FILED
September 9, 2020
INDIANA UTILITY
REGULATORY COMMISSION

Petitioner's Exhibit 5 9-9-2020 Corrected Direct Testimony of Laurie A. Tomczyk

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF THE CITY OF)	Fig. 4 Fig. 11 Strate Action 18
CRAWFORDSVILLE, INDIANA, BY AND)	
THROUGH ITS MUNICIPAL ELECTRIC)	
UTILITY, CRAWFORDSVILLE ELECTRIC)	CAUSE NO. 45420
LIGHT AND POWER, FOR APPROVAL OF A)	
NEW SCHEDULE OF RATES AND CHARGES)	11106
FOR ELECTRIC SERVICE AND FOR)	IURC
APPROVAL TO MODIFY ITS ENERGY COST)	PETITIONER'S
ADJUSTMENT PROCEDURES)	EXHIBIT NO. 5
		2-16-21
		THATE C REPORTER

PRE-FILED VERIFIED DIRECT TESTIMONY OF

LAURIE A. TOMCZYK

AND ATTACHMENTS LAT-1 THRU LAT-5

ON BEHALF OF PETITIONER

CRAWFORDSVILLE POWER & LIGHT

PETITIONER'S EXHIBIT NO. 5

AUGUST 19, 2020

Table of Contents

I. INTRODUCTION AND QUALIFICATIONS	3
II. ECA CALCULATIONS	4
III. ADJUSTMENT 2 TO THE REVENUE REQUIREMENT STUDY	8
IV. CHANGES TO CELP'S NON-RECURRING CHARGES	10
V. LIGHTING RATE DESIGN	13
VI. SUMMARY AND CONCLUSIONS	15

I. INTRODUCTION AND QUALIFICATIONS

- 2 O1. PLEASE STATE YOUR NAME AND ON WHOSE BEHALF YOU ARE
- 3 TESTIFYING.

1

12

13

14

15

16

18

19

20

21

22

- A. My name is Laurie Tomczyk. I am employed as an Executive Consultant by NewGen 4
- 5 Strategies and Solutions, LLC ("NewGen"). My business address is 4528 Trails End, Lapeer,
- Michigan. NewGen is a consulting firm that specializes in utility rates, engineering economics, 6
- 7 financial accounting, asset valuation, appraisals, and business strategy for electric, natural gas,
- 8 solid waste, water, and wastewater utilities. I am testifying on behalf of the Petitioner,
- 9 Crawfordsville Electric Light & Power ("CEL&P" or the "Utility"), which is the electric utility
- owned and operated by the City of Crawfordsville, Indiana ("Crawfordsville"). 10

11 Q2. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.

A. I have been employed by NewGen since January 2014. Prior to joining NewGen, I was employed by R. W. Beck, Inc. (or one of its successors) since 1988. R.W. Beck, Inc. was eventually acquired by Science Applications International Corporation ("SAIC"), which is now Leidos Engineering LLC. Prior to joining R. W. Beck, I was employed by HDR, Inc. in Omaha, Nebraska from 1986 through mid-1988. I have over 30 years of experience in 17 providing management consulting services to clients involved in the electric power, water, and solid waste management industries. I specialize in electric utility revenue requirement analyses, cost of service and rate design studies, financial projections, expert witness services, and other engineering and economic analyses. I have been an instructor on behalf of Electric Utility Consultants, Inc. for courses on cost of service concepts and techniques and rate design for electric utilities. I am a registered professional engineer in the State of Colorado.

1 Q3. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE INDIANA UTILITY

- 2 **REGULATORY COMMISSION ("IURC" OR "COMMISSION")?**
- 3 A. Yes, my testimony before the IURC, as well as other state commissions on utility rate making
- 4 matters is summarized in my resume included as Attachment LAT-1.
- 5 Q4. WHAT ARE THE PURPOSES OF YOUR TESTIMONY?
- 6 A. The purposes of my testimony are to discuss and recommend the following:
- 7 1) Changes to CEL&P's calculation of its Energy Cost Adjustment ("ECA") tracker;
- 8 2) Changes to CELP's Non-Recurring Charges; and
- 9 3) Changes to CELP's LED fixture charges for streetlighting and outdoor lighting.
- 10 Q5. WHAT ATTACHMENTS ARE YOU SPONSORING IN THIS CAUSE?
- 11 A. I am sponsoring the following attachments to my direct testimony:
- Attachment LAT-1 Resume of Laurie A. Tomczyk
- Attachment LAT-2 Final Order in IURC Cause No. 36835-S3, December 13, 1989
- Attachment LAT-3 New ECA Model
- Attachment LAT-4 Calculation of Proposed Non-Recurring Charges
- Attachment LAT-5- Calculation of Proposed LED Lighting Rates
- 17 Q6. WERE THESE ATTACHMENTS PREPARED BY YOU OR UNDER YOUR
- 18 **SUPERVISION?**
- 19 A. Yes.
- 20 II. ECA CALCULATIONS
- 21 Q7. PLEASE EXPLAIN CEL&P'S ECA TRACKER.

- 1 A. Because CEL&P purchases its power exclusively from IMPA, the ECA was originally 2 established by the Commission in Cause No. 36835-S1 in 1983 as a mechanism by which
- CEL&P and other IMPA members could obtain Commission approval of periodic energy cost 3
- 4 adjustment and power tracking procedures that would allow CEL&P to track to its retail
- 5 customers' increases or decreases in the cost of power and energy CEL&P purchases from
- 6 IMPA outside of a base rate case. CEL&P makes quarterly ECA filings with the IURC.

Q8. WHEN WAS THIS PROCESS ESTABLISHED?

8 A. The use of a tracking mechanism to recover wholesale energy costs for Commission regulated 9 members of IMPA was first approved on January 11, 1983 in Cause No. 36835-S1, and 10 subsequently revised in orders in subdockets S2 (Final Order issued May 2, 1984) and S3 (Final Order issued December 13, 1989)¹ ("1989 ECA Order"). These procedures allow 12 Crawfordsville to appropriately reconcile any over or under collection of wholesale energy costs on a quarterly basis. As approved in the 1989 ECA Order, CEL&P submits to the 13 14 Commission ECA forms that calculate the per unit changes between CEL&P's current wholesale power costs and the wholesale power costs reflected in CEL&P's current rates, and 15 16 then CEL&P multiplies those changes by the next quarter's estimated billing determinants.² 17 Further, to eliminate the possibility of overcollection or undercollection, the form includes a 18 base rate change reconciliation procedure under which each quarter's estimation of the billing

7

11

¹ In the Matter of the Indiana Municipal Power Agency and the Indiana Cities and Towns, Members Thereof, to Modify, Simplify and Make More Equitable Certain Tracking Procedures Heretofore Authorized By This Commission to Track Increases or Decreases in the Cost of Purchased Power and Energy by Such Members From the Indiana Municipal Power Agency, IURC Cause No. 36835-S3, December 13, 1989. Please note that the Final Order in this Cause appears to be omitted from Westlaw's repository of Commission orders and hence no Westlaw citation is available. For ease of reference, it is included as Attachment LAT-2.

² Id. at *6-*7.

determinants used by CEL&P to bill its ratepayers is reconciled with the actual billing 1 2 determinants used by IMPA to bill CEL&P. The form requires CEL&P to take into 3 consideration IMPA's base rates, together with IMPA's energy cost adjustment factor, in 4 determining a quarterly variance between what CEL&P billed its ratepayers and what IMPA 5 billed CEL&P, resulting in a dollar for dollar flow through of IMPA's base rates and energy 6 cost adjustment charges. The form also requires CEL&P to report current estimates of CEL&P's generating costs and payments from IMPA on a quarterly basis.³ 7

8 Q9. AT A HIGH LEVEL, PLEASE DESCRIBE THE STEPS FOLLOWED TO

9 CALCULATE THE ECA RATES.

10

11

19

A. The ECA calculations first determine incremental changes in IMPA power costs to CEL&P between the quarter when the ECA rates will be in effect and those from CEL&P's last rate 12 case. These incremental costs are then allocated to the above categories of customer classes 13 based on the cost-of-service allocators from the last rate study, as adjusted for changes in load 14 since the last rate study. Next, the amount of historic under-recovery or over-recovery for each 15 of the categories of customer classes are then added or subtracted, respectively, to the 16 incremental power costs. The results for each of the categories of customer classes are then 17 divided by the appropriate billing determinants to arrive at the ECA rates identified in the quarterly filings. 18

010. HOW ARE THE HISTORIC UNDER OR OVER RECOVERY AMOUNTS

20 **DETERMINED?**

³ *Id.* at *8.

- 1 A. For the historic period, the incremental IMPA power costs to CEL&P as compared to those in
- 2 CEL&P's last rate case are first determined. These incremental costs are then allocated to the
- 3 above categories of customer classes based on the cost-of-service allocators from the last rate
- 4 study, as adjusted for changes in load since the last rate study. These amounts are then
- 5 compared to actual revenues from ECA rates during the historic period for each of the customer
- 6 class categories. The net of these amounts equals the historic over or under recovery.

7 Q11. HISTORICALLY, PLEASE IDENTIFY THE TYPES OF ECA RATES THAT

- 8 HAVE BEEN CALCULATED USING THE CURRENT ECA MODEL.
- 9 A. Historically, CELP's ECA rates have been calculated in the ECA model for each of the
- 10 following categories of rate schedules:
- Residential Service: Rate Schedule RS
- General Power and Municipal Power Service: Rate Schedules GP and MP
- Primary Power Service: Rate Schedule PP
- Outdoor Lighting: Rate Schedule PP
- Streetlighting: Rate Schedule SL
- Traffic Signals: Rate Schedule TS
- 17 O12. IN TERMS OF CALCULATING THE ECA RATES BASED ON DEMAND
- 18 CHARGES VERSUS ENERGY CHARGES, HOW HAVE CEL&P'S ECA RATES
- 19 HISTORICALLY BEEN ASSESSED WITHIN EACH OF THE ABOVE
- 20 CATEGORIES OF RATE SCHEDULES?
- 21 A. Historically, ECA rates have been calculated and assessed to the above categories of rate
- schedules all on an energy basis (i.e., dollar per kWh charges), except for Primary Power
- Service. For Primary Power Service, ECA rates have been calculated and assessed on both a

Table LAT-1 CEL&P Power Cost Adjustment

Line		Α	В	С
No.		Actual	Adjustments	Pro Forma
1	Demand Billing Determinants kW			
2	March thru December 2019	624,661	-	624,661
3	January thru February 2020	109,893	-	109,893
4	Total	734,554	-	734,554
5	Energy Billing Determinants kWh			
6	March thru December 2019	338,427,960	-	338,427,960
7	January thru February 2020	64,335,908	_	64,335,908
8	Total	402,763,868	-	402,763,868
9	IMPA Base Demand Rates \$/kW			
10	March thru December 2019	\$24.70	\$1.52	\$26.22
11	January thru February 2020	\$26.22	\$0.00	\$26.22
12	, ,	, -		·
13	IMPA ECA Demand Rates \$/kW	/ሱጋ ለፍ\	/ <u>#</u> 0.04\	(ቀኃ ኃር)
	March thru December 2019	(\$2.45)	(\$0.81)	(\$3.26)
14	January thru February 2020	(\$3.26)	\$0.00	(\$3.26)
15	IMPA Base Energy Rates \$/kWh			
16	March thru December 2019	\$0.030772	(\$0.001897)	\$0.028875
17	January thru February 2020	\$0.028875	\$0.000000	\$0.028875
18	IMPA ECA Energy Rates \$/kWh			
19	March thru December 2019	(\$0.003505)	\$0.001020	(\$0.002485)
20	January thru February 2020	(\$0.002485)	\$0.000000	(\$0.002485)
	•	(+/	,	(, ,
21	IMPA Demand Charges (Base & ECA)	M40 007 4F0	\$440.00 E	M44 040 040
22	March thru December 2019	\$13,897,458	\$442,885	\$14,340,343
23	January thru February 2020	\$2,522,814	\$0	\$2,522,814
24	Total	\$16,420,272	\$442,885	\$16,863,156
25	IMPA Demand Charges (Base & ECA)			
26	March thru December 2019	\$9,227,915	(\$296,801)	\$8,931,114
27	January thru February 2020	\$1,697,825	\$0	\$1,697,825
28	Total	\$10,925,740	(\$296,801)	\$10,628,938
29	Total IMPA Charges	\$27,346,011	\$146,083	\$27,492,095

3

4

Q16. PLEASE EXPLAIN THE BASIS OF THE ACTUAL IMPA POWER COSTS AS

5 SHOWN IN TABLE LAT-1.

- 6 A. At Lines 1 through 8 of Column A of Table LAT-1, the actual demand kW and energy kWh
- 7 used by IMPA to calculate the actual bills from IMPA to CEL&P for the test year period from
- 8 March 1, 2019, through February 29, 2020, are shown. The actual IMPA rates in effect during

1 that time period are shown in Column A of Table LAT-1 at Lines 9 through 20. The actual 2 annual charges based on these billing determinants and rates are shown in Column A of Table 3 LAT-1 at Lines 21 through 29. 4 Q17. PLEASE EXPLAIN THE BASIS OF THE PRO FORMA IMPA POWER COSTS 5 SHOWN IN TABLE LAT-1. 6 B. The actual demand kW and energy kWh, as shown in Column A of Table LAT-1 at Lines 1 7 through 8, were used to calculate the pro forma IMPA power costs as shown in Column C of 8 Table LAT-1 at Lines 1 through 8. The IMPA rates used to calculate the pro forma IMPA 9 power costs are the IMPA rates that became effective January 1, 2020, as shown in Column 10 C of Table LAT-1 at Lines 9 through 20. The pro forma charges based on the pro forma 11 billing determinants and rates are shown in Column C of Table LAT-1 at Lines 21 through 12 29. The resulting actual and pro forma purchased power costs are shown in Line 29 of Table 13 LAT-1, with the resulting adjustment to purchased power costs equal to \$146,083. 14 IV. CHANGES TO CELP'S NON-RECURRING CHARGES 15 Q18. PLEASE EXPLAIN THE PROPOSED CHANGES TO APPENDIX B IN CELP'S 16 TARIFF, WHICH CONTAINS THE UTILITY'S PROPOSED NON-RECURRING 17 CHARGES.

A. I am proposing to change the following non-recurring charges currently in CEL&P's Appendix

B – Non-Recurring Charges (referred to collectively as "Non-Recurring Charges") including

the Service Deposit, Return Check, Reconnect/Disconnect, Temporary Service, Meter Test,

Service Call, and Late Payment Charges by updating these fees for current labor, truck, and

18

19

20

21

- 1 materials costs.⁴ In the five years since CELP's last rate study, the costs of labor and materials
- 2 have increased. I am also proposing to add Meter Base, Electrical Permit, and Lot Fee Charges
- 3 to CEL&P's Appendix B.

4 O19. ARE THE PROPOSED NON-RECURRING CHARGES BASED ON COST OF

5 **SERVICE?**

- 6 A. My recommended Non-Recurring Charges are equal to or less than the calculated cost for
- 7 CEL&P to provide those services. CEL&P provided me with hourly labor and truck costs and
- 8 estimated hours for each type of service. I used this information, as well as information from
- 9 the Cost of Service and Rate Design analyses as presented and discussed in Mr. Mancinelli's
- direct testimony and attachments, to calculate the costs for each type of service as shown in
- 11 Attachment LAT-4.

12 Q20. DID YOU BASE YOUR RECOMMENDED NON-RECURRING CHARGES ON

13 ANY OTHER INFORMATION BEYOND COST OF SERVICE?

- 14 A. Yes. In developing the recommended Non-Recurring Charges, I also analyzed neighboring
- utilities' similar fees and charges to provide a benchmarking check against the fees I have
- proposed. The following table provides a summary of the current and proposed Non-Recurring
- 17 Charges, as well as the costs to CEL&P for providing the services. Attachment LAT-4
- provides the inputs, assumptions, and methodologies used to calculate the costs to CEL&P for
- providing the associated services and summarizes the benchmarking data regarding non-
- 20 recurring fees charged by neighboring utilities.

⁴ See Attachment JAM-4 of the Direct Testimony of Mr. Mancinelli for a copy of the proposed tariff, including non-recurring charges.

Table LAT-2 CEL&P Current and Proposed Non-Recurring Charges and Costs

Type of Charge	Units	CEL&P Current	CEL&P Proposed		CELP Cost
Service Deposit					
Rate Sched RS	Minimum \$/Deposit1	\$ 50.00	\$ 60.00	\$	60.00
Rate Sched GP, PP, and IP	Minimum \$/Deposit ²	\$ 100.00	\$ 120.00	\$	120.00
Return Check Charge	\$/Returned Check3	\$ 25.00	\$ 25.00	\$	23.77
Reconnect/Disconnect Charge					
During normal Utilty hours	\$/Reconnect or Disconnect	\$ 40.00	\$ 45.00	\$	98.17
Outside normal Utility hours	\$/Reconnect or Disconnect	\$ 100.00	\$ 120.00	\$	127.26
Temporary Service Charge	\$/Temporary Service4	\$ 100.00	\$ 150.00	\$	247.06
Meter Test Charge	\$/Meter Test⁵	\$ 40.00	\$ 50.00	\$	214.51
Service Call Charge					
Outside normal Utility hours	\$/Service Call	\$ 200.00	\$ 250.00	\$	534.56
Late Payment Charge	% of Unpaid Balance	4%	5%		5%
Meter Base Charge					
Residential Customers	\$/Meter Base	NA	\$ 50.00	\$	50.00
Commercial Customers	\$/Meter Base	NA	\$ 100.00	C	ver \$100.00
Electric Permit Fee	\$/Permit	NA	\$ 50.00	\$	908.32
Lot Fee	\$/Lot ⁶	 NA	\$ 1,000.00	\$	1,000.00

Minimum for Residential Service to a maximum of 2 months anticipated usage. The actual amount shall be based on the results of a credit check.

3

5

6

4 Q21. ARE YOUR RECOMMENDED NON-RECURRING CHARGES REASONABLE

AS COMPARED TO THE ESTIMATED COST OF SERVICE AND IN COMPARISON

TO NEIGHBORING UTILITIES?

Minimum for General Power, Primary Power, and Industrial Power Service. The actual amount shall be based on the results of a credit check.

For the current charge, the greater of \$25.00 or 5% (but not more than \$250) of the amount of the check. For the proposed charge, the greater of \$25.00 or 6% (but not more than \$250) of the amount of the check.

When no more than a single span service drop and meter are required.

⁵ If customer requests a meter test less frequently than in a 36-month period and upon test, the meter accuracy is less than 3% error

⁶ Based on 8 years to recover investment.

1	A. Yes. As shown in in Attachment LA1-4, the recommended Non-Recurring Charges are in-line
2	or less than the cost of service, and are similar to or in the range of fees assessed by neighboring
3	utilities for similar services.
4	V. LIGHTING RATE DESIGN
5	Q22. GENERALLY, HOW WERE THE PROPOSED FIXTURE CHARGES FOR NON-
6	LED LIGHTS SHOWN IN MR. MANCINELLI'S ATTACHMENT JAM-4
7	DETERMINED?
8	A. For non-LED lights, across-the-board adjustments were made to current fixture charges for the
9	Street Lighting, Outdoor Lighting, and Traffic Signals classes based on the revenue targets by
10	phase-in period as identified for these classes as part of the overall rate design. These revenue
11	targets are discussed in Mr. Mancinelli's direct testimony on rate design and shown in
12	Attachment JAM-4.
13	Q23. GENERALLY, HOW WERE THE PROPOSED FIXTURE CHARGES FOR
14	STREETLIGHT LED LIGHTS DEVELOPED?
15	A. CEL&P currently has LED streetlighting rates, but we updated them for purposes of the filing
16	The following table summarizes the approach used to design the proposed LED streetlight
17	rates. More details are provided in Attachment LAT-5. First, the per fixture operating costs
18	for the HPS streetlights by wattage and the equivalent LED streetlights by equivalent wattage
19	were calculated based on the cost-of-service results in Attachment JAM-2. These operating
20	costs are shown in Lines 1 and 2 of following table.

- demand and energy basis (i.e., dollar per kW charge and dollar per kWh charge, respectively).
- 2 This is consistent with how CEL&P charges base rates. The Primary Power Service base rate
- 3 schedule is currently the only rate schedule for which both demand and energy charges are
- 4 assessed as part of their base rates.

5 Q13. ARE YOU PROPOSING ANY UPDATES TO CEL&P'S CURRENT ECA MODEL?

- 6 A. Yes. As discussed in Mr. Mancinelli's direct testimony, CEL&P is proposing to assess both
- 7 demand and energy charges as part of their base rates to both the General Power Service and
- 8 Municipal Power Service rate schedules. Consistent with these proposed changes to CEL&P's
- base rates, I am proposing that CEL&P assess both demand and energy ECA rates to the
- General Power Service and Municipal Power Service rate schedule category. ECA rates for
- the other categories of rate schedules would continue to be charged on an energy basis only.

12 Q14. HAVE YOU DEVELOPED A RECOMMENDED ECA MODEL THAT

- 13 INCORPORATES THESE CHANGES?
- 14 A. Yes, the updated model is provided in Attachment LAT-3.

15 <u>III. ADJUSTMENT 2 TO THE REVENUE REQUIREMENT STUDY</u>

- 16 Q15. PLEASE EXPLAIN THE BASIS OF ADJUSTMENT 2 TO THE REVENUE
- 17 REQUIREMENT STUDY FOR PURCHASED POWER COSTS.
- 18 A. During the test year period, actual IMPA rates that were in effect from March through
- December 2019 differed from those in effect during January and February 2020. Therefore,
- 20 purchased power costs were adjusted to reflect a full year at the IMPA rates that became
- 21 effective January 1, 2020. The following table summarizes the inputs and calculations used to
- adjust the purchased power costs.

1 2

Table LAT-3 Proposed LED Streetlighting Fixture Charges

			Α	\$,	B /Fixture		С
Line	HPS Streetlights	100) W HPS	25	0 W HPS	400) W HPS
No.	Equivalent LED Streetlights	47	W LED	81	W LED	142	W LED
1	HPS COS SL Operating Costs	\$	11.66	\$	13.09	\$	15.24
2	Equiv LED COS SL Operating Costs	\$	9.19	\$	9.85	\$	10.93
3	Difference (LED SL Costs Minus HPS SL Costs)	\$	(2.47)	\$	(3.24)	\$	(4.31)
4	Proposed Phase 2 HPS SL Fixture Charges	\$	6.80	\$	27.55	\$	45.03
5	Less Difference in LED SL vs HPS SL Operating Costs	\$_	(2.47)	\$	(3.24)	\$	(4.31)
6	Proposed LED SL Fixture Charges	\$	4.33	\$	24.31	\$	40.72

The differences in operating costs for the LED and HPS streetlights were then calculated as shown in the above table on Line 3. These differences were then applied to the proposed Phase 2 HPS streetlight fixture charges to determine the proposed LED streetlight fixture

charges as shown in Lines 4 through 6 of the above table. Line 6 in the above table shows

8 the proposed LED streetlighting fixture charges.

Q24. GENERALLY, HOW WERE THE PROPOSED FIXTURE CHARGES FOR LED

OUTDOOR LED LIGHTING DEVELOPED?

A. CEL&P currently does not have any LED outdoor lighting rates, but they were developed as part of this filing. A very similar rate design process was used for LED outdoor lights as for LED streetlights. The following table summarizes the approach used to design the proposed LED outdoor lighting rates. More details are provided in Attachment LAT-5. First, the per fixture operating costs for the HPS outdoor lights by wattage and the equivalent LED outdoor lights by equivalent wattage were calculated based on the cost-of-service results in Attachment JAM-2. These operating costs are shown in Lines 1 and 2 of following table.

1 2

Table LAT-4 Proposed LED Outdoor Lighting Fixture Charges

			Α		В		С
				\$,	/Fixture		
Line	HPS Outdoor Lights	100	W HPS	25	0 W HPS	400) W HPS
No.	Equivalent LED Outdoor Lights	47	W LED	81	W LED	142	W LED
1	HPS COS OL Operating Costs	\$	4.29	\$	5.71	\$	7.84
2	Equiv LED COS OL Operating Costs	\$	3.27	\$	3.93	\$	5.00
3	Difference (LED OL Costs Minus HPS OL Costs)	\$	(1.01)	\$	(1.78)	\$	(2.84)
4	Proposed Phase 2 HPS OL Fixture Charges	\$	4.97	\$	12.81	\$	34.85
5	Less Difference in LED OL vs HPS OL Operating Costs	\$	(1.01)	\$	(1.78)	\$	(2.84)
6	Proposed LED OL Fixture Charges	\$	3.96	\$	11.03	\$	32.01

3 4

- The differences in operating costs for the LED and HPS outdoor lights were then calculated
- as shown in the above table on Line 3. These differences were then applied to the proposed
- 6 Phase 2 HPS outdoor lighting fixture charges to determine the proposed LED streetlight
- fixture charges as shown in Lines 4 through 6 of the above table. Line 6 in the above table
- 8 shows the proposed LED outdoor lighting fixture charges.

9

VI. SUMMARY AND CONCLUSIONS

10 Q25. PLEASE PROVIDE A SUMMARY OF YOUR RECOMMENDATIONS.

- 11 A. I recommend that the IURC approve the following as identified earlier in my testimony:
- 1) Proposed changes to the calculation of future ECA rates for CEL&P;
- 2) Proposed Non-Recurring Charges; and
- 14 3) Proposed LED fixture charges for streetlighting and outdoor lighting.

15 Q26. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

16 A. Yes.

VERIFICATION

	I affirm	under th	e penalties	of perjury	that the	foregoing	prefiled	verified	direct	testimon	У
is true	e to the be	st of my	knowledge	, informat	ion and l	oelief as of	the date	here file	ed.		

Laurie A. Tomczyk	

3923716_1



Executive Consultant, Energy Practice ltomczyk@newgenstrategies.net

Ms. Tomczyk has over 30 years of experience in providing management consulting services to clients involved in the electric power, water, and solid waste management industries. She specializes in electric utility revenue requirement analyses, cost of service and rate design studies, financial projections, expert witness services, and other engineering and economic analyses. Her rate-related projects have included studies to develop retail electric, retail water, transmission, ancillary service, standby, and special contract rates. She also has experience in net energy metering, decoupling, and opt-out programs.

Ms. Tomczyk has provided expert witness testimony on revenue requirement cost of service issues before public utility commissions, and she has provided other types of cost of service and rate-related litigation support. She has been an instructor on behalf of Electric Utility Consultants, Inc. for courses on cost of service concepts and techniques and rate design for electric utilities.

Ms. Tomczyk joined NewGen Strategies & Solutions as an Executive Consultant in 2014. Prior to joining the firm, she provided utility consulting services while employed at R. W. Beck, Inc. and its successor firm, SAIC, for 25 years.

EDUCATION

Bachelor of Science in Mechanical Engineering, University of Nebraska

PROFESSIONAL REGISTRATIONS/CERTIFICATIONS

Registered Professional Engineer (PE), Mechanical, Colorado

KEY EXPERTISE

- Revenue Requirements
- Cost of Service and Rate Design
- Expert Witness and Litigation Support
- Financial Projections
- Engineering/Economic Analyses
- Depreciation Studies

RELEVANT EXPERIENCE

Revenue Requirement, Cost of Service, and Rate Design

Ms. Tomczyk leads and participates in retail revenue requirement, cost of service, and rate design studies for electric utilities. The services she provides include development of historical and projected revenue requirements and the development of detailed cost of service and rate design models. Ms. Tomczyk has utilized numerous cost allocation methods and compared the revenue requirements under the various cost of service methods in order to evaluate the most appropriate cost of service methodologies for specific clients.

Additionally, Ms. Tomczyk has worked on diverse ratemaking issues such as standby service rates, net energy metering rates, wheeling rates, feed-in tariffs, and cost of service levels. She has used projected test year analyses to assess revenue requirements; assessed the cost of service changes for multiple customer classes; developed new rates for customer classes based on pre-defined overall percentage rate increases; and determined whether a return on rate base or Times Interest Earned Ratio should be used for ratemaking purposes. A sample listing of Ms. Tomczyk's cost of service and rate design clients by service offering is shown below.

Economics | Strategy | Stakeholders | Sustainability www.newgenstrategies.net

Executive Consultant, Energy Practice

Electric Revenue Requirement, Unbundled Cost of Service Analysis, and Rate Design Studies

- United Power Electric Cooperative, Colorado
- Golden Valley Electric Cooperative, Alaska
- Homer Electric Association, Alaska
- Bryan Texas Utilities, Texas
- Brownsville Public Utilities Board, Texas
- Kaua'i Island Utility Cooperative, Hawai'i
- BC Hydro, British Colombia, Canada
- Lafayette Utilities System, Louisiana
- Cleveland Public Power, Ohio
- CPS Energy, Texas

- Tri-State Generation & Transmission Association, Inc., Colorado
- Austin Energy, Texas
- Farmington Electric Utility System, New Mexico Water and Electric Board, Oregon
- Garland Power & Light, Texas
- United Power Electric Cooperative, Colorado
- Guam Power Authority, Guam
- U.S. Army, California, Georgia, New York, and Virginia
- Fayetteville Public Works Commission, North Carolina

Competitive Retail Rate Assessments

■ Garland Power and Light, Texas

Brownsville Public Utilities Board, Texas

Electric Transmission and Ancillary Service Rates

- Golden Valley Electric Cooperative, Alaska
- Homer Electric Association, Alaska
- Lubbock Power & Light, Texas
- Brownsville Public Utilities Board, Texas
- Greenville Electric Utility System, Texas

Net Energy Metering and Standby Rates

- Kaua'i Island Utility Cooperative, Hawai'i
- Homer Electric Association, Alaska
- Golden Valley Electric Cooperative, Alaska
- Madisonville Municipal Utilities, Kentucky

Electric Special Contract Rates

Homer Electric Association, Alaska

 Alaska Golden Valley Electric Cooperative, Alaska

Electric Decoupling Programs

Kaua'i Island Utility Cooperative, Hawai'i

Guam Power Authority, Guam

Opt-Out Program Associated with Advanced Electric Metering Infrastructure Project

■ Kaua'i Island Utility Cooperative, Hawai'i

Expert Witness and Litigation Support

Ms. Tomczyk offers expert testimony regarding cost of service, rate design and ratemaking issues before local and state regulatory bodies and courts. She has developed revenue requirements, rate base, cost of service analysis, and rate design and associated testimony to be filed with state commissions; including design of retail, transmission, and ancillary services rates. She has developed a standby rate report filed with the state commission as part of the standby rate service tariff filing. She has provided written testimony and other litigation support on behalf of clients pertaining to their revenue requirements, cost of service studies, and equity management plans.

Executive Consultant, Energy Practice

Additionally, Ms. Tomczyk has developed comments provided on behalf of a customer associations related to a state commission's investigation to analyze the strengths and weaknesses of marginal cost of service studies, embedded cost of service studies, the reconciliation process, and how this impacts rate classes. She has also reviewed wholesale energy provider's unbundled financial statements, calculation of equipment, projected wholesale customer patronage capital accruals, and estimated rate impacts associated with the wholesale utility's proposed construction of a new generation plant. Ms. Tomczyk has provided testimony and other types of litigation support for the following clients:

- Golden Valley Electric Cooperative, Alaska
- Homer Electric Association, Alaska
- Guam Power Authority, Guam
- B.C. Hydro, British Columbia
- SABIC Innovative Plastics, Indiana

- Kaua'i Island Utility Cooperative, Hawai'i
- Nevada Resorts Association, Nevada
- Tri-State Generation & Transmission Association, Inc., Colorado
- U.S. Army, Texas and New York

Financial Projections

Ms. Tomczyk is responsible for the development of financial and economic analyses for utility clients. Many of these analyses have been presented before regulatory commissions in support of general rate case applications, and in particular in support of the revenue requirements in the applications. She has also developed equity management plans for electric cooperatives, pro forma and other financial analyses. Her financial project clients include:

- Golden Valley Electric Cooperative, Alaska
- Guam Power Authority, Guam
- Brownsville Public Utilities Board, Texas
- Kaua'i Island Utility Cooperative, Hawai'i
- City of Indianapolis, Indiana

- Lafayette Utilities System, Louisiana
- Georgetown Municipal Water and Server Service, Kentucky
- St. Joseph Power & Light, Missouri
- Homer Electric Association, Alaska
- CPS Energy, Texas

Depreciation

Ms. Tomczyk performs analyses on depreciation studies for municipal and cooperative utility clients. She developed a replacement planning model using survivor curve methodology to estimate the level of future replacement costs for electric utility systems at nine military bases that are operated and maintained under contract by City Light & Power, Inc. She has also been involved in the development of depreciation studies for the Kauai Island Utility Cooperative, Navajo Tribal Utility Authority, and Los Angeles Department of Water and Power. Ms. Tomczyk is a member of the Society of Depreciation Professionals (SDP) and has completed training courses offered by SDP. These training classes included topics such as data requirements and collection, unit versus group accounting, depreciation models, actuarial and simulation life analyses, salvage and cost of removal analyses, and technology forecasting. She is working towards becoming a Certified Depreciation Professional through SDP.

WORKSHOPS AND PRESENTATIONS

Ms. Tomczyk has served as an instructor on behalf of Electric Utility Consultants, Inc. (EUCI) for the following courses:

 Introduction to Cost of Service Concepts and Techniques for Electric Utilities Introduction to Rate Design for Electric Utilities

She has also made the following presentations at the Michigan Municipal Electric Association Annual Conference:

Executive Consultant, Energy Practice

- Standby Rates for Distributed Generation
- Using AMI Data for Cost-of-Service and Rate Design Analyses, Resource Planning, and Financial Planning
- Balancing Aging Infrastructure, Rates, and Residential Demand

Record of Testimony Submitted by Laurie A. Tomczyk

Utility	Proceeding	Subject of Testimony	Before	Client	Date
Richmond Power & Light	Cause No. 45361	Revenue Requirement	Indiana Utility Regulatory Commission	Richmond Power & Light	3/2020
Vectren Energy of Indiana	Docket No. 43354 – MCRA 21	MISO Cost and Revenue Adjustment Tracker	Indiana Utility Regulatory Commission	SABIC Innovative Plastics Mount Vernon, LLC	12/2017
El Paso Electric Company	Docket No. 46831	Cost of Service and Rate Design Studies	Public Utility Commission of Texas	U.S. Department of Defense and all other Federal Executive Agencies	06/2017 07/2017
Golden Valley Electric Association	Docket No. U-17-007	Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Golden Valley Electric Association	12/2016 08/2017
Homer Electric Association	Docket No. U-15-141	Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Homer Electric Association	10/2015 09/2016
Homer Electric Association	Docket No. U-13-203	Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Homer Electric Association	05/2014 06/2014 09/2014 02/2015
Homer Electric Association	Docket No. U-10-97	Revenue Requirement and Cost of Service Study	Regulatory Commission of Alaska	Homer Electric Association	10/2010
Chugach Electric Association	Docket No. U-09-80	Revenue Requirement and Cost of Service Study	Regulatory Commission of Alaska	Homer Electric Association	2/2010
Kauaʻi Island Utility Cooperative	Docket No. 2009- 0050	Cost of Service Study and Standby Rate Development	Hawai'i Public Utilities Commission	Kauaʻi Island Utility Cooperative	6/2009
Golden Valley Electric Association	Docket No. U-08-139	Cost of Service Study and Transmission and Ancillary Service Rates Development	Regulatory Commission of Alaska	Golden Valley Electric Association	9/2008
Chugach Electric Association	Docket No. U-06-134	Unbundled Financial Statements, Calculation of Equity, Patronage Capital Accruals, and Rate Impacts Due to New Generation	Regulatory Commission of Alaska	Homer Electric Association	3/2007

Lexis Advance® Research

Document: 1989 Ind. PUC LEXIS 427

1989 Ind. PUC LEXIS 427

Copy Citation

Indiana Utility Regulatory Commission

December 13, 1989, Approved

CAUSE NO. 36835-S3

Reporter

1989 Ind. PUC LEXIS 427 *

In the Matter of the Indiana Municipal Power Agency and the Indiana Cities and Towns, Members Thereof, to Modify, Simplify and Make More Equitable Certain Tracking Procedures Heretofore Authorized By This Commission to Track Increases or Decreases in the Cost of Purchased Power and Energy by Such Members From the Indiana Municipal Power Agency

Core Terms

track, energy, estimate, base rate, municipality, notice, retail

Panel: Monk, Bailey, Corban, O'Lessker and Zagrovich concur

Opinion By: Frederick L. Corban, Commissioner; Scott R. Jones, Assistant Chief Administrative Law Judge

Opinion

The Indiana cities and towns of Anderson, Bargersville, Centerville, Covington, Crawfordsville, Edinburgh, Flora, Frankfort, Frankton, Greendale, Greenfield, Lawrenceburg, Lebanon, Linton, Middletown, Paoli, Pendleton, Peru, Richmond, Rising Sun, Scottsburg, Tipton and Washington (collectively "the Petitioners") filed their petition instituting the above-captioned Cause on July 21, 1989. The petition seeks to modify the energy cost adjustment and power cost tracking procedures and forms approved by this Commission in its May 2, 1984 Order in Cause No. 36836-S2 and to authorize the Petitioners to use the modified procedures and forms in order to secure the Commission's approval of adjustments to their retail rates.

A hearing was held in this Cause at 9:30 A.M., EST, on December 1, 1989. Proper notice was provided as required by law, and the proofs of publication were incorporated into the record by reference. Petitioners and the Office of the Utility Consumer Counselor ("Public") appeared and participated at the hearing. No members of [*2] the general public appeared or participated

During the hearing on December 1, 1989, Petitioners offered into evidence, without objection, the testimony of L. Gayle Mayo and Donald E. Gimbel as Petitioners' Exhibits LGM and DEG respectively. Petitioners also moved the Commission to take

administrative notice of its October 27, 1982, January 11, 1983 and May 2, 1984 Orders in Cause Nos. 36835, 36835-S1 and 36835-S2 respectively. Petitioner's motion was granted and copies of the notice orders were received into the record of the proceedings in this Cause as part of Petitioners' case-in-chief. The report of the Commission's Engineering Staff, sponsored by Mr. Michael J. Mooney, was received into evidence pursuant to I.C. 8-1-1-5. No rebuttal evidence was offered by Petitioners.

Based upon the applicable law and the evidence herein, the Commission now finds:

- 1. <u>Commission Jurisdiction and Notice</u>. Due, legal and timely notice of the public hearing in this Cause was given and published as required by law. Each of the Petitioners is an Indiana municipality that operates an electric utility system distributing power and energy to industrial, commercial and residential customers [*3] and qualifies as a "municipally owned utility" as defined in I.C. 8-1-2-1. Petitioners are each subject to the jurisdiction of the Commission in the manner and to the extent allowed by the laws of the State of Indiana. The Commission has jurisdiction over the Petitioners and the subject matter of this proceeding.
- 2. <u>Background Findings.</u> Petitioners purchase their power and energy requirements from the Indiana Municipal Power Agency ("IMPA"). In Cause No. 36835, IMPA requested, in addition to other relief, that the Commission approve certain energy cost adjustment and power cost tracking procedures for use by its members that would allow each member to track to its retail customers increases or decreases in the cost of power and energy purchased from IMPA. As shown by the Commission's October 27, 1982 Order in Cause No. 36835, the Commission deferred action on IMPA's request, but created a subdocket (Cause No. 36835-S1) in order to fully explore the use of tracking procedures by IMPA's members.

After a public hearing, the Commission issued on January 11, 1983, its Order in Cause No. 36835-S1 in which it approved certain energy cost adjustment and power cost tracking procedures [*4] for use by IMPA's members and prescribed the use of certain forms reflecting those procedures. The Commission also ordered as part of its Order in Cause No. 36835-S1 that another subdocket (Cause No. 36835-S2) should be established for the purpose of reviewing and evaluating the tracking procedures approved in Cause No. 36835-S1.

After a hearing conducted on March 26, 1984, the Commission issued its Order in Cause No. 36835-S2 on May 2, 1984 and approved the use by IMPA's members of tracking procedures similar to those authorized by the Commission in Cause No. 36835-S1. The Commission also authorized the use of new forms reflecting the newly-approved procedures for the purpose of filing for retail rate adjustments. The new forms included some based on the "One-Part" forms previously approved by the Commission in Cause No. 36835-S1 and, for certain of IMPA's members that had the results of a reliable cost of service study and sufficient billing capability, completely new "Two-Part" forms. The Two-Part forms separate costs into demand and energy components and enable the IMPA members utilizing them to calculate retail rate adjustments for individual rate classes.

The Commission [*5] also found in its May 2, 1984 Order in Cause No. 35835-S2 that any municipality becoming a member of IMPA after the Order in Cause No. 36835-S1 could utilize the One-Part forms that had been approved by the Commission.

The primary purpose of the tracking procedures approved by the Commission for use by IMPA's members was to replace the fuel cost and wholesale power cost tracking procedures with procedures that allowed the energy cost adjustment charges portion of the costs billed by IMPA to its members to be appropriately reconciled on a quarterly basis. That purpose was accomplished under the procedures approved in Cause No. 36835-S2, which IMPA's members now have been using for over five years. However, as a result of their experience, Petitioners believe that the current procedures and forms need to be modified in order to make the use of tracking procedures by IMPA's members more effective and equitable. Accordingly, Petitioners are seeking in this Cause the Commission's approval of, and authorization to use, revised tracking procedures and forms. The revised forms, which reflect the specific procedures that Petitioners are seeking approval of in this Cause, were introduced [*6] into evidence with Ms. Mayo's testimony as Petitioners' Exhibits LGM-1 and LGM-2 and are attached hereto as Exhibits A and B, Exhibit A (LGM-1) is a revised One-Part form and Exhibit B (LGM-2) is a revised Two-Part form.

3. <u>Additional Findings</u>. Although formatted differently, the proposed forms generally provide for a continuation of the methodology and principles reflected in the forms currently in use by IMPA's members. However, the proposed forms treat changes in IMPA's base rates and capacity payments differently than the manner in which they are currently treated.

The present forms used by IMPA's members rely on prior year base rate changes to determine a total annual change in the base cost of purchased power. This method is not completely accurate because the total annual change is determined using previous year billing determinants and the resulting unit costs charges are then multiplied by an estimate of the next quarter's billing determinants. Under the proposed forms each of IMPA's members will calculate per unit changes between its current wholesale power costs and the wholesale power costs reflected in its current rates, and then multiply those changes by the [*7] next quarter's estimated billing determinants. This will result in the calculation of a truer change in the member's costs attributable to IMPA's base rates and lessen, but not eliminate by itself, the possibility that the member will overcollect or undercollect from its retail ratepayers.

To eliminate the possibility of overcollection or undercollection, the proposed forms include a base rate change reconciliation procedure under which each quarter's estimation of the billing determinants used by a member to bill its ratepayers is reconciled with the actual billing determinants used by IMPA to bill the member. Pursuant to the reconciliation procedure, the proposed forms require IMPA's members to take into consideration IMPA's base rates, together with IMPA's energy cost adjustment factor, in determining a quarterly variance between what the member billed its ratepayers and what IMPA billed the member resulting in a dollar for dollar flow through of IMPA's base rates and energy cost adjustment charges.

The proposed forms also reflect a change in regard to the capacity payments of IMPA members that have generating resources. The forms currently in use require an estimation of **[*8]** generating costs and payments for the entire year, beginning January 1, in September of the preceding year. This creates a sizable gap between the date of estimation and the final months of the estimated year. The proposed forms require the use of current estimates of member generating costs and payments from IMPA on a quarterly rather than on a yearly basis. This will also allow the affected IMPA members to more closely track changes in their costs from IMPA.

The data required to complete the proposed forms is very similar to that needed in connection with the present forms. Accordingly, it does not appear that the Petitioners, the Commission's Staff or the Office of the Utility Consumer Counselor will experience any great difficulties in connection with the use of the proposed forms in lieu of those currently in use.

All of the testimony and exhibits introduced in this Cause support, without reservation, the relief Petitioners are seeking.

Attachment LAT-2 to the Direct Testimony of L. Tomczyk

Page 3 of 3

4. <u>Conclusion.</u> The Commission finds the Petitioners' proposed forms, and the tracking procedures that they reflect, are fair, just, reasonable, adequate, non-discriminatory and do not grant any undue preference. Therefore, we find **[*9]** the proposed procedures and forms should be approved for use by Petitioners and all municipalities becoming members of IMPA after July 21, 1989, the date Petitioners filed their petition instituting this Cause.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION, that:

- 1. The energy cost adjustment and power cost tracking procedures that Petitioners have proposed and that are reflected in the forms attached hereto as Exhibit A and B are approved.
- 2. Petitioners and all municipalities becoming members of IMPA after July 21, 1989 shall be and are hereby authorized to use the forms attached hereto as Exhibits A and B in the manner allowed by the Commission's January 11, 1983 Order in Cause No. 36835-S1 and its May 2, 1984 Order in Cause No. 36835-S2.
- 3. The determination of which of the two sets of forms each of the Petitioners shall use shall continue to be governed by the provisions of the Commission's May 2, 1984 Order in Cause No. 36835-S2.
- 4. This Order shall be effective on and after the date of its approval.

EXHIBIT A [SEE ILLUSTRATION IN ORIGINAL]

EXHIBIT B [SEE ILLUSTRATION IN ORIGINAL]

Content Type: Administrative Materials

Terms: 36835-S3

Narrow By: Sources: IN Utility Regulatory Commission Decisions Content Type: Administrative Materials

Date and Time: Jan 08, 2020 10:51:16 a.m. EST



About LexisNexis® Privacy Policy Cookie Policy Terms & Conditions

Sign Out Copyright
© 2020
LexisNexis.
All rights
reserved.

RELX Group"

Print



Crawfordsville Electric Light & Power

P.O. Box 428 • 808 Lafayette Road • Crawfordsville, IN 47933

Phone (765) 362-1900 • Fax (765) 364-8224 • www.celp.com

125 YEARS OF SERVICE

August 17, 2020

<u>Via Electronic Filing – 30 Day Filings – Electric</u>

Mary Becerra Commission Secretary Indiana Utility Regulatory Commission 101 West Washington St., Suite 1500 E Indianapolis, IN 46204

RE: Crawfordsville Electric Light & Power 30 Day Filing Pursuant to 170 IAC 1-6-1 et seq.

Dear Ms. Becerra:

Enclosed please find documents in support of our filing for a 30 Day Filing by Crawfordsville Electric Light & Power pursuant to 170 IAC Rule 6. The purpose of our filing is to implement an average change in the rates for electric service charged by its supplier, Indiana Municipal Power Agency. This request is allowable pursuant to 170 IAC 1-6-3 of Rule 6 because it entails Cause # 36835-2 dated 12-13-1989: a filing for which the commission has already approved or accepted the procedure for the change.

Affected customers have been notified as required under 170 IAC 1-6-6. Notice was published in the Journal Review on _______. In addition, the Legal Notice has been placed on the utility website rates page (www.celp.com) and has been posted in a public place in the Crawfordsville Electric Light & Power customer service office(s). The contact information, including every person who may need to be contacted, regarding this request is:

Mr. Phillip R. Goode
765-362-1900
808 Lafayette Road
P.O. Box 428
Crawfordsville, IN 47933-0428
765/364-8224 (fax) philg@celp.com

The proposed rate adjustment will apply to electric customer bills during the three months of July, August, and September 2021. The average residential customer using 860 kWh will see a of approximately \$0 or 0%.



Crawfordsville Electric Light & Power

P.O. Box 428 • 808 Lafayette Road • Crawfordsville, IN 47933

Phone (765) 362-1900 • Fax (765) 364-8224 • www.celp.com

125 YEARS OF SERVICE

August 17, 2020

Mr. Brad Borum Indiana Utility Regulatory Commission Electricity Division 101 W Washington St., Suite 1500 East Indianapolis, IN 46204-3407

TO THE INDIANA UTILITY REGULATORY COMMISSION

 Crawfordsville Electric Light & Power, 808 Lafayette Rd., Crawfordsville, Indiana, under and pursuant to the Public Service Commission Act, as amended, and Commission Order in Cause No. 36835-S3, hereby files with the Indiana Regulatory Commission for its approval, changes in the schedule of rates for electricity sold as follows:

Residential Service	Decrease of:	\$ -	per kWh
Gen. Power & Municipal Power	Decrease of:	\$ -	per kW
	Decrease of:	\$ -	per kWh
Primary Power Service	Decrease of:	\$ -	per kVA
	Decrease of:	\$ -	per kWh
Outdoor Lighting	Decrease of:	\$ -	per kWh
Street Lighting	Decrease of:	\$ -	per kWh
Traffic Lighting	Decrease of:	\$ -	per kWh

- The accompanying changes in the schedule of rates are based solely upon the changes in the cost of purchased power and energy, purchased by this utility computed in accordance with the Indiana Utility Regulatory Commission Order in Cause No. 36835-S3, dated December 13, 1989.
- 3. All of the matters and facts stated herein and in the attached exhibits are true and correct. If approved, this change of rate shall take effect for the bills to be rendered beginning with the July 2021 billing cycle.

BY:		
	Phillip R. Goode	

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

PRG/kc Enclosure

Page 2

Ms. Mary Beccera

RE: Crawfordsville Electric Light & Power

30 Day Filing Pursuant to 170 IAC 1-6-1 et seq.

Attached are the applicable tariff sheets and/or all working papers supporting this filing. I verify that notice has been provided as stated in this letter and that this letter and the attached documents are true and accurate to the best of my knowledge, information and belief. Please feel free to contact our office if there are any questions concerning any of the documents provided. Thank you for your assistance with this 30 Day Filing.

Yours truly,

Phillip R. Goode Manager

Attachments

STATE OF INDIANA	
) SS:
COUNTY OF MONTGOMER	RY)
Personally appeared before me,	a Notary Public in and for said county and state, this day
of2021, Phil	lip R. Goode, who after having been duly sworn according to law, stated
that he or she is an officer of Cr	awfordsville Electric Light & Power, Crawfordsville, Indiana, that he or
she has read the matters and fac	ts stated above, and in all exhibits attached hereto, and that the same are
true; that he or she is duly autho	orized to execute this instrument for and on behalf of the applicant herein.
	Andrea McArthur
My Commission Expires:	Notary Public
August 8, 2024	My County of Residence: Montgomery

CRAWFORDSVILLE ELECTRIC LIGHT & POWER Crawfordsville, Indiana

Proposed Rate Adjustment Applicable to the 3rd Quarter 2021 and Supporting Schedules

For use with rates approved under IURC Cause No. 44684 July, August, and September, 2021

LEGAL NOTICE

Crawfordsville Electric Light & Power has made a filing for a purchase power and energy tracking factor with the Indiana Utility Regulatory Commission in order to implement an average change in its rates for electric service charged by its supplier, Indiana Municipal Power Agency, pursuant to the Indiana Utility Regulatory Commission Order in Cause Number 36835-S3. The filing, if approved by the Commission, will be effective for energy consumed on or after the date of approval.

Rate RS	\$ -	per kWh
Rate GP & MP	\$ -	per kW
Rate GP & MP	\$ -	per kWh
Rate PP	\$ -	per kVA
Rate PP	\$ -	per kWh
Rate OL	\$ -	per kWh
Rate SL	\$ -	per kWh
Rate TS	\$ -	per kWh

Applicable: July, August and September, 2021

Any objection to this filing may be addressed to the following:

Indiana Office of Utility Consumer Counselor (OUCC)
115 W. Washington St., Suite 1500 South
Indianapolis, IN 46204
Toll Free: 1-888-441-2494
Voice/TDD: (317) 232-2494
Fax: (317) 232-5923

www.in.gov/iurc

Indiana Utility Regulatory Commission (IURC)
101 W. Washington St., Suite 1500 East
Indianapolis, IN 46204
Toll Free: 1-800-851-4268
Voice/TDD: (317) 232-2701

Fax: (317) 233-2410 www.in.gov/iurc

<u>CRAWFORDSVILLE ELECTRIC LIGHT & POWER</u> Crawfordsville, Indiana

Appendix A

Rate Adjustments

The Rate Adjustments shall be on the basis of a Purchase Power Cost Adjustment Tracking Factor occasioned solely by changes in the cost of purchased power and energy, in accordance with the Order of the Indiana Utility Regulatory Commission, approved December 13, 1989 in Cause No. 36835-S3, as follows:

Rate Adjustments applicable to the below listed Rate Schedules are as follows:

Residential Service (RS)	\$ -	per KWH
Gen. Power & Municipal Power (GP & MP)	\$ -	per KW
	\$ -	per KWH
Primary Power Service (PP)	\$ -	per KVA
	\$ -	per KWH
Outdoor Lighting (OL)	\$ -	per KWH
Street Lighting (SL)	\$ -	per KWH
Traffic Lighting (TS)	\$ _	per KWH

Applicable: July, August and September, 2021

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

Crawfordsville, Indiana

Appendix B

Rate Adjustments applicable to the below listed Rate Schedules are as follows:

Residential Service	RS	\$ -	per KWH
Gen. Power & Municipal Power	GP & MP	\$ -	per KW
		\$ -	per KWH
Primary Power Service	PP	\$ -	per KVA
		\$ -	per KWH
Outdoor Lighting	OL	\$ -	per KWH
Street Lighting	SL	\$ -	per KWH
Traffic Lighting	TS	\$ -	per KWH

Average Change in Schedule of Rates:

Residential Service	RS	Decrease	\$ -	per KWH
Gen. Power & Municipal Power	GP & MP	Decrease	\$ -	per KW
		Decrease	\$ -	per KWH
Primary Power Service	PP	Decrease	\$ -	per KVA
		Decrease	\$ -	per KWH
Outdoor Lighting	OL	Decrease	\$ -	per KWH
Street Lighting	SL	Decrease	\$ _	per KWH
Traffic Lighting	TS	Decrease	\$ -	per KWH

Applicable: July, August and September, 2021

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF INCREMENTAL CHANGE IN BASE RATE

NO.	DESCRIPTION			DEMAND RELATED	ENERGY RELATED	LINE NO.
1	BASE RATE EFFECTIVE	01-Jan-21	(a)	\$26.217	\$0.028875	1
2	BASE RATE EFFECTIVE	01-Jan-20	(b)	\$22.957	\$0.026390	2
3	INCREMENTAL CHANGE I	N BASE RATE	Ē (c)	\$3.260	\$0.002485	3

⁽a) IMPA rate effective for the period covered by this filing. The Base Rate includes the applicable Delivery Voltage Adjustment.

⁽b) Base purchased power rate including Voltage Adjustment effective at the time of the member's last approved rate case was filed or January 27, 1983, whichever is more recent.

⁽c) Line 1 - Line 2

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

ESTIMATION OF SAVINGS FROM DEDICATED CAPACITY PAYMENTS FOR THE THREE MONTHS OF:

	Jul-21	Aug-21	Sep-21		
LINE NO.	DESCRIPTION		DEMAND RELATED		LINE NO.
1	ESTIMATED MONTHLY GENERATING	COSTS (h)	\$0.00		1
2	LESS: MONTHLY GEN COSTS IN BASE	RATES (i)	\$0.00		2
3	EST GENERATING COSTS IN TRACKE	R (a)	\$0.00		3
4	EST MONTHLY PAYMENT FROM IMPA	(f)	\$0.00		4
5	LESS: MONTHLY PAYMENTS IN BASE	RATES (g)	\$0.00		5
6	EST CAPACITY PAYMENTS IN TRACKE	ER (b)	\$0.00	NOT APPLICABLE	6
7	ESTIMATED MONTHLY COSTS/(SAVIN	GS) (c)	\$0.00		7
8	ESTIMATED AVERAGE MONTHLY KW	(d)	69,938		8
9	ESTIMATED COSTS/(SAVINGS) PER K	W (e)	\$0.0000		9

Note: The CEL&P Plant was sold as of 12/30/2013 - No cost is estimated for this quarter. Approved as part of last CEL&P IURC Rate Case Cause #43773 dated 7/28/10.

- (a) Line 1 Line 2
- (b) Line 4 Line 5
- (c) Line 3 Line 6 Times The Number Of Years Since Last Cost Of Service Study
- (d) Exhibit III, Column E, Line 1
- (e) Line 7 divided by Line 8
- (f) Capacity Payments Forecasted by Indiana Municipal Power Agency
- (g) Average capacity payments for 12 months ending Month/Year
- (h) Estimated Generating Costs (CEL&P no longer receives monthly payment.)
- (i) Average generating cost for 12 months ending Month/Year

Attachment LAT-3 to Direct Testimony of L. Tomczyk New ECA Model for CEL&P - Page 11 of 28 Exhibit III

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

ESTIMATION OF ENERGY COST ADJUSTMENT FOR THE THREE MONTHS OF:

Jul-21

Aug-21

Sep-21

LINE NO.	DESCRIPTION PURCHASED POWER FROM IMPA	<u>Jul-21</u> (A)	Aug-21 (B)	Sep-21 (C)	TOTAL (D)	ESTIMATED 3 MONTH AVERAGE (E)	LINE NO.
1	KW DEMAND	72,847	66,600	70,367	209,814	69,938	1
2	KWH ENERGY	40,201,261	37,570,660	34,754,299	112,526,220	37,508,740	2
	INCREMENTAL PURCHASED POWER COSTS						
	DEMAND RELATED						
3	ECA FACTOR PER KW	(3.260)	(3.260)	(3.260)	(4000 000 04)	(3.260)	3
4	CHARGE (a)	(\$237,481.22)	(\$217,116.00)	(\$229,396.42)	(\$683,993.64)	(\$227,997.88)	4
	ENERGY RELATED						
5	ECA FACTOR PER KWH	(0.002485)	(0.002485)	(0.002485)		(0.002485)	5
6	CHARGE (b)	(\$99,900.13)	(\$93,363.09)	(\$86,364.43)	(\$279,627.66)	(\$93,209.22)	6

⁽a) Line 1 times Line 3 (b) Line 2 times Line 5

per KW

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF DEMAND RATE ADJUSTMENT FOR RATE SCHEDULE PP For the Three Months of: July, August, and September 2021

LINE NO.	Demand Related Adjustmen	t Factors		LINE NO.
	Rate PP			
1 2 3 4	From Attachment B, Page 3 of 3, Column C, Line 3 From Attachment B, Page 2 of 3, Column C, Line 3 Line 1 divided by Line 2 Line 3 multiplied by 85.601% *	\$ \$	\$0.00 44,587.50 kW - -	1 2 3 4
5	Demand Related Rate Adjustment Factor	\$	- per KVA	5
* Average	Power Factor of the PP class. Rate GP & MP			
1 2 3 4	From Page 3 of 3, Column C, Line 2 From Page 2 of 3, Column C, Line 2 Line 1 divided by Line 2 Line 3 multiplied by 48.102% *	\$ \$	\$0.00 9,205.10 kW - -	

^{*} Average Power Factor of the GP & MP classes.

Demand Related Rate Adjustment Factor

5

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF RATE ADJUSTMENT FOR THE THREE MONTHS OF

Jul-21

Aug-21

Sep-21

0.9555326

LINE NO.	DESCRIPTION	DEMAND RELATED (A)	ENERGY RELATED (B)	LINE NO.
1	INCREMENTAL CHANGE IN BASE RATE (a)	\$3.260	\$0.002485	1
2	ESTIMATED SAVINGS (LOSS) FROM DEDICATED CAPACITY PAYMENTS (b)	\$0.000		2
3	ESTIMATED PURCHASED POWER ENERGY COST ADJUSTMENT (c)	(\$3.260)	-\$0.002485	3
4	ESTIMATED TOTAL CHANGE IN PURCHASED POWER RATE	\$0.000	\$0.000000	4
5	EST CHANGE IN PURCHASED POWER RATE ADJ FOR LOSSES & GR INCOME TAX (d)	\$0.0000	\$0.000000	5
6	PLUS TRACKING FACTOR EFFECTIVE PRIOR TO JANUARY 27, 1983 (e)	\$0.000	\$0.000000	6
7	ESTIMATED TOTAL RATE ADJUSTMENT	\$0.000	\$0.000000	7
8	ESTIMATED AVERAGE BILLING UNITS (f)	69,938	37,508,740	8
9	ESTIMATED INCREMENTAL CHANGE IN PURCHASED POWER COST (g)	\$0.00	\$0.00	9

⁽a) Exhibit I, Line 3

⁽b) Exhibit II, Line 9

⁽c) Exhibit III, Column E, Lines 3 and 5

⁽d) Line 4 divided by (1 - line loss factor)(0.986)

⁽e) Tracking Factor effective prior to January 27, 1983. This factor is zero if new rates have been filed and approved since January 27, 1983.

⁽f) Exhibit III, Column E, Lines 1 and 2

⁽g) Line 7 times Line 8

Attachment LAT-3 to Direct Testimony of L. Tomczyk New ECA Model for CEL&P - Page 14 of 28

Attachment B Page 2 of 3

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF RATE ADJUSTMENT FOR THE THREE MONTHS OF:

				Jul-21	Aug-21	Sep-21			
LINE NO.	RATE SCHEDULE	KW DEMAND ALLOCATOR (%) (a) (A)	KWH ENERGY ALLOCATOR (%) (a) (B)	ALLOCATED ESTIMATED KW PURCHASED (b) (C)	ALLOCATED ESTIMATED KWH PURCHASED (c) (D)		HANGE IN PURCHASED LOSSES & GROSS RE ENERGY (e) (F)		LINE NO.
1	RS	23.059%	21.684%	16,127.3	8,133,221	\$0.00	\$0.00	\$0.00	1
2	GP & MP	13.162%	11.576%	9,205.1	4,342,133	\$0.00	\$0.00	\$0.00	2
3	PP	63.753%	66.127%	44,587.5	24,803,332	\$0.00	\$0.00	\$0.00	3
4		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	4
5	OL	0.000%	0.273%	0.0	102,476	\$0.00	\$0.00	\$0.00	5
6	SL	0.000%	0.307%	0.0	114,975	\$0.00	\$0.00	\$0.00	6
7		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	7
8		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	8
9	TS	0.026%	0.034%	18.1	12,603	\$0.00	\$0.00	\$0.00	9
10 11		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	10
12	TOTAL	100.000%	100.000%	69,938.0	37,508,740	\$0.00	\$0.00	\$0.00	13

⁽a) Taken From Exhibit VI.

⁽b) Page 1 of 3, Column A, Line 8 times Page 2 of 3, Column A

⁽c) Page 1 of 3, Column B, Line 8 times Page 2 of 3, Column B

⁽d) Page 1 of 3, Column A, Line 9 times Page 2 of 3, Column A

⁽e) Page 1 of 3, Column B, Line 9 times Page 2 of 3, Column B

Attachment B Page 3 of 3

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF RATE ADJUSTMENT FOR THE THREE MONTHS OF:

Jul-21

Aug-21

Sep-21

				TOTAL CHANG	GE IN PURCHASED PO	OWER COST				
LINE	RATE	PLUS VARIA	ANCE (a)	ADJ FOR LINE	LOSSES & GROSS RE	CEIPTS TAX	RATE ADJUSTMENT FACTOR PER KWH (d)			LINE
NO.	SCHEDULE	DEMAND	ENERGY	DEMAND (b)	ENERGY (c)	TOTAL	DEMAND	ENERGY	TOTAL	NO.
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
1	RS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	1
2	GP & MP	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	2
3	PP	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	3
4		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	4
5	OL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	5
6	SL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	
7		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	6
8		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	7
9	TS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	
10		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	
11										
12	TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0.000000	0.000000	0.000000	10

⁽a) Exhibit IV, Page 4 of 7, Columns D and E divided by (1 - loss factor)(.986) =

0.9555326

⁽b) Page 2 of 3, Column E plus Page 3 of 3, Column A

⁽c) Page 2 of 3, Column F plus Page 3 of 3, Column B
(d) Page 3 of 3, Columns C, D and E divided by Page 2 of 3, Column D

⁽f) See Attachment (B)

Exhibit IV Page 1 of 7

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

RECONCILIATION OF VARIANCES FOR THE THREE MONTHS OF

Jan-21

Feb-21

Mar-21

LINE NO.	DESCRIPTION	DEMAND RELATED (A)	ENERGY RELATED (B)	LINE NO.
1	INCREMENTAL CHANGE IN BASE RATE (a)	\$3.260	\$0.002485	1
2	ACTUAL SAVINGS FROM DEDICATED CAPACITY PAYMENTS (b)	\$0.000		2
3	ACTUAL PURCHASED POWER ENERGY COST ADJUSTMENT (c)	(\$3.260)	(\$0.002485)	3
4	TOTAL RATE ADJUSTMENT (d)	\$0.000	\$0.000000	4
5	ACTUAL AVERAGE BILLING UNITS (e)	55,495	32,679,935	5
6	ACTUAL INCREMENTAL CHANGE IN PURCHASED POWER COST (f)	\$0.00	\$0.00	6

⁽a) Attachment 1, Page 1 of 3, Line 1 of Tracker filing for the three months of:

Jan-21

Feb-21

Mar-21

⁽b) Exhibit IV, Page 5 of 7, Column E, Line 9

⁽c) Exhibit IV, Page 6 of 7, Column E, Lines 3 and 5

⁽d) Sum of Lines 1 through 4

⁽e) Exhibit IV, Page 6 of 7, Column E, Lines 1 and 2

⁽f) Line 5 times Line 6

Attachment LAT-3 to Direct Testimony of L. Tomczyk New ECA Model for CEL&P - Page 17 of 28

Exhibit IV Page 2 of 7

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

RECONCILIATION OF VARIANCES FOR THE THREE MONTHS OF:

Jan-21

Feb-21

Mar-21

LINE	RATE	KW DEMAND ALLOCATOR	KWH ENERGY ALLOCATOR	ALLOCATED ACTUAL KW	ALLOCATED ACTUAL KWH	INCREMENTAL CH	HANGE IN PURCHASED	POWER COST	LINE
NO.	SCHEDULE	(%) (a)	(%) (a)	PURCHASED (b)	PURCHASED (c)	DEMAND (d)	ENERGY (e)	TOTAL	NO.
	301123022	(A)	(B)	(C)	(D)	(E)	(F)	(G)	
1	RS	23.059%	21.684%	12,796.9	7,086,165	\$0.00	\$0.00	\$0.00	1
2	GP & MP	13.162%	11.576%	7,304.2	3,783,135	\$0.00	\$0.00	\$0.00	2
3	PP	63.753%	66.127%	35,379.6	21,610,197	\$0.00	\$0.00	\$0.00	3
4		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	4
5	OL	0.000%	0.273%	0.0	89,283	\$0.00	\$0.00	\$0.00	5
6	SL	0.000%	0.307%	0.0	100,174	\$0.00	\$0.00	\$0.00	6
7		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	7
8		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	8
9	TS	0.026%	0.034%	14.3	10,981	\$0.00	\$0.00	\$0.00	9
10		0.000%	0.000%	0.0	0	\$0.00	\$0.00	\$0.00	10
11									11
12	TOTAL	100.000%	100.000%	55,495.0	32,679,935	\$0.00	\$0.00	\$0.00	12

⁽a) Adjusted allocators from Exhibit VI Rows (14) and (19) for the year o 202

⁽b) Exhibit IV, Page 6 of 7, Column E, Line 1 times Exhibit IV, Page 2 of 7, Column A

⁽c) Exhibit IV, Page 6 of 7, Column E, Line 2 times Exhibit IV, Page 2 of 7, Column B

⁽d) Exhibit IV, Page 1 of 7, Column A, Line 7 times Exhibit IV, Page 2 of 7, Column A

⁽e) Exhibit IV, Page 1 of 7, Column B, Line 7 times Exhibit IV, Page 2 of 7, Column B

Attachment LAT-3 to Direct Testimony of L. Tomczyk New ECA Model for CEL&P - Page 18 of 28

Exhibit IV Page 3 of 7

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

RECONCILIATION OF VARIANCES FOR THE THREE MONTHS OF:

				Jan-21	Feb-21	Mar-21				
LINE	RATE	ACTUAL AVERAGE KWH	ACTUAL AVERAGE KW/KVA	DEMAND ADJUSTMENT FACTOR PER	ENERGY ADJUSTMENT FACTOR PER	INCREMENTAL KW DEMAND COST BILLED	INCREMENTAL KWH ENERGY COST BILLED		US VARIANCE LISTED ABOVE	LINE
NO.	SCHEDULE	SALES (a)	SALES (a)	KWH (b)	KWH (c)	BY MEMBER (d)	BY MEMBER (e)	DEMAND (f)	ENERGY (q)	NO.
		(A)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	
1	RS	7,391,231	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	1
2	GP & MP	3,662,161	14,509.23	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	2
3	PP	20,387,011	39,050.99	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	3
4		0	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	4
5	OL	94,279	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	5
6	SL	104,844	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	6
7		0	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	7
8		0	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	8
9	TS	10,942	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	9
10		0	-	0.000000	0.000000	\$0.00	\$0.00	\$0.00	\$0.00	10
11										11
12	TOTAL	31,650,468	53,560			\$0.00	\$0.00	\$0.00	\$0.00	12

⁽a) Exhibit IV, Page 7 of 7, Column E (b) Page 3 of 3, Column F of Tracker Filing for the three months of: Jan-21 Feb-21 Mar-21 (c) Page 3 of 3, Column G of Tracker Filing for the three months of: Jan-21 Feb-21 Mar-21 (d) Column A times Column B times the Gross Income Tax Factor of: 0.986 (e) Column A times Column C times the Gross Income Tax Factor of: 0.986 (f) Exhibit IV, Page 4 of 7, Column D of Tracker Filing for the months of: Jan-21 Feb-21 Mar-21 (g) Exhibit IV, Page 4 of 7, Column E of Tracker Filing for the months of : Mar-21 Jan-21 Feb-21

Attachment LAT-3 to Direct Testimony of L. Tomczyk

New ECA Model for CEL&P - Page 19 of 28

Exhibit IV

Page 4 of 7

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

RECONCILIATION OF VARIANCES FOR THE THREE MONTHS OF:

Jan-21

Feb-21

Mar-21

LINE	RATE	NET INCREM	ENTAL COST BILLED B	Y MEMBER		VARIANCE		LINE
NO.	SCHEDULE	DEMAND (a)	ENERGY (b)	TOTAL	DEMAND (c)	ENERGY (c)	TOTAL (c)	NO.
		(A)	(B)	(C)	(D)	(E)	(F)	
1	RS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	1
2	GP & MP	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	2
3	PP	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	3
4		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	4
5	OL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	5
6	SL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	6
7		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	7
8		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	8
9	TS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	9
10		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	10
11								11
12	TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	12

⁽a) Column D minus Column F from Exhibit IV, page 3 of 7

⁽b) Column E minus Column G from Exhibit IV, Page 3 of 7

⁽c) Columns E, F, and G from Exhibit IV, Page 2 of 7 minus Columns A, B, and C

Attachment LAT-3 to Direct Testimony of L. Tomczyk
New ECA Model for CEL&P - Page 20 of 28

Exhibit IV

Page 5 of 7

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF ACTUAL DEDICATED CAPACITY PAYMENTS FOR THE THREE MONTHS OF

Jan-21 Feb-21 Mar-21 LINE LINE March TOTAL **AVERAGE** NO. NO. **DESCRIPTION** February January (C) (D) (A) (B) (E) \$0.00 1 **ACTUAL MEMBER GENERATING COSTS** \$0.00 \$0.00 \$0.00 \$0.00 2 LESS: GENERATING COSTS IN BASE RATES \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 2 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 3 3 DIFFERENCE IN ACTUAL TO BASE RATE COSTS (a) 4 ACTUAL MONTHLY PAYMENT FROM IMPA \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 4 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 5 LESS: ESTIMATED PAYMENT IN BASE RATES (f) 5 6 DIFFERENCE IN ACTUAL TO BASE RATE PAYMENT (b) \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 6 ACTUAL CAPACITY PAYMENT SAVINGS TO BE COLLECTED \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 7 7 THROUGH THE TRACKER (c) 8 ACTUAL MONTHLY KW BILLED (d) 52,951 56,942 56,591 166,484 55,495 8 \$0.000 \$0.000 \$0.000 9 9 ACTUAL CAPACITY PAYMENT SAVINGS PER KW (e) \$0.000

NOTE: This exhibit is only applicable to a municipal utility with generation.

⁽a) Line 1 minus Line 2

⁽b) Line 4 minus Line 5

⁽c) Line 3 minus Line 6

d) Exhibit IV, Page 6 of 7, Line 1

⁽e) Line 7 divided by Line 8

⁽f) Exhibit II, Line 5

Attachment LAT-3 to Direct Testimony of L. Tomczyk New ECA Model for CEL&P - Page 21 of 28

Exhibit IV Page 6 of 7

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF ACTUAL ENERGY COST ADJUSTMENT FROM HISTORICAL DATA

LINE NO.	DESCRIPTION		Jan-21	Feb-21	Mar-21	TOTAL	ACTUAL 3 MONTH AVERAGE	LINE NO.
	PURCHASED POWER FROM IMPA		(A)	(B)	(C)	(D)	(E)	
1	KW DEMAND (a)		52,951	56,942	56,591	166,484	55,495	1
2	KWH ENERGY (a)		33,149,838	31,186,070	33,703,898	98,039,806	32,679,935	2
	INCREMENTAL PURCHASED POWER	COSTS						
	DEMAND RELATED							
3	ECA FACTOR PER KW (a)		(3.260)	(3.260)	(3.260)		(3.260)	3
4	CHARGE (b)		(\$172,620.26)	(\$185,630.92)	(\$184,486.66)	(\$542,737.84)	(\$180,912.61)	4
	ENERGY RELATED							
5	ECA FACTOR PER KWH (a)		(0.002485)	(0.002485)	(0.002485)		(0.002485)	5
6	CHARGE (c)		(\$82,377.35)	(\$77,497.38)	(\$83,754.19)	(\$243,628.92)	(\$81,209.64)	6
`	a) From IMPA bills for the months of: b) Line 1 times Line 3	Jan-21	Feb-21	Mar-21				

⁽b) Line 1 times Line 3

⁽c) Line 2 times Line 5

Attachment LAT-3 to Direct Testimony of L. Tomczyk

New ECA Model for CEL&P - Page 22 of 28

Exhibit IV

Page 7 of 7

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

DETERMINATION OF ACTUAL AVERAGE KWH SALES HISTORICAL DATA

LINE NO.	RATE SCHEDULE		Jan-21 (A)	Feb-21(B)	<u>Mar-21</u> (C)	TOTAL (D)	AVERAGE (E)	LINE NO.
1	RS		7,668,254	7,560,899	6,944,541	22,173,693	7,391,231	1
2	GP & MP		3,692,322	3,726,251	3,567,911	10,986,484	3,662,161	2
3	PP		19,941,742	20,532,915	20,686,376	61,161,033	20,387,011	3
4			0	0	0	0	0	4
5	OL		102,209	93,353	87,274	282,836	94,279	5
6	SL		113,798	104,201	96,533	314,531	104,844	6
7			0	0	0	0	0	7
8			0	0	0	0	0	8
9	TS		10,855	10,942	11,029	32,826	10,942	9
10 11			0	0	0	0	0	10 11
12	TOTAL		31,529,178	32,028,560	31,393,664	94,951,402	31,650,468	12
			DETERMINAT	ION OF ACTUAL AVEF	RAGE KW/KVA SALES			
		_	Jan-21	Feb-21	Mar-21	TOTAL	AVERAGE	
13			0	0	0	0	0	13
14	GP & MP	NCP	14,197	15,133	14,197	43,528	14,509	14
15	PP	NCP	38,896	38,760	39,497	117,153	39,051	15
16			0	0	0	0	0	16
17			0	0	0	0	0	17
18			0	0	0	0	0	18
19			0	0	0	0	0	19
20			0	0	0	0	0	20
21			0	0	0	0	0	21
22		_	x	<u></u>				22
23			53,093	53,893	53,695	160,681	53,560	23

Exhibit V

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

Crawfordsville, Indiana

CALCULATION OF LINE LOSS FACTOR

FOR YEAR 2020

Month	Metered kWh Sold	IMPA Metered kWh Purchased
January	31,529,178	32,548,586
February	32,028,560	33,059,558
March	31,393,664	32,394,951
April	30,164,659	31,109,007
May	30,730,011	31,683,379
June	33,108,948	34,151,934
July	36,244,385	37,412,522
August	37,943,318	39,166,259
September	35,057,150	36,172,559
October	31,012,400	31,990,525
November	30,171,855	31,130,179
December	30,868,358	31,864,892
Subtotal	390,252,486	402,684,350
Other Adjustments (ie Unmetered sales)	0	0
Total	390,252,486	402,684,350
Estimated Losses kWh		12,431,864
Line Loss as percent of total purchases		3.09%

Exhibit VI

CRAWFORDSVILLE ELECTRIC LIGHT & POWER

Crawfordsville, Indiana

VERIFICATION FOR FUTURE USE OF KW DEMAND ALLOCATION AND KWH ENERGY ALLOCATION FACTORS IN COMPLIANCE WITH ORDERING PARAGRAPH 7 OF IURC CAUSE NO. 36835-S2, DATED MAY 2, 1984

Line <u>No.</u>	<u>Month</u>		Residential Service RS (A)	Municipal Power <u>GP & MP</u> (B)	Primary Power Service <u>PP</u> (C)	(D)	Outdoor Lighting <u>OL</u> (E)	Street Lighting SL (F)	Traffic Lighting TS (G)	<u>Total</u> (H)
1	January		7,668,254	3,692,322	19,941,742		102,209	113,798	10,855	31,529,178
2	February		7,560,899	3,726,251	20,532,915		93, 3 53	104,201	10,942	32,028,560
3	March		6,944,541	3,567,911	20,686,376		87,274	96,533	11,029	31,393,664
4	April		5,749,083	3,298,796	20,948,710		74,086	82,956	11,029	30,164,659
5	May		5,378,033	3,337,576	21,865,921		64,751	72,702	11,029	30,730,011
6	June		6,625,670	3,734,936	22,602,930		63,017	71,367	11,029	33,108,948
7	July		8,620,469	4,310,750	23,149,108		71,692	81,425	10,942	36,244,385
8	August		8,946,398	4,580,387	24,231,279		81,747	92,653	10,855	37,943,318
9	September		7,427,579	4,153,421	23,264,932		93,936	106,429	10,855	35,057,150
10	October		6,072,795	3,605,219	21,100,072		104,724	118,736	10,855	31,012,400
11	November		6,271,392	3,526,467	20,122,673		113,235	127,234	10,855	30,171,855
12	December		7,355,422	3,642,857	19,614,847		<u>116,170</u>	<u>128,208</u>	<u> 10,855</u>	<u>30,868,358</u>
13	Total		84,620,532	45,176,890	258,061,5 05	0	1,066,191	1,196,238	131,130	390,252,486
14	Percent of Total	(b)	<u>21.684%</u>	<u>11.576%</u>	<u>66.127%</u>	0.000%	0.273%	0.307%	0.034%	<u>100.000%</u>
15	kWh Energy									
	Factors	(a)	21.634%	11.550%	66.204%	0.000%	0.273%	0.306%	0.034%	<u>100.0000%</u>
16	Percent Variance	{c}	0.228%	0.228%	-0.116%	0.000%	0.228%	0.228%	0.228%	
17	kW Demand									
	Factors	(a)	23.009%	13.133%	63.8 3 2%	0.000%	0.000%	0.000%	0.026%	100.0000%
18	Adjusted Factors	(d)	23.061%	13.163%	63.758%	0.000%	0.000%	0.000%	0.026%	100.008%
19	Percent of Total	(e)	<u>23.059%</u>	<u>13.162%</u>	<u>63.753%</u>	0.000%	0.000%	0.000%	0.026%	<u>100.000%</u>

⁽a) Taken from Cost of Service Study based on Twelve Month Period ending February 28,2020.

⁽b) kWh sales by rate classification expressed as a percent of total kWH sales for the year 2018. Proposed kWh Energy allocator for year 2019.

[{]c} (Line 14/ Line 15)-1.

⁽d) (1+ Line 16) * Line 17.

⁽e) (Line 18) / (Line 18, column H). Proposed kW Demand allocator for year 2021.

General Inputs

Trackers for CRAWFORDSVILLE ELECTRIC LIGHT & POWER

Name of Utility: Crawfordsville Electric Light & Power Location: Crawfordsville, Indiana 3rd Quarter 2021 Enter data only in cells with yellow shading. Please date entries where requested.

Initial month for the projected period	Jul-21	Aug-21	Sep-21
Historical period for this analysis	Jan-21	Feb-21	Mar-21

IMPA rate for the period covered by this analysis:						Entered:	8/10/2020
Demand				Energy \$/kWh			
Base Production	\$	26.217			\$	0.028875	
Delivery Voltage Total	\$	26.217			\$	0.028875	
Capacity Payment (Annual)			\$	_	\$		Average

Rate effective f	or the BASE	Entered:	8/10/2020			
effective for			Demand		Energy	
			<u>\$/kW</u>		<u>\$/kWh</u>	
Base Production		\$	26.217	\$	0.028875	
Delivery Voltag	e					
ECA		\$ (3.260)			-0.002485	
			22.957		0.026390	
			3.260		0.002485	

	Generation Costs & Capacity Payments From most recent Electric Rate Study			
	Generation		Capacity	
	Costs in		Payments in	
	Base Rates		Base Rates	
Inc Change Base Rate	\$ -		\$ -	

Data from IMF	PA					Entered:	4/13/2021
Estimated Pu	rchased Power f	rom IMPA					
kW						kWh	
	<u>Jul-21</u>	Aug-21	Seg-21		<u>Jul-21</u>	Aug-21	Sep-21
	72,847	66,600	70,367		40,201,261	37,570,660	34,754,299
Total Billing Determinants		209,814	kW		112,526,220		kWh
	De	mand ECA - \$/	kW	Energy ECA - \$			Wh
IMPA ECA	(\$3.260)	(\$3.260)	(\$3.260)		(\$0.002485)	(\$0.002485)	(\$0.002485)

Data from IMPA's Bills		Entered:	4/15/2021		
-				То	tal
				Billing Det	<u>erminants</u>
Month of Service	<u>Jan-21</u>	Feb-21	<u>Mar-21</u>	<u>Sum</u>	<u>Average</u>
Demand (kW)	52,951	56,942	56,591	166,484	55,495
Energy (kWh)	33,149,838	31,186,070	33,703,898	98,039,806	32,679,935
Energy Cost Adjustment (EC	CA)				
Demand, \$/kW	(\$3.260)	(\$3.260)	(\$3.260)		
Energy, \$/kWh	(\$0.002485)	(\$0.002485)	(\$0.002485)		
Capacity Payments Less Fu	el\$ -	\$ -	\$ -	\$ -	\$ -

Incremental Change in Ba	se Rate	Entered:	4/15/2021
from Attachment "B", page			
for the months of:	Jan-21	Feb-21	Mar-21
	Demand		Energy
	Related		Related
Incremental Change	\$/kVA		\$/kWh
in Base Rates	3.260		0.002485

Rate Tariffs		Demand billed	Is Demand	Is delivery at	Is this a	Does a
Note: Once all rate cod	des are entered, put N/A in remaining blanks (Col A)	on basis of	billed on	transmission v	flat rate?	Tracker apply
Code	Name/Description	Coincident Pk	NCP Peak?	1		to this rate?
		("1" = yes	, "0" = no)			
RS	Residential Service	1 1		1		1
GP & MP	Gen. Power & Municipal Power		1			1
PP	Primary Power Service		1			1
OL	Outdoor Lighting				1	1
SL	Street Lighting				1	1
TS	Traffic Lighting				1	1
						1

Adjustmen	nt Factors (per k\	Wh)		Entered:	4/15/2021	
Copy from	Attachment B, F	Page 3 of 3, of Tracker calculation for the billing periods of:				
	Jan-2	21 Feb-21 Mar-21	Factor per kW/kV/	Factor p	er kWh	
			Demand	Demand	Energy	
1			(Att. A	(copy from	(copy from	Total
ı	<u>Code</u>	Name/Description	Column G)	Column F)	Column G)	(to verify)
1	RS	Residential Service	0.000000	0.000000	0.000000	0.000000
2	GP & MP	Gen. Power & Municipal Power	0.000000	0.000000	0.000000	0.000000
3	PP	Primary Power Service	0.000000	0.000000	0.000000	0.000000
4			0.000000	0.000000	0.000000	0.000000
5	OL	Outdoor Lighting	0.000000	0.000000	0.000000	0.000000
6	SL	Street Lighting	0.000000	0.000000	0.000000	0.000000
7	0	0	0.000000	0.000000	0.000000	0.000000
8	0	0	0.000000	0.000000	0.000000	0.000000
9	TS	Traffic Lighting	0.000000	0.000000	0.000000	0.000000
10	0	0	0.000000	0.000000	0.000000	0.000000
11						
12	Total			0.000000	0.000000	0.000000

Allocation F			Entered:			
11011120201	tato otacy	Fact	Factors for New Rates			
)		kW Demand	kWh Energy	Power		
Code	Name/Description	<u>Factors</u>	<u>Factors</u>	<u>Factors</u>		
RS	Residential Service	23.009%	21.634%			
GP & MP	Gen. Power & Municipal Power	13.133%	11.550%	48.102%		
PP	Primary Power Service	63.832%	66.204%	85.601%		
0	0	0.000%	0.000%			
OL	Outdoor Lighting	0.000%	0.273%			
SL	Street Lighting	0.000%	0.306%			
0	0	0.000%	0.000%			
0	0	0.000%	0.000%			
TS	Traffic Lighting	0.026%	0.034%			
0	0	0.000%	0.000%			
		100.000%	100.000%			

Indiana Utility Receipts Tax	
Tax Rate	1.40%
Tax Factor	0.9860

<u> </u>		3/1/2021
Distribution Loss Factor:	3.09%	0/1/2021
(From Exhibit V)		

Residential Rat	e [Data			8	/10/20
			Usa	ge (kWh):		860
	<u>C</u>	urrent Rate	Las	t Quarter	This	Quarter
Customer Cha	\$	15.00	\$	15.00	\$	15.00
Energy, All kW	\$	0.097405	\$	83.77	\$	83.77
Last Quarter	\$		\$	-		
This Quarter	\$	~			\$	-
			\$	98.77	\$	98.77

A 01	0/ 01
\$ Change	<u>% Change</u>
(0.00)	0.09

Data for Loss Calculation		Entered:	1/25/2021
Calendar Yr		Purchased	Line
<u>2020</u>	Retail Sales	<u>Power</u>	Loss
January	31,529,178	32,548,586	3.13%
February	32,028,560	33,059,558	3.12%
March	31,393,664	32,394,951	3.09%
April*	30,164,659	31,109,007	3.04%
May	30,730,011	31,683,379	3.01%
June	33,108,948	34,151,934	3.05%
July	36,244,385	37,412,522	3.12%
August	37,943,318	39,166,259	3.12%
September	35,057,150	36,172,559	3.08%
October	31,012,400	31,990,525	3.06%
November	30,171,855	31,130,179	3.08%
December	30,868,358	31,864,892	3.13%
SubTotal	390,252,486	402,684,350	3.09%
Unmetered Sales			
Total	390,252,486	402,684,350	3.09%
* Billing period realignment,	meter read dates	s shifted.	

Previous Va	<u>riance</u>			Entered:	4/15/2021
Copy from E	xhibit IV, Page 4 of 7 of	of Tracker calcu	lations for	the billing perio	ds of
	Jan-21	Feb-21	Mar-21		
				Demand	Energy
				(copy from	(copy from
Code	Name/Descrip		Column D)	Column E)	
RS	Residential Service			_	-
GP & MP	Gen. Power & Muni	cipal Power		-	-
PP	Primary Power Sen	vice		-	-
0	0			-	-
OL	Outdoor Lighting			-	-
SL	Street Lighting			-	-
0	0			-	-
0	0			-	-
TS	Traffic Lighting			-	-
0	0			-	-
				-	_

Attachment LAT-3 to Direct Testimony of L. Tomczyk New ECA Model for CEL&P - Page 27 of 28

nergy Sales	(kWh) by Rate T	ariff			4/15/2021							
or latest com	plete calendar ye	ear (from utility	documents)		Update Quarterly	y to accumulate	data for Ex VI					
										Total	Purchased	Distribution
	<u>RS</u>	GP & MP	<u>PP</u>	<u>0</u>	<u>OL</u>	<u>SL</u>	<u>0</u>	<u>0</u>	<u>TS</u>	Sales (kWh)	Power (kWh)	Losses (%)
Jan-20	7,668,254	3,692,322	19,941,742		102,209	113,798			10,855	31,529,178	32,548,586	3.1%
Feb-20	7,560,899	3,726,251	20,532,915		93,353	104,201			10,942	32,028,560	33,059,558	3.1%
Mar-20	6,944,541	3,567,911	20,686,376		87,274	96,533			11,029	31,393,664	32,394,951	3.1%
Apr-19	5,749,083	3,298,796	20,948,710		74,086	82,956			11,029	30,164,659	31,109,007	3.0%
May-19	5,378,033	3,337,576	21,865,921		64,751	72,702			11,029	30,730,011	31,683,379	3.0%
Jun-19	6,625,670	3,734,936	22,602,930		63,017	71,367			11,029	33,108,948	34,151,934	3.1%
Jul-19	8,620,469	4,310,750	23,149,108		71,692	81,425			10,942	36,244,385	37,412,522	3.1%
Aug-19	8,946,398	4,580,387	24,231,279		81,747	92,653			10,855	37,943,318	39,166,259	3.1%
Sep-19	7,427,579	4,153,421	23,264,932		93,936	106,429			10,855	35,057,150	36,172,559	3.1%
Oct-19	6,072,795	3,605,219	21,100,072		104,724	118,736			10,855	31,012,400	31,990,525	3.1%
Nov-19	6,271,392	3,526,467	20,122,673		113,235	127,234			10,855	30,171,855	31,130,179	3.1%
Dec-19	7,355,422	3,642,857	19,614,847		116,170	128,208			10,855	30,868,358	31,864,892	3.1%
Total	84,620,532	45,176,890	258,061,505	-	1,066,191	1,196,238	-	-	131,130	390,252,486	402,684,350	3.09%

Tracker of:	Previous Quarter	(Diff fro	m Black A60 Above)	4/15/2021	Current	
	For Comparison		F		<u>Tracker</u>	Difference
RS		-	per KWH	0.000000	-	-
GP & MP		-	per KW	0.000000	-	-
		-	per KWH	0.000000	-	-
PP		-	per KVA	-	-	-
		-	per KWH	-	-	-
0		-	per KVA		-	-
		-	per KWH		-	-
OL		-	per KWH	0.000000	-	-
SL		-	per KWH	0.000000	-	-
0		-	per KWH		-	-
0		-	per KWH		-	-
TS		-	per KWH	0.000000	-	-
0		-	per KWH			
0		-	per KWH			
Page 3 of 3	Column H Total:	_				

Energy Cost Adjustment (Revenue	Report) KWH		odel for CEL&F	
Usage Billed by Rate Class	<u>Jan-21</u>	<u>Feb-21</u>	<u>Mar-21</u>	<u>Average</u>
RS GP & MP	7,668,254 3,692,322	7,560,899 3,726,251	6,944,541 3,567,911	7,391,231 3,662,161
OL SL	19,941,742 102,209 113,798	20,532,915 93,353 104,201	20,686,376 87,274 96,533	20,387,011 94,279 104,844
тѕ	10,855	10,942	11,029	10,942
Grand Total	31,529,178	32,028,560	31,393,664	31,650,467
Demand Class Data (kW or kVA)				4/25/2021
GP & MP PP	14,197 38,896 -	15,133 38,760 -	14,197 39,497 -	14,509 39,051 -
	53,092.98	53,893.17	53,694.51	53,560.22



Attachment LAT-4 - Non-Recurring Charge Calcs - Summary of Charges

									Benchmarking		
Type of Charge	Units		CEL&P Current		CEL&P Proposed		CELP Cost		Ave	Range	
Service Deposit			****								
Rate Sched RS	Minimum \$/Deposit1	\$	50.00	\$	60.00	\$	60.00	\$	163.33	\$140.00-\$200.00	
Rate Sched GP, PP, and IP	Minimum \$/Deposit ²	\$	100.00	\$	120.00	\$	120.00	\$	175.00	\$150.00-\$200.00	
Return Check Charge	\$/Retumed Check3	\$	25.00	\$	25.00	\$	23.77	\$	24.00	\$15.00-\$40.00	
Reconnect/Disconnect Charge											
During normal Utilty hours	\$/Reconnect or Disconnect	\$	40.00	\$	45.00	\$	98.17	\$	58.33	\$20.00-\$75.00	
Outside normal Utility hours	\$/Reconnect or Disconnect	\$	100.00	\$	120.00	\$	127.26	\$	91.89	\$20.00-\$250.00	
Temporary Charge	\$/Temporary Service4	\$	100.00	\$	150.00	\$	247.06	Ε	st. Cost	\$200.00 - Est. Cost	
Meter Test Charge	\$/Meter Test ⁵	\$	40.00	\$	50.00	\$	214.51	\$	35.00	\$15.00-\$75.00	
Service Call Charge											
Outside normal Utility hours	\$/Service Call	\$	200.00	\$	250.00	\$	534.56	\$	57.50	\$40.00-\$75.00	
Late Payment Charge	% of Unpaid Balance		4.0%		5.0%		4.5%		3.3%	3%-5%	
Meter Base Charge											
Residential Customers	\$/Meter Base		NA	\$	50.00	\$	50.00		NA	NA	
Commercial Customers	\$/Meter Base		NA	\$	100.00	O۱	ver \$100.00		NA	NA	
Electric Permit Fee	\$/Permit		NA	\$	50.00	\$	908.32		NA	NA	
Lot Fee	\$/Lot ⁶		NA	\$	1,000.00	\$	1,000.00		NA	NA	

¹ Minimum for Residential Service to a maximum of 2 months anticipated usage. The actual amount shall be based on the results of a credit check.

Minimum for General Power, Primary Power, and Industrial Power Service. The actual amount shall be based on the results of a credit check.

For the current charge, the greater of \$25.00 or 5% (but not more than \$250) of the amount of the check. For the proposed charge, the greater of \$25.00 or 6% (but not more than \$250) of the amount of the check.

⁴ When no more than a single span service drop and meter are required.

⁵ If customer requests a meter test less frequently than in a 36-month period and upon test, the meter accuracy is less than 3% error.

⁶ Based on 8 years to recover investment.



Attachment LAT-4 - Non-Recurring Charge Calculations - Inputs

Line	Description	Unit		Amount	Source
No.	(1)	(2)		(4)	
1	Hourly Wages				
2	Office Staff	\$/hr	\$	19.68	CELP
3	Inspector	\$/hr	\$	36.92	CELP
4	Lineman	\$/hr	\$	39.14	CELP
5	Meter Tech	\$/hr	\$	21.55	CELP
6	Overhead Rate	\$/hr	\$	36.62	CELP
7	Fullen Burdened Hourly Costs				
8	Office Staff	\$/hr	\$	56.30	
9	Inspector	\$/hr	\$	73.54	
10	Lineman	\$/hr	\$	75 .76	
11	Meter Tech	\$/hr	\$	58.17	
12	Truck Charge	\$/hr	\$	40.00	CELP



Attachment LAT-4 - Non-Recurring Charge Calcs - Service Deposit

. =		Avera	ge M	onthly Bill		Number of	
Line	Class	Current		Step 1	Step 2	Customer-Months	Source
No.	(1)	(2)		(3)	(4)	(5)	(6)
1	Residential	\$ 88.74	\$	94.92	\$ 101.53	81,571	Att JAM-4
2	Residential Electric	\$ 100.60	\$	107.79	\$ 115.47	18,576	Att JAM-4
3	1 Phase General Power	\$ 137.66	\$	141.04	\$ 144.58	13,502	Att JAM-4
4	3 Phase General Power	\$ 661,79	\$	703.82	\$ 748.05	4,156	Att JAM-4
5	Primary Power	\$ 21,869.11	\$	24,125.33	\$ 26,599.58	918	Att JAM-4
6	Res/Res Elec Combined	\$ 90.94	\$	97 .31	\$ 104.12	100,147	
7	% Change			7.0%	7.0%		
8	Gen Power/Prim Power Combined	\$ 1,328.92	\$	1,452.29	\$ 1,587.04	18,576	
9	% Change			9.3%	9.3%		
		Ser	vice	Deposit			
Line	Class	Current		Step 2	Source		
No.	(1)	 (2)		(4)	(5)		
10	Res/Res Elec Combined	\$ 50.00	\$	60.00	CELP		
11	Gen Power/Prim Power Combined	\$ 100. 0 0	\$	120.00	CELP		



Attachment LAT-4 - Non-Recurring Charge Calcs - Return Check Charge

Line No.	Description (1)	Unit (2)			Source (4)	Current Charge (5)
1	Bank Charge	\$/check	\$	5.00	CELP	
2	Office Staff Hours	hrs		0.33	CELP	
3	Burdened Labor Cost	\$/check	\$	18.77		
4	Total Cost Incl Bank Charge	\$/check	\$	23.77		
5	Recommended	\$/check	\$	25.00	CELP	\$ 25.00



Attachment LAT-4 - Non-Recurring Charge Calcs - Reconnect/Disconnect Charge

Line	Description	Unit	Amount	Source	Curr	ent Charge
No.	(1)	(2)	 (3)	(4)		(5)
1	Meter Tech Hours	hrs	 1.00	CELP		
2	Burdened Labor Cost	\$/reconnect_disconnect	\$ 58.17			
2	Truck Hours	hrs	1.00	CELP		
3	Truck Cost	\$/reconnect_disconnect	\$ 40.00			
4	Total Cost	\$/reconnect_disconnect	\$ 98.17			
3	Recommended - Normal Busine:	\$/reconnect_disconnect	\$ 45 .00	CELP	\$	40.00
4	After Hours Penalty	% of labor costs	50%	CELP		
5	Total Cost Incl After Hours Pena	\$/reconnect_disconnect	\$ 127.26			
6	Recommended - After Normal Bi	\$/reconnect_disconnect	\$ 120.00	CELP	\$	100.0 0



Attachment LAT-4 - Non-Recurring Charge Calcs - Temporary Service Charge

Line	Description	Unit	A	mount	Source	Current Charge
 No.	(1)	(2)		(3)	(4)	(5)
1	Office Staff Hours to Process	hrs		0.33	CELP	
2	Office Staff Burdened Labor Cost	\$/temporary service	\$	18.77		
3	Inspector Hours to Install Meter	hrs		0.50	CELP	
4	Inspector Burdened Labor Cost	\$/temporary service	\$	36.77		
5	Lineman Hours to Connect/Reconnect (2	hrs		2.00	CELP	
6	Lineman Burdened Labor Cost	\$/temporary service	\$	151.52		
7	Truck Hours	hrs		1.00	CELP	
8	Truck Cost	\$/temporary service	\$	40.00		
9	Total Cost	\$/temporary service	\$	247.06		
10	Recommended	\$/temporary service	\$	150.00	CELP	\$ 100.00



Attachment LAT-4 - Non-Recurring Charge Calcs - Meter Test Charge

Line	Description	Unit	Ame	ount	Source	Current Charge
No.	(1)	(2)	(;	3)	(4)	(5)
1	Meter Tech Hours	hrs		3.00	CELP	
2	Meter Tech Burdened Labor Cost	\$/meter test	\$ 1	74.51		
3	Truck Hours	hrs		1.00	CELP	
4	Truck Cost	\$/meter test	\$	40.00		
5	Total Cost	\$/meter test	\$ 2	214.51		
6	Recommended	\$/meter test	\$	50.0 0	CELP	\$ 40.00



Attachment LAT-4 - Non-Recurring Charge Calcs - Service Call Charge

Line No.	Description (1)	Unit (2)	,	Amount (3)	Source (4)	Current Charge (5)
1	Lineman Hours (2 linemen)	hrs		4.00	CELP	(-/
2	Meter Tech Burdened Labor Cost	\$/service call	\$	303.04		
3	After Hours Penalty	% of labor costs		50%	CELP	
4	Truck Hours	hrs		2.00	CELP	
5	Truck Cost	\$/service call	\$	80.00		
6	Total Cost	\$/service call	\$	534.56		
7	Recommended - After Normal Business Hrs	\$/service call	\$	250.00	CELP	\$ 200.00



Attachment LAT-4 - Non-Recurring Charge Calcs - Late Payment Charge

Line	Description	Unit	Amount	Source	Current Charge
No.	(1)	(2)	(3)	(4)	(5)
1	Office Staff Hours (6 office stafff)	hrs per month	 20.00	CELP	
2	Office Staff Burdened Labor Cost	\$/month	\$ 1,126.00		
3	No. of Late Notices & Non-Payments	per month	230	CELP	
4	Breakdown of Late Notices and Non-Pa	ayments			
5	Residential	%	90%	Att JAM-2	
6	General Power	%	10%	Att JAM-2	
7	Average Monthly Bills (Step 2)				
8	Residential	\$/month	\$ 104.12	Att JAM-4	
9	General Power (1-Phase)	\$/month	\$ 144.58	Att JAM-4	
10	Weighted Avarge	\$/month	\$ 108.16		
11	Average Monthly Unpaid Balance	\$/month	\$ 24,877.63		
12	Labor Cost as % of unpaid balance	% of unpaid balance	5%		
13	Recommended	% of unpaid balance	5%	CELP	4%



Attachment LAT-4 - Non-Recurring Charge Calcs - Meter Base Charge

Line	Description	Unit	A	mount	Source	Current Charge
No.	(1)	(2)		(3)	(4)	(5)
1	Average Meter Base Costs					
2	Residential	\$/meter base	\$	50.00	CELP	
3	Commercial & Industrial	\$/meter base	O	er \$100.00	CELP	
4	Recommended					
5	Residential	\$/meter base	\$	5 0.00		NA
6	Commercial & Industrial	\$/meter base	\$	100.00		NA



Attachment LAT-4 - Non-Recurring Charge Calcs - Electric Permit Fee

Line Description No. (1)		Unit (2)	•	Amount (3)	Source (4)	Current Charge (5)
 1	Inspector Hours (4 inspections)	hrs		8.00	CELP	
2	Inspector Burdened Labor Cost	\$/permit fee	\$	588.32		
3	Truck Hours	hrs		8.00	CELP	
4	Truck Cost	\$/permit fee	\$	320.00		
5	Total Cost	\$/permit fee	\$	908.32		
6	Recommended	\$/permit fee	\$	50.00	CELP	NA



Attachment LAT-4 - Non-Recurring Charge Calcs - Lot Fee

Line	Description	Unit	Amount	Source	Current Charge
No.	(1)	(2)	(3)	(4)	(5)
1	Diamond Ridge Subdivision Costs (201	18-2019)			
2	Total Labor & Materials Costs	\$	\$ 120,737.74	CELP	
3	Number of Home Lots	# of home lots	73.00	CELP	
4	Cost Per Home Lot	\$/home lot	\$ 1,653.94		
5	Average Residential Mo. Bill (Step 2)	\$/customer/month	\$ 101.53	Att JAM-4	
6	Average Monthly Expenses	\$/customer/month	\$ 94.36	Att JAM-2	
7	Return on Investment	\$/customer/month	\$ 7.17		
8	Recommended Lot Fee	\$/Lot	\$ 1,000.00	CELP	NA
9	Years to Recover Investment				
10	Without Lot Fee	years	19		
11	With Lot Fee	years	8		
12	APPA Recommendation-Residential	years	5- 9		

Attachment LAT-4 to the Direct Testimony of L. Tomczyk Page 13 of 13

Attachment LAT-4 - Non-Recurring Charges - Benchmarking

	CEL	&P Proposed	Ric	hmond	Tir	omont	Duke	Par	ke County		Tipton	Frankfort	Anderson	Lebanon		Peru	IPL		Ave	Range
Service Deposit					• • • •			-				,								· g -
Rate Sched RS	\$	60.00		NA	\$	200.00	1/6 th of	\$	150.00		/4 th of	1/6 th of		1/6 th of		140.00	1/6 th of	\$	163.33	\$140.00-\$200.00
Rate Sched GP, PP, and IP	\$	120.00		NA	ς.	200.00	annual billing	¢	150,00		annual billing	annual billing	1/6 th of annual billing	annual billing		months st, bill	annual billing	ς.	175.00	\$150.00-\$200.00
Return Check Charge	\$	25.00	\$	20.00	\$	20.00	\$ 20.00	¢	30.00	Ś	25.00	\$ 25.00	\$ 40.00	\$ 15.00	\$	25.00	\$ 20.00		24.00	\$15.00-\$40.00
Reconnect/Disconnect Charge	Ψ	25.00	ب	20.00	ب	20.00	J 20.00	ب	30.00	Y	25.00	\$ 25.00	7 40.00	Ç 13.00	Ţ	25,00	\$ 20.00	Ţ	24.00	\$15.00-\$40.00
During normal Utilty hours	\$	45.00	ς.	30.00	Ś	75.00	\$ 37.00	Ś	75.00	Ś	20.00	\$ 33.00	\$ 30.00	\$ 20.00	Ś	25.00	\$ 44.00	Ś	58.33	\$20.00-\$75.00
Outside normal Utility hours	\$	120.00	Š	70.00	\$	75.00	\$ 250.00	•	130.00	Ś	20.00	\$ 93.00	\$ 75.00	NA	Ś	50.00	\$ 64.00	\$	91.89	\$20.00-\$250.00
Temporary Charge	\$	150.00	*	NA		200.00	Est.Cost	т.	NA	т	NA	Est.Cost	Est.Cost	Est.Cost	7	NA	NA		t. Cost	\$200.00 - Est. Cost
Meter Test Charge	\$	50.00	\$	35.00	•	NA	NA	\$	75.00	\$	40.00	NA	\$15.00-\$30.00	NA	\$	15.00	NA	\$		\$15.00-\$75.00
Service Call Charge																				
Outside normal Utility hours	\$	250.00	\$	40.00	\$	75.00	NA		NA		NA	NA	NA	NA		NA	NA	\$	57.50	\$40.00-\$75.00
								10	% of first				10% of first							
Late Payment Charge		5%		NA		5%	3%	\$3.0	0, then 3%		NA	3%	\$3.00, then 3%	NA		3%	NA		3.3%	3%-5%
Meter Base Charge																				
Residential Customers	\$	50.00		NA		NA	NA		NA		NA	NA	NA	NA		NA	NA		NA	NA
Commercial Customers	\$	100.00		NA		NA	NA		NA		NA	NA	NA	NA		NA	NA		NA	NA
Electric Permit Fee	\$	50.00		NA		NA	NA Cost less		NA		NA	NA	NA	NA		NA	NA		NA	NA
							2.5 yrs													
Lot Fee	\$	1,000.00		NA	_	NA	revenue		NA		NA	NA	NA	NA		NA	NA		NA	NA



Attachment LAT-5 - LED Lighting Design

Line No.	HPS Streetlights Equivalent LED Streetlights	100 W HPS 47 W LED		\$/Fixture 250 W HPS 81 W LED		400 W HPS 142 W LED
1	HPS COS SL Operating Costs	\$ 11.66	\$	13.09	\$	15.24
2	Equiv LED SL Operating Costs	\$	\$	9.85	\$	10.93
3	Difference (LED SL Costs Minus HPS SL Costs)	\$ (2.47)	\$	(3.24)		(4.31)
4	Proposed Phase 2 HPS SL Fixture Charges	\$ 6.80	\$	27.55	\$	45.03
5	Less Difference in LED SL vs HPS SL Operating Costs	\$ (2.47)	\$	(3.24)	\$	(4.31)
6	Proposed LED SL Fixture Charges	\$ 4.33	\$	24.31	\$	40.72
Line	HPS Outdoor Lighting	100 W HPS	250 W HPS			400 W HPS
No.	Equivalent LED Outdoor Lighting	47 W LED		81 W LED		142 W LED
7	HPS COS OL Operating Costs	\$ 4.29	\$	5.71	\$	7.84
8	Equiv LED OL Operating Costs	\$ 3.27	\$	3.93	\$	5.00
9	Difference (LED OL Costs Minus HPS OL Costs)	\$ (1.01)	\$	(1.78)	\$	(2.84)
10	Proposed Phase 2 HPS OL Fixture Charges	\$4.97		\$12.81		\$34.85
11	Less Difference in LED OL vs HPS OL Operating Costs	\$ (1.01)	\$	(1.78)	\$	(2.84)
12	Proposed LED OL Fixture Charges	\$ 3.96	\$	11.03	\$	32.01



Attachment LAT-5 - Lighting COS

					H	igh F	Pressure Sodi	ım	Equivalent LED							
	Watts				100		250		400	47			81		142	
Line	With Losses Watts	cos			121		303		485		57		101		176	
No.	kWh/Month	Un	Unit Charge		40		59		102	19		34			59	
	Streetlights COS						\$/Fixture					\$/Fixture				
1	Demand	\$	0.0049	\$	0.60	\$	1.50	\$	2.40	\$	0.28	\$	0.50	\$	0.87	
2	Energy	\$	0.0291	\$	1.17	\$	1,71	\$	2.96	\$	0.55	\$	0.98	\$	1.70	
3	Customer	\$	3.80	\$	3.80	\$	3.80	\$	3.80	\$	3.80	\$	3.80	\$	3.80	
4	Lighting O&M	\$	6.09	\$	6.09	\$	6.09	\$	6.09	\$	4.56	\$	4.56	\$	4.56	
5	COS - Operating Expenses			\$	11.66	\$	13.09	\$	15.24	\$	9.19	\$	9.85	\$	10.93	
	Outdoor Lights COS						\$/Fixture						\$/Fixture			
6	Demand	\$	0.0049	\$	0.59	\$	1.48	\$	2.37	\$	0.28	\$	0.49	\$	0.86	
7	Energy	\$	0.0290	\$	1.17	\$	1.70	\$	2.94	\$	0.55	\$	0.98	\$	1.69	
8	Customer	\$	2.23	\$	2.23	\$	2.23	\$	2.23	\$	2.23	\$	2.23	\$	2.23	
9	Lighting O&M	\$	0.29	\$	0.29	\$	0.29	\$	0.29	\$	0.22	\$	0.22	\$	0.22	
10	COS - Operating Expenses			\$	4.29	\$	5.71	\$	7.84	\$	3.27	\$	3.93	\$	5.00	