

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF NORTHERN)
INDIANA PUBLIC SERVICE COMPANY LLC)
FOR APPROVAL OF GDSM FACTORS FOR)
GAS SERVICE RENDERED DURING THE)
MONTHS OF JANUARY THROUGH) CAUSE NO. 44001-GDSM-14
DECEMBER 2021, CONTINUED ACCOUNTING)
AUTHORITY IN ACCORDANCE WITH THE)
ORDER OF THE COMMISSION IN CAUSE NO.)
45012, AND AUTHORITY TO CHANGE THE)
FILING DATE OF FUTURE ANNUAL GDSM)
TRACKER PROCEEDINGS.)

PETITIONER'S NOTICE OF SUBSTITUTION OF WITNESS AND
SUBMISSION OF ASSOCIATED REVISIONS TO TESTIMONY

Northern Indiana Public Service Company LLC, by counsel, hereby gives notice that Jennifer Staciwa will substitute for and will adopt the prefiled direct testimony and attachments of Victoria Vrab. A clean version of Ms. Staciwa's entire direct testimony (without attachments) is attached, as well as a redlined version of the pages that were changed. The clean version of Ms. Staciwa's direct testimony (with attachments) will be offered into evidence at the evidentiary hearing.

The substitution of witness also affects information in the direct testimony of Lisa A. Schneider. A clean and redlined version of the pages that were changed are attached. The clean version of the pages that were changed will be included in Ms. Schneider's direct testimony offered into evidence at the evidentiary hearing.

Respectfully submitted,



Kay Pashos (No. 11644-49)

Mark Alson (No. 27724-64)

Ice Miller LLP

One American Square, Suite 2900

Indianapolis, Indiana 46282-0002

Pashos Phone: (317) 236-2208

Alson Phone: (317) 236-2263

Pashos Fax: (317) 592-4676

Alson Fax: (317) 592-4698

Email: kay.pashos@icemiller.com

Email: mark.alson@icemiller.com

Attorneys for Petitioner

Northern Indiana Public Service Company LLC

Certificate of Service

The undersigned hereby certifies that on October 7, 2020, the foregoing was served via email transmission upon Randall C. Helmen and Jeffrey M. Reed, Indiana Office of Utility Consumer Counselor, 115 W. Washington Street, Suite 1500 South, Indianapolis, Indiana 46204 (rhelmen@oucc.in.gov, jreed@oucc.in.gov, infomgt@oucc.in.gov). A courtesy copy has also been provided by email transmission to Jennifer Washburn, Citizens Action Coalition, 1915 West 18th Street, Suite C, Indianapolis, Indiana 46202 (jwashburn@citact.org).



Mark R. Alson

VERIFIED DIRECT TESTIMONY OF JENNIFER STACIWA

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

2 A1. My name is Jennifer Staciwa. My business address is 801 E. 86th Avenue,
3 Merrillville, Indiana 46410. I am employed by Northern Indiana Public
4 Service Company LLC ("NIPSCO" or the "Company") as Manager of DSM
5 Reporting.

6 **Q2. Please summarize your employment and educational background.**

7 A2. I graduated from Ball State University in 2000 with a Bachelor of Science
8 degree in Business majoring in Finance and Economics. Following
9 graduation, I was employed by Panduit Corporation as a Financial Analyst.
10 In 2006, I accepted a Lead Risk Analyst position within NiSource's Treasury
11 department, and I also completed my Master of Business Administration
12 degree from Indiana University Northwest. I was promoted to Enterprise
13 Risk Manager in 2013. In June 2013, I accepted the position of Manager of
14 DSM Reporting for NIPSCO's Demand Side Management Programs.

15 **Q3. What are your responsibilities as Manager of DSM Reporting?**

1 A3. As Manager of DSM Reporting, I am responsible for leading the DSM
2 Reporting team to ensure timely and accurate reporting. I work closely
3 with NIPSCO vendors to support cost effective program implementation,
4 the annual evaluation, measurement, and verification process, and the
5 market potential study.

6 **Q4. What is the purpose of your testimony?**

7 A4. The purpose of my testimony is to (1) describe the reconciliation of
8 projected and actual Program Costs¹ for the period January through
9 December 2019 (the “reconciliation period”), (2) discuss the projected
10 Program Costs for the period January through December 2021 (the “billing
11 period”), (3) describe the basis for the projection of performance and
12 associated Program Costs for the billing period, (4) describe the therm
13 reductions that are being used in the calculation of projected lost revenues
14 for the billing period, (5) describe the attachments that support Schedules 1
15 and 3, and (6) provide a high level performance summary of the programs
16 included in Program Year 2020 through May 31, 2020. I also discuss

¹ Program Costs includes start-up, implementation and administrative costs along with costs associated with the evaluation, measurement and verification (“EM&V”). The costs associated with EM&V are not projected in a prior filing but reflect actual EM&V costs.

1 NIPSCO's proposal to change the filing date of future annual GDSM tracker
2 proceedings.

3 **Q5. Please provide a background of NIPSCO's gas energy efficiency**
4 **programs.**

5 A5. On February 22, 2017, the Commission issued an Order in Cause No. 44001-
6 GDSM-10 authorizing NIPSCO's proposed transition from semi-annual to
7 annual GDSM filings. The Commission set the date by which NIPSCO
8 should make its annual GDSM tracker proceeding to July 15.

9 On November 21, 2018, the Commission issued an Order in Cause No.
10 45012 (the "45012 Order") approving a Settlement Agreement among
11 NIPSCO, the Indiana Office of Utility Consumer Counselor ("OUCC") and
12 the Citizens Action Coalition of Indiana, Inc. for approval of NIPSCO's
13 proposed energy efficiency programs for the period January 1, 2019
14 through December 31, 2021 (the "2019-2021 Energy Efficiency Plan") for gas
15 service, including NIPSCO's proposed energy efficiency goals, the
16 proposed programs to achieve those goals, the program budgets and costs,
17 the evaluation, measurement and verification ("EM&V") procedures for the
18 programs, associated ratemaking and accounting treatment, and

1 modification of Rider 472 – Energy Efficiency Rider. The ratemaking and
2 accounting treatment includes timely recovery through NIPSCO's Rider
3 172 – Gas Demand Side Management ("GDSM Rider") and Appendix C –
4 GDSM Factors (the "GDSM Mechanism") of direct and indirect program
5 costs and EM&V costs ("Program Costs") along with recovery of lost
6 revenues (the lost component of fixed costs resulting from implementation
7 of those programs) associated with measures installed as part of any gas
8 energy efficiency program offered by NIPSCO beginning with the month
9 of January 2019, and authority to defer costs until such costs are reflected in
10 Petitioner's retail gas rates.

11 **Q6. What attachments are you sponsoring?**

12 A6. NIPSCO's Verified Petition initiating this Cause is attached hereto as
13 Attachment 2-A. I sponsor Attachment 2-A, Schedule 1 (showing the
14 Program Costs) and Schedule 3 (showing the projected cumulative net
15 savings in therms for the billing period) used to calculate the proposed
16 GDSM Factors. NIPSCO Witness Lisa A. Schneider sponsors the remaining
17 schedules in Attachment 2-A (showing NIPSCO's calculation of the
18 proposed GDSM Factors).

1 I also sponsor Attachment 2-B showing the work product that feeds into
2 Schedule 1, Attachment 2-C showing the work product that feeds into
3 Schedule 3 and Schedule 5, and Attachment 2-D, which is NIPSCO's
4 scorecard for its 2019-2021 Energy Efficiency Plan for the program period
5 January through May 2020.

6 Attachment 2-A, Schedules 1 and 3, and Attachments 2-B through 2-D were
7 all prepared by me or under my direction and supervision and the
8 information set forth therein is true and correct.

9 **Q7. Please describe the Program Costs reflected in this filing.**

10 A7. In this filing, NIPSCO is including (1) projected start-up, implementation
11 and administrative costs for the billing period, (2) actual EM&V costs
12 incurred during the reconciliation period for measures installed in January
13 through December 2018, and the reconciliation period, and (3) projected
14 lost revenues for the billing period. This filing also includes a reconciliation
15 of (1) start-up, implementation and administrative costs, (2) lost revenues,
16 and (3) the revenue requirement, for the reconciliation period.

17 **Q8. Please explain the role NIPSCO's Oversight Board ("OSB") has in**
18 **program design and budget modifications.**

1 A8. The NIPSCO OSB for its gas energy efficiency programs was first
2 established in the Commission's May 9, 2007 Order in Cause No. 43051.
3 NIPSCO continues to build on the strong relationship it has with its OSB
4 and works with its members on any changes to program designs.
5 NIPSCO's OSB provides general recommendations throughout the year
6 and approves program design changes and budgets as provided within
7 Commission approval and the OSB governance document. Over the course
8 of the program year, the OSB monitors the programs and provides
9 oversight of and approval for programmatic changes.

10 **Q9. Has the OSB approved any program changes for the energy efficiency**
11 **programs included in year 2021?**

12 A9. Yes. The OSB approved a new Residential Marketplace Program, an online
13 marketplace enabling customers to purchase discounted energy efficient
14 products. This program may be available to customers by the end of 2020.

15 **Q10. Please explain NIPSCO's change in program implementers.**

16 A10. In November 2019, TRC Companies ("TRC") acquired Lockheed Martin
17 Distributed Energy Solutions, the program implementer previously
18 selected by NIPSCO with input from the OSB. As a result of this purchase,

1 and with the understanding that TRC would retain all employees with
2 whom NIPSCO had been working, the Company agreed to continue the
3 contract.

4 **Q11. Please describe the energy efficiency programs included in NIPSCO's**
5 **2019-2021 Energy Efficiency Plan.**

6 A11. NIPSCO's 2019-2021 Energy Efficiency Plan includes the following
7 programs:

8 ***Residential Programs***

- 9 • Residential Heating Ventilation and Air Conditioning ("HVAC")
10 Rebates Program: The HVAC Rebates Program, which is marketed
11 as the Energy Efficiency Rebate Program, is designed to incentivize
12 natural gas customers to replace inefficient HVAC equipment with
13 energy efficient alternatives. These measures are paid per-unit
14 installed, reimbursing the customer for a portion of the cost. The
15 program's intent is to help remove the financial barrier associated
16 with the initial cost of these energy efficient alternatives. The
17 primary marketing driver for these programs is the construction of
18 a strong and active network of trade allies who are capable of
19 promoting the program to NIPSCO customers directly.
- 20 • Residential Home Energy Analysis Program: The Home Energy
21 Analysis Program, which is marketed as the Home Energy
22 Assessment ("HEA") Program, provides homeowners with the
23 direct install of low-cost, energy-efficient measures followed by the
24 delivery of a Comprehensive Home Assessment ("CHA") report to
25 the customer. The HEA Program is designed to help homeowners
26 improve the efficiency, safety, and comfort of their homes, as well as
27 deliver an immediate reduction in natural gas consumption and

1 promote additional efficiency work. In 2020, TRC subcontracted
2 with SEEL LLC to execute this program.

- 3 • School Education Program: The School Education Program, which
4 is marketed as the Energy Efficiency Education Program, produces
5 cost-effective natural gas savings by influencing 5th grade students
6 and their families to focus on conservation and the efficient use of
7 natural gas. It provides classroom instruction, posters, and activities
8 aligned with national and state learning standards and energy
9 education kits filled with energy-saving products and advice.
10 Students participate in an energy education presentation at school,
11 learning about basic energy concepts through class lessons and
12 activities. The students also receive an energy education kit of
13 quality, high-efficiency products, that they are instructed to install at
14 home with their families. The experience at home completes the
15 learning cycle started at school. TRC utilizes the services of the
16 National Energy Foundation ("NEF") to administer this program.

- 17 • Residential Multifamily Direct Install ("MFDI") Program: The
18 MFDI Program is designed to provide a "one-stop shop" to
19 multifamily building owners, managers, and tenants of multifamily
20 units containing three or more residences receiving service from
21 NIPSCO. The program generates immediate energy savings and
22 improvements in two distinct program phases. Phase I is a
23 walkthrough assessment of each property, while Phase II is an in-
24 unit direct installation of energy-efficient devices at no-cost or low-
25 cost to the tenant or landlord, such as low-flow showerheads, faucet
26 aerators, pipe wrap, and programmable thermostats. In 2020, TRC
27 subcontracted with SEEL LLC to execute this program.

- 28 • Residential Behavioral Program: The Behavioral Program, which is
29 marketed as the Home Energy Report, significantly increases energy
30 efficient behavior through customer engagement across a selected
31 population within the NIPSCO service territory. Home Energy
32 Reports are sent to the select population to: 1) show large-scale,
33 measurable, and cost-effective energy savings over a one year
34 period; 2) to increase program participation in select NIPSCO energy
35 efficiency programs; and 3) increase customer satisfaction through

an improved customer experience. TRC utilizes the services of Oracle to administer this program.

- Residential New Construction Program: The New Construction Program is designed to increase awareness and understanding by home builders of the benefits of energy-efficient building practices, with a focus on capturing energy efficiency opportunities during the design and construction of single family homes. This program produces long-term, cost-effective savings as a result of the training they have received to achieve the various Home Energy Rating System (HERS) tiers, along with strategies for incorporating the Silver, Gold, and Platinum approaches and for creating energy efficiency messages into their marketing efforts to home buyers.
- Residential HomeLife EE Calculator Program: The HomeLife EE Calculator Program is designed to offer NIPSCO residential customers an online “do-it-yourself” audit and an energy savings kit for carrying out this audit at no cost to the customer. The audit tool effectively: 1) identifies low-cost/no-cost measures that a NIPSCO residential customer can easily implement to manage gas consumption; 2) allows eligible customers to request a free home energy kit; 3) educates customers about the variety of programs available to them through the residential EE portfolio; and 4) assists customers in finding qualified and experienced contractors through TRC’s trade ally network. TRC utilizes the services of NEF to provide the home energy kits for this program.
- Residential Employee Education Program: The Employee Education Program is designed to offer valuable information to employees of NIPSCO’s commercial and industrial (“C&I”) customers by providing residential energy efficiency training seminars at the place of employment. At these seminars, educational materials are provided to inform residential customers of energy savings opportunities and methods to proactively manage their energy consumption. At the completion of the EE seminar, employees are encouraged to complete a postcard included in the information packet in order to receive an EE kit. TRC utilizes the services of AM Conservation Group to administer this program.

- 1 • Residential Income Qualified Weatherization ("IQW") Program:
2 The IQW Program provides energy efficiency services to income
3 qualified households. Qualifying participants receive an in-home
4 energy assessment to identify the areas of the home that can be
5 improved so that energy is used more efficiently to help make the
6 home more comfortable and reduce energy costs. In 2020, TRC
7 subcontracted with SEEL LLC to execute this program.

8 *C&I Programs*

- 9 • C&I Prescriptive Program: The Prescriptive Program offers a menu
10 of incentives to commercial and industrial customers for installing
11 energy efficient measures by reimbursing a portion of their cost of
12 those pre-selected measures. Customers may have concerns about
13 the initial cost associated with implementing larger energy efficiency
14 upgrades; the incentives provided by this program help remove that
15 barrier.
- 16 • C&I Custom Program: The Custom Program is available to
17 commercial and industrial customers for non-prescriptive efficiency
18 measure projects. This program is designed for more complicated
19 projects, or those that incorporate alternative technologies where
20 incentives are based on calculated energy savings. Each project is
21 specially designed by or for the customer and is thoroughly
22 reviewed by TRC. The purpose of this program is to provide
23 customers with additional ways for saving energy outside of the
24 traditional rebate program. In 2019, the Custom Program absorbed
25 the Retro-Commissioning Program measures that were previously
26 approved to be included in the 2019-2021 Energy Efficiency Plan.
- 27 • C&I New Construction Program: The New Construction Program is
28 designed to encourage energy efficient new construction of
29 commercial and industrial facilities within NIPSCO's service
30 territory. This program offers financial incentives to encourage
31 building owners, designers and architects to exceed standard
32 building practices and achieve efficiency, above and beyond the
33 current statewide building code requirements. The goal of the New
34 Construction Program is to produce newly constructed and

expanded buildings that are among the most efficient in the nation.

- C&I Small Business Direct Install ("SBDI") Program: The SBDI Program is designed to assist small and medium commercial customers throughout NIPSCO's service territory in reducing energy costs. The SBDI Program provides energy-saving measures paying up to the total cost (material and labor) of the measure by SBDI trade allies.

Q12. Please provide an update regarding the marketing funding approved in the 45012 Order.

A12. As part of the 2019-2021 Energy Efficiency Plan, the Commission approved marketing funds equal to 2.5% of the approved vendor implementation costs for NIPSCO to encourage participation in its energy efficiency programs. Based on this approval, NIPSCO engaged PACO Collective to design and implement a campaign for each year of NIPSCO's 2019-2021 Energy Efficiency Program. NIPSCO's forecast for 2021 includes marketing expenses of \$141,179 (included with the Administration expenses).

Q13. Please explain Schedule 1.

A13. Schedule 1 provides a breakdown of projected and reconciled Program Costs. This filing includes projected Program Costs for the billing period, and reconciles the projected Program Costs to actual Program Costs for the reconciliation period. Specifically:

- 1 • Column (a) of Schedule 1 (Line 21) shows the projected Program
2 Costs for the reconciliation period of \$5,854,033.
- 3 • Column (b) of Schedule 1 (Line 21) shows the actual Program Costs
4 for the reconciliation period of \$6,433,556.
- 5 • Column (c) of Schedule 1 (Line 21) shows the reconciliation of the
6 projected Program Costs to actual Program Costs for the
7 reconciliation period resulting in an under-recovery of \$579,523.
- 8 • Column (d) of Schedule 1 (Line 21) shows the projected Program
9 Costs for the billing period of \$6,070,716.
- 10 • Column (e) of Schedule 1 (Line 21) shows the total Program Costs
11 for the billing period of \$6,650,240.

12

13 **Q14. Please explain the reconciliation of projected to actual Program Costs for**
14 **the reconciliation period.**

15 A14. The reconciliation of the projected to actual Program Costs for the
16 reconciliation period resulted in an under-recovery of \$579,523 [Schedule 1,
17 Column (c)]. The under-recovery of costs is the result of updating 2019
18 savings and expenditures to reflect 2018 projects that were processed in
19 2019, along with OSB-approved funding specifically for the IQW Program
20 to achieve additional savings beyond the initial savings goal. The portfolio
21 achieved the increased savings goals for 2019. Adding the projected
22 Program Costs for the billing period of \$6,070,716 [Schedule 1, Column (d)]

1 to the under-recovery of projected costs from the reconciliation period of
2 \$579,523 [Schedule 1, Column (c)], results in total Program Costs of
3 \$6,650,240 [Schedule 1, Column (e)] to be collected in this filing.

4 **Q15. What did NIPSCO use as a basis for its projection of program**
5 **performance and associated costs in this filing?**

6 A15. The projections for the billing period were based on a forecast provided by
7 TRC.

8 **Q16. Please explain Schedule 3.**

9 A16. Schedule 3 provides a breakdown, by program, of the projected cumulative
10 net therm savings for the billing period (for measures installed or to be
11 installed January 2019 through December 2021). These saving projections
12 then feed into Schedule 4 to be allocated and monetized into dollars used
13 in the calculation of lost revenues. Schedule 5 shows the reconciliation of
14 actual to projected lost revenues during the reconciliation period.

15 **Q17. Please explain the drivers of the under-recovery of lost revenues for the**
16 **reconciliation period.**

17 A17. The under-recovery of \$169,055 is largely attributed to the Residential
18 Behavioral Program. The projected lost revenue was based on a

1 significantly lower savings goal. The original program design called for a
2 decrease in the number of reports to be sent. However, given the success
3 from previous years and the fact that reports are a vehicle to encourage
4 participation in other energy efficiency programs, with approval of the
5 OSB, NIPSCO elected to maintain the number of reports to be sent and
6 updated the savings goal and corresponding budget accordingly. In
7 addition, the program achieved 163% of the increased goal resulting in an
8 additional under-recovery of lost revenue.

9 **Q18. Please explain Attachment 2-B.**

10 A18. Attachment 2-B is the work product that feeds into Schedule 1. This
11 attachment provides the actual Program Costs incurred during the
12 reconciliation period and the projected Program Costs for the billing period.
13 Attachment 2-B consists of the following:

- 14 • "GDSM Plan Expense" is a detailed account of projected expenses
15 for the billing period that directly feed Schedule 1, Column (d).
- 16 • "GDSM Actual Expense" is a detailed account of the actual expenses
17 incurred in the reconciliation period that directly feed Schedule 1,
18 Column (b).

19

20 **Q19. Please explain Attachment 2-C.**

1 A19. Attachment 2-C is the work product that feeds into Schedule 3 providing
2 the detailed calculations supporting the projected therm savings.

3 Attachment 2-C consists of the following:

- 4 • "Schedule 3, 2019" captures the DSM projected therm savings by
5 program and rate schedule for measures installed in 2019.
- 6 • "Schedule 3, 2020" captures the DSM projected therm savings by
7 program for measures installed or to be installed in 2020.
- 8 • "Schedule 3, 2021" captures the DSM projected therm savings by
9 program for measures to be installed in 2021.
- 10 • "Schedule 5, Actual Lost Revenue" captures the DSM actual therm
11 savings and lost revenue by program and rate schedule for measures
12 installed in 2019.
- 13 • "Reference" is a program key with rate per therm detail.

14
15 **Q20. Please explain the impact of the COVID-19 pandemic on NIPSCO's**
16 **programs.**

17 A20. NIPSCO has worked to balance customer and employee/contractor safety
18 with maintaining program offerings. Beginning March 16, 2020, NIPSCO
19 suspended all in-home activities in the HEA, MFDI and IQW programs, as
20 well as the Employee Education and School Kits programs. NIPSCO has
21 continued to offer its other programs, including C&I programs. The HVAC
22 Rebates, Behavioral, New Construction and C&I programs continue to

1 perform well during the pandemic. TRC has made modifications to its C&I
2 programs to allow customers to submit documentation related to
3 installations rather than requiring an in-person inspection. NIPSCO
4 continues to monitor the situation and will not return to customer homes
5 until it is deemed appropriate to do so. The Company continues to work
6 with the OSB on changes to current programs and possible program
7 additions to respond to COVID-19.

8 **Q21. Please provide an overview of the performance of NIPSCO's 2019-2021**
9 **Energy Efficiency Plan.**

10 **A21.** As shown in Attachment 2-D, NIPSCO's programs included in Program
11 Year 2020 performed as follows:

- 12 • Residential HVAC Rebates Program – As of May 31, 2020, this
13 program achieved 87% of its savings goal. This program continues
14 to perform well.
- 15 • Residential HEA Program – As of May 31, 2020, this program
16 achieved 20% of its savings goal. For the safety of NIPSCO's
17 customers, this program is currently suspended due to COVID-19.
18 Interested participants are being added to a waiting list and will be
19 contacted on a first-come, first-served basis once the program
20 reopens.
- 21 • Residential School Education Program – During the spring semester,
22 4,336 kits were delivered and 36% of the savings goal was achieved
23 as of May 31, 2020. However, once schools were closed due to the

1 pandemic, the program was put on hold. To make up for the
2 shortfall, TRC plans to offer the program to sixth grade students that
3 were not able to participate as fifth graders.

- 4 • Residential MFDI Program – As of May 31, 2020, this program
5 achieved 0% of its savings goal due to the inability to access
6 residences during the pandemic. As of this filing, the program is
7 suspended, but TRC continues to communicate with interested
8 customers.

- 9 • Residential Behavioral Program – As of May 31, 2020, this program
10 achieved 103% of its savings goal.

- 11 • Residential New Construction Program – As of May 31, 2020, this
12 program achieved 117% of its savings goal. NIPSCO continues to
13 monitor the budget in the context of the overall portfolio and will
14 keep the OSB apprised.

- 15 • Residential HomeLife EE Calculator Program – As of May 31, 2020,
16 this program achieved 12% of its savings goal. The calculator is
17 available on NIPSCO's website and the program will have specific
18 marketing efforts during the second half of the year. NIPSCO
19 continues to work with TRC on marketing opportunities to increase
20 customer awareness and participation.

- 21 • Residential Employee Education Program - As of May 31, 2020, this
22 program achieved 0% of its savings goal. For the safety of NIPSCO's
23 customers, this program is currently suspended due to COVID-19.
24 Employers are being added to a waiting list and will be contacted on
25 a first-come, first-served basis once the program resumes.

- 26 • Residential IQW Program – As of May 31, 2020, this program
27 achieved 14% of its savings goal. For the safety of NIPSCO's
28 customers, this program is currently suspended due to COVID-19.
29 Interested participants are being added to a waiting list and will be
30 contacted on a first-come, first-served basis once the program
31 resumes.

- 32 • C&I Prescriptive Program – As of May 31, 2020, this program

1 achieved 5% of its savings goal. In addition to the achieved savings,
2 TRC has a "pipeline" of anticipated savings of 32,406 therms. These
3 anticipated savings are based on those applications that require
4 preapproval due to the larger incentive amount.

- 5 • C&I Custom Incentive Program – As of May 31, 2020, this program
6 achieved 23% of its savings goal with 314,954 therms in the
7 "pipeline."
- 8 • C&I New Construction Program – As of May 31, 2020, this program
9 achieved 113% of its savings goal with 140,703 therms in the
10 "pipeline."
- 11 • C&I SBDI Program – As of May 31, 2020, this program achieved 7%
12 of its savings goal with 40,026 therms in the "pipeline."

13
14 **Q22. Does NIPSCO provide regular program performance updates to the**
15 **Commission and other interested parties?**

16 A22. Yes. NIPSCO files a quarterly scorecard for its DSM Programs that includes
17 savings, budgeted and actual program expenditures excluding EM&V
18 expenditures, and forecasted and actual lost revenue expense. The
19 scorecards relating to the 2019-2021 Energy Efficiency Plan are filed in
20 Cause No. 45012.

21 **Q23. Please explain NIPSCO's proposal to change the filing date of its future**
22 **annual GDSM tracker proceedings to no later than August 15.**

1 A23. In its February 22, 2017 Order in Cause No. 44001 GDSM 10, the
2 Commission directed NIPSCO to make its annual GDSM tracker
3 proceedings no later than July 15. In this filing, NIPSCO is requesting to
4 make its future annual GDSM tracker proceedings (starting with GDSM 15)
5 no later than August 15 to allow additional time for the OSB to review the
6 EM&V report and to update the numbers from the EM&V report needed
7 for the tracker filing once the report is finalized. The OSB agreed to the
8 change in the filing date. If approved, NIPSCO and the OUCC have agreed
9 upon the following proposed procedural schedule for NIPSCO's future
10 annual GDSM tracker proceedings:

11 (a) NIPSCO will file its Case-in-Chief (including a verified petition,
12 proposed tariff revisions and supporting testimony) and provide the
13 OUCC and any Intervenors with copies of all supporting
14 workpapers (Audit Package) by August 15 of each year. NIPSCO's
15 Case-in-Chief will not be considered complete until all items listed
16 above are filed (or provided in the case of the Audit Package).

17 (b) The OUCC and any Intervenors will file their respective Cases-in-
18 Chief within seventy-five (75) days after NIPSCO files its Case-in-

1 Chief.

2 (c) NIPSCO will file its rebuttal testimony (if any) within eighty-five (85)
3 days after NIPSCO files its Case-in-Chief.

4 (d) Unless otherwise agreed to by the parties, NIPSCO will use best
5 efforts to provide the OUCC a draft proposed order seven (7)
6 business days in advance of the evidentiary hearing and the OUCC
7 will use best efforts to review and provide comments on the
8 proposed order at or before the hearing.

9 (e) Any responses or objection to a discovery request should be made
10 within ten (10) calendar days of the receipt of such request, and the
11 parties will utilize electronic discovery.

12 (f) An evidentiary hearing will be held approximately ninety-five (95)
13 days after NIPSCO files its completed Case-in-Chief, leaving
14 approximately four (4) weeks after the hearing for the Commission
15 to issue an order.

16 **Q24. Does this conclude your prepared direct testimony?**

17 **A24. Yes.**

VERIFICATION

I, Jennifer Staciwa, Manager of DSM Reporting of Northern Indiana Public Service Company LLC, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.



Jennifer Staciwa

Date: October 6, 2020

1 applicable for gas service rendered during the period January through
2 December 2021 (the "billing period").

3 **Q7. What attachments are you sponsoring?**

4 A7. NIPSCO's Verified Petition initiating this Cause is designated as
5 Petitioner's Exhibit No. 2, Attachment 2-A sponsored by Ms. Staciwa. Ms.
6 Staciwa sponsors Schedule 1, which summarizes the various program
7 costs, and Schedule 3, which shows the projected cumulative net therm
8 savings for the billing period.

9 I am sponsoring Petitioner's Exhibit No. 2, Attachment 2-A, Schedules 2,
10 4, 5, 6, and 7, showing NIPSCO's calculation of the proposed GDSM
11 Factors. I based my calculation of the proposed GDSM Factors on the
12 amounts in Schedules 1 and 3 sponsored by Ms. Staciwa.

13 I am also sponsoring Attachment 1-A showing the number of customers in
14 each Rate Schedule and the cost allocators, Attachment 1-B, which is a
15 clean and redline version of Appendix C – GDSM Factors reflecting the
16 proposed GDSM Factors, and Attachment 1-C showing the calculation of
17 the estimated average monthly bill impact.

1 Petitioner's Exhibit No. 2, Attachment 2-A, Schedules 2, 4, 5, 6, and 7 and
2 Attachments 1-A through 1-C were all prepared by me or under my
3 direction and supervision and the information set forth therein is true and
4 correct.

5 **Q8. Please describe the program costs reflected in this filing.**

6 A8. In this filing, NIPSCO is including (1) projected start-up, implementation
7 and administrative costs for the billing period, (2) actual EM&V costs
8 incurred in 2019 for measures installed in January through December
9 2018, and January through December 2019 (the "reconciliation period"),
10 and (3) projected lost revenues for the billing period. This filing also
11 includes a reconciliation of (1) start-up, implementation and
12 administrative costs, (2) lost revenues, and (3) the revenue requirement.

13 **Q9. Please explain the schedules used in the calculation of the proposed**
14 **GDSM Factors.**

15 A9. In addition to Schedules 1 and 3 sponsored and described by Ms. Staciwa,
16 the following schedules are used in the calculation of the proposed GDSM
17 Factors:

18 • Schedule 2 shows the allocation of projected program costs for the

VERIFIED DIRECT TESTIMONY OF ~~JENNIFER STACIWA~~~~VICTORIA A.~~
~~VRAB~~

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

2 A1. My name is ~~Jennifer Staciwa~~~~Victoria A. Vrab~~. My business address is 801
3 E. 86th Avenue, Merrillville, Indiana 46410. I am employed by Northern
4 Indiana Public Service Company LLC ("NIPSCO" or the "Company") as
5 ~~Manager~~ ~~Director~~ of ~~DSM Reporting~~~~Demand Side Management Programs~~.

6 Q2. Please summarize your employment and educational background.

7 A2. I graduated from Ball State University in 2000 with a Bachelor of Science
8 degree in Business majoring in Finance and Economics. Following
9 graduation, I was employed by Panduit Corporation as a Financial Analyst.
10 In 2006, I accepted a Lead Risk Analyst position within NiSource's Treasury
11 department, and I also completed my Master of Business Administration
12 degree from Indiana University Northwest. I was promoted to Enterprise
13 Risk Manager in 2013. In June 2013, I accepted the position of Manager of
14 DSM Reporting for NIPSCO's Demand Side Management Programs.~~I~~
15 ~~graduated from Purdue University in 1989 with a Bachelor of Arts degree~~
16 ~~in Communications with a concentration in Advertising and Public~~

1 ~~Relations. Beginning in 1998, I was employed by NESI Integrated~~
2 ~~Energy/EnergyUSA as a Senior Sales Coordinator. I accepted a position~~
3 ~~within NIPSCO's Major Accounts Department as a Major Accounts~~
4 ~~Representative in 2000 which is where I remained until June 2008. In June~~
5 ~~2008, I accepted the position of Manager, Major Accounts Transmission. In~~
6 ~~June 2009, I accepted the position of Manager, Gas Transportation, Sales~~
7 ~~Support and Choice. In March 2010, I accepted the position of Director,~~
8 ~~Major Accounts. On May 1, 2013, I left Major Accounts and accepted my~~
9 ~~current position as Director of Demand Side Management Programs.~~

10 **Q3. What are your responsibilities as Manager of DSM Reporting**
11 **Director of Demand Side Management Programs?**

12 **A3. As Manager of DSM Reporting, I am responsible for leading the DSM**
13 ~~Reporting team to ensure timely and accurate reporting. I work closely~~
14 ~~with NIPSCO vendors to support cost effective program implementation,~~
15 ~~the annual evaluation, measurement, and verification process, and the~~
16 ~~market potential study. As Director of Demand Side Management~~
17 ~~Programs, I am responsible for the design, implementation and day-to-day~~
18 ~~responsibilities of all demand side management ("DSM") and Energy~~

~~Efficiency ("EE") Programs. This includes leading the DSM Team and collaboratively working with NIPSCO's vendors and customers, and NIPSCO's Customer Service, Communications, Rates and Regulatory departments to assure that all programs are run in an efficient and effective way.~~

Q4. What is the purpose of your testimony?

A4. The purpose of my testimony is to (1) describe the reconciliation of projected and actual Program Costs¹ for the period January through December 2019 (the "reconciliation period"), (2) discuss the projected Program Costs for the period January through December 2021 (the "billing period"), (3) describe the basis for the projection of performance and associated Program Costs for the billing period, (4) describe the therm reductions that are being used in the calculation of projected lost revenues for the billing period, (5) describe the attachments that support Schedules 1 and 3, and (6) provide a high level performance summary of the programs included in Program Year 2020 through May 31, 2020. I also discuss

¹ Program Costs includes start-up, implementation and administrative costs along with costs associated with the evaluation, measurement and verification ("EM&V"). The costs associated with EM&V are not projected in a prior filing but reflect actual EM&V costs.

VERIFICATION

I, ~~Jennifer Staciwa, Manager of DSM Reporting~~ ~~Victoria A. Vrab, Director of Demand Side Management Programs~~ of Northern Indiana Public Service Company LLC, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.

A handwritten signature in black ink, appearing to read "Victoria Vrab", is written over a horizontal line.

~~Jennifer Staciwa~~ ~~Victoria A. Vrab~~

Date: ~~October 6~~ ~~July 15~~, 2020

Petitioner's Exhibit No. 1
Northern Indiana Public Service Company LLC
Cause No. 44001-GDSM-14
Revised Page 3

applicable for gas service rendered during the period January through December 2021 (the "billing period").

Q7. What attachments are you sponsoring?

A7. NIPSCO's Verified Petition initiating this Cause is designated as Petitioner's Exhibit No. 2, Attachment 2-A sponsored by Ms. Staciwa. Ms. Staciwa sponsors Schedule 1, which summarizes the various program costs, and Schedule 3, which shows the projected cumulative net therm savings for the billing period.

I am sponsoring Petitioner's Exhibit No. 2, Attachment 2-A, Schedules 2, 4, 5, 6, and 7, showing NIPSCO's calculation of the proposed GDSM Factors. I based my calculation of the proposed GDSM Factors on the amounts in Schedules 1 and 3 sponsored by Ms. Staciwa.

I am also sponsoring Attachment 1-A showing the number of customers in each Rate Schedule and the cost allocators, Attachment 1-B, which is a clean and redline version of Appendix C – GDSM Factors reflecting the proposed GDSM Factors, and Attachment 1-C showing the calculation of the estimated average monthly bill impact.

Deleted: Vrab

Deleted: Vrab

Deleted: Vrab

Petitioner's Exhibit No. 1
Northern Indiana Public Service Company LLC
Cause No. 44001-GDSM-14
Revised Page 4

Petitioner's Exhibit No. 2, Attachment 2-A, Schedules 2, 4, 5, 6, and 7 and Attachments 1-A through 1-C were all prepared by me or under my direction and supervision and the information set forth therein is true and correct.

Q8. Please describe the program costs reflected in this filing.

A8. In this filing, NIPSCO is including (1) projected start-up, implementation and administrative costs for the billing period, (2) actual EM&V costs incurred in 2019 for measures installed in January through December 2018, and January through December 2019 (the "reconciliation period"), and (3) projected lost revenues for the billing period. This filing also includes a reconciliation of (1) start-up, implementation and administrative costs, (2) lost revenues, and (3) the revenue requirement.

Q9. Please explain the schedules used in the calculation of the proposed GDSM Factors.

A9. In addition to Schedules 1 and 3 sponsored and described by Ms. [Staciwa](#), the following schedules are used in the calculation of the proposed GDSM Factors:

- Schedule 2 shows the allocation of projected program costs for the

Deleted: Vrab