

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN POWER)
COMPANY, AN INDIANA CORPORATION, FOR)
AUTHORITY TO INCREASE ITS RATES AND)
CHARGES FOR ELECTRIC UTILITY SERVICE)
THROUGH A PHASE IN RATE ADJUSTMENT; AND)
FOR APPROVAL OF RELATED RELIEF INCLUDING:)
(1) REVISED DEPRECIATION RATES; (2))
ACCOUNTING RELIEF; (3) INCLUSION OF CAPITAL)
INVESTMENT; (4) RATE ADJUSTMENT)
MECHANISM PROPOSALS; (5) CUSTOMER)
PROGRAMS; (6) WAIVER OR DECLINATION OF)
JURISDICTION WITH RESPECT TO CERTAIN)
RULES; AND (7) NEW SCHEDULES OF RATES,)
RULES AND REGULATIONS.)

CAUSE NO. 45576

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 8

PUBLIC (REDACTED) TESTIMONY OF

OUCW WITNESS JOHN E. HASELDEN

OCTOBER 12, 2021

Respectfully submitted,



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TESTIMONY OF OUCC WITNESS JOHN E. HASELDEN
CAUSE NO. 45576
INDIANA MICHIGAN POWER COMPANY

I. INTRODUCTION

1 **Q: Please state your name, business address, and employment capacity.**

2 A: My name is John E. Haselden. My business address is 115 West Washington Street,
3 Suite 1500 South, Indianapolis, Indiana 46204. I am a Senior Utility Analyst in the
4 Electric Division of the Indiana Office of Utility Consumer Counselor ("OUCC").
5 I describe my educational background, professional work experience, and
6 preparation for this filing in Appendix A to my testimony.

7 **Q: Have you previously testified before the Indiana Utility Regulatory**
8 **Commission ("Commission")?**

9 A: Yes. I have testified in many proceedings on several issues before the Commission,
10 including rate cases, demand side management, renewable energy, environmental
11 trackers, and applications for Certificates of Public Convenience and Necessity.

12 **Q: What is the purpose of your testimony?**

13 A: I discuss how Indiana Michigan Power Company's ("I&M" or "Petitioner") request
14 for recovery of costs associated with the Crossroads Electric Vehicle ("EV")
15 Corridor ("Crossroads") project is inappropriate, likely unnecessary, and not in
16 ratepayers' interest. I recommend the Commission deny recovery of the proposed
17 Crossroads EV charging stations costs.

18 **Q: Please describe the review and analysis you conducted to prepare your**
19 **testimony.**

20 A: I reviewed the Verified Petition, Direct Testimony and Exhibits I&M submitted in
21 this Cause. I drafted data requests ("DRs") and reviewed I&M's responses. I also

1 reviewed the Indiana Department of Environmental Management's ("IDEM")
2 Request for Proposals ("RFP") for statewide fast chargers.¹

3 **Q: Are you sponsoring any attachments in this proceeding?**

4 A: Yes. I sponsor:

- 5 • Attachment JEH-1 to this testimony, which contains Petitioner's responses
6 to selected OUCC DRs;
- 7 • Attachment JEH-1c to this testimony, which contains Petitioner's
8 confidential responses to selected OUCC DRs; and
- 9 • Attachment JEH-2 to this testimony, which is the RFP issued by IDEM for
10 EV charging infrastructure.

11 **Q: To the extent you do not address a specific item in your testimony, should it be
12 construed to mean you agree with I&M's proposal?**

13 A: No. My silence regarding any topics, issues or items I&M proposes does not
14 indicate my approval of those topics, issues, or items. Rather, the scope of my
15 testimony is limited to the specific items addressed herein.

II. I&M'S PROPOSED CROSSROADS PROJECT INVESTMENT

16 **Q: Why is I&M proposing to install EV charging stations?**

17 A: As Petitioner's witness Jon C. Walter explains, I&M is part of a group of Indiana
18 electric utilities responding to IDEM's RFP.² Mr. Walter notes part of IDEM's
19 goals in utilizing the Volkswagen Trust funds are to:

- 20 • Develop a statewide EV charging network providing EV charging locations to
21 the greatest number of citizens; and
- 22 • Create a diverse statewide network to meet Indiana citizens' needs using both
23 Direct Current Fast Chargers ("DCFC") and L2 charging equipment.³

¹ See Attachment JEH-2.

² Direct Testimony of Jon C. Walter, pages 39- 41,

³ Attachment JEH-2, page 4.

1 IDEM awarded grants to the joint group of Indiana utilities to partially fund the
2 proposed network of DCFCs. I&M calls its DCFC network the Crossroads EV
3 Corridor.

4 **Q: What is I&M requesting in this proceeding regarding its participation in the**
5 **Crossroads project?**

6 A: I&M estimates it will invest \$3,586,900 in EV Crossroads offset by \$1,080,000 of
7 IDEM grant funding for a net investment of \$2,506,900.⁴ However, I&M does not
8 recognize IDEM's grant funding in its revenue requirement and seeks to recover
9 \$3,783,088 of capital investment in base rates.⁵ I&M does not yet have firm cost
10 estimates for the EV charging stations and proposes the Commission determine
11 how ongoing maintenance costs and user revenues are treated in a future
12 proceeding.⁶

13 **Q: Does the OUCC oppose the concept of a statewide network of DCFCs?**

14 A: No. Such a system may have broad public benefits. If it does, the costs of a
15 statewide DCFC system should be supported by all its beneficiaries and/or paid for
16 by the market for such services. In this proceeding, the OUCC is concerned that the
17 net cost of I&M's portion of the statewide DCFC infrastructure is placed directly
18 on its ratepayers without a commensurate showing of ratepayer benefit and despite
19 the fact that I&M's Crossroads EV is not sufficiently related to the provision of
20 utility service.

21 **Q: What customer benefits does I&M claim will accrue as a result of installing**
22 **Crossroad EV charging stations?**

⁴ Walter, page 41, line 24 through page 42, line 7.

⁵ Attachment JEH-1, Response to OUCC DR 19-03.

⁶ Walter, page 44, lines 12-23.

- 1 A: I&M sets out three benefits⁷:
- 2 1. I&M customers who already own or use EVs will benefit from the increased
- 3 number of EV charging locations throughout the state;
- 4 2. All I&M customers will benefit from reduced tailpipe emissions, and;
- 5 3. Better availability of EV charging infrastructure will reduce “range anxiety”
- 6 among EV drivers, resulting in increases in EV usage. This will promote more
- 7 EV adoption and further reduce tailpipe emissions from internal combustion
- 8 engine vehicles.

III. OUCC CONCERNS

9 **Q: What are your concerns about I&M’s customers funding the Crossroads EV**

10 **charging stations?**

- 11 A: The OUCC has a number of concerns:
- 12 1. The burden of paying for the Crossroads EV charging stations unfairly falls on
- 13 all I&M customers, more than 99% of whom do not have an EV and will not
- 14 use the proposed infrastructure⁸;
- 15 2. There is no Indiana policy promoting statewide EV charging infrastructure. If
- 16 there were, it stands to reason the Indiana General Assembly would provide
- 17 funding to implement a statewide program based on its consideration of the
- 18 program’s general public benefit;

⁷ Walter, page 43, lines 8-16.

⁸ Attachment JEH-1, Response to OUCC DR 26-1 through 5.

- 1 3. Although users will pay an undefined amount for charging their vehicles, it is
2 evident the revenue will not cover I&M's revenue requirements for the EV
3 charging stations for many years.⁹ I&M customers subsidize all users.
- 4 4. I&M's EV Crossroads business case is flawed, considers no sensitivities to
5 assumptions, and without the IDEM grant funding, the net present value of the
6 EV Crossroads project would be much lower, making the project obviously
7 unsustainable. I&M's EV Crossroads business case does not include all costs
8 associated with the project. Missing from I&M's business case analysis are
9 increased transmission and distribution ("T&D") capacity costs and the cost of
10 energy supplied for charging. Including these costs would put the analysis in a
11 negative net present value position, despite the extremely optimistic assumption
12 of an approximate [REDACTED] % compounded average growth rate in charging activity.¹⁰
- 13 5. The Crossroads EV charging stations are new, uncontrolled load that will add
14 on-peak generation T&D capacity costs to I&M customers. Consequently,
15 Crossroads EV does not contribute to energy utility efficiency;
- 16 6. If the Crossroads EV charging stations costs are included in rates, low-income
17 customers will be disproportionately affected financially, which is particularly
18 troubling when these customers are less likely to use the charging services.
19 Similar concerns were noted in Cause No. 44478 ("BlueIndy")¹¹;

⁹ Attachment JEH-1C, Response to OUCC DR 26-6, Confidential Attachment 1.

¹⁰ I&M has estimated first year charging sessions at [REDACTED] and growing to over [REDACTED] in six years. See Confidential Attachment JCW-9.

¹¹ Order, Cause No. 44478, page 23.

1 7. Crossroads EV is not sufficiently related to the provision of safe, reliable, and
2 affordable electric utility service to warrant cost recovery by ratepayers;

3 8. Even though revenues from the Crossroads EV chargers are not expected to be
4 sufficient to satisfy the 30-month revenue criterion for line extensions to service
5 the chargers, I&M requests that it recover what it estimates its distribution
6 service costs will be through rates.¹² These estimated costs should be at I&M's
7 expense.

8 9. Pending federal legislation (HB 3684) contains approximately \$7.5 billion of
9 funding for EV charging infrastructure to be administered nationwide.
10 Customers would be best served by I&M making use of Indiana's share of this
11 federal funding. It is premature to saddle I&M customers with this cost burden
12 before the fate of the federal legislation is known.

13 **Q: Did the IDEM RFP for Volkswagen Trust funding require the joint utility**
14 **applicants to gain Commission approval to pass the net costs to their**
15 **customers?**

16 **A:** No. Nor did applicants' response to the RFP contain the condition that Commission
17 approval to pass costs to ratepayers was required.¹³

18 **Q: To date, have any other members of the joint utility applicants¹⁴ requested**
19 **recovery for Crossroads EV costs from customers through any proceedings**
20 **before the Commission?**

¹² 170 IAC 4-1-27(C)

¹³ Walter, Attachment JCW-6.

¹⁴ The Indiana Utility Group includes Duke Energy Indiana, Hoosier Energy REC, Inc. Indiana Michigan Power, Indianapolis Power & Light Company, Northern Indiana Public Service Company, Vectren, a CenterPoint Energy Company, and Wabash Valley Power Alliance.

1 A: No. I am aware Duke Energy Indiana intends to file for Commission approval of a
2 new rate for company-owned public chargers that may be part of its portion of the
3 Crossroads EV Corridor.¹⁵

4 **Q: What concern do you have regarding I&M owning the proposed EV charging**
5 **stations?**

6 A: If I&M carried the cost of owning its Crossroads EV charging stations below-the-
7 line (i.e., without ratepayer funding), I would have no concern. However, based on
8 I&M's proposal to fund its portion of the Crossroads EV Corridor through rates,
9 my primary concern about I&M's direct ownership of the EV charging stations is
10 that customers are subsidizing these costs with I&M shareholders bearing no risk.
11 I&M has based this ratepayer burden on an inadequate business plan, which shows,
12 if all costs are considered, it has no expectation of profitability from Crossroads EV
13 other than to earn a return on the investment at the expense of customers.¹⁶ Not
14 only would customers pay for the EV Crossroads project costs, customer rates
15 would also reflect increased system capacity costs. Any reduction in tailpipe
16 emissions is not an adequate benefit to justify placing EV Crossroads costs on I&M
17 customers specifically. All this for a project that is not sufficiently related to the
18 provision of electric utility service.

¹⁵ Cause No 45616.

¹⁶ Attachment JEH-1, Response to OUCC DR 26-6, Confidential Attachment 1.

IV. RECOMMENDATIONS

1 **Q: What does the OUCC recommend?**

2 A: The OUCC recommends the Commission deny I&M's request to include the
3 Crossroads EV costs in base rates. This results in a revenue requirement adjustment
4 of \$3,783,088¹⁷.

5 If I&M wishes to proceed with its portion of the EV Crossroads Corridor
6 project, its costs should be accounted for below-the-line with no ratepayer funding.
7 Further, line extensions to service Crossroads EV charging stations should be at
8 I&M's cost, unless and until I&M can show the Commission's 30-month revenue
9 test is satisfied.¹⁸

10 **Q: Does this conclude your testimony?**

11 A: Yes.

¹⁷ Attachment JEH-1, Response to OUCC DR19-3.

¹⁸ 170 Ind. Admin. Code 4-1-27(C).

APPENDIX TO TESTIMONY OF
OUCC WITNESS JOHN E. HASELDEN

1 **Q: Please describe your educational background.**

2 A: I am a graduate of Purdue University with a Bachelor of Science degree in Civil
3 Engineering. I am also a graduate of Indiana University with the degree of Master of
4 Business Administration, majoring in Finance. I am a registered Professional Engineer in
5 the State of Indiana. I have attended and presented at numerous seminars and conferences
6 on topics related to demand-side management (“DSM”) and renewable energy.

7 **Q: Please describe your utility business experience.**

8 A: I began employment with Indianapolis Power & Light Company in April, 1982 as a Design
9 Project Engineer in the Mechanical-Civil Design Engineering Department. I was
10 responsible for a wide variety of power plant projects from budget and cost estimation
11 through the preparation of drawings, specifications, purchasing and construction
12 supervision.

13 In 1987, I became a Senior Engineer in the Power Production Planning Department.
14 I was responsible for assisting and conducting studies concerning future generation
15 resources, economic evaluations, and other studies.

16 In 1989, I was promoted to Division Supervisor of Fuel Supply and in 1990, became
17 Director of Fuel Supply. I was responsible for the procurement of the various fuels used at
18 IPL’s generating stations.

19 In 1993, I became Director of Demand-Side Management. I was responsible for the
20 development, research, implementation, monitoring, and evaluation of all marketing and

1 DSM programs. In particular, I was responsible for the start-up of this new department and
2 for the start-up and implementation of the DSM programs approved by the Commission in
3 its Order in Cause 39672 dated September 8, 1993. The DSM Department was dissolved
4 at IPL in 1997 and I left the company.

5 From 1997 until May, 2006, I held the positions of Director of Marketing and later,
6 Director of Industrial Development and Engineering Services at The Indiana Rail Road
7 Company. I was responsible for the negotiation of coal transportation contracts with several
8 electric utilities, supervision of the Maintenance-of-Way and Communications and Signals
9 departments, project engineering, and development of large capital projects.

10 I rejoined IPL in May, 2006 as a Principal Engineer in the Regulatory Affairs Department.
11 I was responsible for the evaluation and economic analysis of DSM programs and assisted
12 in the planning and evaluation of environmental compliance options and procurement of
13 renewable resources.

14 In May, 2018, I joined the OUCC as a Senior Utility Analyst - Engineer. I review
15 and analyze utilities' requests and file recommendations on behalf of consumers in utility
16 proceedings. As applicable to a case, my duties may also include evaluating rate design
17 and tariffs, examining books and records, inspecting facilities, and preparing various
18 studies.

19 **Q: Have you previously testified before the Indiana Utility Regulatory Commission?**

20 A: Yes. I have provided testimony in several proceedings on behalf of IPL regarding the
21 subjects of Fuel Supply, DSM and renewable energy most recently in Cause Nos. 43485,
22 43623, 43960, 43740, 44328, 44018, and 44339. My testimony on DSM concentrated on

1 the evaluation, measurement and verification (“EM&V”) of DSM programs. My
2 testimony on renewable energy concentrated on IPL’s Rate REP (feed-in tariff, wind
3 power purchase agreements and solar energy. I have provided testimony on behalf of the
4 OUCC in Cause Nos. 43955 (DSM-7 and 8), 43827 (DSM-8 and 9), 43623 (DSM-19),
5 43405 (DSMA-17), 45086, 45145, 45193, 45194, 45235, 45245, 45253, 45285, 45370,
6 45387, 45465, 45485, 44733 (TDSIC-5, 7 and 8), 44910 (TDSIC-4, 6, 7 and 8), and
7 45506.

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DATA REQUEST SET NO. OUCC DR 19
IURC CAUSE NO. 45576

DATA REQUEST NO OUCC DR OUCC 19-01

REQUEST

See Walter Direct at p. 39, lines 3-6. I&M is proposing to recover capital costs net of grant funding for its Corridor Project EV chargers. Please respond to the following and provide support for your responses:

- a. Has I&M projected how many I&M customers and non-I&M users are expected to use the Corridor Project facilities to charge their electric vehicles each year for any period? If "yes," please provide your study or projections. If "no," please explain why I&M has not made these projections.
- b. If I&M projects more non-I&M users will use the Corridor Project chargers, please explain why I&M seeks full recovery from its ratepayers.
- c. If I&M projects more I&M customers will use the Corridor Project chargers, please explain.
- d. Is I&M planning to offset these capital costs with proceeds from non- I&M users' charging fees? If "no," please explain why and provide support for your response.

RESPONSE

a. Please see Confidential Attachment JCW-9 filed as part of I&M's case-in-chief. I&M did not perform a specific calculation to project a distinction between how many I&M customers and non-I&M users are expected to use Corridor Project facilities.

I&M did not perform this projection because the Company's projection for the number of annual site charging sessions is based on information provided by its proposed Crossroads EV Corridor equipment and services vendor using their actual regional experience as the basis for charging session use and growth. This information is neither Indiana-specific nor I&M-service territory specific. While the Company expects that I&M customers will use the EV charging stations proposed for cost recovery, the goal of the IDEM RFP is broader than I&M customer use only and therefore does not solely rely on I&M customer use for justification.

Instead, Confidential Attachment JCW-9 provides a Compound Annual Growth Rate (CAGR) comparison between forecast EV adoption in I&M service territory and the CAGR of the "Forecast Estimated Average Charging Sessions per site per day" data also presented on the same attachment. The "Base" forecast for I&M customer EV adoption growth is similar to the Base forecast for average site charging sessions per day growth on I&M's Crossroads EV chargers (29%

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versus 26%). This similarity in growth rates demonstrates that I&M customers are forecasted to grow in their use of these EV chargers at a similar rate to non-I&M users.

b. I&M objects to this question on the grounds and to the extent that the request mischaracterizes I&M's request in this proceeding as I&M is not requesting full recovery from its customers. Instead, as discussed in the responses to Q71 through Q74 of Company witness Walter's direct testimony, I&M is requesting cost recovery for the EV charging equipment costs net of IDEM grant funds. I&M will also flow back revenues associated with the use of the chargers to I&M customers to provide an offset to the costs of the program. In addition, please see the response to subpart a above. I&M projects similar growth in I&M customer EV adoption and Corridor Project charger use.

I&M's proposal in this case is one component of a broader, statewide Crossroads EV Corridor project approved for grant funding under IDEM's VW DC Fast Charger Corridor project. While non-I&M users may use the Crossroads EV Corridor DC fast chargers in I&M's service area, I&M customers will also have the ability to utilize the Crossroads EV Corridor DC fast chargers in the service areas of other Indiana utilities. The broader goal of this state-wide project is to advance the use of the EVs across the state by providing access to DC fast charging infrastructure.

c. Please see the response to subpart a above. I&M expects I&M customer growth in the use of Crossroads EV Corridor EV chargers but did not calculate a specific I&M customer/non-user split.

I&M anticipates that I&M customer EV owners will have increased opportunity to use these EV charging stations for charging while they are travelling either locally or regionally as the broader, statewide Crossroads EV Corridor project is fully deployed.

d. Yes. I&M is in the process of preparing its Crossroads EV Corridor Project implementation plan. Specifically, the Company is securing site agreements and drafting an RFP that will be issued later this year for the EV DC fast charging equipment as well as retail charging services.

Once the results of that RFP are received and the vendor is selected, I&M will develop its proposed Crossroads EV Corridor Charging tariff to establish the electric rate that will be assessed for charging sessions at the Company's Crossroads EV Corridor locations. As part of that tariff proposal, I&M will fully support the expected transaction cost, revenue sharing proposal and proposed tariff terms, conditions and rates.

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DATA REQUEST NO OUCC DR 19-02

REQUEST

See Walter Direct at p. 44, lines 11-14. Please explain why I&M is asking the Commission to determine revenue treatment for ratemaking purposes in a future proceeding rather than this proceeding.

RESPONSE

I&M has included in this proceeding the capital expenditures that are included in 2021 – 2022 Capital Forecast Period. The capital expenditures are based on reasonable estimates of the EV DC fast charging equipment and supporting infrastructure and are consistent with the estimates used in I&M's response to the IDEM RFP.

In order for I&M to finalize the revenue treatment proposal, it is necessary for I&M to complete the vendor selection for the EV DC fast charging equipment and retail charging service. Once the vendor is selected and contractual terms, such as transaction costs are established, I&M will have the information necessary to develop its proposed Crossroads EV Corridor Charging tariff to establish the electric rate that will be assessed for charging sessions at the Company's Crossroads EV Corridor locations. As part of that tariff proposal, I&M will support the expected transaction cost, revenue sharing proposal and proposed tariff terms, conditions and rates.

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DATA REQUEST SET NO. OUCC DR 19
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DATA REQUEST NO OUCC DR 19-03

REQUEST

See Walter Direct at p. 40, lines 19-22, which states "I&M proposed to fund the costs associated with installing, interconnecting, operating, and maintaining the twelve corridor fast charging sites in excess of the costs covered by VW mitigation grant funds." Please respond to the following:

- a. Will I&M's shareholders fund these costs or is I&M expecting its ratepayers to fund these costs? Please explain.
- b. To the extent I&M seeks to recover these costs in this proceeding, identify the proposed adjustment and related testimony and workpapers I&M filed in this Cause to support its request.

RESPONSE

a. Please see the answer to Q73 in Company witness Walter's direct testimony in this filing, page 42, lines 13-14. The Company proposes to include in Electric Plant In-Service the cost of EV charging station equipment installation and interconnection.

Please also see the answer to Q78 in Company witness Walter's direct testimony in this filing, page 44, lines 17-22. The Company proposes incremental operation and maintenance costs for the first 5 years of equipment operation to be included as part of the capital costs of the project.

b. The capital costs associated with the twelve corridor fast charging sites are included in the capital forecast for this cause. Specifically, they are included in line item IMINEVVWS: IN DCFC Stations VW EV Funds as \$3,783,088 in WP-DAL-2. There are no adjustments associated with this proposal in this case.

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DATA REQUEST SET NO. OUCC DR 26
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DATA REQUEST NO OUCC 26-01

REQUEST

How many Electric Vehicles does I&M estimate are in its Indiana service territory?

RESPONSE

The most recent data available (as of March 31, 2021) indicates there are a total of 2,316 electric vehicles registered in I&M's Indiana service territory. To determine the number of electric vehicles within I&M's service territory, the Company matched the Department of Motor Vehicle registration data by zip code with the premise zip codes from Company's customer accounting billing system.

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DATA REQUEST SET NO. OUCC DR 26
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DATA REQUEST NO OUCC 26-02

REQUEST

How many I&M customers currently participate in Tariff RS-PEV?

RESPONSE

As of August 2021 - 28 Tariff RS-PEV accounts.

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DATA REQUEST NO OUCC 26-03

REQUEST

How many I&M customers currently participate in Tariff GS-PEV?

RESPONSE

As of August 2021 - 1 GS PEV account.

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DATA REQUEST NO OUCC 26-04

REQUEST

How many residential customers does I&M serve in Indiana?

RESPONSE

As of August 2021 - 414,347 Residential accounts.

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DATA REQUEST NO OUCC 26-05

REQUEST

How many Commercial/Industrial customers does I&M serve in Indiana?

RESPONSE

As of August 2021 - 58,041 C&I accounts.

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IURC CAUSE NO. 45576

DATA REQUEST NO OUCC 26-06

REQUEST

Please provide any business case documents justifying I&M's investment in charging stations proposed for the Crossroads EV Corridor project.

RESPONSE

I&M objects to the request on the grounds and to the extent the request seeks information that is confidential, proprietary, competitively sensitive, and/or trade secret. Subject to and without waiver of the foregoing objection, I&M provides the following response, with the confidential information being provided pursuant to the nondisclosure agreement between the parties.

Please see 45576_IndMich_OUCC 26-6_Confidential Attachment 1_09272021 and 45576_IndMich_OUCC 26-6_Confidential Attachment 2_09272021.

Please see the Company's response to OUCC 19-01 subpart d, which explains the Company's evolving process for the Crossroads EV Corridor implementation plan. As this process continues to evolve, the business case underlying the Company's proposal will evolve as well.

45576_IndMich_OUCC 26-6_Confidential Attachment 1_09272021 and 45576_IndMich_OUCC 26-6_Confidential Attachment 2_09272021 are business case documents that reflect information and data known at the time of the Company's filing in this cause. The information contained in these documents also reflect data and information obtained by the Company through a relationship with a third party vendor that supplies both DC fast charging equipment and retail charging services and has knowledge of the current retail market rates for EV DCFC charging service. The Company relied on this vendor relationship to develop its initial estimates for project cost, anticipated charging use, and a market-based electricity cost rate to determine estimated electric revenues.

45576_IndMich_OUCC 26-6_Confidential Attachment 1_09272021 contains the Company's current estimate for the underlying business case that reasonably supports and prudently justifies the investment in the Crossroads EV Corridor Project. This attachment provides updated information to the original Confidential Attachment JCW-9 filed in this Cause. In the tab entitled "Crossroads Cost & Revenue", the 10-year annual Estimated I&M Charging Revenue is updated to annually offset the 10-year annual cost of service revenue requirement but still uses the \$0.30 per kWh retail market-based electricity rate.

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The line entitled "Estimated I&M Charging Revenue less Estimated Revenue Requirement" sets forth the Company's current estimate for how I&M's customers may realize the Estimated I&M Charging Revenue credit.

The second tab of 45576_IndMich_OUCC 26-6_Confidential Attachment 1_09272021, entitled "EV Crossroads RR Schedule", provides the Company's current estimate for the Total Revenue Requirement that is comprised of the estimated Capital Annual Revenue Requirement-Fixed Cost and the estimated Variable Energy Production Cost-Annual Revenue Requirement. The Total Annual Revenue Requirement annual cost is used in the first tab (Crossroads Cost & Revenue) for the Estimated I&M Charging Revenue less Estimated Revenue Requirement annual calculation.

45576_IndMich_OUCC 26-6_Confidential Attachment 2_09272021 are business case options obtained by the Company through its third party vendor relationship. In this document, the third party vendor provides several data points used by the Company in its business case documents discussed above, including the market-based retail EV Market Rate for Charging Session of \$0.30 per kWh. While informative to the Company, these overall business case estimates were not used by the Company in its proposed business case. Instead, the Company's proposed business case in 45576_IndMich_OUCC 26-6_Confidential Attachment 1_09272021 is a reasonable financial estimate for how customers and the Company benefit from the Company's participation in the EV Crossroads Corridor Project.

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DATA REQUEST SET NO. OUCC DR 26
IURC CAUSE NO. 45576

DATA REQUEST NO OUCC 26-07

REQUEST

Over the next 10 years, will expected net revenue from the charging stations constructed by I&M associated with the Crossroads EV Corridor project exceed the annual revenue requirements?

- a. If yes, provide the net benefit amounts by year.
- b. If no, provide the net deficit amounts by year.

RESPONSE

I&M objects to the request on the grounds and to the extent the request seeks information that is confidential, proprietary, competitively sensitive, and/or trade secret. Subject to and without waiver of the foregoing objection, I&M provides the following response, with the confidential information being provided pursuant to the nondisclosure agreement between the parties.

Yes, the expected net revenue from the charging stations constructed by I&M associated with the Crossroads EV Corridor project will exceed the annual revenue requirements.

In the Company's proposed business case shown in Attachment OUCC_26_6_Attachment_1.xlsx, in the Estimated I&M Charging Revenue less Estimated Revenue Requirement line, I&M Charging Revenue exceeds the annual revenue requirements in years 6 through 11.

- a-b. Please see the Company's proposed business case shown in 45576_IndMich_OUCC_26-6_Confidential Attachment_1_09272021, in the Estimated I&M Charging Revenue less Estimated Revenue Requirement line, years 2022 through 2032.



AGENCY: INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)

TITLE: INDIANA STATEWIDE ELECTRIC VEHICLE CHARGING NETWORK

ACTION: REQUEST FOR PROPOSALS FOR FULL STATEWIDE OR PARTIAL DIRECT-CURRENT FAST CHARGER AND/OR LEVEL 2

DATES: The closing date for receipt of applications is **September 23, 2020, 5:00 p.m. ET**. Indiana will only accept electronic grant applications in response to this RFP. Electronic grant applications must be submitted in Microsoft Word or PDF format to VWTrust@idem.in.gov. Electronic submissions will be considered timely upon receipt, not transmission. An e-mail response confirming receipt of electronic applications will be provided on or before the closing date when possible. Facsimile and late submissions will not be accepted.

SUMMARY: This action announces funding availability for projects focused on improving Indiana's statewide electric vehicle (EV) charging network. Funds will be available for both direct-current fast charge (DCFC) and Level 2 (L2) equipment. These proposals may include plans focused on a single statewide EV charging network as well as regional, local, or individual charging network installations.

FUNDING and AWARDS: The total estimated funding for this competitive grant opportunity is approximately \$6,150,000. Indiana anticipates awarding cooperative agreements from this announcement subject to the availability of funds and the quality of proposals received.

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1. Grant Overview

On January 11, 2017, a [Third Partial Settlement and Consent Decree](#) was finalized between the U.S. Justice Department, the Volkswagen (VW) Corporation and its subsidiaries regarding the installation and use of emission testing defeat devices in over 590,000, 2.0- and 3.0-liter subject vehicles sold and operated in the U.S. beginning in 2009. On September 6, 2017, the United States filed its Notice of and Memorandum in Support of Its Unopposed Motion for Court Approval of Finalized Trust Agreements. The Court approved the Trust documents shortly after this filing. The Environmental Mitigation Trust Fund is the result of a Consent Decree between the U.S. Justice Department, the Volkswagen Corporation, and its subsidiaries. The settlement required Volkswagen to pay \$2.9 billion into an Environmental Mitigation Trust Fund, to offset the excess air pollution emitted by some of the Volkswagen vehicles that violated the Clean Air Act. Indiana has dedicated approximately \$39.77 million from the Trust for projects that provide direct emission reductions across the state with all funds being fully disbursed by 2028. The breakdown of funding for these emission-reducing projects can be found in Table 1.

IDEM, through its commissioner, is authorized to conduct clean air projects through the award of grant funds by [Indiana Code 13-17-3-9](#).

Table 1 – Eligible Mitigation Actions and Indiana Intended Allocations

Eligible Mitigation Action	Intended Allocation
Category 1 – Class 8 Local Freight and Drayage Trucks	\$21,320,000
Category 2 – Class 4 – 8 School, Shuttle, Transit Buses	
Category 6 – Class 4 – 7 Local Freight Trucks	
Category 3 – Freight Switchers	\$8,200,000
Category 4 – Ferries and Tug Boats	
Category 7 – Airport Ground Support Equipment	
Category 8 – Forklifts and Port Cargo Handling Equipment	
Category 5 – Ocean/Lake Going Vessels Shorepower	\$0
Category 9 – Light Duty Zero Emission Supply Equipment	\$6,150,000
Category 10 – Diesel Emission Reduction Act Option	\$4,100,000
Total	\$39,770,000

As noted above, approximately \$6,150,000 has been allocated to Category 9 – Light Duty Zero Emission Supply Equipment used to improve Indiana’s statewide electric vehicle (EV) charging network. If IDEM decides to partially fund a proposal, it will do so in a manner that does not prejudice any grantee or affect the basis upon which the proposal was evaluated and selected for an award, and that maintains the integrity of the competition and the evaluation process. This document provides the program and application guidance necessary to applicants interested in participating in this funding opportunity.

This program will fund two types of EV charging station equipment: Direct-Current Fast Charge (DCFC) and Level 2 (L2). The financial breakdown of available funds for these project types can be found in Table 2. For more information on this funding opportunity, other Indiana Volkswagen Environmental Mitigation Trust programs, and to sign up for updates visit <https://www.in.gov/idem/airquality/2712.htm>.

Table 2 – EV Charging Equipment and Allocated Funding

EV Charging Equipment Type	Allocated Funding
Direct-Current Fast Charge (DCFC)	\$5,535,000
Level 2 (L2)	\$615,000

2. Goals and Objectives of Program

- To develop a statewide EV charging network that provides EV charging locations to the greatest number of citizens
- To create a diverse statewide network that meets the needs of Indiana citizens using both DCFC and L2 charging equipment
- To implement a program that is reliable through multiple charging stations at each location
- To maximize the available funds of \$6.15 million and achieve the greatest value for Indiana’s investment
- To maximize leveraging of public- and private-sourced funds where possible to obtain the greatest number of charging locations possible

3. Applicant Eligibility

Eligible applicants for this program include, but are not limited to:

- For-profit businesses registered with the Indiana Secretary of State
- Nonprofit entities registered with the Indiana Secretary of State
- Federal, state, and local government agencies
- Indiana-based metropolitan planning organizations

4. Eligible Electric Vehicle Charging Equipment Project Types

Indiana intends to allocate 100% of the allotted \$6.15 million through a single round of funding for EV charging locations across the state. All applicants must demonstrate that each station and location has a high potential for utilization.

Two charging station types are eligible for funding through this program: DCFC and L2. These two charging station types serve different key needs of Indiana’s EV owners. While DCFC equipment is often located along interstates and highways to supply the necessary support for long-distance travel, L2 charging equipment is generally located in

residential and retail areas to support more local travel. Together these two types of charging stations can lay the groundwork for a sustainable market for EV owners and station providers across Indiana.

Additional requirements for DCFC and L2 charging stations can be found in Appendix A at the end of this document.

Projects funded under this program will be reimbursed at the maximum dollar amount per charging location or percentage of the total location-specific project costs, whichever is less. The maximum amount and percentage of total costs per location eligible for reimbursement can be found in Table 3.

Table 3 - Summary of Maximum Funding Amount or Percent per Charging Location

EV Charging Equipment Type		Government Agency Publicly Available	Nongovernment Agency Publicly Available	Not Publicly Available
Direct-Current Fast Charge (DCFC)	Max Dollars per Location	\$180,000	\$160,000	\$120,000
	Max Percentage of Project	90%	80%	60%
Level 2 (L2)	Max Dollars per Location	\$9,000	\$8,000	\$6,000
	Max Percentage of Project	90%	80%	60%

Direct Current Fast Charge Sites

The Federal Highway Administration (FHWA) designates Interstates, U.S. Routes, and State Highways as alternative fuel corridors. These alternative fuel corridor designations include all alternatively fueled vehicles, not only electric vehicles. They do, however, provide some general insight into where all alternatively fueled vehicles are likely to operate. As it relates to electric vehicles, this designation is a result of demonstrated local interest, demand for charging stations along these corridors, and regional electric vehicle (EV) travel and traffic counts. IDEM recognizes the value of using FHWA corridor designation as a supporting method to identify key areas for EV charging stations in Indiana. To cover all areas of the state, IDEM will focus this program's

efforts on Indiana Interstates, U.S. Routes, and State Highways over-and-above those currently designated by FHWA. These roadway priorities and traffic volume counts can be found in Appendix B of this document.

A comprehensive database of existing DCFC and L2 charging locations can be found at the U.S. Department of Energy's [Alternative Fueling Station Locator](#). According to the Alternative Fueling Station Locator, Indiana currently has 18 non-Tesla DCFC charging stations online. A list and map of existing non-Tesla DCFC sites in Indiana can be seen in Appendix C of this document.

To appropriately prepare these roadways for long-distance EV travel, the DCFC component of this program is focused on, but not limited to, locating additional DCFC charging sites for light-duty EVs along the roadways listed in Appendix B. The overarching intent of this program is to help fill in existing and projected gaps in Indiana's EV charging station network. Due to their proprietary nature, Tesla supercharger locations are not considered a part of the publicly available charging station network.

All DCFC projects shall meet the requirements listed in Appendix A: DCFC and L2 Project Requirements included in this guidance, where applicable.

Level 2 Charging Sites

The most common EV charging infrastructure currently online in Indiana is L2 charging stations and they can be installed at a much lower cost than DCFC stations. Because of this lower cost, investing in L2 stations can accomplish a great deal even with a notably smaller investment of Indiana's funds. According to the Alternative Fueling Station Locator, Indiana currently has 171 non-Tesla L2 charging stations online. Appendix C of this document also includes a list and map of these station locations.

L2 charging stations can provide conveniently located and accessible charging opportunities. This program does not restrict L2 charging locations to any particular roadway and these sites may be geographically located anywhere across the state.

All L2 projects shall meet the requirements listed in Appendix A: DCFC and L2 Project Requirements included in this document, where applicable.

5. Ineligible Projects

Projects not eligible for award under this program include, but may not be limited to:

- Installation of Level 1 charging equipment
- Installation of hydrogen fueling stations
- DCFC sites more than one (1) road mile off Indiana roadways highlighted in Appendix B. Exceptions may be considered on a case-by-case basis provided the need for these exceptions are clearly documented and supported.

- Projects not meeting the requirements listed in Appendix A

6. Costs Eligible for Reimbursement

Costs directly incurred by the grantee through the purchase and/or installation of eligible equipment after the execution of a project funding agreement are eligible for reimbursement subject to the limitations in Table 3. These costs may include the procurement of goods and services from vendors and contractors, labor costs incurred by the grantee's employees for installation, and other costs necessary to complete the project. All costs must be supported by appropriate documentation. IDEM retains the sole authority to determine eligible project costs.

7. Application Limitations and Requirements

Applicants may submit more than one application; however, each application must request funds for either DCFC or L2; not both. An applicant can include the addition of an L2 charger in the form of leveraged funds in a DCFC application. Each application may include more than one charging site. If submitting more than one charging site in an application (or multiple applications), the applicant must prioritize sequentially the charging sites at the time of submission (unless the application is for a full, statewide charging network). Awards will be made on a cost-reimbursement basis. This means grantees must incur the cost of the project before being repaid. Costs must be incurred only after a project is selected for an award and a project funding agreement has been executed between IDEM and the grantee.

Eligible project costs include, but are not limited to:

- DC fast charging station, power conversion, hardware, and associated equipment (with required warranties)
- Level 2 charging station, hardware and associated equipment (with required warranties)
- Supporting costs such as final design, engineering and permitting
- Utility upgrades such as transformers and extensions
- Initial networking/subscription activation fees for a charging network (often included as a component of the required 5-year warranty as detailed in Appendix A)
- Payment module, as required by this program
- Cord or cable management strategy including retractable cords
- Battery storage

- Construction and/or installation costs directly related to the charging station such as dedicated parking spaces, electrical service and connection, on-site sign installation, installation of lighting, shelter/awning construction, etc.

Costs Ineligible for Reimbursement

Funds awarded by this program cannot be used for administrative costs, lobbying, or for the intervention in federal regulatory or adjudicatory proceedings. Costs incurred before the execution of the project funding agreement are also ineligible project costs and will not be reimbursed.

Ineligible costs include, but are not limited to:

- Research projects and studies
- Feasibility studies such as surveys to determine interest in the installation of EV charging stations in particular locations
- Proposals for any type of vehicle demonstration or demonstrations of existing technologies for public outreach or education
- Land or parking space purchase/lease
- Level 1 infrastructure
- Internet and/or cellular connection (wireless or otherwise)
- Ongoing or annual networking/subscription fees for a charging network outside of those included in 5-year warranty as detailed in Appendix A
- Electricity consumption and demand charges
- General maintenance or repair of equipment or facilities
- Administrative costs
- Signs and installation of signs located off-site or along adjacent roadways directing drivers to the charger locations
- Other capital costs, such as the construction of buildings, parking facilities, etc. or general maintenance other than the supply equipment.
- Construction or installation of site amenities not directly related to the charging station such as restrooms

8. Funding and Cost-Share Requirements

Grantees will receive reimbursement for eligible costs incurred up to the maximum dollar amount or percentage of total costs listed in the project funding agreement. No costs to be

reimbursed may be incurred before the execution of the project funding agreement. A cost is considered incurred if it has been ordered, contracted, purchased, or installed. Requests for reimbursement shall be in a manner as specified by IDEM and must include documentation to show that the equipment has been received and installed by the grantee; the equipment is fully operational; all requirements of the project funding agreement have been met; and that the costs have been incurred and paid by the grantee.

Mandatory cost-shares are required for all projects. Reimbursement of eligible costs will only be provided up to the maximum dollar amount or percentage of total costs included in the project funding agreement and in accordance with this document. The remaining project costs are the responsibility of the grantee and serve as the grantee's cost-share. In-kind donations are not eligible project costs and may not be credited as part of a grantee's cost-share.

Preference will be given to proposals that include a financial cost-share match over and above those detailed in this announcement. This will enable the program to maximize the total funds available.

Disqualification from Funding

The grantee shall not receive reimbursement if complete and truthful information has not been submitted to IDEM. The grantee will be disqualified and shall not receive reimbursement if the grantee has:

- Not submitted a claim for reimbursement and all required documentation by the deadline included in the project funding agreement, or
- Incurred costs before the execution of the agreement.

9. Award Timeline and Requirements

All applicants will be notified regarding their award status at the conclusion of the funding cycle. Applicants selected to receive funding will be required to execute a project funding agreement with IDEM. Although not required at the time of application, a simple site plan showing the charging site location, planned site improvements to be reimbursed, and other pertinent details of the project parcel will be required before a draft agreement is provided by IDEM to the recipient. If the successful applicant fails to deliver an executed agreement within 30 days of receipt, IDEM, at its sole discretion, may cancel the award and award the funds to another applicant.

Upon execution of the agreement by IDEM, a copy of the fully executed agreement will be returned to the grantee, at which time the funding will be considered awarded. The project, including the purchase of equipment, may not occur before the execution of the agreement.

IDEM proposes the following estimated timeline:

Project Milestone	Approximate Date of Completion	Approximate Accumulated Time from Web Posting
RFP Posted Online	June 23, 2020	
Proposal Receipt Deadline	September 23, 2020	13 Weeks
Proposal Review, Prioritization, and Selection	October 21, 2020	17 Weeks
Selected Proposal Notification	October 28, 2020	18 Weeks
Grant Agreements Fully Executed	November 25, 2020	22 Weeks
Projects Completed and Fully Implemented	December 31, 2022	131 Weeks

Agreement Terms

Applicants interested in applying for funding should consider the following items that will be part of the requirements addressed in the agreement:

- All projects selected for funding shall be completed no later than December 31, 2022. If an application indicates a project cannot be completed within this timeframe, it will not be considered for funding.
- Charging locations funded by this program must be in operation for not less than five years. Sites may be upgraded by the grantee over this period, but the number of charging plugs and minimum charging capability shall not be reduced.
- Grantees will be required to submit biannual and final reports to IDEM, as well as progress reports upon request.
- The claim for reimbursement of costs and all required documentation is due to IDEM within one month after the completion of the project. IDEM will not reimburse the applicant until all requirements are met. No reimbursement will be made for any costs incurred in the development of a project that is not successfully completed and placed in service. Failure to maintain the project and comply with all terms of the agreement will result in the repayment of funds reimbursed. Under no circumstances will reimbursement be made for costs incurred before the execution of the agreement.

- Grantees should expect to allow a minimum of 90 days for reimbursement processing.
- Grantees will procure all goods and services in accordance with state law and must make a good faith effort to encourage competition. All documents relating to procurement will be made available to IDEM upon request.
- All information submitted to IDEM over the course of the project, including all records supporting all expenditures of funds, is subject to inspection by interested parties and disclosure to the public, subject to any applicable confidentiality exceptions provided in applicable state or federal laws.

10. Project Reporting and Monitoring Requirements

Grantees will be required to submit biannual reports to IDEM from the contract start date until the project is completed, along with a final report, and interim progress reports upon request. Additionally, all grantees will submit annual station utilization data to IDEM for no less than 5 years after project completion. At a minimum, the following information will be submitted for each charging station installed:

- Number of charging events
- Connect and disconnect times
- Start and end charge times
- Number of unique vehicles connected
- Total kWh dispensed per charging event
- Average kWh per charging event
- Peak power (kW) per event
- Peak power (kW) by time and date
- Peak power demand (kW) by month
- Average duration of charging events
- Percentage of station downtime

11. How to Apply

Indiana will only accept electronic grant applications in response to this RFP. Electronic grant application narratives and any required supporting materials must be submitted in a single Microsoft Word or PDF document format, to VWTrust@idem.in.gov. Electronic submissions will be considered timely upon receipt, not transmission. An e-mail response confirming receipt of electronic proposals will be provided on or before the

closing date when possible. Hard-copy, facsimile, and late submissions will not be accepted.

Applicants may submit more than one application; however, each application must request funds for either DCFC or L2; not both. Each application may include more than one charging site location. If submitting more than one charging site location in an application (or multiple applications), the applicant must prioritize sequentially the charging site locations at the time of submission (unless the application is for a full, statewide charging network). An applicant can include the addition of an L2 charger in the form of leveraged funds in a DCFC application. **Completed applications are due by email before September 23, 2020, 5:00 p.m.** Applications received after the deadline will be deemed ineligible and will not be reviewed. Incomplete applications may be disqualified from consideration. IDEM is not responsible for any errors or delays caused by technical difficulties resulting from the emailing of applications.

Content and Form of Application Submission

The grant application must contain the following information, preferably in the sequential order shown:

1. Signed cover letter on the applicant's letterhead that briefly summarizes the applicant's proposal.
2. If the applicant is a privately-owned entity, the application must include a completed and signed copy of the Automated Direct Deposit Authorization Agreement and W-9 Form.
3. Narrative Work Plan. This document, a maximum of 15 pages in length, must conform to the following outline:
 - a. *Project Title.*
 - b. *Title of IDEM RFP from which funds are being requested.*
 - c. *Grantee Information:* Include applicant (organization) name, address, contact person, phone number, fax, and e-mail address.
 - d. *Funding Requested:* Specify the amount of monies being requested from the program.
 - e. *Total Project Cost:* Specify the total cost of the project, including program funding and applicant's financial cost-share. Identify funding from other sources where needed along with a clear demonstration that these funds are in-hand and obligated to this project.
 - f. *Project Schedule:* Provide a detailed project schedule starting from the approximate award date (for planning purposes, Grantees should assume funds will be available by no later than 60 days after notification of

award), including all key milestones that demonstrate progress, along with a projected completion date.

- g. *Project Description:* Explicit description of how the proposed project meets the program's goals and objectives along with the requirements detailed in Appendix A, to include:
- i. A detailed project summary, a description of specific actions to be undertaken, and the estimated timeline for each component.
 - ii. An explanation of how the project benefits air quality for citizens of Indiana, including an estimate (and how the estimate is calculated) of the number of citizens positively affected.
 - iii. A plan for tracking and measuring the progress toward achieving the anticipated outcomes of the project.
 - iv. An explanation of how project success will be evaluated.
 - v. A detailed summary describing the physical location(s) where EV charging stations will be installed along with a demonstration that current and anticipated EV utilization supports long-term viability at the location.
 - vi. A description of the roles of the applicant and partners, if any.
 - vii. Contact information for all key personnel.
 - viii. To the extent not covered above, information to address the evaluation criteria included in this document.

12. Evaluation of Applications

Eligible projects will be evaluated on a competitive basis according to the scoring criteria listed in Table 4. While the scoring criteria provided in this section are the primary means of determining a selected project, IDEM may also consider other factors not included in these scoring criteria in making the final selection of projects. In addition to the quantitative evaluation based on Table 4 below, additional qualitative considerations will be given to applications that include:

- Reasonable geographic distribution of projects across the state.
- Collaboration among a diverse set of stakeholders to advance a broader environmental vision or goal for the area.
- Evidence of regional support of a project.
- Evidence of a clear plan of action, milestones, and schedule for project completion.

- Evidence of commitment by the owner to maintain DCFC and/or L2 charging station equipment
- Evidence of project implementation feasibility without significant obstacles to ensure continued use of the charging station.

Projects will be evaluated and scored based on the following criteria:

Table 4: Scoring Criteria and Maximum Points Available

Scoring Criteria	Maximum Points Available
Cost-effectiveness of the project (a ratio of the total investment of VW program funds to annual average daily traffic at project location)	25
Long-term Sustainability and Maintenance of Site (ability to continue efforts or expand the project after the mitigation project funding is utilized)	20
Compliments other programs for a statewide network or the application itself supports a statewide network (the ability of the proposal to meet the goal for a statewide network and to fill in infrastructure gaps)	20
Verified leveraging of additional resources (financial only).	15
Project Readiness (is project “shovel-ready” and what is projected total project build timeline)	10
Quality of site marketing and amenities (amenities such as restrooms, food, and shopping; and marketing; and marketing of site location to consumers)	10
TOTAL POINTS AVAILABLE	100

Disqualification of Applications

IDEM may reject outright and may not evaluate applications for any one of the following reasons:

- The applicant fails to deliver the application by the due date and time.
- The applicant acknowledges that a requirement of the application cannot be met.
- The applicant's proposal materially changes a requirement of this guidance or the proposal is not compliant with the requirements of this guidance.
- The applicant's proposal limits the rights of IDEM.
- The applicant fails to timely respond to IDEM's request for information, documents, or references.
- The applicant fails to include an original signature.
- The applicant presents the information requested by this guidance in a format inconsistent with the instructions of the guidance or otherwise fails to comply with the requirements of the guidance.
- The applicant provides misleading or inaccurate responses.
- There is insufficient evidence (including evidence submitted by the applicant and evidence obtained by IDEM from other sources) to satisfy IDEM that the applicant is properly qualified to satisfy the requirements of the guidance or application.
- The proposed project(s) are not in compliance with applicable state and federal statutes and rules.

13. Application Questions

Questions or requests for clarification about this program may be submitted in writing via email to SSeals@idem.in.gov. Verbal questions will not be addressed. If the question or request for clarification pertains to a specific section of this guidance document, please reference the section and page number. A list of written questions and answers will be available for review at <https://www.in.gov/idem/airquality/2712.htm>.

IDEM reserves the right to amend this guidance at any time by addendum. If the addendum is issued after the closing date for receipt of applications, IDEM may, in its sole discretion, allow applicants to amend their project applications in response to the addendum, if necessary.

IDEM Discretion

IDEM may select a part of an application for funding and/or may offer to fund less than the dollar amount requested in an application. IDEM reserves the right to reject any or all applications, in whole or in part, any time before the execution of a project funding agreement.

IDEM is not obligated to fund an application from an applicant that has demonstrated marginal or unsatisfactory performance on previous grants or contracts with IDEM or other state agencies.

IDEM reserves the right to verify the information contained in the application. This may include utilizing publicly available information and other outside sources to evaluate the applicant's performance under other contracts.

IDEM Disclaimer

IDEM accepts no obligation for costs incurred by the applicant in anticipation of being awarded a grant. IDEM creates no obligation expressed or implied by issuing this Request for Proposals or by receipt of any projects submitted. The award of any grant monies shall be at the sole discretion of IDEM. Neither this Request for Proposals nor any response resulting from this announcement is to be construed as a legal offer.

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Appendix A: DCFC and L2 Project Requirements

	Direct-Current Fast Charge (DCFC) Sites	Level 2 (L2) Sites
Site Requirements		
Located no more than one (1) road mile off roadways listed in Appendix B of this document. Exceptions may be considered on a case-by-case basis provided the need for these exceptions are clearly documented and supported.	•	
Publicly visible, accessible, and available to drivers for charging (24 hours a day, 7 days a week)	•	•
Sites must provide a safe, well-lighted area for users	•	•
Paved parking spaces to allow the maximum capacity of EVs to be charged simultaneously	•	•
Appropriate signage on-site for drivers to locate charging station from the site entrance	•	•
Clear signage and pavement stenciling that states the location is for “Electric Vehicle Charging Only”	•	•
Equipment Requirements		
DCFC site rated at a minimum of 100kW. This can be accomplished by pairing two (2) 50kW stations in such a manner that one (1) vehicle can obtain a minimum of 100kW charging level, but the equipment will also charge two (2) vehicles separately at a minimum of 50kW.	•	
Each DCFC offers both CHAdeMo and SAE Combo/CCS (Combo Charging System) compatible connectors	•	

Each Level 2 charger offers a J1772 compatible connector		•
Charging equipment must be certified through the Nationally Recognized Testing Laboratory (NRTL) program to demonstrate compliance with appropriate product safety test standards	•	•
Charging enclosure must be constructed for use outdoors in accordance with UL50, Standard for Enclosures for Electrical Equipment, NEMA, Type 3R exterior enclosure or equivalent	•	•
A cord management system or method to eliminate potential for cable entanglement, user injury and connector damage from lying on the ground	•	•
PAYMENTS, PRICING, & DATA REQUIREMENTS		
Universal payment system allowing multiple payment methods to be used by charging drivers	•	•
Real-time pricing information displayed on the device or payment screen	•	
Utilization of open standards including OCPP	•	•
Equipment is networked by Wi-Fi or cellular connection and network hardware and software is maintained with the capability for: remote diagnostics, remote start of the equipment, collecting and reporting usage data, processing payments, and tracking usage by the kilowatt-hour.	•	•
Annual site utilization data collection	•	•
SPONSOR/VENDOR REQUIREMENTS		
Make every effort to educate the general public of the existence of the new charging site including registering the site on a station locator	•	•

<p>Customer service support is available by telephone 24 hours a day and 7 days a week and is clearly posted to assist customers with difficulties accessing or operating the equipment</p>	•	
<p>Customer service support is available by telephone from 6am to 6pm, Monday through Saturday and is clearly posted to assist customers with difficulties accessing or operating the equipment</p>		•
<p>Site development, project installation, and maintenance shall comply with all applicable laws, ordinances, regulations, and standards, including, but not limited to, the Americans with Disabilities Act (ADA).</p>	•	•
<p>Equipment has at least a 5-year warranty with the option of additional ongoing maintenance and support with an uptime guarantee on the equipment of 95% or greater for the full lifetime of the charging station</p>	•	•
<p>Should repair be necessary, chargers shall be fully operating within 72 hours of equipment issue/breakdown to ensure a 95% annual uptime guarantee.</p>	•	

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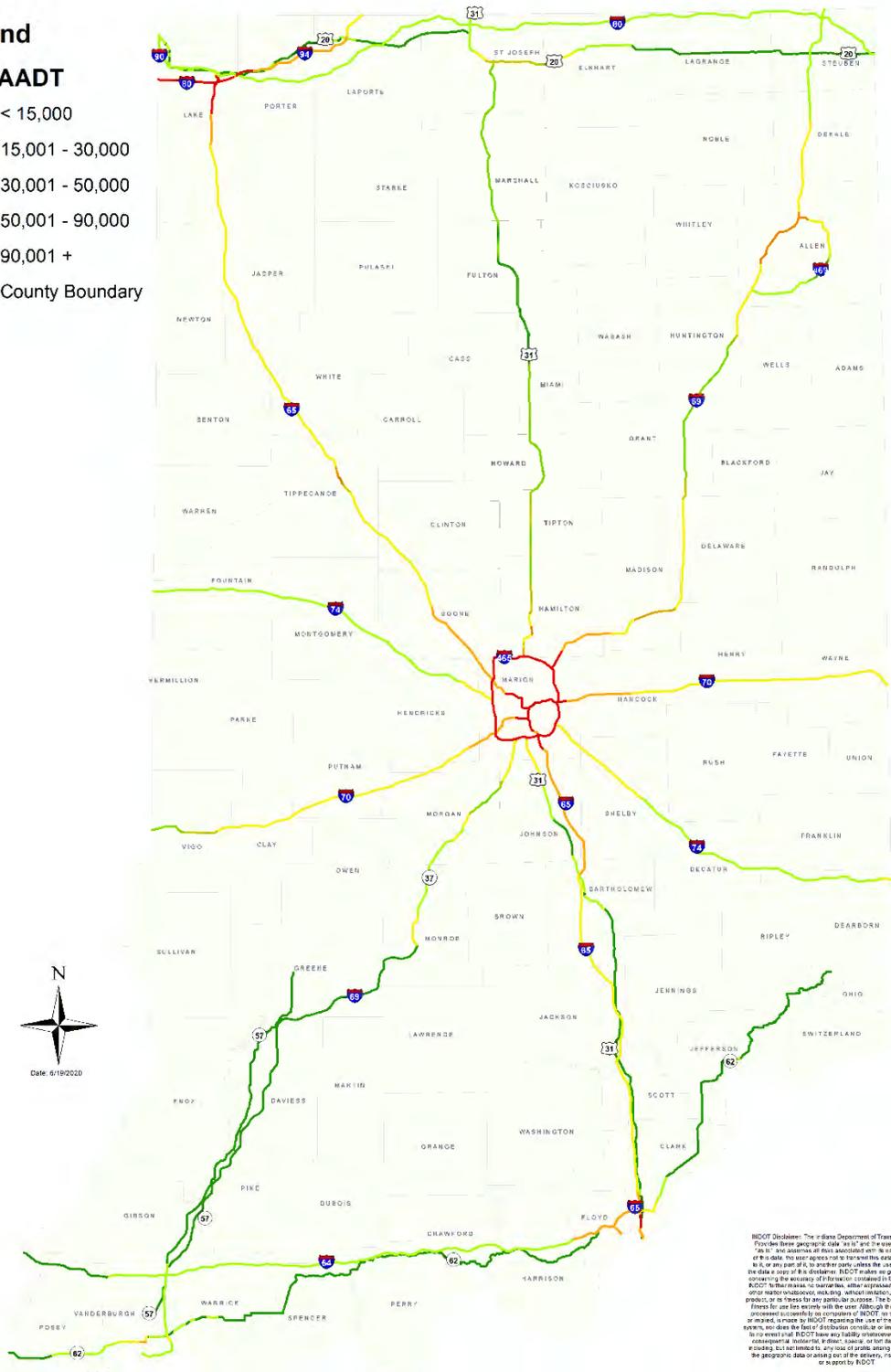
Appendix B: Indiana EV Charging Roadway Priorities

Annual average daily traffic (AADT) is the total volume of vehicle traffic on a roadway for a calendar year divided by 365 days. AADT can be a useful and simple measurement to identify where traffic volume might best support the installation of EV charging stations. The map on the following page shows the AADT for the priority roadways for this program.

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2019 Annual Average Daily Traffic for Selected Indiana Corridors

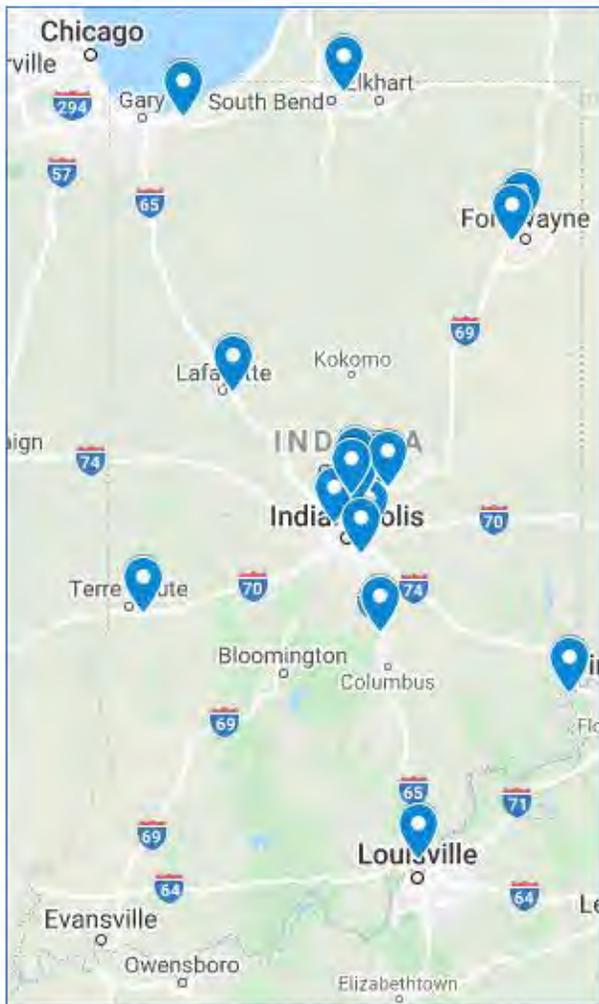
- Legend**
- 2019 AADT**
- < 15,000
 - 15,001 - 30,000
 - 30,001 - 50,000
 - 50,001 - 90,000
 - 90,001 +
- County Boundary



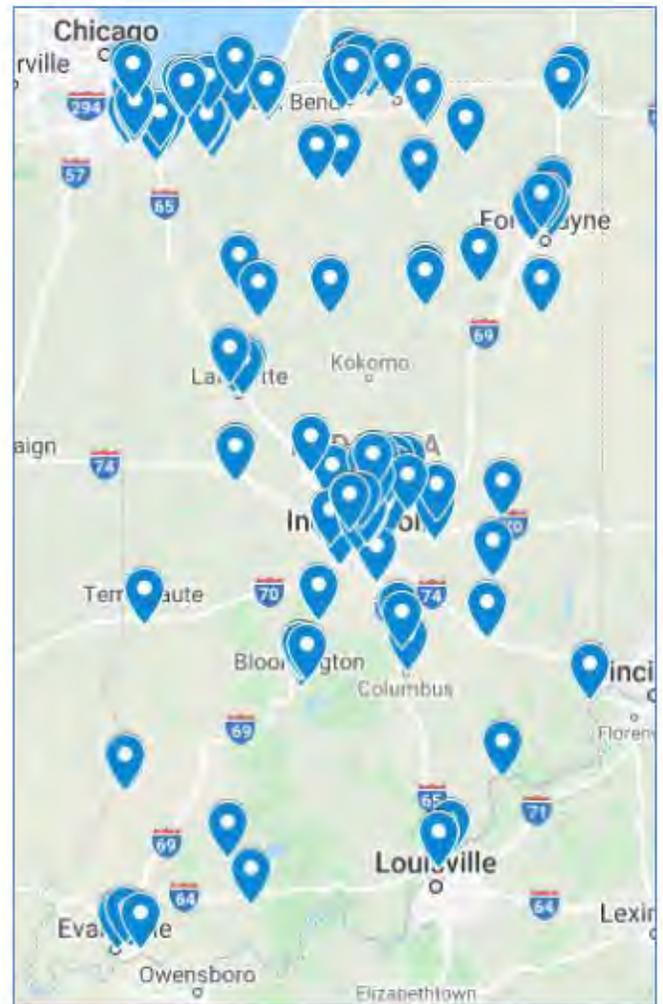
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**Appendix C: Current Indiana
Direct-Current Fast Charge and Level 2 Site Locations**

**Direct-Current Fast Charge
Locations
(18 across Indiana)**

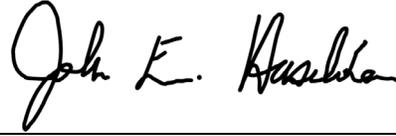


**Level 2
Locations
(171 across Indiana)**



AFFIRMATION

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



John E. Haselden
Senior Utility Analyst
Indiana Office of Utility Consumer Counselor
Cause No. 45576
Indiana Michigan Power Co.

October 12, 2021

Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the Indiana Office of Utility Consumer Counselor's Public Testimony Filing has been served upon the following parties of record in the captioned proceeding by electronic service on October 12, 2021.

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