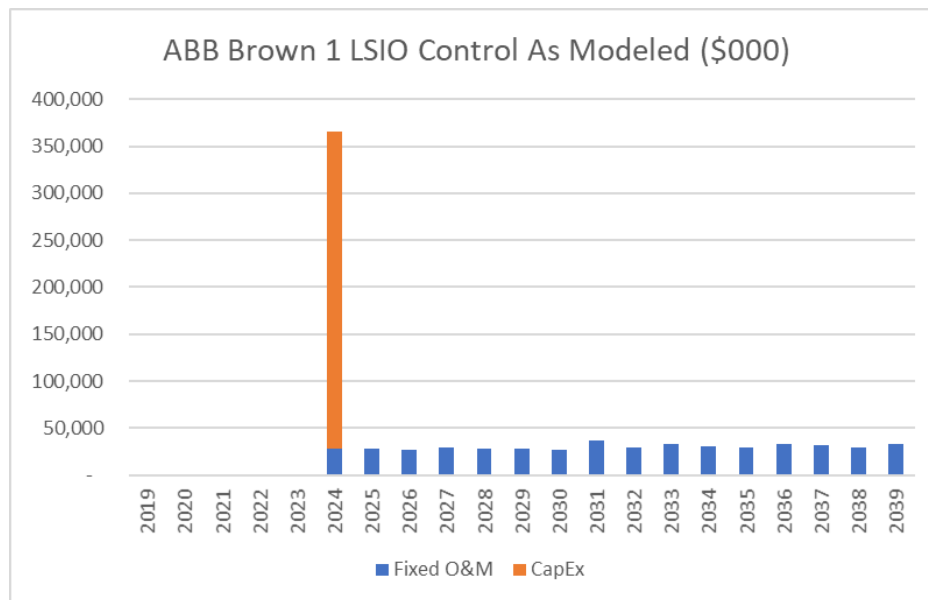
The CTs provide diversity in generation technologies and have option to be converted in the future.

**Q. Let's focus for a moment on the analysis of continued operations of A.B. Brown with upgraded emissions controls in the IRP. Is it a fair criticism to claim that the analysis was biased against the continued operation as the analysis considering the capital cost concentrated in 2025 rather than amortized over the life of the asset?**

A. No, I don't think it makes a difference at all and it was really the preference of the modeler. There is a time value of money and this works both ways in discounting for NPV calculations and for annualization of investments so it can be recovered over the life of the asset. We do this using the Capital Cost Recovery factor ("CCR") that multiplied by the capital investment of an asset converts it into a uniform stream of payments throughout the life of the asset. This was done for the capital investment of solar, wind and new

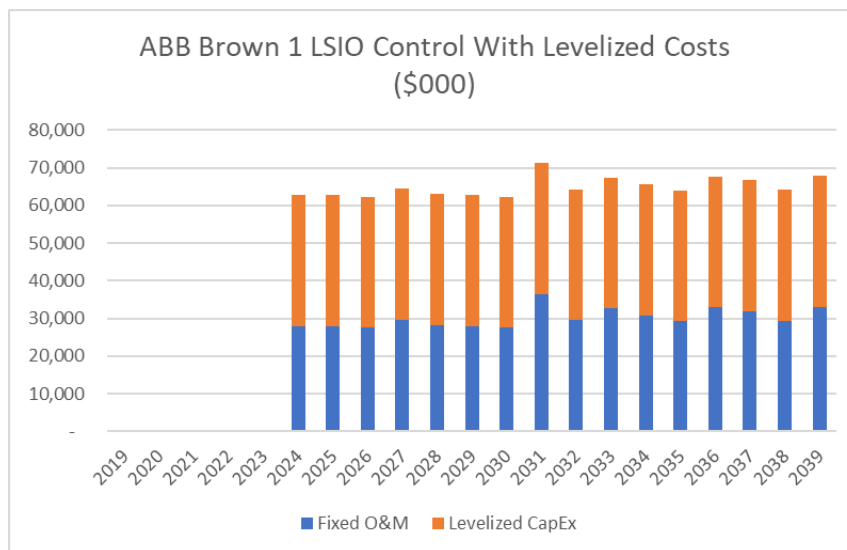
1 generation offered to the model as candidates for selection. However, in the case of the  
 2 A.B. Brown upgrades the modeler had the actual expected cashflow and modeled as such.  
 3 This is shown in the figure below. The NPV of this cashflow stream is (2019) \$401.2 million  
 4 at a discount rate of 7.71% equal to the CEI South's weighted average cost of capital used  
 5 in the IRP<sup>20</sup>.

**Figure 5**



6 The analyst could have annualized the CapEx component above using the same discount  
 7 rate above and 16 years amortization (the units would retire by the end of 2039) and  
 8 produce a cashflow like the one below which has exactly the same NPV (2019) \$401.2  
 9 million. Thus, there was no bias against the continuation of A.B. Brown, just the  
 10 economics.

<sup>20</sup> See pg. 257 of Volume I of the CEI South 2019/2020 IRP.

**Figure 6**

1 **Q Should CenterPoint Indiana South have amortized the new CTs proposed in the**  
2 **Preferred Portfolio over a much shorter life?**

3 A. No, I don't think so. Even if in the future Indiana or the EPA were to adopt a net-zero policy  
4 as for example New York's CLCPA that requires the state's generation to be zero  
5 emissions by 2040<sup>21</sup>, there is still a role for peaking generation like the CTs, which could  
6 be burning renewable natural gas ("RNG"), Green-Hydrogen or another net-zero  
7 emissions fuel. I was part of the team that conducted a study for the NY Research and  
8 Development Authority ("NYSERDA") to assess how the grid would evolve leading to a  
9 100% emissions grid by 2040<sup>22</sup>. In the study we found that the optimal expansion plan  
10 was a mix of storage and thermal generation that by 2040 would use RNG at a cost of  
11 \$23/MMBTU and subject to an availability limit of 32TBTU/year. We found that in the  
12 optimal plan there would be approximately 17,200 MW of thermal generation in the  
13 system, including some of the existing generation that did not retire and new CTs and  
14 combined cycle plants added as part of the expansion plan<sup>23</sup>.

<sup>21</sup> The New York Climate Leadership and Community Protection Act sets a goal of having a 100% emissions free electricity by 2040 (CLCPA) (see <https://climate.ny.gov/-/media/CLCPA/Files/CLCPA-Fact-Sheet.pdf>).

<sup>22</sup> See Appendix E: Zero Emissions Electric Grid in New York by 2040 [https://brattlefiles.blob.core.windows.net/files/20842\\_initial\\_report\\_on\\_the\\_new\\_york\\_power\\_grid\\_study.pdf](https://brattlefiles.blob.core.windows.net/files/20842_initial_report_on_the_new_york_power_grid_study.pdf).

<sup>23</sup> See Table 4-1 of Appendix E referenced in the prior footnote.

1 For this reason, I don't think it is necessary or prudent to reduce the life of the assets as  
2 proposed.

3

4 **Q As stated in "Response of CAC, Earthjustice, and Vote Solar to the Director's Draft**  
5 **Report for Vectren's 2019/2020 Integrated Resource Plan", do you agree that**  
6 **CenterPoint Indiana South's resource adequacy approach is inconsistent with the**  
7 **outcomes of MISO's policy change on the topic?**

8 A. No, I don't think the changes in MISO policy will have a significant impact on the plans.  
9 Upon my review of the models, I appreciated that CenterPoint Indiana South made sure  
10 that the portfolios would likely meet both summer and winter requirements, and any  
11 seasonal requirement for that matter. Yes, as noted in CAC, et. al. response, CenterPoint  
12 Indiana South used the same PRMR of 8.8% of the MISO coincident peak across all  
13 months, however I don't expect that this approximation will result in the plans being  
14 inadequate as I illustrate below.

15

16 First, Aurora's optimization ensured that there were enough resources to meet the most  
17 stringent yearly condition, which as expected happened in August of each year. This is  
18 shown in the figures below for 2030 for the Renewable+ Peak Gas, Renewable 2030 and  
19 High Technology portfolio, where the peak demand and reserve requirements are  
20 compared with the available capacity from resources across the year. In these figures the  
21 red line is the CEI South's coincident demand, and the dashed line includes on top of that  
22 the minimum reserve (8.9%) that Aurora maintained over this demand. This is compared  
23 with the capacity contribution, i.e., the ELCC I mentioned earlier, of all the resources in  
24 the portfolio including market capacity purchases that add up to a blue line "Total  
25 Resources" in the graphs.

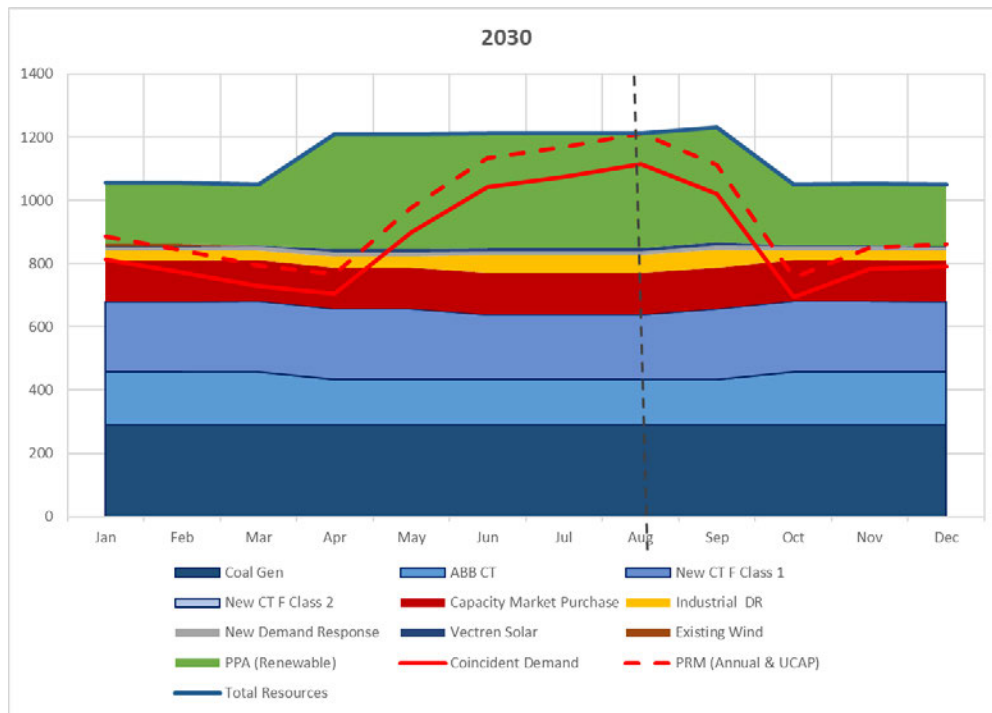
26

27 As can be observed in the graphs even though the ELCC of renewable dropped in late  
28 fall, winter, and early spring (see the reduction in the top green area representing the  
29 renewable and effect in Total Resources - blue line), this drop in Total Resources is more  
30 than compensated in by the concurrent drop in demand resulting in greater margins  
31 between the requirement (dotted line) and the availability (blue line). This is particularly  
32 clear for the Renewable + Flexible Gas and Renewable 2030, where we see that in August  
33 the dotted line and the blue line coincide, and "Capacity Market Purchases" were required

1 (red band) that in an "Annual" construct needs to be maintained throughout the year. A  
 2 similar situation is observed for the Renewable 2030, where again we see that during  
 3 August the available total resources (blue line) meet the requirements (dotted line) and  
 4 capacity purchases are required. We also note that in winter the margin of the resources  
 5 over the requirement is small. Finally, we see that for the High Technology case the  
 6 available resources were always above this year requirements and no market capacity  
 7 purchases were necessary.

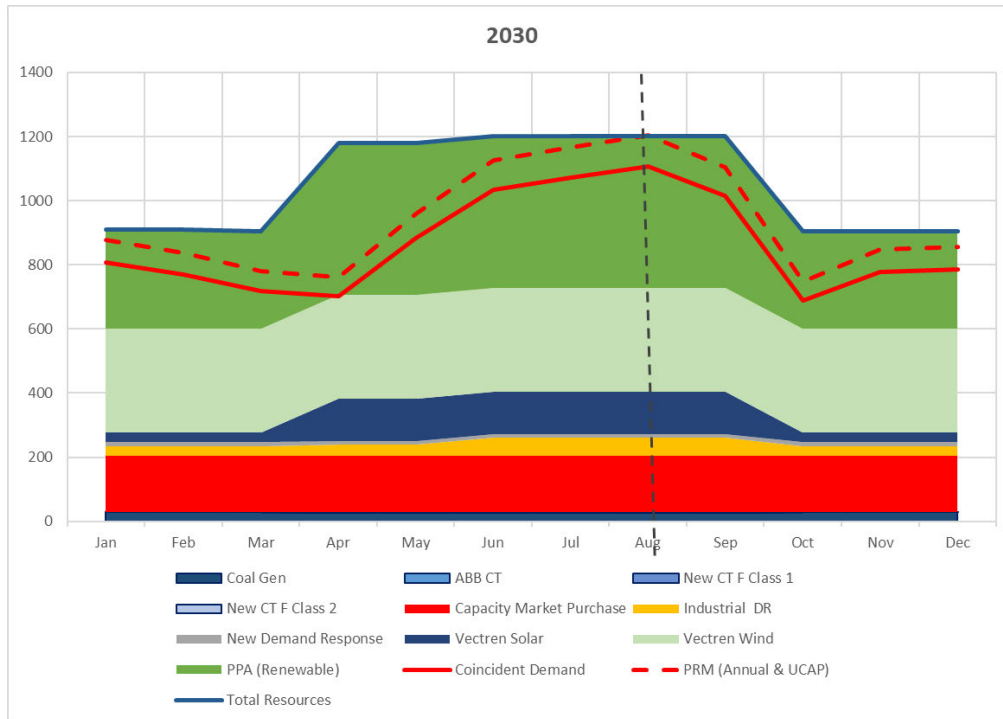
**Figure 7**

**Renewable + Flexible Gas Portfolio Demand, Reserves and Resources (MW).**

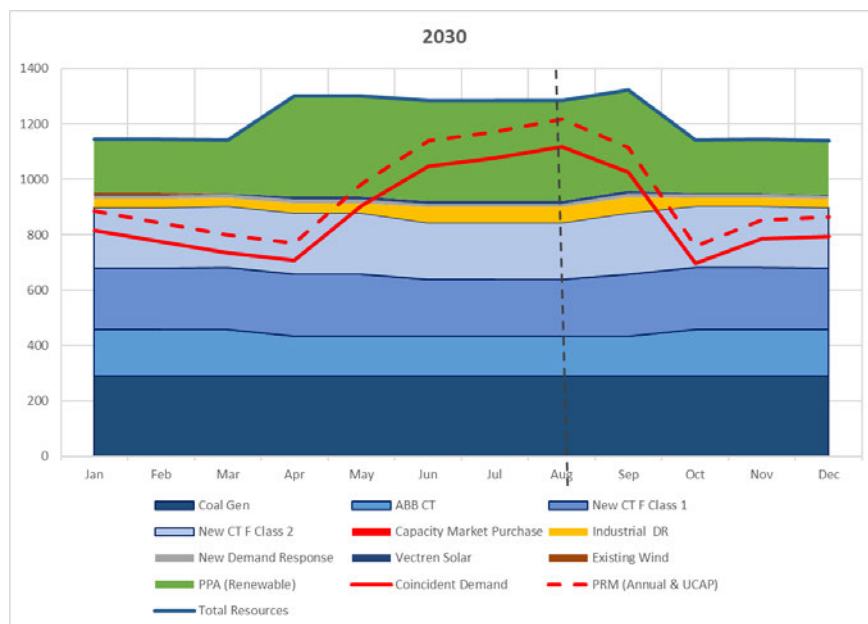




**Figure 8**  
**Renewable 2030 Demand, Reserves and Resources (MW).**



**Figure 9**  
**High Technology Portfolio Demand, Reserves and Resources (MW).**



1 In summary, the August requirement defined the capacity needs of the portfolio and to  
2 meet it market capacity purchases are required on the Renewable + Peak and  
3 Renewables 2030 portfolio.  
4

5 **Q. Please continue with your response to the comment of CAC/Earthjustice and Vote**  
6 **Solar, do you think a MISO Seasonal Construct would have a major impact?**

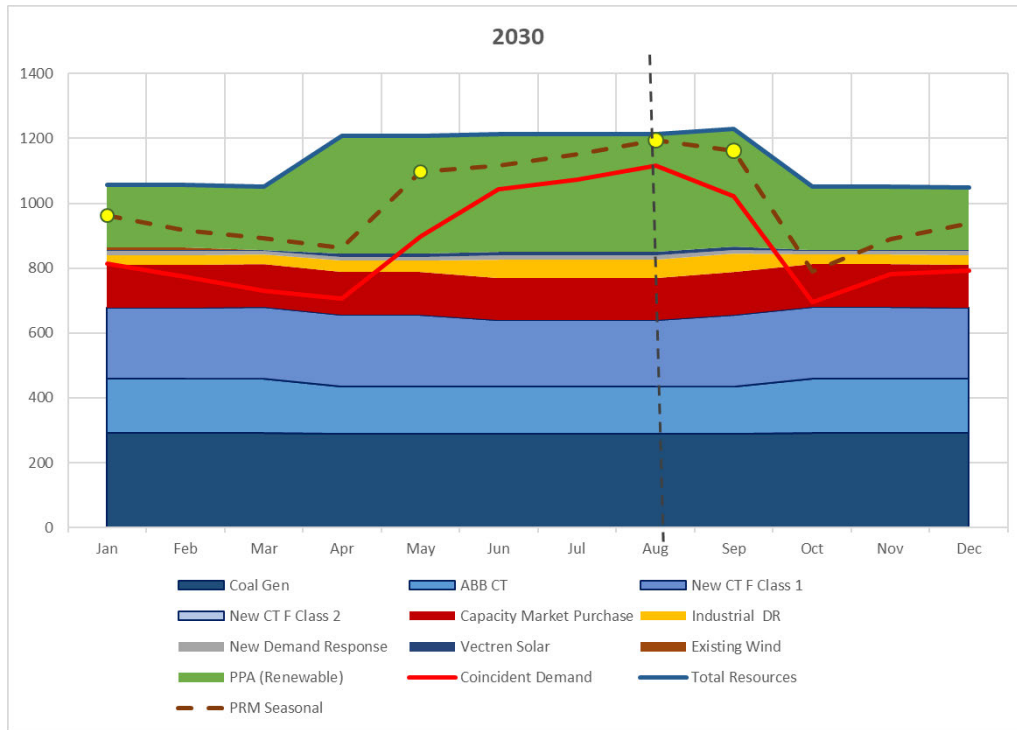
7 A. MISO has not yet defined what will be the final seasonal PRMR, however it is possible to  
8 illustrate how this may affect the Portfolios using the information shared by MISO on the  
9 "RAN Reliability Requirements and Sub-annual Construct"<sup>24</sup>. In MISO's document on  
10 page 23, the LRZ 6's Local Reliability Requirements ("LRR") (i.e., the amount of local  
11 resources to maintain an expectation that at maximum once every ten years there will not  
12 be enough resources to meet the load) are provided; and on page 31, the seasonal MISO  
13 wide PRMR% (UCAP) are also provided. On an annual basis for LRZ 6's and hence CEI  
14 South's, PRMR is given by the MISO System Wide PRMR. In MISO each LRZ needs to  
15 meet the largest of the MISO System-wide PRMR or a local reserve level called the Local  
16 Clearing Requirement (LCR), calculated as the Local Reliability Requirement less the  
17 LRZ's ability to import resources from MISO, which is given by the Zonal Import Ability  
18 (ZIA). Maintaining LRZ 6's Zonal Import Ability ("ZIA"), it is possible show that on a  
19 seasonal basis LRZ 6's PRMR should be given by the MISO System Wide PRMR, i.e., it  
20 is greater than LRZ 6's LCR. The figure below shows an illustrative impact of a MISO  
21 seasonal PRMR (UCAP based) of 7.1% in Summer, 18.5% for Winter, 22.3% for Spring  
22 and 13.8% for Fall for the 2030 demand and as before a comparison is made with the  
23 available resources. As can be observed the highest requirements occur in January, May,  
24 August, and September and are met by the available portfolio resources on those  
25 seasons. The only exception to the above is the Renewable 2030 for winter which may  
26 need to acquire a small amount of additional market capacity (~44 MW) to meet the  
27 requirement.

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<sup>24</sup> RAN Reliability Requirements and Sub-annual Construct (misoenergy.org):  
[https://cdn.misoenergy.org/20210203%20RASC%20Item%2004a%20Subannual%20Construct%20Presentation%20\(RASC010,%20011,%20012\)517859.pdf](https://cdn.misoenergy.org/20210203%20RASC%20Item%2004a%20Subannual%20Construct%20Presentation%20(RASC010,%20011,%20012)517859.pdf).

**Figure 10**

**Renewable + Flexible Gas Portfolio Demand, Reserves and Resources (MW).**



**Figure 11**

**Renewable 2030 Demand, Reserves and Resources (MW).**

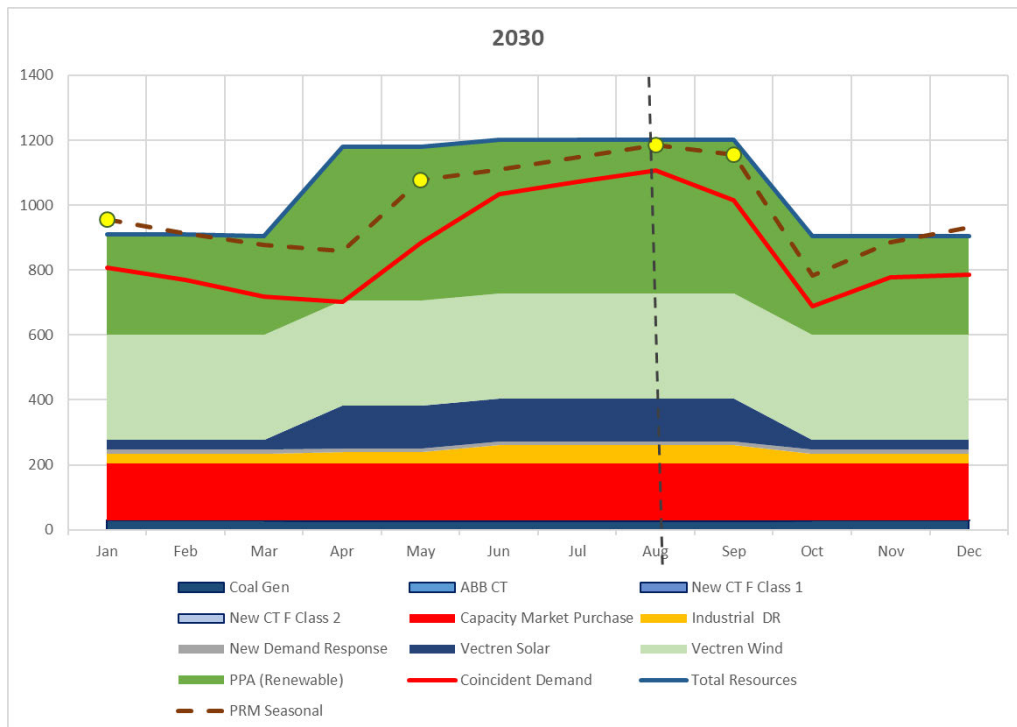
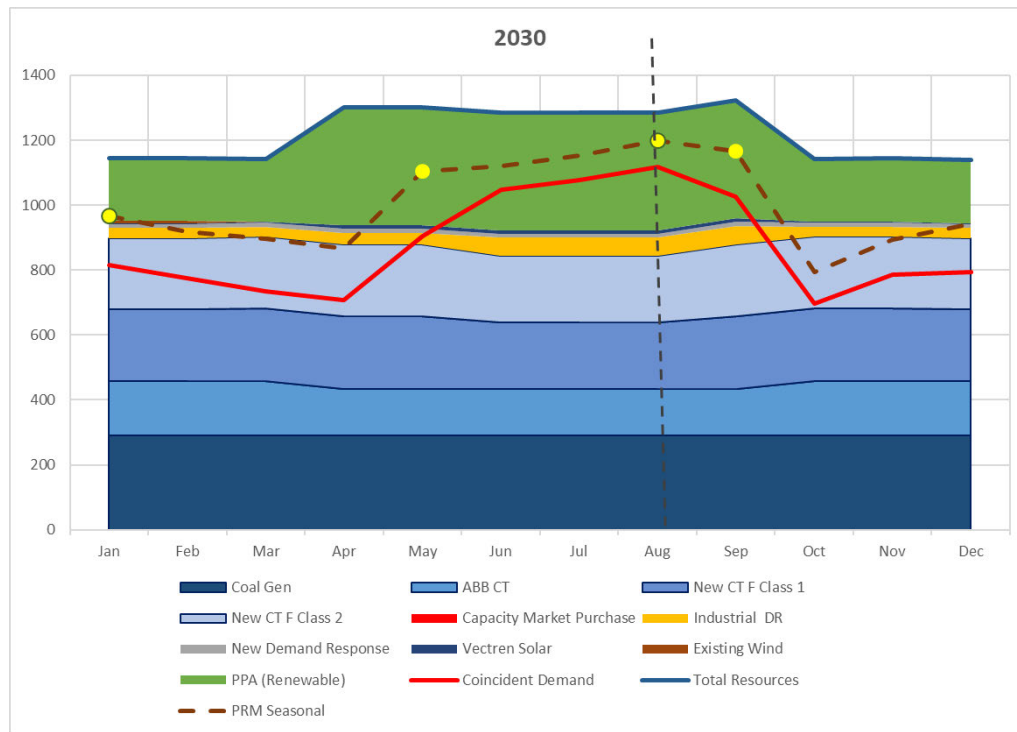


Figure 12

## High Technology Portfolio Demand, Reserves and Resources (MW).



1 In summary the analysis above leads me to the conclusion that CenterPoint Indiana  
 2 South's Preferred Portfolio as defined should fare well under a seasonal construct as well.  
 3 Note again, the red band on Renewable + Flexible Gas and Renewables portfolios that  
 4 show the capacity purchases, compared to the Preferred Portfolio.

5

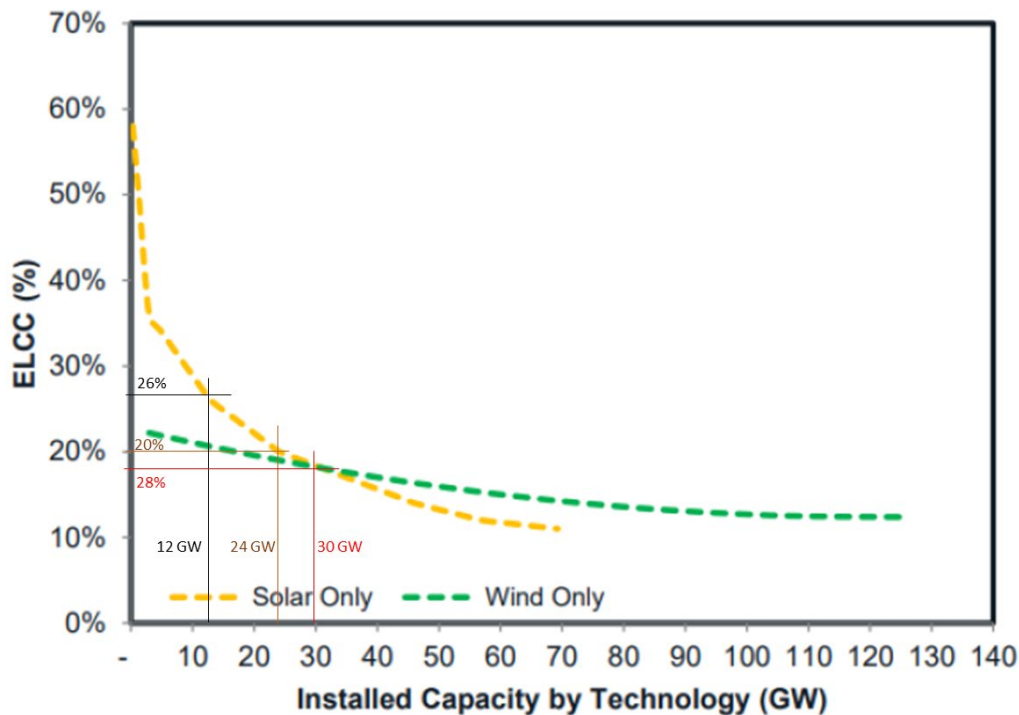
6 **Q As stated in "Response of CAC, Earthjustice, and Vote Solar to the Director's Draft**  
 7 **Report for Vectren's 2019/2020 Integrated Resource Plan", do you agree that the**  
 8 **ELCC of Solar and Wind is understated and if CenterPoint Indiana South had used**  
 9 **more appropriate values only one CT would be necessary?**

10 **A.** No, as I mentioned earlier the ELCC of renewable resources and storage decreases with  
 11 the penetration and in this context, penetration is the amount of generation installed in the  
 12 system as a whole, in this case MISO, not LRZ 6 or CEI South. For 2025 CenterPoint  
 13 Indiana South used a ELCC for solar of 26% for summer and 6% for winter and reducing  
 14 to 20% Summer and 4% winter for 2033, which is aligned with reasonable forecast of  
 15 solar. As shown in Figure 5-5 of the IRP, derived from MISO's Renewable Integration

1 Impact Assessment (RIAA) Assumptions Document and reproduced below<sup>25</sup>, we see that  
 2 MISO expects that solar will have an ELCC of 26% by the time the solar generation  
 3 installed in its footprint reaches slightly over 12 GW and a value of 20% by the time the  
 4 solar generation installed reaches slightly over 24 GW.

Figure 13

### Decreasing solar and wind ELCC as more is installed



5 It is reasonable to expect that the higher rather than the lower forecast will materialize.  
 6 By the end of 2020 MISO there were approximately 1,492 MW of solar generation in its  
 7 footprint<sup>26</sup> and over 36 GW of solar in its interconnection queue<sup>27</sup>. Based on this alone it  
 8 is reasonable to expect that by 2025 there will be more than 12 GW of solar in MISO's  
 9 footprint and that by 2033 there should be 30 GW or more.

<sup>25</sup> See MISO Renewable Integration Impact Assessment (RIIA) assumptions document V6, [https://cdn.misoenergy.org/RIIA%20Assumptions%20Doc\\_v7429759.pdf](https://cdn.misoenergy.org/RIIA%20Assumptions%20Doc_v7429759.pdf).

<sup>26</sup> Planning Year 2020-2021 Wind and Solar Capacity Credit (<https://cdn.misoenergy.org/2020%20Wind%20&%20Solar%20Capacity%20Credit%20Report408144.pdf>).

<sup>27</sup> See MTEP 2020 pg. 23 <https://cdn.misoenergy.org//MTEP20%20Full%20Report485662.pdf>.

1           However, this is not the only evidence I see of the reasonableness of this assumption.  
2           MISO's Futures, which have the goal to provide bookends for the different generation  
3           technologies<sup>28</sup>, forecast that for 2033 there will be a minimum of 7.2 GW of Solar on the  
4           pessimistic Limited Fleet Change ("LFC") Future, increasing to 13.5 GW of Solar in the  
5           Continued Fleet Change ("CFC") Future, 30.4 GW of Solar in the Accelerated Fleet  
6           Change ("AFC") Future, reaching a maximum of 42.7 GW in the Distributed and Emerging  
7           Technologies ("DET") Future. This is a quite wide range, but once combined with the  
8           status of the interconnection queue and the current tendency for an acceleration of solar  
9           generation as municipalities, states and utilities address the challenges of climate change;  
10          it stands to reason that the future solar generation should be more aligned with AFC or  
11          even the DET forecasts.

12  
13          Hence and looking at the figure above we see that with 30 GW or more of solar in MISO's  
14          system a solar ELCC of 20% or lower is to be expected.

15  
16          For winter, MISO currently uses a solar ELCC of 5%<sup>29</sup> and this will reduce as penetration  
17          increases.

18  
19          Based on the above, I disagree with the statement that on the High Technology Portfolio  
20          there would be adequate reserves with only one CT. To illustrate this, I show below the  
21          gap between the Total Resources (blue curve) and capacity needs (dotted brown curve)  
22          for 2033 using the illustrative seasonal PRMR. As can be observed there are gaps across  
23          all seasons.

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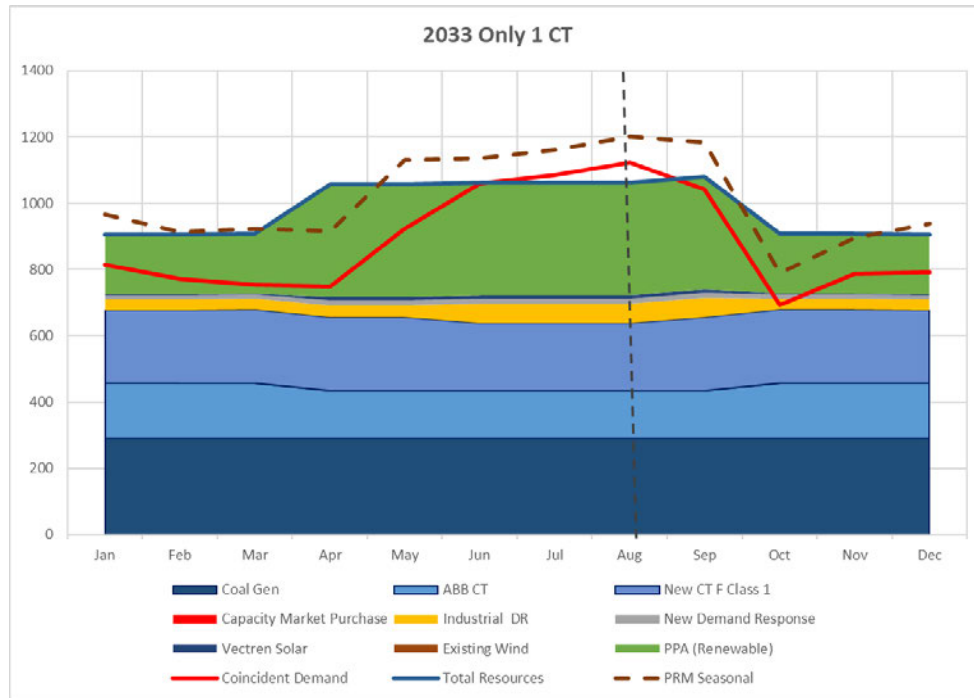
<sup>28</sup> See MTEP 2020 pg. 28 <https://cdn.misoenergy.org//MTEP20%20Full%20Report485662.pdf>.

<sup>29</sup> See page 24 of MISO RAN Reliability Requirements and Sub-annual Construct  
(misoenergy.org):

[https://cdn.misoenergy.org/20210203%20RASC%20Item%2004a%20Subannual%20Construct%20Presentation%20\(RASC010,%20011,%20012\)517859.pdf](https://cdn.misoenergy.org/20210203%20RASC%20Item%2004a%20Subannual%20Construct%20Presentation%20(RASC010,%20011,%20012)517859.pdf).

**Figure 14**

**High Technology Portfolio Demand, Reserves and Resources (MW); 2033 with One CT.**



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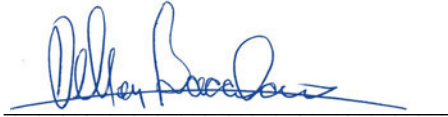
**III. CONCLUSION**

**Q. Does this conclude your direct testimony in this proceeding?**

**A. Yes, at the present time.**

**VERIFICATION**

I, Nelson Bacalao, under the penalty of perjury, affirm that the answers in the foregoing Direct Testimony are true to the best of my knowledge, information and belief.



Nelson Bacalao  
Principal Consultant, Siemens PTI



PTI Consulting

# Nelson Bacalao

Principal Consultant



## Career Highlights

Dr. Bacalao has over 35 years of extensive experience in providing technical and strategic consulting services to utilities, governments, regulators, independent project developers, and the financial community, in the US and internationally. He combines a rigorous academic training in engineering and business with utility, government and consulting experience in the technical, economic, and regulatory aspects of utility systems.

Dr. Bacalao core competencies are in the areas of Production costing and Market Analysis, Transmission and Distribution planning, with recent year's emphasis in the Integrated Resources Planning Studies, the integration of renewable generation and system resiliency. Dr. Bacalao also provides expert testimony in support of regulatory processes and the approval of IRPs by regulatory commissions.

## Experience

Dr. Bacalao specializes in utility operations and planning. He has provided due diligence evaluation and/or assessment of transmission and distribution utilities for banks, investors and utility management for more than 30 transmission and distribution companies in 11 countries.

His consulting engagements typically include one or more of the following tasks: (a) system studies, i.e. load flow, stability and reliability, (b) market studies including production cost, and congestion analysis, (c) Review of generation and transmission capital cost forecast, load forecasts and fuel forecasts, (d) Formulation of long term generation capacity expansion plans, including the effects of DER, Battery Energy Storage System, Energy Efficiency and Electrification, (e) Revenue estimation, evaluation of rate structure and assessment on return on investments, and (g) formulation of medium and long-term strategic plans.

Given the difficulty of transmission planning in deregulated electric sectors and the special intermittent nature of renewable generation, Dr. Bacalao has developed strong transmission planning experience under uncertainty. He has performed or supervised numerous studies of this type for systems including voltages up to 765 kV. In these studies, Dr. Bacalao conducted or managed the system evaluations including the formulation of transmission expansion options, load flow and stability studies, production costing impact and, most importantly, the risk evaluations to determine minimum "regret option" and hedging strategies.

Dr. Bacalao has managed or participated in the development of Integrated Resource Plans, feasibility evaluations and technical due diligence analyses of numerous electric generation projects. These studies have included: definition of optimal plant sizes and timing (capacity expansion plans), system impact studies and feasibility (transmission interconnection definition), estimation of capital expenditures and construction time, definition of financing strategy, projection of fuel and non-fuel costs, and production of projected financial pro forma statements.

Dr. Bacalao has solid experience in regulation for the energy industry, with emphasis on grid codes reviews, transmission tariff formulation and periodic reviews. He has provided these types of services to regulators, investors and utilities in countries as diverse as the USA, Puerto Rico, Guyana, Mexico, Turkey, Malawi, Belize, Venezuela and South Africa.

Dr. Bacalao has solid experience in regulation for the energy industry, with emphasis on transmission tariff formulation

Dr. Bacalao has worked in countries across the globe for such multilateral institutions as the World Bank, the Overseas Private Investment Corporation (OPIC), and the Inter-American Development Bank (IDB).

#### Areas of Expertise

- Transmission Planning
- Generation Expansion Planning
- Generation Interconnection Studies
- Distribution System Planning
- Capital Expenditure Evaluations
- Operating Expenditure Evaluations
- Financial and Economic Modeling
- Due Diligence Evaluations
- Load Forecasting
- Uncertainty and Risk Considerations
- Resiliency assessments
- Generation Transmission Deliverability Studies
- Production Costing
- Hydro-Thermal Dispatch Forecasts
- Optimal Thermal Unit Commitment
- Estimation of Renewable Generation Impacts on Ancillary Services such as Frequency Regulation, Load Following and Reserves
- Hydro-thermal Scheduling

#### Education

- MBA level program, Advanced Managerial Program (PAG-VII) Instituto de Estudios Superiores en Administración (IESA), Caracas, Venezuela, 1990
- PhD, Electrical Engineering, University of British Columbia, Vancouver, BC, Canada, 1987
- Master Engineering (Electrical), Rensselaer Polytechnic Institute, Troy, NY, 1980
- Electrical Engineer, Universidad Simón Bolívar, Caracas, Venezuela, 1979

#### Professional Memberships

- Member of the IEEE and its Power & Energy Society
- Member of the Colegio de Ingenieros de Venezuela

#### Languages

- English
- Spanish

#### Publications

1. "The Role of HVDC in Wind Integration in the Grid of the Future," presented at the CIGRE US National Committee 2012 – Grid of the Future Symposium, Kansas City, MO, October 28 – 30, 2012 (co-authors: W. Galli, A. Landon, and M. Korytowski).
2. "An Efficient Method for Planning Low Voltage Secondary Distribution Networks: Selection of Transformer Ratings and Conductor Types," presented at the DistribuTECH Conference and Exposition, Tampa, FL, March 23, 2010 (co-authors: J.C. Ledezma and P. Duvoor).
3. "Considerations on the Use of HVDC for CREZ Transmission," presented at the IEEE 2009 Power System Conference and Exhibition, Seattle, WA, August 2008 (co-authors: W. Galli, M. Hutson, and R. Nadira).
4. "Measuring the Performance of Distribution Utilities - A Top-Down/Bottom-Up Approach," in *Proc. 2006 IEEE PES Latin American T&D C&E*, Caracas, Venezuela (co-author: R. Nadira).
5. "Strategic Assessment of Supply Options in Power Systems with Significant Supply Uncertainty," in *Proc. Probabilistic Methods Applied to Power Systems (PMAPS-2004)*, September 12-16, 2004, Iowa State University, Ames, IA, pp. 867-872 (co-authors: R. Nadira, H. Fendt, C. Dortolina, and J. Di Bella).
6. "Supply Risk Analysis in Electricity Markets from the Perspective of a Large Customer," in *Proc. 2004 IEEE PES General Meeting*, Denver, CO, June 2004, pp. 180-185, vol. 1 (co-authors: H. Fendt, R. Nadira, C. Dortolina, and J. Di Bella).
7. "PCAP Program Adapted for Islanding Studies: Integrated Resource Planning in Developing Countries - A Novel Approach," presentation in panel session of IEEE PES General Meeting, Denver, 2004 (co-authors: C. Dortolina and M.P. De Arizón).

8. "Evaluation of Transmission Tariff Methods in Restructured Power Markets," in *Proc. IEEE 2003 PES General Meeting*, Toronto, ON, Canada, July 2003, vol. 2 (co-authors: R. Nadira, H.M. Merrill, and C. Dortolina).
9. "Evaluation and Design for Compact Transmission Lines," 4th Jornadas Hispano-Lusas, Oporto-Portugal, July 1995 (co-author: M.P. De Arizón).
10. "A Model for the Synchronous Machine using Frequency Response Measurements," IEEE, San Francisco, CA, 1994 (co-author: M.P. De Arizón).
11. "Study for the Insulation Level Optimisation of 230 kV and 115 kV Substations," IEEE, Latincon 1992 (co-author: M.P. De Arizón).
12. "A New Methodology for the Optimisation of Insulation Levels in 230 kV and 115 kV Substations," CIGRE, Argentina, 1991 (co-author: M.P. De Arizón).
13. "Transient Stability Studies for the Venezuelan Bulk Transmission System Considering HVDC links," Erlac-Cigre Foz de Iguazu, Brazil, 1988 (co-authors: G. Pesse, J.M. Aller, M.P. De Arizón, and A. Negrin).
14. "Optimal Tuning of Power System Stabilizers," IV Power System Congress, Puerto La Cruz, Venezuela, 1986.
15. "Fast Stability Simulations Based on Frequency Responses," IV Power System Congress, Puerto La Cruz, Venezuela, 1986.
16. "Modeling of an HVDC Link in a Load Flow and Stability Program," IV Power System Congress, Puerto La Cruz, Venezuela, 1986.