

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF SOUTHERN)
INDIANA GAS AND ELECTRIC COMPANY)
D/B/A VECTREN ENERGY DELIVERY OF)
INDIANA, INC. ("VECTREN SOUTH") FOR) CAUSE NO. 43406- RCRA-18
APPROVAL OF A RELIABILITY COST AND)
REVENUE ADJUSTMENT FOR ELECTRIC)
SERVICE IN ACCORDANCE WITH THE)
ORDERS OF THE COMMISSION ISSUED IN)
CAUSE NO. 43111 DATED AUGUST 15, 2007,)
CAUSE NO. 43839 DATED APRIL 27, 2011,)
AND CAUSE NO. 43406 RCRA-15 DATED)
MAY 16, 2018)

VERIFIED PETITION

Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc., a CenterPoint Energy Company ("Petitioner" or "Vectren South") respectfully shows to the Commission the following:

1. Petitioner is a public electric generating utility corporation organized and existing under the laws of the State of Indiana, and has its principal office at One Vectren Square, Evansville, Indiana 47708. It is engaged in rendering electric public utility service in the State of Indiana, and owns, operates, manages and controls, among other things, plant and equipment within the State of Indiana used for the production, transmission, delivery and furnishing of such service to the public. Petitioner is subject to the jurisdiction of this Commission in the manner and to the extent provided by the Public Service Commission Act and other laws of the State of Indiana.

2. The names and addresses of Petitioner's attorneys in this matter are

Heather A. Watts and Justin C. Hage, both of One Vectren Square, Evansville, Indiana 47708. The said attorneys and Katie J. Tieken, One Vectren Square, Evansville, Indiana 47708, are duly authorized to accept service of papers in this Cause on behalf of the Petitioner.

3. Petitioner considers Ind. Code 8-1-2-42(a) to be applicable to this petition. This petition is filed pursuant to provisions of the Orders issued by the Commission in Cause No. 43111 and Cause No. 43839 on August 15, 2007 and April 27, 2011, respectively, and Petitioner's Tariff Sheet No. 74, Appendix J. In addition, the Commission's Order in Cause No. 43406-RCRA-10 on October 17, 2012 approved annually, rather than semi-annually, RCRA filings.

4. This petition is also filed pursuant to the Commission's Order in Cause No. 43406-RCRA-15 on May 16, 2018 whereby the Commission approved the Stipulation and Settlement Agreement (entered into on November 28, 2017) in Cause No. 43354 MCRA 21, which modified Vectren South's 4CP allocation factors from those approved in Cause No. 43839, Vectren South's last rate case.

5. Furthermore, Petitioner, the Indiana Office of Utility Consumer Counselor ("OUCC"), the Vectren Industrial Group ("Industrial Group"), and SABIC Innovative Plastics Mt. Vernon, LLC ("SABIC") (collectively, the "Settling Parties") jointly filed a Stipulation and Settlement Agreement on June 12, 2020 under Cause No. 43354 MCRA 21 S1 ("the MCRA 21 S1 Settlement Agreement") to modify the allocation percentages for each of Vectren South's electric rider mechanisms, and to maintain these allocation percentages until the filing of Vectren South's next electric base rate case. This petition is also filed pursuant to the pending MCRA 21 S1 Settlement Agreement.

6. Pursuant to the August 15, 2007 and April 27, 2011 Orders and Appendix J, the RCRA allows Petitioner to track the differences between certain actual costs

and revenues and the amounts of those costs and revenues included in Petitioner's base rates. RCRA cost and revenue components include the non-fuel component of purchased power, cost of Environmental Emission Allowances ("EEAs"), Interruptible Sales billing credits, the retail sharing portion of Wholesale Power Marketing ("WPM") sales margins, the margins from Municipal Wholesale Sales, and the retail portion of the margin from EEA sales (net of cost). This RCRA petition reconciles actual RCRA costs and recoveries experienced during May 2019 through April 2020 (the "Reconciliation Period").

7. Petitioner is filing its case in chief, including direct testimony and exhibits, in support of this petition concurrently with this petition. Petitioner respectfully requests a procedural schedule that will allow for a Commission Order by November 1, 2020.

8. The books and records of Petitioner supporting such data and calculations are kept in accordance with the Uniform System of Accounts for Electric Utilities prescribed by this Commission and are available for inspection and review by the OUCC and this Commission.

9. Petitioner has consulted with the OUCC and agreed on the following procedural schedule:

July 20, 2020: Petitioner files Petition and testimony constituting its Case-in-Chief

September 18, 2020: OUCC files testimony

October 16, 2020: Evidentiary Hearing

WHEREFORE, Petitioner respectfully prays that the Indiana Utility Regulatory Commission enter an order in this Cause authorizing and approving the requested Reliability Cost and Revenue Adjustment, as set forth in the testimony and exhibits of Petitioner, to become effective November 1, 2020 and for all other appropriate relief.

DATED: this 20th day of July 2020.

Southern Indiana Gas and Electric Company
d/b/a Vectren Energy Delivery of Indiana, Inc.,
a CenterPoint Energy Company ("Vectren South")




Katie J. Tieken
Manager, Regulatory and Rates

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Attorneys for Petitioner

VERIFICATION

The undersigned, Katie J. Tieken affirms, under penalty of perjury, that she is Manager, Regulatory and Rates of Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc., a CenterPoint Energy Company, that in such capacity she has executed the foregoing Verified Petition and that the representations contained therein are true to the best of her respective knowledge, information and belief.


Katie J. Tieken

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the Verified Petition and pre-filed Testimony and Exhibits of Petitioner, Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc., a CenterPoint Energy Company ("Vectren South"), has been served on the Indiana Office of Utility Consumer Counselor, PNC Center, 115 W. Washington Street, Suite 1500 South, Indianapolis, Indiana, this 20th day of July 2020.



Justin C. Hage
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