

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC )  
SERVICE COMPANY LLC PURSUANT TO IND. CODE )  
§§ 8-1-242.7, 8-1-2-61 AND 8-1-2.5-6 FOR (1) )  
AUTHORITY TO MODIFY ITS RETAIL RATES AND )  
CHARGES FOR ELECTRIC UTILITY SERVICE )  
THROUGH A PHASE IN OF RATES; (2) APPROVAL )  
OF NEW SCHEDULES OF RATES AND CHARGES, )  
GENERAL RULES AND REGULATIONS, AND RIDERS )  
(BOTH EXISTING AND NEW); (3) APPROVAL OF )  
REVISED COMMON AND ELECTRIC )  
DEPRECIATION RATES APPLICABLE TO ITS ) CAUSE NO. 46120  
ELECTRIC PLANT IN SERVICE; (4) APPROVAL OF )  
NECESSARY AND APPROPRIATE ACCOUNTING )  
RELIEF, INCLUDING, BUT LIMITED TO, )  
AUTHORITY TO CAPITALIZE AS RATE BASE ALL )  
EXPENDITURES FOR IMPROVEMENTS TO )  
PETITIONER'S INFORMATION TECHNOLOGY )  
SYSTEMS THROUGH THE DESIGN, DEVELOPMENT, )  
AND IMPLEMENTATION OF A WORK AND ASSET )  
MANAGEMENT ("WAM") PROGRAM, TO THE )  
EXTENT NECESSARY; AND (5) APPROVAL OF )  
ALTERNATIVE REGULATORY PLANS FOR THE )  
PARTIAL WAIVER OF 170 IAC 4-1-16(f) AND )  
PROPOSED REMOTE DISCONNECTION AND )  
RECONNECTION PROCESS AND, TO THE EXTENT )  
NECESSARY, IMPLEMENTATION OF A LOW )  
INCOME PROGRAM. )

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR**  
**PUBLIC'S EXHIBIT NO. 10**  
**TESTIMONY OF OUCC WITNESS**  
**JOHN W. HANKS**

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER  
COUNSELOR



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**TESTIMONY OF OUCC WITNESS JOHN W. HANKS**  
**CAUSE NO. 46120**  
**NORTHERN INDIANA PUBLIC SERVICE COMPANY**

**I. INTRODUCTION**

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

2 A: My name is John W. Hanks, and my business address is 115 West Washington  
3 Street, Suite 1500 South, Indianapolis, Indiana 46204.

4 **Q: By whom are you employed and in what capacity?**

5 A: I am employed as a Utility Analyst in the Indiana Office of Utility Consumer  
6 Counselor's ("OUCC") Electric Division. A summary of my educational  
7 background and experience is provided in Appendix A attached to my testimony.

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

9 A: I describe my analysis of Northern Indiana Public Service Company LLC's  
10 ("NIPSCO" or "Petitioner") proposed Multi-Family Rate 615 ("Multi-Family  
11 Rate" or "Rate 615"). I maintain that it is premature for NIPSCO to propose a new  
12 tariff for multi-family customers when the hourly usage and peak characteristics of  
13 these customers are based on an estimate derived from a sample of only 127 service  
14 locations. NIPSCO should only propose a multi-family rate in a future proceeding  
15 after it completes deployment of Advanced Metering Infrastructure ("AMI"), if  
16 appropriate. It should be based upon a more robust study using billing history and  
17 AMI hourly data to better define the sub classes and determine the cost causation  
18 characteristics of the prospective multi-family residential customers.

1 **Q: Please describe the review you conducted to prepare your testimony.**

2 A: I reviewed the testimonies and workpapers of NIPSCO's witnesses Erin E.  
3 Whitehead and John D. Taylor. I also reviewed relevant information from  
4 NIPSCO's previous rate case, Cause No. 45772, relating to multi-family customers.  
5 Additionally, I assisted in drafting data requests, reviewed the responses, and  
6 conferred with other OUCC staff and witnesses regarding issues in this Cause.

## II. MULTI-FAMILY RATE BACKGROUND

7 **Q: Describe NIPSCO's proposed Multi-Family Rate.**

8 A: NIPSCO is proposing a new Rate 615 for residential customers living in multi-  
9 family structures containing two or more separate living quarters. As proposed,  
10 Rate 615 includes an energy charge, a customer charge, and applicable rider  
11 charges.<sup>1</sup> The Multi-Family Rate will have a lower energy charge than Rate 611 for  
12 standard residential service. Based on the Cost of Service Study prepared for  
13 NIPSCO in this case, Multi-Family Rate 615 will cost \$0.175825 per kWh, while  
14 standard residential service Rate 611 will cost \$0.198605 per kWh.<sup>2</sup> Under  
15 NIPSCO's request, both Rate 611 and Rate 615 have a customer charge of \$25.00  
16 per month.<sup>3</sup> NIPSCO is the first Indiana investor-owned electric utility to propose  
17 a separate rate specifically for multi-family customers.

18 **Q: Why is NIPSCO proposing a residential Multi-Family Rate in this case?**

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<sup>1</sup> Petitioner's Exhibit No. 2, Verified Direct Testimony of Erin E. Whitehead, p. 46, ll. 1-12.

<sup>2</sup> *Id.*, Attachment 2-C, Original Sheet Nos. 48 and 49.

<sup>3</sup> *Id.*

1 A: In NIPSCO's prior rate case, Cause No. 45772, the Indiana Utility Regulatory  
2 Commission ("Commission") approved a Stipulation and Settlement Agreement in  
3 which NIPSCO agreed to collect data to identify its multi-family customers and to  
4 analyze the cost differentials between single-family and multi-family residential  
5 customers.<sup>4</sup> For purposes of this Cause, Atrium Economics, LLC ("Atrium")  
6 performed an analysis to determine whether there are distinct usage and cost  
7 characteristics, based on the cost of service methodology, that warrant separating  
8 multi-family from single-family customers.<sup>5</sup>

9 According to NIPSCO witness Taylor, Atrium's analysis concluded there  
10 are distinct characteristics that warrant separating multi-family from single-family  
11 customers for purposes of cost allocation and rate design.<sup>6</sup> As a result, NIPSCO is  
12 proposing Rate 615 – Multi-Family Rate, which purports to better align rates and  
13 the cost to serve. To develop Rate 615, costs were assigned to the single-family and  
14 multi-family customers using NIPSCO's cost of service study. Per Mr. Taylor, "the  
15 segmentation of the residential class between SF [single-family] and MF [multi-  
16 family] fully eliminates the intraclass subsidy that was occurring between MF and  
17 SF customers, where MF customers have, on average, a lower cost to serve than SF  
18 customers."<sup>7</sup>

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<sup>4</sup> *Petition of N. Ind. Pub. Serv. Co. for Authority to Change Rates*, Cause No. 45772, Order p. 32 and Attachment A, Stipulation and Settlement Agreement, p. 24 (Ind. Util. Regul. Comm'n Aug. 2, 2023).

<sup>5</sup> Petitioner's Exhibit No. 16, Verified Direct Testimony of John D. Taylor, p. 49, ll. 7-10.

<sup>6</sup> *Id.*, p. 49, l. 11 through p. 50, l. 4.

<sup>7</sup> *Id.*, p. 73, l. 17 through p. 74, l. 2.

### III. MULTI-FAMILY RATE ANALYSIS

#### ATRIUM'S ANALYSIS

1 **Q: Describe Atrium's single-family and multi-family cost of service analysis.**

2 A: To conduct Atrium's analysis, NIPSCO initially provided billing records for Rate  
3 511 residential customers provided with service in 2023. Atrium separated the  
4 customer records into single-family and multi-family designations. Atrium  
5 designated multi-family customers based on two alternative criteria:

- 6 1) whether a customer was both a NIPSCO gas and electric customer and  
7 currently taking gas service on a multi-family rate; or  
8 2) whether a customer was an electric customer only and had "APT,"  
9 "SUITE," or "UNIT" in the service address.<sup>8</sup>

10 By default, all customers not designated multi-family under these criteria were  
11 designated single-family.<sup>9</sup> Next, Atrium used billing records from NIPSCO's  
12 Customer Information System ("CIS") to determine monthly usage characteristics  
13 across the two subsets of customers.<sup>10</sup> Atrium also used the CIS data to identify  
14 127 load research sample meters that had already been deployed at residential  
15 locations to complete its statistical analysis.<sup>11</sup>

16 Atrium then identified whether NIPSCO's load research sample meters  
17 were located at single-family or multi-family service locations in order to analyze

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<sup>8</sup> Taylor Direct, p. 52, ll. 7-10.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*, p. 50, ll. 13-16.

<sup>11</sup> *Id.*, p. 51 ll. 2-4 and p. 53, ll. 8-9.

1 hourly usage characteristics. Hourly usage characteristics were estimated for  
2 single-family and multi-family customers based on these load research sample  
3 meters.<sup>12</sup>

4 **Q: Describe the results of Atrium's analysis.**

5 A: Atrium's analysis found distinct usage characteristics between multi-family and  
6 single-family service locations. The multi-family customers within the sample had  
7 lower kWh usage per month,<sup>13</sup> as well as a flatter peak.<sup>14</sup>

### **CONCERNS AND RECOMMENDED SOLUTIONS**

8 **Q: Do you have concerns with using Atrium's analysis to approve a new rate**  
9 **class?**

10 A: Yes. I am concerned about the limited sample size used to determine the hourly  
11 characteristics of multi-family customers, that only one year of data was used to  
12 determine the intraclass subsidy, and whether single-family and multi-family  
13 customers have been accurately identified. The hourly usage characteristics,  
14 including the time and magnitude of the monthly peak, were based on information  
15 from only 127 load research sample meters or, put another way, the hourly usage  
16 characteristics of multi-family customers were estimated based on only 0.03% of  
17 NIPSCO's 429,840 residential customers.<sup>15</sup> To allocate costs between single-  
18 family and multi-family customers as a whole within the residential rate class, the  
19 hourly usage characteristics from the load research meters were applied to all multi-

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<sup>12</sup> Taylor Direct, p. 51, ll. 2-4.

<sup>13</sup> *Id.*, p. 52, Table 5.

<sup>14</sup> *Id.*, p. 54, Table 7.

<sup>15</sup> *Id.*, p. 53, ll. 8-9.

1 family customers.<sup>16</sup> Of the research sample meters, 21 were identified as multi-  
2 family while 106 were single-family service locations.<sup>17</sup> This means that sample  
3 meters from just 21 multi-family customers were used to estimate the hourly  
4 characteristics of 68,195 prospective multi-family customers in NIPSCO's service  
5 territory.<sup>18</sup> Extrapolating hourly usage for such a large subset of customers from  
6 this small sample creates the risk for a new subsidy between customer classes.  
7 Using potentially inaccurate rates could result in single-family customers paying  
8 higher rates that subsidize multi-family customers, instead of alleviating a multi-  
9 family intraclass subsidy.

10 While Atrium's analysis shows there are likely differences in the cost to  
11 serve single-family versus multi-family customers, creating a new rate class should  
12 be based on actual usage history of a sufficiently large sample of the class, rather  
13 than extrapolated estimates that are applied to the entire class. NIPSCO describes  
14 the proposed Multi-Family Rate as "fully eliminating" an intraclass subsidy  
15 between multi-family to single-family customers.<sup>19</sup> However, basing customer  
16 rates on the characteristics of such a small sample size unnecessarily risks simply  
17 creating a new intraclass subsidy.

18 **Q: Is it problematic that only one year of data was used to estimate the cost to**  
19 **serve multi-family customers?**

20 **A:** Yes. The sample data only reflected one year, 2023. There is no way to know if the

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<sup>16</sup> Taylor Direct., p. 55, ll. 3-5.

<sup>17</sup> *Id.*, p. 53, ll. 9-12.

<sup>18</sup> *Id.*, p. 53, Table 6.

<sup>19</sup> *Id.*, p. 73, l. 17 through p. 74, l. 2.

1       alleged intraclass subsidy would be greater or lesser than usual due to weather  
2       conditions over the long term. Only using one year of data to define seasonal peak  
3       load characteristics biases the results for the weather patterns of that one year. To  
4       alleviate this concern, I recommend using AMI data, as discussed below, in addition  
5       to monthly billing records and the load research sample meters, over a broader time  
6       period, in order to include a larger sample that better represents customer usage  
7       characteristics and alleviates weather extremes or variations in a single year.

8       **Q: Do you have concerns with how multi-family customers are defined?**

9       A: Yes. It is premature to create a new customer class and rate for that class when  
10      those customers are not yet adequately identified and distinguished. A limitation of  
11      NIPSCO's definition, which includes customers as multi-family if they take service  
12      on a low-income gas tariff or have "APT," "SUITE," or "UNIT" in the service  
13      address, is that it may exclude certain customers, including those living in  
14      condominiums where each unit has a separate street address, while sharing other  
15      characteristics NIPSCO uses for its separation analysis. It may also incorrectly  
16      include, or exclude, customers based on a separate classification used for gas  
17      customers, which is subject to changes or modifications under gas tariff definitions.  
18      For example, some customers who live in condominiums may have higher usage  
19      or distinct characteristics such that misclassification could skew the results.  
20      Incorrectly including, or excluding, customers from the multi-family average may  
21      artificially skew the cost to serve analysis. It is also premature to correct a newly  
22      identified intraclass subsidy before these subsidies can be shown for the entire class  
23      in usage history. As discussed below, this problem could be alleviated during the



1 installation of AMI technology, since contractors could specifically identify  
2 whether each customer lives in a multi-family or single-family dwelling, per the  
3 defined characteristics.

4 **Q. Do you have further concerns about the multi-family rate proposal?**

5 A. Yes. The current volumetric rate for residential customers includes both fixed and  
6 variable costs.<sup>20</sup> Atrium's information shows the multi-family customer sample  
7 used less energy and had lower peaks.<sup>21</sup> Therefore, a typical multi-family customer  
8 has a lower bill (e.g. 400 kWh) than a typical SF customer (e.g. a 700 kWh) bill.  
9 Since the volumetric rate the single-family customer pays for 300 more kWh  
10 incorporates fixed costs, these customers are already paying for their greater use of  
11 the system. Even if some subsidy remains, the question becomes how fixed costs  
12 are allocated as the single-family customer pays more fixed costs by having a higher  
13 kWh bill.

14 Mr. Taylor describes that Atrium created a monthly separation factor based  
15 on energy use and coincidence to peak load.<sup>22</sup> Thus, there seems to be an  
16 assumption that lower average energy usage, together with lower coincidence to  
17 peak load, translates to lower fixed costs. The determination of lower cost is based  
18 on usage and contribution to the monthly peak, and not specifically identified fixed  
19 cost differences. Mr. Taylor states there are fixed cost differences due to different  
20 equipment, but he only describes these generally and identifies only one type of

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<sup>20</sup> Taylor Direct, p. 18, l. 17 through p. 19, l. 1.

<sup>21</sup> *Id.*, p. 56, ll. 9-12.

<sup>22</sup> *Id.*, p. 55, ll. 7-9.

1 different equipment – service conductors – used to estimate differences in  
2 distribution costs.<sup>23</sup> He acknowledges, “it is not always ‘apples-to-apples’ when  
3 comparing historical or actual costs between an SF or MF installation.”<sup>24</sup> However,  
4 Atrium concluded a new multi-family residential building would have a lower  
5 service cost per meter compared to an equivalent number of individually metered  
6 single-family dwellings.<sup>25</sup> Mr. Taylor describes that some equipment costs are the  
7 same – like the relative cost of meters or transformers – and some are lower - like  
8 the length and type of service conductor.<sup>26</sup> So, to determine the size of the alleged  
9 subsidy, there is more to be considered than contribution to monthly peak. Fixed  
10 equipment cost differences would also need to be ascertained. Single-family  
11 customers already contribute more to fixed costs of the system through their higher  
12 kWh bills, and NIPSCO did not precisely identify the difference in the cost to serve  
13 single-family or multi-family customers based on equipment costs. It is premature  
14 to correct a subsidy by creating a new rate class before better determining the size  
15 of the alleged subsidy.

16 **Q: Do you have additional concerns due to the level of increase requested for**  
17 **residential single-family customers?**

18 A: Yes. NIPSCO’s proposal will result in a higher rate increase for residential single-  
19 family customers. Under NIPSCO’s proposed rates, residential single-family  
20 customers will pay approximately 12.96% more per kWh than multi-family

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<sup>23</sup> Taylor Direct, p. 56, l. 17 through p. 57, l. 11.

<sup>24</sup> *Id.*, p. 57, ll. 1-3.

<sup>25</sup> *Id.*, p. 57, ll. 3-5.

<sup>26</sup> *Id.* p. 57, ll. 6-11.

1 customers.<sup>27</sup> Consistent with the ratemaking principle of gradualism and Mr.  
2 Deupree's recommendation, if the Commission approves a separation of single-  
3 family and multi-family customers, any single customer class should not receive an  
4 increase greater than 1.15 times the overall system average.<sup>28</sup> Finally, single-family  
5 and multi-family rates should be developed using the pertinent cost of service  
6 methodologies Mr. Deupree recommends.

7 **Q: Will NIPSCO soon have a better opportunity to capture the information as to**  
8 **whether a customer is multi-family or single-family and the load, peak, and**  
9 **hourly usage characteristics of these customers?**

10 **A:** Yes. NIPSCO has previously submitted testimony stating that with, and after, full  
11 deployment of AMI meters it will be able to capture information and data both with  
12 respect to identifying subclasses of residential customers and as to the hourly load  
13 characteristics of those customers. In Cause No. 45772, NIPSCO described how  
14 this information might then be gathered. Ms. Whitehead explained:

15 As NIPSCO noted in response to CAC in discovery, NIPSCO does  
16 not currently have complete data in its CIS as to whether a residence  
17 is single family, condominium, multi-family apartment, etc.  
18 However, as part of the deployment of its AMI meters, NIPSCO is  
19 working to determine if it is feasible for contractors—who will be  
20 visiting each customer's home—to capture this information as part  
21 of the AMI deployment in 2024-2026.<sup>29</sup>

22 NIPSCO'S AMI deployment has been underway since March 2024.<sup>30</sup> It

23 would be prudent for NIPSCO to complete the deployment of the AMI system to

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<sup>27</sup> (\$0.198605-\$0.175825)/\$0.175825. See, also, Whitehead Direct, Attachment 2-C, Original Sheet No. 48 and 49.

<sup>28</sup> Public's Exhibit No. 12, Verified Direct Testimony of Michael Deupree, p. 3, ll. 7-9.

<sup>29</sup> Cause No. 45772, Rebuttal Testimony of Erin E. Whitehead, p. 25, ll. 7-12.

<sup>30</sup> <https://www.nipsco.com/services/work-in-your-neighborhood/advanced-metering-ami>

1 propose a multi-family rate. AMI will allow NIPSCO to capture precise hourly  
2 usage data and construct more accurate load curves for the proposed residential  
3 customer classes.<sup>31</sup> These more accurate load curves will allow for more precise  
4 understanding of a customer's cost to serve. Proposing a multi-family rate after the  
5 deployment of AMI would also allow NIPSCO to assign rates based on actual  
6 hourly usage history rather than estimates associated with a limited sample.

7 Using AMI data in conjunction with monthly billing data and load research  
8 sample meter data over a longer period of time than one year will also alleviate  
9 weather deviations for a more accurate study.

#### IV. RECOMMENDATIONS

10 **Q: Please summarize your recommendations to the Commission.**

11 A: I recommend the Commission not approve NIPSCO's proposed Multi-Family Rate  
12 615. Completing AMI deployment will allow for a more robust study on which to  
13 determine the appropriateness of such a rate. Extrapolating the system usage of all  
14 multi-family customers from such a small sample introduces the risk of creating a  
15 new single-family and multi-family customer subsidy, rather than eliminating any  
16 intraclass subsidy.

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

18 A: Yes.

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<sup>31</sup> Cause No. 45557, Direct Testimony of Matthew G. Holtz, pp. 15-16.

**APPENDIX A**

**QUALIFICATIONS OF JOHN W. HANKS**

1 **Q: Please describe your background and experience.**

2 A: I graduated from Indiana University-Purdue University Indianapolis with a

3 Bachelor of Arts in Quantitative Economics, with minors in math and philosophy.

4 I began my career with the OUCC in 2022 as a Utility Analyst II, focusing on

5 economics and finance in the Electric Division. In the summer of 2022, I attended

6 the Institute of Public Utilities' Annual program on Regulatory Fundamentals. In

7 the fall of 2022, I participated in the Indiana Energy Conference organized by

8 Indiana Industrial Energy Consumers. In March of 2023, I completed a 12-week

9 course with Scott Hempling on Regulating Utility Performance. In May of 2024, I

10 completed Rate School training through the National Association of Regulatory

11 Utility Commissioners. More recently I have completed work as to IRP modeling

12 DSM modeling, and I have participated, and provided testimony, in Commission

13 docketed cases, including financing cases and base rate cases.

14 **Q: Have you previously filed testimony in other Commission proceedings?**

15 A: Yes.

**AFFIRMATION**

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



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John W. Hanks  
Utility Analyst II  
Indiana Office of Utility Consumer Counsel  
Cause No. 46120  
NIPSCO, LLC

Date: December 19, 2024

## CERTIFICATE OF SERVICE

This is to certify that a copy of the **Indiana Office of Utility Consumer Counselor Public's Exhibit No. 10 Testimony of OUCC Witness John W. Hanks** has been served upon the following counsel of record in the captioned proceeding by electronic service on December 19, 2024.

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