# OFFICIAL EXHIBITS

FILED June 20, 2022 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-135 IURC PUBLIC'S EXHIBIT NO.

#### INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

#### **PUBLIC'S EXHIBIT NO. 2**

#### TESTIMONY OF OUCC WITNESS MICHAEL D. ECKERT

June 20, 2022

Foriaine Hitz

Lorraine Hitz Attorney No. 18006-29 Deputy Consumer Counselor

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#### TESTIMONY OF OUCC WITNESS MICHAEL D. ECKERT CAUSE NO. 38708 FAC-135 <u>SOUTHERN INDIANA GAS AND ELECTRIC COMPANY</u> <u>("CEI SOUTH")</u>

### I. INTRODUCTION

1	Q:	Please state your name, business address, and employment capacity.
2	A:	My name is Michael D. Eckert and my business address is 115 W. Washington St.,
3		Suite 1500 South, Indianapolis, IN, 46204. I am employed as the Director of the
4		Electric Division for the Indiana Office of Utility Consumer Counselor ("OUCC").
5		My qualifications are set forth in Appendix A of this document.
6 7	Q:	Have you previously testified before the Indiana Utility Regulatory Commission ("Commission")?
8	A:	Yes.
9	Q:	What is the purpose of your testimony in this cause?
10	A:	I analyze Southern Indiana Gas and Electric Company's d/b/a CenterPoint Energy
11		Indiana South ("CEI South" or "Petitioner") fuel clause adjustment ("FAC")
12		request and the (1) applicability of Cause No. 43414 as it relates to purchased power
13		over the benchmark; (2) impact of contestable revenue sufficiency guarantee
14		("RSG") charges; (3) ancillary services market ("ASM"); (4) bill analysis; (5)
15		steam generation costs; (6) actual cost of fuel (Mills/kWh) comparison; (7) coal
16		inventory; (8) line-loss adjustment; (9) wind farms; 10) commitment status; and 11)
17		Troy Solar. Ultimately, the OUCC recommends the Commission require CEI South
18		to update the Commission in its next FAC filing on its current coal inventory
19		situation, as further described in my testimony below. The OUCC further

1		recommends the Commission approve CEI South's proposed fuel cost factor as
2		recalculated and confirmed by OUCC witness Gregory T. Guerrettaz.
3 4	Q:	Please describe the review and analysis you conducted in order to prepare your testimony.
5	A:	I read CEI South's prefiled testimony and verified petition in this proceeding, as
6		well as relevant Commission Orders. I reviewed CEI South's workpapers, CEI
7		South's responses to OUCC data requests, and pertinent sections of Title 8 of the
8		Indiana Code and Title 170 of the Indiana Administrative Code. I participated in
9		meetings and conference calls with CEI South personnel. The OUCC performed its
10		field audit remotely via conference call and WebEx on Thursday, June 16, 2022
11		and Friday, June 17, 2022. I participated in meetings with other OUCC staff
12		members and CEI South personnel in developing issues identified in this Cause.
		II. <u>PURCHASED POWER OVER THE BENCHMARK</u>
13 14	Q:	II. <u>PURCHASED POWER OVER THE BENCHMARK</u> Did CEI South purchase any power that exceeded the purchased power benchmark approved by the Commission in Cause No. 43414?
	<b>Q:</b> A:	Did CEI South purchase any power that exceeded the purchased power
14		Did CEI South purchase any power that exceeded the purchased power benchmark approved by the Commission in Cause No. 43414?
14 15		Did CEI South purchase any power that exceeded the purchased power benchmark approved by the Commission in Cause No. 43414? Yes. CEI South provided workpapers that show it incurred \$144,962.40 of
14 15 16		<b>Did CEI South purchase any power that exceeded the purchased power benchmark approved by the Commission in Cause No. 43414?</b> Yes. CEI South provided workpapers that show it incurred \$144,962.40 of purchased power costs that exceeded the benchmark during the three-month period
14 15 16 17 18	A:	<ul> <li>Did CEI South purchase any power that exceeded the purchased power benchmark approved by the Commission in Cause No. 43414?</li> <li>Yes. CEI South provided workpapers that show it incurred \$144,962.40 of purchased power costs that exceeded the benchmark during the three-month period December 2021 through February 2022.</li> <li>Does the OUCC agree with CEI South's calculation of purchased power over</li> </ul>
14 15 16 17 18 19	A: <b>Q:</b>	<ul> <li>Did CEI South purchase any power that exceeded the purchased power benchmark approved by the Commission in Cause No. 43414?</li> <li>Yes. CEI South provided workpapers that show it incurred \$144,962.40 of purchased power costs that exceeded the benchmark during the three-month period December 2021 through February 2022.</li> <li>Does the OUCC agree with CEI South's calculation of purchased power over the benchmark?</li> </ul>

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#### III. CONTESTABLE RSG

1	Q:	Did CEI South incur contestable RSG charges for the months of December
2		2021, January 2022, and February 2022?

- 3 A: Yes. CEI South incurred \$6,136.45 in contestable RSG charges for the three-month
- 4 period, which are recovered through CEI South's MISO Cost and Revenue
- 5 Adjustment ("MCRA") mechanism.

#### IV. ANCILLARY SERVICES MARKET ("ASM")

# 6 Q: Is CEI South continuing to follow the ASM ratemaking treatment authorized 7 by the Commission?

- 8 A: Yes. CEI South's current ratemaking treatment for the ASM charge types follows
- 9 the treatment authorized by the Commission in its Cause No. 43426 Phase II Order,
- 10 dated June 30, 2009.

#### V. BILL ANALYSIS

- 11Q:Have you calculated the bill impact on a typical residential customer's bill12using 500, 1,000, 1,500, and 2,000 kWhs at the proposed rate and compared13that to the same typical customer's bill using the currently approved rate?
- 14 A: Yes. I did, as shown in the following table:

15		Bill at	Bill at		
16		Proposed	Current	Dollar	% Increase
17	<b>Consumption</b>	FAC	FAC	Inc/(Dec)	/(Decrease)
18	500	\$75.78	\$74.99	\$0.79	1.05%
19	1,000	\$140.71	\$139.13	\$1.58	1.13%
20	1,500	\$205.65	\$203.28	\$2.37	1.16%
21	2,000	\$270.58	\$267.43	\$3.15	1.18%

#### 22 Q: What assumptions did you make in this calculation?

- 23 A: In making this calculation, I did not include any amount for other trackers, nor did
- 24 I include taxes. Therefore, this calculation only reflects the proposed change to the
- 25 FAC factor and CEI South's base rates.

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1 2	Q:	Have you provided a calculation of a typical customer's bill using 1,000 kWh in June 2022?
3	A:	Yes. See Attachment MDE-3. A typical residential customer using 1,000 kWh in
4		June 2022 will pay (excluding taxes) \$165.99. This amount consists of \$146.24 in
5		base charges that were set during CEI South's last rate case (Cause No. 43839),
6		(\$5.04) in fuel adjustment clause charges, and \$24.79 in non-FAC trackers (DSMA,
7		CECA, ECA, MCRA, RCRA, & TDSIC).
		VI. ACTUAL COST OF FUEL (MILLS/KWH) COMPARISON
8 9	Q:	VI. <u>ACTUAL COST OF FUEL (MILLS/KWH) COMPARISON</u> Did you do a comparison of the actual monthly cost of fuel (Mills/kWh) for the five large Electric IOUs?
	<b>Q:</b> A:	Did you do a comparison of the actual monthly cost of fuel (Mills/kWh) for the
9		Did you do a comparison of the actual monthly cost of fuel (Mills/kWh) for the five large Electric IOUs?

# 12Q:Did you do a comparison of steam generation costs for the five large Indiana13Electric Investor-Owned Utilities ("IOUs")?

- 14 A: Yes. CEI South's steam generation costs are comparable or lower than the other
- 15 Electric IOUs in the State of Indiana (See Attachment MDE-2).

### VIII. COAL PRICE REVIEW

- 16Q:Has the OUCC been reviewing weekly historical coal prices on an MMBtu17basis and dollar basis?
- 18 A: Yes. The OUCC monitors weekly historical coal prices as published by the U.S.
- 19 Energy Information Administration ("EIA") on SNL Energy. The two EIA graphs
- 20 below depict the historical price of coal on a MMBtu basis and a dollar basis and
- 21 show that coal prices increased dramatically over the last 9 months.

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#### Coal markets archive





ela Source: U.S. Energy Information Administration, based on SNL Energy

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### IX. COAL INVENTORY

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1	Q:	What is the current level of CEI South's coal inventory?									
2	A:	CEI South's coal inventory as of April 30, 2022, was 349,663 tons, which is									
3		approximately 129,044 tons higher than what was reported in FAC-134.									
4	Q:	Is CEI South actively trying to manage its coal purchases and coal inventory?									
5	A:	Yes. CEI South indicated in discussions with the OUCC it has taken actions to									
6		increase its coal inventory.									
7	Q:	Should CEI South continue to update the Commission on its coal inventory?									
8	A:	Yes. CEI South should continue to provide the inputs to its calculation of the coal									
9		inventory. In addition, CEI South should update the Commission on its 2022									
10		projected coal burn, coal purchases and coal inventory.									
	X. <u>COAL DECREMENT PRICING</u>										
11	Q:	Is CEI South currently utilizing coal decrement pricing?									
12	A:	No. Coal decrement pricing involves bidding coal units into the MISO market									
13		below cost so they will be more competitive, more likely to be dispatched, and									
14		avoid expenses associated with off-site storage of excess coal inventory.									
15	Q:	What does the OUCC recommend?									
16	A:	The OUCC recommends CEI South file testimony, schedules, and workpapers to									
17		justify any actual or anticipated need for coal decrement pricing or any other type									
18		of pricing in future FAC filings.									
		XI. <u>LINE-LOSS ADJUSTMENT</u>									
19 20	Q:	Did you review CEI South's line-loss calculation to determine if it complied with the Commission's Cause No. 38708 FAC-91 and FAC-92 Orders?									
21	A:	Yes. CEI South complied with the Commission's Cause No. 38708 FAC-91 and									

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1 FAC-92 Orders regarding line-loss calculations.

#### XII. WIND FARMS

- 2 Q: Did you ask CEI South personnel about Benton County Wind Farm
  3 ("BCWF") and Fowler Ridge II ("FRII") negative Locational Marginal Prices
  4 ("LMPs")?
- 5 A: Yes. CEI South experienced negative LMPs with BCWF and FRII and is
- 6 monitoring the situation.

#### XIII. <u>UNIT COMMITMENT STATUS</u>

# 7 Q: Does the OUCC review CEI South's unit commitment practices during its 8 FAC audit?

- 9 A: Yes. The OUCC generally reviews CEI South's unit commitment and Mr.
- 10 Guerrettaz's testimony details some of the analysis done by the OUCC during its
- 11 FAC audit. In general, the OUCC's FAC audit process has focused more on the
- 12 cost of fuel and the cost of purchased power.

#### XIV. TROY SOLAR

# 13Q:Did CEI South make an adjustment to Net Operating Income to exclude Troy14revenues and expenses from the FAC earnings test?

- 15 A: Yes. In Cause No. 45086, the Commission approved a settlement agreement
- 16 between Vectren South, Citizens Action Coalition, and the OUCC. Paragraph 11(d)
- 17 states:

18 All costs and recoveries associated with the Solar Project will be 19 excluded from the actual Net Operating Income utilized for the quarterly Fuel Adjustment Clause statutory earnings test. All costs 20 and recoveries associated with the Solar Project will be excluded 21 from the calculation of Vectren South's electric revenue 22 23 requirement in each rate case over the life of the Solar Project. The Solar Project will be excluded from Rate Base in such future base 24 25 rate cases. In addition, the Solar Project CECA revenue and 26 expenses will be excluded from the calculation of the Revenue

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Requirement in such future base rate cases.

#### XV. <u>RECOMMENDATIONS</u>

- 2 Q: What does the OUCC recommend?
- 3 A: The OUCC recommends the Commission:
- 4 1) Approve CEI South's proposed fuel cost factors as recalculated and confirmed by Mr. Guerrettaz;
- 6 2) Continue to monitor and require CEI South to update the Commission on
  7 the status of its fuel cost, coal inventory, and its mix of power supply
  8 sources in its next FAC filing;
- 9 3) Require CEI South to update the Commission regarding its coal 10 procurement practices, coal requests for proposals, coal price reopeners, and 11 any coal contract changes through its FACs;
- 124)Require CEI South to update the Commission on its current coal inventory,132022 projected coal burn and coal purchases; and
- 145)Require CEI South to provide the inputs to its calculation of the coal price15decrement, and the reasons for any use of decrement pricing or any other16coal pricing mechanism.
- 17 Q: Does this conclude your testimony?
- 18 A: Yes, it does.

#### **APPENDIX A – QUALIFICATIONS OF MICHAEL D. ECKERT**

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

2 A: I graduated from Purdue University in West Lafayette, Indiana in December 1986, 3 with a Bachelor of Science degree, majoring in Accounting. I am licensed in the 4 State of Indiana as a Certified Public Accountant. Upon graduation, I worked as a Field Auditor with the Audit Bureau of Circulation in Schaumburg, Illinois until 5 6 October 1987. In December 1987, I accepted a position as a Staff Accountant with 7 the OUCC. In May 1995, I was promoted to Principal Accountant and in December 8 1997, I was promoted to Assistant Chief Accountant. As part of the OUCC's 9 reorganization, I accepted the position of Assistant Director of its 10 Telecommunications Division in July 1999. From January 2000 through May 2000, 11 I was the Acting Director of the Telecommunications Division. During an OUCC 12 reorganization, I accepted a position as a Senior Utility Analyst and in September 2017, I was promoted to Assistant Director of the Electric Division. In February 13 14 2022, I was promoted to the Director of the Electric Division. As part of my 15 continuing education, I have attended the National Association of Regulatory 16 Utility Commissioners ("NARUC") two-week seminar in Lansing, Michigan. I attended NARUC's Spring 1993 and 1996 seminar on system of accounts. In 17 18 addition, I attended several CPA sponsored courses and the Institute of Public 19 Utilities Annual Conference in December 1994 and December 2000.

Actual Cost of Foel (AllIdsXVA) Comparison																							
Moula	Year	Duke	FAC	Indiana Michigan Power	FAC	Indianapoli & Power & Light	FAC	NIPSCO	PAC	CenterPoint South 23.258	FAC #	Month	Year	Duke Enerry	FAC #	Indapa Michigan Power	FAC #	indiarapoli s Power & Light	FAC #	NIPSCO	FAC #	Casto Point South 26.598	FAC #
January February March	2007 2007 2007	Energy 18.974 20.526 16.663	71 72 73	12.337 11.853 11.358	59 59 59	16,730 18,388 18,436	75 76 76	NIPSCO 26:497 33:278 26:336	75 75 75	23.258 22.609 25.221	75 75 76	July Asunst September	2014 2014 2014	Energy 32.587 34.960 29.212	102 102 103	16.282 16.243 14.004	74 74 74	30 751 28.445 30.773	105 106 106	29.863 32.375 30.605	105 105 105	26.598 26.957 28.067	105 105 106
April	2007	20.748	73	12.022	59	17.626	76	25.958	76	23.806	76	October	2014	32 201	103	19_319	74	32,170	106	32.872	106	28.095	106
May	2007	21.021	73	11.225	59	17.807	77	30.934	76	22.858	76	November	2014	36.849	103	20_385	74	33,967	107	31.478	106	32.155	106
June	2007	17.418	74	11.088	60	15.589	77	32.563	76	18.872	77	December	2014	31.889	104	14,991	75	30,310	167	28.582	106	29.112	107
July August August September	2007 2007 2007 2007	21.455 26.428 18.147	74 74 75	11.943 12.454 13.895	60 60 60	17.772 21.676 18.446	77 78 78	35.423 35.433 26.607	77 77 77	24.456 29.769 28.097 22.298	77 71 77 78	January February Marela	2015 2015 2015	30 854 32.468 27.290	104 104 105	17.009 17.573 16.500	75 75 75	32.323 35.110 33.821	107 105 108	27,708 28,799 27,126	107 107 107	29.391 29.554 30.336	107 107 108
October	2007	21.620	75	14.564	60	21 142	78	24.308	78	25.574	78	April	2015	28.062	105	20.400	75	31.806	108	26 642	108	30 921	108
Noveniller	2007	16.620	75	13.773	60	17,260	79	24.781	78	19.199	78	May	2015	29.738	105	16,035	75	32.544	109	30,967	108	28.615	108
December	2007	18.545	76	11.834	61	17,212	79	40.363	78	23.509	79	June	2015	28.414	106	21,581	76	32.135	109	29,840	108	28.305	109
January	2008	21.946	76	12.156	61	18.146	79	28.307	79	23.349	79	July	2015	27.835	106	21,461	76	29.603	109	30.308	109	27.887	109
February	2008	22.933	76	13.413	61	18.902	80	32_597	79	25.213	79	August	2015	26.964	106	16,383	76	30.582	110	29.217	109	26.355	109
March	2008	29.699	77	14.311	61	(9.380	80	33.271	79	27.944	80	September	2015	25.864	107	13,252	76	32.514	110	27.402	109	27.100	10
April May June	2008 2006 2008	24.034 20.159 30.286	77 77 78	16.399 14.082 15.185	61 62	18.572 16,300 23,130	80 81 81	28.639 28.679 33.815	80 80 80	27.651 21.578 32.326	80 80 51	October November December	2015 2015 2015	24.907 25 149 24.158	107 107 108	16,624 15,709 15 995	76 76 77	33.759 33.194 33.630	110 111 111	29.667 29.507 25.701	110 110 110	29.740 30.239 29.131	110 110 111
July	2008	25.296	78	15.569	62	24.171	81	32.511	81	26.389	61	January	2016	26 742	108	16.819	77	31.011	111	28,094	111	29.836	111
August	2008	25.728	78	17.520	62	20.897	82	28.751	81	23.701	81	February	2016	25 444	108	15.968	77	31.384	112	27,173	111	30.855	111
September	2008	24.964	79	16.509	62	20.028	82	28.292	81	25.788	82	Matels	2016	21 266	109	14.427	77	31.872	112	28,645	111	30.488	112
October	2008	24.546	79	20.783	62	20.981	82	26.998	82	29.726	82	April	2016	26.465	100	20,311	77	34.113	112	29,993	112	29,950	142
November	2008	24.389	79	20.375	62	19.596	83	23-261	82	22.083	82	May	2016	25.192	169	14,554	77	31.826	113	27,882	112	28,771	112
December	2008	23.936	80	18.698	63	19.337	83	25.457	82	31.687	83	June	2016	28.079	110	15,382	78	32.695	113	29,012	112	28,265	113
January	2009	27.448	50	17.482	63	20.815	83	30 202	83	30.813	83	July	2916	27.782	110	18,104	78	33.373	113	29.037	113	26.712	113
February	2009	24.684	50	17.523	63	19.347	84	29,775	83	28.921	83	Angust	2916	27.651	110	16,533	78	32.393	114	30 723	113	29.685	113
March	2009	24.50p	51	15.505	63	18.589	84	27,307	83	31.381	84	September	2016	27.841	111	15,273	78	33.792	114	26.647	113	30.003	114
April	2009	24.759	\$1	19.811	63	18.739	84	29.287	84	34.001	84	Ortober	2016	29.245	111	20.381	78	36 193	114	29,456	114	27.882	114
May	2009	22.499	\$1	16.054	63	20.030	85	27.833	84	30.723	84	November	2016	27.750	111	21.278	78	33.237	115	25,671	114	31.710	114
June	2009	27.280	\$2	16.643	64	18.840	85	29.152	84	31.368	85	December	2016	30.778	112	22.161	79	34 630	115	31,266	114	28.482	115
July August September	2009 2009 2009	26.289 25.006 22.959	82 82 83	15.337 15.682 14.044	64 64 64	18 466 18.198 18.897	85 86 86	27.687 27.712 26.006	85 85 85	33.710 29.665 32.274	85 85 86	January February March	2017 2017 2017	26.384 24.410 24.557	112 112 113	15 457 14,317 12,664	67 67 67	32.794 33.628 33.489	115 116 116	28,030 25,559 29,281	115 115 115	28.530 35.215 30.258	115 115
Ortober	2009	24.637	83	14.412	64	17.674	86	26.106	86	33.583	86	April	2017	25.677	113	13.343	79	35.914	116	27,979	116	30,792	116
November	2009	23.395	83	14.699	64	18.699	87	26.635	86	29.872	86	May	2017	27.259	113	13.248	79	34.165	117	40,776	116	31,200	116
December	2009	19.885	84	16.357	65	18.259	87	30.148	86	33.634	87	June	2017	26.043	114	14.564	80	31.957	117	38,270	116	27,976	117
Jenuary February Marels	2010 2010 2010	25.965 25.727 24.621	84 84 85	16.738 16.056 18.985	65 65	19.873 21.275 22.269	87 86 88	28.790 28.178 26.411	87 87 87	39.151 31.902 33.092	87 87 88	July Anassi September	2017 2017 2017	25.285 24.613 25.109	114 114 115	14.677 14.294 19.375	80 80 80	30.707 30.919 34.909	117 118 118	30,394 27,890 30 863	117 117 117	26.568 27.277 28.353	117 117 118
April	2010	25.8%6	85	17.165	65	22.762	85	31.716	85	39,423	88	October	2017	25.602	115	17.582	80	35.980	118	26,716	118	29.896	116
Mny	2010	25.060	85	16.887	65	25.530	89	32.805	85	32,517	88	November	2017	24.737	115	21.123	80	34.357	119	28,242	118	30.349	115
June	2010	26.848	86	17.196	66	25.690	89	31.756	53	35,331	89	December	2017	25.806	116	14.732	81	34.259	119	27,849	118	30.329	119
July August September	2010 2010 2010	26.317 27.218 24.990	86 86 87	18.178 18.703 19.171	66 66 66	25.909 26 035 24.232	89 90 90	31.182 28.523 24.429	80 80	39.798 31.924 35.523	87 89 90	Jonney February March	2018 2018 2018	31.487 24.675 24.377	116 116 117	15.784 14 173 19.081	81 81 81	40.410 31.217 32.695	119 120 120	28,257 24 417 26,439	119 119 119	28.025 29.460 29.980	119 119 120
October	2010	26.407	87	20.662	66	24,893	90	27.117	90	37.109	90	April	2018	26.283	117	21.019	81	32.2%	120	28,143	120	30.418	120
November	2010	26.666	57	21.777	66	25,345	91	29.378	90	34.065	90	May	2018	30.197	117	15.780	81	31.038	121	33,338	120	30.170	120
Degeniller	2010	27.022	58	19.573	67	25,683	91	29.331	90	38.433	91	Jung	2018	27.354	118	13.872	82	30.336	121	27,222	129	27.684	121
January Felenary March	2011 2011 2011	29.136 25.958 29.087	88 88 89	16.798 16.740	67 67 67	27.062 27.910 26.976	91 92 92	28.619 28.461 30.975	91 91 91	40.515 34.433 36.973	91 91 92	July August September	2018 2018 2018	26.686 27.940 29.056	118 118 119	13.917 14.113 12.953	82 82 62	29.239 31.372 34.948	121 122 122	29.397 30.370 30.804	121 121 121	27.415 27.448 27.542	121
April May June	2011 2011 2011	29.339 28.250 27.832	89 89 90	15.747 16.369 17.305	67 67 68	26.946 24.905 29.536	92 93 93	30.774 31.881 31.557	92 92 92	43.978 34.593 36.617	92 92 93	October November Dreember	2018 2018 2018	26-435 27.691 24.204	119 119 120	10.759 12.686 12.918	82 82 83	32,335 36,504 31,266	122 123	30.741 29.687 28.404	122 122 122	29.999 29.551 28.984	122 122 123
July August September	2011 2011 2011	31-451 28.949 28.408	50 50 91	17.568 17.986 18.269	68 68	29.255 28.442 27.791	93 94 94	36 825 31,232 27,128	93 93 93	37.800 35.610 35.023	93 93 94	January February March	2019 2019 2019	30.530 26.123 26.897	129 120	14.366 14.762 17.431	83 83 83	31.347 28.457 31.421	123 124 124	29.419 26.500 27.621	123 123	29.326 30.169 28.991	123 123 124
October	2011	27.558	91	20.142	68	28.766	94	30.278	94	34.156	94	April	2619	25.594	121	19.356	83	34.101	124	25,467	124	28.693	124
November	2011	28.766	91	19.616	68	30.566	95	28.628	94	34.967	94	May	2019	27.571	121	14.822	83	29.268	125	28,110	124	28.448	124
December	2011	26.691	92	17.589	69	28.416	95	29.004	94	35.743	95	June	2019	27.335	122	11.564	84	28.508	125	26,717	124	27.533	125
January	2012	30.394	92	17.181	69	28.597	95	28.343	95	29.573	95	July	2019	28 209	122	14.454	84	26.575	125	28.479	125	25,998	125
February	2012	29.462	92	16.920	69	29.297	96	26.878	95	27.723	95	August	2019	25.731	122	12.032	84	25.729	126	26.392	125	26,539	125
March	2012	28.690	93	19.052	69	29.722	96	27.188	95	27.919	96	September	2019	26.562	123	12.689	84	28.646	126	27.152	125	26,291	126
April	2012	30.379	93	19.120	69	31.524	96	28.242	96	28.861	96	October	2019	24.114	123	19.518	84	29.860	126	26.212	126	28.829	126
May	2012	30.401	93	14.828	69	30.213	97	30.838	96	27.456	96	Nøvember	2019	21.544	123	17.722	84	29.860	127	27.676	126	28.011	126
June	2012	30.605	94	16.243	70	29.701	97	29.793	96	26.781	97	Dreenber	2019	26.016	124	11.409	85	26.835	127	25.033	126	28.896	127
July	2012	39.509	94	17.145	70	35.113	97	33.010	97	28.243	97	Jamuary	2020	26.864	124	10.987	85	25.755	127	24.481	127	26.646	127
August	2012	29.082	94	16.517	70	29.341	98	27.818	97	28.784	97	February	2020	24.757	124	10.919	85	27.688	128	23 630	127	26.672	127
September	2012	29.848	95	15.550	70	27.939	58	25.748	97	28.926	98	March	2020	24.827	125	8.987	85	26.905	128	21_374	127	26.041	128
October	2012	30.726	95	15.928	70	30.855	98	27.643	98	31.975	95	April	2020	23.371	125	11.337	85	26.252	128	21.644	128	26.045	128
November	2012	30.373	95	(6.195	70	30.705	99	29.119	98	30.425	95	May	2020	22.540	125	11.961	85	25.556	129	24.053	128	26.714	128
December	2012	34.198	96	(6.430	71	29.430	99	28.481	98	31.466	99	June	2029	24 115	126	11.477	86	26.005	129	26.901	128	25.925	129
January February March	2013 2013 2013	30.711 29.757 32.416	96 96 97	17.914 17.017 17.671	71 71 71	29,732 29,298 28,759	69 100 100	28.891 27.903 29.276	90 99 90	32.678 30.967 31.333	99 99 100	July August September	2020 2020 2020	26 857 25 440 22 303	126 126 127	11.665 10.864 13.659	86 86	23.987 26.124 26.131	129 130 130	27_977 25.991 19.097	129 129 129	25.437 24.932 24.619	129 129 130
April	2013	31.695	97	20.385	71	30.248	100	30.441	100	32.686	100	October	2620	23.768	127	13.087	86	29.929	130	28.251	130	26.318	130
May	2013	31.786	97	19.934	71	29.122	101	31.942	100	33.775	100	November	2620	24 622	127	11.624	86	31.287	131	29.694	130	30.687	130
June	2013	33.334	98	17.433	72	29.588	101	32.265	100	29.553	101	December	2520	22 877	128	10.072	87	27.119	131	30.029	130	27.405	131
July August September	2013 2013 2013	33.399 32.052 31.190	98 98	18.665 17.363 15.683	72 72 72	28.960 30.085 30 182	101 102 102	32.283 32.861 27.120	101 101 101	29.274 28.500 27.660	101 101 102	January February March	2621 2021 2021	27.127 29.441 26.233	128 128 129	10.156 12.965 11.377	87 87 87	26 626 39 622 30 181	131 132 132	27.361 32.801 28.966	131 131 131	27.194 26.828 30 896	131 131 132
October	2013	31.548	99	21.742	72	30.331	102	31.098	102	28.817	102	April	2021	28 873	129	14.976	87	32,441	132	31.601	132	30,087	132
November	2013	31.975	99	20.324	72	30.725	103	32.053	102	29.709	102	May	2021	27.837	129	16.225	87	33,832	133	32.142	132	26,700	132
December	2013	32.863	100	18.467	73	33.448	103	32.002	102	28.584	103	June	2021	28.657	130	14.631	88	33,744	133	36.472	132	27,332	133
January	2014	43.923	100	17.821	73	38.669	103	34.595	103	31.372	103	July	2021	30.320	130	17.345	55	33.724	133	32,928	133	26.960	133
February	2014	38.863	100	18.468	73	33.548	104	36.066	103	28.081	103	August	2021	33.622	130	13.616	55	33.114	134	32,003	133	27.180	133
Murch	2014	35.381	101	14.478	73	31.913	104	37.834	103	34.157	104	September	2021	35.364	131	12.272	55	38.295	134	27,616	133	27.722	134
April May June	2014 2014 2014	31.730 33.277 32.242	101 101 102	16.280 15.244 16.754	73 73 74	34.215 32.795 30.676	104 105 105	33.398 35.651 33.714	104 104 104	29.794 27.875 27.178	10-1 10-1 10-5	October November December	2021 2021 2021	40.504 47,159 50.993	131 131	8.267 10.201	66 88	48.759 72.563 47.423	134 135 135	30.620 31.678 31.671	134 134 134	28.672 32.950 34.560	134 134 135
									,			January February March	2022 2022 2022	45.864 37.817				45 097	135	39.166 34.127 42.118	135 135 135	30 303 28.774	135 135
												Autor	4422							42.116	135		

SOUTHERN INDIANA GAS AND ELECTRIC COMPANY Cause No. J8708 FAC-135 Attaclument MDE+1 Page 1 of 1

Attachment MDE-2 Page 1 of 1

SOUTHERN INDLANA GAS AND ELECTRIC COMPANY("CEI SOUTH") Cause No. 38708 FAC-135

						Cause No. 38							
Month	Year	Duke Energy	Indiana Michigan Power	Indianapoli s Power & Light	Ster NIPSCO	rm Generation CenterPoint South	Cost Compar Month	ison Year	Duke Energy	Indiana Michigan Power	Indianapoli s Power & Light	NIPSCO	CenterPoint South
January February March	2007 2007 2007	**	\$17.170 16.302 17.037	\$13.258 13.658 13.241	\$19.628 19.596 19.639	\$20.067 20.069 19.883	July August September	2014 2014 2014		26.952 27.390 21.997	23.416 28.445 30.773	27.969 28.231 28.230	26.762 25.763 26.197
April May June	2007 2007 2007		17.769 18.673 16.973	13,688 13,579 14,096	19.540 20.843 20.389	20.585 20.707 20.182	October November December	2014 2014 2014		25.738 26.728 25.605	32.170 24.532 23.527	27.248 28.011 26.574	26.41 25.47 26.03
July August August	2007 2007 2007		17.916 19.025	14.094 14.530	21.661 20.498	20.429 20.422 20.422	January February	2015 2015		27.191 26.269	23.497 24.232	25.752 25.913	27.281 26.293
September October	2007		20.209 20.572	14.002 14.038	20.295 20.777	19.849 20.904	March April	2015 2015		22.549 22.438	24.195 23.437	25.525 24.555	26.750 26.463
November December	2007 2007 2008		26.158 20.936	13.596 13.583	20.928 21.147 20.253	20.652 21.612 20.948	May June	2015 2015 2015		25.270 27.006 26.312	23.325 25.561 23.672	25.308 26.773 26.544	25,994 26,904
January February March	2008 2008		19.527 20.362 23.903	14.241 14.706 15.223	22.090 22.098	21.970 20.854	July August September	2015 2015		24.397 17.891	23.601 23.741	27.554 26.131	26.387 25.480 26.280
April May June	2008 2008 2008		20.990 22.972 23.708	14.687 15.028 15.694	22.363 22.700 22.885	22.476 22.579 22.903	October November December	2015 2015 2015		25.405 24.520 26.001	23.667 23.089 28.690	26.135 29.840 22.179	26.346 27.464 29.998
fuly August September	2008 2008 2008		23.512 26.033 26.369	15.753 16.174 16.089	22.269 22.720 22.392	21.947 21.701 21.398	January February March	2016 2016 2016		26.382 24.782 12.691	22.756 24.789 23.912	29.902 29.464 29.439	28.590 28.292 29.261
October November December	2008 2008 2008		28.047 26.882 25.630	16.990 16.446 16.200	20.222 21.422 22.406	21.922 21.192 21.476	April May June	2016 2016 2016		24.150 24.981 25.364	23.508 23.653 22.978	29.110 28.551 25.862	27.242 27.164 26.213
January February March	2009 2009 2009		25.582 24.000 20.815	16.107 15.711 15.782	25.922 28.132 26.784	25.786 28.839 29.188	July August September	2016 2016 2016		25.592 26.126 26.854	24.093 23.881 23.757	26.559 25.866 26.956	26.252 26.767 25.976
April May June	2009 2009 2009		23.918 21.705 23.730	15.672 15.793 15.295	26.647 26.314 26.048	30.698 33.507 32.740	October November December	2016 2016 2016		25.295 26.251 25.324	25.603 23.529 24.034	27.421 27.415 26.265	25.344 27.014 26.114
July August September	2009 2009 2009		22.364 20.489 19.544	15.113 15.247 14.968	26.327 25.707 25.708	32.846 33.152 34.242	January February March	2017 2017 2017		24.234 25.272 18.832	23.289 23.028 21.687	26.796 26.318 27.503	25.785 26.177 25.618
October November December	2009 2009 2009		22.783 22.076 22.543	15.046 14.985 15.117	25.820 26.323 27.094	31.128 33.328 33.067	April May June	2017 2017 2017		24.427 24.615 24.941	23.770 23.800 22.189	28.401 29.785 28.828	26.435 25.270 24.834
lanuary February March	2010 2010 2010		21.322 20.569 22.576	15.724 17.057 18.453	27.370 26.853 25.518	31.800 32.762 32.732	July August September	2017 2017 2017		24.333 24.583 24.531	22.378 23.027 23.494	27.586 26.420 25.583	25.042 25.339 26.558
April May	2010 2010 2010 2010		22.109 22.244	18.843 19.988	26.032 25.762 27.820	33.361 34.854 32.529	October November December	2017 2017 2017 2017		20.555 24.661 23.847	24.385 23.090 23.840	24.418 27.061 25.733	26.092 26.360 26.961
lune luly August	2010 2010		22.853 24.191 25.663	20.389 20.687 21.080	32.402 26.834	33.720 33.480	January February	2018 2018		23.180 25.057	22.415 22.815	26.382 28.280	26.764 26.907
September Detober November	2010 2010 2010		24.650 22.395 22.491	20,705 21,082 21,118	26.115 26.942 26.585	34.401 34.857 35.410	March April May	2018 2018 2018		20.209 24.048 23.933	22.083 21.120 22.590	26.959 27.127 24.337	26.650 25.571 26.095
December January February	2010 2011 2011		22.659 20.956 22.068	20.555 20.753 21.425	28.795 27.896 28.394	35.591 35.043 35.582	June July August	2018 2018 2018		25.669 25.526 24.755	21.705 21.817 22.268	24.064 25.030 27.141	26.090 25.669 25.227
March April May	2011 2011 2011		24.766 23.263 23.302	21.651 22.169 21.442	29.036 29.308 28.825	36.068 37.562 35.813	September October November	2018 2018 2018		26.052 18.367 24.338	21.867 21.395 23.050	26.613 26.252 25.631	25.42 25.82 25.80
June July August	2011 2011 2011		23.935 24.189 23.782	22.420 22.527 23.009	29.311 29.875 29.334	35.859 36.551 35.493	December January February	2018 2019 2019		25.841 27.252 28.353	21.380 21.678 21.415	24.654 26.527 27.631	26.22 26.31 26.19
September October November	2011 2011 2011		23.088 23.970 23.311	22.088 22.163 22.263	27.931 27.925 26.560	36.721 37.020 38.509	March April May	2019 2019 2019		22.088 26.536 27.450	22.505 21.771 22.668	25.570 24.720 24.365	24.653 24.620 24.98
December January February	2011 2012 2012		21.902 21.278 21.571	22.376 21.584 22.496	26.644 26.283 24.679	38.877 27.727 26.060	June July August	2019 2019 2019		28.017 25.638 26.093	21.700 20.550 20.107	24.427 24.218 23.645	25.73 24.450 24.930
March April	2012 2012		26.117 21.401	21.941 23.745	24.520 24.526	25.741 26,097	September October November	2019 2019		26.601 26.979	20.371 19.891	23.086 24.856	24.47 25.01
May June July	2012 2012 2012		21.419 22.167 22.455	23.965 22.958 25.210	25.157 26.526 27.584	26.037 25.572 25,854	December January	2019 2019 2020		27.029 27.624 39.156	20.701 19.249 20.278	24.098 23.921 24.143	24.90 25.98 24.71
August September	2012 2012 2012		22.751 21.266 21.222	24.524 23.399	27.429 26.974 26.595	26.735 28.336 28.630	February March	2020 2020 2020		27.154 15.799 25.067	19.399 18.525 (0.211)	25.026 25.307 26.145	25.62 26.13 27.70
October November December	2012 2012		22.161 22.868	23.124 22.904 22.894	25.797 25.730	28.008 29.143	April May June	2020 2020		27.314 27.210	37.614 19.931	30.549 27.363	26.22 25.00
January February March	2013 2013 2013		24.306 25.587 25.487	23.140 22.911 22.800	28.319 27.123 27.074	29.340 28.796 28.431	July August September	2020 2020 2020		27.938 27.166 28.022	19.821 20.531 19.618	24.607 23.200 23.573	24.80 25.16 25.34
April May June	2013 2013 2013		24.394 26.229 26.294	23.318 22.910 24.314	28.563 28.938 28.394	29.049 28.567 28.089	October November December	2020 2020 2020		0.507 28.331 0.000	24.045 20.884 19.269	24.194 24.650 27.295	25.05 25.50 24.80
July August September	2013 2013 2013		25.817 25.693 23.863	23.734 24.479 23.218	28.072 27.054 26.685	28.035 28.219 28.022	January February March	2021 2021 2021		120.491 28.541 43.462	19.069 19.566 19.445	26.999 28.005 26.299	25.07 25.81 25.18
October November December	2013 2013 2013		26.216 25.848 26.081	23.472 23.232 24.007	26.844 27.822 27.499	27.719 28.231 28.142	April May June	2021 2021 2021		32.723 29.301 29.334	19.814 20.725 20.845	26.911 26.446 30.644	25.02 25.55 66.34
January February March	2014 2014 2014		25.529 27.393 23.107	24.550 24.538 23.463	29.414 32.326 31.978	28.097 28.048 27.154	July August September	2021 2021 2021		33.447 32.115 33.527	20.500 20.276 20.888	26.197 23.566 24.586	25.34 25.61 24.75
April May June	2014 2014 2014		26.567 28.489 27.603	24.278 24.487 23.021	29.116 29.296 28.575	28.722 26.666 27.346	October November December	2021 2021 2021		0.000 0.000	21.707 26.967 23.709	25.422 28.611 37.660	25.37 26.12 27.59
				ons of the identi			January February March	2022 2022 2022			25.191	36.726 35.258 37.777	26.44 27.05

#### SOUTHERN INDIANA GAS AND ELECTRIC COMPANY ("CEI SOUTH") 38708 FAC 135

#### June 2022 Residential Customer Bill using 1,000 kWh

Description:	kWh	Rate	\$	% of Bill
Customer Charge			¢11.00	6.63%
	1 000	\$0.001600		55.18%
				23.43%
		•		23.43 %
				-3.04%
,		· · · · · · · · · · · · · · · · · · ·	· · ·	-5.04 <i>%</i> 5.49%
e ,	•			1.32%
, , , , , , , , , , , , , , , , , , ,	•	•		4.15%
,	· · ·	•		4.13 <i>%</i> 2.63%
,				2.03 <i>%</i> 0.02%
	1,000	φ <b>0.00003</b> 4	0.03	0.02 /6
System Improvement Charge	1,000	\$0.002212	2.21	1.33%
Total Billing Amount (Excluding Taxes)			165.99	100.00%
Base Charge (Line 1, 2,3 and 4)			\$146.24	88.10%
Non-FAC Trackers (Lines 6, 7, 8, 9, 10, & 11)			24.79	14.94%
FAC (Line 5)			(5.04)	-3.04%
Total			\$165.99	100.00%
	Customer Charge Energy Charge Fuel Charge Variable Production Charge Fuel Adjustment Clause Demand Side Management Adjustment Clean Energy Cost Adjustment Envrionmental Cost Adjustment MISO Cost and Revenue Adjustment Reliability Cost and Revenue Adjustment Transmission, Distribution, and Storage System Improvement Charge Total Billing Amount (Excluding Taxes) Base Charge (Line 1, 2,3 and 4) Non-FAC Trackers (Lines 6, 7, 8, 9, 10, & 11) FAC (Line 5)	Customer ChargeEnergy Charge1,000Fuel Charge1,000Variable Production Charge1,000Fuel Adjustment Clause1,000Demand Side Management Adjustment1,000Clean Energy Cost Adjustment1,000Envrionmental Cost Adjustment1,000MISO Cost and Revenue Adjustment1,000Reliability Cost and Revenue Adjustment1,000Transmission, Distribution, and StorageSystem Improvement ChargeSystem Improvement Charge1,000Total Billing Amount (Excluding Taxes)Base Charge (Line 1, 2,3 and 4)Non-FAC Trackers (Lines 6, 7, 8, 9, 10, & 11)FAC (Line 5)	Customer Charge Energy Charge 1,000 \$0.091600 Fuel Charge 1,000 \$0.038890 Variable Production Charge 1,000 \$0.004750 Fuel Adjustment Clause 1,000 (\$0.005039) Demand Side Management Adjustment 1,000 \$0.009106 Clean Energy Cost Adjustment 1,000 \$0.002189 Envrionmental Cost Adjustment 1,000 \$0.006884 MISO Cost and Revenue Adjustment 1,000 \$0.004367 Reliability Cost and Revenue Adjustment 1,000 \$0.00034 Transmission, Distribution, and Storage System Improvement Charge 1,000 \$0.002212 Total Billing Amount (Excluding Taxes)	Customer Charge       \$11.00         Energy Charge       1,000       \$0.091600       91.60         Fuel Charge       1,000       \$0.038890       38.89         Variable Production Charge       1,000       \$0.004750       4.75         Fuel Adjustment Clause       1,000       \$0.009106       9.11         Clean Energy Cost Adjustment       1,000       \$0.002189       2.19         Envrionmental Cost Adjustment       1,000       \$0.004367       4.37         Reliability Cost and Revenue Adjustment       1,000       \$0.004367       4.37         Reliability Cost and Revenue Adjustment       1,000       \$0.00034       0.03         Transmission, Distribution, and Storage       System Improvement Charge       1,000       \$0.002212       2.21         Total Billing Amount (Excluding Taxes)       165.99       165.99         Base Charge (Line 1, 2,3 and 4)       \$146.24       \$146.24         Non-FAC Trackers (Lines 6, 7, 8, 9, 10, & 11)       24.79       5.04)         FAC (Line 5)       (5.04)       5.04

Note: Per online tariffs as of June 20, 2022, https://www.vectren.com/information/rates

### **AFFIRMATION**

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

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By: Michael D. Eckert Director of the Electric Division Indiana Office of Utility Consumer Counselor

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Cause No. 38708 FAC-135 CEI South

Date: June 20, 2022

#### **CERTIFICATE OF SERVICE**

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

Public's Exhibit No. 2 Testimony of OUCC Witness Michael D. Eckert has been served upon the

following counsel of record in the captioned proceeding by electronic service on June 20, 2022.

Heather A. Watts Jeffrey A. Earl **CENTERPOINT ENERGY, INC.** <u>heather.watts@centerpointenergy.com</u> jeffrey.earl@centerpointenergy.com Steven W. Krohne Kelly M. Beyrer ICE MILLER LLP steven.krohne@icemiller.com kelly.beyrer@icemiller.com

Foriaine Hitz

Lorraine Hitz Deputy Consumer Counselor

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR 115 West Washington Street Suite 1500 South Indianapolis, IN 46204 <u>infomgt@oucc.in.gov</u> 317/232-2775 -Lorraine's Direct Line 317/232-2494 – Phone 317/232-5923 – Facsimile