

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF SOUTHERN INDIANA GAS AND)
ELECTRIC COMPANY d/b/a CENTERPOINT)
ENERGY INDIANA SOUTH. ("CEI SOUTH"))
FOR APPROVAL OF (1) TIME OF USE ("TOU")) CAUSE NO. 46263
AND CRITICAL PEAK PRICING ("CPP"))
RATES FOR CEI SOUTH'S CPP PILOT)
PROGRAM; (2) MODIFICATION OF THE TOU)
SUMMER PERIOD FOR THE CPP PILOT)
PROGRAM; AND (3) CEI SOUTH'S RATE RS-
CPP TARIFF.

PETITION

Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South ("Petitioner" or "CEI South") respectfully petitions the Indiana Utility Regulatory Commission ("Commission") for approval of: (1) time of use ("TOU") and ("CPP") rates for CEI South's CPP Pilot program; (2) modification of the time of use summer period for the CPP Pilot program; and (3) CEI South's Rate RS-CPP Tariff.

CEI South's CPP Pilot was approved in Cause No. 45990 as contemplated by the Settlement Agreement approved in that Cause. This Petition and CEI South's Case-in-Chief constitute CEI South's compliance filing under the Order dated February 3, 2025 with respect to the CPP Pilot.

In support hereof, CEI South shows the Commission:

Petitioner's Regulated Status

1. Petitioner is an operating public utility incorporated under the laws of the State of Indiana, with its principal office at 211 NW Riverside Drive, Evansville, Indiana. CEI South has charter power and authority to engage in, and is engaged in the business of, rendering retail electric service solely within the State of Indiana under indeterminate

permits, franchises, and necessity certificates heretofore duly acquired. CEI South owns, operates, manages, and controls, among other things, plant, property, equipment, and facilities that are used and useful for the production storage, transmission, distribution, and furnishing of electric service to approximately 150,000 electric consumers in southwestern Indiana. Its service territory is spread throughout seven counties: Pike, Gibson, Dubois, Posey, Vanderburgh, Warrick and Spencer counties.

2. Petitioner is a “public utility” under Ind. Code § 8-1-2-1 and is subject to the jurisdiction of this Commission in the manner and to the extent provided by the Public Service Commission Act, as amended, and other pertinent laws of the State of Indiana. Petitioner is also subject to the jurisdiction of the Federal Energy Regulatory Commission (“FERC”).

Background

3. In Cause No. 45990, CEI South proposed, and the Commission approved, a new time-of-use (“TOU”) rate with a critical peak pricing (“CPP”) pilot program to allow for more efficient utilization of CEI South’s system and to provide a tool to help manage peak loads during the hours of highest usage and provide customers with an opportunity to lower their bills. The approved program includes a residential pilot limited to 500 participants. The program was proposed as a pilot program so that CEI South can better understand potential benefits of a full program and build effective communication tools to help ensure the future success of the program. In Cause No. 45990, CEI South presented indicative tariffs with the understanding that following Commission approval of the CPP Pilot, CEI South would file a request in a separate proceeding for approval of updated TOU and CPP rates. This is that proceeding.

4. In Cause No. 45990, CEI South proposed, and the Commission approved, a Rate RS-CPP that included separate non-summer and summer rates.

5. Following the Order in Cause No. 45990 approving the pilot program, CEI South kicked off the rate development study, began the IT and billing infrastructure setup, and continues to consult with Cadmus to finalize design work.

Requested Relief.

6. Pursuant to the Order in Cause No. 45990 and the Settlement approved therein, Petitioner requests approval of updated CPP and TOU rates to replace the indicative rates presented in that Cause. The proposed rates preserve the approved rate relationships and ratios presented in the indicative tariffs in Cause No. 45990 and align with cost-based calculations. The TOU-CPP pilot rates were updated to be revenue neutral to current effective rates. The updated TOU-CPP rates in Petitioner's case-in-chief in this proceeding were based on Phase 1 rates under Cause No. 45990; however, as indicated below, Petitioner is proposing that upon filing of its Phase 2 rates in that Cause, the TOU-CPP pilot rates be updated to be revenue neutral to the then-effective Phase 2 rates.

7. Petitioner further requests a revision to the Rate RS-CPP tariff to modify the Time-of-Use season, changing the effective summer period from March through September to June through September. Based on 2021-2024 data, the months of March, April and May see less difference in load over the average day, similar to the other non-summer months. The proposed rates were updated based on the proposed change to the definition of summer for purposes of the TOU-CPP pilot to include only the four months

of June through September. This change results in a reduction to summer usage and therefore higher summer rates of 5.2% while maintaining revenue neutrality.

8. CEI South has also added language to the Rate RS-CPP tariff to clarify that net metering customers will be excluded from participating in the CPP Pilot.

Implementation of the TOU with CPP Pilot

9. CEI South requests the rates be approved and made effective Q1 2026. The Company plans to begin the pilot in Q2 2026. As explained further in CEI South's case-in-chief testimony, CEI South proposes the CPP-TOU rates be further updated at the time of its Phase 2 compliance filing to implement rates pursuant to the Order in Cause No. 45990, its most recent general rate case.

Applicable Law

10. Petitioner considers the provisions of the Public Service Commission Act, as amended, may be applicable to this proceeding, including Ind. Code § 8-1-2-38, among others.

Petitioner's Counsel

11. Petitioner's duly authorized representatives to whom all correspondence and communications in this Cause should be sent are:

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Procedural Matters

12. Pursuant to 170 IAC 1-1.1-9(a)(8) of the Commission's Rules of Practice and Procedure, Petitioner will file a proposed procedural schedule within thirty (30) days of the date of this Petition. Petitioner will seek to reach agreement with the Indiana Office of Utility Consumer Counselor regarding the proposed procedural schedule for this proceeding.

Discovery will be conducted on an informal basis with responses due within ten (10) calendar days until Petitioner files its rebuttal testimony. Thereafter, responses will be due within five (5) business days. Discovery served after noon on Friday or the day preceding a legal holiday will be deemed served the following business day.

WHEREFORE, Petitioner Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South requests that the Commission promptly publish notice, make such investigation and hold hearings as are necessary or advisable and thereafter issue an Order:

- (a) approving updated time-of-use ("TOU") and critical peak pricing ("CPP") rates for Petitioner's TOU-CPP Pilot Program;
- (b) approving certain modifications to the TOU summer season;

- (c) approving Petitioner's Rate RS-CPP Tariff; and
- (d) making such further orders and providing such further relief to Petitioner as may be appropriate.

Dated this 20th day of June, 2025.

Respectfully submitted,

SOUTHERN INDIANA GAS AND ELECTRIC COMPANY
D/B/A CENTERPOINT ENERGY INDIANA SOUTH

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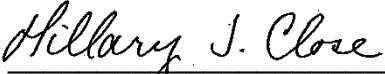
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petition was served via electronic transmission, this 20th day of June, 2025, addressed to:

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DMS 47814631v1