

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

**VERIFIED PETITION OF NORTHERN INDIANA PUBLIC )  
SERVICE COMPANY LLC FOR (1) ISSUANCE OF A )  
CERTIFICATE OF PUBLIC CONVENIENCE AND )  
NECESSITY (“CPCN”) PURSUANT TO IND. CODE CH. )  
81-8.5 TO CONSTRUCT AN APPROXIMATELY 400 )  
MEGAWATT NATURAL GAS COMBUSTION TURBINE )  
 (“CT”) PEAKING PLANT (“CT PROJECT”); (2) )  
APPROVAL OF THE CT PROJECT AS A CLEAN )  
ENERGY PROJECT AND AUTHORIZATION FOR )  
FINANCIAL INCENTIVES INCLUDING TIMELY COST ) **CAUSE NO. 45947**  
RECOVERY THROUGH CONSTRUCTION WORK IN )  
PROGRESS RATEMAKING UNDER IND. CODE CH. 8-1- )  
8.8; (3) AUTHORITY TO RECOVER COSTS INCURRED )  
IN CONNECTION WITH THE CT PROJECT; (4) )  
APPROVAL OF THE BEST ESTIMATE OF COSTS OF )  
CONSTRUCTION ASSOCIATED WITH THE CT )  
PROJECT; (5) AUTHORITY TO IMPLEMENT A )  
GENERATION COST TRACKER MECHANISM (“GCT )  
MECHANISM”); (6) APPROVAL OF CHANGES TO )  
NIPSCO'S ELECTRIC SERVICE TARIFF RELATING TO )  
THE PROPOSED GCT MECHANISM; (7) APPROVAL OF )  
SPECIFIC RATEMAKING AND ACCOUNTING )  
TREATMENT FOR THE CT PROJECT; AND (8) )  
ONGOING REVIEW OF THE CT PROJECT, ALL )  
PURSUANT TO IND. CODE CH. 8-1-8.5 AND 8-1-8.8, AND )  
IND. CODE §§ 8-1-2-0.6 AND 8-1-2-23. )**

**MOTION FOR LEAVE TO LATE FILE CUSTOMER COMMENTS**

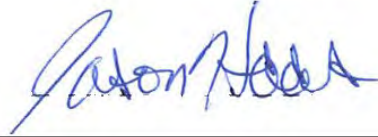
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Comes now, the Indiana Office of Utility Consumer Counselor (“OUCC”), by counsel, and files this Motion for Leave to Late File Customer Comments. The OUCC’s direct testimony was due on Tuesday, April 16, 2024. While the OUCC filed its initial testimony in this proceeding, the customer comments were inadvertently omitted. Public's Exhibit No. 6, OUCC's Customer Comments, is included with this Motion. Accordingly, the OUCC moves for leave to late file the customer comments. The OUCC is authorized to represent that no party objects to this motion.

WHEREFORE, the OUCC requests the Commission grant the OUCC’s Motion to late file the customer comments in this proceeding.

Respectfully submitted,

**Indiana Office of Utility Consumer Counselor**



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T. Jason Haas

Attorney No. 34983-29

Deputy Consumer Counselor

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing *Motion for Leave to Late File Customer Comments* has been served upon the following counsel of record in the captioned proceeding by electronic service on April 19, 2024.

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**STATE OF INDIANA  
INDIANA UTILITY REGULATORY COMMISSION**

VERIFIED PETITION OF NORTHERN INDIANA PUBLIC )  
SERVICE COMPANY LLC FOR (1) ISSUANCE OF A )  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY )  
("CPCN") PURSUANT TO IND. CODE CH. 81-8.5 TO )  
CONSTRUCT AN APPROXIMATELY 400 MEGAWATT )  
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PROGRESS RATEMAKING UNDER IND. CODE CH. 8-1-8.8; (3) )  
AUTHORITY TO RECOVER COSTS INCURRED IN )  
CONNECTION WITH THE CT PROJECT; (4) APPROVAL OF )  
THE BEST ESTIMATE OF COSTS OF CONSTRUCTION )  
ASSOCIATED WITH THE CT PROJECT; (5) AUTHORITY TO )  
IMPLEMENT A GENERATION COST TRACKER MECHANISM )  
("GCT MECHANISM"); (6) APPROVAL OF CHANGES TO )  
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PROPOSED GCT MECHANISM; (7) APPROVAL OF SPECIFIC )  
RATEMAKING AND ACCOUNTING TREATMENT FOR THE CT )  
PROJECT; AND (8) ONGOING REVIEW OF THE CT PROJECT, )  
ALL PURSUANT TO IND. CODE CH. 8-1-8.5 AND 8-1-8.8, AND )  
IND. CODE §§ 8-1-2-0.6 AND 8-1-2-23. )

CAUSE NO. 45947

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S  
PUBLIC'S EXHIBIT NO. 6  
OUCC'S CONSUMER COMMENTS**

Respectfully submitted,



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T. Jason Haas  
Deputy Consumer Counselor  
Attorney No. 34983-29

**From:** [Susan Thomas](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Susan Thomas - Cause No. 45947 Public Comment  
**Date:** Tuesday, March 19, 2024 3:05:13 PM

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Libré Booker, Director of Outreach for Just Transition Northwest Indiana delivered the following statement at the IURC/OUCC NIPSCO Cause #45947 Public Comment Meeting, March 14, on behalf of Just Transition Northwest Indiana, an environmental justice organization serving Lake, Porter, and LaPorte Counties:

In 2016, the Indiana legislature [passed a measure](#) requiring utilities to ensure "the affordability of utility services for present and future generations of Indiana citizens." It then bolstered that protection with additional language last year.

NIPSCO is violating that measure in Cause Number 45947, its request to IURC to build an unnecessary peaker plant to the base cost of 641.2 MILLION dollars, with a 30 percent possible additional cost to consumers who will start to pay for this even before the plant is built, thanks to unethical Cost While In Progress legislation passed last year.

NIPSCO has never before built its own gas plant—what could go wrong? Look no further than the [Duke Energy Edwardsport coal-to-gas plant](#), which went 1.5 billion dollars over budget charged to consumers. We cannot allow the fox to continue to guard the henhouse, as NIPSCO has proven to be a dangerous and untrustworthy neighbor.

- As we speak, there is another NIPSCO meeting with EPA and the Town of Pines—where NIPSCO poisoned the town's soil and water supply yet still refuses to pay for municipal water hookups to 38 homes whose wells they poisoned. Those residents must rely on bottled water.
- They refuse to clean up tons of toxic coal ash on the shore of Lake Michigan at the Michigan City Generating Station, even as the condition of the seawall deteriorates and is downgraded, potentially poisoning the drinking water for 10 million people.
- Consumers are charged monthly to pay for NIPSCO's industry lobbyists suing to keep gas stoves, proven last summer to be a source of secondhand carcinogens, in consumer circulation.
- NIPSCO promised net zero emissions by 2040, and now they are backtracking on

their promise to transition to renewable energy. Continuing to use dirty fossil fuels at this point is a dangerous solution to meet peak demands when a variety of other solutions exist at a lower cost, such as renewables with battery storage and better energy efficiency programs.

We are tired of the non-stop rate hike requests for unethical and profit-motivated ends to a company making record profits, and we respectfully request you deny this request.

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**Susan Thomas (she/her)**  
**Director of Legislation & Policy/Press**  
**Just Transition Northwest Indiana**  
**847-767-1870 | Central Time**

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April 4, 2024

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Re: Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant (Case No. 45947)

Advanced Energy United (“United”)<sup>1</sup> appreciates the opportunity to provide comments on Northern Indiana Public Service Company LLC’s (“NIPSCO” or the “Company”) September 12, 2023 petition for a Certificate of Public Convenience and Necessity (“CPCN”) for an approximately 400-megawatt (“MW”) natural gas combustion peaking plant (“Project” or “Peaker”) with the Indiana Utility Regulatory Commission (“Commission”). As it considers NIPSCO’s request, United encourages the Commission to bear in mind the five energy policy pillars laid out by the 21<sup>st</sup> Century Energy Policy Development Task Force. Adherence to the principles of reliability, resilience, stability, affordability, and environmental sustainability<sup>2</sup> obligate the Commission to deny authority to construct the Peaker. Indiana holds significant untapped potential for deploying advanced energy resources that would obviate or reduce any purported need for supplemental fossil fuel-based generation, yet there is no indication that NIPSCO considered the collective implementation of advanced energy resources as an alternative to the proposed Project. Without evaluating such tools and resources as demand-side management and energy storage collectively, NIPSCO has failed to act in its customers’ interests.

The Commission has two paths to rejecting the Peaker. Under the first path, the Commission could consider in the pending docket all options and scenarios for addressing any need for additional capacity during times of grid constraint. Such a comparative evaluation of options will demonstrate that the Project is not in the interest of NIPSCO’s customers and thus warrants rejection. Under the second path, the Commission could reject the petition and direct NIPSCO to incorporate any additional capacity it believes it needs in its upcoming integrated

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<sup>1</sup> Advanced Energy United is a national business association representing leading companies in the advanced energy industry. United supports a broad portfolio of technologies, products, and services that enhance U.S. competitiveness and economic growth through an efficient, high-performing energy system that is clean, secure, and affordable.

<sup>2</sup> Indiana Office of Energy Development. (n.d.). Electricity. <https://www.in.gov/oed/indianas-energy-policy/electricity/>.

resource plan (“IRP”) filing this November 1.<sup>3</sup> Under this approach, NIPSCO can conduct and present a full evaluation of its resources and allow for greater public input before making such a long-term, expensive, and fossil fuel-based investment. While United prefers the more wholistic approach under the second option, under either scenario, it is critical that the Commission direct NIPSCO to evaluate advanced energy alternatives to properly fulfill the ideals of the five pillars and provide the electric service that Hoosiers deserve.

## Comments

### *Project Management*

As a preliminary matter, NIPSCO’s proposal to self-build the Project<sup>4</sup> should cause the Commission to pause. NIPSCO has not previously engaged in self-built gas plant projects, yet now proposes to collect from ratepayers \$1,609,808,326<sup>5</sup> for a project of questionable long-term value. Similarly situated utilities typically utilize a firm for engineering, procurement, and construction (a/k/a “EPC”) when undertaking such projects. The contractual framework in an EPC contract enables the utility to transfer the complete risk of design, procurement, and construction to the contractor. In this situation, however, the Company has chosen to retain the risk without demonstrating experience with projects of this magnitude, cost, and complexity. The Commission should seriously consider the risk to ratepayers stemming from delays and cost overruns before sanctioning an endeavor where the Company could have opted for a less risky path but chose not to. NIPSCO’s proposed delay of the in-service date from 2026 to 2027 had already cost customers an additional \$14.9 million in financing costs.<sup>6</sup>

### *Stranded Asset Risk*

As a peaker plant, the Project is designed as a 400 MW occasionally used generation resource. Due to the rapidly expanding nature of advanced energy technologies, such as, but not limited

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<sup>3</sup> Indiana Utility Regulatory Commission. (n.d.). Integrated Resource Plans. [https://www.in.gov/iurc/energy-division/electricity-industry/integrated-resource-plans/#Northern\\_Indiana\\_Public\\_Service\\_Company\\_\\_NIPSCO\\_](https://www.in.gov/iurc/energy-division/electricity-industry/integrated-resource-plans/#Northern_Indiana_Public_Service_Company__NIPSCO_); Northern Indiana Public Service Company LLC. (2022, March 29). Indianapolis, Indiana, available at [https://www.in.gov/iurc/files/NIPSCO\\_2022-IRP-Extension-Request\\_03292022.pdf](https://www.in.gov/iurc/files/NIPSCO_2022-IRP-Extension-Request_03292022.pdf).

<sup>4</sup> Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of David T. Walter (NIPSCO Exhibit 2), p. 30, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>5</sup> Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Supplemental Testimony of Kevin J. Blissmer (NIPSCO Exhibit 8-S), p. 3, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>6</sup> *Ibid.*, p. 5.





to, solar, wind, energy storage, virtual power plants, and aggregated demand response (“DR”), and the apparent failure to consider such technologies in a comprehensive nature, there is no reason to expect this Peaker to be cost-effective or environmentally sustainable now, let alone in the future. This means that the Project will be a stranded asset sooner rather than later, imposing a burden on NIPSCO’s customers to pay for an inefficient, unnecessary asset. NIPSCO’s shortsightedness is compounded by the influx of the new federal dollars coming to utilities and Indiana under the Inflation Reduction Act. With these dollars, there is no reason that NIPSCO could not find a reliable, less expensive, and more sustainable alternative to the Project.<sup>7</sup>

### *Fossil Fuel Risks*

NIPSCO’s reliance on natural gas exposes its customers to additional cost and reliability risks. While often characterized as a low-cost fuel, natural gas prices can fluctuate significantly. The recent upward trend in monthly average prices have been caused by a variety of factors, including the Russian war in Ukraine, extreme weather events, fuel delivery and availability issues, among others.<sup>8</sup> Exposing customers to volatile natural gas prices is unwarranted and unnecessary given the alternatives available in the form of advanced energy resources. Even with the best attempts to hedge, over the life of such an occasionally used resource, customers will be exposed to unpredictable fuel price fluctuations.<sup>9</sup> Setting aside price fluctuations brought on by extreme weather events, delivery of gas and gas plant operation has been problematic during extreme weather events as well, especially during winter months. Winter Storm Elliot in North Carolina, for example, demonstrated that fossil fuel plants are less reliable than predicted.<sup>10</sup> In contrast, energy storage and renewable energy sources based in Indiana, serviced by Hoosiers, and increasingly made in the United States present an

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<sup>7</sup> For further information and analysis, please see United’s Assessment of Clean Energy Alternative to Natural Gas Resources for the Duke Energy Indiana Combined Cycle Project report from 2023. Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://blog.advancedenergyunited.org/reports/assessment-of-clean-energy-alternatives-to-new-natural-gas-resources>, p. 4-5.

<sup>8</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Part 2 Northern Indiana Public Service Company, Indiana Michigan Power, and CenterPoint Energy Combustion Turbine Projects. (May 2023) *Advanced Energy United*, [https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202\\_Strategenedits%204.13%20final%20draft.pdf](https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202_Strategenedits%204.13%20final%20draft.pdf), p. 30, Figure 20.

<sup>9</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://blog.advancedenergyunited.org/reports/assessment-of-clean-energy-alternatives-to-new-natural-gas-resources>, p. 9.

<sup>10</sup> Sorg, L. (2023, January 4). Several crises and malfunctions at Duke Energy led to rolling blackouts on Christmas Eve, utility officials told state regulators. *NC Newsline*. Retrieved from <https://ncnewsline.com/2023/01/04/several-crises-malfunctions-at-duke-energy-led-to-rolling-blackouts-on-christmas-eve-utility-officials-tell-state-regulators/>.



alternative worth considering. By choosing advanced energy resources, the Company can eliminate many of the risks associated with fossil fuel-powered plants while still fostering economic development and jobs.

### *NIPSCO's Climate Goals*

The Project runs afoul of Indiana's energy pillars and NIPSCO's own goals. NIPSCO's parent company, NiSource, has committed to reaching net zero greenhouse gas emissions by 2040,<sup>11</sup> with NIPSCO specifically committing to reducing emissions by 90% by 2030.<sup>12</sup> Additionally, NiSource's plan calls for "a balanced mix of low- or zero-emission electric generation." Thus, it is hard to see how expanded reliance on natural gas does not jeopardize NIPSCO's and its parent company's overall goals.

### *Hydrogen Red Herring*

The Company notes that the Peaker will be capable of using a blend of hydrogen,<sup>13</sup> but even blended fuels do not completely sever NIPSCO from using fossil fuels to power this Project. NIPSCO witness David Walter testifies that currently, the combustion turbines "being considered are capable of operating on natural gas fuel blended with between 15 and 35% hydrogen."<sup>14</sup> He goes on to mention that the Peaker could possibly burn 100% hydrogen in the future with modifications. At no point, however, does he commit NIPSCO to using hydrogen. Even if hydrogen is eventually used, it would have to be green hydrogen to meet the above-mentioned climate goals. The notion of incorporating green hydrogen, however, suffers at this time from unknown future capital costs, unknown fuel prices, and, significantly, unknown availability.<sup>15</sup>

Should NIPSCO find itself needing to use hydrogen under its own climate goals or other regulations, in the absence of green hydrogen, the Company would likely have to offset its carbon emissions elsewhere, including the use of carbon capture and sequestration ("CCS"). CCS, however, can be costly. For example, CCS is currently estimated to cost approximately

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<sup>11</sup> NiSource. (2022, November 7). *Path to Net Zero Greenhouse Gas Emissions*. News. <https://www.nisource.com/news/article/path-to-net-zero-greenhouse-gas-emissions>.

<sup>12</sup> Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of David T. Walter (NIPSCO Exhibit 2), p. 21, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>13</sup> *Ibid.*

<sup>14</sup> *Ibid.*, p. 29.

<sup>15</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://blog.advancedenergyunited.org/reports/assessment-of-clean-energy-alternatives-to-new-natural-gas-resources>, p. 15.



\$900/kW.<sup>16</sup> These costs do not even consider the expense of storing captured carbon or related enabling infrastructure needed to make CCS a reality.<sup>17</sup>

### *Alternatives that Warrant Consideration in NIPSCO's Forthcoming IRP*

When it denies NIPSCO's petition, the Commission should provide the Company with clear guidance regarding what it expects in any subsequent request for authority to construct new generation. If the Commission directs NIPSCO to reevaluate the Peaker proposal in its 2024 IRP, as is logical, the Company should consider the Peaker in the context of its whole fleet. This is warranted since NIPSCO witness Patrick Augustine acknowledges that there have been significant developments since the Company's last IRP in 2021.<sup>18</sup>

Among the specific directions that the Commission should provide is instruction to consider energy efficiency ("EE") and DR *in conjunction with* additional renewable generation and energy storage. United recognizes that NIPSCO considered EE and DR in preparing its 2021 IRP.<sup>19</sup> When these resources are examined alone, it would not be surprising if EE or DR did not satisfy NIPSCO's projected resource needs. But through expansion of its existing EE and DR programs and creation of new programs, such as allowing third-party DR aggregation, coupled with additional renewable generation and energy storage, the purported need for 400 MW of intermittent gas generation at a cost of over \$1.6 billion may be avoided or reduced.

The Commission should also recognize that programs promoting behind-the-meter generation and storage, third-party developed true community solar, and green tariffs with the flexibility to spur more renewable generation as demand warranted would help address NIPSCO's supply needs and likely at a lower cost to NIPSCO's ratepayers than the projected \$1.6 billion cost for the Peaker. Operating expenses associated with the use of such resources would also likely compare well to fuel costs and operating expenses associated with the Project. Additionally, the Commission should instruct NIPSCO to investigate opportunities under the Inflation Reduction Act, which was enacted after the Company's 2021 IRP.

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<sup>16</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Alternatives%20to%20New%20Natural%20Gas%20Resources.pdf> , p. 15-16.

<sup>17</sup> *Ibid.*, p. 17.

<sup>18</sup> Indiana Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of Patrick N. Augustine (NIPSCO Exhibit 7), p. 24, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>19</sup> Indiana Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of Alison M. Becker (NIPSCO Exhibit 1), p. 10-19, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.



Another compelling option that the Commission should look at is utility-scale storage options, as they can be designed to be equivalent in capacity and are more economical than combustion turbines (“CT”) in Indiana.<sup>20</sup> The attached United study comparing NIPSCO’s construction of a CT and utility-scale storage found that in all of the planning scenarios, battery storage provided an average net savings of \$3.43 million.<sup>21</sup> Similar savings for ratepayers were seen when looking at Indiana Michigan Power Company (\$66.2 million) and CenterPoint Energy (\$3.5 million).<sup>22</sup> Additionally, since utility-scale storage is future-looking and is useful in a variety of advanced energy solutions, it avoids the stranded asset risk of early retirement of a gas peaker plant and an unnecessary burden on ratepayers.<sup>23</sup> Finally, utility-scale batteries have not only monetary advantages but also negate many of the reliability and fuel risk issues described above. This is because once a battery is installed, its operation and reliability is not affected by external conditions, such as imported fuel constraints<sup>24</sup> or extreme temperatures.<sup>25</sup>

The only way to realize the benefits of these alternatives and opportunities is a global examination of all of NIPSCO’s options. Following such a comprehensive evaluation by NIPSCO and the vetting that occurs in a litigated CPCN proceeding, the Commission can make a better-informed decision about future CPCN requests from the Company. Adopting this course improves the chances that all stakeholders come together to make the best choices for NIPSCO’s ratepayers now and into the future.

## Conclusion

United recognizes the significant work NIPSCO did to prepare the petition. However, as detailed, there are marketplace, cost, and clean energy justifications for denying the petition and directing NIPSCO to take a more comprehensive view of the available means to meet its resource needs. United respectfully urges the Commission to enter an order in this matter consistent with the recommendations contained herein. Doing so will ensure that Indiana’s five energy policy pillars are respected and Hoosier’s interests are protected.

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<sup>20</sup> This is especially true with the numerous federal funding programs. See Assessment of Clean Energy Alternatives to New Natural Gas Resources: Part 2 Northern Indiana Public Service Company, Indiana Michigan Power, and CenterPoint Energy Combustion Turbine Projects. (May 2023) *Advanced Energy United*, [https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202\\_Strategenedits%204.13%20final%20draft.pdf](https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202_Strategenedits%204.13%20final%20draft.pdf), p. 1.

<sup>21</sup> *Ibid.*, p. 9.

<sup>22</sup> *Ibid.*, p. 1.

<sup>23</sup> *Ibid.*, p. 18.

<sup>24</sup> *Ibid.*, p. 30.

<sup>25</sup> *Ibid.*, p. 17.



Respectfully submitted,

**Michael J. Weiss, Principal**

Advanced Energy United

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Note: an attachment provided by Advanced Energy United was included and can be found at the end of this document beginning on page 135, with the cover correspondence also duplicated there.

**From:** [noreply@in.accessgov.com](mailto:noreply@in.accessgov.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** Donald R. Dixon  
**Date:** Monday, December 11, 2023 10:27:51 AM

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Title: Mr.  
Name: Donald R. Dixon  
Email: [dinojd59@gmail.com](mailto:dinojd59@gmail.com)  
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Address: 1235 N. 575 East

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46391

Utilities: NIPSCO

Type of Inquiry: Case Comment

Comments: I oppose NIPSCO's construction of a gas-powered electric plant due to the proposed fluidity of rate hikes. NIPSCO should not have unbridled authority to raise rates as frequently as every 6 months. NIPSCO should be permitted for o recover its costs and realize a rate of return consistent with market indices such as government bond rates, etc.

**From:** [noreply@in.accessgov.com](mailto:noreply@in.accessgov.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** Ralph C. Howard and Diane S. Howard  
**Date:** Tuesday, December 19, 2023 9:48:10 AM

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A form has been submitted for: OUCC Contact Form  
Please review the attached PDF for the submission information.

Title:  
Name: Ralph C. Howard and Diane S. Howard  
Email: ralphndianehoward@comcast.net  
Phone:  
Address: 4684 N. 600 W.

LaPorte  
IN  
46350  
Utilities: NIPSCO  
Type of Inquiry: Case Comment  
Comments: Regarding the petition by NIPSCO to construct a new gas-fired power plant near Wheatfield, we feel that they should not be given the ability to raise electrical utility bills at their whim every six months if they so desire. In that scenario, poor planning and mismanagement would just be consistently passed along to the defenseless consumers. More renewable power solutions should be pursued.



**From:** [Jan Parr](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jan Parr - IURC Cause No. 45947  
**Date:** Monday, December 11, 2023 5:25:31 PM

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I am writing to oppose this project : NIPSCO is proposing to self-build a \$643.7 million 400-megawatt natural gas peaker plant at the Schahfer Generating Station in Wheatfield/Jasper County that would only operate possibly 20% of the time though multiple sustainable options are available to implement during "peak" occurrences. A new gas plant built during concerted global efforts to phase them out **will extend the use of fossil fuel by decades.**

**Thank you**  
**Jan Parr**  
**368 E St Clair Ave**  
**Beverly Shores IN. 46301**

**From:** [noreply@in.accessgov.com](mailto:noreply@in.accessgov.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** Patricia E. Jackson  
**Date:** Monday, December 11, 2023 12:22:23 PM

---

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A form has been submitted for: OUCC Contact Form  
Please review the attached PDF for the submission information.

Title: Mrs.  
Name: Patricia E. Jackson  
Email: [pejackson58@hotmail.com](mailto:pejackson58@hotmail.com)  
Phone: (219) 929-5707  
Address: 466 E Burdick Rd

Chesterton

IN

46304

Utilities: NIPSCO

Type of Inquiry: Case Comment

Comments: I am concerned about NIPSCO's request to build a natural gas plant for \$641.2 million. To invest that much money and resources with the use of the fossil fuel of natural gas seems irresponsible and not a plan for the future. Our children and earth deserve renewable energy sources and responsible research for that development. Thank you for reading my comment.

**From:** [noreply@in.accessgov.com](mailto:noreply@in.accessgov.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** Pete Beda  
**Date:** Sunday, December 17, 2023 7:36:16 PM

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A form has been submitted for: OUCC Contact Form  
Please review the attached PDF for the submission information.

Title: Mr.  
Name: Pete Beda  
Email: [79qukm93@duck.com](mailto:79qukm93@duck.com)  
Phone: (219) 659-8599  
Address: 2610 White Oak Avenue

Whiting

IN

46394

Utilities: NIPSCO

Type of Inquiry: Case Comment

Comments: In the matter of Case 45947, the proposed gas peaker generating station is a necessity, but raising rates every 6 months is not. Since the EPA is forcing closure of the coal fired generating station, let them pay for most of it.

**From:** [noreply@in.accessgov.com](mailto:noreply@in.accessgov.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** Susan Thomas - NIPSCO Cause #45947  
**Date:** Monday, October 30, 2023 11:05:55 AM

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A form has been submitted for: OUCC Contact Form  
Please review the attached PDF for the submission information.

Title: Ms.  
Name: Susan Thomas  
Email: [Susan@jtnwi.org](mailto:Susan@jtnwi.org)  
Phone: (847) 767-1870  
Address: 215 S. Broadway

Beverly Shores

IN

46301

Utilities: NIPSCO Cause #45947

Type of Inquiry: Case Comment

Comments: Reject NIPSCO's request to use CWIP to charge consumers for building a peak gas plant that will barely be used and will further use of fossil fuels! See example Edwardsport,, DUKE energy--this will ensure runaway costs Hoosiers will have to pay for while utilities reap record profits.

**From:** [Joan Crist](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Joan Crist - No more fossil fuel projects: Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Monday, March 11, 2024 10:48:32 PM

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Dear Counselor Fine,

Please no more fossil fuel projects! Climate change is destroying our planet (God's creation as I believe) and our lives. We need LESS fossil fuel power, not more! Moreover, fracking poisons water supplies and ruins ecosystems. I signed on to NIPSCO's Green power plan to do my part and support the company in shifting to renewable energy, now they want to burn natural gas? Five steps backward!

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Joan Crist  
7 Detroit St  
Hammond, IN 46320

**From:** [rmiller@everyactioncustom.com](mailto:rmiller@everyactioncustom.com) on behalf of [Russell Miller](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Russell Miller - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, February 28, 2024 8:25:00 PM

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Dear Indiana Utility Regulatory Commission,

EVERYONE will run out of gas/fossil fuels at a point in the future. If your grand children are alive will they curse all of us for not "doing something sooner"??I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Russell Miller  
51788 Meadow Knoll Dr South Bend, IN 46628-9473  
[rmiller@visitingphysicians.com](mailto:rmiller@visitingphysicians.com)

**From:** [Aaron Lehman](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Aaron Lehman - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Wednesday, March 13, 2024 9:16:33 AM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Aaron Lehman  
2528 Redspire Blvd  
Goshen, IN 46526

**From:** [Ada Williams](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Ada Williams - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Sunday, March 10, 2024 2:34:06 PM

---

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Ada Williams  
5116 E 13th Pl  
Gary, IN 46403



**From:** [Adriane Jagger](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Adriana Jagger - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, April 4, 2024 11:05:48 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Adriane Jagger  
218 S 7th St  
Chesterton, IN 46304

**From:** [Amanda Gibbs](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Amanda Gibbs - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, April 3, 2024 3:06:02 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Amanda Gibbs  
7601 W 400 N  
Michigan City, IN 46360

**From:** [Amanda Qualls](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Amanda Qualls - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, November 15, 2023 11:19:00 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Amanda Qualls  
326 N Riverside Blvd  
Goshen, IN 46528

**From:** [Anita Yoder](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Anita Yoder - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Monday, October 30, 2023 10:02:22 AM

---

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Anita Yoder  
1824 Woodgate Dr  
Goshen, IN 46526

**From:** [Ann Rak](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Ann Rak - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Friday, March 8, 2024 10:00:00 AM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Ann Rak  
2214 St John Rd  
Scherville, IN 46375

**From:** [Anna Gross](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Anna Gross - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, December 14, 2023 4:59:33 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Anna Gross  
4898 Martin Rd  
North Manchester, IN 46962

**From:** [April Valentine](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** April Valentine - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Wednesday, November 29, 2023 1:37:46 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
April Valentine  
7024 Magoun Ave  
Hammond, IN 46324

**From:** [April Valentine](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** April Valentine - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, April 2, 2024 9:38:18 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
April Valentine  
7024 Magoun Ave  
Hammond, IN 46324



**From:** [Audrey Mather](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Audrey Mather - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, November 16, 2023 12:56:30 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Audrey Mather  
902 E John St  
Nappanee, IN 46550

**From:** [barbara brouillette](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Barbara Brouillette - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Friday, March 15, 2024 1:16:05 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
barbara brouillette  
9025 Moraine St  
Dyer, IN 46311

**From:** [Bruce Outcalt](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Bruce Outcalt - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, December 14, 2023 1:16:14 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Bruce Outcalt  
4887 Stargazer Ln  
Spencer, IN 47460

**From:** [LaVonne Starks](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** LaVonne Starks - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Sunday, October 29, 2023 4:54:01 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
LaVonne Starks  
626 E 78th Pl  
Merrillville, IN 46410

**From:** [Lisa Timmerman](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Lisa Timmerman - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Sunday, March 31, 2024 1:44:13 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Lisa Timmerman  
5834 Newport Ave  
Portage, IN 46368

**From:** [Margaret Willis](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Margaret Willis - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, March 14, 2024 10:25:13 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Margaret Willis  
762 S 2nd St  
Chesterton, IN 46304

**From:** [Margaret Willis](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Margaret Willis - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, March 12, 2024 9:17:45 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Margaret Willis  
762 S 2nd St  
Chesterton, IN 46304

**From:** [Marietta Tyks](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Marietta Tyks - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, November 23, 2023 8:08:48 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Marietta Tyks  
1122 E Indiana Ave  
South Bend, IN 46613



**From:** [Patricia Hansen](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Patricia Hansen - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, February 27, 2024 7:34:57 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me. NIPSCO is taking Indiana hostage. If I had another place to go for energy, I would leave NIPSCO in a heartbeat.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Patricia Hansen  
602 D St  
La Porte, IN 46350

**From:** [Donavan Barrier](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Donovan Barrier - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, October 26, 2023 2:28:04 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Donavan Barrier  
2757 N Wozniak Rd  
Michigan City, IN 46360

**From:** [Donavan Barrier](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Donovan Barrier - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Wednesday, November 29, 2023 10:52:47 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Donavan Barrier  
2757 N Wozniak Rd  
Michigan City, IN 46360

**From:** [Donna Strauss](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Donna Strauss - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, March 28, 2024 1:19:21 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Donna Strauss  
1171 Gary Ct  
Elkhart, IN 46516

**From:** [Doug Schirch](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Doug Schirch - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, October 26, 2023 5:34:42 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Doug Schirch  
1019 S 7th St  
Goshen, IN 46526

**From:** [Dwayne Thomas](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Dwayne Thomas - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, October 26, 2023 4:17:50 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Dwayne Thomas  
3040 W Ridge Rd  
Gary, IN 46408

**From:** [Elizabeth Palacio](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Elizabeth Palacio - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Monday, April 1, 2024 7:54:32 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Elizabeth Palacio  
4124 Wegg Ave  
East Chicago, IN 46312

**From:** [Jacqueline Brunner](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jacqueline Brunner - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Friday, March 8, 2024 10:17:00 AM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Jacqueline Brunner  
1046 W 61st Ave  
Merrillville, IN 46410



**From:** [Jacqueline Hausoul](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jacqueline Hausoul - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, October 26, 2023 6:43:39 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Jacqueline Hausoul  
714 S 18th St  
Chesterton, IN 46304

**From:** [Jake Cseke](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jake Cseke - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, April 3, 2024 6:53:40 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Jake Cseke  
1205 Lincoln St  
Hobart, IN 46342

**From:** [jkeranen72@everyactioncustom.com](mailto:jkeranen72@everyactioncustom.com) on behalf of [James Keranen](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** James Keranen - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Monday, March 4, 2024 4:39:07 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
James Keranen  
634 N Wenger Ave Mishawaka, IN 46544-2426  
[jkeranen72@gmail.com](mailto:jkeranen72@gmail.com)

**From:** [jkeranen72@everyactioncustom.com](mailto:jkeranen72@everyactioncustom.com) on behalf of [James Keranen](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** James Keranen - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Friday, March 22, 2024 9:34:51 AM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$600 million for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
James Keranen  
634 N Wenger Ave Mishawaka, IN 46544-2426  
[jkeranen72@gmail.com](mailto:jkeranen72@gmail.com)

**From:** [James Yoder](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** James Yoder - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Friday, March 8, 2024 10:36:04 AM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
James Yoder  
2360 Redspire Blvd  
Goshen, IN 46526

**From:** [James Yoder](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** James Yoder - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Friday, November 17, 2023 6:47:07 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
James Yoder  
2360 Redspire Blvd  
Goshen, IN 46526

**From:** [Jasmine Glab](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jasmine Glab - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Saturday, November 18, 2023 11:03:31 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Jasmine Glab  
11244 East Dr  
De Motte, IN 46310

**From:** [Jerrol Shaum](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jerrol Shaum - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Saturday, November 18, 2023 12:23:30 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Jerrol Shaum  
1402 Elmherst Ct  
Goshen, IN 46526



**From:** [JERRY Cadwalader](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jerry Cadwalader - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, March 28, 2024 11:40:23 AM

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**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
JERRY Cadwalader  
9746 Georgetowne Dr  
Highland, IN 46322

**From:** [JERRY Cadwalader](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jerry Cadwalader - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Friday, March 8, 2024 9:45:14 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
JERRY Cadwalader  
9746 Georgetowne Dr  
Highland, IN 46322

**From:** [Michael Moore](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Michael Moore - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Friday, October 27, 2023 7:44:58 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Michael Moore  
422 Quail Ct  
Chesterton, IN 46304

**From:** [Michael Wraight](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Michael Wraight - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Wednesday, November 15, 2023 10:55:07 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Michael Wraight  
522 Pennsylvania Ave  
Plymouth, IN 46563

**From:** [Nancy Walter](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Nancy Walter - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Tuesday, December 19, 2023 10:51:49 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Nancy Walter  
1057 Poppyfield Pl  
Schererville, IN 46375

**From:** [Nancy Walter](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Nancy Walter - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, October 26, 2023 11:47:50 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Nancy Walter  
1057 Poppyfield Pl  
Scherville, IN 46375

**From:** [CALEB BAKER](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Caleb Baker - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Tuesday, December 19, 2023 4:55:41 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
CALEB BAKER  
PO Box 381  
Arcadia, IN 46030

**From:** [drhglf@everyactioncustom.com](mailto:drhglf@everyactioncustom.com) on behalf of [Dennis Hahaj](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Dennis Hahaj - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Thursday, February 29, 2024 2:59:35 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Dennis Hahaj  
59220 Lewis St Elkhart, IN 46517-3520  
[drhglf@yahoo.com](mailto:drhglf@yahoo.com)



**From:** [Jan Parr](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jan Parr - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, November 15, 2023 10:25:07 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Jan Parr  
368 E St Clair  
Beverly Shores, IN 46301

**From:** [Jane Bohnsack](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jane Bohnsack - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, November 15, 2023 10:51:23 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Jane Bohnsack  
1152 Cr-325 E  
Valparaiso, IN 46383

**From:** [Jane Krause](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jane Krause - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Saturday, March 30, 2024 6:59:15 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Jane Krause  
2200 W 3rd St  
Hobart, IN 46342

**From:** [Janice Katz](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Janice Katz - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, November 30, 2023 12:47:00 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Janice Katz  
PO Box 673  
Beverly Shores, IN 46301

**From:** [lettersat@everyactioncustom.com](mailto:lettersat@everyactioncustom.com) on behalf of [Diane Miller](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Diane Miller - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, February 28, 2024 7:05:47 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Diane Miller  
51788 Meadow Knoll Dr South Bend, IN 46628-9473  
[lettersat@yahoo.com](mailto:lettersat@yahoo.com)  
(260) 402-8365

**From:** [Dominic Yanke](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Dominic Yanke - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Wednesday, November 29, 2023 12:54:59 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Dominic Yanke  
904 Willow Spring Dr  
Michigan City, IN 46360

**From:** [derichey47@everyactioncustom.com](mailto:derichey47@everyactioncustom.com) on behalf of [Donald Richey](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Donald Richey - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Tuesday, April 2, 2024 5:41:15 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$600 million for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Donald Richey  
1145 S 500 E Columbia City, IN 46725-9049  
[derichey47@gmail.com](mailto:derichey47@gmail.com)  
(260) 229-0995

**From:** [Nora McDonald](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Nora McDonald - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Monday, April 1, 2024 6:15:24 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Nora McDonald  
228 E 10th St  
Michigan City, IN 46360



**From:** [Richard Dvorscak](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Richard Dvorscak - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, November 16, 2023 8:39:06 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Richard Dvorscak  
1556 Maine Ave  
Michigan City, IN 46360

**From:** [Richard Gratt](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Richard Gratt - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, October 26, 2023 4:30:04 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Richard Gratt  
314 N Dwiggins Ave  
Griffith, IN 46319

**From:** [Robert Castagna](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Robert Castagna - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, November 15, 2023 4:17:11 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Robert Castagna  
11751 Homestead Heights Dr  
Saint John, IN 46373

**From:** [Robert Ward](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Robert Ward - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, November 21, 2023 9:02:07 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Robert Ward  
510 Shamrock Ln  
Valparaiso, IN 46385

**From:** [Robert Yoder](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Robert Yoder - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Friday, March 8, 2024 9:38:23 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Robert Yoder  
1419 Hampton Cir  
Goshen, IN 46526

**From:** [Sachel Sutton](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Sachel Sutton - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Wednesday, April 3, 2024 12:07:09 AM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Sachel Sutton  
3129 E 695 N  
Howe, IN 46746

**From:** [Sam Yoder](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Sam Yoder - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Wednesday, March 13, 2024 1:24:14 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Sam Yoder  
18050 County Road 112  
Bristol, IN 46507

**From:** [Seth Acheson](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Seth Acheson - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, March 21, 2024 6:52:18 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Seth Acheson  
2156 Pokeberry Ct  
Valparaiso, IN 46385



**From:** [Jerrol Shaum](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Jerry Shaum - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Saturday, December 16, 2023 3:40:11 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Jerrol Shaum  
1402 Elmherst Ct  
Goshen, IN 46526

**From:** [Cecil Yoder](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Cecil Yoder - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, October 26, 2023 4:43:43 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Cecil Yoder  
207 W Berry St  
Middlebury, IN 46540

**From:** [Cheryl Chapman](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Cheryl Chapman - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Saturday, December 2, 2023 6:13:37 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947! Here in Michigan City, IN, some of our major churches nearly "went out of business" because their bills were so high. Hard times aren't over yet, and even though the utility is making profits, churches aren't!!! No rate increase, please! Whoever thought up this rate increase has no idea how real people live.

Thank you,  
Cheryl Chapman  
2923 Summit Dr  
Michigan City, IN 46360

**From:** [Cheryl Chapman](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Cheryl Chapman - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Monday, April 1, 2024 6:37:48 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Cheryl Chapman  
2923 Summit Dr  
Michigan City, IN 46360

**From:** [Cheryle Grassano](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Cheryle Grassano - No more increases Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Sunday, November 19, 2023 9:10:08 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Cheryle Grassano  
2611 White Oak Ave  
Whiting, IN 46394

**From:** [Nicholas King](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Nicholas King - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, November 21, 2023 5:45:06 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

And having ended net metering for EDG which in effect has almost totally shut down the opportunity for us to produce our own solar power as well as share with the neighbors, we have become even more victims of a monopoly. Although we pay the utilities millions of dollars to pay lawyers and lobbyists to work against us, we ask for your justice in doing what is right for the people of IN as well as the world. You know how it would go if solar were put to a popular referendum, so we ask you to work for the people too and not just for the well funded monopolies.

Thanks for your efforts to do the right thing.

Regards,  
Nicholas King  
1705 Longwood Ct  
Goshen, IN 46526

**From:** [Christine Colon](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Christine Colon - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Wednesday, March 13, 2024 12:34:06 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Christine Colon  
4024 E 14th Pl  
Gary, IN 46403

**From:** [Colleen Miltenberger](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Colleen Miltenberger - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, March 14, 2024 7:14:36 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Colleen Miltenberger  
5566 W 300 N  
La Porte, IN 46350



**From:** [Dave Carlson](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Dave Carlson - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Monday, March 11, 2024 8:24:58 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Dave Carlson  
231 68th Pl  
Schererville, IN 46375

**From:** [fosterjm58@everyactioncustom.com](mailto:fosterjm58@everyactioncustom.com) on behalf of [Joan Foster](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Joan Foster - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Tuesday, February 27, 2024 1:33:32 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

Please make them stay to their word. Destroying our planet isn't great for anyone!

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Joan Foster  
467 Elm St Wabash, IN 46992-2857  
[fosterjm58@yahoo.com](mailto:fosterjm58@yahoo.com)  
(260) 563-2718

**From:** [Kayla Allen](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Kayla Allen - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, November 16, 2023 10:27:49 AM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Kayla Allen  
10355 Price St  
Crown Point, IN 46307

**From:** [Kayla Allen](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Kayla Allen - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, March 12, 2024 11:09:57 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Kayla Allen  
10355 Price St  
Crown Point, IN 46307

**From:** [Kerry Kieper](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Kerry Kieper - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Tuesday, March 12, 2024 8:14:05 AM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Kerry Kieper  
239 Krouser Dr  
Valparaiso, IN 46385

**From:** [Kevin Lansdowne](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Kevin Lansdowne - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, November 16, 2023 1:46:27 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

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CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Kevin Lansdowne  
201 Lion St  
Wanatah, IN 46390

**From:** [kristine kysel](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** kristine kysel - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, November 29, 2023 12:28:45 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
kristine kysel  
1607 N 500 E  
Michigan City, IN 46360

**From:** [Laura Pepin](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Laura Pepin - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, March 13, 2024 1:49:47 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Laura Pepin  
3520 171st Pl  
Hammond, IN 46323



**From:** [Laura Toops](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Laura Toops - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Wednesday, March 13, 2024 11:38:15 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

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CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Laura Toops  
5565 E 73rd Ave  
Merrillville, IN 46410

**From:** [Patricia Heepe](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Patricia Heepe - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, December 14, 2023 8:02:12 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

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Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Patricia Heepe  
5145 Esteb Rd  
Richmond, IN 47374

**From:** [paul wehner](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** paul wehner - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Wednesday, November 22, 2023 6:48:02 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
paul wehner  
1535 Hass Dr  
South Bend, IN 46635

**From:** [Mary Cahill](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Mary Cahill - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Wednesday, March 13, 2024 9:10:36 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

We know that building such an "additional facility" allows them to raise prices by some by-law, but, why not just tell customers to hand their wallets over to Nipsco - that's basically what you ARE DOING with these unnecessary price increases.

Respectfully,  
Mary Cahill  
6362 Maryland Ave  
Hammond, IN 46323

**From:** [Melvin Hettrick](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Melvin Hettrick - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, March 14, 2024 2:55:55 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Melvin Hettrick  
8 Indian Camp Trail  
Ogden Dunes, IN 46368

**From:** [Pam Claeys](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Pam Claeys - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Friday, March 29, 2024 9:10:36 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Pam Claeys  
1106 Bellevue Ave  
South Bend, IN 46615

**From:** [Patricia Hansen](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Patricia Hansen - Please oppose NIPSCO Gas's request to jack up our gas bills yet again  
**Date:** Tuesday, February 27, 2024 7:32:28 PM

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Dear Counselor Fine,

With Cause Number 45967, NIPSCO wants another \$8 from customers each and every month. The monopoly has already received approval for a slew of rate hikes over the past few years: \$949 million in July 2020, \$76 million in December 2021, and \$71.8 million in July 2022. NIPSCO has more money than God, they have always had the power to rip off the public, the most expensive power company in the US.

Making matters worse, NIPSCO also wants to raise our fixed charge again. I can't say I'm surprised, because it seems like every base rate case includes a request to raise this flat monthly fee. I am irritated by NIPSCO's greed in asking for such a high fixed charge of \$25.50. When is enough enough?

We don't just pay our utility bills each and every month, we also have to pay for housing, food, and healthcare. With rising costs across the board, it's getting harder and harder to afford our gas bills. I am really worried for the people in my community who may have to choose whether to heat their homes or eat. That's not a decision anyone should ever have to make.

Please do everything you can to stand up for NIPSCO gas customers in Cause Number 45967. Please say NO, ABSOLUTELY NOT! to their greedy request for higher rates and a significant increase in the fixed monthly charge. How are we suppose to be living here with this continuing highway robbery.

Thank you,  
Patricia Hansen  
602 D St  
La Porte, IN 46350

**From:** [Paul Yoder](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Paul Yoder - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, October 26, 2023 6:39:28 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Paul Yoder  
1824 Woodgate Dr  
Goshen, IN 46526



**From:** [Sterling Sears](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Sterling Sears - Opposition to proposed NIPSCO rate hike to pay for gas plant  
**Date:** Saturday, March 30, 2024 1:18:10 AM

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Dear Utility Consumer Counselor Bill Fine,

NIPSCO bills have already climbed in the 18 months I have lived in their service area. We need to stop rampant overreach by monopolies that hold their consumers captive and I would urge the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

Consumers cannot afford the ever-increasing NIPSCO rate hikes. Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Sterling Sears  
443 Roxbury Rd  
Valparaiso, IN 46385

**From:** [Steven keilman](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Steven Keilman - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, April 2, 2024 9:43:02 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Steven keilman  
5596 Danube Ave  
Portage, IN 46368

**From:** [Terry gordon](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Terry gordon - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, October 26, 2023 4:14:10 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Terry gordon  
712 205th Pl  
Dyer, IN 46311

**From:** [Warren Ransom](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Warren Ransom - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Monday, March 11, 2024 10:52:59 AM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

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CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Warren Ransom  
1926 Michigan Ave  
La Porte, IN 46350

**From:** [Willette Marberry](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Willette Marberry - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, October 26, 2023 4:18:21 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Willette Marberry  
4128 Buchanan St  
Gary, IN 46408

**From:** [williamcrhodes2@gmail.com@mq.gospringboard.io](mailto:williamcrhodes2@gmail.com@mq.gospringboard.io) on behalf of [William Rhodes](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** William Rhodes - Please Stand with Customers on Cause No. 45967  
**Date:** Sunday, February 25, 2024 3:42:17 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Commissioners,

I'm writing today to urge the IURC to help protect residential customers from already too-high rates and closely scrutinize the recent rate proposal from NIPSCO Gas in Cause No. 45967.

Of particular concern is the increase to the customer charge. A \$9 a month increase in this fee, before even turning on the furnace or the stove, punishes older Hoosiers even if they use less natural gas.

Whether it's the increased costs of food or prescriptions, too many of us are struggling to keep up and increasing our gas bill makes it even more difficult.

Please listen to customers like me and push back against this request.

Thank you,

William Rhodes

**From:** [Debora Yount](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Debora Yount - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, December 14, 2023 6:12:52 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

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Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Debora Yount  
2225 Cragmont St  
Madison, IN 47250

**From:** [Wicker12612@everyactioncustom.com](mailto:Wicker12612@everyactioncustom.com) on behalf of [HELEN HERNANDEZ](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Helen Hernandez - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Thursday, March 21, 2024 2:43:39 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$600 million for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
HELEN HERNANDEZ  
13340 S Main St Young America, IN 46998-3104  
[Wicker12612@gmail.com](mailto:Wicker12612@gmail.com)  
(574) 699-6579



**From:** [Holly Welch](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Holly Welch - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Tuesday, December 19, 2023 2:09:01 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Holly Welch  
5158 Broadway St  
Indianapolis, IN 46205

**From:** [Janet Ault](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Janet Ault - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Tuesday, December 19, 2023 7:31:48 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Janet Ault  
4185 Gran Haven Dr  
Bloomington, IN 47401

**From:** [Junius Pressey](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Junius Pressey - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Saturday, November 4, 2023 3:51:41 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Junius Pressey  
6005 Sawmill Woods Dr  
Fort Wayne, IN 46835

**From:** [kemery@everyactioncustom.com](mailto:kemery@everyactioncustom.com) on behalf of [Keith Emery](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Keith Emery - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, April 3, 2024 5:37:55 PM

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. NIPSCO own witness, Kevin Blissmer, testifies that over the 30-year life of the gas plant, the total financing cost of the project is estimated to exceed \$1.6 BILLION. Despite less expensive alternatives being available, the Company still wants to saddle customers with this extreme cost for an occasionally used fossil fuel plant. Moreover, NIPSCO promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$1.6 BILLION for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Sincerely,  
Keith Emery  
1101 N Leland Ave Indianapolis, IN 46219-2949  
[kemery@surf-ici.com](mailto:kemery@surf-ici.com)  
(317) 357-4152

**From:** [kemery@everyactioncustom.com](mailto:kemery@everyactioncustom.com) on behalf of [Keith Emery](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Keith Emery - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Thursday, February 8, 2024 9:13:51 AM

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Keith Emery  
1101 N Leland Ave Indianapolis, IN 46219-2949  
[kemery@surf-ici.com](mailto:kemery@surf-ici.com)  
(317) 357-4152

**From:** [blakeli@everyactioncustom.com](mailto:blakeli@everyactioncustom.com) on behalf of [Lincoln Blake](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Lincoln Blake - InPlease reject NIPSCO's proposal in cause number 45947  
**Date:** Thursday, March 21, 2024 3:18:13 PM

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$600 million for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Lincoln Blake  
2030 Chester Blvd Richmond, IN 47374-1215  
[blakeli@earlham.edu](mailto:blakeli@earlham.edu)  
(765) 960-8418

**From:** [Macie Weir](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Macie Weir - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Saturday, October 21, 2023 12:18:22 PM

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Macie Weir  
1239 S 7th St  
Terre Haute, IN 47802

**From:** [amenoartemis@everyactioncustom.com](mailto:amenoartemis@everyactioncustom.com) on behalf of [AJ Cho](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** AJ Cho - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, April 3, 2024 12:13:08 AM

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$600 million for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
AJ Cho  
159 Santa Teresa San Leandro, CA 94579-1963  
[amenoartemis@gmail.com](mailto:amenoartemis@gmail.com)  
(510) 213-8231



**From:** [Brandy Cunningham](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Brandy Cunningham - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, February 13, 2024 3:52:34 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Brandy Cunningham  
3307 N Pennsylvania St  
Indianapolis, IN 46205

**From:** [debmoore2017@everyactioncustom.com](mailto:debmoore2017@everyactioncustom.com) on behalf of [Deborah Moore](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Deborah Moore - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Thursday, March 21, 2024 10:58:39 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$600 million for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Deborah Moore  
3723 Parkview Way Jeffersonville, IN 47130-6904  
[debmoore2017@gmail.com](mailto:debmoore2017@gmail.com)

**From:** [lizskelton66@everyactioncustom.com](mailto:lizskelton66@everyactioncustom.com) on behalf of [Elizabeth Skelton](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Elizabeth Skelton - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, February 7, 2024 4:14:39 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Elizabeth Skelton  
1111 Pearl St New Albany, IN 47150-4759  
[lizskelton66@gmail.com](mailto:lizskelton66@gmail.com)  
(812) 952-9339

**From:** [Bruce Weaver](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Bruce Weaver - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, December 14, 2023 1:16:37 PM

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Dear Counselor Fine,

Guys - come on!!! NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Bruce Weaver  
7651 Micawber Ct  
Indianapolis, IN 46256

**From:** [Bryce Gustafson](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Bryce Gustafson - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Wednesday, November 29, 2023 11:05:44 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Bryce Gustafson  
321 S Temple Ave  
Indianapolis, IN 46201

**From:** [Noell Fields](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Noell Fields - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Tuesday, December 19, 2023 5:22:23 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Noell Fields  
7915 Alexander St  
Indianapolis, IN 46259

**From:** [Clinton Alexander](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Clinton Alexander - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Tuesday, December 19, 2023 9:56:18 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Clinton Alexander  
5733 E 75th St  
Indianapolis, IN 46250

**From:** [Noell Fields](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Noell Fields - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Tuesday, December 19, 2023 5:22:24 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again this year in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Noell Fields  
7915 Alexander St  
Indianapolis, IN 46259



**From:** [patriciafleetwood@everyactioncustom.com](mailto:patriciafleetwood@everyactioncustom.com) on behalf of [Patricia Fleetwood](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Patricia Fleetwood - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, February 28, 2024 9:35:33 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Patricia Fleetwood  
5203 T C Steele Rd Nashville, IN 47448-9785  
[patriciafleetwood@yahoo.com](mailto:patriciafleetwood@yahoo.com)

**From:** [Cynthia Clark](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Cynthia Clark - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Tuesday, November 28, 2023 6:19:38 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Cynthia Clark  
2203 Broadway St  
Indianapolis, IN 46205

**From:** [debmoore2017@everyactioncustom.com](mailto:debmoore2017@everyactioncustom.com) on behalf of [Deborah Moore](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Deborah Moore - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, April 3, 2024 7:45:47 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. NIPSCO own witness, Kevin Blissmer, testifies that over the 30-year life of the gas plant, the total financing cost of the project is estimated to exceed \$1.6 BILLION. Despite less expensive alternatives being available, the Company still wants to saddle customers with this extreme cost for an occasionally used fossil fuel plant. Moreover, NIPSCO promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers. Instead, the Commission should require NIPSCO to use more renewable energy and batteries and offer other ways for customers to help NIPSCO manage its system. It is not reasonable to expect customers to pay more than \$1.6 BILLION for a new gas plant when less expensive alternatives exist.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Sincerely,  
Deborah Moore  
3723 Parkview Way Jeffersonville, IN 47130-6904  
[debmoore2017@gmail.com](mailto:debmoore2017@gmail.com)

**From:** [Sandra Lowe](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Sandra Lowe - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Tuesday, November 28, 2023 9:35:52 AM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want us to pay another \$641 million to build a gas plant that will only run 20% of the year.

We cannot keep up with all of these hikes in our bills! I'm very concerned about how much NIPSCO customers like me will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. We can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike our bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Sandra Lowe  
8202 Eaton Ct  
Indianapolis, IN 46239

**From:** [debmoore2017@everyactioncustom.com](mailto:debmoore2017@everyactioncustom.com) on behalf of [Deborah Moore](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Deborah Moore - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, February 28, 2024 2:45:51 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Deborah Moore  
3723 Parkview Way Jeffersonville, IN 47130-6904  
[debmoore2017@gmail.com](mailto:debmoore2017@gmail.com)

**From:** [cshriner@everyactioncustom.com](mailto:cshriner@everyactioncustom.com) on behalf of [Charles Shriner](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Charles Shriner - Please reject NIPSCO's proposal in cause number 45947  
**Date:** Wednesday, February 28, 2024 2:26:51 PM

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Dear Indiana Utility Regulatory Commission,

I am writing about NIPSCO's proposal for a new gas plant. Please reject this proposal. They promised in a 2018 plan that they would lean more on clean energy, and gas is not clean energy! They are breaking their promise to NIPSCO customers and all Hoosiers.

This email is related to cause number 45947, and my personal info is attached. While I found out about this through an organization (Counterspark), I am sending this email because I care about this topic.

Thank you!

Sincerely,  
Charles Shriner  
5623 E Washington St Apt 7 Indianapolis, IN 46219-6459  
[cshriner@mac.com](mailto:cshriner@mac.com)  
(317) 926-0773

**From:** [Sara Watson](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Sara Watson - We need affordable NIPSCO bills, not an expensive gas plant!  
**Date:** Thursday, March 28, 2024 2:09:09 PM

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Dear Utility Consumer Counselor Bill Fine,

As NIPSCO customers, we have seen our bills climb 36% in the last decade, and they just hiked our bills again in August 2023. Now they're already working to raise our bills even more! We need you to stand up for us by urging the IURC to reject the gas plant that NIPSCO wants to build in Cause Number 45947.

NIPSCO wants us to pay ANOTHER \$641 million of our hard earned money to build a gas plant that will only run a fraction of the year?! We can't afford that.

To add insult to injury, NIPSCO has said that construction costs for this plant could end up being up to 30% more than the \$642 million estimate. And of course since they want to use the CWIP tracker to pass those costs directly on to us, there's no real incentive for them to keep those construction costs under control.

CWIP shifts all of the construction risks away from NIPSCO and their shareholders and onto the backs of customers. This feels especially dangerous considering that NIPSCO wants to contract out aspects of the plant to different contractors, with NIPSCO managing the overall process. Since they've never done this before for a gas plant, there's a good chance that this will lead to even more unnecessary costs heaped onto the backs of captive customers like me.

Enough is more than enough when it comes to ever-increasing NIPSCO bills! Please stand up for affordable utility bills by rejecting NIPSCO's request in Cause Number 45947.

Regards,  
Sara Watson  
7849 Wisteria Ln  
Evansville, IN 47720

**From:** [Ronald Drahos](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Ronald Drahos - Reject NIPSCO's request for a dirty & expensive gas plant  
**Date:** Thursday, March 14, 2024 1:52:57 PM

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Dear Counselor Fine,

NIPSCO just got an electric rate hike in August 2023. Now they want people to pay another \$641 million to build a gas plant that will only run 20% of the year.

There is no good reason to keep up with all of these hikes in our energy bills! I'm very concerned about how much NIPSCO customers will end up paying for this gas plant because of the Construction Work in Progress tracker. CWIP makes it so utilities like NIPSCO have no real incentive to keep construction costs low because they know they can just pass the costs onto us.

NIPSCO has already said that the \$641 million price tag is only an estimate, and that costs for the plant could increase by up to 30%. People can't afford to be treated like cash cows for an expensive project that's going to sit idle most of the year, especially when we should be tapping cleaner and cheaper options like renewables and efficiency!

Please REJECT NIPSCO's request to hike people's bills for a dirty gas plant in Cause Number 45947.

Please SUPPORT cheaper, cleaner options like battery storage and demand response that would help NIPSCO meet peak demand at a lower cost.

Respectfully,  
Ronald Drahos  
3805 S Woods Edge Bend  
Bloomington, IN 47401



**From:** [Susan Peterson](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Susan Peterson - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Wednesday, December 20, 2023 2:32:38 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

Thank you,  
Susan Peterson  
5621 N Pennsylvania St  
Indianapolis, IN 46220

**From:** [Tom Probasco](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Tom Probasco - Please stand up for cheaper, cleaner options in Cause No 45947!  
**Date:** Thursday, March 28, 2024 12:11:48 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Dear Counselor Fine,

NIPSCO already got approval to raise our bills by over \$12 per month in 2023. Now they want us to pay another \$641 million to build a gas plant that will barely run.

NIPSCO doesn't need to build an expensive, polluting gas plant to meet peak demand! Battery storage and demand response can meet peak demand in a way that's cleaner and more affordable for us as customers.

We all know this huge gas plant could end up costing a whole lot more when it's all said and done. Now that the Indiana General Assembly gave utilities Construction Work in Progress for gas plants, NIPSCO can pass construction costs onto customers like me before the plant even produces any electricity, which means they have no incentive to keep costs down.

Please stand up for NIPSCO customers like me by supporting cleaner and more affordable options to meet peak demand, like battery storage and demand response.

We need you to reject NIPSCO's request for an expensive and unnecessary gas plant in Cause Number 45947!

While we don't live in the NIPSCO service area, it still affects us, as the use of fossil fuels affects everyone everywhere.

Thank you,  
Tom Probasco  
6163 Haverford Ave  
Indianapolis, IN 46220



April 4, 2024

Consumer Services Staff  
Indiana Office of Utility Consumer Counselor (OUCC)  
115 W. Washington Street, Suite 1500 SOUTH  
Indianapolis, Indiana 46204  
[uccinfo@oucc.in.gov](mailto:uccinfo@oucc.in.gov)

Re: Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant (Case No. 45947)

Advanced Energy United (“United”)<sup>1</sup> appreciates the opportunity to provide comments on Northern Indiana Public Service Company LLC’s (“NIPSCO” or the “Company”) September 12, 2023 petition for a Certificate of Public Convenience and Necessity (“CPCN”) for an approximately 400-megawatt (“MW”) natural gas combustion peaking plant (“Project” or “Peaker”) with the Indiana Utility Regulatory Commission (“Commission”). As it considers NIPSCO’s request, United encourages the Commission to bear in mind the five energy policy pillars laid out by the 21<sup>st</sup> Century Energy Policy Development Task Force. Adherence to the principles of reliability, resilience, stability, affordability, and environmental sustainability<sup>2</sup> obligate the Commission to deny authority to construct the Peaker. Indiana holds significant untapped potential for deploying advanced energy resources that would obviate or reduce any purported need for supplemental fossil fuel-based generation, yet there is no indication that NIPSCO considered the collective implementation of advanced energy resources as an alternative to the proposed Project. Without evaluating such tools and resources as demand-side management and energy storage collectively, NIPSCO has failed to act in its customers’ interests.

The Commission has two paths to rejecting the Peaker. Under the first path, the Commission could consider in the pending docket all options and scenarios for addressing any need for additional capacity during times of grid constraint. Such a comparative evaluation of options will demonstrate that the Project is not in the interest of NIPSCO’s customers and thus warrants rejection. Under the second path, the Commission could reject the petition and direct NIPSCO to incorporate any additional capacity it believes it needs in its upcoming integrated

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<sup>1</sup> Advanced Energy United is a national business association representing leading companies in the advanced energy industry. United supports a broad portfolio of technologies, products, and services that enhance U.S. competitiveness and economic growth through an efficient, high-performing energy system that is clean, secure, and affordable.

<sup>2</sup> Indiana Office of Energy Development. (n.d.). Electricity. <https://www.in.gov/oed/indianas-energy-policy/electricity/>.

resource plan (“IRP”) filing this November 1.<sup>3</sup> Under this approach, NIPSCO can conduct and present a full evaluation of its resources and allow for greater public input before making such a long-term, expensive, and fossil fuel-based investment. While United prefers the more wholistic approach under the second option, under either scenario, it is critical that the Commission direct NIPSCO to evaluate advanced energy alternatives to properly fulfill the ideals of the five pillars and provide the electric service that Hoosiers deserve.

## Comments

### *Project Management*

As a preliminary matter, NIPSCO’s proposal to self-build the Project<sup>4</sup> should cause the Commission to pause. NIPSCO has not previously engaged in self-built gas plant projects, yet now proposes to collect from ratepayers \$1,609,808,326<sup>5</sup> for a project of questionable long-term value. Similarly situated utilities typically utilize a firm for engineering, procurement, and construction (a/k/a “EPC”) when undertaking such projects. The contractual framework in an EPC contract enables the utility to transfer the complete risk of design, procurement, and construction to the contractor. In this situation, however, the Company has chosen to retain the risk without demonstrating experience with projects of this magnitude, cost, and complexity. The Commission should seriously consider the risk to ratepayers stemming from delays and cost overruns before sanctioning an endeavor where the Company could have opted for a less risky path but chose not to. NIPSCO’s proposed delay of the in-service date from 2026 to 2027 had already cost customers an additional \$14.9 million in financing costs.<sup>6</sup>

### *Stranded Asset Risk*

As a peaker plant, the Project is designed as a 400 MW occasionally used generation resource. Due to the rapidly expanding nature of advanced energy technologies, such as, but not limited

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<sup>3</sup> Indiana Utility Regulatory Commission. (n.d.). Integrated Resource Plans. [https://www.in.gov/iurc/energy-division/electricity-industry/integrated-resource-plans/#Northern\\_Indiana\\_Public\\_Service\\_Company\\_\\_NIPSCO\\_](https://www.in.gov/iurc/energy-division/electricity-industry/integrated-resource-plans/#Northern_Indiana_Public_Service_Company__NIPSCO_); Northern Indiana Public Service Company LLC. (2022, March 29). Indianapolis, Indiana, available at [https://www.in.gov/iurc/files/NIPSCO\\_2022-IRP-Extension-Request\\_03292022.pdf](https://www.in.gov/iurc/files/NIPSCO_2022-IRP-Extension-Request_03292022.pdf).

<sup>4</sup> Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of David T. Walter (NIPSCO Exhibit 2), p. 30, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>5</sup> Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Supplemental Testimony of Kevin J. Blissmer (NIPSCO Exhibit 8-S), p. 3, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>6</sup> *Ibid.*, p. 5.



to, solar, wind, energy storage, virtual power plants, and aggregated demand response (“DR”), and the apparent failure to consider such technologies in a comprehensive nature, there is no reason to expect this Peaker to be cost-effective or environmentally sustainable now, let alone in the future. This means that the Project will be a stranded asset sooner rather than later, imposing a burden on NIPSCO’s customers to pay for an inefficient, unnecessary asset. NIPSCO’s shortsightedness is compounded by the influx of the new federal dollars coming to utilities and Indiana under the Inflation Reduction Act. With these dollars, there is no reason that NIPSCO could not find a reliable, less expensive, and more sustainable alternative to the Project.<sup>7</sup>

### *Fossil Fuel Risks*

NIPSCO’s reliance on natural gas exposes its customers to additional cost and reliability risks. While often characterized as a low-cost fuel, natural gas prices can fluctuate significantly. The recent upward trend in monthly average prices have been caused by a variety of factors, including the Russian war in Ukraine, extreme weather events, fuel delivery and availability issues, among others.<sup>8</sup> Exposing customers to volatile natural gas prices is unwarranted and unnecessary given the alternatives available in the form of advanced energy resources. Even with the best attempts to hedge, over the life of such an occasionally used resource, customers will be exposed to unpredictable fuel price fluctuations.<sup>9</sup> Setting aside price fluctuations brought on by extreme weather events, delivery of gas and gas plant operation has been problematic during extreme weather events as well, especially during winter months. Winter Storm Elliot in North Carolina, for example, demonstrated that fossil fuel plants are less reliable than predicted.<sup>10</sup> In contrast, energy storage and renewable energy sources based in Indiana, serviced by Hoosiers, and increasingly made in the United States present an

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<sup>7</sup> For further information and analysis, please see United’s Assessment of Clean Energy Alternative to Natural Gas Resources for the Duke Energy Indiana Combined Cycle Project report from 2023. Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://blog.advancedenergyunited.org/reports/assessment-of-clean-energy-alternatives-to-new-natural-gas-resources>, p. 4-5.

<sup>8</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Part 2 Northern Indiana Public Service Company, Indiana Michigan Power, and CenterPoint Energy Combustion Turbine Projects. (May 2023) *Advanced Energy United*, [https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202\\_Strategenedits%204.13%20final%20draft.pdf](https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202_Strategenedits%204.13%20final%20draft.pdf), p. 30, Figure 20.

<sup>9</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://blog.advancedenergyunited.org/reports/assessment-of-clean-energy-alternatives-to-new-natural-gas-resources>, p. 9.

<sup>10</sup> Sorg, L. (2023, January 4). Several crises and malfunctions at Duke Energy led to rolling blackouts on Christmas Eve, utility officials told state regulators. *NC Newsline*. Retrieved from <https://ncnewsline.com/2023/01/04/several-crises-malfunctions-at-duke-energy-led-to-rolling-blackouts-on-christmas-eve-utility-officials-tell-state-regulators/>.



alternative worth considering. By choosing advanced energy resources, the Company can eliminate many of the risks associated with fossil fuel-powered plants while still fostering economic development and jobs.

### *NIPSCO's Climate Goals*

The Project runs afoul of Indiana's energy pillars and NIPSCO's own goals. NIPSCO's parent company, NiSource, has committed to reaching net zero greenhouse gas emissions by 2040,<sup>11</sup> with NIPSCO specifically committing to reducing emissions by 90% by 2030.<sup>12</sup> Additionally, NiSource's plan calls for "a balanced mix of low- or zero-emission electric generation." Thus, it is hard to see how expanded reliance on natural gas does not jeopardize NIPSCO's and its parent company's overall goals.

### *Hydrogen Red Herring*

The Company notes that the Peaker will be capable of using a blend of hydrogen,<sup>13</sup> but even blended fuels do not completely sever NIPSCO from using fossil fuels to power this Project. NIPSCO witness David Walter testifies that currently, the combustion turbines "being considered are capable of operating on natural gas fuel blended with between 15 and 35% hydrogen."<sup>14</sup> He goes on to mention that the Peaker could possibly burn 100% hydrogen in the future with modifications. At no point, however, does he commit NIPSCO to using hydrogen. Even if hydrogen is eventually used, it would have to be green hydrogen to meet the above-mentioned climate goals. The notion of incorporating green hydrogen, however, suffers at this time from unknown future capital costs, unknown fuel prices, and, significantly, unknown availability.<sup>15</sup>

Should NIPSCO find itself needing to use hydrogen under its own climate goals or other regulations, in the absence of green hydrogen, the Company would likely have to offset its carbon emissions elsewhere, including the use of carbon capture and sequestration ("CCS"). CCS, however, can be costly. For example, CCS is currently estimated to cost approximately

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<sup>11</sup> NiSource. (2022, November 7). *Path to Net Zero Greenhouse Gas Emissions*. News. <https://www.nisource.com/news/article/path-to-net-zero-greenhouse-gas-emissions>.

<sup>12</sup> Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of David T. Walter (NIPSCO Exhibit 2), p. 21, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>13</sup> *Ibid.*

<sup>14</sup> *Ibid.*, p. 29.

<sup>15</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://blog.advancedenergyunited.org/reports/assessment-of-clean-energy-alternatives-to-new-natural-gas-resources>, p. 15.



\$900/kW.<sup>16</sup> These costs do not even consider the expense of storing captured carbon or related enabling infrastructure needed to make CCS a reality.<sup>17</sup>

### *Alternatives that Warrant Consideration in NIPSCO's Forthcoming IRP*

When it denies NIPSCO's petition, the Commission should provide the Company with clear guidance regarding what it expects in any subsequent request for authority to construct new generation. If the Commission directs NIPSCO to reevaluate the Peaker proposal in its 2024 IRP, as is logical, the Company should consider the Peaker in the context of its whole fleet. This is warranted since NIPSCO witness Patrick Augustine acknowledges that there have been significant developments since the Company's last IRP in 2021.<sup>18</sup>

Among the specific directions that the Commission should provide is instruction to consider energy efficiency ("EE") and DR *in conjunction with* additional renewable generation and energy storage. United recognizes that NIPSCO considered EE and DR in preparing its 2021 IRP.<sup>19</sup> When these resources are examined alone, it would not be surprising if EE or DR did not satisfy NIPSCO's projected resource needs. But through expansion of its existing EE and DR programs and creation of new programs, such as allowing third-party DR aggregation, coupled with additional renewable generation and energy storage, the purported need for 400 MW of intermittent gas generation at a cost of over \$1.6 billion may be avoided or reduced.

The Commission should also recognize that programs promoting behind-the-meter generation and storage, third-party developed true community solar, and green tariffs with the flexibility to spur more renewable generation as demand warranted would help address NIPSCO's supply needs and likely at a lower cost to NIPSCO's ratepayers than the projected \$1.6 billion cost for the Peaker. Operating expenses associated with the use of such resources would also likely compare well to fuel costs and operating expenses associated with the Project. Additionally, the Commission should instruct NIPSCO to investigate opportunities under the Inflation Reduction Act, which was enacted after the Company's 2021 IRP.

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<sup>16</sup> Assessment of Clean Energy Alternatives to New Natural Gas Resources: Duke Energy Indiana Combined Cycle Project. (2023, February 14). *Advanced Energy United*. March 18, 2024, <https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Alternatives%20to%20New%20Natural%20Gas%20Resources.pdf> , p. 15-16.

<sup>17</sup> *Ibid.*, p. 17.

<sup>18</sup> Indiana Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of Patrick N. Augustine (NIPSCO Exhibit 7), p. 24, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.

<sup>19</sup> Indiana Utility Regulatory Commission, Petition of Northern Indiana Public Service Company LLC for Certificate of Public Convenience and Necessity to Construct an Approximately 400-Megawatt Natural Gas Combustion Peaking Plant, Case No. 45947, Testimony of Alison M. Becker (NIPSCO Exhibit 1), p. 10-19, available at <https://iurc.portal.in.gov/docketed-case-details/?id=d31fdda7-a051-ee11-be6e-001dd8065be9>.





Another compelling option that the Commission should look at is utility-scale storage options, as they can be designed to be equivalent in capacity and are more economical than combustion turbines (“CT”) in Indiana.<sup>20</sup> The attached United study comparing NIPSCO’s construction of a CT and utility-scale storage found that in all of the planning scenarios, battery storage provided an average net savings of \$3.43 million.<sup>21</sup> Similar savings for ratepayers were seen when looking at Indiana Michigan Power Company (\$66.2 million) and CenterPoint Energy (\$3.5 million).<sup>22</sup> Additionally, since utility-scale storage is future-looking and is useful in a variety of advanced energy solutions, it avoids the stranded asset risk of early retirement of a gas peaker plant and an unnecessary burden on ratepayers.<sup>23</sup> Finally, utility-scale batteries have not only monetary advantages but also negate many of the reliability and fuel risk issues described above. This is because once a battery is installed, its operation and reliability is not affected by external conditions, such as imported fuel constraints<sup>24</sup> or extreme temperatures.<sup>25</sup>

The only way to realize the benefits of these alternatives and opportunities is a global examination of all of NIPSCO’s options. Following such a comprehensive evaluation by NIPSCO and the vetting that occurs in a litigated CPCN proceeding, the Commission can make a better-informed decision about future CPCN requests from the Company. Adopting this course improves the chances that all stakeholders come together to make the best choices for NIPSCO’s ratepayers now and into the future.

## Conclusion

United recognizes the significant work NIPSCO did to prepare the petition. However, as detailed, there are marketplace, cost, and clean energy justifications for denying the petition and directing NIPSCO to take a more comprehensive view of the available means to meet its resource needs. United respectfully urges the Commission to enter an order in this matter consistent with the recommendations contained herein. Doing so will ensure that Indiana’s five energy policy pillars are respected and Hoosier’s interests are protected.

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<sup>20</sup> This is especially true with the numerous federal funding programs. See Assessment of Clean Energy Alternatives to New Natural Gas Resources: Part 2 Northern Indiana Public Service Company, Indiana Michigan Power, and CenterPoint Energy Combustion Turbine Projects. (May 2023) *Advanced Energy United*, [https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202\\_Strategenedits%204.13%20final%20draft.pdf](https://info.aee.net/hubfs/2023%20Reports/Assessment%20of%20Clean%20Energy%20Resources%20Pt.%202_Strategenedits%204.13%20final%20draft.pdf), p. 1.

<sup>21</sup> *Ibid.*, p. 9.

<sup>22</sup> *Ibid.*, p. 1.

<sup>23</sup> *Ibid.*, p. 18.

<sup>24</sup> *Ibid.*, p. 30.

<sup>25</sup> *Ibid.*, p. 17.





Respectfully submitted,

**Michael J. Weiss, Principal**

Advanced Energy United

[mweiss@advancedenergyunited.org](mailto:mweiss@advancedenergyunited.org)



# **Assessment of Clean Energy Alternatives to New Natural Gas Resources: Part 2**

**Northern Indiana Public Service Company,  
Indiana Michigan Power, and CenterPoint  
Energy Combustion Turbine Projects**

Prepared by: Strategen for Advanced Energy United  
May 2023

## Executive Summary

In this report, Strategen assesses the changing policy environment and market dynamics in Indiana and the impact on the economics of investing in battery storage instead of the utility-proposed natural gas-fired combustion turbine (“CT”) plants for three utilities in Indiana. The three utilities, Northern Indiana Public Service Company (“NIPSCO”), Indiana Michigan Power Company (“I&M”), and CenterPoint Energy Indiana (“CenterPoint”), each have proposed building new natural gas CT “peakers” with operations starting in the next five years. Since these plans were announced, the U.S. Federal Government has passed the Inflation Reduction Act of 2022 (“IRA”), which has dramatically reduced the cost of clean energy resources, including battery storage. For NIPSCO and CenterPoint, the Midcontinent Independent System Operator (“MISO”) has also modified their capacity accreditation process, altering the calculation when comparing dispatchable and variable resources. Both of these major changes justify a reassessment of each of the utilities’ plans and the consideration of alternatives to the CTs.

Strategen analyzed battery storage sized to match the capacity provided by each utilities’ proposed gas peaker. An economic analysis was done to estimate the cost of the gas unit relative to the battery storage, including energy and ancillary services revenues.

**The IRA enables significant savings and makes battery storage with equivalent capacity more economic than each utility’s proposed CT. In the year of deployment, battery storage would provide savings of \$3.4 million for NIPSCO, \$66.2 million in savings for I&M, and \$3.5 million in savings for CenterPoint, before taking into account additional factors such as stranded asset risk. Savings in subsequent years are anticipated to be even greater.**

This report reviews the changes from the IRA and MISO capacity accreditation process, then details the case study for each utility, describing the utility’s proposed plans, development of alternative clean energy resources, and the economic analysis. Factors that may further impact the planning decisions are discussed, and the report concludes with recommendations for each utility.



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## New Market Conditions

Utilities in Indiana, including Northern Indiana Public Service Company (NIPSCO), Indiana Michigan Power (I&M), and CenterPoint Energy - Vectren (CenterPoint), have developed resource plans that heavily rely on fossil fuel resources. Each utility has planned coal plant retirement dates ranging from 2023 to 2034, presenting the opportunity to quickly transition Indiana to a dominant clean energy state. Instead, their resource plans include investment in new natural gas units, prolonging the state's dependence on fossil fuels.

Since the plans were released, there have been major changes to the energy industry that will alter the economics of their planning decisions. The recently passed Inflation Reduction Act ("IRA") includes electricity sector policies and incentives that dramatically reduce the cost of many clean energy resources and technologies that assist with the clean energy transition, such as battery storage. The other major change that will impact Indiana is the Midcontinent Independent System Operator ("MISO") seasonal resource adequacy construct, which alters the capacity calculations for any existing asset or resource looking to enter the market.

Recent examples from leading utilities across the U.S. have shown how clean energy portfolios can meet capacity and reliability needs at a lower cost than natural gas: Rocky Mountain Institute ("RMI") identified 11 recent procurements by utilities serving more than six million customers that illustrate how all-source procurements can harness competition to lead to lower-cost and cleaner outcomes for customers while maintaining reliability. Crucially, in these leading examples, only ~10% of procured capacity came from gas plants, while ~90% of new capacity procured was from clean energy resources (wind, solar, storage, energy efficiency, and demand response).<sup>1</sup> However, these Indiana utilities' latest plans propose to build significant new gas-fired generation, largely in the form of combustion turbine ("CT") gas peakers in the next five years.

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<sup>1</sup> L. Shwisberg, M. Dyson, G. Glazer, C. Linvill, M. Anderson, [How to Build Clean Energy Portfolios, A Practical Guide to Next-Generation Procurement Practices](#), March 2021



## Inflation Reduction Act

Passed in August 2022, the IRA provides significant and previously unseen benefits for investments in clean energy technologies. Economic assumptions made by utilities prior to the IRA must be reviewed and updated to include the following benefits:<sup>2</sup>

- △ Extension of clean energy tax credits at their full value for at least ten years, providing economic certainty for investors, developers and utilities.
- △ Technology-neutral tax credits for zero-emission projects, including expansion of the Production Tax Credit (“PTC”) to include solar and expansion of the Investment Tax Credit (“ITC”) to include energy storage.
- △ Clean energy ITC rate up to 30% of the basis of qualified energy property or PTC rate of 100% of the inflation-adjusted credit amount for facilities that pay prevailing wages.
- △ Additional tax credits for projects built in energy communities<sup>3</sup> or low-income communities (+10% of ITC or PTC).
- △ Additional 10% of ITC or PTC credit for projects that meet a domestic content threshold.

According to a recent survey performed by RMI, when full IRA benefits are used (ITC at 50%, PTC at \$31.2/MWh including prevailing wage, domestic content, and energy community bonuses), equivalently sized renewable energy sources are cheaper than 99% of proposed gas plants in the US.<sup>4</sup> Given there is some uncertainty if these utilities would fully take advantage of all IRA benefits, this analysis uses a conservative base assumption of 30% ITC.

## MISO Seasonal Resource Adequacy Accreditation Construct

MISO has put in place changes to their resource adequacy (“RA”) construct to better address increasing emergency events in recent years. Beginning April 2023, MISO will move from annual to seasonal auctions for capacity resources. Planning Reserve

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<sup>2</sup> *Inflation Reduction Act of 2022: Summary Chart*, Troutman Pepper Hamilton Sanders LLP

<https://www.troutman.com/images/content/3/1/319248/IRA-Energy-Impact-Summary-August-2022.pdf>

<sup>3</sup> U.S. Department of the Treasury has issued guidance defining “energy Communities” as communities with closed coal mines or retired coal-fired power plants <https://home.treasury.gov/news/press-releases/jy1269> February 13, 2023

<sup>4</sup> *The Business Case for New Gas Is Shrinking*, Laura Shwisberg, Rocky Mountain Institute <https://rmi.org/business-case-for-new-gas-is-shrinking/> December 8, 2022



Margins and Locational Reliability Requirements will be calculated by MISO for each season in order to address differences in capacity needs across the year.

In addition to the seasonal change, the accreditation of resources will also undergo change. Currently, MISO accredits resources annually based on historic three-year equivalent forced outage rates by asset. Under the new structure, seasonal accreditation will be calculated using a two-tiered weighting structure. The two tiers are “Tier 1,” or “Non-Tight Hours” and “Tier 2,” or “RA Hours”. The RA Hours tier represents hours during the season when operating reserve margin falls below 25%, and this tier will provide higher weighting to resources that can provide capacity during those hours. Over the next three years, MISO will shift to a 20/80 weighting schema for Tier 1 and Tier 2, respectively.

These changes will have a significant impact on the RA valuation of battery storage in MISO. For unit-level accreditation, historical performance during seasonal RA hours will be used to assess capacity value. MISO currently does not have a recommendation for how battery storage capacity should be valued in planning models, but best practice would be to use class-level analysis of Effective Load Carrying Capability (“ELCC”) value by technology in the utility’s system to account for longer-term correlated risks at the portfolio level. See Appendices for each utility’s latest battery storage seasonal capacity values.

Seasonal accreditation based on asset availability during RA hours will also apply to thermal resources going forward. If natural gas or coal plants are not online during RA hours during the previous three years, their capacity accreditation will be lowered. For example, during the recent Winter Storm Elliot in December 2022, the MISO market lost 23,000 MW of natural gas generation (approximately 21% of system peak load) due to unplanned outages. The assets that could not deliver power during this event will see reduced accreditation in future years as a result.



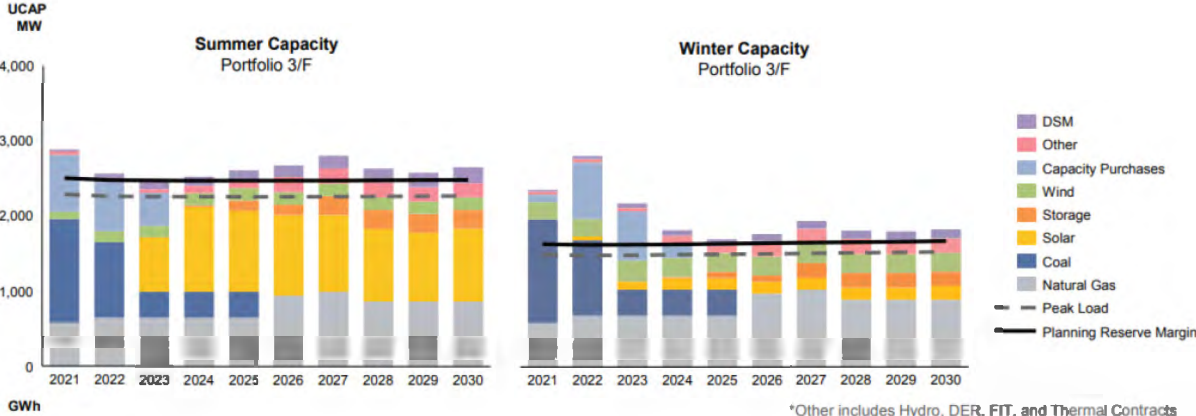
# NIPSCO Peaker Replacement Analysis

## NIPSCO Background

The NIPSCO 2021 Integrated Resource Plan (“IRP”) makes some steps towards decarbonization, but still includes plans to build multiple new gas-fired peakers following the retirement of gas-fired Schahfer Units 16A and 16B between 2025-2028.

The recommended portfolio in NIPSCO’s 2021 IRP includes building up to 300 MW of gas peakers in 2026-28. Of the nine potential portfolios that NIPSCO considered, only three did not include either the construction of new fossil fuel plants or the purchase of firm delivery thermal power purchase agreements (“PPAs”). The preferred portfolio, which included the 300 MW CT, maintains a large fossil fuel capacity fleet, as shown in Figure 1 below.

Figure 1. NIPSCO 2021 IRP proposed capacity mix of preferred portfolio by asset type (Source: NIPSCO 2021 IRP).

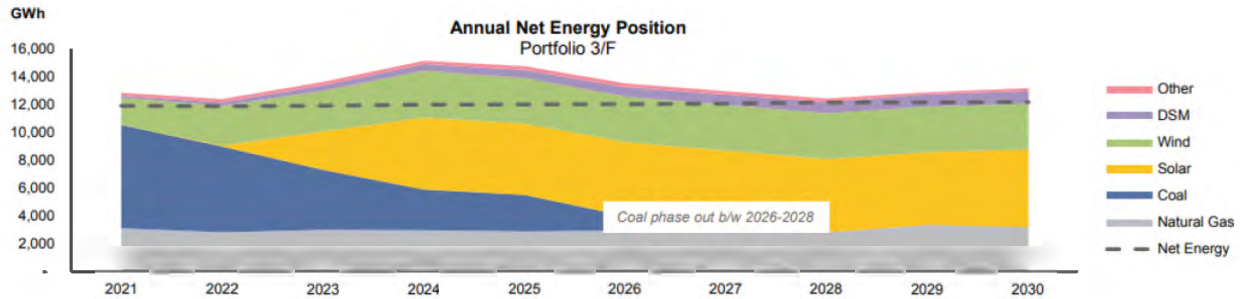


From an energy perspective, NIPSCO does show improvements by retiring their other coal plants by 2026 and not replacing that energy with fossil fuel generation. However, NIPSCO’s analysis shows that the retirement of gas units Schahfer 16A and 16B will not further reduce the amount of fossil fuel-generated energy, as the proposed new gas peakers fill the void and the overall natural gas energy generation remains relatively constant after the coal units are retired, as shown in Figure 2.





Figure 2. NIPSCO 2021 IRP proposed energy mix of preferred portfolio by asset type  
(Source: NIPSCO 2021 IRP).



One other area of attention is how NIPSCO handles regulation ancillary services in their IRP. The IRP states that it does not include regulation revenue in the final net present value revenue requirement calculations due to uncertainty in this particular market. However, this revenue stream was included in the capacity expansion step to develop the preferred portfolio, so it was included as part of the economic calculation in this analysis.

## NIPSCO Economic Analysis: Combustion Turbine vs. Battery Storage

Strategen conducted analysis to evaluate the feasibility and cost of an alternative Clean Energy Portfolio for NIPSCO that included greater investments in battery storage in lieu of the proposed 300 MW natural gas CT additions. This section describes the assumptions used and findings of that analysis.

### **Sizing the Battery Storage**

One of the key reasons cited by NIPSCO for selecting the portfolio with the CT was concern over reliability. As such, any alternative portfolio without the CT should at least meet the equivalent capacity value of the CT for each season under MISO’s new accreditation construct. Based on MISO’s new rules, the battery must be large enough such that it matches the CT in the season with lowest ELCC value. Using the Installed Capacity (“ICAP”) and Unforced Capacity (“UCAP”) values provided in the 2021 NIPSCO IRP,<sup>5</sup> the ELCC and capacity accreditation values are shown in Table 1. A 92.5% firm capacity rating was assumed for the CT for all seasons.

<sup>5</sup> NIPSCO 2021 IRP, Appendix D: ICAP Capacity Mix (MW) by Portfolio – Replacements; UCAP Capacity Mix (MW) by Portfolio - Replacements



**Table 1. Clean Energy Portfolio capacity and energy compared to CT.**

| Installed Capacity   | Battery Storage | Combustion Turbine  |
|--|-----------------|---------------------|
|  |                 | 366 MW 4-hr Storage |
| Effective Load Carrying Capability (ELCC) / Firm Capacity Rating |                 |                     |
| Summer   | 84%             | 92.5%               |
| Winter   | 76%             | 92.5%               |
| Capacity Accreditation (2027)                                    |                 |                     |
| Summer   | 307 MW          | 278 MW              |
| Winter   | 278 MW          | 278 MW              |

### **Net Cost Comparison**

The economics of the battery storage and CT were compared under five scenarios, all adjusted to 2022\$ prices considering historical and expected inflation. These scenarios were chosen to assess the sensitivity of each resource in a wide range of future prices, including both high market power prices and the existence of a carbon price.<sup>6</sup>

1. 2021 Historical Power/Gas Prices + Carbon Price
2. 2021 Historical Power/Gas Prices without Carbon Price
3. 2027 Forward Power/Gas Prices + Carbon Price
4. 2027 Forward Power/Gas Prices without Carbon Price
5. 2021 Historical Power/Gas Prices without Carbon Price, CT capacity factor limited.

In NIPSCO’s 2021 IRP, a carbon price was included as a base assumption. This price was used for Scenarios 1 and 3, while Scenarios 2 and 4 do not include it. In addition, Scenarios 1 and 2 use 2021 power and gas prices adjusted for inflation, while Scenarios 3 and 4 use 2027 power and gas forward prices. On average, 2027 power forwards are higher than 2021 prices, which favors the CT as there are more hours where it is “in the money” to run economically (see Appendix for price details). Finally, Scenario 5 replicates Scenario 2 but limits the CT’s capacity factor to 5% to simulate current day operations of an average CT in Indiana.<sup>7</sup>

<sup>6</sup> For these scenarios, and all other carbon price scenarios performed in this report, the carbon price was included as an adder to the historical or forward power prices to calculate CT dispatch optimization and energy revenue. The analysis did not employ a production cost methodology that endogenously calculated power prices with the inclusion of a carbon price. If power prices reflected the inclusion of the carbon price, the net cost of both assets would be reduced, but the comparison and conclusion are expected to remain the same.

<sup>7</sup> S&P Capital IQ, [Regional Power Plant Outlook](#), 2019 Indiana Natural Gas Turbine Weighted Capacity Factor



Using the input costs and assumptions detailed in the Appendix, the total fixed cost (including annualized CapEx<sup>8</sup> and Fixed O&M) and variable costs were calculated for each price scenario. The assets were assumed to operate economically based on MISO wholesale market price signals. The battery was limited to one charge/discharge cycle per day. The analysis estimates the value of the two alternatives, the CT and the battery storage, by comparing the revenue of all of their energy provision at market price. In the hours when the assets are not generating, discharging, or charging, they can provide ancillary services. The CT is assumed to only provide spinning reserves, while the battery storage is conservatively assumed to be able to provide regulation in 60% of hours, and spinning reserves in the other 40%. Ancillary prices were taken using 2021 historical spinning reserves and regulation prices as reported by MISO and adjusted for inflation, consistent across all scenarios. The total net cost of each asset is calculated by subtracting the total costs from the total gross revenue. The asset with the lower net cost provides the needed capacity at lower cost for the utility and its customers.

Due to the ongoing changes in the MISO capacity accreditation structure, there are not yet reliable seasonal capacity price forecasts to use for this analysis. As such, the net cost calculations do not include capacity revenue. However, since the battery storage is sized such that it has accredited capacity greater than or equal to that of the CT in each season, the battery storage would have at least equal capacity revenue in each scenario. In fact, since the battery summer seasonal capacity accreditation is higher than the CT, there is additional battery revenue that is unaccounted for in this analysis that would show an even greater net benefit for the battery.

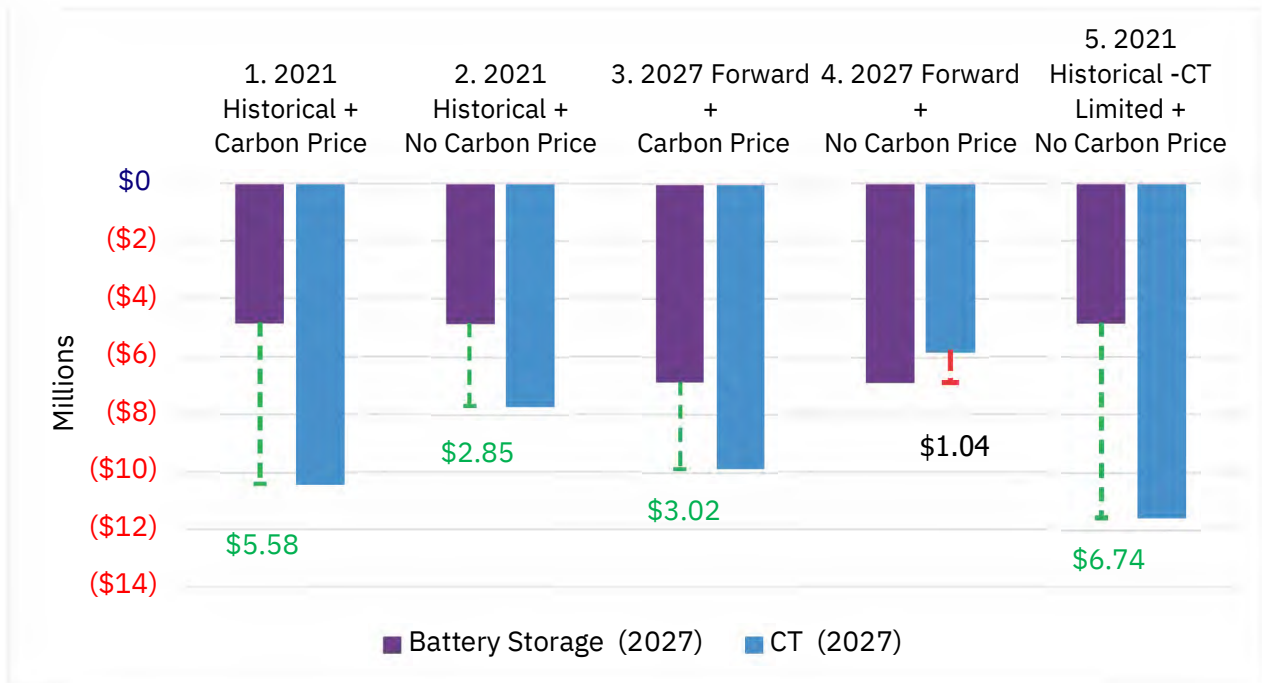
**Across the five scenarios, battery storage provides an average net benefit of \$3.43 million over the CT in 2027.** Summarized results for all scenarios are shown in Figure 3 below.

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<sup>8</sup> CapEx calculated by annualizing NREL ATB 2022.



Figure 3. NIPSCO 2027 net cost\* across five price scenarios, excluding capacity revenue.



Note: Net cost includes annualized capital costs, operational costs, and energy and ancillary revenue. Battery Storage net benefit (Battery net cost less CT net cost) shown in green for each scenario.

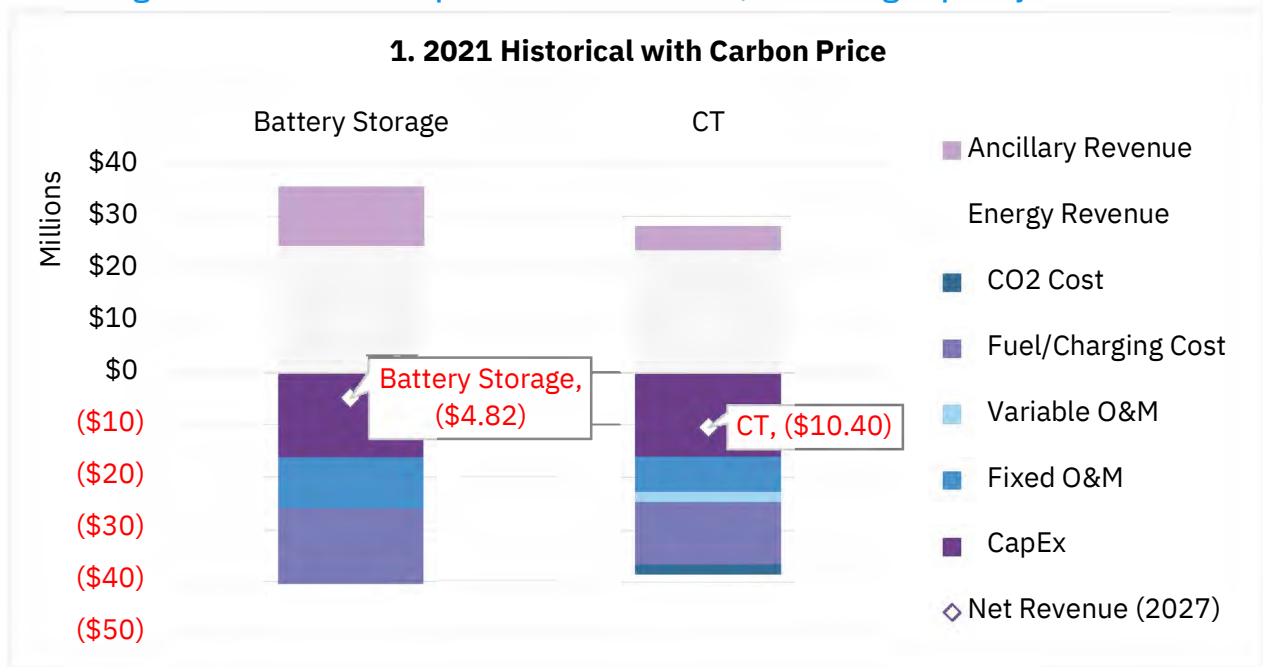
The analysis focuses on a single year, but net savings for the battery system are expected to remain in subsequent years. As variable renewable generation increases in Indiana, the fast charging and discharging capabilities of batteries will provide added value to the system as a flexible asset. This macro-level trend indicates that the economics of battery storage should remain advantageous even beyond the scope of this analysis. The next sections detail the cost breakdown for each of the five scenarios in the first year of operation.

**Scenario 1: 2021 Historical Power/Gas Prices with Carbon Price**

In Scenario 1, 2021 historical gas and power prices were used in addition to the carbon price from NIPSCO’s IRP base scenario. This price scenario resulted in the lowest capacity factor for the CT, generating in only 9% of hours. This resulted in lower energy revenue for the CT compared to other scenarios, and an overall net benefit of \$5.58 million for battery storage in 2027. Figure 4 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.



Figure 4. Net cost comparison in Scenario 1, excluding capacity revenue.



**Scenario 2: 2021 Historical Power/Gas Prices without Carbon Price**

Scenario 2 used the same power and gas prices as Scenario 1 but did not include a carbon price. As a result, the capacity factor of the CT increased to 17%. The increased production provided approximately \$3 million in added revenue for the CT compared to Scenario 1, but the overall economics remained in favor of battery storage with a total net benefit of \$2.85 million in 2027. Figure 5 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

**Scenario 3: 2027 Forward Power/Gas Prices with Carbon Price**

Scenario 3 used 2027 Forward prices for power and gas, plus a carbon price. On average, the forward power prices are significantly higher than the inflation-adjusted 2021 historical prices from the prior scenarios. The CT capacity factor remained relatively high at 15% because of the higher power prices. The result is similar to Scenario 2, with the battery storage seeing a total net benefit of \$3.03 million in 2027. Figure 6 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.



Figure 5. Net cost comparison in Scenario 2, excluding capacity revenue.

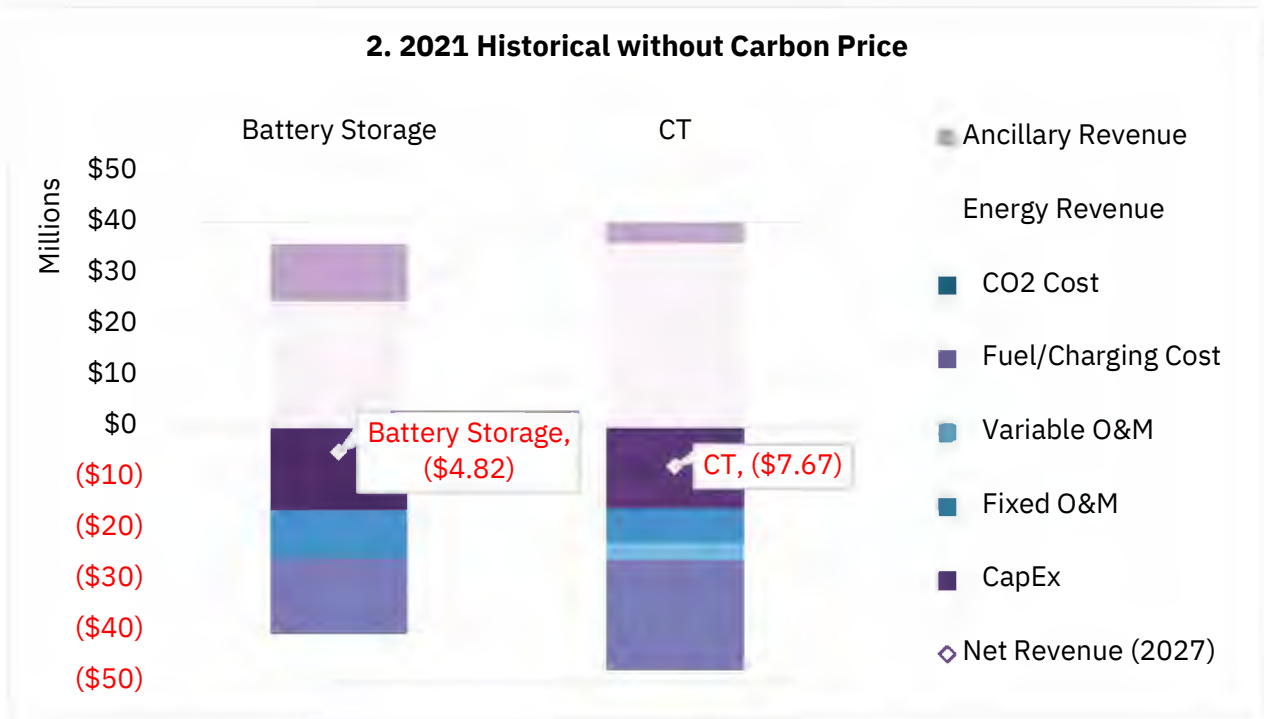
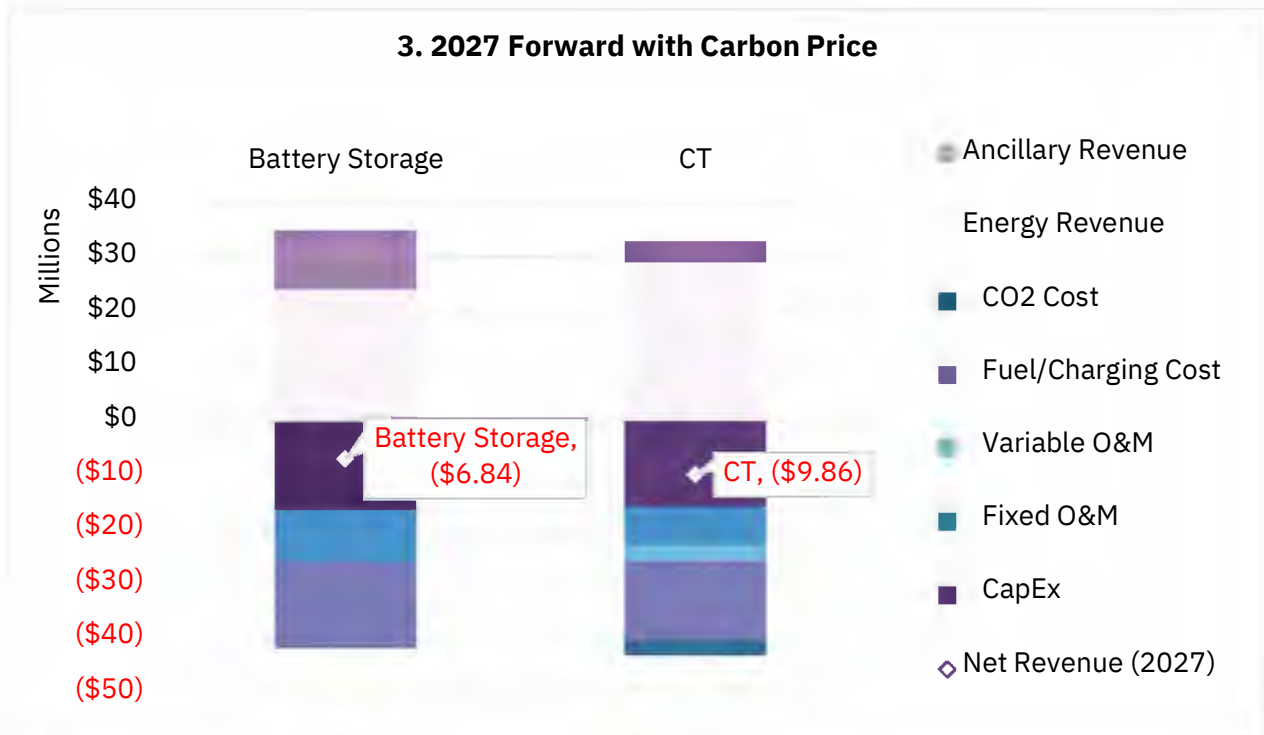


Figure 6. Net cost comparison in Scenario 3, excluding capacity revenue.

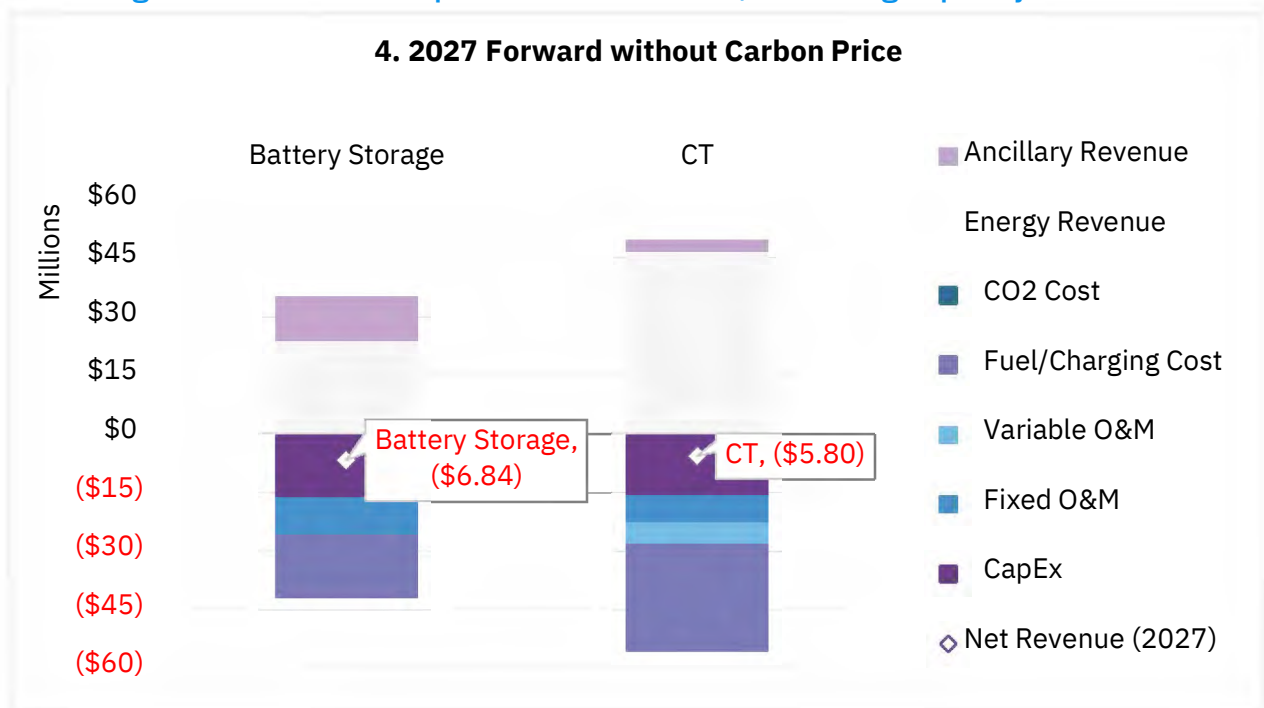


**Scenario 4: 2027 Forward Power/Gas Prices without Carbon Price**

Scenario 4 uses the same power and gas prices as Scenario 3 but did not include a carbon price. This scenario produces the highest capacity factor for the CT at 28%. As a result, the CT generates approximately \$20 million more energy revenue than battery storage. This results in the CT having a total net benefit of \$1.04 million over battery storage in 2027.

While this result makes sense in the context of this limited analysis, it is highly unlikely to occur in a more complete portfolio analysis, where the capacity factor of the CT would likely be far less than 28%, even with higher energy prices. While the forward prices in this scenario provided many hours where the CT was “in the money”, CTs are far less efficient than combined cycle plants that make up the expected base load generation in 2027. As such, their operation pattern would likely remain as a peaker, providing generation during high load hours and when more economic assets were offline. Thus, this sensitivity represents a very unlikely scenario. Figure 7 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

**Figure 7. Net cost comparison in Scenario 4, excluding capacity revenue.**

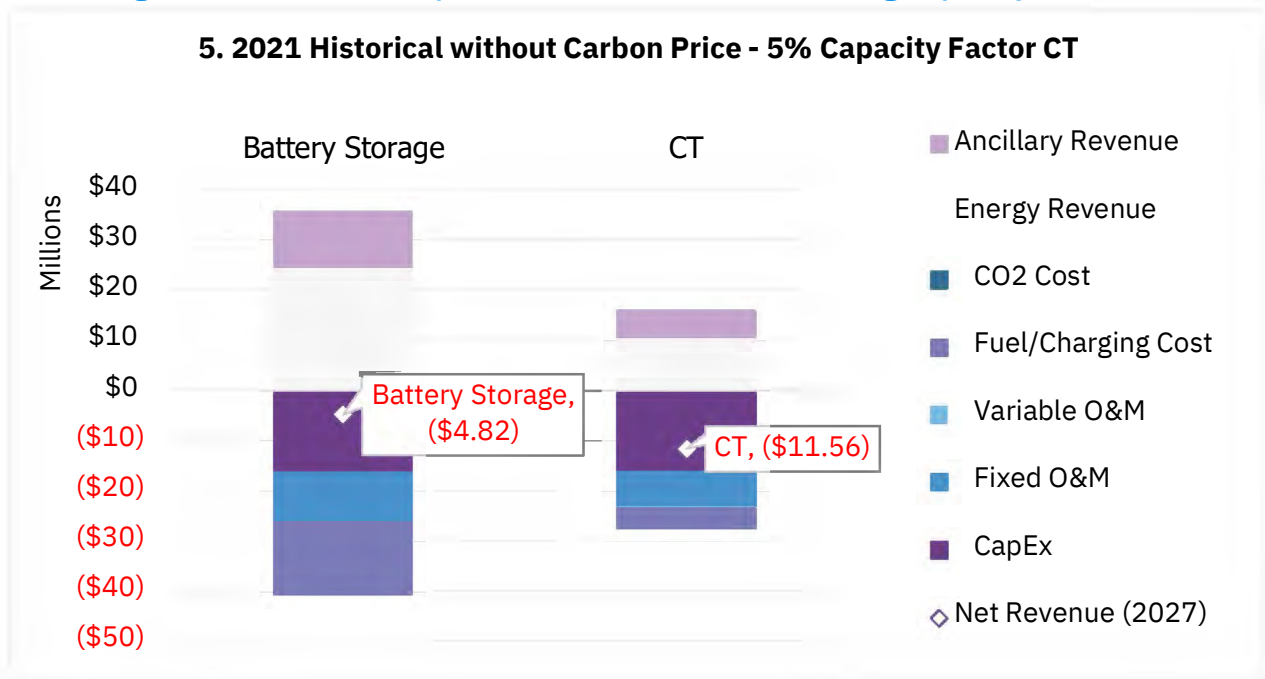




**Scenario 5: 2021 Historical Power/Gas Prices without Carbon Price, CT capacity factor limited**

Scenario 5 replicates the prices of Scenario 2, but dispatch of the CT was limited to a capacity factor of 5% in order to replicate typical operations of CTs in this region. Even if higher power prices persist into the future, this scenario of limited dispatch may still occur. Combined cycle plants will still operate before CTs due to their lower heat rates, and the continuous growth of renewable energy penetration will reduce the frequency of energy shortfall hours that require peaker units to operate. In this scenario, the battery storage has a total net benefit of \$6.74 million compared to the CT. Figure 8 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

**Figure 8. Net cost comparison in Scenario 5, excluding capacity revenue.**



**Total Portfolio Cost Considerations: Assessment of NIPSCO IRP**

In addition to the direct economic comparison between the assets, it is also valuable to assess the overall portfolio impact of replacing the proposed CT with battery storage. While there is not an exact portfolio in NIPSCO’s IRP that matches this scenario, Portfolio H appears to be the closest, as it relies solely on renewables and storage for additional capacity without any new fossil fuel investments.





NIPSCO modeled four potential economic scenarios, as shown in Table 2. These scenarios varied the gas and carbon prices, federal technology incentives, load growth, and ELCC of solar.

**Table 2. Description of IRP economic scenarios (Source: NIPSCO 2021 IRP).**

| Scenario Name                       | Gas Price | CO <sub>2</sub> Price | Federal Tech. Incentives   | Load Growth   | Solar Capacity (ELCC) Credit (Current → 2040) |
|-------------------------------------|-----------|-----------------------|--|---------------|---|
| Reference Case                      | Base      | Base                  | 2-year ITC extension (solar); 1-year PTC extension (60%)   | Base          | 50% → 25%                                     |
| Status Quo Extended                 | Low       | None                  | No change to current policy  | Lower         | 50% → 30%                                     |
| Aggressive Environmental Regulation | High      | High                  | 5-year ITC extension (solar) plus expansion to storage; 3-year PTC extension (60%)   | Close to Base | 50% → 15%                                     |
| Economy-Wide Decarbonization        | Base      | None                  | 10-year ITC extension (solar) plus expansion to storage; 10-year PTC extension (60%); tracking further potential federal support for advanced tech including hydrogen and NG CCS | Higher        | 50% → 15%                                     |

In NIPSCO’s “Reference Case”, which was the basis for the original IRP analysis and recommendation, Portfolio H was the most expensive option, and thus was removed from consideration. However, since the 2021 IRP was published, the IRA was passed and now the fourth scenario, “Economy-Wide Decarbonization”, could be considered the new reference due to the similarities between the Federal Tech Incentives outlined in Table 2 and the current IRA provisions. Under this scenario, Portfolio H is now the fourth cheapest option, and even has a lower cost than the preferred portfolio, Portfolio F. Thus, while not perfectly analogous, the fact that Portfolio H is favorable under the Economy-Wide Decarbonization scenario is consistent with our finding that the Clean Energy Portfolio we modeled is favorable under the IRA. All scenarios and portfolio costs are shown in Table 3.



**Table 3. IRP Replacement portfolio cost in each economic scenario (30-year NPVRR – millions of \$) (Source: NIPSCO 2021 IRP).**

| Replacement Portfolio | Reference Case | Status Quo Extended | Aggressive Environmental Regulation | Economy-Wide Decarbonization |
|-----------------------|----------------|---------------------|-------------------------------------|------------------------------|
| A                     | 11,661         | 11,661              | 11,661                              | 11,661                       |
| B                     | 11,661         | 11,661              | 11,661                              | 11,661                       |
| C                     | 10,312         | 9,309               | 11,637                              | 12,518                       |
| D                     | 10,438         | 9,644               | 11,338                              | 11,965                       |
| E                     | 10,467         | 9,588               | 11,373                              | 12,126                       |
| F                     | 10,426         | 9,495               | 11,489                              | 12,243                       |
| G                     | 11,042         | 10,485              | 11,573                              | 11,809                       |
| H                     | 11,090         | 10,458              | 11,482                              | 12,011                       |
| I                     | 10,792         | 9,933               | 11,550                              | 11,848                       |

The tax credits provided in the IRA significantly improve the economics not just of the battery storage itself, but of the entire clean energy portfolio under consideration by NIPSCO. While there are other differences between the four scenarios that result in generally higher costs across the board for all the portfolios in the “Economy-Wide Decarbonization” Scenario (such as higher assumed load growth), this does not diminish this key conclusion that the passage of the IRA fundamentally improves the relative attractiveness of clean portfolios to those that continue to add fossil fuels.

## NIPSCO Additional Considerations

### **Fuel Price Volatility Risk**

NIPSCO’s IRP does not outline specific gas hedge risk policies, however they do indicate that at least a portion of their gas supply is hedged with the purchase of monthly NYMEX Henry Hub natural gas contracts. Without knowing how far into the future they hedge, or what percentage of total volume is hedged, it is difficult to comment on the effectiveness of their risk hedging strategy.

Despite this lack of visibility, it is likely that NIPSCO is not hedged more than 2-3 years out, as this is typical practice for utilities. It is possible that future natural prices will be significantly higher than current prices, with no hedge against this risk. In the “Aggressive Environmental Regulation” case in their 2021 IRP, NIPSCO performed a sensitivity analysis with high gas prices. Whether gas prices increase in the future due to environmental regulations, or other macroeconomic trends, the result of this



sensitivity analysis showed near identical cost between their preferred portfolio with the CT, and Portfolio H with no new fossil capacity.

Further analysis should be performed to assess the optimal portfolio under additional “high gas price” sensitivities, although the underlying takeaway is that building assets that rely on a volatile fuel is inherently higher risk from an energy cost perspective than investing in renewable resources.

### ***Fuel Supply Risk and Fossil Fuel Asset Reliability Risk***

NIPSCO holds firm transportation contracts on the Midwestern Gas pipeline. This contract has provisions to purchase next day and intraday firm gas supplies. The planned CT will be built within NIPSCO’s local natural gas distribution company service territory, so no new pipelines or contracting with new counterparties will be required. Beyond simply contracting for delivery, energy delivery risk has also been heightened across the country due to more extreme weather events, in particular winter storms. In the recent 2022 Winter Storm Elliot, MISO had significant unplanned outages, largely because of the lack of gas supply availability. As shown in Figure 9, approximately 23 GW of gas resources failed to deliver power during the storm.<sup>9</sup> This type of event has occurred with increased frequency in recent years across the country. Since 2011, four other winter storms have caused at least 15 GW of concurrent forced outages.<sup>10</sup> In 2021, Winter Storm Uri caused over 61 GW of forced outages, leading the Federal Energy Regulatory Commission (“FERC”) and the North American Electric Reliability Council (“NERC”) to recommend revising the reliability standards due to the extreme levels of outage among natural gas assets.

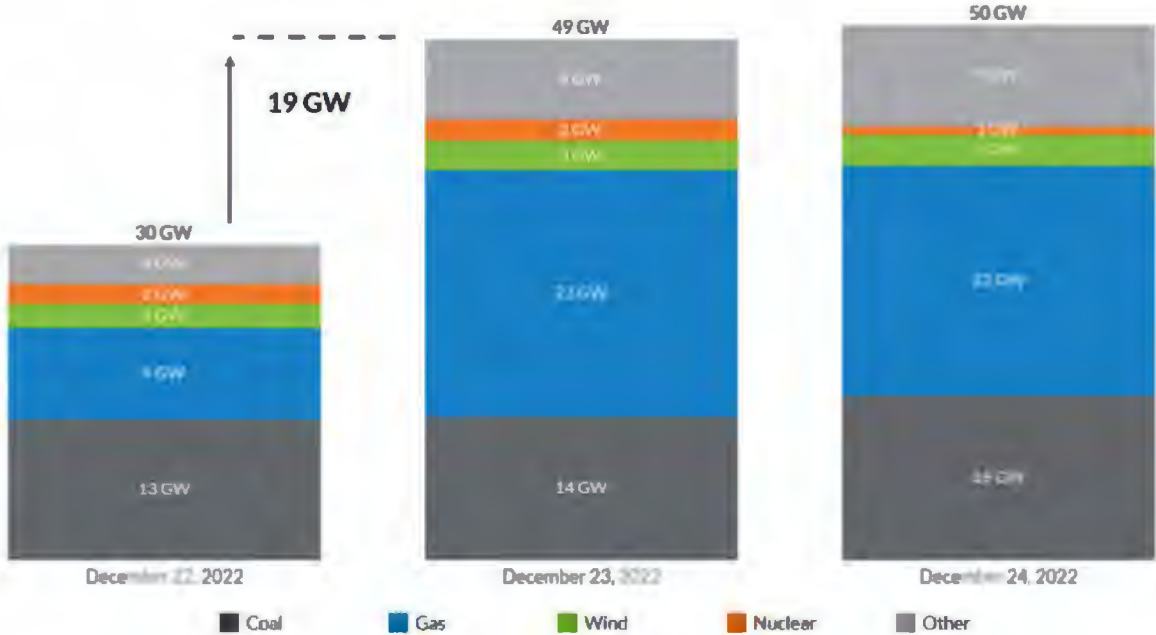
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<sup>9</sup> MISO Reliability Subcommittee, [Overview of Winter Storm Elliott December 23, Maximum Generation Event](#), January 17, 2023

<sup>10</sup> FERC, NERC and Regional Entity Joint Staff Inquiry, [February 2021 Cold Weather Grid Operations: Preliminary Findings and Recommendations](#), October 21, 2021



Figure 9. MISO unplanned outages by resource type during Winter Storm Elliot  
 (Source: MISO Reliability Subcommittee, Overview of Winter Storm Elliott)



**Stranded Asset Risk**

Stranded asset risk is commonly thought of as a forced early retirement of an asset, but there is also stranded asset risk that the economics may change, causing the asset to run at a significantly lower capacity factor and generate far less revenue than originally projected, even as captive ratepayers are locked in to paying its cost. There are several drivers that could lead to this. As renewable costs continue to decline, and with the added benefits from the IRA, more clean energy will be built across MISO. This will likely drive down the average cost of energy, leading to more hours where it is uneconomic to run a less efficient plant like a CT. This could be amplified by high gas prices, as discussed above in the fuel price volatility section.

The other potential driver for stranded asset risk is policy. Currently, policy risk is low for NIPSCO, as Indiana has one of the weakest Renewable Portfolio Standards (“RPS”) in the US. Their RPS is voluntary and only sets a target of 10% clean energy for utilities that elect to participate. However, there is a possibility of a future federal policy for a carbon tax, as included in NIPSCO’s base case scenario. This would increase the cost of generation and limit the number of hours that the CT would be economic to run. This policy, or another federal policy such as a successor to the 2015 Clean Power Plan, would accelerate the obsolescence of the plant.



NIPSCO's IRP does include the possibility that it could pivot and convert the natural gas plant to a green hydrogen facility.<sup>11</sup> While it is good foresight by NIPSCO to recognize the possibility for this need, its analysis does not include the future costs of conversion in the CT economic analysis. Conversion to green hydrogen bears particular uncertainty regarding future capital costs, fuel prices, and fuel availability. Further detailed analysis would be necessary to estimate the costs associated with switching to this option in the future. Existing CT technologies can burn hydrogen blended with natural gas, but defensible estimates on the costs and timeline for feasible transition to run on 100% hydrogen are not currently available. Regarding fuel prices, the U.S. Department of Energy has set a goal of reducing the cost to produce green hydrogen to \$1 per kilogram. If achieved by 2050, this would be equivalent to approximately \$7-8 per MMBtu, which is in the higher range of natural gas prices and would lead to decreased operations of the CT, even before accounting for fuel delivery costs. Availability is also expected to be an issue, as use cases in sectors such as long-haul transportation, aviation, or industrial applications that are more difficult to decarbonize are likely to take priority for using green hydrogen created from renewables through electrolysis.

### ***Impact of Energy Efficiency (“EE”) and Demand Response (“DR”)***

While not quantified in this report, the IRA also provides significant tax benefits for the implementation of EE and DR improvements through programs like the Energy Efficient Home Improvement Credit program. This credit, which is available through 2032, provides up to \$3,200 annually per household to lower the cost of EE/DR home upgrades by up to 30%. EE/DR upgrades include installing heat pumps, heat pump water heaters, insulation, doors and windows, electrical panel upgrades, home energy audits and more.

These new financial incentives will likely have a significant impact on the deployment of EE/DR in Indiana. Beyond simply considering a battery for replacing the proposed CT, NIPSCO could consider an alternative portfolio of battery storage, EE, and DR. This diverse resource approach could further reduce the cost for the utility and its customers by allowing the utility to build a somewhat smaller energy storage facility.

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<sup>11</sup> NIPSCO 2021 IRP, Figure 9-43, [https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/irp/2021-nipsco-integrated-resource-plan.pdf?sfvrsn=f6ae0251\\_6](https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/irp/2021-nipsco-integrated-resource-plan.pdf?sfvrsn=f6ae0251_6)

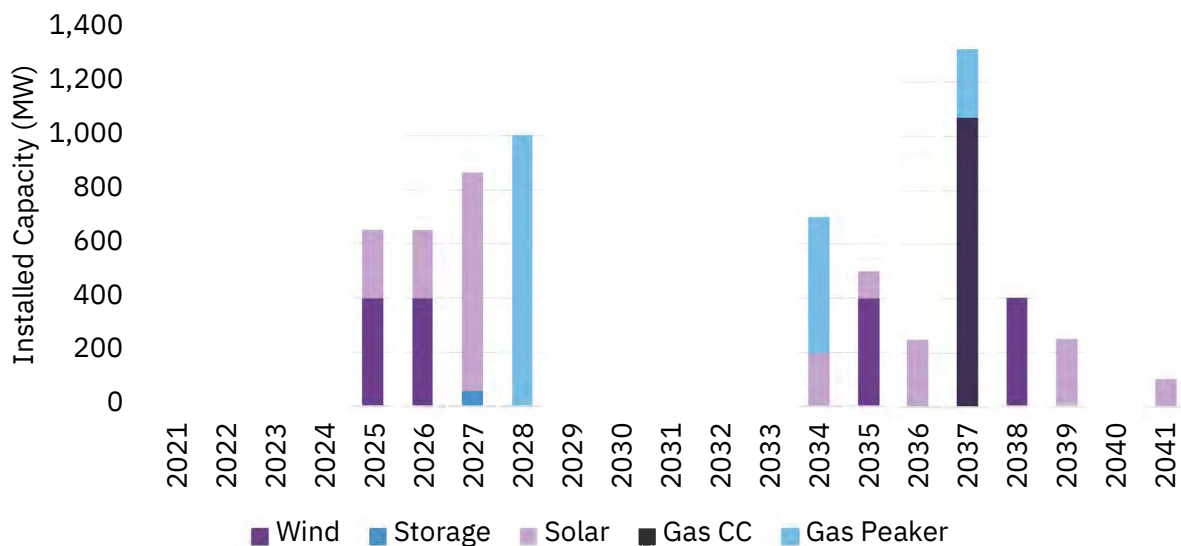


# I&M Peaker Replacement Analysis

## I&M Background

The I&M 2021 IRP is primarily focused on identifying assets to replace 2,600 MW of coal-fired resources at Rockport Units 1 and 2 with their pending retirement in 2028 and 2024, respectively. These assets represent nearly one-half of I&M’s generation fleet capacity. I&M largely plans to replace the capacity of Rockport 1 and 2 with 1,000 MW of natural gas-fired combustion turbines, along with market purchases, solar, wind, storage and DSM. Of the planned resource additions, only 60 MW of storage capacity is planned for installation in 2027, with no other storage for the remainder of the planning horizon, as shown in Figure 10.

**Figure 10. I&M incremental capacity additions by resource type for their preferred portfolio.**



Beyond the reference case upon which the Preferred Portfolio was established, I&M also considered two alternative scenarios of “Rapid Technology Advancement” (i.e., low-cost clean energy and EE scenario), and “Enhanced Regulation” (i.e., high operating costs for fossil fuel resources via fuel costs and carbon tax). The Rapid Technology Advancement scenario assumed a 35% reduction in renewables, storage, and energy efficiency costs. While not exactly identical, this scenario aligns very closely to the current reality with the IRA credits. In this scenario, CT additions from 2022-2028 were reduced from 1,000 MW to 750 MW, and battery storage additions in the same time period increased from 60 MW to 160 MW. In both scenarios, I&M

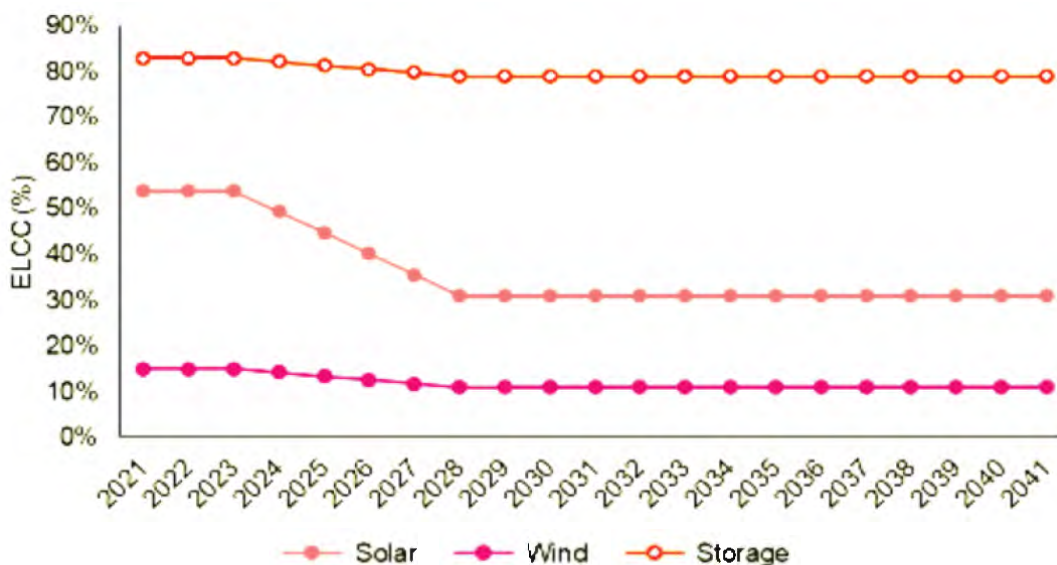




anticipates a capacity shortfall of 313-314 MW that will be satisfied through market purchases.

Unlike the other utilities covered in this report, I&M operates in the PJM Interconnection (“PJM”), not MISO. This means there are different capacity accreditation rules that apply to their resource planning. PJM’s capacity market, called the Reliability Pricing Model (“RPM”), operates with an annual auction, unlike the seasonal auctions in MISO. Variable resources are allowed to bid their ELCC-weighted capacity, based on the expected average performance during the peak summer and winter hours (15:00-20:00 in June-August, 6:00-9:00 and 18:00-21:00 in January-February).<sup>12</sup> The ELCC is calculated at the average level for resource type. Figure 11 shows the ELCC values for clean energy resources in I&M’s 2021 IRP.

**Figure 11. ELCC values for clean energy resources from 2021-2041**  
(Source: I&M 2021 IRP).



One other area of attention for I&M’s IRP and this analysis is regulation ancillary services. In an independent study performed by Lazard, it was found that PJM’s regulation market revenue stream for energy storage far exceeds other markets.<sup>13</sup> As shown in Figure 12, batteries in PJM saw approximately four times the revenue from regulation ancillary services compared to other markets from February 2019-February

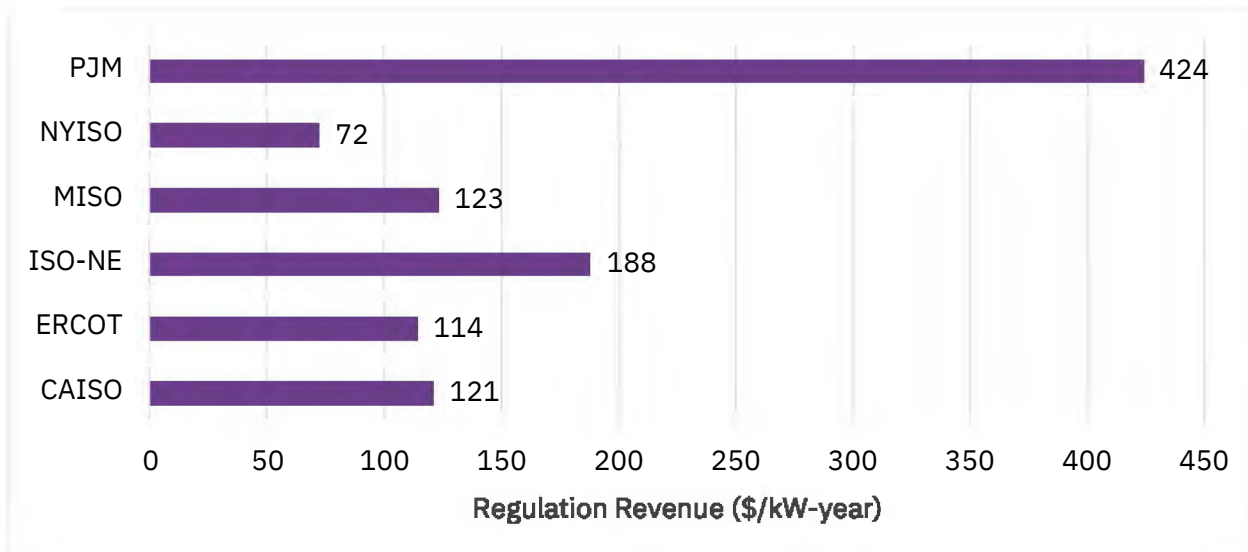
<sup>12</sup> PJM Manual 18: PJM Capacity Market, <https://www.pjm.com/-/media/documents/manuals/m18.ashx>, September 21, 2022

<sup>13</sup> Lazard’s Levelized Cost of Storage Analysis – Version 7.0 <https://www.lazard.com/media/451882/lazards-levelized-cost-of-storage-version-70-vf.pdf>



2020. Lazard identified that these markets lack depth and have a risk of becoming saturated, potentially reducing future earnings. This was considered in a sensitivity analysis, Scenario 5, described in the next section.

**Figure 12. Historical energy storage regulation revenue by market, Feb 2019-Feb 2020.**



## I&M Economic Analysis: Combustion Turbine vs. Battery Storage

Strategen conducted analysis to evaluate the feasibility and cost of an alternative Clean Energy Portfolio for I&M that included greater investments in battery storage in lieu of the proposed 1,000 MW natural gas CT additions. This section describes the assumptions used and findings of that analysis.

### ***Sizing the Battery Storage***

One of the key stated reasons I&M selected the portfolio with the CT was concerns over reliability. As such, any alternative portfolio must at least meet the capacity value of the CT for each season under PJM’s accreditation construct. Using the ELCC values shown in Figure 11, ELCC and capacity accreditation values for the online year of 2028 are shown in Table 4. A 92.5% firm capacity rating was assumed for the CT for all seasons.





**Table 4. Clean Energy Portfolio capacity and energy compared to CT.**

|   | <b>Battery Storage</b> | <b>Combustion Turbine</b> |
|---|------------------------|---------------------------|
| <b>Installed Capacity</b>   | 1,156 MW               | 1,000 MW                  |
| <b>Effective Load Carrying Capability (ELCC) / Firm Capacity Rating</b> | 80%                    | 92.5%                     |
| <b>Capacity Accreditation (2028)</b>                                    | 925 MW                 | 925 MW                    |

**Net Cost Comparison**

The economics of the battery storage and CT were compared under the same four scenarios as NIPSCO (adjusted for the relevant PJM prices), all adjusted to 2022\$ prices considering historical and expected inflation. These scenarios were chosen to assess the sensitivity of each resource in a wide range of future prices, including alternate market power prices, the existence of a carbon price, and possible changes to the PJM regulation market.

1. 2021 Historical Power/Gas Prices + Carbon Price
2. 2021 Historical Power/Gas Prices without Carbon Price
3. 2028 Forward Power/Gas Prices + Carbon Price
4. 2028 Forward Power/Gas Prices without Carbon Price
5. 2021 Historical Power/Gas Prices without Carbon Price, Reduced Regulation Revenue

In I&M’s 2021 IRP, a carbon price was included as a base assumption in the reference scenario. This price was used for Scenarios 1 and 3, while Scenarios 2 and 4 do not include it. In addition, two base price scenarios were used. Scenarios 1 and 2 use 2021 power and gas prices adjusted for inflation, while Scenarios 3 and 4 use 2028 power and gas forward prices. On average, 2028 power forwards are higher than 2021 prices, which favors the CT as there are more hours where it is “in the money” to run economically (see Appendix for price details). Finally, Scenario 5 replicates Scenario 2 but limits the battery’s ability to receive ancillary services revenue from regulation as a sensitivity on PJM market operations.



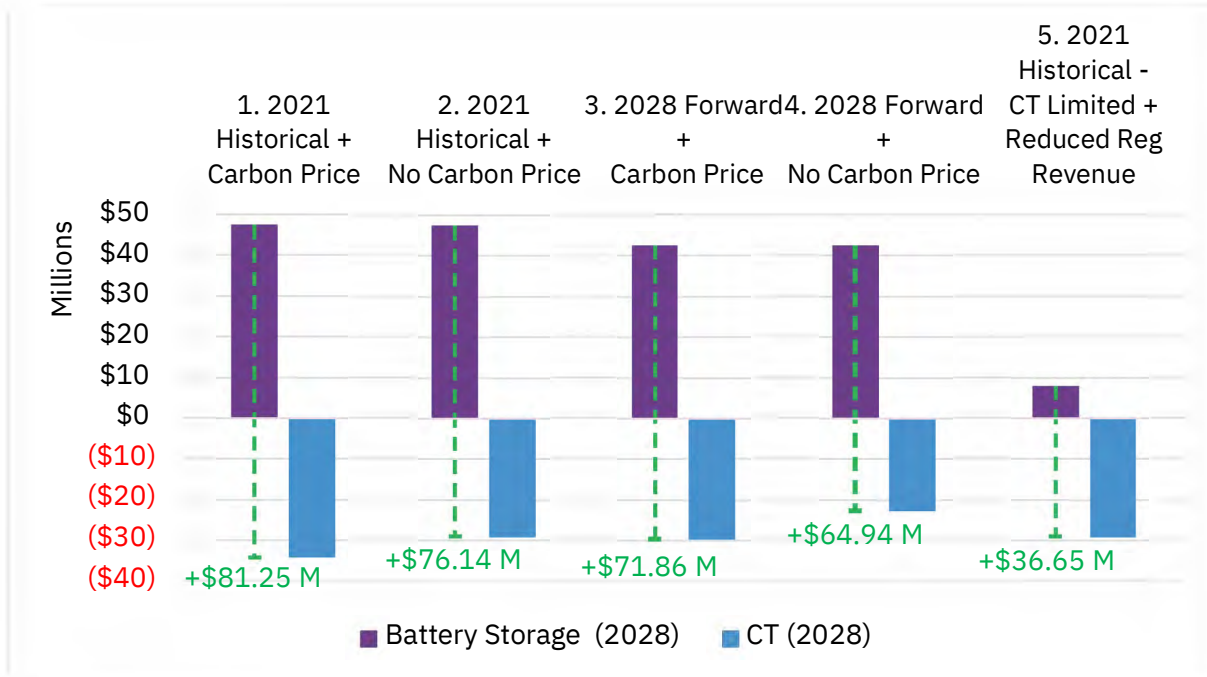
Using the input costs and assumptions detailed in the Appendix, the total fixed cost, (including annualized CapEx and Fixed O&M), and variable costs were calculated for each price scenario. The assets were assumed to operate economically based on PJM wholesale market price signals. The battery was limited to one charge/discharge cycle per day. The analysis estimates the value of the two alternatives, the CT and the battery storage, by comparing the revenue of all of their energy generation at market price. In the hours when the assets are not generating, discharging, or charging, they can provide ancillary services. The CT is assumed to only provide spin, while the battery storage is conservatively assumed to be able to provide regulation in 60% of hours, and spinning reserves in the other 40%, aside from Scenario 5. Ancillary prices were taken using 2021 historical spinning reserves and regulation prices as reported by PJM and adjusted for inflation, consistent across all scenarios. The total net cost of each asset is calculated by subtracting the total costs from the total gross revenue. The asset with the lower net cost will provide a net benefit to the utility and its customers. A positive net cost value indicates that total revenue exceeds total cost. To remain consistent with the other analyses in this report, the net cost calculations do not include capacity revenue. However, since the battery storage is sized such that its accredited capacity matches the CT, the battery storage would have equal capacity revenue in each scenario and so there would be no impact on the overall net benefit calculation.

**Across the five scenarios, battery storage provides an average net benefit of \$66.17 million over the CT in 2028.** Summarized results for all scenarios are shown in Figure 13 below.

The analysis focuses on a single year, but net savings for the battery system are expected to remain in subsequent years. As intermittent renewable generation increases in Indiana, the fast charging and discharging capabilities of batteries will provide added value to the system as a flexible asset. This macro-level trend indicates that the economics of battery storage should remain advantageous even beyond the scope of this analysis. The next sections detail the cost breakdown for each of the five scenarios in the first year of operation.



**Figure 13. I&M 2028 net cost\* across five price scenarios, excluding capacity revenue.**



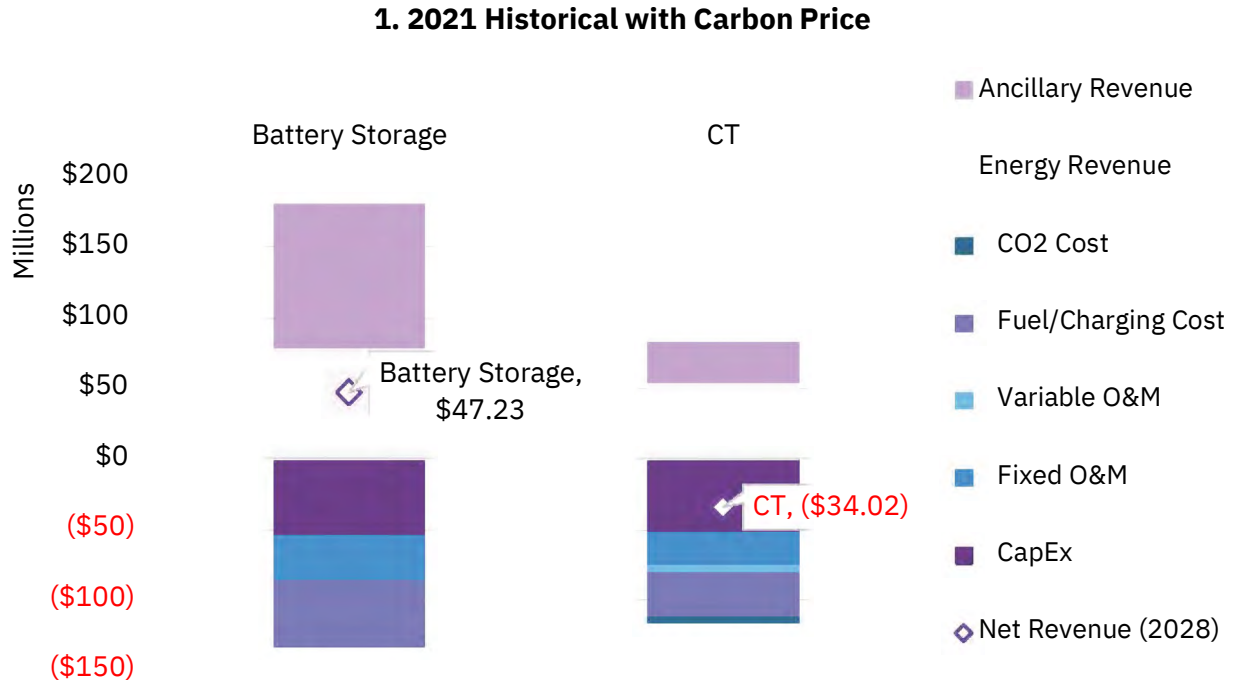
*Note: Net cost includes annualized capital costs, operational costs, and energy and ancillary revenue. Battery Storage net benefit (Battery net cost less CT net cost) shown in green for each scenario.*

**Scenario 1: 2021 Historical Power/Gas Prices with Carbon Price**

In Scenario 1, 2021 historical gas and power prices were used in addition to the carbon price from I&M’s IRP base scenario. The combination of lower average power prices, plus the added hurdle of the carbon price, resulted in the lowest capacity factor for the CT, generating in only 7% of hours. This resulted in relatively low energy revenue for the CT, and an overall net benefit of \$85.25 million for battery storage in 2028. Figure 14 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.



Figure 14. Net cost comparison in Scenario 1, excluding capacity revenue.



**Scenario 2: 2021 Historical Power/Gas Prices without Carbon Price**

Scenario 2 used the same power and gas prices as Scenario 1 but did not include a carbon price. As a result, the capacity factor of the CT increased to 15%. The increased production provided approximately \$5 million in added revenue for the CT compared to Scenario 1, but the overall economics remained in favor of the battery storage with a total net benefit of \$76.15 million in 2028. Figure 15 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

**Scenario 3: 2028 Forward Power/Gas Prices with Carbon Price**

Scenario 3 used 2027 forward prices for power and gas, plus a carbon price. On average, the forward power prices are significantly higher than the inflation-adjusted 2021 historical prices from the prior scenarios. The result is similar to Scenario 1, with the CT capacity factor at 9%. In this scenario the battery storage has a total net benefit of \$71.86 million in 2028. Figure 16 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.



Figure 15. Net cost comparison in Scenario 2, excluding capacity revenue.

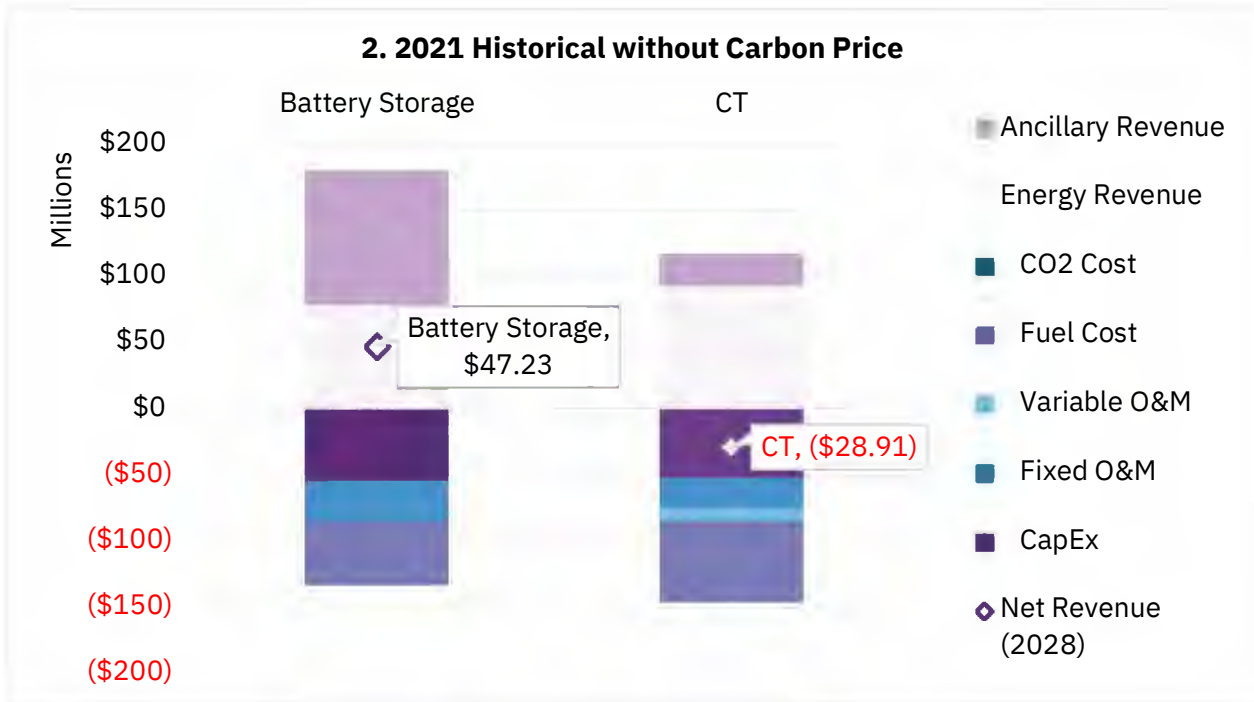
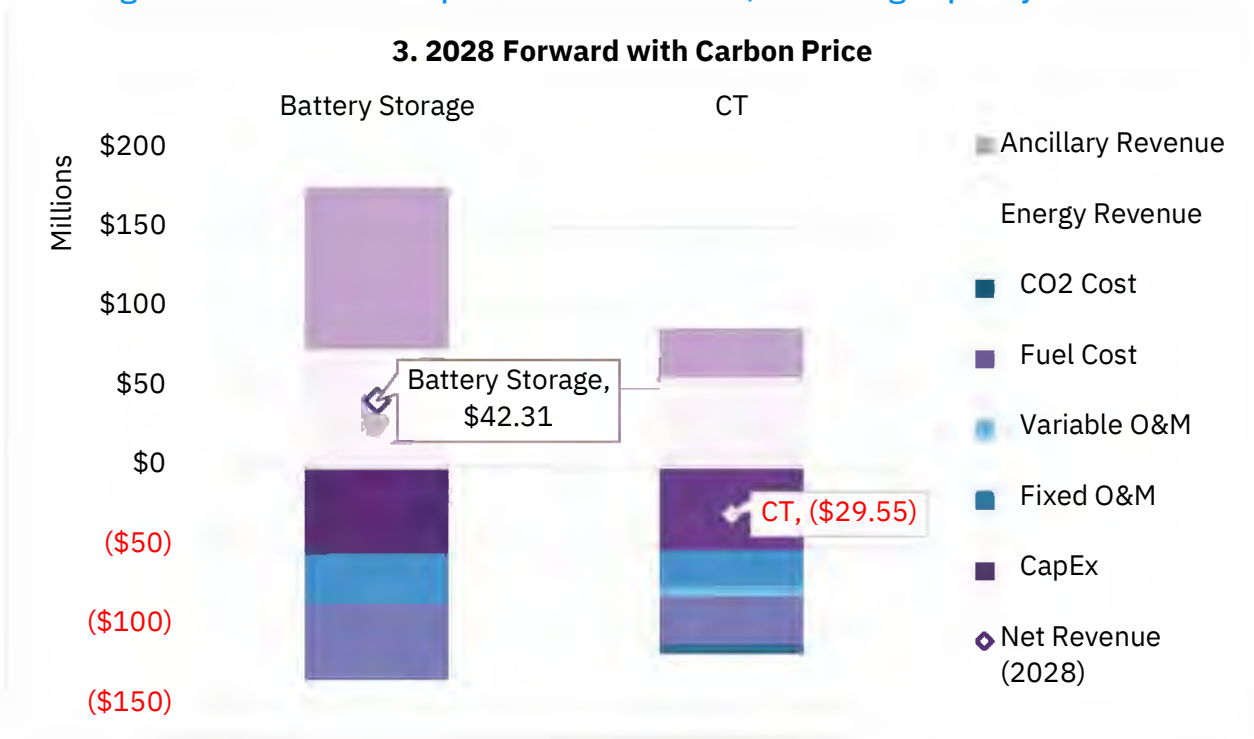


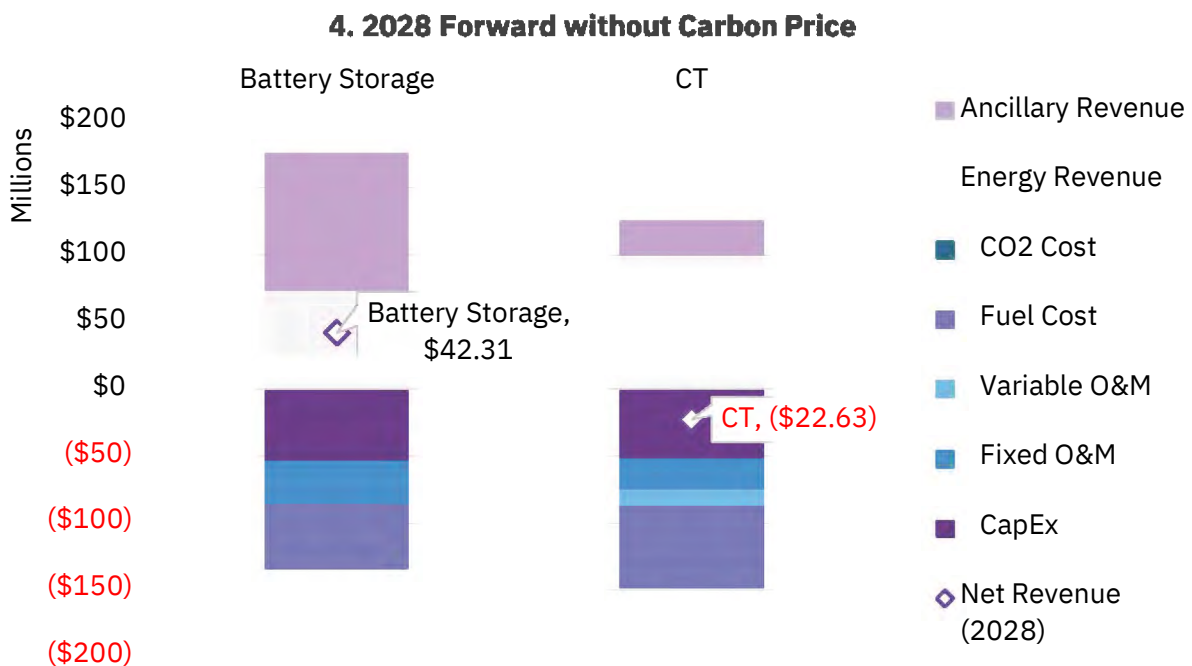
Figure 16. Net cost comparison in Scenario 3, excluding capacity revenue.



**Scenario 4: 2028 Forward Power/Gas Prices without Carbon Price**

Scenario 4 uses the same prices as Scenario 3, but without a carbon price. Like Scenario 2, the lack of carbon price leads to a higher capacity factor for the CT, this time at 18%. This capacity factor is higher than typical but is possible under certain market conditions. Despite the higher capacity factor, battery storage still is substantially more economic than the CT with a net benefit of \$64.94 million in 2028. Figure 17 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

Figure 17. Net cost comparison in Scenario 4, excluding capacity revenue.

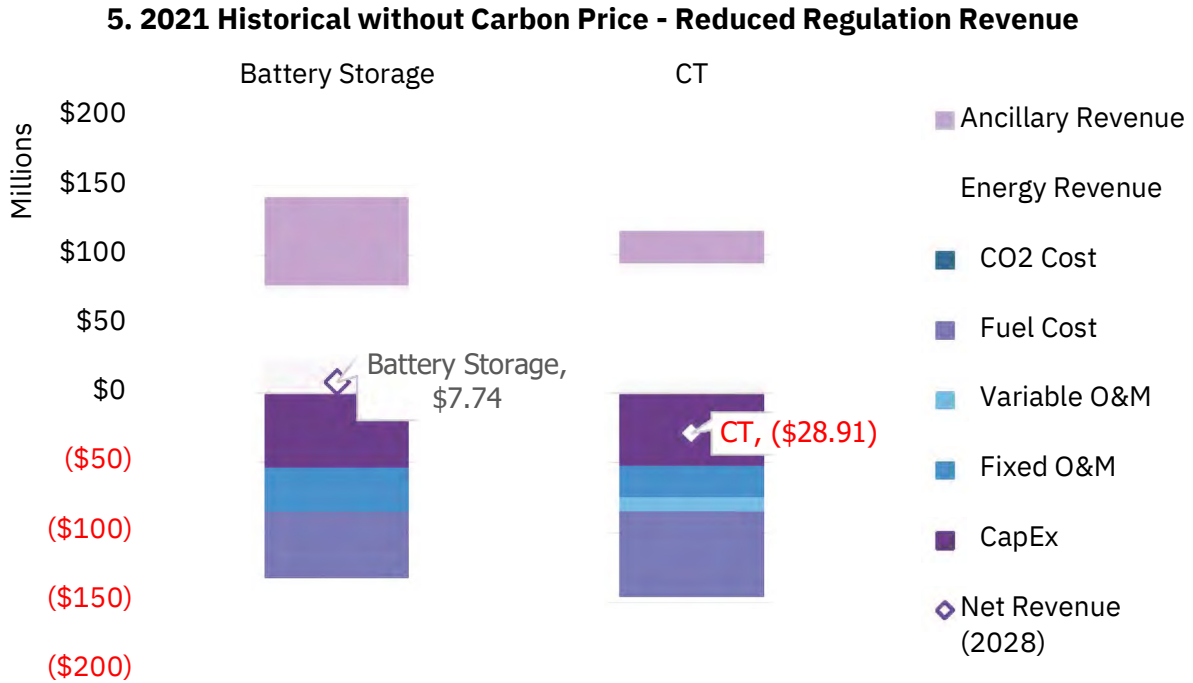


**Scenario 5: 2021 Historical Power/Gas Prices without Carbon Price, Reduced Regulation Revenue**

As a sensitivity for concerns of overreliance on regulation revenue, Scenario 5 was developed to reduce the battery’s percentage of ancillary services dedicated to regulation. This Scenario mimics the prices in Scenario 2, but regulation is reduced to 30% of total ancillary services, compared to 60% in the other scenarios, and spinning reserves is increased to 70%. Even with this conservative estimate, the battery storage is still more economic than the CT, with a total net benefit of \$36.65 million. Figure 18 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.



Figure 18. Net cost comparison in Scenario 5, excluding capacity revenue.



## I&M Additional Considerations

### ***Fuel Price Volatility Risk***

I&M performed stochastic simulations to develop a range of possible gas price futures to assess the resiliency of each portfolio relative to commodity price risk. However, even I&M’s 95<sup>th</sup> percentile forecast has prices not surpassing \$5/MMBtu until 2028, and never exceeding \$5.50/MMBtu during the planning horizon (see Figure 19). Over the last two years, the gas market has shown extreme volatility with many months exceeding the prices in I&M’s highest simulated prices (see Figure 20).





Figure 19. I&M stochastic simulations of Henry Hub annual gas prices.

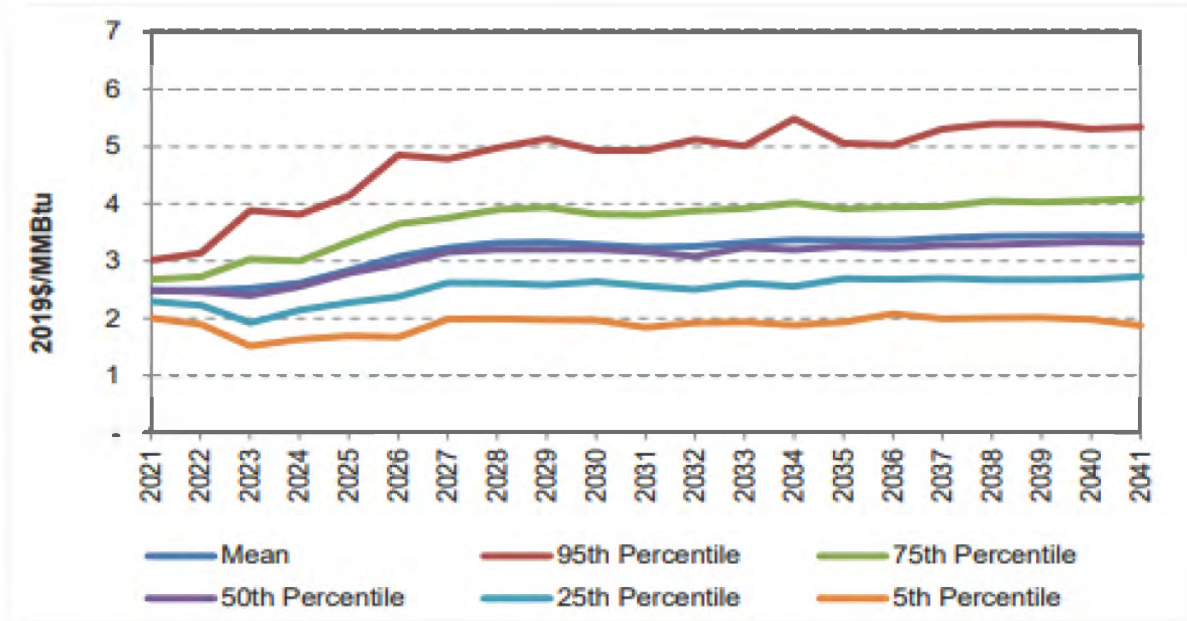


Figure 20. Henry Hub natural gas monthly average prices (Source: S&P Capital IQ).



This has been caused by a variety of factors, including the Russian war in Ukraine, extreme weather events, fuel delivery and availability issues, among others. While it is unclear how the natural gas market will progress over the next decades, it is clear that I&M needs to analyze a wider range of potential price scenarios to more adequately assess the risk of their portfolios. With their proposed natural gas dependent fleet, the economic risk for the company and their customers is likely greater than a renewable-focused portfolio.

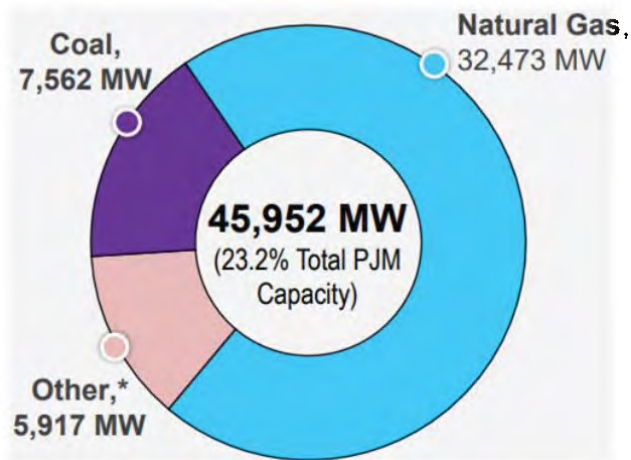




### **Fuel Supply Risk & Fossil Fuel Asset Reliability Risk**

As with MISO, energy delivery risk has also been heightened in PJM due to more extreme weather events, in particular winter storms. In the recent 2022 Winter Storm Elliot, PJM had significant unplanned outages largely due to failure of natural gas resources to deliver power. As shown in Figure 21, over 32 GW of gas resources failed to deliver power during the storm, 38% of all natural gas resources and over 15% of the total installed capacity in PJM.<sup>14</sup> The natural gas outages far exceeded outages of any other resource types. PJM is still assessing the cause of the failures at the time of this report’s publication, but in similar situations a common cause of failure is freezing gas pipelines and loss of pressure to deliver gas to the plants. This type of event has occurred with increased frequency in recent years across the country, forcing utilities and system operators to reconsider the reliability of natural gas assets.

**Figure 21. PJM total forced outages during Winter Storm Elliot (December 24, 2022).**



*\*The category “Other” includes nuclear, oil, wind, solar, etc.*

### **Stranded Asset Risk**

In the event that future policy or regulation limits the operation of the CT, either via carbon emissions limits or a carbon tax that makes the plant uneconomic to operate, I&M’s IRP does state that there is a possibility that it could pivot and convert the natural gas plant to a green hydrogen facility. However, the IRP neither provides a roadmap for how this conversion would occur or what would initiate the conversion, nor does it include future costs of conversion in its cost analysis. Conversion to green hydrogen bears particular uncertainty regarding future capital costs, fuel prices, and

<sup>14</sup> PJM Winter Storm Elliot Overview <https://www.pjm.com/-/media/committees-groups/committees/mic/2023/20230111/item-0x---winter-storm-elliott-overview.ashx> January 11, 2023



availability. Further detailed analysis would be necessary to project and estimate the costs associated with switching to these options in or before 2050. Existing CT technologies can burn hydrogen blended with natural gas, but defensible estimates on the costs and timeline for feasible transition to run on 100% hydrogen are not currently available. Regarding fuel prices, the U.S. Department of Energy has set a goal of reducing the cost to produce green hydrogen to \$1 per kilogram. If achieved by 2050, this would be equivalent to approximately \$7-8 per MMBtu, which is in the higher range of natural gas prices and would lead to decreased operations of the CT, even before accounting for delivery costs. Availability is also expected to be an issue, as use cases in sectors such as long-haul transportation, aviation, or industrial applications that are more difficult to decarbonize are likely to take priority for using green hydrogen created from renewables through electrolysis.

### ***Timing of Resource Deployment***

As shown in Figure 10, I&M's preferred portfolio includes deployment of 500 MW of solar and 800 MW of wind between 2034-2041. Initially, these resources were modeled to be developed in 2025-2026 to take advantage of the old tax credits, but due to logistical constraints I&M reduced the renewable additions during this period by 50% and shifted them to the later years. The logistical constraints were stated to be limitations on "I&M's ability to plan, manage, and develop either the construction or the procurement of these resources."

Since the passing of the IRA, the ITC and PTC have been extended, which may afford I&M the opportunity to develop more wind and solar in early years. Supplemented by the battery storage recommended in this report, the energy and capacity contributions of these clean energy resources may further mitigate the need for fossil fuels in later years.

### ***Impact of Energy Efficiency ("EE") and Demand Response ("DR")***

While not quantified in this report, the IRA also provides significant tax benefits for the implementation of EE and DR improvements through programs like the Energy Efficient Home Improvement Credit program. This credit, which is available through 2032, provides up to \$3,200 annually per household to lower the cost of EE/DR home upgrades by up to 30%. EE/DR upgrades include installing heat pumps, heat pump



water heaters, insulation, doors and windows, electrical panel upgrades, home energy audits and more.

These new financial incentives will likely have a significant impact on the deployment of EE/DR in Indiana. Beyond simply considering a battery for replacing the proposed CT, I&M could consider an alternative portfolio of battery storage, EE, and DR. This diverse resource approach could further reduce the cost for the utility and its customers by allowing the utility to build a somewhat smaller energy storage facility.

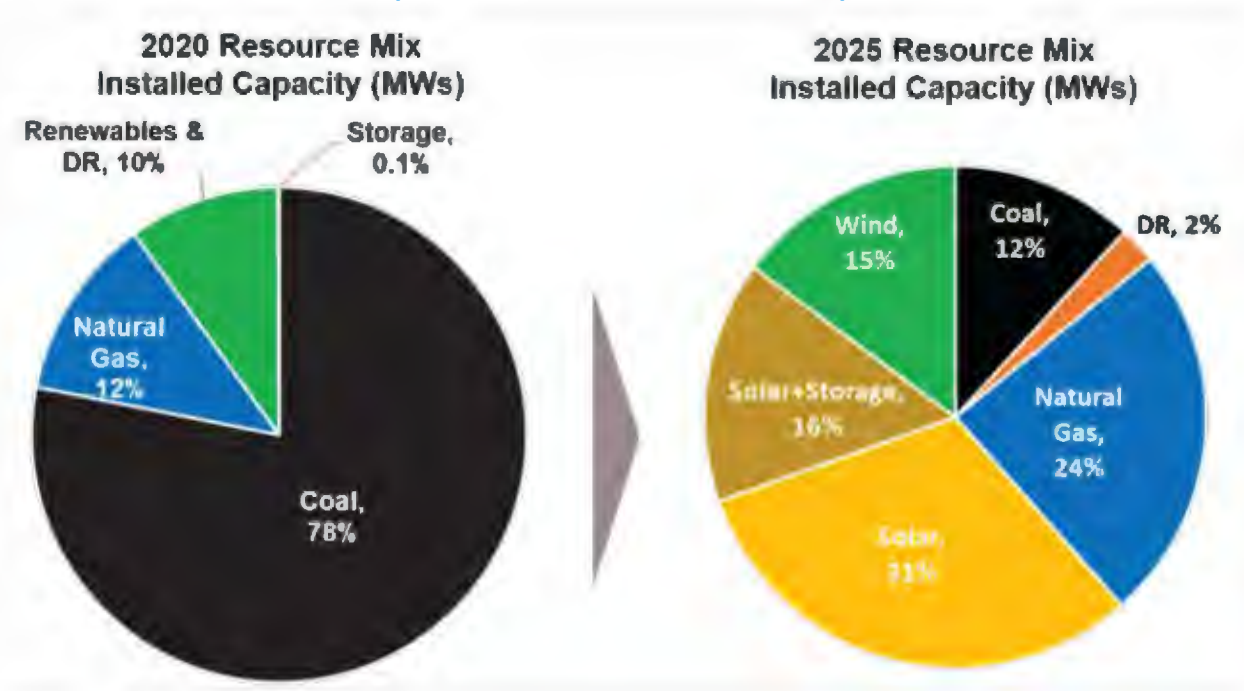


# CenterPoint Peaker Replacement Analysis

## CenterPoint Background

The CenterPoint Energy - Vectren (CenterPoint) 2019/2020 IRP is primarily focused on identifying assets to replace the coal-fired resources Brown Units 1 and 2 and Culley Unit 2 with their pending retirement in 2023, and their exit of a contract with Warrick Unit 4 in 2024. The combined capacity of these assets is 730 MW, nearly 60% of CenterPoint’s total installed capacity. CenterPoint is quickly shifting towards a clean energy portfolio, with plans to add between 700-1,000 MW of solar and battery storage by 2024. But in addition to the clean energy resources, CenterPoint is planning to build two natural gas-fired CTs, a total of 460 MW, to be online by 2025. CenterPoint’s proposed plan is already in motion, as the Indiana Utility Regulatory Commission (“IURC”) has approved CenterPoint’s request for a Certificate of Public Convenience and Necessity (“CPCN”) for the two gas peakers.<sup>15</sup> As seen in Figure 22, the current plan would improve resource diversity, but the doubling of natural gas capacity has potentially negative implications, as discussed further in this section.

Figure 22. CenterPoint's proposed resource mix transition  
(Source: CenterPoint 2020 IRP).



<sup>15</sup> IURC, Cause Number 45564, <https://iurc.portal.in.gov/docketed-case-details/?id=ab9e3466-6ecf-eb11-bacf-001dd801c642>



While CenterPoint’s proposed plan moves in the right direction by significantly reducing coal dependence and increasing renewables, the assumptions that led to the selection of natural gas CTs may no longer be relevant despite the IURC’s approval of the CPCN. The IRP recognizes the potential for battery storage to provide “resilient, dispatchable power” in place of a retiring coal fleet but does not fully commit to the technology. The reasoning provided for the selection of CTs is to allow time for battery storage technology to continue to become more competitive in price and further develop longer duration storage capabilities.”<sup>16</sup> With the passing of the IRA, battery storage pricing has reduced dramatically, and CenterPoint’s justification may no longer be valid. Although a decision has already been made, the following analysis shows that the CT has less economic value than battery storage.

## CenterPoint Economic Analysis: Combustion Turbine vs. Battery Storage

Strategen conducted analysis to evaluate the feasibility and cost of an alternative Clean Energy Portfolio for CenterPoint that included greater investments in battery storage in lieu of the proposed 460 MW natural gas CT additions. This section describes the assumptions used and findings of that analysis.

### ***Sizing the Battery Storage***

Based on MISO’s new seasonal accreditation rules, the battery must be large enough such that it matches the CT in the season with lowest ELCC value. Since CenterPoint’s IRP did not disclose the ELCC values used in their analysis, the battery ELCC values from the NIPSCO analysis in Section 2 were used, as shown in Table 5. A 92.5% firm capacity rating was assumed for the CT for all seasons.

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<sup>16</sup> CenterPoint 2019/2020 IRP <https://midwest.centerpointenergy.com/assets/downloads/planning/irp/2019-2020%20Vectren%20IRP%20-%20Volume%201%20of%202.pdf>



**Table 5. Clean Energy Portfolio capacity and energy compared to CT.**

|   | Battery Storage | Combustion Turbine |
|---|-----------------|--------------------|
| <b>Installed Capacity</b>   | 551 MW          | 460 MW             |
| <b>Effective Load Carrying Capability (ELCC) / Firm Capacity Rating</b> |                 |                    |
| <i>Summer</i>   | 86.0%           | 92.5%              |
| <i>Winter</i>   | 77.3%           | 92.5%              |
| <b>Capacity Accreditation (2025)</b>                                    |                 |                    |
| <i>Summer</i>   | 474 MW          | 426 MW             |
| <i>Winter</i>   | 426 MW          | 426 MW             |

### **Net Cost Comparison**

The economics of the battery storage and CT were compared under three scenarios, all adjusted to 2022\$ prices considering historical and expected inflation. These scenarios were chosen to assess the sensitivity of each resource to market power prices and varying CT capacity factors.

1. 2021 Historical Power/Gas Prices *without* Carbon Price, 3% Capacity Factor
2. 2025 Forward Power/Gas Prices *without* Carbon Price, 3% Capacity Factor
3. 2021 Historical Power/Gas Prices *without* Carbon Price, 5% Capacity Factor

According to the CPCN submitted by CenterPoint for the CT, the anticipated capacity factor of the units was between 2-5%, with an average of 3%.<sup>17</sup> While CenterPoint’s 2021 IRP included a carbon price as a base assumption, it would not be in effect during the first year of operation for the CT. As such it was not included in any scenario. The base scenario is Scenario 1, which used 2021 power and gas prices adjusted for inflation, while Scenarios 2 used 2025 power and gas forward prices. On average, 2025 power forwards are higher than 2021 prices, providing a sensitivity with increased energy revenue streams (see Appendix for price details). Finally, Scenario 3

<sup>17</sup> SOUTHERN INDIANA GAS AND ELECTRIC COMPANY d/b/a CENTERPOINT ENERGY INDIANA SOUTH, IURC CAUSE NO.45564, Direct Testimony of Nelson Bacalao, Principal Consultant, Siemens PTI on Integrated Resource Plan Process and Results, [https://iurc.portal.in.gov/\\_entity/sharepointdocumentlocation/8a5bd661-b7cf-eb11-bacf-001dd801c642/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45564%20CEIS%20Petitioners%20Exhibit%20No%2006%20Direct%20Testimony%20of%20Nelson%20Bacalao.pdf](https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/8a5bd661-b7cf-eb11-bacf-001dd801c642/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45564%20CEIS%20Petitioners%20Exhibit%20No%2006%20Direct%20Testimony%20of%20Nelson%20Bacalao.pdf)



replicates Scenario 1 but increases the CT's capacity factor to 5% to estimate an upper bound on unit operations.

Using the input costs and assumptions detailed in the Appendix, the total fixed cost (including annualized CapEx and Fixed O&M) and variable costs were calculated for each price scenario. As with the other analyses, the assets were assumed to operate economically based on MISO wholesale market price signals. The battery was limited to one charge/discharge cycle per day. The analysis estimates the value of the two alternatives, the CT and the battery storage, by comparing the revenue of all of their energy generation at market price. In the hours when the assets are not generating, discharging, or charging, they can provide ancillary services. The CT is assumed to only provide spin, while the battery storage is conservatively assumed to be able to provide regulation in 60% of hours and spinning reserves in the other 40%. Ancillary prices were taken using 2021 historical spinning reserves and regulation prices as reported by MISO and adjusted for inflation, consistent across all scenarios. The total net cost of each asset is calculated by subtracting the total costs from the total gross revenue. The asset with the lower net cost will provide a net benefit to the utility and its customers.

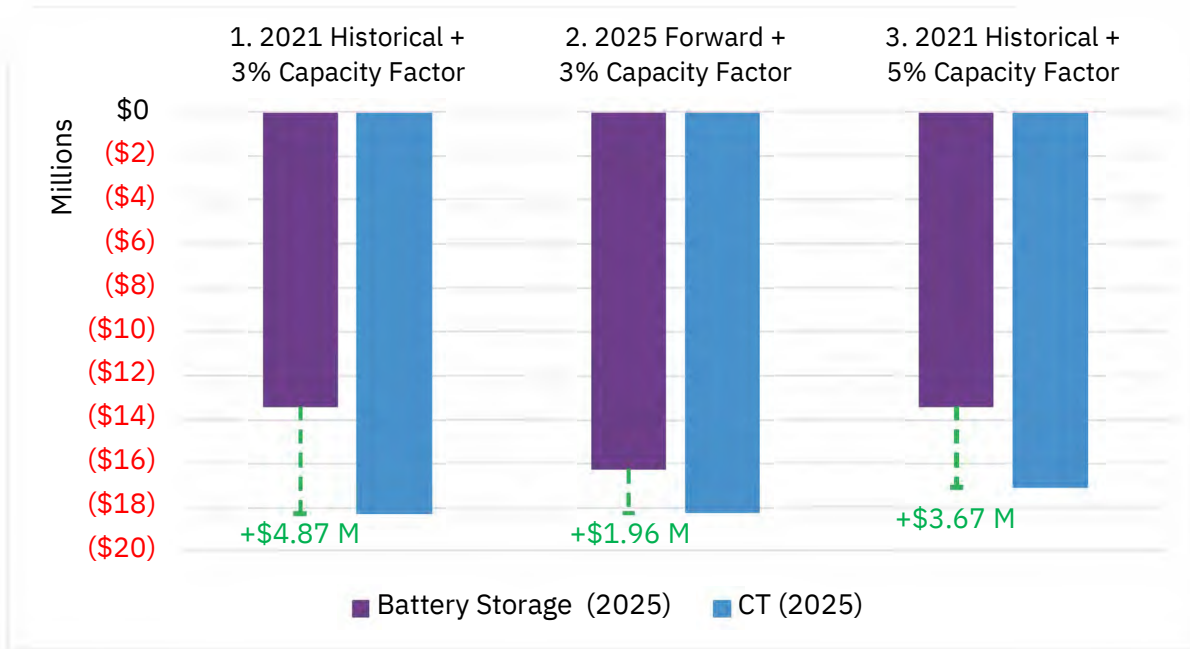
Due to the ongoing changes in the MISO capacity accreditation structure, there are not yet reliable seasonal capacity price forecasts to use for this analysis. As such, the net cost calculations do not include capacity revenue. However, since the battery storage is sized such that, it has accredited capacity greater than or equal to that of the CT in each season, the battery storage would have at least equal capacity revenue in each scenario. In fact, since the battery summer seasonal capacity accreditation is higher than the CT, there is additional battery revenue that is unaccounted for in this analysis that would show an even greater net benefit for the battery.

CenterPoint's IRP identified a logistical limit for the implementation of battery storage of 500 MW per year. As such, the deployment of 551 MW is assumed to take place over two years from 2023-24, incurring higher capital costs. Despite this, **across the three scenarios, battery storage provides an average net benefit of \$3.50 million over the CT in 2025.** Summarized results for all scenarios are shown in the Figure below.





**Figure 23. CenterPoint 2025 net cost\* across three price scenarios, excluding capacity revenue.**



*Note: Net cost includes annualized capital costs, operational costs, and energy and ancillary revenue. Battery Storage net benefit (Battery net cost less CT net cost) shown in green for each scenario.*

The analysis focuses on a single year, but net savings for the battery system are expected to remain in subsequent years. As variable renewable generation increases in Indiana, the fast charging and discharging capabilities of batteries will provide added value to the system as a flexible asset. This macro-level trend indicates that the economics of battery storage should remain advantageous even beyond the scope of this analysis. The next sections detail the cost breakdown for each of the five scenarios in the first year of operation.

**Scenario 1: 2021 Historical Prices Power/Gas without Carbon Price, 3% Capacity Factor**

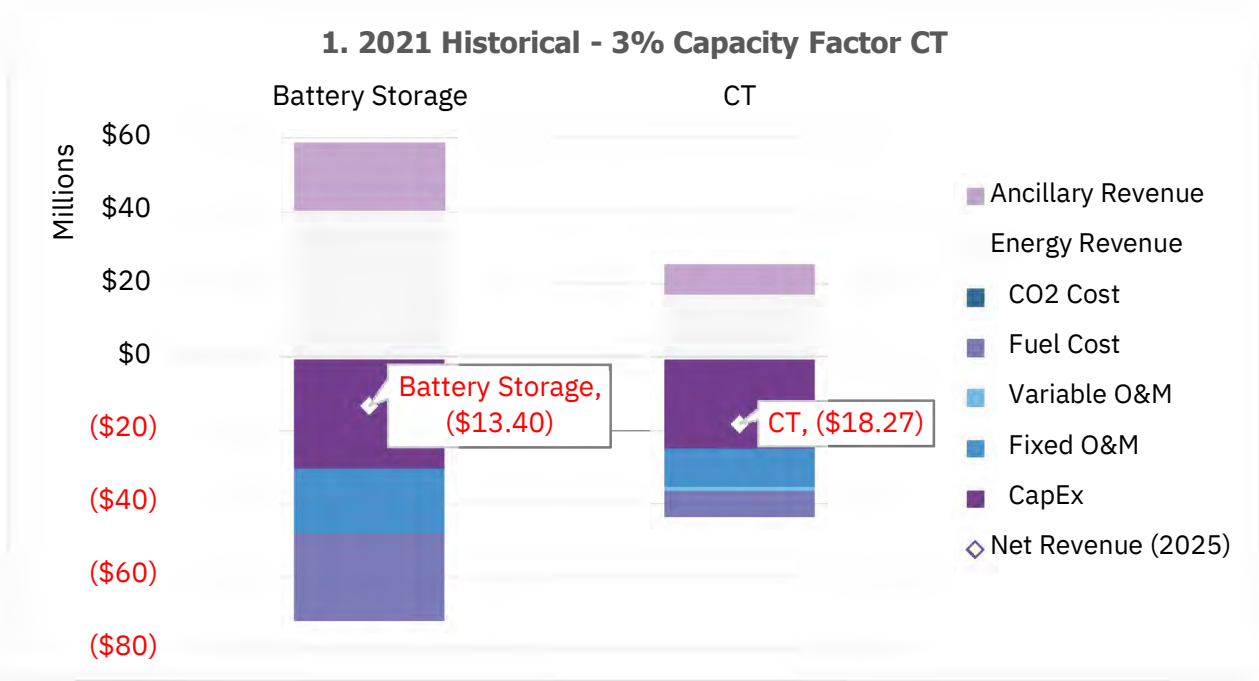
In Scenario 1, 2021 historical gas and power prices were used without a carbon price. As stated in the CPCN, the capacity factor of the CT was limited to 3%. This resulted in relatively low energy revenue for the CT, and an overall net benefit of \$4.87 million for





battery storage in 2025. Figure 24 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

**Figure 24. Net cost comparison in Scenario 1, excluding capacity revenue.**



**Scenario 2: 2025 Forward Power/Gas Prices without Carbon Price, 3% Capacity Factor**

In Scenario 2, 2025 gas and power forwards were used without a carbon price. On average, the forward power prices are significantly higher than the inflation-adjusted 2021 historical prices from the prior scenario. Just as in Scenario 1, the capacity factor of the CT was limited to 3%. The energy revenue for the CT was slightly higher than scenario 1 with 2025 power forwards, but the battery storage still maintained an overall net benefit of \$1.96 million in 2025. Figure 25 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

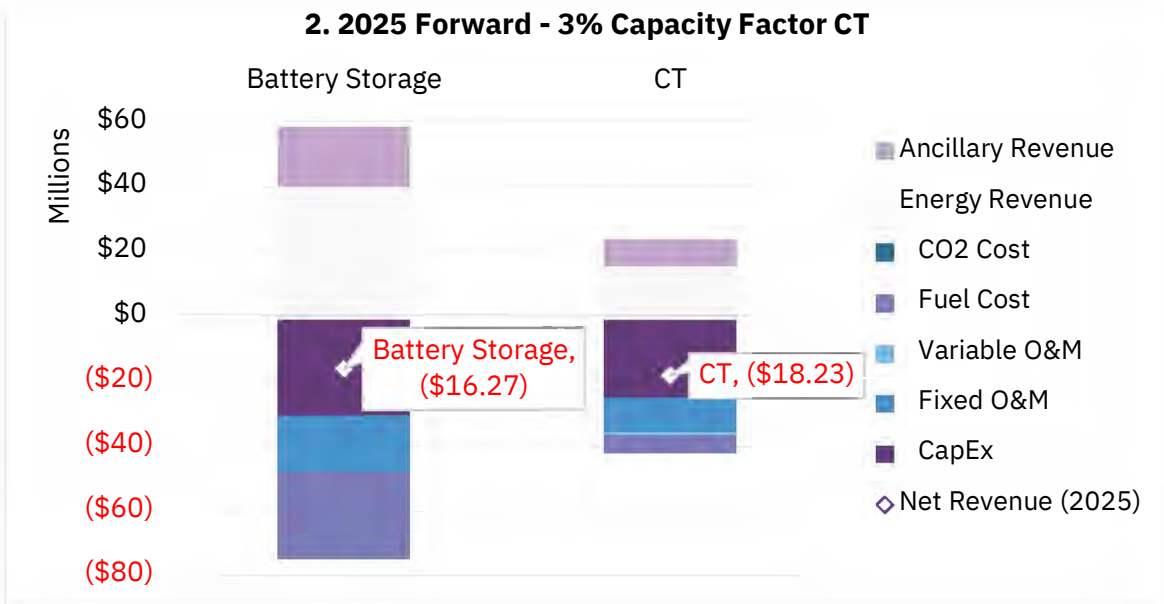
**Scenario 3: 2021 Historical Power/Gas Prices without Carbon Price, 5% Capacity Factor**

Scenario 3 mimics Scenario 1 by using the 2021 historical gas and power prices without a carbon price. To represent the upper bound of CT operations based on CPCN, the capacity factor of the CT was increased to 5%. This resulted in slightly more energy

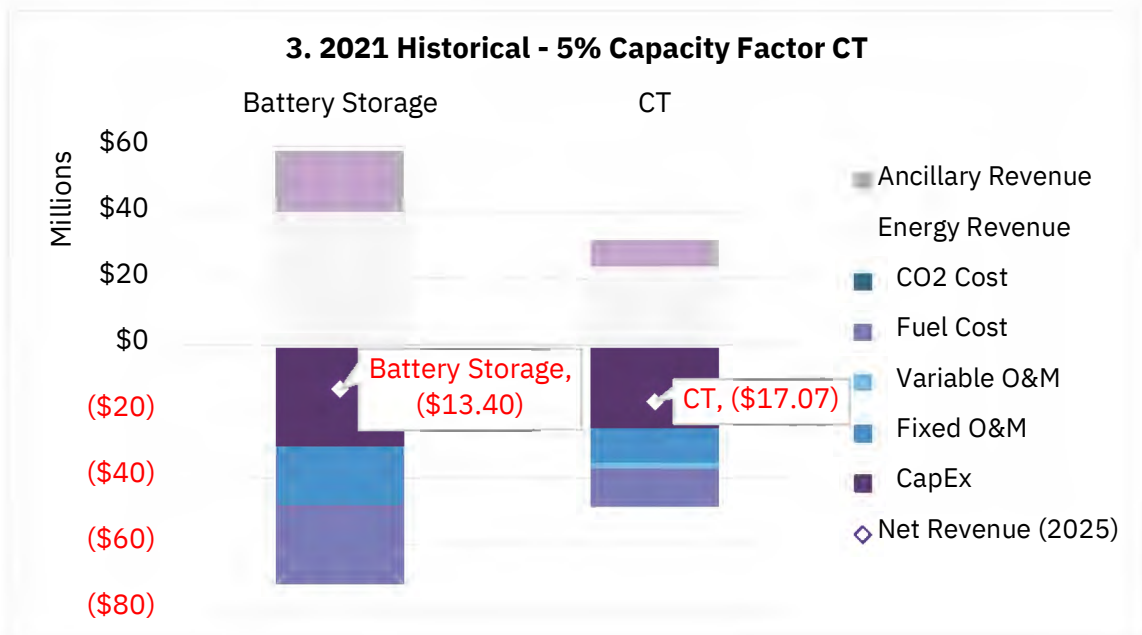


revenue for the CT, but the battery storage remained an economic favorite with an overall net benefit of \$3.66 million for battery storage in 2025. Figure 26 details the cost and revenue components that make up the total net cost for the battery and CT in this scenario.

**Figure 25. Net cost comparison in Scenario 2, excluding capacity revenue.**



**Figure 26. Net cost comparison in Scenario 3, excluding capacity revenue.**

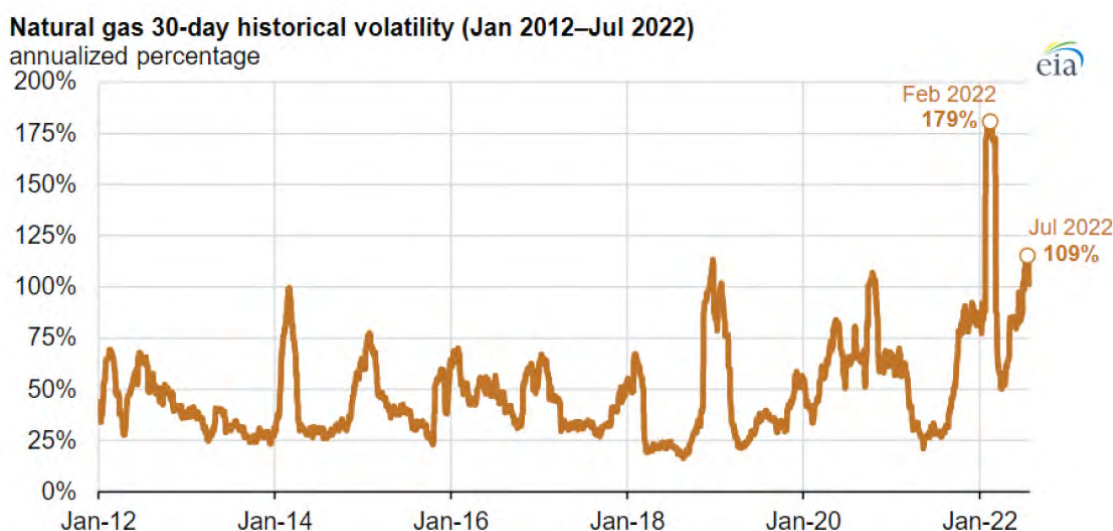


## CenterPoint Additional Considerations

### **Fuel Price Volatility Risk**

CenterPoint performed stochastic simulations to develop a range of possible gas price futures to assess the resiliency of each portfolio relative to commodity price risk. This approach is very valuable to the IRP process, however some of the assumptions stated for the development of the simulations are questionable. Volatility for the future simulations was input based on historical natural gas price volatility, with near-term years using less years of historical data than longer-term simulations. This was done with the expressed intent of allowing simulated volatility to be low in the short-term, moderate in the mid-term, and higher in the long-term. However, since the release of the IRP, the gas market has shown extreme volatility beyond the historical values of the past decade. Rolling 30-day historical gas price volatility is shown in Figure 27.<sup>18</sup>

**Figure 27. U.S. natural gas prices saw record volatility in 2022.**



This has been caused by a variety of factors, including the Russian war in Ukraine, extreme weather events, fuel delivery and availability issues, among others. For planning purposes, it is crucial to not simply rely on historical data but to use fundamental forecasts to incorporate macro-economic trends that may not currently be present but will impact future resource decisions. Incorporating a wider range of natural gas price simulations via higher volatility inputs may have led to a different planning decision in this IRP.

<sup>18</sup> EIA, [U.S. natural gas price saw record volatility in the first quarter of 2022](#)



### ***Fuel Supply Risk & Fossil Fuel Asset Reliability Risk***

CenterPoint currently utilizes non-firm gas pipeline delivery and gas storage for their existing gas peaking units. MISO's seasonal capacity construct however has signaled that dispatchable resources need to be available for service when needed by the system at any time throughout the year, i.e., it is critical for gas delivery to be firm. According to CenterPoint's IRP, they intend to engage with gas distributors to execute firm delivery contracts and have completed initial cost estimate developments with potential service provider Texas Gas. However, there is elevated contracting risk because the utility does not have a similar contract in place currently for these types of assets, and this should be closely monitored.

Beyond simply contracting delivery, energy delivery risk has also been heightened across the country due to more extreme weather events, in particular winter storms. In the recent 2022 Winter Storm Elliot, MISO had significant unplanned outages, largely because of the lack of gas supply availability. As shown in Figure 9, approximately 23 GW of gas resources failed to deliver power during the storm.<sup>19</sup> This type of event has occurred with increased frequency in recent years across the country, forcing utilities and system operators to reconsider the reliability of natural gas assets.

### ***Stranded Asset Risk***

CenterPoint attempts to discuss stranded asset risk in their IRP, however their conclusions appear to miss the mark in addressing the changing market conditions that exist today. The IRP suggests that the CTs provide a bridge to the future because they could be converted to combined cycle (CC) units if the need for baseload arises. This is an extremely unlikely scenario, and generally contradictory to current projections of the energy market. As renewable penetration increases in MISO, the value of flexible resources with fast-ramping capabilities increases, while less flexible assets such as CCs and steam turbines become less important. While CTs are fairly flexible, the instantaneous ramping capabilities of batteries provide even more value with their ability to contribute towards regulation ancillary services.

Whether the units are converted to a CC or remain as a CT, there is implicit economic risk for natural gas assets. As renewable costs continue to decline, and with the added

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<sup>19</sup> MISO Reliability Subcommittee, [Overview of Winter Storm Elliott December 23, Maximum Generation Event](#), January 17, 2023



benefits from the IRA, more clean energy will be built across MISO. This will drive down the average cost of energy, leading to more hours where it is uneconomic to run either a CT or CC. This could be further amplified by high gas prices, as has been the case in much of 2022. If the capacity factor of the asset declines enough, the utility will not be able to recoup the cost of their investment.

***Impact of Energy Efficiency (“EE”) and Demand Response (“DR”)***

While not quantified in this report, the IRA also provides significant tax benefits for the implementation of EE and DR improvements through programs like the Energy Efficient Home Improvement Credit program. This credit, which is available through 2032, provides up to \$3,200 annually per household to lower the cost of EE/DR home upgrades by up to 30%. EE/DR upgrades include installing heat pumps, heat pump water heaters, insulation, doors and windows, electrical panel upgrades, home energy audits and more.

These new financial incentives will likely have a significant impact on the deployment of EE/DR in Indiana. Beyond simply considering a battery for replacing the proposed CT, CenterPoint could consider an alternative portfolio of battery storage, EE, and DR. This diverse resource approach could further reduce the cost for the utility and its customers by allowing the utility to build a somewhat smaller energy storage facility.



## Recommendations

The IRA has dramatically shifted the energy planning space and requires all utilities to reassess their prior plans. The economic incentives for building clean energy resources provide new opportunities for utilities to provide their customers the most competitive rates while also achieving their clean energy and climate goals. Through this analysis, Strategen has identified that battery storage can economically replace each of the three utilities' proposed gas peakers, reducing ratepayer costs while mitigating risks associated with fossil fuel generation.

Not only do the economics favor battery storage for each utility, but the argument for reliability also supports deployment of battery storage resources. Natural gas peakers have been historically preferred by utilities for their ability to provide power during high load or emergency situations, however the recent performance and availability of natural gas plants warrants a serious reconsideration of this preference, as evidenced in MISO and PJM in the latest winter storms. If CTs cannot be counted on to deliver power during the most crucial hours, their value to the utility and overall system reliability drops dramatically.

Given the significant benefits shown herein for replacing CTs with battery storage under a range of scenarios, along with recent lack of performance by natural gas assets in the region and the added benefit of the IRA tax credits, we recommend that NIPSCO, I&M, and CenterPoint re-evaluate their plans to invest in large fossil fuel assets, and consider further investment in battery storage.



# Appendix A – NIPSCO Model Inputs and Detailed Results

## Asset Configurations & Costs

Table 6 specifies the input configurations and costs for the combustion turbine and the battery storage in the NIPSCO analysis. Both combustion turbine and battery storage technology costs are in 2020\$ real prices and are sourced from NREL ATB 2022<sup>20</sup> for deployment in 2026. General assumptions such as IRA tax credits, WACC, and inflation are also included.

**Table 6. Combustion Turbine and Battery Storage input configurations and costs.**

| General                                 |  |              |
|---|--|--------------|
| <b>Construction Year</b>                | 2026   |              |
| <b>Comparison Year</b>                  | 2027   |              |
| <b>Incentives</b>                       | Base IRA (30% ITC)                                       |              |
| <b>Weighted average cost of capital</b> | 7.0%   |              |
| <b>Average inflation rate post-2022</b> | 2.5%   |              |
| Combustion Turbine (CT)                 |  |              |
| <b>Accredited Capacity</b>              | 92.25%   |              |
| <b>Annual Generation</b>                | 248 to 728 GWh, depending on pricing and policy scenario |              |
| <b>CapEx</b>                            | \$809 / kW   |              |
| <b>Fixed O&amp;M</b>                    | \$21 / kW-year   |              |
| <b>Variable O&amp;M</b>                 | \$5 / MWh  |              |
| 4-hour Battery Storage                  |  |              |
| <b>No Credits</b>                       | <b>CapEx</b>   | \$1,057/kW   |
|   | <b>Fixed O&amp;M</b>                                     | \$26/kW-year |
| <b>Base IRA</b>                         | <b>CapEx</b>   | \$740/kW     |
|   | <b>Fixed O&amp;M</b>                                     | \$26/kW-year |

<sup>20</sup> NREL ATB 2022 – Moderate scenario (mid case) <https://atb.nrel.gov/electricity/2022/index>





## Commodity Price Inputs

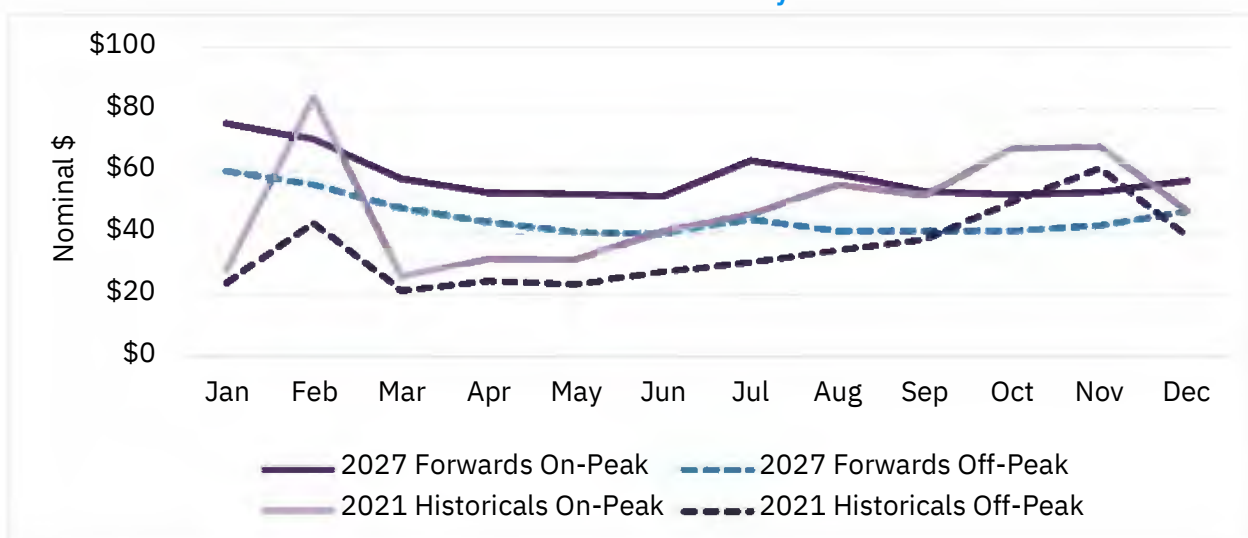
Table 7 specifies the power and gas prices used for the NIPSCO analysis, while Figure 28 specifies the carbon price forecast provided by NIPSCO in their 2021 IRP.

**Table 7. Power and gas prices for NIPSCO analysis.**

| General             |  |
|---------------------|--|
| Gas Forward Curve   | 2027 Henry Hub<br>(Source: NYMEX   Transaction date: January 30 <sup>th</sup> , 2023)                |
| Power Forward Curve | 2027 Indiana Hub On, Off Peak<br>(Source: NYMEX   Transaction date: January 30 <sup>th</sup> , 2023) |
| Power Hourly Prices | 01/01/2021-12/31/2021, scaled to forward curve at average month-peak period price                    |

For the analysis performed for each utility, two base price scenarios were used. First, historical 2021 power and gas prices were taken adjusted for inflation for the year of project deployment. The second scenario uses power and gas forward prices for the first year of operation. As shown in Figure 28, power forwards are notably higher than inflation-adjusted history for many months of the year, providing a sensitivity analysis for each utility.

**Figure 28. MISO Indiana Hub On- and off-peak average monthly prices under each sensitivity.**

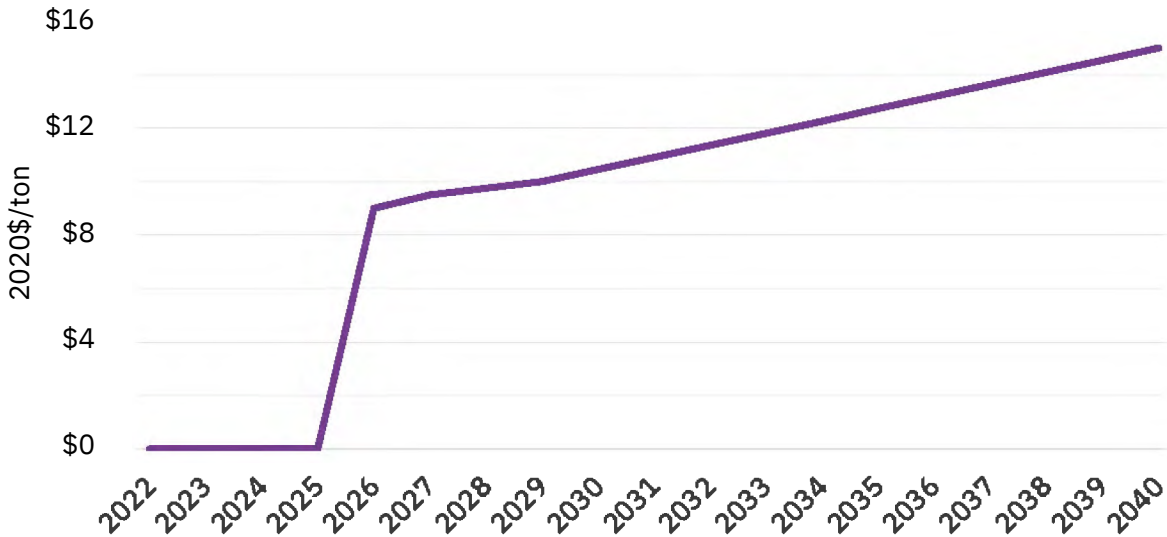


Carbon price forecasts were taken from NIPSCO's IRP, as shown in Figure 29.





Figure 29. NIPSCO 2021 IRP base case carbon price forecast.



## Capacity Inputs

Table 8 specifies the seasonal capacity values for storage in 2027 and 2040. 4-hour battery storage values were calculated using the ICAP and UCAP values calculated in NIPSCO’s IRP.<sup>21</sup> IRP portfolio F is NIPSCO’s Preferred Course of Action (“PCA”). Portfolio H is an alternative portfolio with no peaker and high storage penetration, most accurately matching the portfolio proposed by Strategen. In this scenario in 2027, storage has a summer ELCC value of 84% and a winter ELCC value of 76%.

<sup>21</sup> NIPSCO 2021 IRP, Appendix D: ICAP Capacity Mix (MW) by Portfolio – Replacements; UCAP Capacity Mix (MW) by Portfolio - Replacements



Table 8. Seasonal ELCC values in NIPSCO’s PCA, and in alternative portfolio with no peaker and high storage penetration.

| Year                       | 2027                 |   | 2040                 |   |
|----------------------------|----------------------|---|----------------------|---|
| IRP Portfolio              | Portfolio F<br>(PCA) | Portfolio H<br>(Comparative<br>Portfolio) | Portfolio F<br>(PCA) | Portfolio H<br>(Comparative<br>Portfolio) |
| Storage ICAP (MW)          | 300                  | 735                                       | 500                  | 1,535                                     |
| Storage UCAP - Winter (MW) | 196                  | 560                                       | 317                  | 1,042                                     |
| Storage UCAP - Summer (MW) | 252                  | 616                                       | 373                  | 1,098                                     |
| Storage ELCC - Winter      | 65%                  | <b>76%</b>                                | 63%                  | 68%                                       |
| Storage ELCC - Summer      | 84%                  | 84%                                       | 75%                  | 72%                                       |

## NIPSCO Detailed Results

### Scenario 1: 2021 Historical Prices with Carbon Price

Table 9. Net cost comparison in Scenario 1, excluding capacity revenue.

| All in 2022\$ for year 2027     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$16,390,000)        | (\$16,040,000)        |
| Fixed O&M                       | (\$9,660,000)         | (\$6,870,000)         |
| Variable O&M                    | \$0                   | (\$1,940,000)         |
| Fuel or Charging Cost           | (\$14,280,000)        | (\$12,030,000)        |
| CO <sub>2</sub> Cost            | \$0                   | (\$1,530,000)         |
| <b>Total Cost</b>               | <b>(\$40,330,000)</b> | <b>(\$38,410,000)</b> |
| Energy Revenue                  | \$24,800,000          | \$23,780,000          |
| Ancillary Revenue               | \$10,710,000          | \$4,230,000           |
| <b>Net Cost (2027)</b>          | <b>(\$4,820,000)</b>  | <b>(\$10,400,000)</b> |
| <b>Total Net Benefit (2027)</b> | <b>\$5,580,000</b>    |                       |



**Scenario 2: 2021 Historical Prices without Carbon Price**

**Table 10. Net cost comparison in Scenario 2, excluding capacity revenue.**

| All in 2022\$ for year 2027     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$16,390,000)        | (\$16,040,000)        |
| Fixed O&M                       | (\$9,660,000)         | (\$6,870,000)         |
| Variable O&M                    | \$0                   | (\$3,420,000)         |
| Fuel or Charging Cost           | (\$14,280,000)        | (\$21,080,000)        |
| CO <sub>2</sub> Cost            | \$0                   | \$0                   |
| <b>Total Cost</b>               | <b>(\$40,330,000)</b> | <b>(\$47,400,000)</b> |
| Energy Revenue                  | \$24,800,000          | \$36,230,000          |
| Ancillary Revenue               | \$10,710,000          | \$3,510,000           |
| <b>Net Cost (2027)</b>          | <b>(\$4,820,000)</b>  | <b>(\$7,670,000)</b>  |
| <b>Total Net Benefit (2027)</b> | <b>\$2,850,000</b>    |                       |

**Scenario 3: 2027 Forward Prices with Carbon Price**

**Table 11. Net cost comparison in Scenario 3, excluding capacity revenue.**

| All in 2022\$ for year 2027     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$16,390,000)        | (\$16,040,000)        |
| Fixed O&M                       | (\$9,660,000)         | (\$6,870,000)         |
| Variable O&M                    | \$0                   | (\$3,000,000)         |
| Fuel or Charging Cost           | (\$15,630,000)        | (\$14,530,000)        |
| CO <sub>2</sub> Cost            | \$0                   | (\$2,420,000)         |
| <b>Total Cost</b>               | <b>(\$41,670,000)</b> | <b>(\$42,850,000)</b> |
| Energy Revenue                  | \$24,130,000          | \$29,390,000          |
| Ancillary Revenue               | \$10,700,000          | \$3,600,000           |
| <b>Net Cost (2027)</b>          | <b>(\$6,840,000)</b>  | <b>(\$9,860,000)</b>  |
| <b>Total Net Benefit (2027)</b> | <b>\$3,030,000</b>    |                       |



**Scenario 4: 2027 Forward Prices without Carbon Price**

**Table 12. Net cost comparison in Scenario 4, excluding capacity revenue.**

| All in 2022\$ for year 2027     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$16,390,000)        | (\$16,040,000)        |
| Fixed O&M                       | (\$9,660,000)         | (\$6,870,000)         |
| Variable O&M                    | \$0                   | (\$5,380,000)         |
| Fuel or Charging Cost           | (\$15,630,000)        | (\$26,920,000)        |
| CO <sub>2</sub> Cost            | \$0                   | \$0                   |
| <b>Total Cost</b>               | <b>(\$41,670,000)</b> | <b>(\$55,200,000)</b> |
| Energy Revenue                  | \$24,130,000          | \$46,850,000          |
| Ancillary Revenue               | \$10,700,000          | \$2,560,000           |
| <b>Net Cost (2027)</b>          | <b>(\$6,840,000)</b>  | <b>(\$5,800,000)</b>  |
| <b>Total Net Benefit (2027)</b> | <b>(\$1,040,000)</b>  |                       |

**Scenario 5: 2021 Historical Prices without Carbon Price, CT capacity factor limited.**

**Table 13. Net cost comparison in Scenario 2, excluding capacity revenue.**

| All in 2022\$ for year 2027     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$16,390,000)        | (\$16,040,000)        |
| Fixed O&M                       | (\$9,660,000)         | (\$6,870,000)         |
| Variable O&M                    | \$0                   | (\$530,000)           |
| Fuel or Charging Cost           | (\$14,280,000)        | (\$3,980,000)         |
| CO <sub>2</sub> Cost            | \$0                   | \$0                   |
| <b>Total Cost</b>               | <b>(\$40,330,000)</b> | <b>(\$27,410,000)</b> |
| Energy Revenue                  | \$24,800,000          | \$10,850,000          |
| Ancillary Revenue               | \$10,710,000          | \$5,000,000           |
| <b>Net Cost (2027)</b>          | <b>(\$4,820,000)</b>  | <b>(\$11,560,000)</b> |
| <b>Total Net Benefit (2027)</b> | <b>\$6,740,000</b>    |                       |



## Appendix B – I&M Model Inputs and Detailed Results

### Asset Configurations & Costs

Table 14 specifies the input configurations and costs for the combustion turbine and the battery storage in the I&M analysis. Both combustion turbine and battery storage technology costs are in 2020\$ real prices and are sourced from NREL ATB 2022 for deployment in 2027. General assumptions such as IRA tax credits, WACC, and inflation are also included.

**Table 14. Combustion Turbine and Battery Storage input configurations and costs.**

| General                          |  |              |
|----------------------------------|--|--------------|
| Construction Year                | 2027   |              |
| Comparison Year                  | 2028   |              |
| Incentives                       | Base IRA (30% ITC)   |              |
| Weighted average cost of capital | 7.0%   |              |
| Average inflation rate post-2022 | 2.5%   |              |
| Combustion Turbine (CT)          |  |              |
| Accredited Capacity              | 92.25%   |              |
| Annual Generation                | 433 to 1,618 GWh, depending on pricing and policy scenario |              |
| CapEx                            | \$798 / kW   |              |
| Fixed O&M                        | \$21 / kW-year   |              |
| Variable O&M                     | \$5 / MWh  |              |
| 4-hour Battery Storage           |  |              |
| No Credits                       | CapEx  | \$1,015/kW   |
|                                  | Fixed O&M  | \$25/kW-year |
| Base IRA                         | CapEx  | \$711/kW     |
|                                  | Fixed O&M  | \$25/kW-year |

### Commodity Price Inputs

Table 15 specifies the source of the power and gas prices used for the I&M analysis, with power prices displayed in Figure 29.



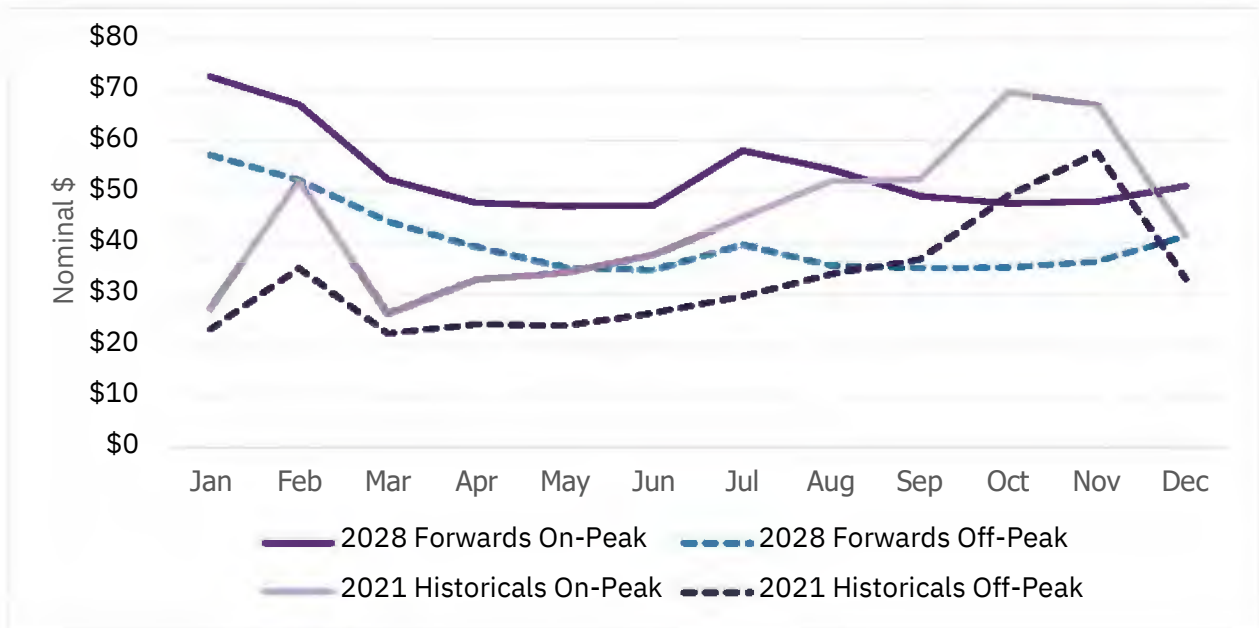


**Table 15. Power and gas prices for I&M analysis.**

| General             |  |
|---------------------|--|
| Gas Forward Curve   | 2028 Henry Hub<br>(Source: NYMEX   Transaction date: January 30 <sup>th</sup> , 2023)                |
| Power Forward Curve | 2028 PJM AEP Hub On, Off Peak<br>(Source: NYMEX   Transaction date: January 30 <sup>th</sup> , 2023) |
| Power Hourly Prices | 01/01/2021-12/31/2021, scaled to forward curve at average month-peak period price                    |

For the analysis performed for each utility, two base price scenarios were used. First, historical 2021 power and gas prices were taken adjusted for inflation for the year of project deployment. The second scenario uses power and gas forward prices for the first year of operation. As shown in Figure 30, power forwards are notably higher than inflation-adjusted history for many months of the year, providing a sensitivity analysis for each utility.

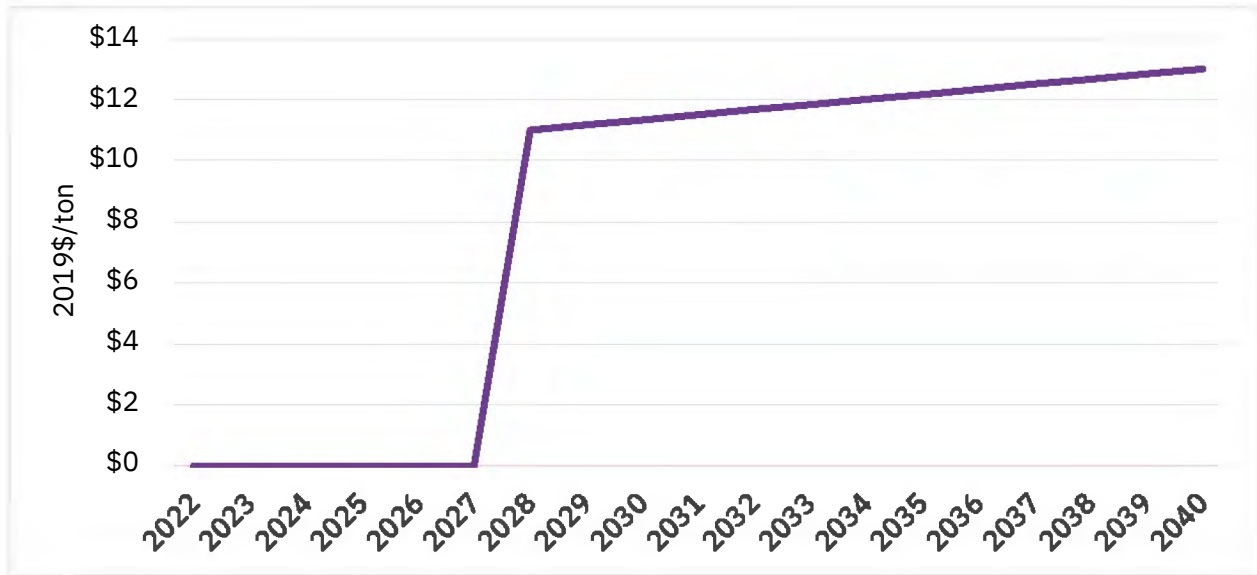
**Figure 30. PJM AEP Hub On- and off-peak average monthly prices under each sensitivity.**



Carbon price forecasts were taken from the base scenario of I&M’s IRP, as shown in Figure 31. The base scenario is the low-end estimate from the IRP, with high end projections up to \$48/ton by 2040.



Figure 31. I&M 2021 IRP base case carbon price forecast.



## Capacity Inputs

Table 16 specifies the capacity values for 4-hour battery storage values provided in I&M’s IRP.<sup>22</sup>

Table 16. Storage ELCC values in I&M’s IRP.

| Year                | 2024 | 2028 | 2032 | 2036 | 2040 |
|---------------------|------|------|------|------|------|
| 4-hour Storage ELCC | 84%  | 80%  | 80%  | 79%  | 79%  |

<sup>22</sup> Indiana Michigan Power 2021 Integrated Resource Plan, <https://www.indianamichiganpower.com/lib/docs/community/projects/IM-irp/2021IMIRPReportRevised.pdf>



## I&M Detailed Results

### Scenario 1: 2021 Historical Prices with Carbon Price

Table 17. Net cost comparison in Scenario 1, excluding capacity revenue.

| All in 2022\$ for year 2028     | Battery Storage        | CT                     |
|---------------------------------|------------------------|------------------------|
| CapEx                           | (\$54,270,000)         | (\$52,730,000)         |
| Fixed O&M                       | (\$31,980,000)         | (\$22,890,000)         |
| Variable O&M                    | \$0                    | (\$5,220,000)          |
| Fuel or Charging Cost           | (\$46,520,000)         | (\$31,220,000)         |
| CO <sub>2</sub> Cost            | \$0                    | (\$4,090,000)          |
| <b>Total Cost</b>               | <b>(\$132,770,000)</b> | <b>(\$116,160,000)</b> |
| Energy Revenue                  | \$79,400,000           | \$54,310,000           |
| Ancillary Revenue               | \$100,600,000          | \$27,830,000           |
| Net Cost (2028)                 | \$47,230,000           | (\$34,020,000)         |
| <b>Total Net Benefit (2028)</b> | <b>\$81,250,000</b>    |                        |

### Scenario 2: 2021 Historical Prices without Carbon Price

Table 18. Net cost comparison in Scenario 2, excluding capacity revenue.

| All in 2022\$ for year 2028     | Battery Storage        | CT                     |
|---------------------------------|------------------------|------------------------|
| CapEx                           | (\$54,270,000)         | (\$52,730,000)         |
| Fixed O&M                       | (\$31,980,000)         | (\$22,890,000)         |
| Variable O&M                    | \$0                    | (\$9,890,000)          |
| Fuel or Charging Cost           | (\$46,520,000)         | (\$59,930,000)         |
|                                 | \$0                    | \$0                    |
| <b>Total Cost</b>               | <b>(\$132,770,000)</b> | <b>(\$145,440,000)</b> |
| Energy Revenue                  | \$79,400,000           | \$93,930,000           |
| Ancillary Revenue               | \$100,600,000          | \$22,590,000           |
| Net Cost (2028)                 | \$47,230,000           | (\$28,910,000)         |
| <b>Total Net Benefit (2028)</b> | <b>\$76,150,000</b>    |                        |





### Scenario 3: 2028 Forward Prices with Carbon Price

Table 19. Net cost comparison in Scenario 3, excluding capacity revenue.

| All in 2022\$ for year 2028     | Battery Storage        | CT                     |
|---------------------------------|------------------------|------------------------|
| CapEx                           | (\$54,270,000)         | (\$52,730,000)         |
| Fixed O&M                       | (\$31,980,000)         | (\$22,890,000)         |
| Variable O&M                    | \$0                    | (\$6,260,000)          |
| Fuel or Charging Cost           | (\$46,870,000)         | (\$29,470,000)         |
|                                 | \$0                    | (\$5,030,000)          |
| <b>Total Cost</b>               | <b>(\$133,120,000)</b> | <b>(\$116,370,000)</b> |
| Energy Revenue                  | \$74,540,000           | \$57,240,000           |
| Ancillary Revenue               | \$100,890,000          | \$29,590,000           |
| Net Cost (2028)                 | \$42,310,000           | (\$29,550,000)         |
| <b>Total Net Benefit (2028)</b> | <b>\$71,860,000</b>    |                        |

### Scenario 4: 2028 Forward Prices without Carbon Price

Table 20. Net cost comparison in Scenario 4, excluding capacity revenue.

| All in 2022\$ for year 2028     | Battery Storage        | CT                     |
|---------------------------------|------------------------|------------------------|
| CapEx                           | (\$54,270,000)         | (\$52,730,000)         |
| Fixed O&M                       | (\$31,980,000)         | (\$22,890,000)         |
| Variable O&M                    | \$0                    | (\$12,260,000)         |
| Fuel or Charging Cost           | (\$46,870,000)         | (\$59,900,000)         |
|                                 | \$0                    | \$0                    |
| <b>Total Cost</b>               | <b>(\$133,120,000)</b> | <b>(\$147,770,000)</b> |
| Energy Revenue                  | \$74,540,000           | \$100,550,000          |
| Ancillary Revenue               | \$100,890,000          | \$24,590,000           |
| Net Cost (2028)                 | \$42,310,000           | (\$22,630,000)         |
| <b>Total Net Benefit (2028)</b> | <b>\$64,940,000</b>    |                        |



**Scenario 5: 2021 Historical Prices without Carbon Price, Reduced Regulation Revenue**

**Table 21. Net cost comparison in Scenario 5, excluding capacity revenue.**

| All in 2022\$ for year 2028     | Battery Storage        | CT                     |
|---------------------------------|------------------------|------------------------|
| CapEx                           | (\$54,270,000)         | (\$52,730,000)         |
| Fixed O&M                       | (\$31,980,000)         | (\$22,890,000)         |
| Variable O&M                    | \$0                    | (\$9,890,000)          |
| Fuel or Charging Cost           | (\$46,520,000)         | (\$59,930,000)         |
|                                 | \$0                    | \$0                    |
| <b>Total Cost</b>               | <b>(\$132,770,000)</b> | <b>(\$145,440,000)</b> |
| Energy Revenue                  | \$79,400,000           | \$93,930,000           |
| Ancillary Revenue               | \$61,110,000           | \$22,590,000           |
| Net Cost (2028)                 | \$7,740,000            | (\$28,910,000)         |
| <b>Total Net Benefit (2028)</b> | <b>\$36,650,000</b>    |                        |



## Appendix C – CenterPoint Model Inputs and Detailed Results

### Asset Configurations & Costs

Table 22 specifies the input configurations and costs for the combustion turbine and the battery storage in the CenterPoint analysis. Both combustion turbine and battery storage technology costs are in 2020\$ real prices and are sourced from NREL ATB 2022 for deployment in 2023-24. General assumptions such as IRA tax credits, WACC, and inflation are also included.

**Table 22. Combustion Turbine and Battery Storage input configurations and costs.**

| General                          |  |              |
|----------------------------------|--|--------------|
| Construction Year                | 2023-24  |              |
| Comparison Year                  | 2025   |              |
| Incentives                       | Base IRA (30% ITC)                                       |              |
| Weighted average cost of capital | 7.0%   |              |
| Average inflation rate post-2022 | 2.5%   |              |
| Combustion Turbine (CT)          |  |              |
| Accredited Capacity              | 92.25%   |              |
| Annual Generation                | 122 to 202 GWh, depending on pricing and policy scenario |              |
| CapEx                            | \$853 and \$833 /kW for deployment in 2023 and 2024      |              |
| Fixed O&M                        | \$21 / kW-year   |              |
| Variable O&M                     | \$5 / MWh  |              |
| 4-hour Battery Storage           |  |              |
| No Credits                       | CapEx  | \$1,167/kW   |
|                                  | Fixed O&M  | \$29/kW-year |
| Base IRA                         | CapEx  | \$817/kW     |
|                                  | Fixed O&M  | \$29/kW-year |



## Commodity Price Inputs

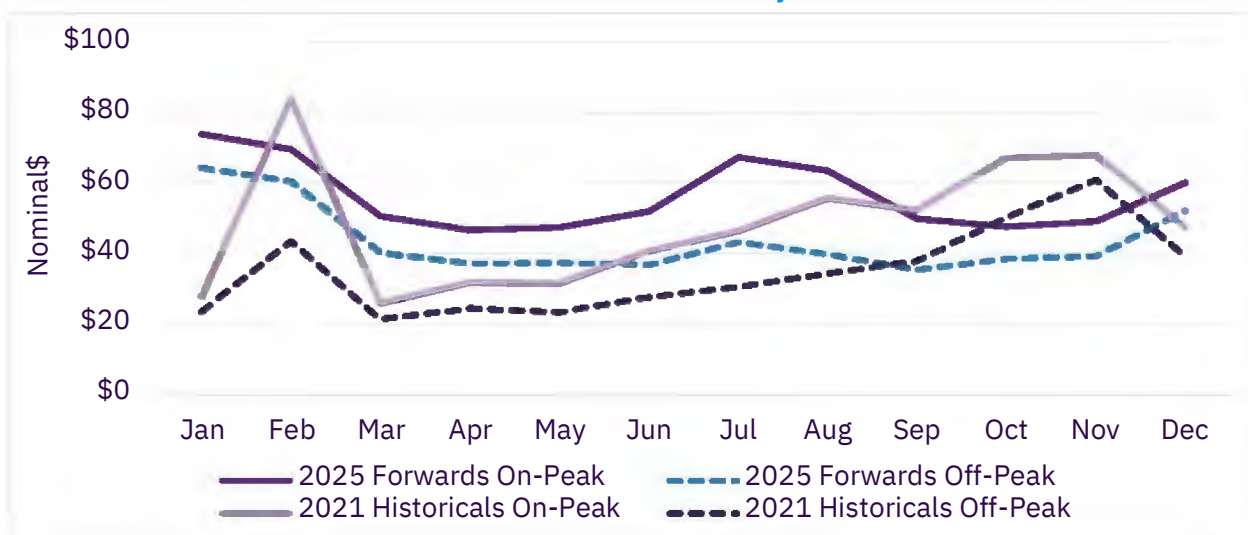
Table 23 specifies the source of the power and gas prices used for the CenterPoint analysis, displayed in Figure 31.

**Table 23. Power and gas prices for I&M analysis.**

| General             |  |
|---------------------|--|
| Gas Forward Curve   | 2025 Henry Hub<br>(Source: NYMEX   Transaction date: January 30 <sup>th</sup> , 2023)                |
| Power Forward Curve | 2025 Indiana Hub On, Off Peak<br>(Source: NYMEX   Transaction date: January 30 <sup>th</sup> , 2023) |
| Power Hourly Prices | 01/01/2021-12/31/2021, scaled to forward curve at average month-peak period price                    |

For the analysis performed for each utility, two base price scenarios were used. First, historical 2021 power and gas prices were taken adjusted for inflation for the year of project deployment. The second scenario uses power and gas forward prices for the first year of operation. As shown in Figure 32, power forwards are notably higher than inflation-adjusted history for many months of the year, providing a sensitivity analysis for each utility.

**Figure 32. MISO Indiana Hub On- and off-peak average monthly prices under each sensitivity.**

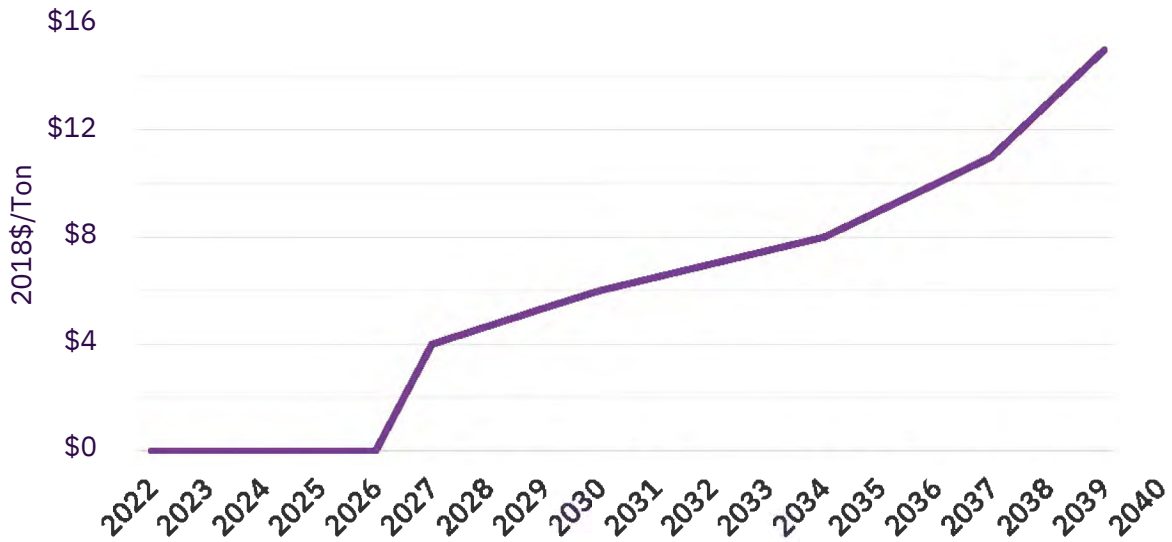


Carbon price forecasts were taken from CenterPoint IRP, as shown in Figure 33. Importantly, this carbon price is forecasted to start after the comparison year and is



not included in the analysis, but it will affect the value of the capacity asset going forward.

Figure 33. Center Point 2019/2020 IRP reference case carbon price forecast.



## Capacity Inputs

CenterPoint did not provide ELCC values for battery storage in their IRP. For this analysis, the same ELCC values calculated for NIPSCO were used for CenterPoint. Please refer to Table 8.



## CenterPoint Detailed Results

### Scenario 1: 2021 Historical Prices without Carbon Price, 3% Capacity Factor

Table 24. Net cost comparison in Scenario 1, excluding capacity revenue.

| All in 2022\$ for year 2025     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$30,760,000)        | (\$25,320,000)        |
| Fixed O&M                       | (\$17,520,000)        | (\$10,530,000)        |
| Variable O&M                    | \$0                   | (\$880,000)           |
| Fuel or Charging Cost           | (\$23,470,000)        | (\$6,670,000)         |
|                                 | \$0                   | \$0                   |
| <b>Total Cost</b>               | <b>(\$71,740,000)</b> | <b>(\$43,410,000)</b> |
| Energy Revenue                  | \$40,750,000          | \$17,510,000          |
| Ancillary Revenue               | \$17,600,000          | \$7,640,000           |
| <b>Net Cost (2025)</b>          | <b>(\$13,400,000)</b> | <b>(\$18,270,000)</b> |
| <b>Total Net Benefit (2025)</b> | <b>\$4,870,000</b>    |                       |

### Scenario 2: 2025 Forward Prices without Carbon Price, 3% Capacity Factor

Table 25. Net cost comparison in Scenario 2, excluding capacity revenue.

| All in 2022\$ for year 2025     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$30,760,000)        | (\$25,320,000)        |
| Fixed O&M                       | (\$17,520,000)        | (\$10,530,000)        |
| Variable O&M                    | \$0                   | (\$900,000)           |
| Fuel or Charging Cost           | (\$26,120,000)        | (\$4,910,000)         |
|                                 | \$0                   | \$0                   |
| <b>Total Cost</b>               | <b>(\$74,400,000)</b> | <b>(\$41,660,000)</b> |
| Energy Revenue                  | \$40,540,000          | \$15,920,000          |
| Ancillary Revenue               | \$17,590,000          | \$7,510,000           |
| <b>Net Cost (2025)</b>          | <b>(\$16,270,000)</b> | <b>(\$18,230,000)</b> |
| <b>Total Net Benefit (2025)</b> | <b>\$1,960,000</b>    |                       |





**Scenario 3: 2021 Historical Prices without Carbon Price, 5% Capacity Factor**

**Table 26. Net cost comparison in Scenario 3, excluding capacity revenue.**

| All in 2022\$ for year 2025     | Battery Storage       | CT                    |
|---------------------------------|-----------------------|-----------------------|
| CapEx                           | (\$30,760,000)        | (\$25,320,000)        |
| Fixed O&M                       | (\$17,520,000)        | (\$10,530,000)        |
| Variable O&M                    | \$0                   | (\$1,510,000)         |
| Fuel or Charging Cost           | (\$23,470,000)        | (\$11,090,000)        |
|                                 | \$0                   | \$0                   |
| <b>Total Cost</b>               | <b>(\$71,740,000)</b> | <b>(\$48,450,000)</b> |
| Energy Revenue                  | \$40,750,000          | \$24,060,000          |
| Ancillary Revenue               | \$17,600,000          | \$7,330,000           |
| <b>Net Cost (2025)</b>          | <b>(\$13,400,000)</b> | <b>(\$17,070,000)</b> |
| <b>Total Net Benefit (2025)</b> | <b>\$3,660,000</b>    |                       |



**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor's Public's Exhibit No. 6 OUCC's Consumer Comments* has been served upon the following counsel of record in the captioned proceeding by electronic service on April 19, 2024.

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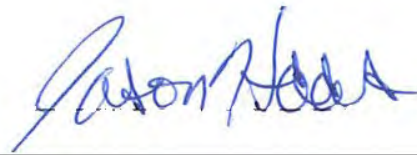
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