
VERIFIED SUPPLEMENTAL DIRECT TESTIMONY OF ALISON M. BECKER

1 **Q1. Please state your name, business address and job title.**

2 A1. My name is Alison M. Becker. My business address is 150 W. Market Street, Suite
3 600, Indianapolis, Indiana 46204. I am employed by Northern Indiana Public
4 Service Company LLC ("NIPSCO") as Manager of Regulatory Policy.

5 **Q2. Are you the same Alison M. Becker who prefiled direct testimony in this Cause?**

6 A2. Yes.

7 **Q3. What is the purpose of your supplemental direct testimony in this proceeding?**

8 A3. The purpose of my supplemental direct testimony is to provide additional
9 information relating to NIPSCO's shift in the in-service date of its proposed
10 natural gas combustion turbine ("CT") peaker plant (the "CT Project") on available
11 property at NIPSCO's R.M. Schahfer Generating Station ("Schahfer") site from end
12 of year 2026 to end of year 2027. Specifically, I describe NIPSCO's Integrated
13 Resource Plan ("IRP") process and the expected timing of the 2024 IRP. To ensure
14 NIPSCO remains in compliance with the Commission's General Administrative
15 Order 2022-01 ("GAO 2022-01"), I also describe NIPSCO's follow-up contact with
16 Midcontinent Independent System Operator, Inc. ("MISO") in light of the shift in

1 the in-service date.

2 **Q4. Are you sponsoring any attachments to your supplemental direct testimony?**

3 A4. Yes. I am sponsoring Attachment 1-S-A, which was prepared by me or under my
4 direction and supervision.

5 **Q5. Please provide a general description of NIPSCO's IRP process.**

6 A5. In accordance with the Commission's "Guidelines for Integrated Resource
7 Planning by an Electric Utility" (170 IAC 4-7 *et seq.*) ("IRP Rule"), NIPSCO submits
8 an IRP to the Commission at least every three years. NIPSCO submitted its most
9 recent IRP on November 15, 2021. The IRP is NIPSCO's assessment of a variety of
10 demand- and supply-side resources to reliably and cost-effectively meet customer
11 electricity service needs. The IRP process strives to: (1) evaluate available options,
12 from both the supply- and demand-sides, in a fair and consistent manner; (2)
13 provide safe, reliable, and cost-effective service to customers; and (3) create a
14 flexible plan that allows for review as needed, based on changing circumstances
15 and new information.

16 **Q6. When does NIPSCO expect to begin its 2024 IRP process?**

17 A6. NIPSCO endeavors to engage in a robust IRP stakeholder process that typically
18 exceeds the requirements of the IRP Rule. During the 2021 process, NIPSCO's first

1 meeting was held in March, and a total of five meetings and a technical webinar
2 were held. While the calendar for the 2024 stakeholder process has not been
3 finalized, NIPSCO will seek to engage stakeholders throughout the process. From
4 a technical standpoint, work has already begun gathering data for the analytical
5 process that will begin in early 2024 and continue throughout the year until the
6 anticipated submission by November 1, 2024.

7 **Q7. Does a 2027 in-service date for the CT Project change the conclusion in NIPSCO**
8 **Witness Walter's direct testimony (at Question / Answer 20) that NIPSCO**
9 **cannot wait until its 2024 IRP is complete to seek approval of the CT Project?**

10 **A7.** No. NIPSCO Witness Walter noted that waiting until after NIPSCO's 2024 IRP is
11 complete to make a CPCN filing to seek approval of the CT Project would mean
12 that a Commission Order could not reasonably be expected until late 2025. As
13 NIPSCO Witness Baacke explains in his supplemental testimony, and consistent
14 with the schedules sponsored by NIPSCO Witness Blissmer in his supplemental
15 testimony, NIPSCO must make certain financial commitments in 2024 and 2025 to
16 preserve the 2027 in-service date of the CT Project. In fact, the need for a timely
17 order from the Commission for the CT Project—which will allow NIPSCO to
18 continue project development and make the necessary financial commitments to

1 ensure a 2027 in-service date—is even more acute in light of the lengthy timelines
2 to procure key equipment, as further discussed by NIPSCO Witness Baacke.

3 Delaying this proceeding beyond the 2024 IRP jeopardizes making those
4 commitments, which threatens the 2027 in-service date, and, as NIPSCO Witness
5 Stanley explains, endangers NIPSCO's ability to make use of the existing
6 interconnection rights at the Schahfer site. Delaying this proceeding beyond
7 NIPSCO's 2024 IRP is not necessary, particularly considering that the 2021 IRP
8 identified a need for the CT Project and the 2023 portfolio analysis both supports
9 and informs NIPSCO's proposed CT Project.

10 **Q8. Given the guidelines for additional evidence in electric generation proceedings**
11 **established in GAO 2022-01, did NIPSCO update MISO that the CT Project is**
12 **now expected to be in-service by year end 2027?**

13 A8. Yes. GAO 2022-01 provides guidelines for additional evidence to be provided in
14 connection with certain petitions regarding electric generation under Ind. Code
15 chs. 8-1-8.5 and 8-1-8.8, including the "RTO's response" to a request for "a
16 qualitative assessment by the RTO regarding the new generation." The Affidavit
17 of Andy Witmeier, Director of Resource Utilization for MISO, providing a
18 qualitative assessment provided by MISO regarding the new generation,

1 including NIPSCO's request to MISO (Exhibit 1 to the Affidavit) was included in
2 my direct testimony in this Cause as Attachment 1-G. Out of an abundance of
3 caution, NIPSCO notified MISO of the 2027 in-service date for the proposed CT
4 Project on December 21, 2023. NIPSCO's December 21, 2023 communication to
5 MISO is attached as Attachment 1-S-A. To date, MISO has not indicated that any
6 changes are necessary to Mr. Whitmer's affidavit.

7 **Q9. Why did NIPSCO choose to file supplemental direct testimony and modify the**
8 **procedural schedule, rather than simply updating the Commission and**
9 **stakeholders in its rebuttal testimony?**

10 A9. As NIPSCO received updated information—including the supply chain issues
11 discussed by NIPSCO Witness Baacke and MISO market information discussed by
12 NIPSCO Witnesses Stanley and Augustine—NIPSCO evaluated it to determine
13 the best path forward for NIPSCO and its customers. Following this evaluation
14 and the conclusion that a shift to the in-service date was the most prudent path
15 forward, NIPSCO determined it was best to promptly inform the Commission and
16 stakeholders about the modification and then to file supplemental testimony, as
17 opposed to allowing stakeholders to file their cases-in-chief in December and then
18 including this updated information in rebuttal. It was NIPSCO's goal to fully

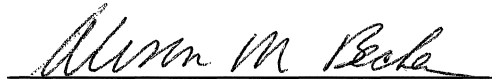
1 explain the related facts and decision, allow stakeholders an opportunity to
2 understand and respond to this information, and, importantly, ensure the record
3 of this proceeding was as complete as possible for the Commission as it makes its
4 ultimate decision about NIPSCO's request. NIPSCO appreciates the willingness
5 of stakeholders to work together on reaching an agreement that was acceptable to
6 all parties and the Commission's flexibility in considering the modified procedural
7 schedule.

8 **Q10. Does this conclude your prefiled supplemental direct testimony?**

9 A10. Yes.

VERIFICATION

I, Alison M. Becker, Manager of Regulatory Policy for Northern Indiana Public Service Company LLC, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, reading "Alison M. Becker", is written over a solid horizontal line.

Alison M. Becker

Date: January 16, 2024

From: Little \ Michael Bryan
Sent: Thursday, December 21, 2023 9:05 AM
To: Bob Kuzman <bkuzman@misoenergy.org>
Subject: NIPSCO's Gas Peaker CPCN Filing

As we discussed this morning, we wanted to make sure that Andrew Whitmer is aware of a change NIPSCO will be making in its gas peaker CPCN filing at the IURC. Our original in-service date was targeted as end of year 2026; however, based on some supply chain constraints, NIPSCO will be filing supplemental testimony on January 16 that changes the targeted in-service date to not-later-than end of year 2027.

We do not believe any change is necessary to Mr. Whitmer's affidavit, as it only included two general references to the EOY 2026 in-service date, which it clearly stated as what NIPSCO told MISO. However, we did want to make you aware of the change. If you do think a change to the affidavit is needed, we're open to discussing.

M. Bryan Little
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Have a concern? Need to report confidentially and/or anonymously? Click below.

