FILED April 28, 2021 INDIANA UTILITY REGULATORY COMMISSION

PETITIONER'S EXHIBIT 2

IURC CAUSE NO. 44720 TDSIC-9 DIRECT TESTIMONY OF MARTIN D. DICKEY FILED APRIL 28, 2021

DIRECT TESTIMONY OF MARTIN D. DICKEY VICE PRESIDENT, TRANSMISSION CONSTRUCTION & MAINTENANCE DUKE ENERGY BUSINESS SERVICES LLC ON BEHALF OF DUKE ENERGY INDIANA, LLC CAUSE NO. 44720 TDSIC-9 BEFORE THE INDIANA UTILITY REGULATORY COMMISSION

1		I. <u>INTRODUCTION</u>
2	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
3	A.	My name is Martin D. Dickey, and my business address is 1000 East Main Street,
4		Plainfield, Indiana 46168.
5	Q.	BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
6	A.	I am employed as Vice President, Transmission Construction & Maintenance by
7		Duke Energy Business Services LLC, a service company subsidiary of Duke
8		Energy Corporation, and a non-utility affiliate of Duke Energy Indiana, LLC
9		("Duke Energy Indiana" or "Company").
10	Q.	WHAT ARE YOUR DUTIES AND RESPONSIBILITIES AS VICE
11		PRESIDENT TRANSMISSION CONSTRUCTION & MAINTENANCE?
12	A.	As Vice President for Transmission Construction & Maintenance, I am
13		responsible for leading a team of Construction and Maintenance Managers,
14		Supervisors, and technical craft employees to achieve company objectives. I
15		facilitate and direct activities that supported customers and communities to
16		provide a safe and efficient high voltage electric system and support a productive
17		and motivated team of employees. There are approximately 400 employees
18		assigned to the Midwest Transmission Construction and Maintenance team and an

1		additional 200 contract support personnel. The Midwest Transmission
2		Construction & Maintenance organization maintains over 900 substations and
3		approximately 8,000 miles of transmission lines in the states of Kentucky, Ohio,
4		and Indiana. The team is also responsible for the construction of future substation
5		and transmission line assets and upgrades. I am responsible for meeting financial
6		and operational performance objectives for the Midwest Transmission
7		organization and had significant day-to-day decision-making authority for
8		transmission operations. I am also responsible for compliance with all applicable
9		state, federal and company requirements related to the Midwest transmission
10		system. This includes, but is not limited to, Federal Energy Regulatory ("FERC")
11		and North American Electric Reliability Corporation ("NERC") applicable
12		standards.
13	Q.	PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND
14		PROFESSIONAL BACKGROUND.
15	A.	I have been employed with Duke Energy and its predecessor companies for 34
16		years. I have held progressive levels of responsibility and experience beginning in
17		the craft series and progressing through Technical Services, Substation Construction
18		& Maintenance supervision, Transmission Line Maintenance and Construction
19		supervision and management, Substation Services supervision and management,
20		Transmission Construction & Maintenance Area Manager responsibilities,
21		Transmission Construction & Maintenance General Manager for the Midwest

IURC CAUSE NO. 44720 TDSIC-9 DIRECT TESTIMONY OF MARTIN D. DICKEY FILED APRIL 28, 2021

1		Transmission Construction & Maintenance for the Midwest covering Indiana, Ohio,
2		& Kentucky. I have a 2-year degree in Electronics Technology and a Bachelor of
3		Science Degree in Business Administration.
4	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
5		PROCEEDING?
6	A.	My testimony will summarize the completed Transmission Line, Transmission
7		Substation and Distribution Substation projects through December 31, 2020. This
8		will include an update on our in-service costs versus the cost estimates we
9		provided in the TDSIC-8 proceedings.
10		II. OVERVIEW OF TRANSMISSION UPDATE
11	Q.	DO YOU HAVE ANY GENERAL CONCLUSIONS REGARDING THE
11 12	Q.	DO YOU HAVE ANY GENERAL CONCLUSIONS REGARDING THE T&D PLAN?
	Q. A.	
12		T&D PLAN?
12 13		T&D PLAN? Yes. Generally, the Transmission Line, Transmission Substation and Distribution
12 13 14		T&D PLAN? Yes. Generally, the Transmission Line, Transmission Substation and Distribution Substation portions of the T&D Plan, which are the portions of the T&D Plan for
12 13 14 15		T&D PLAN? Yes. Generally, the Transmission Line, Transmission Substation and Distribution Substation portions of the T&D Plan, which are the portions of the T&D Plan for which I have management oversight responsibility, are being executed within the
12 13 14 15 16		T&D PLAN? Yes. Generally, the Transmission Line, Transmission Substation and Distribution Substation portions of the T&D Plan, which are the portions of the T&D Plan for which I have management oversight responsibility, are being executed within the scope and schedule identified in Cause No. 44720 and as updated in our semi-
12 13 14 15 16		T&D PLAN? Yes. Generally, the Transmission Line, Transmission Substation and Distribution Substation portions of the T&D Plan, which are the portions of the T&D Plan for which I have management oversight responsibility, are being executed within the scope and schedule identified in Cause No. 44720 and as updated in our semi-annual rider proceedings. Further, although there are some variances in the cost
12 13 14 15 16 17		T&D PLAN? Yes. Generally, the Transmission Line, Transmission Substation and Distribution Substation portions of the T&D Plan, which are the portions of the T&D Plan for which I have management oversight responsibility, are being executed within the scope and schedule identified in Cause No. 44720 and as updated in our semi-annual rider proceedings. Further, although there are some variances in the cost estimates for individual projects, we continue to trend very closely with our

1	Q.	HAS DUKE ENERGY INDIANA COMPLETED THE WORK THROUGH
2		DECEMBER 31, 2020 AS DESCRIBED IN ITS CASE-IN-CHIEF IN
3		CAUSE NO. 44720 AND MOST RECENTLY UPDATED IN TDSIC-8?
4	A.	Yes. For Distribution Substation charges, 34 completed projects included
5		Distribution Substation charges totaling \$41,861,022, which is 5% less than the
6		project estimates of \$43,883,867. 56 completed projects included Transmission
7		Line charges totaling \$25,252,047, which is 2% more than the cost estimates of
8		\$24,641,398. 28 completed projects included Transmission Substation charges
9		totaling \$33,090,401, which is 3% less than the cost estimates of \$34,210,611.
10		Overall, Duke Energy Indiana placed 118 projects in-service with an actual cost
11		of \$100,203,469 which is 2% less than the estimated value of \$102,735,876, prior
12		to the application of contingency. Please refer to Petitioner's Exhibit 1-A (CMH).
13	Q.	WILL THERE BE CHARGES FOR PROJECTS THAT WENT INTO
14		SERVICE IN 2020 THAT ARE RECEIVED AFTER THE DECEMBER 31,
15		2020 CUTOFF DATE?
16	A.	Yes. Since some of these projects were placed in-service near the end of 2020,
17		some charges were received after the December 31, 2020 date. These will be
18		requested to be recovered in the planned TDSIC-11 cost recovery filing scheduled
19		for the Spring of 2022.
20	Q.	WERE THERE ANY 2020 TRANSMISSION LINE, TRANSMISSION
21		SUBSTATION, OR DISTRIBUTION SUBSTATION PROJECTS THAT
22		DID NOT GO INTO SERVICE IN 2020 AS PLANNED?

IURC CAUSE NO. 44720 TDSIC-9 DIRECT TESTIMONY OF MARTIN D. DICKEY FILED APRIL 28, 2021

1	A.	Yes. Due to outage constraints, delayed component delivery, and national storm
2		response, a total of 19 projects had portions of or the entirety of a project not go
3		into service as planned by December 31, 2020. These projects are now to be
4		completed in 2021 or 2022. Nonetheless, the plan has been effective as the T&D
5		combined plans are near the established cap level through the first five years of
6		the TDSIC plan. Transmission Business is 3% ahead of the original plan through
7		2020. The forecasted value of these projects is \$6 million, or 6% of the overall
8		2020 Transmission project plan. Please see Petitioner's Confidential Workpaper
9		2-MDD.
10	Q.	WHAT ARE DUKE ENERGY INDIANA'S PLANS FOR COMPLETING
11		2020 PROJECTS THAT WERE CARRIED OVER INTO 2021 AND 2022?
12	A.	Projects have been integrated into the 2021 or 2022 outage schedule with plans to
13		place them in-service prior to December 31, 2022. There are five exceptions for
14		projects that have been cancelled, totaling \$700,000. See details in Workpaper 2-
15		MDD.
16	Q.	DOES DUKE ENERGY INDIANA REMAIN ON TARGET TO PERFORM
17		THE WORK IDENTIFIED IN ITS T&D PLAN AS UPDATED IN CAUSE
18		NO. 44720 TDSIC-8?
19	A.	Yes. Duke Energy Indiana remains on target to perform the T&D Plan as most
20		recently summarized in Cause No. 44720 TDSIC-8.
21	Q.	WERE ANY PROJECTS MOVED INTO THE T&D PLAN DURING 2020?
22	A.	No.

1		III. <u>UPDATED COST ESTIMATES FOR 2020 IN-SERVICE PROJECTS</u>
2	Q.	HAS DUKE ENERGY INDIANA PROVIDED IN-SERVICE COSTS FOR
3		THE PROJECTS PLACED INTO SERVICE BY DECEMBER 31, 2020?
4	A.	Yes. Duke Energy Indiana's costs for projects placed into service by
5		December 31, 2020 have been provided in Petitioner's Exhibits 2-A (MDD) and
6		Confidential Exhibit 2-B (MDD).
7	Q.	WERE THERE ANY 2020 IN-SERVICE TRANSMISSION LINE, AND
8		T&D SUBSTATION PROJECTS THAT REQUIRED CONTINGENCY
9		AND UNDER-RUN TO BRING THEIR VARIANCES WITHIN 20%?
10	A	Yes. There are four projects that required the application of contingency and
11		under-run in order to bring the variance of a portion of a project to approximately
12		20% more than the estimated cost. This evaluation of project variance was done
13		within a portion of an overall project, sub-divided by FERC and by Substation or
14		Line. The projects include:
15		• Greendale 138kV Grnd Sw Rpl Bk 1-2 AMIN1212
16		• Lapel Jct Sw Rpl AMIN1189
17		 Allendale Rlbty Upg TDSIC TIN2075
18		 Oden Rlbty Upg TDSIC TIN2095
19		A summary of each project and variance explanations have been provided in
20		Petitioner's Confidential Exhibit 2-B (MDD).

1	Q.	PLEASE EXPLAIN THE VARIANCE IN OPERATIONS AND
2		MAINTENANCE ("O&M") EXPENSE FOR THE T&D SUBSTATIONS
3		AND TRANSMISSION LINE PROJECTS.
4	Α.	In our most recent T&D Plan update, we estimated \$1,175,222 in O&M expense
5		for T&D Substation and Transmission Line projects in 2020. Our actuals for
6		2020 were \$914,939, 22% under the estimated value. See Petitioner's Exhibit
7		1-A (CMH).
8	Q.	DO THE BENEFITS OF THE PROPOSED TRANSMISSION PROJECTS
9		CONTINUE TO EXCEED THEIR COSTS?
10	A.	Yes. As discussed more fully below, the T&D Plan remains on target to be
11		completed as set forth in the Settlement Agreement in Cause No. 44720 and as
12		updated in TDSIC-8. The costs of the plan have not materially changed, and the
13		benefits remain the same as they were described in Cause No. 44720. Because we
14		are completing essentially the same scope of work anticipated by our earlier Risk
15		Analysis provided in Cause No. 44720, the benefits of that risk reduction hold
16		true for the actual work performed to date. Ms. Hart included an updated Risk
17		Analysis in her testimony in TDSIC-8, which demonstrates that we are on track.
18	Q.	DO YOU BELIEVE THESE PROJECTS ARE STILL IN THE PUBLIC
19		INTEREST?
20	A.	Yes. We are extremely happy with our performance during the first five years of
21		the T&D Plan. We have performed the scope as outlined in Cause No. 44720,
22		and our forecast at this point has us staying close to the capital cost caps set forth

1		in the Settlement Agreement we entered into in Cause No. 44720. The total plan
2		is tracking on target for all seven years, and these projects benefit Indiana
3		customers.
4	Q.	ARE THE WORK ORDERS FOR EACH IN-SERVICE PROJECT
5		AVAILABLE FOR DISCOVERY?
6	A.	Yes. Individual work orders are available for discovery.
7	IV	. DUKE ENERGY INDIANA HAS MET STATUTORY REQUIREMENTS
8	Q.	HAS DUKE ENERGY INDIANA PROVIDED THE BEST ESTIMATE OF
9		THE COSTS OF THE ELIGIBLE TRANSMISSION IMPROVEMENTS?
10	A.	Yes. Cost estimates have been generated for all T&D Substation and
11		Transmission Line projects included in the T&D Plan. No budgetary estimates
12		were utilized in creating this T&D Plan. Further, in Cause No. 44720, Black &
13		Veatch validated Duke Energy Indiana's estimates and confirmed that they are the
14		best estimate of the costs of the eligible improvements.
15	Q.	DOES PUBLIC CONVENIENCE AND NECESSITY REQUIRE EACH
16		COMPONENT OF THE T&D PLAN?
17	A.	Yes. The T&D Plan supports a significant reduction of operational risk through
18		replacement of aging infrastructure. Additionally, the T&D Plan improves the
19		operational efficiency of Duke Energy Indiana's transmission and distribution
20		system. Finally, the T&D Plan addresses and improves upon the overall customer
21		experience and will enable a number of customer benefits and programs in this
22		filing and in future years.

1	Q.	DO THE ESTIMATED COSTS OF THE T&D PLAN JUSTIFY THE
2		INCREMENTAL BENEFITS OF THE PLAN?
3	A.	Yes. The transmission reliability and integrity projects included in the T&D Plan
4		are justified based on the overall system risk reduction model created by Black &
5		Veatch. As detailed in Ms. Hart's TDSIC-8 testimony, the risk model was
6		updated to reflect assets that have gone into service through the first five years of
7		the TDSIC plan as well as updating actual and estimated cost and project timing
8		reflected in the TDSIC-8 filing. By executing the T&D Plan, the system risk
9		profile of the transmission and distribution system can be reduced by
10		approximately 30% versus not implementing the T&D Plan. All of this combined
11		demonstrates that the projects and programs included in the T&D Plan are
12		reasonable, necessary, and justified by providing increased reliability and
13		modernization benefits to all Duke Energy Indiana customers.
14		V. <u>CONCLUSION</u>
15	Q.	WERE PETITIONER'S EXHIBIT 2-A (MDD) AND CONFIDENTIAL
16		EXHIBIT 2-B (MDD) PREPARED BY YOU OR AT YOUR DIRECTION?
17	A.	Yes, they were.
18	Q.	DOES THIS CONCLUDE YOUR PREFILED TESTIMONY?
19	A.	Yes, it does.

			Сар	ital				08	M	
Project Category	Service	Plan (In-Service	Contingency and Under-Run	and Under-Run	Actual vs. Fined TDSIC-5 Plan Variance		Cumulative In- Service Investments through 2020	Cumulative Filed TDSIC-8 Plan (related to In-Service Investments) ¹	Actual vs. Filed TDSIC-8 Plan Variance	% Variance
	tiirougii 2020	investinents)	Аррпеи	Applied	variance	% variance	tiliougii 2020	investinents)	Variance	% Variance
Distribution										
Distribution System Substation Improvements ³	161,855,234	164,070,366	0.00	164,070,366	2,215,131	1%	74,719	99,479	24,760	25%
Transmission										
Transmission System Line Improvements	218,424,914	217,698,524	13,576.52	217,712,100	-712,813	0%	10,809,736	11,083,568	273,832	2%
Transmission System Substation Improvements	133,178,466	134,283,415	0.00	134,283,415	1,104,949	1%	446,126	447,503	1,377	0%
Grand Total	513,458,614	516,052,305	13,576.52	516,065,881	2,607,268	1%	11,330,581	11,630,549	299,968	3%

^{1.} Only includes projects from TDSIC-8 Plan that did go into service in 2020 and excludes Contingency.

^{2.} Contingency and Under-Run applied to capital Actuals exceeding the Filed TDSIC-8 Plan by more than 20%; application of Contingency and Under-Run bring variance to 20%. Contingency and Under-Run applied at the Filing Project level.

						Capital								O&M			
			Actuals			Capitai	Estimate		Var	iance		Actuals		Estimate	te Variance		
								Filed TDSIC-8						Filed			
						Filed TDSIC-8	Contingency and Under-	Plan with			n.: n :		T-1-1 D11	TDSIC-8 Plan (related to In-	Astroday Plant		
			Prior Project	Total TDSIC 9	Total Project	(In-Service	Run	Contingency and Under-Run	Actual vs. Filed Plan		Prior Project Recovery	Total TDSIC 9	Total Project	Service	Actual vs. Filed TDSIC-8 Plan		
Project Category	Funding Project	Funding Project Desc	Recovery Value			Investments) ²	Applied ³	Applied	Variance	% Variance	Value	Recovery ¹	Value	Investments) ¹	Variance	% Variance	Comments
Distribution System Substation Improvements	AMIN1207	Azalia Wd Sub Struct Rbld VCR Repl			0				0	0%		0			0	0%	
	AMIN1224	Harodsbg_13834 Tranruptr TDSIC			0				0	0%		0 0		0	0		
	AMIN1229 AMIN1230	Hanover 138kV Transrupter Rpl TDSIC New Alb Cent_138kV Transrupter Rpl			0				0	0%		0			0		
	AMIN1230 AMIN1241	Grncas Cem Rd 1201 Disc Rpl TDSIC			0				0	0% 0%) 0		0	0		
	AMIN1242	Kok Delco_Transrupter Rpl			0				0	0%		0 0		0	0		
	ESODEIFUN	ESO Control Center Facilities -IND.			0				0	0%		0		0	0		
	TIN1542	BLM Rogers St XTR CB Rpl TDSIC							0	0%		0		0	0		
	SGIDASUBF SGIIVVCSF	North Madison DA TDSIC IN Kokomo SE IVVC TDSIC							0	0% 0%		n		0	0	0%	
	AMIN1440	Kokomo Apperson New Sub TDSIC							0	0%) 0	-	0	0		
	AMIN1193	Whitfield 34.5kV CB-Rel Repl TDSIC							0	0%	1	0		0	0		
	TIN1742	Greencastle Ind Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1476	Kok Chrys So Upg Sub TDSIC							0	0%		0		0	0		
-	AMIN1290 TIN1458	Fairview 138 CB_Rel Rpl TDSIC Paragon Repl Fdn TDSIC			U				0	0% 0%		0	-	0	0		
	AMIN1298	Shbyv Southwest Rel Repl TDSIC							0	0%		0		0	0		
	TIN1046	BLM Dunn St 69kv Bus Upg								0%		0		0	0		
	TIN1733	Martinsvl East Ribty Upg TDSIC							0	0%		0		0	0		
	AMIN1257	Fountain City Rpl Trf Sw TDSIC							0	0%		0 0	C	0	0		
	TIN1750	Plainfld South Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1734 TIN1475	Spencer 69KV RIbty Upg TDSIC Loganspt Coplay 69kV Upg TDSIC							0	0% 0%		0		0	0		
	TIN1469	Bedford345 XTR CB Rel Rpl TDSIC							0	0%		0		0	0		
	TIN1751	Rossville Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1732	Jeffl KY Ave Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1544	Oakland City CB Rel Repl TDSIC								0%		0		0	0		
	TIN1814 TIN1800	Sellersburg Rlbty Upg TDSIC Arcadia Rlbty Upg TDSIC							0	0%		0		0	0		
	TIN1800 TIN1825	Bicknell Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1813	Plainfield 69 Rlbty Upg TDSIC							0	0%		0		0	0		
	TIN1811	New Palestine Rlbty Upg TDSIC							0	0%		0		0	0		
	TIN1744	Jeffvl Potter Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1752 TIN1746	Sullivan Ribty Upg TDSIC							0	0% 0%		0			0	0%	
	TIN1746 TIN1831	Mitchell 69kV RIbty Upg TDSIC Connersvl30thST RIbty Upg TDSIC							0	0%		0		0	0		
	AMIN1231	Mad-MichRd Bk1 Trnrup Rpl TDSIC							0	0%		0		0	0		
	TIN1835	Laf south Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1804	Grnwd ValleVsta Ribty Upg TDSIC								-2%		0		0	0		
	TIN1841	TH S Vigo Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1736 TIN2085	TH Honey Crk Ribty Upg TDSIC W Laf Cumberind Ribty Upg TDSIC							0	0% 0%		0		0	0		
	AMIN1292	Kokm Hi Pk 69kV CB_Rel Rpl TDSIC							0	0%		0		0	0		
	TIN1512	Bedford 25TH_Gnd Swi Rpl TDSIC								0%		0		0	0		
	TIN1472	Clark Maritime XTR 1 Repl TDSIC							0	0%		0		0	0		
	TIN1749	Petersburg Ribty Upg TDSIC								0%		0		0	0		
	TIN1468 TIN1735	Staunton Sub Rbld TDSIC TH 6th St Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1735	Columbus E25th Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1477	Loogootee Wd Struc Rbld TDSIC							0	0%		0		0	0		
	TIN1812	N Manchester Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1837	Milan Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1827	Brazil East Ribty Upg TDSIC							0	0%		0		0	0		
	AMIN1214 TIN1540	Flat Rock_5000kV XTR Repl TDSIC Bethlehem Xtr 1 Repl TDSIC					-		0	0% 0%		0	1	0	0		
	TIN1540 TIN2123	Carthage Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1759	Middletown Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1809	Nashville Ribty Upg TDSIC								-2%		0		0	0		
	TIN1826	Bloomfield RIbty Upg TDSIC			0				0	0%		0		0	0		
	TIN1810	New Goshen Ribty Upg TDSIC							0	0%		0		0	0		
<u> </u>	TIN1747 TIN1836	N Terre Haute Ribty Upg TDSIC Madison-Mich Rd Ribty Upg TDSIC			0		-		0	0% 4%		0	1	0	0		
	LUINTOOD	I IVI a UISUTI-IVIICII KU KIDLY UDG I DSIC			U						•	. 0	1	. 0	. 0		
	TIN1801	Batesvl Hilbrnd Ribty Upg TDSIC							n	0%	1	n		n	0		

			Actuals			Capital	Estimate		1 1/2	-1		Actuals		O&M Variance			
				Actuals			Estimate	Filed TDSIC-8	va	riance		Actuals		Filed	vari	lance	
						Filed TDSIC-8	Contingency	Plan with					l i	TDSIC-8 Plan	4		
						Plan	and Under-	Contingency	Actual vs.		Prior Project		Total Project	(related to In-	Actual vs. Filed		
			Prior Project	Total TDSIC 9	Total Project	(In-Service	Run	and Under-Run	Filed Plan		Recovery	Total TDSIC 9	Recovery	Service	TDSIC-8 Plan		
Project Category	Funding Project	Funding Project Desc	Recovery Value	Recovery ¹	Recovery Value	Investments) ²	Applied ³	Applied	Variance	% Variance		Recovery ¹	Value	Investments)1	Variance	% Variance	Comments
-,		TH 13th St Ribty Upg TDSIC							0	0%		0		С	0)	
	TIN1808	Laf Cinn Ribty Upg TDSIC							0	0%		0		C	J C)	
	TIN1840	Seymour Ribty Upg TDSIC								-4%		0		0) 0)	
	TIN1832	Franklin 230kV RIbty Upg TDSIC								5%		0		0	J 0		
	TIN1803	Brownstown Ribty Upg TDSIC							0	0%		0		0	0 0)	
	AMIN1335	Greenwood West_RTU Rpl TDSIC		_					0	0%		0		0	0 ()	
	TIN1833	Greenwood North Ribty Upg TDSIC								14%		0	<u> </u>	0	0 ()	
	TIN1738	BLM Northwest Ribty Upg TDSIC								-1%		0	<u> </u>	0	0 ()	
	TIN1806	Hanover Ribty Upg TDSIC								1%		0		0) 0)	
	TIN1708	6930 Midway Swi Rpl TDSIC								27%						92%	variance less than
	TIN1818	TH 25th St Ribty Upg TDSIC							0	0%		0	↓	0	0)	
	TIN1777	Westfield Rlbty Upg TDSIC							0	0%		0	↓	0	0)	
	TIN1828	Carmel 146th St Ribty Upg TDSIC							0	0%		0	↓	0	0)	
	TIN1743	Jeffvl 138 Ribty Upg TDSIC								1%		0		0	0	0	
	TIN1823 TIN1830	West Lafayette Ribty Upg TDSIC Charlestown Ribty Upg TDSIC								0% 2%					0	0%	
												0	 	- 0	1 0)	
	TIN1802 TIN2093	Brazil Ribty Upg TDSIC	 							1%	!	0	₽	<u> </u>	0 0	}	
		BLM Dillman Rd RIbty Upg TDSIC										0	├ ──	0	· ·		
	TIN2113 TIN1819	Brkvl LittleCdr Rlbty Upg TDSIC TH Spruce Rlbty Upg TDSIC	 							-2% 0%	-	0	+	+ 0	0 0	<u> </u>	
	TIN2063		1					-		0%		0	-	- 0	0		
	TIN2063	Wilmington Rel Rpl TDSIC TH Margaret Ave Ribty Upg TDSIC								0%		0	 	- 0	0 0	, <u> </u>	
	TIN2076	BLM Meadow Park Ribty Upg TDSIC	1					-		-1%		0	-	- 0	0 0		
	TIN2089	Russiaville Ribty Upg TDSIC								2%		0	 	- 0	o C	1	
	TIN2067	Seymour Airport Ribty Upg TDSIC								2%		0	 		o c	1	
	TIN2087	Fishers Ribty Upg TDSIC								19%		0	 	- 	o C	1	
	TIN2073	Cayuga 69kV Ribty Upg TDSIC	1							6%		0			0 0		
	TIN1807	Kok Toby Pike Ribty Upg TDSIC								3%		0			0 0)	
																	Labor decrease of proportional amount of reduction in indirects of . Due to work schedule optimization not all estimated internal labor hours were needed to complete the work causing a reduction in the
	TIN2082 TIN2077	Delphi Wells St Rel Rpl TDSIC								24% -1%		0	├ ──	0	1 0)	overall labor costs and associated Indirects.
	TIN2077	Grncas CemRd Ribty Upg TDSIC - TIN2 Columbus South Ribty Upg TDSIC - TI	-							-1%		0	├	- 0	, U	1	
	TIN2112	Spiceland Ribty Upg TDSIC - 11								-5%		0		0	, <u> </u>	,	
	TIN2084	Thorntown Ribty Upg TDSIC - TIN2084								2%		0	 	- C	0 0	1	
	M180062	Connersvil 12th RlbtyUpgTDSIC								4%		0	 	- 	0 0	4	
	M180197	Carmel Southeast Ribty Upg TDSIC	1							7%		0			0 0		
	TIN1805	Hagerstown Ribty Upg TDSIC								-1%		0		- 0	0 0	1	
	TIN1834	Laf Concord Ribty Upg TDSIC	1							-3%		0			0 0	·	
		N Vernon West Ribty Upg TDSIC - TIN								-1%		0		<u> </u>	0 0)	
	TIN2075	Allendale Ribty Upg TDSIC - TIN2075								49%				,	0		Error in transcribing the AFUDC estimate in the TDSIC-8 filing. The estimate entered was The AFUDC value intended to be entered was The AFUDC was This is the cause of the overestimation of the project.
	TIN2078	Whitesville Ribty Upg TDSIC								-20%		0					Overage was due to n material and in indirect Telecom costs were estimated for a standard scenario. A site conditions were realized it was found that Insight hamore work needed, therefore an additional in materials.
	TIN2078	Odon Ribty Upg TDSIC - TIN2095	t							1%	1	0	\vdash	1 0	a l c	 	maseriala.
	TIN1839	Princeton Ribty Upg TDSIC								7%		0	 	- 	o C	1	
Distribution System Substation Improvements Total	41033	Transector Moty Opg Toole	115,650 315	5 46.204 91	9 161,855,234	164.070 366	0	164,070,366	2.215.131		54,231	20,488	74,719	99,479	9 24,760	25%	
Transmission System Line Improvements	AMIN0705	6935 IN Rebuild Pt 2 TDSIC	110,000,010	10,204,31	101,000,20	201,070,000		204,070,000	1,213,131	0%		20,400	,,,15	33,473	2-,700	0%	
	AMIN1207	Azalia Wd Sub Struct Rbld VCR Repl			0				n	0%		0			, c	0%	
	AMIN1244	Lincoln WVPA Rpl 69 Sws-Fuse TDSIC			0				0	0%		0		C	0 0		
	AMIN1279T	6951 Edwprt HE RgrsJct Rbld TDSIC							0	0%		0		تسمع	0	·	
	AMIN0706	6936 IN Rbid Pt 2 TDSIC			0				0	0%		0			0	0%	
	AMIN1148	34521 IM Dead Strucs TDSIC							0	0%		0			0	0%	
	ESODEIFUN	ESO Control Center Facilities -IND.			0				0	0%		0		0	0 0)	
					0				0	0% 0%		0		С	0 0	·	

			Capital														
				Actuals		Capitai	Estimate		Var	iance		Actuals		O&M Estimate	Varia	ance	
								Filed TDSIC-8						Filed			
						Filed TDSIC-8	Contingency							TDSIC-8 Plan			
						Plan	and Under-	Contingency	Actual vs.		Prior Project		Total Project	(related to In-	Actual vs. Filed		
			Prior Project	Total TDSIC 9	Total Project	(In-Service	Run	and Under-Run			Recovery	Total TDSIC 9		Service	TDSIC-8 Plan		
Project Category		Funding Project Desc	Recovery Value	Recovery ¹	Recovery Value	Investments) ²	Applied ³	Applied	Variance		Value	Recovery ¹	Value	Investments)1	Variance	% Variance	Comments
		BLM Rogers St XTR CB Rpl TDSIC		(0				0	0%		0 0	C	0	0		
		6929 Static Repl TDSIC							0	0%		0			0	0%	
	AMIN1440 TIN1532	Kokomo Apperson New Sub TDSIC 69154 Crwdvl_ChryGrv Stac TDSIC			U				0	0%		0			0	0%	
	TIN1532 TIN1538	34540 IM Dead TDSIC							0	0%	4	0			0	0%	
		34528 IM Dead End TDSIC							0	0%		0	•		0	0%	
		69174 Shrpsvl Kok SE Rbld TDSIC							0	0%					0	0%	
	TIN1529	69174 Shrpsvl_Wndfl Rbld TDSIC							0	0%		0			0	0%	
		6952 Medora Browntwn Rbld TDSIC							0	0%		0			0	0%	
		69180 Prtl Rbld Tipton-823-2016			_				0	0%						0%	
		Fairview 138 CB_Rel Rpl TDSIC			0				0	0%		0			0	0%	
		69134 Rbld Adv_Dover REMC TDSIC							0	0%		0			0	0%	
	TIN1046 TIN1734	BLM Dunn St 69kv Bus Upg							0	0%		0			0	0%	
		Spencer 69KV Ribty Upg TDSIC 6933 Rbid Pt1 Gcst N-Mrtn TDSIC			0				0	0%		0	C		0	0%	
	TIN1/10	Loganspt Coplay 69kV Upg TDSIC							0	0%		0		, 0	, U	0%	
		34531 IM Dead Strucs TDSIC							0	0%		0			0	0%	
		6988 MdFrk_DeerCrJct Rbld TDSIC								0%		0			0	0%	
	AMIN1278	69153_NewPekin-Salem Rbld TDSIC							0	0%	6					0%	
	TIN1861	69134 Rbld Jmstwn Mar Adv TDSIC							0	0%					0	0%	
	TIN1533	6975 LewCr_Flt Rck Rpl Pl TDSIC							0	0%					0	0%	
		Oakland City CB Rel Repl TDSIC							0	0%		0			0	0%	
		69140 Rbld HE Rysvl-Ktwn TDSIC							0	0%					0	0%	
		Lake Holiday Jct Sw Rpl Darlington_Swi Repl TDSIC							0	0%		0			0	0%	
		Jeffvl Potter Ribty Upg TDSIC							0	0%		0			0	0%	
		69166 Rbld Grnfld Ftntown TDSIC							0	0%		Ü			0	0%	
		6952 HE Leesville Swi Rpl TDSIC							0	0%		0			0	0%	
	TIN1841	TH S Vigo Ribty Upg TDSIC							0	0%	6	0 0		0	0		
		6919 Hillnbrnd Andersonvl TDSIC								0%					0	0%	
		Bedford 25TH_Gnd Swi Rpl TDSIC							0	0%					0	0%	
		Middletown Jct Rlbty Upg TDSIC		(0				0	0%		0			0	0%	
	TIN1729	Cov-Muni IMPA Ribty Upg TDSIC							0	0%		0			0	0%	
	TIN1468 AMIN1214	Staunton Sub Rbld TDSIC Flat Rock_5000kV XTR Repl TDSIC							0	0%		0 0			0	0%	
	TIN1546	Whitesville South Rel Rol TDSIC			<u>.</u>					0%		0 0		0	0		
		Ptrbg In Pk 6963 Add Swi TDSIC			0				0	0%		0		0	0	0%	
		Middletown Ribty Upg TDSIC							0	0%		0		0	0		
		Nashville Rlbty Upg TDSIC							0	0%	ó	0		0	0		
	TIN1536	34511 IM Dead TDSIC								0%	6	0			0	0%	
		6919 Pt2 Rbld Andvl_Andvl Jct								0%		0			0	0%	
		Danville CB Rel GndSw Rpl TDSIC							0	0%		0		0	0		
		6964 HE Wash Jct Swi Rpl TDSIC - TI							0	0%		0		0	0		
	TIN2090 TIN1534	Lapel Ribty Upg TDSIC 6975 Fit Rck Hope Pole Rpi TDSIC							0	0% -4%		0		0	0	11%	
	TIN1840	Seymour Ribty Upg TDSIC								-4%		0		0	0	1176	
		Lapel Jct Sw Rpl								-20%		0		0	0		variance less than
		Greenwood North Ribty Upg TDSIC								26%		0		0	0	İ	variance less than
		6930 Midway Swi Rpl TDSIC								3%		0				100%	variance less than
	TIN1828	Carmel 146th St Ribty Upg TDSIC								54%		0		0	0		variance less than
	TIN2115	Cambridge City Rlbty Upg TDSIC								-9%		0		0	0		<u> </u>
	TIN1802	Brazil Ribty Upg TDSIC								10%					0	0%	
		6920 Pt 3 Rbld Cnrsvl Glenwood cont	!							0%				_	0	0%	
		BLM Strong Rd Ribty Upg TDSIC BLM Dillman Rd Ribty Upg TDSIC	-							6% -6%		0		0	0	-	
		Brkvl LittleCdr Rlbty Upg TDSIC con	 							1%		0		0	0	l	
		69170 Pt1 Rbld McGrawsvil TDSIC								5%		1 0		0	0		
	TIN2067	Seymour Airport Ribty Upg TDSIC	1							3%		0		0	0		
	TIN2087	Fishers RIbty Upg TDSIC								6%		0		0	0		
	TIN2073	Cayuga 69kV Ribty Upg TDSIC								5%		0		0	0		
	TIN2082	Delphi Wells St Rel Rpl TDSIC	_							-5%						-3%	
	TIN2065	Columbus South Ribty Upg TDSIC - TI								-4%	6	0		0	0		
	TIN2084	Thorntown Ribty Upg TDSIC - TIN2084								12%	6	0		0	0		
	M180062	l	l							-19%	b	0				100%	variance less than

			Control Contro														
				Actuals		Capital	Estimate		Va	riance		Actuals		O&M Estimate	Variance		
			7.0000				Louinate	Filed TDSIC-8		- Indirect		, rectuuis		Filed	Variance		7
						Filed TDSIC-8	Contingency							TDSIC-8 Plan			
						Plan	and Under-	Contingency	Actual vs.		Prior Project		Total Project	(related to In-	Actual vs. Filed		
				Total TDSIC 9	Total Project	(In-Service	Run	and Under-Run	Filed Plan		Recovery	Total TDSIC 9		Service	TDSIC-8 Plan		
Project Category		Funding Project Desc	Recovery Value	Recovery	Recovery Value	Investments) ²	Applied ³	Applied	Variance		Value	Recovery ¹	Value	Investments) ¹	Variance	% Variance	Comments
	TIN1834 TIN2066	Laf Concord Ribty Upg TDSIC N Vernon West Ribty Upg TDSIC - TIN								21% 20%		0		0	0	100%	variance less than
	TIN2005	Allendale Ribty Upg TDSIC - TIN2075								-20%		0		0	0	100%	variance less than
	TIN2095	Odon Ribty Upg TDSIC - TIN2095								-20%		0		0	0	100%	variance less than
	M180321	Dudleytown Jct Instl RTU								40%		0			0		variance less than
	PRTIN-A	Various Lines - Project # PRTIN-A - GLT Pole Repl								0%						0%	
	PRTIN-B	Various Lines - Project # PRTIN-B - GLT Pole Repl							0	0%		0			0	0%	
	PRTIN-C	Various Lines - Project # PRTIN-C - GLT Pole Repl								0%					0	0%	
	PRTIN-D	Various Lines - Project # PRTIN-D - GLT Pole Repl								0%					0	0%	The estimate was
																	The estimate was per pole for T-FERC GLT O&M activities including vegetation of existing right of way and
																	asset transfer of transmission assets from existing wood t
																	new steel pole. Actual charges were per pole once
	PRTIN-E	Various Lines - Project # PRTIN-E - GLT Pole Repla	0							-5%							work was completed.
Transmission System Line Improvements Total			184,091,527	34,333,38	7 218,424,914	217,698,524	13,577	217,712,100	-712,813			1,202,164	10,809,736	11,083,568			
Transmission System Substation Improvements	AMIN1152 AMIN1211	Kok Hi Pk 230k CB_Rel Rpl TDSIC		- '	0				0	0%		0		0	0		
	AMIN1211 AMIN1215	Batesvl 345 138kV TrfSwi Rpl TDSIC Crane Metr Repl 69kV Pots TDSIC			0				0	0%		0		0	0	0,0	
	AMIN1215 AMIN1296	New Castle Rel Repl TDSIC			0				0	0%	(0	0		
	GLPRTFA	Pole Repl Gnd Line-T			0				0	43%	· ·	0		0	Ü		variance less than
	AMIN1300	Mitchell Lost River Rel Repl TDSIC			0				0	0%	(0		0	0		
	AMIN0464	Wabash River 138KV Gen Sta. Phase I		-	0				0	0%		0		0	0		
	AMIN1124	Greentown_765kV Spare XTR TDSIC		(0				0	0%	(0		0	0		
	AMIN1191 ESODEIFUN	Frankfort Westside Sw Rpl TDSIC			0				0	0%		0		0	0	0%	
	AMIN1236	ESO Control Center Facilities -IND. Spelterville SS Tap Swi Rpl TDSIC			0				0	0%		0		0	0	09/	
	TIN1473	Kok HaynesInt Rpl WdStruc TDSIC			0				0	0%		0		0	0	078	
	AMIN1110	Cayuga GenSta 345kV CBRepl TDSIC			0				0	0%		0				100%	removed from updated file
	AMIN0913	Cayuga CT Swyd REL MDAR Repl TDSIC			0				0	0%		0		0	0		
	TIN1406	Walton 69kV CB Repl TDSIC							0	0%		0		0	0		
	AMIN1440	Kokomo Apperson New Sub TDSIC							0	0%	(0	0	0	0		
	TIN1532	69154 Crwdvl ChryGrv Stac TDSIC			0			-	0	0%		0		0	0		
	TIN1756 AMIN1193	34528 IM Dead End TDSIC Whitfield 34.5kV CB-Rel Repl TDSIC			0				0	0%		0		0	0		
	AMIN1192	Seymour 138KV LTC Repl TDSIC			0				0	0%		0		0	0		
	TPEQUIPIN	Indiana Trans Equip Failure			0				0	0%		0			0	0%	
	TIN1529	69174 Shrpsvl_Wndfl Rbld TDSIC							0	0%		0		0	0		
	TIN1476	Kok Chrys So Upg Sub TDSIC							0	0%		0		0	0		
	AMIN1290	Fairview 138 CB_Rel Rpl TDSIC							0	0%		0			0		
	TIN1403 AMIN1298	LAF 69kV Rpl Rel - OCB TDSIC Shbyv Southwest Rel Repl TDSIC						-	0	0%		0		0	0	0,0	
	TIN1046	BLM Dunn St 69kv Bus Upg							0	0%		U		U	0		
	AMIN1330	Bean Blossom_RTU Rpl TDSIC							0	0%		0		0	0	070	
	TIN1750	Plainfld South Rlbty Upg TDSIC							0	0%		0		0	0		
	TIN1734	Spencer 69KV Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1475	Loganspt Coplay 69kV Upg TDSIC							0	0%		0		0	0		
	TIN1469	Bedford345_XTR CB Rel Rpl TDSIC								0%		0			0	0%	
	TIN1751 AMIN1055	Rossville Ribty Upg TDSIC			0			-	0	0%		0		0	0		
	AMIN0766	Noblesville - Tipton Reco TDSIC Gallagher P_C Relo TDSIC			U				0	0%		0		U	0	0%	
	TIN1732	Jeffl KY Ave Ribty Upg TDSIC							0	0%		0		0	0	070	
	TIN1544	Oakland City CB Rel Repl TDSIC							0	0%		0		0	0		
	TIN1814	Sellersburg Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1813	Plainfield 69 Rlbty Upg TDSIC							0	0%		0		0	0		
	TIN1811	New Palestine Ribty Upg TDSIC							0	0%		0		0	0		
	AMIN1040 TIN1752	Franklin Forsythe St MDAR Repl Sullivan Ribty Upg TDSIC							0	0%		0		0	0	-	
	AMIN1205	Gwynvill_GCB 34523-22 Rpl TDSIC							0	0%		0		0	0	l	
	TIN1389	Gwynneville LTC Repl							0	0%		0		0	0	1	
-	TIN1835	Laf south Ribty Upg TDSIC							0	0%		0		0	0	İ	
	TIN1804	Grnwd ValleVsta Ribty Upg TDSIC							0	0%		0		0	0		
	TIN1841	TH S Vigo RIbty Upg TDSIC							0	0%		0		0	0		-
	AMIN1292	Kokm Hi Pk 69kV CB Rel Rpl TDSIC							0	0%		0		0	0		
	TIN1745	Middletown Jct Rlbty Upg TDSIC			0				0	0%		0		. 0	. 0		

						Capital											
				Estimate Variance						Actuals		O&M Estimate	Variance		1		
Project Category	Funding Project	Funding Project Desc	Prior Project Recovery Value	Total TDSIC 9	Total Project	Filed TDSIC-8 Plan (In-Service Investments) ²	Contingency and Under- Run Applied ³	Filed TDSIC-8 Plan with Contingency and Under-Run Applied	Actual vs. Filed Plan Variance	% Variance	Prior Project Recovery Value	Total TDSIC 9	Total Project Recovery Value	Filed TDSIC-8 Plan (related to In- Service Investments) ¹	Actual vs. Filed TDSIC-8 Plan Variance	% Variance	Comments
Froject Category	TIN1749	Petersburg Ribty Upg TDSIC	Recovery value	Recovery	Recovery value	e investments)	Applied	Applieu	variance	n n%	value	Recovery	value	investments)	n variance	70 Variance	Comments
	TIN1749	Columbus E25th Ribty Upg TDSIC							-	0%	,	+ ;	,		0	,	+
	TIN1728	N Manchester Ribty Upg TDSIC							-	0%	,	+ ;	,		0	,	+
	AMIN1214	Flat Rock 5000kV XTR Repl TDSIC								0%	,	-			2		+
									(0%	,	-	,	-	0	,	+
	AMIN1206	Gwynvill GCB 345B1-15 TDSIC									,	-)	-	0)	
	AMIN1151	Laf 230_Rpl 138 OCBRelay TDSIC								0%	b .)		0)	
	AMIN1741	Gallagher Gen Ribty Upg TDSIC								0%	b))	
	AMIN1233	NA_138kV Sub Svc Upg TDISC			0				(0%	6	()	(0 ()	
	TIN1826	Bloomfield Rlbty Upg TDSIC			0				(0%	6	(0		(0	6
	TIN1836	Madison-Mich Rd Rlbty Upg TDSIC			0				(0%	ó	()	() ()	
	TIN1801	Batesvl Hilbrnd Rlbty Upg TDSIC								0%	6	()	(0)	
	AMIN0744	TINFive Points Sta Upgr Ph I TDSIC								0%	6	()	(0)	
	TIN1534	6975 Flt Rck_Hope_Pole Rpl TDSIC							(0%	6	()	() ()	
	TIN1840	Seymour Ribty Upg TDSIC								7%	6	()	() ()	
	TIN1803	Brownstown Ribty Upg TDSIC							(0%	6	()	(0)	
	AMIN1335	Greenwood West_RTU Rpl TDSIC								0%	ó	()	(0 ()	
	TIN1833	Greenwood North Ribty Upg TDSIC								15%	6	()	(0 ()	
	TIN1777	Westfield Rlbty Upg TDSIC							(0%	ó	()	() ()	
	AMIN1408	Jeffvl 138 CB Rel Repl TDSIC							(0%	6	()	() ()	
	TIN1823	West Lafayette Ribty Upg TDSIC								6%	6	()) ()	1
	TIN1802	Brazil Ribty Upg TDSIC								0%	ń	()) ()	1
	TIN2063	Wilmington Rel Rpl TDSIC								-1%	6)		n ()	1
	TIN2076	TH Margaret Ave Ribty Upg TDSIC								0%	6		1		1	1	-
	TIN2092	BLM 230 Rel Rpl TDSIC								-1%	6		1		1	1	-
	TIN2089	Russiaville Ribty Upg TDSIC								2%	4	1	1	1	1	1	
	TIN2067	Seymour Airport Ribty Upg TDSIC								2%		1)	· ;) ')	+
	TIN1807	Kok Toby Pike Ribty Upg TDSIC	1							27%	()		2)	variance less than
	AMIN1391	Clarksville LTC Repl TDSIC	1							21%	,		,		2	,	variance less than
	TIN2082		-							7%	,			-	0	,	Variance less trial
	TIN2082	Delphi Wells St Rel Rpl TDSIC								1%	,	-)	-	0)	
		Columbus South Ribty Upg TDSIC - TI									,	-)	-	0)	
	TIN2112	Spiceland Ribty Upg TDSIC								-6%		-					
	AMIN1291	NC 138kV CB Rel Repl TDSIC								-4%	b .)		0)	
	AMIN1297	Pittsboro Rel Repl TDSIC								-7%	6	()	(0 ()	
																	Labor decrease of
	M180062	Connersvil 12th RlbtyUpgTDSIC								27%	6)		0 0)	associated indirects.
	TIN1805	Hagerstown Ribty Upg TDSIC	Î							7%	ó			(0		1
	TIN1834	Laf Concord Ribty Upg TDSIC								-11%	6	() ()	1
	TIN2064	Col Michigan CB_Rel Rpl TDSIC - TIN	1							-13%	6				0 0		1
	TIN2075	Allendale Ribty Upg TDSIC - TIN2075								-10%	6	1	n	1	0 1	1	+
	TIN1839	Princeton Ribty Upg TDSIC	1							2%		1		1 7	1 /	1	+
	M180321	Dudleytown Jct Instl RTU	1							0%		1	1	1	, ,	1	+
Fransmission System Substation Improvemen		Dudicytowii Jet IIIsti N I U	99,066,925	24 111 54	1 122 170 40	6 134,283,415	_	134,283,415	1 104 040		443,405	2,721	446,126	447,50	3 1,37	7 09	y .

^{1.} Includes 2016-2017 In Service Project Carryforward values

^{2.} Includes 200-2007 in Service Frigite Carryto ward values
2. Only includes projects from TDSIC-5 Plan that did go into service through 2018 and excludes Contingency,
3. Contingency and Under-Run applied to capital Actuals exceeding the Approved TDSIC-5 Plan by more than 20%; application of Contingency and Under-Run bring variance to 20%. Contingency and Under-Run applied at the Filing Project level.

VERIFICATION

I hereby verify under the penalties of perjury that the foregoing representations are true to the best of my knowledge, information and belief.

Dated: _April 28, 2021