

**DIRECT TESTIMONY OF KAREN K. HOLBROOK
DIRECTOR, PORTFOLIO REGULATORY STRATEGY AND SUPPORT
DUKE ENERGY BUSINESS SERVICES LLC
ON BEHALF OF DUKE ENERGY INDIANA, LLC
CAUSE NO. 43955 DSM-9
BEFORE THE INDIANA UTILITY REGULATORY COMMISSION**

I. INTRODUCTION AND PURPOSE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Karen K. Holbrook. My business address is 400 South Tryon Street,
Charlotte, North Carolina.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Duke Energy Business Services LLC ("Duke Energy Business
Services"), a service company affiliate of Duke Energy Indiana, LLC ("Duke Energy
Indiana" or "Company") and a subsidiary of Duke Energy Corporation ("Duke Energy"),
as Director, Portfolio Regulatory Strategy and Support. In this capacity, I provide
services to Duke Energy Indiana, LLC and other regulated utility subsidiaries of Duke
Energy Corp.

**Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL
QUALIFICATIONS.**

A. I graduated from Marshall University in 1986 with a Bachelor of Science degree in
Accounting and passed the Certified Public Accounting exam in 1988. I started my
career in 1986 in general accounting for the Kanawha County Parks and Recreation
Commission and was promoted to Controller after two years. I left in 1989 to join
Columbia Gas Transmission, a subsidiary of Columbia Energy Group, Inc. I remained

KAREN K. HOLBROOK

1 with Columbia Gas Transmission until 1999 working in a variety of financial areas
2 including Financial Reporting, Management Discussion & Analysis (for SEC reporting),
3 Operational and Capital Budgeting, Financial Planning, and Economic Analysis. I joined
4 Duke Energy in 1999 and have worked in a variety of financial areas including Financial
5 Planning, Financial Analysis, Corporate Finance, Risk Management, Financial Re-
6 engineering and assumed my current role as Director Program Performance in September
7 2010.

8 **Q. PLEASE BRIEFLY DESCRIBE YOUR DUTIES AND RESPONSIBILITIES AS**
9 **DIRECTOR OF PORTFOLIO REGULATORY STRATEGY AND SUPPORT.**

10 A. In addition to regulatory strategy and stakeholder engagement, I am responsible for
11 tracking performance of Duke Energy's Energy Efficiency and Demand Response ("EE")
12 products, programs, and portfolio including calculation of revenues and impacts, tracking
13 of expenses, and reporting the status of the programs in relation to various mandates and
14 requirements. I also am responsible for the development of the EE budget and five-year
15 plan. These calculations are then used in a variety of filings across multiple jurisdictions.

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

17 A. My testimony discusses the relief sought by the Company. I will also discuss the various
18 calculations performed for this filing and the processes and sources used to develop
19 actual costs of providing programs that were used in the 2019 reconciliation, and the
20 update of programs that were previously used in the 2015, 2016, 2017, and 2018
21 reconciliations.

1 **Q. WHAT PREVIOUS CASES ARE RELEVANT TO THIS FILING?**

2 A. There are eight (8) cases that are relevant to this filing:

- 3 • Cause No. 43955, which approved programs for 2012 and 2013 and
4 established the basic paradigm for Duke Energy Indiana programs.
5 Specifically, it approved recovery of program costs, performance incentives
6 and lost revenues for three (3) years.
- 7 • In Cause No. 43955 DSM-1 ("DSM-1"), the Commission approved a
8 Settlement Agreement between Duke Energy Indiana and the Indiana Office
9 of Utility Consumer Counselor ("OUCC"), which modified the basic
10 paradigm in Cause No. 43955. DSM-1 approved programs for 2014 and lost
11 revenues for the life of the measure dating back to 2012. Duke Energy
12 Indiana also agreed to reconcile estimated lost revenues with actual lost
13 revenues with evaluation, measurement and verification ("EM&V") applied
14 retrospectively to the previous reconciled period for each program.
- 15 • In Cause No. 43955 DSM-2 ("DSM-2"), the Commission again approved a
16 Settlement Agreement between Duke Energy Indiana and the OUCC for 2015
17 programs, which made minor modifications to the Settlement Agreement
18 approved in DSM-1, including changes to the calculation of 2015
19 performance incentives.
- 20 • In Cause No. 43955 DSM-3 ("DSM-3"), although the Company requested
21 approval of Duke Energy Indiana's portfolio of programs for 2016-2018 under
22 Ind. Code § 8-1-8.5-10 ("Section 10"), the Commission approved the portfolio

1 under Ind. Code § 8-1-8.5-9. In doing so, the Commission did not grant a
2 performance incentive and limited the recovery of lost revenues for programs
3 approved in DSM-3 to four (4) years. Performance incentives and lost
4 revenues approved in previous proceedings were unchanged.

5 In June 2017, Cause No. 43955 DSM-3 S1 (“DSM-3 S1”) was
6 approved. This supplemental filing included additional funding and
7 associated lost revenues for the Company’s Smart Saver Non-Residential
8 Prescriptive Program.

- 9 • In Cause No. 43955 DSM-4 (“DSM-4”), issued on December 28, 2017, the
10 Commission approved the Company’s revised 3-year portfolio of energy
11 efficiency programs consistent with its 2015 Integrated Resource Plan,
12 consisting of programs to be offered during calendar years 2017 – 2019. The
13 Commission’s Order approved lost revenues for the life of the measure and a
14 shared savings performance incentive for programs to be offered during the
15 2017-2019 calendar years, the calculation of which I will explain in detail in
16 my testimony.
- 17 • In Cause No. 43955 DSM-5 (“DSM-5”), the Commission approved on July 25,
18 2018, Duke Energy Indiana’s reconciliation of the costs incurred, including
19 lost revenues, for programs for 2016 with amounts actually collected from
20 customers from EE Rider billings. The Commission’s Order also approved
21 updated reconciliation of lost revenues for 2012 through 2015 and authorized
22 Duke Energy Indiana to implement its requested EE Rider adjustment factors,

1 which also included the revenue requirements associated with the forecast for
2 the 2018 programs previously approved as part of the 2017-2019 Plan.

- 3 • In Cause No. 43955 DSM-6 (“DSM-6”), the Commission approved on
4 December 19, 2018, Duke Energy Indiana’s forecasted 2019 program costs,
5 including lost revenues and performance incentives, as well as reconciliation
6 of the 2017 costs incurred, including lost revenues and performance
7 incentives, and re-reconciliations of prior years.
- 8 • Most recently, in Cause No. 43955 DSM-7 (“DSM-7”), the Commission
9 approved on February 26, 2020, Duke Energy Indiana’s 2018 actual costs and
10 energy savings achievements with amounts billed to customers in 2018 in
11 accordance with previous Commission Orders; along with the re-reconciliations
12 for the application of EM&V to lost revenue recovery for 2015, 2016, and 2017.

13 **II. RELIEF SOUGHT**

14 **Q. WHAT RELIEF IS DUKE ENERGY INDIANA SEEKING IN THIS**
15 **PROCEEDING?**

16 A. Duke Energy Indiana is seeking approval to implement revised rider factors under the
17 Company’s Standard Contract Rider No. 66, Energy Efficiency Adjustment (“EE Rider”)
18 that reflect the following:

- 19 • The 2019 reconciliation that has been prepared using actual 2019 costs and
20 energy savings results;
- 21 • Re-reconciliations of 2015, 2016, 2017 and 2018 based on the application of
22 additional EM&V results related to lost revenues; and

- An adjustment to certain costs recorded in 2019 related to 2014, 2017 and 2018 programs to ensure the costs are assigned to the appropriate non-residential opt out groups.

III. UNDERLYING CALCULATIONS FOR THIS FILING

Q. WHAT IS YOUR ORGANIZATION'S ROLE IN PERFORMING CALCULATIONS RELATIVE TO THIS FILING?

A. My organization is responsible for various aspects of the program performance for Duke Energy's EE products, programs and portfolio. Key responsibilities include:

- Tracking performance of Duke Energy's EE products, programs, and portfolio including calculation of revenues and impacts, tracking of expenses, and reporting the status of the programs in relation to various mandates and requirements;
- Development of the EE budget and five-year plan; and
- Support of revenue and impact calculations for new products and programs being developed.

These calculations are used in a variety of filings across multiple jurisdictions.

Q. WHAT TYPES OF CALCULATIONS DID YOUR GROUP PERFORM FOR THIS FILING?

A. My group performed both non-financial and financial calculations consisting of impacts (kWh and kW), program costs, cost recovery revenue, performance incentives and lost revenues for the 2019 and prior year reconciliations.

1 **Q. HOW WERE THE NON-FINANCIAL CALCULATIONS PERFORMED AND**
2 **WHAT WERE THEY USED FOR?**

3 A. We calculated actual impacts (kWh and kW) for each measure for the reconciliations of
4 previous filings. My group performed this using a single participant DSMore file
5 multiplied by actual participation. My group then took those impacts and calculated
6 actual achievement levels, actual avoided costs (when applicable), and actual lost revenue
7 by vintage, or year of participation.

8 **Q. PLEASE EXPLAIN THE TERM “SINGLE PARTICIPANT” AND WHY IT IS**
9 **USED.**

10 A. DSMore is used for both estimating program cost effectiveness, as well as calculating
11 impacts. To calculate cost effectiveness, the total amount of forecasted participation and
12 costs are used with the avoided costs and other relevant calculations for the entire
13 population of forecasted eligible participants. However, for purposes of calculating
14 actual impacts, we receive a DSMore file that calculates the impacts achieved for a single
15 (or each) unit of participation in an EE program. Impacts from this “single participant”
16 file are then multiplied by actual participation to calculate monthly impacts used to
17 calculate avoided cost (when applicable) and lost revenues and achievement level for
18 purposes of determining performance incentive amounts. Impacts reflect EM&V applied
19 as approved in DSM-1.

20 **Q. WHAT FINANCIAL CALCULATIONS DID YOUR GROUP PERFORM FOR**
21 **THIS FILING?**

A. We gathered actual program costs and calculated cost recovery revenue, performance incentive amounts and lost revenue for the 2019 reconciliation and updates to the 2015 – 2018 reconciliations.

IV. 2019 RECONCILIATION

Q. PLEASE EXPLAIN WHAT COMMISSION ORDERS ARE RELEVANT TO THE 2019 RECONCILIATION.

A. For 2019, the Company was operating under authority granted in Cause No. 43955 DSM-4.

Q. WHAT DID THE COMMISSION APPROVE IN TERMS OF COST RECOVERY IN CAUSE NO. 43955 DSM-4?

A. In that proceeding, the Commission approved the recovery of program costs, lost revenues for the life of the measure, and the following shared savings performance incentive structure tied to tiered levels of energy savings achieved versus the as filed target and the net present value of the net benefits of the Utility Cost Test (“UCT”) for each of its programs.

Performance Incentives	
Achievement Level (kWh)	Incentive Level (NPV of net benefits of UCT)
110%	10%
100-109.99%	8%
90-99.99%	7%
80-89.99%	6%
75-79.99%	5%
0-74.99%	0%

1 **Q. WHAT COSTS DID YOUR GROUP CALCULATE TO INCLUDE AS INPUT TO**
2 **THE REVENUE REQUIREMENT INCLUDED IN MS. LILLY'S RATE**
3 **CALCULATIONS?**

4 A. As shown on Petitioner's Exhibit 1-E, we calculated all relevant aspects of costs and
5 performance in 2019. These calculations include impacts as measured in gross kWh,
6 both at the plant and at the meter; cost recovery revenue, including program costs and
7 M&V costs; utility incentive, as further described below and shown in more detail on
8 Petitioner's Exhibit 1-G; and prior period and current period lost revenues.

9 **Q. PLEASE EXPLAIN HOW THE 2019 ACTUAL PROGRAM COSTS WERE**
10 **DETERMINED.**

11 A. All relevant costs (expenses) for the programs are recorded in our General Ledger as they
12 are incurred, including program costs, EM&V and administrative overhead costs by
13 program and type of cost. Duke Energy Program Managers review costs charged to their
14 programs monthly to ensure that the costs are recorded correctly. For purposes of the
15 2019 reconciliation and Duke Energy Indiana witness Ms. Kathryn C. Lilly's use in
16 developing rates for the various non-residential opt-out groups, we also reviewed all
17 charges to determine if any costs recorded in 2019 for accounting purposes were
18 applicable to prior program years. We then took all relevant charges recorded to the
19 programs in 2019 from the General Ledger and categorized them as shown on
20 Petitioner's Exhibit 1-E.

21 **Q. HOW WERE INCENTIVES CALCULATED?**

1 A. In accordance with the Final Order in DSM-4 and as shown on Petitioner's Exhibit 1-G,
2 the net present value of the net benefits of the UCT was calculated for each program. A
3 comparison was made between adjusted actual achievement and target achievement
4 calculated as described above for each program. An achievement percentage was then
5 calculated by dividing the actual adjusted achievement by the achievement targets for the
6 year. That achievement percentage was then used to determine the shared savings
7 performance incentive by multiplying the UCT benefits by the applicable shared savings
8 percentage associated with the achievement level. Petitioner's Exhibit 1-G shows the
9 calculations of the amounts of incentives earned by program.

10 **Q. UNDER THE AUTHORITY GRANTED IN DSM-4, WHAT 2019 PROGRAMS**
11 **AND COSTS ARE ELIGIBLE FOR THE PERFORMANCE INCENTIVE?**

12 A. For 2019, all programs are eligible for a performance incentive with the exception of
13 Low Income Neighborhood.

14 **Q. PLEASE EXPLAIN HOW 2019 LOST REVENUES WERE CALCULATED.**

15 A. To calculate lost revenues for the participation in 2019, we began with the single
16 participant DSMore files as described above. We used impacts for each participant (kWh
17 and kW) at the meter, net of free riders. We applied all EM&V received by June 30,
18 2020, and then applied the EM&V retrospectively for the purposes of calculating lost
19 revenue, per the Agreement approved in DSM-1. The table below shows what EM&V
20 has been applied retroactively to lost revenue calculations in 2019, and what years were
21 impacted.

<u>Program / Product</u>	<u>Date Complete</u>	<u>Years Effective for Lost Rev.</u>
Residential Energy Assessments	7/31/2019	2016 – 2018

Actual participation was captured by rate schedule in our participation database and confirmed by Program Managers. We multiplied the impacts per participant by the participation in each measure to calculate annual and monthly kWh and kW. We then applied the appropriate lost revenue rate, provided by the Rates group as described in Ms. Lilly's testimony, to the monthly kWh and kW to derive the lost revenue amount for each program. We used the 2019 lost revenue rates provided by the Rates group that reflected the lower federal tax rates from the 2017 Tax Cuts and Jobs Act to calculate the lost revenues for the full year.

Q. WHAT ADJUSTMENTS DID YOU MAKE TO 2019 COSTS FOR PURPOSES OF PROPER RATEMAKING FOR OPTED OUT GROUPS?

A. We made three (3) adjustments to 2019 costs and provided them to Ms. Lilly for calculation of rates. The first adjustment was to move program costs recorded in 2019 that were applicable to Smart Saver[®] Non-Residential Prescriptive offered in 2017 and 2018. For this adjustment, we used the Application Received or Order date as appropriate.

The second adjustment was to move EM&V costs recorded in 2019 for programs to the applicable periods in 2017 and 2018 based on the period of customer sampling.

The third adjustment was a correction to move the 2015 vintage persisting Lost Revenue associated with the C&I Rebate program to the 2014 vintage persisting Lost

1 Revenue to reflect participation in the 2014 opt out period. All the adjustments are
2 shown on Petitioner's Exhibit 1-F.

3 **Q. WHAT ADJUSTMENTS DID YOU MAKE TO THE 2015, 2016, 2017, AND 2018**
4 **RECONCILIATIONS?**

5 A. The 2015, 2016, 2017, and 2018 reconciliations were updated for the application of
6 EM&V to lost revenues. We applied the EM&V listed above retroactively to the lost
7 revenue impacts as approved in DSM-1 and subsequent proceedings. Petitioner's
8 Exhibits 1-A, 1-B, 1-C, and 1-D show the impact of the application of EM&V to lost
9 revenues.

10 **V. CONCLUSION**

11 **Q. WERE PETITIONER'S EXHIBITS 1-A THROUGH 1-G PREPARED BY YOU**
12 **OR AT YOUR DIRECTION?**

13 A. Yes, they were.

Q. DOES THIS CONCLUDE YOUR PREPARED TESTIMONY AT THIS TIME?

14 A. Yes, it does.

		A	B	C	D		E		F	
Program		Filing Updated in 2019 Annual KWH Gross FR, @ Meter Total	Filing Updated in 2020 Annual KWH Gross FR, @ Meter Total	Difference	Filing Updated in 2019 Lost Revenue	Filing Updated in 2020 Lost Revenue	Difference			
Unit Type		KWH	KWH	KWH	\$	\$	\$			
				B-A			E-D			
Core Portfolio										
Res										
Energy Efficiency										
		-	-	-	\$	1,349,174	\$	1,349,174	\$	-
		-	-	-	\$	351,233	\$	351,233	\$	-
		-	-	-	\$	3,357,525	\$	3,357,525	\$	-
		-	-	-	\$	2,827,281	\$	2,827,281	\$	-
	Total	-	-	-	\$	7,885,213	\$	7,885,213	\$	-
NonRes										
Energy Efficiency										
		-	-	-	\$	97,901	\$	97,901	\$	-
		10,060,344	10,060,344	-	\$	4,709,556	\$	4,709,556	\$	-
	Total	10,060,344	10,060,344	-	\$	4,807,458	\$	4,807,458	\$	-
Total Core		10,060,344	10,060,344	-	\$	12,692,671	\$	12,692,671	\$	-
Indiana Core Plus										
Res										
Energy Efficiency										
		1,066,452	1,066,452	-	\$	388,257	\$	388,257	\$	-
		1,585,632	1,585,632	-	\$	193,655	\$	193,655	\$	-
	1/	1,426,503	1,426,503	-	\$	38,995	\$	41,310	\$	2,315
		1,338,876	1,338,876	-	\$	9,621	\$	9,621	\$	-
		522,566	522,566	-	\$	119,087	\$	119,087	\$	-
	2/	32,323,731	32,323,731	-	\$	3,221,902	\$	3,221,902	\$	-
		983,968	983,968	-	\$	36,234	\$	36,234	\$	-
		39,161,094	39,161,094	-	\$	1,201,738	\$	1,201,738	\$	-
	Total	78,408,823	78,408,823	-	\$	5,209,488	\$	5,211,802	\$	2,315
Demand Response										
		-	-	-	\$	-	\$	-	\$	-
	Total	-	-	-	\$	-	\$	-	\$	-
NonRes										
Energy Efficiency										
		23,891,951	23,891,951	-	\$	1,042,420	\$	1,042,420	\$	-
		12,431,199	12,431,199	-	\$	1,554,638	\$	1,554,638	\$	-
	Total	36,323,150	36,323,150	-	\$	2,597,059	\$	2,597,059	\$	-
Total Indiana Core Plus		114,731,973	114,731,973	-	\$	7,806,546	\$	7,808,861	\$	2,315
Total Indiana Portfolio		124,792,317	124,792,317	-	\$	20,499,217	\$	20,501,532	\$	2,315

Notes:

1/ Freeridership correction for M&V previously applied in 2018

2/ My Home Energy Report impacts reflect total annual savings as of December 2015

Month Current Capability Annual KWH Gross FR, @ Meter

Dec - 2015 32,323,731

* Totals may not foot due to rounding

Program		A			B			C			D			E			F		
		Filing Updated in 2019 Annual KWH Gross FR, @ Meter Total			Filing Updated in 2020 Annual KWH Gross FR, @ Meter Total			Difference			Filing Updated in 2019 Lost Revenue			Filing Updated in 2020 Lost Revenue			Difference		
Unit Type		KWH			KWH			KWH B-A			\$			\$			\$ E-D		
Core Portfolio																			
Res																			
Energy Efficiency																			
Home Energy Assessment		-			-			-			\$ 1,304,958			\$ 1,304,958			\$ -		
Income Qualified Weatherization		-			-			-			\$ 348,679			\$ 348,679			\$ -		
Residential Lighting		-			-			-			\$ 3,369,537			\$ 3,369,537			\$ -		
School Energy Efficiency		-			-			-			\$ 2,837,395			\$ 2,837,395			\$ -		
Total		-			-			-			\$ 7,860,570			\$ 7,860,570			\$ -		
NonRes																			
Energy Efficiency																			
School Assessment		-			-			-			\$ 97,824			\$ 97,824			\$ -		
C&I Rebate		-			-			-			\$ 4,712,082			\$ 4,712,082			\$ -		
Total		-			-			-			\$ 4,809,905			\$ 4,809,905			\$ -		
Total Core		-			-			-			\$ 12,670,475			\$ 12,670,475			\$ -		
Indiana Core Plus																			
Res																			
Energy Efficiency																			
Agency Assistance Portal		504,266			504,266			-			\$ 407,776			\$ 407,776			\$ -		
Appliance Recycling Program		21,889			21,889			-			\$ 214,012			\$ 214,012			\$ -		
Energy Education Program for Schools		2/	2,097,996		2,097,996		-		\$ 131,686		\$ 139,504		\$ 7,817						
Low Income Neighborhood		1,440,306			1,440,306			-			\$ 54,733			\$ 54,733			\$ -		
Low Income Weatherization		37,760			37,760			-			\$ 143			\$ 143			\$ -		
Multi-Family EE Products & Services		510,293			510,293			-			\$ 132,461			\$ 132,461			\$ -		
My Home Energy Report		3/	51,585,384		51,585,384		-		\$ 3,529,917		\$ 3,529,917		\$ -						
Residential Energy Assessments		1/	2,196,176		2,196,176		-		\$ 121,256		\$ 149,414		\$ 28,158						
Smart Saver® Residential		48,708,470			48,708,470			-			\$ 2,167,007			\$ 2,167,007			\$ -		
Total		107,102,541			107,102,541			-			\$ 6,758,990			\$ 6,794,966			\$ 35,976		
Demand Response																			
Power Manager®		-			-			-			\$ -			\$ -			\$ -		
Power Manager® for Apartments		-			-			-			\$ -			\$ -			\$ -		
Total		-			-			-			\$ -			\$ -			\$ -		
NonRes																			
Energy Efficiency																			
Small Business Energy Saver		7,017,859			7,017,859			-			\$ 64,645			\$ 64,645			\$ -		
Smart Saver® Non Residential Prescriptive		53,938,823			53,938,823			-			\$ 1,829,716			\$ 1,829,716			\$ -		
Smart Saver for Non-Residential - Custom		34,660,112			34,660,112			-			\$ 1,891,740			\$ 1,891,740			\$ -		
Total		95,616,795			95,616,795			-			\$ 3,786,102			\$ 3,786,102			\$ -		
Demand Response																			
Power Manager® for Business		-			-			-			\$ -			\$ -			\$ -		
Total		-			-			-			\$ -			\$ -			\$ -		
Total Indiana Core Plus		202,719,335			202,719,335			-			\$ 10,545,092			\$ 10,581,067			\$ 35,976		
Total Indiana Portfolio		202,719,335			202,719,335			-			\$ 23,215,567			\$ 23,251,543			\$ 35,976		

Notes:

- 1/ EMV received and applied retrospectively for the purposes of lost revenues
2/ Free ridership corrected in 2019 for M&V applied in 2018.
3/ My Home Energy Report impacts reflect total annual savings as of December 2016
Current Capability Annual KWH Gross FR, @ Meter

Month 51,585,384
Dec - 2016

* Totals may not foot due to rounding

Program	Unit Type	A	B	C	D	E	F
		Filing Updated in 2019 Annual KWH Gross FR, @ Meter Total	Filing Updated in 2020 Annual KWH Gross FR, @ Meter Total	Difference	Filing Updated in 2019 Lost Revenue	Filing Updated in 2020 Lost Revenue	Difference
		KWH	KWH	KWH B-A	\$	\$	\$ E-D
Core Portfolio							
Legacy Programs							
Res							
Energy Efficiency							
Home Energy Assessment		-	-	-	\$ 1,255,702	\$ 1,255,702	\$ -
Income Qualified Weatherization		-	-	-	\$ 354,696	\$ 354,696	\$ -
Residential Lighting		-	-	-	\$ 3,003,843	\$ 3,003,843	\$ -
School Energy Efficiency		-	-	-	\$ 2,886,231	\$ 2,886,231	\$ -
Total		-	-	-	\$ 7,500,473	\$ 7,500,473	\$ -
NonRes							
Energy Efficiency							
School Assessment		-	-	-	\$ 96,104	\$ 96,104	\$ -
C&I Rebate		-	-	-	\$ 4,260,519	\$ 4,260,519	\$ -
Total		-	-	-	\$ 4,356,622	\$ 4,356,622	\$ -
Total		-	-	-	\$ 11,857,095	\$ 11,857,095	\$ -
Shared Savings Portfolio							
Res							
Energy Efficiency							
Agency Assistance Portal		1,357,098	1,357,098	-	\$ 425,927	\$ 425,927	\$ -
Appliance Recycling Program		-	0	-	\$ 217,791	\$ 217,791	\$ -
Energy Education Program for Schools	2/	1,958,331	1,958,331	-	\$ 245,619	\$ 260,200	\$ 14,581
Low Income Neighborhood		1,439,246	1,439,246	-	\$ 107,781	\$ 107,781	\$ -
Low Income Weatherization		196,466	196,466	-	\$ 6,846	\$ 6,846	\$ -
Multi-Family EE Products & Services		481,233	481,233	-	\$ 143,386	\$ 143,386	\$ -
My Home Energy Report	3/	57,199,463	57,199,463	-	\$ 3,901,321	\$ 3,901,321	\$ -
Residential Energy Assessments	1/	2,771,558	2,771,558	-	\$ 246,364	\$ 382,643	\$ 136,279
Smart Saver® Residential		51,079,670	51,079,670	-	\$ 3,385,794	\$ 3,385,794	\$ -
Total		116,483,065	116,483,065	-	\$ 8,680,830	\$ 8,831,689	\$ 150,860
Demand Response							
Power Manager®		-	-	-	\$ -	\$ -	\$ -
Total		-	-	-	\$ -	\$ -	\$ -
NonRes							
Energy Efficiency							
Small Business Energy Saver		21,910,917	21,910,917	-	\$ 758,911	\$ 758,911	\$ -
Smart Saver® Non-Residential		46,080,257	46,080,257	-	\$ 6,170,223	\$ 6,170,223	\$ -
Total		67,991,174	67,991,174	-	\$ 6,929,134	\$ 6,929,134	\$ -
Demand Response							
Power Manager® for Business		245,686	245,686	-	\$ 3,450	\$ 3,450	\$ -
Total		245,686	245,686	-	\$ 3,450	\$ 3,450	\$ -
Other							
Cost Recovery Only							
Market Potential Study		-	-	-	\$ -	\$ -	\$ -
Total		-	-	-	\$ -	\$ -	\$ -
Total		184,719,925	184,719,925	-	\$ 15,613,413	\$ 15,764,273	\$ 150,860
Total		184,719,925	184,719,925	-	\$ 27,470,508	\$ 27,621,368	\$ 150,860

Notes:

1/ EMV received and applied retrospectively for the purposes of lost revenues

2/ Free ridership corrected in 2019 for M&V applied in 2018.

3/ My Home Energy Report impacts reflect total annual savings as of December 2017

Month Current Capability Annual KWH Gross FR, @ Meter

Dec - 2017 57,199,463

* Totals may not foot due to rounding

Program	Unit Type	A		B		C		D		E		F	
		Filing Updated in 2019		Filing Updated in 2020		Difference		Filing Updated in 2019		Filing Updated in 2020		Difference	
		Annual KWH Gross FR, @ Meter Total	Annual KWH Gross FR, @ Meter Total	Annual KWH Gross FR, @ Meter Total	Annual KWH Gross FR, @ Meter Total			Lost Revenue	Lost Revenue			Lost Revenue	Lost Revenue
		KWH	KWH	KWH	B-A			\$	\$	\$	\$	\$	E-D
Core Portfolio													
Res													
Energy Efficiency													
Home Energy Assessment	1/	-	-	-		\$	745,123	\$	764,483	\$		19,361	
Income Qualified Weatherization	1/	-	-	-		\$	327,219	\$	334,620	\$		7,401	
Residential Lighting	1/	-	-	-		\$	1,725,858	\$	1,764,048	\$		38,190	
School Energy Efficiency	1/	-	-	-		\$	1,338,602	\$	1,368,222	\$		29,621	
Total		-	-	-		\$	4,136,801	\$	4,231,374	\$		94,572	
NonRes													
Energy Efficiency													
School Assessment	1/	-	-	-		\$	75,655	\$	75,629	\$		(26)	
C&I Rebate	1/	-	-	-		\$	3,208,346	\$	3,206,335	\$		(2,011)	
Total		-	-	-		\$	3,284,001	\$	3,281,965	\$		(2,037)	
Total Core		-	-	-		\$	7,420,803	\$	7,513,338	\$		92,536	
Indiana Core Plus													
Res													
Energy Efficiency													
Agency Assistance Portal	1/	2,539,361	2,539,361	-		\$	297,064	\$	303,804	\$		6,740	
Appliance Recycling Program	1/	-	0	-		\$	189,790	\$	194,468	\$		4,678	
Energy Education Program for Schools	1/2/	2,098,099	2,098,099	-		\$	314,782	\$	341,435	\$		26,653	
Low Income Neighborhood	1/	851,363	851,363	-		\$	135,975	\$	139,030	\$		3,055	
Low Income Weatherization	1/	171,963	171,963	-		\$	14,031	\$	14,351	\$		320	
Multi-Family EE Products & Services	1/	499,638	499,638	-		\$	92,890	\$	95,131	\$		2,241	
My Home Energy Report	1/ 4/	53,675,539	53,675,539	-		\$	3,634,550	\$	3,725,691	\$		91,141	
Residential Energy Assessments	1/ 3/	2,303,258	2,303,258	-		\$	328,310	\$	558,085	\$		229,775	
Smart Saver® Residential	1/	59,398,193	59,398,193	-		\$	4,346,737	\$	4,454,087	\$		107,349	
Total		121,537,413	121,537,413	-		\$	9,354,130	\$	9,826,082	\$		471,952	
Demand Response													
Power Manager®		-	-	-		\$	-	\$	-	\$		-	
Power Manager® for Apartments		-	-	-		\$	-	\$	-	\$		-	
Total		-	-	-		\$	-	\$	-	\$		-	
NonRes													
Energy Efficiency													
Small Business Energy Saver	1/	19,485,798	19,485,798	-		\$	1,460,234	\$	1,467,005	\$		6,771	
Smart Saver® Non-Residential	1/	73,758,382	73,758,382	-		\$	7,932,317	\$	7,935,918	\$		3,601	
Total		93,244,180	93,244,180	-		\$	9,392,551	\$	9,402,923	\$		10,372	
Demand Response													
Power Manager® for Business	1/	878,669	878,669	-		\$	21,624	\$	21,751	\$		127	
Total		878,669	878,669	-		\$	21,624	\$	21,751	\$		127	
Total Indiana Core Plus		215,660,262	215,660,262	-		\$	18,768,305	\$	19,250,755	\$		482,450	
Total Indiana Portfolio		215,660,262	215,660,262	-		\$	26,189,108	\$	26,764,093	\$		574,986	

Notes:

- 1/ Updated for corrected lost revenue rates
2/ Free ridership corrected in 2019 for M&V applied in 2018.
3/ EMV received and applied retrospectively for the purposes of lost revenues
4/ My Home Energy Report impacts reflect total annual savings as of December 2018
Month Current Capability Annual KWH Gross FR, @ Meter
Dec - 2018 53,675,539

* Totals may not foot due to rounding

		Impacts		Cost Recovery														
	Program	A	B	C	D	E	F	G	H	I								
		Annual KWH Gross FR, @ Meter Total	Annual KWH Gross FR, @ Plant Total	Program Costs	M&V Costs	Total Costs	Utility Incentive	Prior Period Lost Revenue	Lost Revenue	Revenue Requirement Input								
		KWH	KWH	\$	\$	\$	\$	\$	\$	\$								
		data	data	data	data	C+D	UCT Net Benefits x Tiered %	data	data	SUM(E:H)								
Legacy Programs		Monthly Lost Revenue kWh																
Res																		
Energy Efficiency																		
	Home Energy Assessment	-	-	\$	-	\$	-	\$	-	\$	267,105	\$	-	\$	267,105			
	Income Qualified Weatherization	-	-	\$	-	\$	-	\$	-	\$	197,481	\$	-	\$	197,481			
	Residential Lighting	-	-	\$	-	\$	-	\$	-	\$	477,878	\$	-	\$	477,878			
	School Energy Efficiency	-	-	\$	-	\$	-	\$	-	\$	426,065	\$	-	\$	426,065			
	Total	-	-	0	\$	-	\$	-	\$	-	\$	1,368,529	\$	-	\$	1,368,529		
NonRes																		
Energy Efficiency																		
	School Assessment	-	-	\$	-	\$	-	\$	-	\$	59,384	\$	-	\$	59,384			
	C&I Rebate	-	-	\$	-	\$	-	\$	-	\$	3,209,539	\$	-	\$	3,209,539			
	Total	-	-	0	\$	-	\$	-	\$	-	\$	3,268,922	\$	-	\$	3,268,922		
Total		-	-	0	\$	-	\$	-	\$	-	\$	4,637,451	\$	-	\$	4,637,451		
Shared Savings Portfolio																		
Res																		
Energy Efficiency																		
	Agency Assistance Portal	1,089,907	1,177,387	\$	143,300	\$	-	\$	143,300	\$	24,057	\$	193,009	\$	35,794	\$	396,159	
	Appliance Recycling Program	-	-	\$	-	\$	-	\$	-	\$	-	\$	151,151	\$	-	\$	151,151	
	Energy Education Program for Schools	2,225,728	2,404,374	\$	608,032	\$	-	\$	608,032	\$	130,030	\$	377,505	\$	48,476	\$	1,164,042	
	Low Income Neighborhood	1,029,300	1,111,916	\$	444,255	\$	37,500	\$	481,755	\$	13,045	\$	160,175	\$	22,005	\$	676,979	
	Low Income Weatherization	158,812	171,559	\$	164,611	\$	-	\$	164,611	\$	-	\$	17,401	\$	4,444	\$	186,457	
	Multi-Family EE Products & Services	960,633	1,037,737	\$	179,648	\$	-	\$	179,648	\$	48,435	\$	64,378	\$	20,928	\$	313,389	
	My Home Energy Report	1/ 44,662,044	48,246,799	\$	3,007,211	\$	-	\$	3,007,211	\$	26,647	\$	1,696,201	\$	2,132,085	\$	6,862,144	
	Residential Energy Assessments	3,522,140	3,804,841	\$	877,645	\$	54,000	\$	931,645	\$	271,523	\$	614,831	\$	110,096	\$	1,928,095	
	Smart Saver® Residential	59,898,572	64,706,271	\$	9,261,892	\$	114,243	\$	9,376,135	\$	2,320,669	\$	5,074,630	\$	1,171,172	\$	17,942,606	
	Total	113,547,136	122,660,883	0	\$	14,686,593	\$	205,743	\$	14,892,336	\$	2,834,405	\$	8,349,281	\$	3,544,998	\$	29,621,021
Demand Response																		
	Power Manager®	-	-	\$	2,172,559	\$	19,890	\$	2,192,449	\$	509,088	\$	-	\$	-	\$	2,701,537	
	Total	-	-	\$	2,172,559	\$	19,890	\$	2,192,449	\$	509,088	\$	-	\$	-	\$	2,701,537	
NonRes																		
Energy Efficiency																		
	Small Business Energy Saver	12,365,997	13,358,542	\$	3,113,448	\$	-	\$	3,113,448	\$	-	\$	1,794,488	\$	242,871	\$	5,150,807	
	Smart Saver® Non-Residential	61,588,125	66,531,434	\$	9,807,438	\$	37,645	\$	9,845,083	\$	4,289,889	\$	8,858,493	\$	822,683	\$	23,816,148	
	Total	73,954,122	79,889,976	0	\$	12,920,886	\$	37,645	\$	12,958,530	\$	4,289,889	\$	10,652,981	\$	1,065,554	\$	28,966,955
Demand Response																		
	Power Manager® for Business	1,180,658	1,275,423	\$	1,143,413	\$	53,000	\$	1,196,413	\$	29,847	\$	45,348	\$	29,156	\$	1,300,764	
	Total	1,180,658	1,275,423	\$	1,143,413	\$	53,000	\$	1,196,413	\$	29,847	\$	45,348	\$	29,156	\$	1,300,764	
Other																		
Cost Recovery Only																		
	Market Potential Study	-	-	\$	5,280	\$	-	\$	5,280	\$	-	\$	-	\$	-	\$	5,280	
	Total	-	-	\$	5,280	\$	-	\$	5,280	\$	-	\$	-	\$	-	\$	5,280	
Total		188,681,917	203,826,282	0	\$	30,928,730	\$	316,278	\$	31,245,008	\$	7,663,229	\$	19,047,611	\$	4,639,708	\$	62,595,556
Total		188,681,917	203,826,282	0	\$	30,928,730	\$	316,278	\$	31,245,008	\$	7,663,229	\$	23,685,062	\$	4,639,708	\$	67,233,000

Notes:
1/ My Home Energy Report impacts reflect total annual savings as of December 2019
Month Current Capability Annual KWH Gross FR, @ Meter
Dec - 2018 44,662,044

* Totals may not foot due to rounding

Portfolio	Program	2019 Program and EM&V Costs	2019 Program Costs	2019 M&V Costs	2019 Costs Applicable to 2019 - Program Costs	2019 Costs Applicable to 2019 - M&V Costs	2019 Costs Applicable to 2018 - Program Costs	2019 Costs Applicable to 2018 - M&V Costs	2019 Costs Applicable to 2017 - Program Costs	2019 Costs Applicable to 2017 - M&V Costs	2019 Costs Applicable to 2016 - Program Costs	2019 Costs Applicable to 2016 - M&V Costs	2019 Costs Applicable to 2015 - Program Costs	2019 Costs Applicable to 2015 - M&V Costs	2019 Costs Applicable to 2014 - Program Costs	2019 Costs Applicable to 2014 - M&V Costs
					2019	2019	2018	2018	2017	2017	2016	2016	2015	2015	April - December 2014	April - December 2014
Indiana	Smart Saver® Non-Residential	\$	9,807,438	\$	-	29,288	\$	924,090	\$	6,216	\$	-	\$	-	\$	-
		\$	9,807,438	\$	-	29,288	\$	924,090	\$	6,216	\$	-	\$	-	\$	-

		2019 Lost Revenue Dollars	2019 Lost Revenue Applicable to 2014	2019 Lost Revenue Applicable to 2014
Portfolio	Program		April-December 2014	January-March 2014
Core	C&I Rebate	\$	335,745	\$ -
Core Total		\$	335,745	\$ -

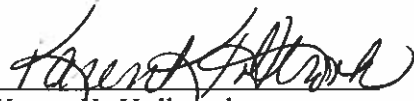
1/ Adjustments to Program & EM&V Costs were made to properly assign 2019 costs for those opted out customers who remain liable for those costs in accordance with the Company's tariff first approved in Cause No. 44441.

* Totals may not foot due to rounding

Program	Costs	Achievement			Avoided Costs				
	A	B	C	D	E	F	G	H	I
	Total Cost / Cost Recovery Actual	Annual KWH/KW Gross FR, @ Meter Total	KWH/KW Gross FR @ Meter As Filed YTD	Achievement level	Actual Avoided Costs	UCT Net Benefits	UCT Score	Incentive Level	Total Shared Savings Pool Incentive
	UI Actual	UI Actual	As Filed	B/C	UI Actual	E-A	E/A		F*H
Agency Assistance Portal	\$ 143,300	1,089,907	978,018	111%	\$ 383,868	\$ 240,568	2.68	10.00%	\$ 24,057
Energy Efficient Appliances	\$ -	-	118,798	0%	\$ -	\$ -	n/a	0.00%	\$ -
Low Income Neighborhood	\$ 481,755	1,029,300	821,250	125%	\$ 612,206	\$ 130,451	1.27	10.00%	\$ 13,045
Low Income Weatherization	\$ 164,611	158,812	683,988	23%	\$ 184,065	\$ 19,453	1.12	0.00%	\$ -
Energy Education Program for Schools	\$ 608,032	2,225,728	2,097,200	106%	\$ 2,233,401	\$ 1,625,370	3.67	8.00%	\$ 130,030
Manufactured Home Retrofit	\$ -	-	86,925	0%	\$ -	\$ -	n/a	0.00%	\$ -
Multi-Family EE Products & Services	\$ 179,648	960,633	279,710	343%	\$ 663,998	\$ 484,350	3.70	10.00%	\$ 48,435
Multifamily Retrofit	\$ -	-	135,650	0%	\$ -	\$ -	n/a	0.00%	\$ -
Residential Energy Assessments	\$ 931,645	3,522,140	2,210,454	159%	\$ 3,646,873	\$ 2,715,228	3.91	10.00%	\$ 271,523
Residential New Construction	\$ -	-	699,988	0%	\$ -	\$ -	n/a	0.00%	\$ -
Smart Saver® Residential	\$ 9,376,135	59,898,572	41,438,660	145%	\$ 32,582,823	\$ 23,206,688	3.48	10.00%	\$ 2,320,669
My Home Energy Report	\$ 3,007,211	44,662,044	57,970,337	77%	\$ 3,540,145	\$ 532,934	1.18	5.00%	\$ 26,647
Bring Your Own Thermostat	\$ -	-	12,252	0%	\$ -	\$ -	n/a	0.00%	\$ -
Power Manager®	\$ 2,192,449	62,499	66,371	94%	\$ 9,465,136	\$ 7,272,687	4.32	7.00%	\$ 509,088
Duke Portfolio - Residential Total	\$ 17,084,785	113,609,635	107,599,602		\$ 53,312,515	\$ 36,227,730			\$ 3,343,493
Power Manager® for Business	\$ 1,196,413	7,639	10,085	76%	\$ 1,793,348	\$ 596,936	1.50	5.00%	\$ 29,847
Small Business Energy Saver	\$ 3,113,448	12,365,997	18,799,721	66%	\$ 10,808,278	\$ 7,694,830	3.47	0.00%	\$ -
Smart Saver® Non-Residential	\$ 9,845,083	61,588,125	51,538,501	119%	\$ 52,743,975	\$ 42,898,892	5.36	10.00%	\$ 4,289,889
Duke Portfolio - Non-Residential Total	\$ 14,154,943	73,961,762	70,348,306		\$ 65,345,601	\$ 51,190,658			\$ 4,319,736
Market Potential Study	\$ 5,280	-							\$ -
Duke Portfolio - Grand Total	\$ 31,245,008	187,571,396	177,947,908	105%	\$ 118,658,117	\$ 87,418,388	3.80		\$ 7,663,229

VERIFICATION

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

Signed: 
Karen K. Holbrook

Dated: 08/19/2020