

**DIRECT TESTIMONY OF KATHRYN C. LILLY  
RATES & REGULATORY STRATEGY MANAGER  
DUKE ENERGY INDIANA, LLC  
CAUSE NO. 43955 DSM-9  
BEFORE THE INDIANA UTILITY REGULATORY COMMISSION**

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Kathryn C. Lilly, and my business address is 1000 East Main Street,  
Plainfield, Indiana 46168.

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

A. I am employed by Duke Energy Indiana, LLC ("Duke Energy Indiana," or "Company")  
as Rates & Regulatory Strategy Manager. Duke Energy Indiana is a wholly owned,  
indirect subsidiary of Duke Energy Corporation.

**Q. PLEASE DESCRIBE YOUR DUTIES AS RATES & REGULATORY STRATEGY  
MANAGER.**

A. As Rates & Regulatory Strategy Manager, I am responsible for the preparation of  
financial and accounting data used in the Company's rate filings.

**Q. STATE YOUR EDUCATIONAL AND BUSINESS EXPERIENCE.**

A. I am a graduate of Indiana State University, holding a Bachelor of Science Degree in  
Business, with a major in Accounting. Since my employment in 1986 with the Company  
(then known as Public Service Company of Indiana, Inc.), I have held various financial  
and accounting positions supporting the Company and its affiliates. I have held positions  
in Corporate Accounting, Project Management, Payroll, Budgets and Forecast, along with

1 numerous financial system implementation teams. I am a Certified Public Accountant

2 (“CPA”) and a member of the Indiana CPA Society.

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

4 A. The purpose of my testimony in this proceeding is to explain and support the  
5 development of proposed rates under the Company’s Standard Contract Rider No. 66,  
6 Energy Efficiency Adjustment (“EE Rider” or the “Rider”) and to present updated Tariffs  
7 for Commission approval of these rates. I will: 1) discuss the ratemaking treatment that  
8 has been approved for the EE Rider in Cause No. 43955 and subsequent Cause No.  
9 43955 DSM Rider filings; 2) explain how non-residential rates were developed  
10 considering those who opted out and opted back in for qualifying customers pursuant to  
11 Senate Enrolled Act 340 (“SEA 340”); 3) discuss the components of the rates proposed in  
12 this proceeding, which include:

- 13 • The 2019 reconciliation that has been prepared using actual 2019 costs,  
14 participation and energy savings results;
- 15 • Re-reconciliations of 2015, 2016, 2017 and 2018 lost revenues based on the  
16 application of additional Evaluation, Measurement & Verification (“EM&V”)  
17 results;
- 18 • An adjustment for certain costs recorded in 2019 related to 2014, 2017 and  
19 2018 programs to ensure the costs are assigned to the appropriate non-  
20 residential opt out group, as discussed in the Testimony of Ms. Karen K.  
21 Holbrook;
- 22 • Forecasted costs for calendar year 2021, as requested in DSM-8.

1 4) provide estimated rate impacts of the rates proposed; and 5) explain the methodology  
2 used to determine the lost revenue prices provided to Petitioner's witness Ms. Holbrook  
3 that were used to develop the lost revenue amounts included in the filing.

4 **Q. PLEASE SUMMARIZE THE CUSTOMER IMPACT OF THIS FILING.**

5 A. Replacing the 2018 reconciliation amounts with the 2019 reconciliation will result in an  
6 increase to residential rates as compared to the compliance filing rates (IURC Cause No.  
7 45253). For non-residential customers, it provides for lower rates for the majority of the  
8 opt-out/opt-in groupings as compared to the compliance filing rates (IURC Cause No.  
9 45253).

10 **II. RATEMAKING TREATMENT**

11 **Q. PLEASE SUMMARIZE HOW CUSTOMERS ARE CHARGED FOR EE**  
12 **PROGRAMS UNDER THE EE RIDER PURSUANT TO THE VARIOUS**  
13 **COMMISSION ORDERS RELEVANT TO THIS PROCEEDING.**

14 A. As approved in the Commission's Order in Cause No. 43955 ("EE Order") and  
15 subsequent Orders in Cause Nos. 43079 DSM-6, 44441 ("Opt Out Order"), 43955 DSM-  
16 1 ("DSM-1"), DSM-2, DSM-3, DSM-4, DSM-5, DSM-6 and DSM-7 (collectively, the  
17 Company's EE Orders), all customers and rate classes are charged for the cost of a  
18 vintage year's EE programs to the extent they are or were eligible to participate in the  
19 programs offered for that period.<sup>1</sup> The ratemaking model approved by the Commission  
20 for the EE Rider provides that residential customers, as a group, pay for the cost of

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<sup>1</sup> Costs for a vintage year's programs may extend beyond that vintage year or the time customers were eligible to participate in the programs, such as in the case of persisting lost revenues or for the costs of EM&V performed in a subsequent year for a prior vintage year's programs.

residential programs (*i.e.*, all customers in the residential group pay the same rate per kWh) and non-residential customers, as a group, pay for the cost of non-residential programs for which they are or were eligible to participate in (*i.e.*, all participating customers in the non-residential group pay the same rate per kWh and all customers in each of the opt-out/opt-in/opt-out again groups pay the same rate per kWh).

**Q. PLEASE FURTHER DESCRIBE THE RATEMAKING TREATMENT THAT HAS BEEN APPROVED IN THE COMPANY'S EE ORDERS.**

A. Other cost recovery and ratemaking concepts approved for use in the EE Rider include:

- Cost assignment to residential and non-residential rate groups based on the programs offered to each group and, within the non-residential rate group, based on whether and when customers were eligible to participate in the programs or whether and when customers opted out or in of participation;<sup>2</sup>
- Inclusion of all customers in paying for the programs, including interruptible load to the extent not specifically excluded by contract language for customers with special contracts; and
- Rate development methodologies that include the use of kWh sales as billing determinants.

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<sup>2</sup> The enactment of SEA 340 in 2014 allows qualifying customers with a load of more than one megawatt measured at a demand meter at a single site to opt out of participation. An opted-out customer will not be responsible for paying for current and future energy efficiency programs, but will be responsible for any costs (or entitled to any credits) related to programs offered up to the effective date of opt out. SEA 340 also allows qualifying customers to opt back in to EE program participation, but they must pay participant rates for three program years before being eligible to opt out again. This will require the development of rates for multiple groups of non-residential customers based on their opt-out/opt-in status. The rates will be developed using the same methodology and concepts I explain in my testimony, but the costs and billing determinants used will be specific to each group of customers.

**Q. PLEASE EXPLAIN DUKE ENERGY INDIANA’S EXPERIENCE WITH CUSTOMER OPT OUTS.**

**Q. PLEASE EXPLAIN THE DEVELOPMENT OF THE PROPOSED RATES IN CONSIDERATION OF THESE VARIOUS OPT-OUT/OPT-IN/OPT-OUT GROUPS.**

1 A. Using 2019 data, customers participating in 2020 EE programs comprise forty-seven  
2 percent (47%) of total Non-Residential kWh sales. These customers either did not meet  
3 the eligibility requirements to opt out or have never opted out. Another approximately  
4 one percent (1%) had opted out at some point but had subsequently opted back in and  
5 were also eligible to participate in 2020 EE programs. Customers remaining opted out  
6 for 2020 programs approximate fifty-two percent (52%) of total Non-Residential kWh  
7 sales. Proposed rates have been developed in this proceeding for each of the existing  
8 participating and opt-out/opt-in groups based on the timing of their opt-out or opt-in,  
9 using the 2019 kWh for each group to allocate applicable costs and the revenues  
10 associated with each group to perform the 2019 reconciliation.

11 **Q. PLEASE EXPLAIN WHAT COSTS CUSTOMERS WHO OPT OUT ARE**  
12 **RESPONSIBLE FOR PAYING.**

13 A. Consistent with the requirements of I.C. § 8-1-8.5-9(f), although an eligible customer  
14 who opts out is not responsible for costs of current or future EE programs, the customer  
15 remains responsible for EE program costs, including lost revenues, shareholder incentives  
16 and related reconciliations, that accrued or were incurred or relate to energy efficiency  
17 investments made before the date on which the opt out is effective, regardless of the date  
18 on which the rates are actually assessed.

19 These groups will continue to be responsible in future years for their  
20 proportionate share of any adjustments, reconciliations, and persisting lost revenues  
21 related to the EE programs offered during the years they were eligible to participate in EE  
22 programs, whether as an initial participant or an opt-in participant. They will not be

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1 responsible for costs, adjustments, reconciliations, and persisting lost revenues related to  
2 the EE programs offered during the years they were opted out from participation.

3 As approved by the Commission in the Company's EE Orders, the lost revenues  
4 associated with the 2012 – 2015 program years will be included in EE Rider rates until  
5 the measure life is expired for the individual programs or until rates are effective from a  
6 base rate case. As approved by the Commission in DSM-3, the lost revenues associated  
7 with the 2016 program year will be included in EE Rider rates for the lesser of four (4)  
8 years or measure life, or until rates are effective from a base rate case. As approved by  
9 the Commission in DSM-4, for 2017 – 2019 program years lost revenue will be included  
10 in EE Rider rates until the end of the measure life for the individual programs or until  
11 rates are effective from a base rate case. With the approval of the new base rates in  
12 IURC Cause No. 45253, persisting lost revenue amounts for calendar years 2012 through  
13 2019 were reset to \$0 for forecasting 2021 rates. As approved in DSM-1, the lost  
14 revenues for all these years are also subject to additional reconciliations in future years  
15 due to retrospective application of EM&V.

16 Also, as outlined in Ms. Diana Douglas Revised Direct Testimony in Cause No.  
17 45253, vintage years 2012 – 2015 have been fully reconciled for non-residential  
18 customers. For Non-Residential customers who opted out of EE programs effective  
19 4/1/2014 and 1/1/2015, and have not opted back in, there will be no further reconciliation  
20 of EE rider costs required, and their EE rider rate will remain zero if they remain opted  
21 out.

Any qualifying customers new to our system who sign a demand contract of more than one (1) megawatt and provide notice of opt out under the terms of the Tariff will not be responsible for any EE Rider costs (*i.e.*, will have a zero Tariff rate).

**Q. HOW DID THE OPT OUT REQUIREMENTS AFFECT THE CALCULATION OF THE RATES PROPOSED FOR REVISED 2021?**

A. It was necessary to calculate separate rates for each opt-out/opt-in group, because each group is responsible for a different set of costs based on effective dates of the opt outs or opt ins. The applicable costs and load and timing outlined above were used to develop rates for each of the opt-out/opt-in groups.

**IV. PROPOSED RATES AND RATE IMPACTS**

**Q. PLEASE EXPLAIN HOW THE REVISED RATES WERE DEVELOPED.**

A. For the reconciliation component, Ms. Karen K. Holbrook provided me with recoverable program costs, EM&V costs, lost revenues and incentive amounts for 2019, based on actual costs incurred and participation and energy savings attained; updated lost revenue amounts for the re-reconciliation of 2015, 2016, 2017 and 2018; and adjustments applicable to 2014, 2017 and 2018 opt-out groups. For the revised 2021 rates, 2021 estimated program cost, EM&V costs, lost revenues and incentives previously requested in DSM-8 were used. Persisting lost revenues for 2012 through 2019 have been removed due to new base rates implemented in 2020 (IURC Cause No. 45253). As Ms. Holbrook explains, the costs included in the rates incorporate the results of EM&V for calculating lost revenues and performance incentives, pursuant to the approved Settlement Agreements in DSM-1 and DSM-2 and the Commission's Orders in 43955 through



1 43955 DSM-7. The 2019 kWh and billed revenues for the 2019 reconciliation were

2 obtained from the Company's accounting records.

3 **Q. PLEASE DESCRIBE PETITIONER'S EXHIBIT 2-A.**

4 A. Petitioner's Exhibit 2-A, Pages 1 – 36, represents an update of Duke Energy Indiana's  
5 Standard Contract Rider No. 66, Energy Efficiency Adjustment to be effective for billing  
6 after Commission approval. Pages 1 through 5 include information regarding the  
7 calculation of the adjustment, including definitions of the components of the formula for  
8 developing the EE Adjustment factors, and provisions regarding opting out and opting  
9 back in. Page 6 shows the revenue adjustment factors by retail rate group for  
10 participating customers, based on the information contained in Petitioner's Exhibit 2-B,  
11 Pages 8 and 9. Petitioner's Exhibit 2-B, Page 9, is the source for Pages 7 – 35. Pages 7  
12 through 13 and pages 20 through 21 show the adjustment factors by retail rate group for  
13 qualifying customers who have opted out in prior opt out windows. Page 14 provides the  
14 adjustment factors by retail rate group for qualifying customers who may opt out  
15 effective January 1, 2021. Pages 15 through 19 show the adjustment factors by retail rate  
16 group for each group of previously opted out customers who have opted back in to  
17 participation in a previous opt-out/opt-in window. Pages 22 through 34 show the  
18 adjustment factors for those customers who may choose to either opt out or opt in during  
19 the next opt-out/opt-in window. Page 35 shows the revenue adjustment factors by retail  
20 rate group for qualifying customers new to the system who sign a demand contract of  
21 more than one (1) MWh who opt out and who will pay a zero rate. Page 36 shows the  
22 billing cycle kWh for the twelve (12) months ended December 2019.

1   **Q.   PLEASE DESCRIBE PETITIONER'S EXHIBIT 2-B.**

2   A.   Petitioner's Exhibit 2-B, Pages 1 – 10, is a series of schedules developing the rates that  
3       are presented for Commission approval in this proceeding. Page 1 shows the estimated  
4       EE costs, by cost category, for the EE programs, with separate subtotals by type of  
5       program (conservation or demand response). As shown, the total estimated cost (before  
6       conversion to revenue requirements) for EE programs is approximately \$47.4 million.  
7       The 2021 costs shown on this Exhibit were used in Petitioner's Exhibit 2-B, Pages 8 (for  
8       Residential) and 9 (for Non-Residential) to develop the rates presented for approval by  
9       the Commission.

10           Page 2 shows the actual recoverable 2019 EE costs, by cost category, for the  
11       programs offered in 2019, with separate subtotals by type of program (conservation or  
12       demand response). As shown, the total estimated cost (before conversion to revenue  
13       requirements) for programs in 2019 is approximately \$67.2 million. The 2019 costs  
14       shown on this Exhibit were used in Petitioner's Exhibit 2-B, Page 3 for Residential and  
15       Page 4 for Non-Residential to develop the 2019 reconciliation variance amounts for each  
16       opt out or participating group to be included in the rates presented for approval by the  
17       Commission.

18           Page 3 for Residential and Page 4 for Non-Residential present the reconciliation  
19       of the actual 2019 costs (including lost revenues and earned incentives) from Page 2, to  
20       the actual 2019 billed revenues for Rider 66. Page 5 provides kWh-based allocations to  
21       the various opt out groups that are used in the Page 4 calculations of the Non-Residential  
22       reconciliation amounts. The costs and revenues for Non-Residential customers were

1 shown at a more granular level of detail than for Residential customers to facilitate the  
2 ratemaking required for those who opted out, resulting in allocation of revenue  
3 requirements based on what period the costs relate to and using the billed revenues for  
4 each group. On page 4, the Company calculated separate reconciliation amounts for: (1)  
5 customers eligible to participate in 2021 programs; (2) customers who opted-out in a  
6 prior opt-out effective date or who have opted-out/opted-in/opted-out; and (3) customers  
7 who opted out and subsequently opted back in.

8 **Q. WHAT ARE THE OTHER DRIVERS FOR THE 2019 RECONCILIATION**  
9 **(OVER)/UNDER-COLLECTION AMOUNTS?**

10 A. Differences in 2019 program spending, participation and kWh/kW energy savings  
11 achievement levels for conservation and demand response programs from the previous  
12 forecasted amounts for 2019 contribute to the reconciliation variances. As discussed by  
13 Ms. Holbrook, the development of the performance incentives and lost revenue amounts  
14 included in the 2019 reconciliation reflected actual participation and the available results  
15 of EM&V in determining the kWh savings amounts used in the calculations. Differences  
16 in kWh sales used in developing the factors that were billed during 2019 and the actual  
17 kWh sales for 2019 also contribute to the reconciliation amounts.

18 This resulted in an over-billing reconciliation variance for 2019 for Residential  
19 customers, and an under-billing reconciliation variance for 2019 for Non-Residential  
20 customers. However, the under-billing position is less than the amount filed in DSM-7,  
21 resulting in a decrease to the majority of the proposed rates for 2020 for Non-Residential  
22 customers.

1 Q. PLEASE DESCRIBE THE REMAINING PAGES OF PETITIONER'S EXHIBIT

2 2-B.

3 A. Page 6 presents additional reconciliations of 2015, 2016, 2017 and 2018 EE program lost  
4 revenues using additional EM&V results received since the Company's DSM-7 filing.  
5 These additional reconciliations were made necessary due to the approval of the  
6 Settlement Agreement in DSM-1 and subsequent DSM proceeding approvals, which  
7 require retrospective application of EM&V for purposes of determining the amount of  
8 lost revenues to be recovered.

9 Page 7 adjusts certain costs recorded in 2019 that are related to 2014, 2017 and  
10 2018 programs. This adjustment was made to ensure the costs are assigned to the  
11 appropriate non-residential opt out group based on the EE program vintage year the costs  
12 were related to. These adjustments are discussed in the Testimony of Ms. Holbrook.

13 Page 8 uses the 2021 estimated costs from Page 1, the 2019 reconciliation  
14 variance from Page 3, and the additional prior years' reconciliation amounts from Pages 6  
15 to determine the proposed 2021 EE Adjustment factor for Residential customers. A  
16 revenue conversion factor to cover revenue-related taxes and expenses was applied to all  
17 cost categories except lost revenues and reconciliation amounts. Lost revenue rates used  
18 to develop the lost revenue amounts were already at a revenue requirement level, so  
19 additional gross-up for ratemaking was not required. The prior year re-reconciliation  
20 true-ups and the 2019 reconciliation were also already at the revenue requirement level  
21 and did not need additional conversion to cover revenue related taxes and expenses.

1           Page 9 shows the rate development for Non-Residential customers, which uses the  
2           2021 estimated costs from Page 1, the 2019 reconciliation variance from Page 4, and the  
3           additional prior years' reconciliation amounts from Page 6, plus the adjustment on Page 7  
4           and kWh sales allocations from Page 10, and revenue conversion as described for  
5           Residential customers except the lost revenues were shown at a more granular level of  
6           detail than for Residential to facilitate the ratemaking required for customers who have  
7           opted out. The revenue requirements for the non-residential rate group were then  
8           allocated among participants and each of the applicable opt-out/opt-in groups based on  
9           what period the costs relate to and using the 2019 kWh sales for each group.

10           The proposed 2021 adjustment factors for these groups were developed on Pages  
11           8 and 9 by dividing the revenue requirement for the residential and non-residential rate  
12           groups by the applicable twelve (12) months ending December 2019 billing cycle kWh  
13           sales amounts.

14   **Q.   PLEASE DESCRIBE PETITIONER'S EXHIBIT 2-C.**

15   A.   Petitioner's Exhibit 2-C provides information regarding the rate impact of the rate  
16           adjustment factors developed in Petitioner's Exhibit 2-B. Page 1 shows that, should the  
17           Commission approve the revised Rider 66 rates, rates for Residential customers will  
18           increase and most Non-Residential customer groups will decrease as compared to the  
19           current DSM-7 rates as modified in the compliance filing in IURC Cause No. 45253.  
20           Differences for each Non-Residential opt-out/opt-in group are due to the individual  
21           reconciliation of each group using kWh sales, revenues, and the specific cost allocations  
22           applicable to each group.

1           Page 2 shows the monthly impact on the bill of a typical residential customer  
2           using 1000 kWh of the change in the Rider 66 rates should the Commission approve the  
3           revised rates. Such residential customer can expect to see a \$0.91, or 0.72%, increase in  
4           their current monthly bill.

5           I would note that the rate impacts shown in Petitioner's Exhibit 2-C were  
6           developed without any consideration for the positive impact to customer bills from the  
7           lower energy usage that is expected to result from participation in these programs, both in  
8           absolute individual usage reductions for those who choose to participate in program  
9           offerings and in lower overall energy usage for native load customers, which will reduce  
10          fuel and other variable production costs that are included in customer rates.

11   **Q.   WHAT AMENDMENTS TO DUKE ENERGY INDIANA'S RATE SCHEDULES**  
12   **ARE PROPOSED IN THIS PROCEEDING?**

13   A.   Upon Commission approval, the Company is proposing to update its Standard Contract  
14          Rider No. 66, First Revised Sheet No. 66, Pages 1 through 36 (Petitioner's Exhibit 2-A,  
15          Pages 1 through 36) subject to Duke Energy Indiana's filing of the updated Rider 66  
16          Tariff Sheet with the Commission's Electricity Division and begin billing the revised  
17          2021 rates effective with the first billing cycle of the month following Commission  
18          approval and Order in this proceeding.

19                   **V. LOST REVENUE PRICING**

20   **Q.   PLEASE EXPLAIN THE METHOD USED TO DETERMINE THE PRICES (OR**  
21   **LOST REVENUE PRICING RATES) USED TO DEVELOP THE AMOUNT OF**  
22   **ACTUAL LOST REVENUES INCLUDED IN THIS FILING FOR**

1       **RECONCILIATION PURPOSES.**

2       A.     As approved by the Commission in its EE Order, recovery of lost revenues is intended to  
3       reimburse the Company for fixed costs that will otherwise not be recovered because of  
4       the reduction in sales associated with its EE offerings. In this filing, Duke Energy  
5       Indiana used lost revenue pricing rates (*i.e.*, rates reflecting fixed costs embedded in base  
6       rates) that were developed for each rate schedule in the Residential and Non-Residential  
7       rate groups that had identified participation. In the few cases where rate schedule level  
8       data was not available, average lost revenue pricing rates were developed using the rate  
9       schedules most likely to be applicable to the customers served by the programs. The  
10      Company's general methodology for developing lost revenue prices is as follows:

- 11           • For rate schedules designed to recover all fixed charges via a demand rate, the  
12           Tariff demand rate was used to price kW savings impacts.
- 13           • For rate schedules designed to recover a portion of the fixed charges in the  
14           demand rate and a portion in the energy rate, the Tariff demand rate was used  
15           to price kW savings impacts, and the Tariff energy rate was adjusted to  
16           remove the fuel and other variable O&M included in the Tariff rate and then  
17           used to price kWh savings impacts.
- 18           • For rate schedules designed to recover all fixed charges in the energy rate, the  
19           Tariff energy rate was adjusted to remove fuel and other variable O&M and  
20           then used to price kWh savings impacts.
- 21           • For rate schedules designed with no demand charge and using a block energy  
22           rate structure, base rate revenues (with no Rider revenues included) were

1 adjusted to remove customer charges and the amount of fuel and variable  
2 O&M included (based on the amount per kWh that was included in base  
3 rates), then this remaining fixed charge amount was divided by kWh sales to  
4 get an average fixed charge rate realization, which was applied to kWh sales.

5 Support for the pricing used for the 2019 reconciliation is being filed in  
6 Workpaper 6 (KCL). The source of the fuel and other variable O&M adjustments was  
7 the Company's cost of service study approved in Cause No. 42359, and the source of the  
8 revenue and kWh data was the Company's billing system.

9 The same general methodology using the applicable 2015, 2016, 2017 and 2018  
10 data was used to develop the lost revenue pricing used in determining the 2015, 2016,  
11 2017 and 2018 lost revenues that were trued up in this filing, support for which was filed  
12 in DSM-3, DSM-4, DSM-5, DSM-6 and DSM-7.

13 For purposes of the 2015 - 2018 re-reconciliations, the base rates used are the  
14 rates approved in Cause No. 42359 that were billed during those periods and that  
15 properly reflected the pre-Tax Act thirty-five percent (35%) federal income tax rate.

16 The Testimony of Ms. Holbrook explains how she used the prices I provided her  
17 for determining actual lost revenues for reconciliation purposes.

18 **Q. HOW WILL THE LOST REVENUE RATES YOU DEVELOPED FOR USE BY**  
19 **MS. HOLBROOK CHANGE WITH THE ISSUANCE OF THE FINAL ORDER IN**  
20 **CAUSE NO. 45253?**

21 A. The Company intends to adjust the lost revenue pricing rates at the time new base rates  
22 are approved and implemented.



**VI. CONCLUSION**

**Q. DOES THE COMPANY INTEND TO CONTINUE USING THE DEFERRAL ACCOUNTING TREATMENT DISCUSSED AND APPROVED IN CAUSE NO. 43955?**

A. Yes. The Company is requesting the Commission's approval to continue to use deferral accounting for energy efficiency expenses and revenues, as appropriate, to minimize the timing difference between cost or revenue recognition on the Company's books and actual cost recovery.

**Q. WERE PETITIONER'S EXHIBITS 2-A THROUGH AND INCLUDING 2-C PREPARED BY YOU OR UNDER YOUR SUPERVISION?**

A. Yes, they were.

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

A. Yes, it does.

Duke Energy Indiana, LLC  
1000 East Main Street  
Plainfield, Indiana 46168

IURC NO. 15  
First Revised Sheet No. 66  
Cancels and Supersedes  
Original Sheet No. 66  
Page 1 of 36

**STANDARD CONTRACT RIDER NO. 66 -  
ENERGY EFFICIENCY ADJUSTMENT**

The applicable charges for electric service to the Company's retail electric customers shall include an adjustment to recover or refund energy efficiency amounts as approved by the Indiana Utility Regulatory Commission. The applicable retail electric adjustment will be determined based on the following provisions:

**Calculation of Adjustment**

The monthly billing adjustment shall be determined by multiplying the adjustment factor, as determined to the nearest 0.001 mill (\$0.000001) per kilowatt-hour calculated in accordance with the following formula, by the monthly billed kilowatt-hours in the case of customers receiving metered service and by the estimated monthly billed kilowatt-hours used for rate determinations in the case of customers receiving unmetered service.

Energy Efficiency Adjustment Factor =

$$\text{Residential} = \frac{(a*g)+c}{e}$$

$$\text{Non-Residential} = \frac{(b*g)+d}{f}$$

where:

1. "a" is the sum of estimated residential energy efficiency amounts excluding lost revenue.
2. "b" is the sum of estimated non-residential energy efficiency amounts excluding lost revenue.
3. "c" is the sum of estimated residential energy efficiency lost revenue.
4. "d" is the sum of estimated non-residential energy efficiency lost revenue.
5. "e" is the applicable billing cycle kilowatt-hour sales for residential customers.
6. "f" is the applicable billing cycle kilowatt-hour sales for non-residential customers.
7. "g" is the revenue conversion factor that includes the Public Utility Fee and Uncollectible Expense.

Estimated energy efficiency amounts shall be further modified to reflect the difference between estimated amounts billed and actual amounts.

Separate billing adjustments shall be determined for Qualifying Customers who have opted out from participation in energy efficiency programs under the terms of this tariff based on the effective date of such opt out. Such billing adjustments will contain only the energy efficiency amounts, consisting of program costs, lost revenues and shareholder incentives, and related reconciliations, applicable to periods prior to the effective date of opt out, as further defined herein.

Separate billing adjustments shall also be determined for Qualifying Customers who have opted out from participation in energy efficiency programs under the terms of this tariff, but subsequently opted back in to

**Issued:**

**Effective:**

**Duke Energy Indiana, LLC**  
1000 East Main Street  
Plainfield, Indiana 46168

**IURC NO. 15**  
First Revised Sheet No. 66  
Cancels and Supersedes  
Original Sheet No. 66  
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**STANDARD CONTRACT RIDER NO. 66 -  
ENERGY EFFICIENCY ADJUSTMENT**

participation in energy efficiency programs under the terms of this tariff, based on the effective dates of such opt out and opt in. Such billing adjustments will contain only the energy efficiency amounts, consisting of program costs, lost revenues and shareholder incentives, and related reconciliations, applicable to periods prior to the effective date of opt out and subsequent to the effective date of opt in, as further defined herein.

**Opt Out Provisions**

In order for a Customer to qualify to opt out from participation in energy efficiency programs under the terms of this tariff, all of the following conditions must be satisfied:

1. A Qualifying Customer must receive service at a Single Site constituting more than one megawatt of electric capacity.
2. The Qualifying Customer must be able to demonstrate that at least one demand meter on its Single Site has received service of more than one megawatt of electric capacity within the previous 12 months or must be a new customer who has signed a written demand contract of greater than one megawatt for at least one meter on a Single Site.
3. If a Customer has a Single Site with Qualifying Load, it may opt out all accounts receiving service at that Single Site which are billed non-residential rates. Such accounts will be opted out provided the Customer identifies the accounts in the Customer's notice to the Company of its election to opt out and provided that at least one account at the Single Site that qualified above by virtue of having more than one megawatt of electric capacity is among the accounts identified to opt out and provided that all accounts at the Single Site on a common rate have the same opt out/opt in status.
4. The Qualifying Customer must provide written notice by completing a form provided by Duke Energy Indiana, LLC, or by providing written notice to Duke Energy Indiana, LLC, in substantially the same format as the form provided. A customer who provides written notice of its desire to opt out without using the form will be asked to complete the opt out form in a timely manner consistent with the terms of this tariff, but the notice date of the customer opt out will be the date of its original notice. The notice must:
  - a. indicate the Customer's desire to opt out of energy efficiency programs
  - b. provide a listing of all qualifying accounts for each Single Site which the Customer intends to opt out
    - i. a qualifying account is either one that is demonstrated to have received service of more than one megawatt of electric capacity at a meter at a Single Site as outlined above in item 2. or an account located on contiguous property at the same site and which is billed a non-residential rate
    - ii. at least one qualifying account which was demonstrated to have received service of more than one megawatt of electric capacity at the Single Site must opt out in order for other smaller qualifying accounts at the Single Site to opt out
    - iii. all accounts on the same rate as the qualifying account of more than one megawatt that opts out will also be required to opt out

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- iv. any other qualifying account on a different non-residential rate may also be opted out, but all accounts on the same rate at the Single Site must also opt out
  - c. contain confirmation that the signatory has authority to make that decision for the Customer
5. Written notice must be received by Duke Energy Indiana, LLC on or before November 15 of any year to be effective January 1 of the following year.

Once qualification is determined by Duke Energy Indiana, LLC, the utility will not revoke the Qualifying Customer's qualification at a later date. Qualifying Customers do not need to provide additional notice or otherwise demonstrate continued eligibility annually in order to maintain the opt out status for future energy efficiency program years, except as outlined herein for Qualifying Customers who opted back in and then wish to opt out again.

As of the effective date of the opt out, the Qualifying Customer is no longer eligible to participate in any energy efficiency program for the qualified account(s) and is not eligible to receive incentive payments for energy efficiency projects previously approved but not completed as of the effective date of the opt out.

The Qualifying Customer will be billed the approved opt out rate applicable to their effective date of opt out beginning with the first bill rendered after the effective date of opt out, unless an opt out rate has not yet been approved by the Commission for the effective date of opt out. In that case, the customer will be billed the then approved opt out rate applicable to the latest opt out effective date beginning with the first bill rendered after the Qualifying Customer's effective date of opt out until an opt out rate is approved applicable to the Qualifying Customer's effective date. The Qualifying Customer will then be billed the approved opt out rate applicable to their effective date of opt out beginning with the first bill rendered after the effective date of the approved rate.

The Qualifying Customer remains liable for energy efficiency program costs, including lost revenues, shareholder incentives and related reconciliations, that accrued or were incurred or relate to energy efficiency investments made before the date on which the opt out is effective, regardless of the date on which the rates are actually assessed. Such costs may include costs related to evaluation, measurement and verification ("EM&V") required to be conducted after a customer opts out on projects completed under an Energy Efficiency Program while the customer was a participant. In addition, such costs may include costs required by contracts executed prior to the effective date of opt out but incurred after the date of the Qualifying Customer's opt out. However, these costs shall be limited to fixed, administrative costs, including costs related to EM&V. A Qualifying Customer shall not be responsible for any program costs such as the payment of energy efficiency rebates or incentives, incurred following the effective date of its opt out with the exception of incentives or rebates that are paid on applications that have not closed out at the effective date of its opt out.

**Opt In Provisions for Qualifying Customers**

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A Qualifying Customer who opts out under the terms of this tariff may opt back in to participation in energy efficiency programs by providing written notice which must be received by Duke Energy Indiana, LLC on or before November 15 of any year for participation to be effective January 1 of the following year.

A Qualifying Customer who opts back in is required to participate in the program for at least three years and pay related program costs including lost revenues and incentives for three years after the effective date of opting back in. The Qualifying Customer will also continue to pay for energy efficiency amounts applicable to periods prior to the effective date of their opt out.

In order to opt back in to participation, the Qualifying Customer must provide written notice by completing a form provided by Duke Energy Indiana, LLC, or by providing written notice to Duke Energy Indiana, LLC, in substantially the same format as the form provided, which:

1. unequivocally indicates the Customer's desire to opt back in to energy efficiency programs
2. provides a listing of all qualifying accounts for each Single Site which the Customer intends to opt back in to the energy efficiency programs
  - a. only the qualifying accounts/sites listed will be opted back in to the energy efficiency programs
  - b. a Customer opting back in an account at a Single Site must also opt back in all other accounts with the same common rate at the Single Site
  - c. a Customer may not opt back in the account which by virtue of having more than one megawatt of electric capacity qualified the Customer to opt out other accounts at the Single Site without also opting back in all other accounts at the Single Site
3. contains a statement that the Customer understands that by opting in, it is required to participate in the program for at least three years and pay related costs including lost revenues and incentives
4. contains confirmation that the signatory has authority to make that decision for the Customer.

The Qualifying Customer will be billed the rate applicable to the effective dates of their opt out and opt in beginning with the first bill rendered after both the effective date of the opt in and the effective date of an approved rate applicable to the effective dates of their opt out and opt in.

A Qualifying Customer who opts back in may only opt out again effective January 1 of the year following the third year of participation by providing notice on or before November 15 of the third year of participation. In Order to opt out again, the following conditions must be satisfied:

1. A Qualifying Customer must demonstrate that at least one demand meter on its Single Site has received service of more than one megawatt of electric capacity within the previous 12 months.
2. The Qualifying Customer must provide written notice by completing a form provided by Duke Energy Indiana, LLC, or by providing written notice to Duke Energy Indiana, LLC, in substantially the same format as the form provided, which:
  - a. indicates the Customer's desire to opt out of energy efficiency programs
  - b. provides a listing of all qualifying accounts for each Single Site which the Customer intends to opt out

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- i. a qualifying account is either one that is demonstrated to have received service of more than one megawatt of electric capacity at a meter at a Single Site as outlined above in item 1. or an account located on contiguous property at the same site and which is billed a non-residential rate
  - ii. at least one qualifying account which was demonstrated to have received service of more than one megawatt of electric capacity at the Single Site must opt out in order for other smaller qualifying accounts at the Single Site to opt out
  - iii. all accounts on the same rate as the qualifying account of more than one megawatt that opts out will also be required to opt out
  - iv. any other qualifying account on a different non-residential rate may also be opted out, but all accounts on the same rate at the Single Site must also opt out
- c. contains confirmation that the signatory has authority to make that decision for the Customer.

As of the effective date of the opt out, the Qualifying Customer is no longer eligible to participate in any energy efficiency program for the qualified account(s) and is not eligible to receive incentive payments for energy efficiency projects previously approved but not completed as of the effective date of the opt out.

A Qualifying Customer who elects to opt back out after the three-year period following opt in shall be responsible for energy efficiency program costs, including lost revenues, shareholder incentives and related reconciliations as outlined in the Opt Out Provisions section of this tariff for all periods other than the periods for which an opt out was effective.

The Qualifying Customer will be billed the rate applicable to the effective dates of their opt outs and opt in beginning with the first bill rendered after both the effective date of the opt out and the effective date of an approved rate applicable to the effective dates of their opt outs and opt in.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for customers who are not eligible to opt out or are eligible to opt out but who have not opted out under the terms of this tariff shall be as follows:

**Rates for Participating Customers**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.001795	1
2	Rates CS and FOC	\$0.003017	2
3	Rate LLF	\$0.003017	3
4	Rate HLF <sup>1/</sup>	\$0.003017	4
5	Customer L <sup>2/</sup>	\$0.003017	5
6	Customer O - Firm	\$0.003017	6
7	Customer O - Interruptible	\$0.003017	7
8	Rate WP	\$0.003017	8
9	Rate SL	\$0.003017	9
10	Rate MHLS	\$0.003017	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.003017	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.003017	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have opted out in accordance with the terms of this tariff with an April 1, 2014 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective April 1, 2014**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000000	2
3	Rate LLF	\$0.000000	3
4	Rate HLF <sup>1/</sup>	\$0.000000	4
5	Customer L <sup>2/</sup>	\$0.000000	5
6	Customer O - Firm	\$0.000000	6
7	Customer O - Interruptible	\$0.000000	7
8	Rate WP	\$0.000000	8
9	Rate SL	\$0.000000	9
10	Rate MHLS	\$0.000000	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000000	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000000	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**Rates for Qualifying Customers Who Opted Out Effective January 1, 2015**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000000	2
3	Rate LLF	\$0.000000	3
4	Rate HLF <sup>1/</sup>	\$0.000000	4
5	Customer L <sup>2/</sup>	\$0.000000	5
6	Customer O - Firm	\$0.000000	6
7	Customer O - Interruptible	\$0.000000	7
8	Rate WP	\$0.000000	8
9	Rate SL	\$0.000000	9
10	Rate MHLS	\$0.000000	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000000	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000000	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**Rates for Qualifying Customers Who Opted Out Effective January 1, 2016**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000043	2
3	Rate LLF	\$0.000043	3
4	Rate HLF <sup>1/</sup>	\$0.000043	4
5	Customer L <sup>2/</sup>	\$0.000043	5
6	Customer O - Firm	\$0.000043	6
7	Customer O - Interruptible	\$0.000043	7
8	Rate WP	\$0.000043	8
9	Rate SL	\$0.000043	9
10	Rate MHLS	\$0.000043	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000043	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000043	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have opted out in accordance with the terms of this tariff with a January 1, 2017 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2017**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000033	2
3	Rate LLF	\$0.000033	3
4	Rate HLF <sup>1/</sup>	\$0.000033	4
5	Customer L <sup>2/</sup>	\$0.000033	5
6	Customer O - Firm	\$0.000033	6
7	Customer O - Interruptible	\$0.000033	7
8	Rate WP	\$0.000033	8
9	Rate SL	\$0.000033	9
10	Rate MHLS	\$0.000033	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000033	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000033	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have opted out in accordance with the terms of this tariff with a January 1, 2018 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2018**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000150	2
3	Rate LLF	\$0.000150	3
4	Rate HLF <sup>1/</sup>	\$0.000150	4
5	Customer L <sup>2/</sup>	\$0.000150	5
6	Customer O - Firm	\$0.000150	6
7	Customer O - Interruptible	\$0.000150	7
8	Rate WP	\$0.000150	8
9	Rate SL	\$0.000150	9
10	Rate MHLS	\$0.000150	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000150	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000150	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have opted out in accordance with the terms of this tariff with a January 1, 2019 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2019**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000108	2
3	Rate LLF	\$0.000108	3
4	Rate HLF <sup>1/</sup>	\$0.000108	4
5	Customer L <sup>2/</sup>	\$0.000108	5
6	Customer O - Firm	\$0.000108	6
7	Customer O - Interruptible	\$0.000108	7
8	Rate WP	\$0.000108	8
9	Rate SL	\$0.000108	9
10	Rate MHLS	\$0.000108	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000108	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000108	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have opted out in accordance with the terms of this tariff with a January 1, 2020 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2020**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000567	2
3	Rate LLF	\$0.000567	3
4	Rate HLF <sup>1/</sup>	\$0.000567	4
5	Customer L <sup>2/</sup>	\$0.000567	5
6	Customer O - Firm	\$0.000567	6
7	Customer O - Interruptible	\$0.000567	7
8	Rate WP	\$0.000567	8
9	Rate SL	\$0.000567	9
10	Rate MHLS	\$0.000567	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000567	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000567	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who opt out in accordance with the terms of this tariff with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opt Out Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000362	2
3	Rate LLF	\$0.000362	3
4	Rate HLF <sup>1/</sup>	\$0.000362	4
5	Customer L <sup>2/</sup>	\$0.000362	5
6	Customer O - Firm	\$0.000362	6
7	Customer O - Interruptible	\$0.000362	7
8	Rate WP	\$0.000362	8
9	Rate SL	\$0.000362	9
10	Rate MHLS	\$0.000362	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000362	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000362	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

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**Rates for Qualifying Customers Who Opted Out Effective April 1, 2014  
And Opted Back In Effective January 1, 2016**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002485	2
3	Rate LLF	\$0.002485	3
4	Rate HLF <sup>1/</sup>	\$0.002485	4
5	Customer L <sup>2/</sup>	\$0.002485	5
6	Customer O - Firm	\$0.002485	6
7	Customer O - Interruptible	\$0.002485	7
8	Rate WP	\$0.002485	8
9	Rate SL	\$0.002485	9
10	Rate MHLS	\$0.002485	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002485	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002485	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

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**Rates for Qualifying Customers Who Opted Out Effective April 1, 2014  
And Opted Back In Effective January 1, 2017**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.003407	2
3	Rate LLF	\$0.003407	3
4	Rate HLF <sup>1/</sup>	\$0.003407	4
5	Customer L <sup>2/</sup>	\$0.003407	5
6	Customer O - Firm	\$0.003407	6
7	Customer O - Interruptible	\$0.003407	7
8	Rate WP	\$0.003407	8
9	Rate SL	\$0.003407	9
10	Rate MHLS	\$0.003407	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.003407	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.003407	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2015 effective date and opted in with a January 1, 2017 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2015  
And Opted Back In Effective January 1, 2017**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.003125	2
3	Rate LLF	\$0.003125	3
4	Rate HLF <sup>1/</sup>	\$0.003125	4
5	Customer L <sup>2/</sup>	\$0.003125	5
6	Customer O - Firm	\$0.003125	6
7	Customer O - Interruptible	\$0.003125	7
8	Rate WP	\$0.003125	8
9	Rate SL	\$0.003125	9
10	Rate MHLS	\$0.003125	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.003125	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.003125	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2015 effective date and opted in with a January 1, 2018 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2015  
And Opted Back In Effective January 1, 2018**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002416	2
3	Rate LLF	\$0.002416	3
4	Rate HLF <sup>1/</sup>	\$0.002416	4
5	Customer L <sup>2/</sup>	\$0.002416	5
6	Customer O - Firm	\$0.002416	6
7	Customer O - Interruptible	\$0.002416	7
8	Rate WP	\$0.002416	8
9	Rate SL	\$0.002416	9
10	Rate MHLS	\$0.002416	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002416	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002416	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2015 effective date and opted in with a January 1, 2019 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2015  
And Opted Back In Effective January 1, 2019**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002775	2
3	Rate LLF	\$0.002775	3
4	Rate HLF <sup>1/</sup>	\$0.002775	4
5	Customer L <sup>2/</sup>	\$0.002775	5
6	Customer O - Firm	\$0.002775	6
7	Customer O - Interruptible	\$0.002775	7
8	Rate WP	\$0.002775	8
9	Rate SL	\$0.002775	9
10	Rate MHLS	\$0.002775	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002775	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002775	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2020 effective date after opting out with an April 1, 2014 effective date and opting in with a January 1, 2017 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2020  
After Opting Out Effective April 1, 2014 and Opting In Effective January 1, 2017**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000645	2
3	Rate LLF	\$0.000645	3
4	Rate HLF <sup>1/</sup>	\$0.000645	4
5	Customer L <sup>2/</sup>	\$0.000645	5
6	Customer O - Firm	\$0.000645	6
7	Customer O - Interruptible	\$0.000645	7
8	Rate WP	\$0.000645	8
9	Rate SL	\$0.000645	9
10	Rate MHLS	\$0.000645	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000645	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000645	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**Rates for Qualifying Customers Who Opted Out Effective January 1, 2020  
After Opting Out Effective January 1, 2015 and Opting In Effective January 1, 2017**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000368	2
3	Rate LLF	\$0.000368	3
4	Rate HLF <sup>1/</sup>	\$0.000368	4
5	Customer L <sup>2/</sup>	\$0.000368	5
6	Customer O - Firm	\$0.000368	6
7	Customer O - Interruptible	\$0.000368	7
8	Rate WP	\$0.000368	8
9	Rate SL	\$0.000368	9
10	Rate MHLS	\$0.000368	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000368	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000368	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with an April 1, 2014 effective date and opt in with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective April 1, 2014  
And Opt Back In Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002655	2
3	Rate LLF	\$0.002655	3
4	Rate HLF <sup>1/</sup>	\$0.002655	4
5	Customer L <sup>2/</sup>	\$0.002655	5
6	Customer O - Firm	\$0.002655	6
7	Customer O - Interruptible	\$0.002655	7
8	Rate WP	\$0.002655	8
9	Rate SL	\$0.002655	9
10	Rate MHLS	\$0.002655	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002655	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002655	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2015 effective date and opt in with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2015  
And Opt Back In Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002655	2
3	Rate LLF	\$0.002655	3
4	Rate HLF <sup>1/</sup>	\$0.002655	4
5	Customer L <sup>2/</sup>	\$0.002655	5
6	Customer O - Firm	\$0.002655	6
7	Customer O - Interruptible	\$0.002655	7
8	Rate WP	\$0.002655	8
9	Rate SL	\$0.002655	9
10	Rate MHLS	\$0.002655	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002655	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002655	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2016 effective date and opt in with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2016  
And Opt Back In Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002698	2
3	Rate LLF	\$0.002698	3
4	Rate HLF <sup>1/</sup>	\$0.002698	4
5	Customer L <sup>2/</sup>	\$0.002698	5
6	Customer O - Firm	\$0.002698	6
7	Customer O - Interruptible	\$0.002698	7
8	Rate WP	\$0.002698	8
9	Rate SL	\$0.002698	9
10	Rate MHLS	\$0.002698	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002698	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002698	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2017 effective date and opt in with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2017  
And Opt Back In Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002688	2
3	Rate LLF	\$0.002688	3
4	Rate HLF <sup>1/</sup>	\$0.002688	4
5	Customer L <sup>2/</sup>	\$0.002688	5
6	Customer O - Firm	\$0.002688	6
7	Customer O - Interruptible	\$0.002688	7
8	Rate WP	\$0.002688	8
9	Rate SL	\$0.002688	9
10	Rate MHLS	\$0.002688	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002688	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002688	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2018 effective date and opt in with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2018  
And Opt Back In Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002805	2
3	Rate LLF	\$0.002805	3
4	Rate HLF <sup>1/</sup>	\$0.002805	4
5	Customer L <sup>2/</sup>	\$0.002805	5
6	Customer O - Firm	\$0.002805	6
7	Customer O - Interruptible	\$0.002805	7
8	Rate WP	\$0.002805	8
9	Rate SL	\$0.002805	9
10	Rate MHLS	\$0.002805	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002805	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002805	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2019 effective date and opt in with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2019  
And Opt Back In Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.002763	2
3	Rate LLF	\$0.002763	3
4	Rate HLF <sup>1/</sup>	\$0.002763	4
5	Customer L <sup>2/</sup>	\$0.002763	5
6	Customer O - Firm	\$0.002763	6
7	Customer O - Interruptible	\$0.002763	7
8	Rate WP	\$0.002763	8
9	Rate SL	\$0.002763	9
10	Rate MHLS	\$0.002763	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.002763	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.002763	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opted out with a January 1, 2020 effective date and opt in with a January 1, 2021 effective date shall be as follows:

**Rates for Qualifying Customers Who Opted Out Effective January 1, 2020  
And Opt Back In Effective January 1, 2021**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.003222	2
3	Rate LLF	\$0.003222	3
4	Rate HLF <sup>1/</sup>	\$0.003222	4
5	Customer L <sup>2/</sup>	\$0.003222	5
6	Customer O - Firm	\$0.003222	6
7	Customer O - Interruptible	\$0.003222	7
8	Rate WP	\$0.003222	8
9	Rate SL	\$0.003222	9
10	Rate MHLS	\$0.003222	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.003222	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.003222	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**Rates for Qualifying Customers Who Opt In Effective January 1, 2021**  
**After Opting Out April 1, 2014, Opting In January 1, 2017 and Opting Out January 1, 2020**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.003300	2
3	Rate LLF	\$0.003300	3
4	Rate HLF <sup>1/</sup>	\$0.003300	4
5	Customer L <sup>2/</sup>	\$0.003300	5
6	Customer O - Firm	\$0.003300	6
7	Customer O - Interruptible	\$0.003300	7
8	Rate WP	\$0.003300	8
9	Rate SL	\$0.003300	9
10	Rate MHLS	\$0.003300	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.003300	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.003300	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

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**Rates for Qualifying Customers Who Opt In Effective January 1, 2021**  
**After Opting Out January 1, 2015, Opting In January 1, 2017 and Opting Out January 1, 2020**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.003023	2
3	Rate LLF	\$0.003023	3
4	Rate HLF <sup>1/</sup>	\$0.003023	4
5	Customer L <sup>2/</sup>	\$0.003023	5
6	Customer O - Firm	\$0.003023	6
7	Customer O - Interruptible	\$0.003023	7
8	Rate WP	\$0.003023	8
9	Rate SL	\$0.003023	9
10	Rate MHLS	\$0.003023	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.003023	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.003023	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opt out with a January 1, 2021 effective date after opting out with an April 1, 2014 effective date and opting in with a January 1, 2016 effective date shall be as follows:

**Rates for Qualifying Customers Who Opt Out Effective January 1, 2021  
After Opting Out Effective April 1, 2014 and Opting In Effective January 1, 2016**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	(\$0.000170)	2
3	Rate LLF	(\$0.000170)	3
4	Rate HLF <sup>1/</sup>	(\$0.000170)	4
5	Customer L <sup>2/</sup>	(\$0.000170)	5
6	Customer O - Firm	(\$0.000170)	6
7	Customer O - Interruptible	(\$0.000170)	7
8	Rate WP	(\$0.000170)	8
9	Rate SL	(\$0.000170)	9
10	Rate MHLS	(\$0.000170)	10
11	Rates MOLS and UOLS <sup>3/</sup>	(\$0.000170)	11
12	Rates TS, FS and MS <sup>4/</sup>	(\$0.000170)	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

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The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opt out with a January 1, 2021 effective date after opting out with an April 1, 2014 effective date and opting in with a January 1, 2017 effective date shall be as follows:

**Rates for Qualifying Customers Who Opt Out Effective January 1, 2021  
After Opting Out Effective April 1, 2014 and Opting In Effective January 1, 2017**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000752	2
3	Rate LLF	\$0.000752	3
4	Rate HLF <sup>1/</sup>	\$0.000752	4
5	Customer L <sup>2/</sup>	\$0.000752	5
6	Customer O - Firm	\$0.000752	6
7	Customer O - Interruptible	\$0.000752	7
8	Rate WP	\$0.000752	8
9	Rate SL	\$0.000752	9
10	Rate MHLS	\$0.000752	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000752	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000752	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**Effective:**

Duke Energy Indiana, LLC

1000 East Main Street

Plainfield, Indiana 46168

IURC No. 15

First Revised Sheet No. 66

Cancels and Supersedes

Original Sheet No. 66

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**STANDARD CONTRACT RIDER NO. 66 -  
ENERGY EFFICIENCY ADJUSTMENT**

The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opt out with a January 1, 2021 effective date after opting out with a January 1, 2015 effective date and opting in with a January 1, 2017 effective date shall be as follows:

**Rates for Qualifying Customers Who Opt Out Effective January 1, 2021  
After Opting Out Effective January 1, 2015 and Opting In Effective January 1, 2017**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000470	2
3	Rate LLF	\$0.000470	3
4	Rate HLF <sup>1/</sup>	\$0.000470	4
5	Customer L <sup>2/</sup>	\$0.000470	5
6	Customer O - Firm	\$0.000470	6
7	Customer O - Interruptible	\$0.000470	7
8	Rate WP	\$0.000470	8
9	Rate SL	\$0.000470	9
10	Rate MHLS	\$0.000470	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000470	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000470	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**STANDARD CONTRACT RIDER NO. 66 -  
ENERGY EFFICIENCY ADJUSTMENT**

The Energy Efficiency Adjustment factor applicable to retail rate schedules for Qualifying Customers who have, in accordance with the terms of this tariff, opt out with a January 1, 2021 effective date after opting out with a January 1, 2015 effective date and opting in with a January 1, 2018 effective date shall be as follows:

**Rates for Qualifying Customers Who Opt Out Effective January 1, 2021  
After Opting Out Effective January 1, 2015 and Opting In Effective January 1, 2018**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	(\$0.000239)	2
3	Rate LLF	(\$0.000239)	3
4	Rate HLF <sup>1/</sup>	(\$0.000239)	4
5	Customer L <sup>2/</sup>	(\$0.000239)	5
6	Customer O - Firm	(\$0.000239)	6
7	Customer O - Interruptible	(\$0.000239)	7
8	Rate WP	(\$0.000239)	8
9	Rate SL	(\$0.000239)	9
10	Rate MHLS	(\$0.000239)	10
11	Rates MOLS and UOLS <sup>3/</sup>	(\$0.000239)	11
12	Rates TS, FS and MS <sup>4/</sup>	(\$0.000239)	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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1000 East Main Street  
Plainfield, Indiana 46168

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**STANDARD CONTRACT RIDER NO. 66 -  
ENERGY EFFICIENCY ADJUSTMENT**

The Energy Efficiency Adjustment factor applicable to Qualifying Customers new to the system who have executed a demand contract of greater than 1 MW and have opted out under the terms of this tariff shall be as follows:

**Rates for Participating Customers**

<u>Line No.</u>	<u>Rate Groups</u>	Proposed Energy Efficiency Factors <u>kWh</u> (A)	<u>Line No.</u>
1	Rate RS	\$0.000000	1
2	Rates CS and FOC	\$0.000000	2
3	Rate LLF	\$0.000000	3
4	Rate HLF <sup>1/</sup>	\$0.000000	4
5	Customer L <sup>2/</sup>	\$0.000000	5
6	Customer O - Firm	\$0.000000	6
7	Customer O - Interruptible	\$0.000000	7
8	Rate WP	\$0.000000	8
9	Rate SL	\$0.000000	9
10	Rate MHLS	\$0.000000	10
11	Rates MOLS and UOLS <sup>3/</sup>	\$0.000000	11
12	Rates TS, FS and MS <sup>4/</sup>	\$0.000000	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**STANDARD CONTRACT RIDER NO. 66 -  
ENERGY EFFICIENCY ADJUSTMENT**

BILLING CYCLE kWh SALES FOR THE COMPANY'S  
RETAIL CUSTOMERS BY RATE SCHEDULE FOR  
THE TWELVE MONTHS ENDED DECEMBER 31, 2019

<u>Line No.</u>	<u>Rate Groups</u>	<u>Billing Cycle kWh Sales (A)</u>	<u>Line No.</u>
1	Rate RS	9,245,570,727	1
2	Rates CS and FOC	1,058,202,805	2
3	Rate LLF	5,306,393,620	3
4	Rate HLF <sup>1/</sup>	10,420,799,481	4
5	Customer L <sup>2/</sup>	154,239,749	5
6	Customer O	1,125,881,284	6
7	Rate WP	152,848,447	7
8	Rate SL	37,680,356	8
9	Rate MHLS	4,525,129	9
10	Rates MOLS and UOLS <sup>3/</sup>	105,527,059	10
11	Rates TS, FS and MS <sup>4/</sup>	9,673,373	11
12	Total Retail	<u>27,621,342,030</u>	12

<sup>1/</sup> Includes Customer C TOU.

<sup>2/</sup> Includes Customer L RTP.

<sup>3/</sup> Includes Rate Code XLED.

<sup>4/</sup> Includes Rate Code WHTL.

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**DUKE ENERGY INDIANA, LLC****ESTIMATED ENERGY EFFICIENCY COSTS FOR 2021**

(In Dollars)

Line No.	Description	Residential (A)	Non-Residential (B)	Total (C) (A) + (B)	Line No.
<b>Conservation</b>					
1	2021 Program Costs	\$ 14,263,582	\$ 16,641,935	\$ 30,905,517	1
2	2021 EM&V	516,152	470,024	986,176	2
3	2021 Incentives	991,097	3,092,656	4,083,753	3
4	2021 Subtotal	15,770,831	20,204,615	35,975,446	4
5	Lost Revenues - 2020	781,357	958,003	1,739,360	5
6	Lost Revenues - 2021	3,087,771	1,077,427	4,165,198	6
7	Lost Revenues Subtotal	3,869,128	2,035,430	5,904,558	7
8	Conservation Subtotals	19,639,959	22,240,045	41,880,004	8
<b>Demand Response</b>					
9	2021 Program Costs	2,492,828	1,422,264	3,915,092	9
10	2021 EM&V	180,000	250,000	430,000	10
11	2021 Incentives	756,634	88,754	845,388	11
12	2021 Subtotal	3,429,462	1,761,018	5,190,480	12
13	Lost Revenues - 2020	-	13,026	13,026	13
14	Lost Revenues - 2021	-	14,377	14,377	14
15	Lost Revenues Subtotal	-	27,403	27,403	15
16	Demand Response Subtotals	3,429,462	1,788,421	5,217,883	16
17	Market Potential Study <sup>1/</sup>	134,750	140,250	275,000	17
<b>Total</b>					
18	2021 Program Costs	16,756,410	18,064,199	34,820,609	18
19	2021 EM&V	696,152	720,024	1,416,176	19
20	2021 Incentives	1,747,731	3,181,410	4,929,141	20
21	2021 Subtotal	19,200,293	21,965,633	41,165,926	21
22	Lost Revenues - 2020	781,357	971,029	1,752,386	22
23	Lost Revenues - 2021	3,087,771	1,091,804	4,179,575	23
24	Lost Revenues Subtotal	3,869,128	2,062,833	5,931,961	24
25	Market Potential Study	134,750	140,250	275,000	25
26	<b>Grand Totals</b>	<b>\$ 23,204,171</b>	<b>\$ 24,168,716</b>	<b>\$ 47,372,887</b>	26

<sup>1/</sup> See Workpaper 9.

**DUKE ENERGY INDIANA, LLC****ACTUAL ENERGY EFFICIENCY COSTS FOR 2019**

(In Dollars)

Line No.	Description	Residential (A)	Non-Residential (B)	Total (C) (A) + (B)	Line No.
	Conservation				
1	Program Costs	\$ 14,686,593	\$ 12,920,886	\$ 27,607,479	1
2	EM&V	205,743	37,645	243,388	2
3	Incentives	2,834,405	4,289,889	7,124,294	3
4	2019 Subtotal	17,726,741	17,248,420	34,975,161	4
5	Lost Revenues - 2012	1,075,653	598,595	1,674,248	5
6	Lost Revenues - 2013	939,311	2,340,319	3,279,630	6
7	Lost Revenues - Jan - Mar 2014	111,602	1,036,708	1,148,310	7
8	Lost Revenues - Apr - Dec 2014	1,330,526	935,565	2,266,091	8
9	Lost Revenues - 2015	1,576,673	1,073,858	2,650,531	9
10	Lost Revenues - 2016	1,395,425	2,012,573	3,407,998	10
11	Lost Revenues - 2017	1,515,182	3,229,276	4,744,458	11
12	Lost Revenues - 2018	1,773,439	2,695,009	4,468,448	12
13	Lost Revenues - 2019	3,544,998	1,065,554	4,610,552	13
14	Lost Revenues Subtotal	13,262,809	14,987,457	28,250,266	14
15	Conservation Subtotals	30,989,550	32,235,877	63,225,427	15
	Demand Response				
16	Program Costs	2,172,559	1,143,413	3,315,972	16
17	EM&V	19,890	53,000	72,890	17
18	Incentives	509,088	29,847	538,935	18
	2019 Subtotal	2,701,537	1,226,260	3,927,797	
19	Lost Revenues - 2017	-	9,902	9,902	19
20	Lost Revenues - 2018	-	35,445	35,445	20
21	Lost Revenues - 2019	-	29,156	29,156	21
22	Lost Revenues Subtotal	-	74,503	74,503	22
23	Demand Response Subtotals	2,701,537	1,300,763	4,002,300	23
24	Market Potential Study	5,280	-	5,280	24
	Total				
25	Program Costs	16,859,152	14,064,299	30,923,451	25
26	EM&V	225,633	90,645	316,278	26
27	Incentives	3,343,493	4,319,736	7,663,229	27
28	2019 Subtotal	20,428,278	18,474,680	38,902,958	28
29	Lost Revenues - 2012	1,075,653	598,595	1,674,248	29
30	Lost Revenues - 2013	939,311	2,340,319	3,279,630	30
31	Lost Revenues - Jan - Mar 2014	111,602	1,036,708	1,148,310	31
32	Lost Revenues - Apr - Dec 2014	1,330,526	935,565	2,266,091	32
33	Lost Revenues - 2015	1,576,673	1,073,858	2,650,531	33
34	Lost Revenues - 2016	1,395,425	2,012,573	3,407,998	34
35	Lost Revenues - 2017	1,515,182	3,239,178	4,754,360	35
36	Lost Revenues - 2018	1,773,439	2,730,454	4,503,893	36
37	Lost Revenues - 2019	3,544,998	1,094,710	4,639,708	37
38	Lost Revenues Subtotal	13,262,809	15,061,960	28,324,769	38
39	Market Potential Study	5,280	-	5,280	39
40	<b>Grand Totals</b>	<b>\$ 33,696,367</b>	<b>\$ 33,536,640</b>	<b>\$ 67,233,007</b>	40

## DUKE ENERGY INDIANA, LLC

### RECONCILIATION OF 2019 RESIDENTIAL RIDER 66 REVENUES TO 2019 ACTUAL REVENUE REQUIREMENT (In Dollars)

		2019 Actual Revenue Requirement				(Over) or Under Collection of 2019 Revenue Requirement	Line
Line No.		Costs	Conversion Factor <sup>1/</sup>	Revenue Requirement	2019 Revenues <sup>4/</sup>	(E) (C)-(D)	No.
		(A)	(B)	(C)	(D)		
	Residential						
1	EE Cost Excluding Lost Revenues <sup>2/</sup>	\$20,428,278	1.02096	\$20,856,455			1
2	Lost Revenues <sup>2/</sup>	13,262,809	1.00000	13,262,809			2
3	Market Potential Study <sup>2/</sup>	5,280	1.02096	5,391			3
4	2014 Reconciliation True-up <sup>3/</sup>	679	1.00000	679			4
5	2015 Reconciliation True-up <sup>3/</sup>	28,914	1.00000	28,914			5
6	2016 Reconciliation True-up <sup>3/</sup>	64,177	1.00000	64,177			6
7	2017 Reconciliation to Actual <sup>3/</sup>	363,258	1.00000	363,258			7
8	Total 2019	<u>\$34,153,395</u>		<u>\$34,581,683</u>	\$42,132,285	<u>(\$7,550,602)</u>	8
9	Removal of Utility Receipts Tax (URT) <sup>5/</sup>					\$105,708	9
10	Revenue Requirement excluding URT <sup>6/</sup>					<u>(\$7,444,894)</u>	10

<sup>1/</sup> Reflects gross-up for revenue related taxes and expenses on EE costs excluding lost revenue.

Lost revenues and reconciliation true-ups do not require a conversion to cover revenue related taxes and expenses since these costs are already built into the lost revenue prices and true-up calculations, respectively.

Components of Revenue Conversion Factor:

	Statutory Rate	Effective Rate	URT Factor
Utility Receipts Tax	1.400%	1.400%	1.0142
Uncollectible Accounts Expense	0.450%	0.450%	
Public Utility Fee	0.120%	0.120%	
State Income Tax	5.625%	0.083%	1a/, 1b/
Federal Income Tax	21.000%	0.000%	
Subtotal		2.053%	
Effective Rate		2.053%	
Complement (1-Effective Rate)		<u>97.947%</u>	
Revenue Conversion Factor			
1 ÷ Complement		<u>1.02096</u>	

<sup>1a/</sup> Indiana House Bill 1004 was enacted in 2011. Among other things, this Bill reduces Indiana's corporate income tax rate by 0.5% annually each July 1st from 2012-2015. The Indiana corporate income tax rate will ultimately be reduced from 8.5% prior to July 1, 2012 to 6.5% as of July 1, 2015. Further rate reductions will continue until 2022. Two state income tax rates were applicable to the 2019 billing period of this tracker (5.75% and 5.50%); therefore, they were averaged.

<sup>1b/</sup> Effective tax rate for debt for state income tax reflects tax on utility receipts tax portion of revenues.

<sup>2/</sup> See Exhibit 2-B, Page 2.

<sup>3/</sup> See Workpaper 7 for details.

<sup>4/</sup> See Workpaper 4.

<sup>5/</sup> Amount for URT will be included on customer bills as separate line item.

<sup>6/</sup> Calculation = Total (Over)/Under Revenue Requirement / URT Factor)



DUKE ENERGY INDIANA, LLC

RECONCILIATION OF 2019 NON-RESIDENTIAL RIDER 66 REVENUES TO 2019 ACTUAL REVENUE REQUIREMENT

		2019 Actual Revenue Requirement			2019 Actual Revenue Requirement <sup>1/</sup>																	
					Customers Opting Out										Customers Opting In							
Line No.	Description	Costs	Conversion Factor <sup>2/</sup>	Revenue Requirements	Participating Customers	Effective 4/1/14	Effective 1/1/15	Effective 1/1/16	Effective 1/1/17	Effective 1/1/18	Effective 1/1/19	Effective 1/1/20	Out 4/1/14, In 1/1/17, Out 1/1/20	Out 1/1/15, In 1/1/20	Out 4/1/14 In 1/1/16	Out 4/1/14 In 1/1/17	Out 1/1/15 In 1/1/17	Out 1/1/15 In 1/1/18	Out 1/1/15 In 1/1/19	Line No.		
Actual Non-Residential 2019 Costs		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)			
1	2019 Program Costs, EM&V and Incentives <sup>3/</sup>	\$18,474,680	1.02096	\$18,861,909	\$18,047,829	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$521,720	\$16,787	\$44,514	\$35,649	\$ 120,528	\$ 55,454	\$ 11,317	\$ 8,111	1		
2	2019 Lost Revenues <sup>3/</sup>	1,094,710	1.02096	1,117,655	1,069,417	-	-	-	-	-	-	30,914	995	2,638	2,112	7,142	3,286	670	481	2		
3	2018 Lost Revenues <sup>3/</sup>	2,730,454	1.00000	2,730,454	2,490,502	-	-	-	-	-	128,741	72,002	2,321	6,144	4,915	16,628	7,645	1,556	-	3		
4	2017 Lost Revenues <sup>3/</sup>	3,239,178	1.00000	3,239,178	2,786,697	-	-	-	-	185,735	144,079	80,558	2,591	6,867	5,507	18,593	8,551	-	-	4		
5	2016 Lost Revenues <sup>3/</sup>	2,012,573	1.00000	2,012,573	1,736,690	-	-	-	16,724	115,743	89,781	50,194	-	-	3,441	-	-	-	-	5		
6	2015 Lost Revenues <sup>3/</sup>	1,073,858	1.00000	1,073,858	899,957	-	-	32,710	8,666	59,986	46,530	26,009	-	-	-	-	-	-	-	6		
7	2012 Through Mar. 2014 Persisting Lost Revenues <sup>3/</sup>	3,975,622	1.00000	3,975,622	1,874,943	1,522,265	185,781	68,142	18,049	124,954	96,926	54,188	1,749	4,612	3,697	12,523	5,765	1,193	835	7		
8	Apr. - Dec. 2014 Persisting Lost Revenues <sup>3/</sup>	935,565	1.00000	935,565	720,273	-	71,365	26,177	6,933	48,004	37,235	20,816	-	1,778	-	-	2,217	449	318	8		
9	Market Potential Study <sup>3/</sup>	-	1.02096	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9		
10	2015 Reconciliation True-up - Incentives <sup>4/</sup>	(1,939)	1.00000	(1,939)	(1,625)	-	-	(59)	(16)	(108)	(84)	(47)	-	-	-	-	-	-	-	10		
11	2015 Reconciliation True-up - Lost Revenues <sup>4/</sup>	95,029	1.00000	95,029	79,640	-	-	2,894	767	5,308	4,118	2,302	-	-	-	-	-	-	-	11		
12	2016 Reconciliation True-up <sup>4/</sup>	337,070	1.00000	337,070	290,864	-	-	-	2,801	19,385	15,037	8,407	-	-	576	-	-	-	-	12		
13	2017 Reconciliation to Actual <sup>4/</sup>	19,365,594	1.00000	19,365,594	15,537,062	274,128	568,334	74,491	6,586	1,183,922	803,204	449,116	27,752	88,797	37,084	199,483	110,796	2,287	2,552	13		
14	2014, 2015 & 2016 Opt Out Group Adjustment <sup>4/</sup>	-	1.00000	-	(22,849)	6,541	27,657	4,958	20,208	(262)	(1,181)	(660)	(2,502)	(6,214)	(361)	(17,986)	(7,753)	280	124	14		
15	Total 2019	\$53,332,394		\$53,742,568	\$45,509,400	\$1,802,934	\$853,137	\$209,313	\$80,718	\$1,742,667	\$1,364,386	\$1,315,519	\$49,693	\$149,136	\$92,620	\$356,911	\$185,961	\$17,752	\$ 12,421	15		
16	Total Revenues Collected in 2019 <sup>5/</sup>			51,007,419	43,200,900	1,763,674	735,888	205,052	80,404	1,672,336	1,374,450	1,168,577	44,096	140,939	96,698	316,925	175,859	19,669	11,952	16		
17	Reconciliation Amount (Over) or Under Collected			\$2,735,149	\$2,308,500	\$39,260	\$117,249	\$4,261	\$314	\$70,331	(\$10,064)	\$146,942	\$5,597	\$8,197	(\$4,078)	\$39,986	\$10,102	(\$1,917)	\$469	17		
18	Removal of Opt Out Groups 2019 Reconciliation Balance <sup>6/</sup>			(\$156,509)		(\$39,260)	(\$117,249)	-	-	-	-	-	-	-						18		
19	Removal of Utility Receipts Tax (URT) <sup>7/, 8/</sup>			(\$36,101)	(\$32,319)	\$0	\$0	(\$60)	(\$4)	(\$985)	\$141	(\$2,057)	(\$78)	(\$115)	\$57	(\$560)	(\$141)	\$27	(\$7)	19		
20	Revenue Requirement excluding Opt Out Groups Adjustment and URT			\$2,542,539	\$2,276,181	\$0	\$0	\$4,201	\$310	\$69,346	(\$9,923)	\$144,885	\$5,519	\$8,082	(\$4,021)	\$39,426	\$9,961	(\$1,890)	\$462	20		

<sup>1/</sup> 2019 KWH Used for Allocation of Non-Residential Costs. See Page 5 for %'s used.

<sup>2/</sup> See Exhibit 2-B, Page 3 for Conversion Factor support.

<sup>3/</sup> See Exhibit 2-B, Page 2.

<sup>4/</sup> See Workpaper 8, pages 1 & 2.

<sup>5/</sup> See Workpaper 2.

<sup>6/</sup> Removed per testimony of Ms. Douglas in Cause No. 45253.

<sup>7/</sup> Amount for URT will be included on customer bills as separate line item.

<sup>8/</sup> Calculation = Reconciliation Amount (Over) or Under / URT Factor)

[illegible][illegible]

## DUKE ENERGY INDIANA, LLC

### RECONCILIATION OF PRIOR YEARS' LOST REVENUE AMOUNTS TO AMOUNTS INCLUDED IN PREVIOUSLY FILED RECONCILIATION (In Dollars)

Line No.		<u>Revised Lost Revenues</u>		<u>Lost Revenues from DSM-7 Filing</u>		Revenue Requirement to be Collected (or Refunded) Adjusted for URT <sup>4/</sup>	Revenue Requirement to be Collected (or Refunded)	Line No.
		Costs (A)	Revenue Requirements <sup>1/</sup> (B)	Costs (C)	Revenue Requirements <sup>1/</sup> (D)	(E) (B)-(D)	(F)	
	<i>Residential:</i>							
1	2015 Residential Lost Revenues <sup>2/</sup>	\$13,097,016	\$13,097,016	\$13,094,701	\$13,094,701	\$2,315	\$2,283	1
2	2016 Residential Lost Revenues <sup>2/</sup>	14,655,536	14,655,536	14,619,560	14,619,560	35,976	\$35,472	2
3	2017 Residential Lost Revenues <sup>2/</sup>	16,332,163	16,332,163	16,181,303	16,181,303	150,860	\$148,748	3
4	2018 Residential Lost Revenues <sup>2/, 3/</sup>	14,057,456	14,057,456	13,490,932	13,490,932	566,524	\$558,593	4
5	<i>Total Residential</i>	<u>\$58,142,171</u>	<u>\$58,142,171</u>	<u>\$57,386,496</u>	<u>\$57,386,496</u>	<u>\$755,675</u>	<u>\$745,096</u>	5
	<i>Non-Residential:</i>							
6	2018 Non-Residential Lost Revenues <sup>3/</sup>	\$12,706,638	\$12,706,638	\$12,698,176	\$12,698,176	\$8,462	\$8,344	6
7	<i>Total Non-Residential</i>	<u>\$12,706,638</u>	<u>\$12,706,638</u>	<u>\$12,698,176</u>	<u>\$12,698,176</u>	<u>\$8,462</u>	<u>\$8,344</u>	7
8	Total Lost Revenues Prior Years' True-Up	<u>\$70,848,809</u>	<u>\$70,848,809</u>	<u>\$70,084,672</u>	<u>\$70,084,672</u>	<u>\$764,137</u>	<u>\$753,439</u>	8

<sup>1/</sup> Lost Revenues do not require a conversion to cover revenue related taxes and expenses since these costs are already built into the lost revenue prices.

<sup>2/</sup> Lost Revenue amounts were revised for retrospective application of additional EM&V results.

<sup>3/</sup> Lost Revenue amounts were updated for corrected lost revenue rates.

<sup>4/</sup> Calculation = Revenue Requirement to be Collected/(Refunded)/ URT Factor) 1.0142



## DUKE ENERGY INDIANA, LLC

### DETERMINATION OF THE 2021 ENERGY EFFICIENCY ADJUSTMENT FACTORS FOR THE RESIDENTIAL RATE GROUP

Line No.	Description	Costs (A)	Conversion Factor <sup>1/</sup> (B)	Revenue Requirements (C) (A) * (B)	Line No.
<b>Residential</b>					
1	2021 Program Costs, EM&V, and Incentives <sup>2/</sup>	\$19,200,293	1.00484	\$19,293,222	1
2	Lost Revenues <sup>2/, 3/</sup>	3,869,128	1.00000	3,869,128	2
3	Market Potential Study <sup>2/</sup>	134,750	1.00484	135,402	3
4	2015 Reconciliation True-up <sup>4/</sup>	2,283	1.00000	2,283	4
5	2016 Reconciliation True-up <sup>4/</sup>	35,472	1.00000	35,472	5
6	2017 Reconciliation True-up <sup>4/</sup>	148,748	1.00000	148,748	6
7	2018 Reconciliation True-up <sup>4/</sup>	558,593	1.00000	558,593	7
8	2019 Reconciliation to Actual <sup>5/</sup>	<u>(7,444,894)</u>	1.00000	<u>(7,444,894)</u>	8
9	Total	\$16,504,373		\$16,597,955	9
10	Billing Determinants (KWH Sales) <sup>6/</sup>			9,245,570,727	10
11	Adjustment Factor per KWH			<u>\$ 0.001795</u>	11

<sup>1/</sup> Reflects gross-up for revenue-related taxes and expenses on EE costs excluding lost revenue.

Lost revenues and reconciliation true-ups do not require a conversion to cover revenue related taxes and expenses since these costs are already built into the lost revenue prices and true-up calculations, respectively.

Components of Revenue Conversion Factor:

	Statutory Rate	Effective Rate
Utility Receipts Tax	1.400%	1.400%
Uncollectible Accounts Expense	0.280%	0.280%
Public Utility Fee	0.127%	0.127%
State Income Tax	5.075%	0.075%
Federal Income Tax	21.000%	0.000%
Subtotal		1.882%
Remove Utility Receipts Tax	1.400%	1.400%
Effective Rate		0.482%
Complement		99.518%
Revenue Conversion Factor		
1 ÷ Complement		<u>1.00484</u>

<sup>1a/</sup> Indiana House Bill 1004 was enacted in 2011. Among other things, this Bill reduces Indiana's corporate income tax rate by 0.5% annually each July 1st from 2012-2015. The Indiana corporate income tax rate will ultimately be reduced from 8.5% prior to July 1, 2012 to 6.5% as of July 1, 2015. Further rate reductions will continue until 2022. Two state income tax rates are applicable to the 2021 billing period of this tracker (5.25% and 4.90%); therefore, they were averaged.

<sup>1b/</sup> Effective tax rate for debt for state income tax reflects tax on utility receipts tax portion of revenues.

<sup>2/</sup> See Exhibit 2-B Page 1.

<sup>3/</sup> Lost revenues estimate includes lost revenues persisting in 2021 for 2020 (calculated as a half year of participation) as well as impacts from lost revenues forecasted to be incurred in 2021 from 2021 program participation.

<sup>4/</sup> See Exhibit 2-B Page 6.

<sup>5/</sup> See Exhibit 2-B Page 3.

<sup>6/</sup> 2019 billed KWH RS; see Workpaper 1.

<sup>7/</sup> See Workpaper 5.

DUKE ENERGY INDIANA, LLC

DETERMINATION OF THE 2021 ENERGY EFFICIENCY ADJUSTMENT FACTORS FOR THE NON-RESIDENTIAL RATE GROUPS

		Total				Allocated Revenue Requirements by Customer Groups															
						Customers Opting Out										Customers Opting In					
Line No.	Description	Costs	Conversion Factor <sup>1/</sup>	Revenue Requirements	Participating Customers	Effective 4/1/14	Effective 1/1/15	Effective 1/1/16	Effective 1/1/17	Effective 1/1/18	Effective 1/1/19	Effective 1/1/20	Out 4/1/14, In 1/1/17, Out 1/1/20	Out 1/1/15, In 1/1/17, Out 1/1/20	Out 4/1/14 In 1/1/16	Out 4/1/14 In 1/1/17	Out 1/1/15 In 1/1/17	Out 1/1/15 In 1/1/18	Out 1/1/15 In 1/1/19	Line No.	
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)		
Non-Residential																					
1	2021 Program Costs, EM&V, and Incentives <sup>2/</sup>	21,965,633	1.00484	\$22,071,947	\$21,793,178	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 43,040	\$ 145,454	\$ 66,878	\$ 13,685	\$ 9,712	1	
2	2021 Lost Revenues <sup>2/</sup>	1,091,804	1.00000	1,091,804	1,078,015	-	-	-	-	-	-	-	-	-	2,129	7,195	3,308	677	480	2	
3	2020 Persisting Lost Revenues <sup>2/</sup>	971,029	1.00000	971,029	958,765	-	-	-	-	-	-	-	-	-	1,894	6,399	2,942	602	427	3	
4	Market Potential Study <sup>2/</sup>	140,250	1.00484	140,929	139,149	-	-	-	-	-	-	-	-	-	275	929	427	87	62	4	
5	2018 Reconciliation True-up <sup>3/</sup>	8,344	1.00000	8,344	7,611	-	-	-	-	-	393	220	7	19	15	51	23	5	-	5	
6	2019 Reconciliation to Actual <sup>4/, 6/</sup>	2,542,539	1.00000	2,542,539	2,276,181	-	-	4,201	310	69,346	(9,923)	144,885	5,519	8,082	(4,021)	39,426	9,961	(1,890)	462	6	
7	2014, 2017 & 2018 Opt Out Group Adjustment <sup>5/, 6/</sup>	(25,252)	1.00000	(25,252)	(104,472)	-	-	9,262	2,453	17,345	57,711	(3,020)	(333)	(257)	(712)	(2,401)	(321)	(71)	(436)	7	
8	Total	26,694,347		\$26,801,340	\$26,148,427	\$0	\$0	\$13,463	\$2,763	\$86,691	\$48,181	\$142,085	\$5,193	\$7,844	\$42,620	\$197,053	\$83,218	\$13,095	\$10,707	8	
9	Billing Determinants (KWH Sales) <sup>7/</sup>			18,375,771,303	8,666,244,706	7,036,098,799	858,619,635	315,015,591	83,406,544	577,591,036	448,020,575	250,498,805	8,045,245	21,341,520	17,148,045	57,831,699	26,629,152	5,420,868	3,859,083	9	
10	Adjustment Factors per KWH				\$ 0.003017	\$ -	\$ -	\$ 0.000043	\$ 0.000033	\$ 0.000150	\$ 0.000108	\$ 0.000567	\$ 0.000645	\$ 0.000368	\$ 0.002485	\$ 0.003407	\$ 0.003125	\$ 0.002416	\$ 0.002775	10	
11	Participant Rate per KWH for Costs Related to 2021 Programs Only <sup>8/</sup>				\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ 0.002655	11	
12	Rate per KWH for Costs for Customers Opting Out 1/1/2021 <sup>9/</sup>				\$ 0.000362															12	
13	Rate per KWH for Costs for Customers Opting Out 4/1/2014, Opting In 1/1/16, Opting Out 1/1/21														\$ (0.000170)					13	
14	Rate per KWH for Costs for Customers Opting Out 4/1/2014, Opting In 1/1/17, Opting Out 1/1/21															\$ 0.000752				14	
15	Rate per KWH for Costs for Customers Opting Out 1/1/2015, Opting In 1/1/17, Opting Out 1/1/21																\$ 0.000470			15	
16	Rate per KWH for Costs for Customers Opting Out 1/1/2015, Opting In 1/1/18, Opting Out 1/1/21																	\$ (0.000239)		16	
17	Rate per KWH for Costs for Customers Opting Out 4/1/2014				\$ -															17	
18	Adjustment Factor for Any 4/1/14 Opt Out Customers Opting Back in 1/1/21				\$ 0.002655															18	
19	Rate per KWH for 2021 Demand Response Programs <sup>10/</sup>				\$ 0.000207															19	
20	Adjustment Factor for 4/1/14 Opt Out Customer Opting Back in 1/1/21 With Contractual Demand Response Exclusion				\$ 0.002448															20	
21	Rate per KWH for Costs for Customers Opting Out 1/1/2015				\$ -															21	
22	Adjustment Factor for Any 1/1/15 Opt Out Customers Opting Back in 1/1/21				\$ 0.002655															22	
23	Rate per KWH for Costs for Customers Opting Out 1/1/2016				\$ 0.000043															23	
24	Adjustment Factor for Any 1/1/16 Opt Out Customers Opting Back in 1/1/21				\$ 0.002698															24	
25	Rate per KWH for Costs for Customers Opting Out 1/1/2017				\$ 0.000033															25	
26	Adjustment Factor for Any 1/1/17 Opt Out Customers Opting Back in 1/1/21				\$ 0.002688															26	
27	Rate per KWH for Costs for Customers Opting Out 1/1/2018				\$ 0.000150															27	
28	Adjustment Factor for Any 1/1/18 Opt Out Customers Opting Back in 1/1/21				\$ 0.002805															28	
29	Rate per KWH for Costs for Customers Opting Out 1/1/2019				\$ 0.000108															29	
30	Adjustment Factor for Any 1/1/19 Opt Out Customers Opting Back in 1/1/21				\$ 0.002763															30	
31	Rate per KWH for Costs for Customers Opting Out 1/1/2020				\$ 0.000567															31	
32	Adjustment Factor for Any 1/1/20 Opt Out Customers Opting Back in 1/1/21				\$ 0.003222															32	
33	Rate per KWH for Costs for Customers Opting Out 4/1/2014, Opting In 1/1/2017 and Opting Out 1/1/2020				\$ 0.000645															33	
34	Adjustment Factor for Any 4/1/14 Opt Out, 1/1/17 Opt In, 1/1/20 Opt Out Customers Opting Back in 1/1/21				\$ 0.003300															34	
35	Rate per KWH for Costs for Customers Opting Out 1/1/2015, Opting In 1/1/2017 and Opting Out 1/1/2020				\$ 0.000368															35	
36	Adjustment Factor for Any 1/1/15 Opt Out, 1/1/17 Opt In, 1/1/20 Opt Out Customers Opting Back in 1/1/21				\$ 0.003023															36	

<sup>1/</sup> See Exhibit 2-B, Page 8.

<sup>4/</sup> See Exhibit 2-B Page 4.

<sup>7/</sup> See Workpaper 2.

<sup>9/</sup> Calculated by subtracting line 11 from line 10, column D.

<sup>2/</sup> See Exhibit 2-B, Page 1.

<sup>5/</sup> See Exhibit 2-B Page 7.

<sup>8/</sup> Calculated by dividing the total of lines 1, 2 & 4 in column D by line 9.

<sup>10/</sup> See Workpaper 10.

<sup>3/</sup> See Exhibit 2-B Page 6.

<sup>6/</sup> Opt out 2014 & 2015 groups zeroed out per Ms. Douglas' testimony in Cause No. 45253.

[illegible][illegible]

**DUKE ENERGY INDIANA, LLC**

**Comparison of Energy Efficiency Adjustment Factors**

Line No.		Proposed DSM-9 Rates	Approved DSM-7 Rates <sup>1/</sup>	Change (C) (A) - (B)	Line No.
		(A)	(B)		
1	Residential	\$ 0.001795	\$ 0.000887	\$ 0.000908	1
2	Non-Residential Participating Customers	\$ 0.003017	\$ 0.003425	\$ (0.000408)	2
3	Customers Opting Out Effective 4/1/2014	\$ -	\$ 0.000054	\$ (0.000054)	3
4	Customers Opting Out Effective 1/1/2015	\$ -	\$ (0.000040)	\$ 0.000040	4
5	Customers Opting Out Effective 1/1/2016	\$ 0.000043	\$ 0.000385	\$ (0.000342)	5
6	Customers Opting Out Effective 1/1/2017	\$ 0.000033	\$ 0.000593	\$ (0.000560)	6
7	Customers Opting Out Effective 1/1/2018	\$ 0.000150	\$ 0.000194	\$ (0.000044)	7
8	Customers Opting Out Effective 1/1/2019	\$ 0.000108	\$ 0.001225	\$ (0.001117)	8
9	Customers Opting Out Effective 1/1/2020	\$ 0.000567	\$ 0.001225	\$ (0.000658)	9
10	Customers Opting Out Effective 1/1/2021	\$ 0.000362	N/A <sup>2/</sup>		10
11	Customers Opting In Effective 1/1/2016 After Opting Out Effective 4/1/2014	\$ 0.002485	\$ 0.003446	\$ (0.000961)	11
12	Customers Opting In Effective 1/1/2017 After Opting Out Effective 4/1/2014	\$ 0.003407	\$ 0.003156	\$ 0.000251	12
13	Customers Opting In Effective 1/1/2017 After Opting Out Effective 1/1/2015	\$ 0.003125	\$ 0.003285	\$ (0.000160)	13
14	Customers Opting In Effective 1/1/2018 After Opting Out Effective 1/1/2015	\$ 0.002416	\$ 0.003522	\$ (0.001106)	14
15	Customers Opting In Effective 1/1/2019 After Opting Out Effective 1/1/2015	\$ 0.002775	\$ 0.002106	\$ 0.000669	15
16	Customers Opting Out Effective 1/1/2020 After Opting Out Effective 4/1/2014 & After Opting In Effective 1/1/2017	\$ 0.000645	N/A <sup>2/</sup>		16
17	Customers Opting Out Effective 1/1/2020 After Opting Out Effective 1/1/2015 & After Opting In Effective 1/1/2017	\$ 0.000368	N/A <sup>2/</sup>		17
18	Customers Opting In Effective 1/1/2021 After Opting Out Effective 4/1/2014	\$ 0.002655	N/A <sup>2/</sup>		18
19	Customers Opting In Effective 1/1/2021 After Opting Out Effective 1/1/2015	\$ 0.002655	N/A <sup>2/</sup>		19
20	Customers Opting In Effective 1/1/2021 After Opting Out Effective 1/1/2016	\$ 0.002698	N/A <sup>2/</sup>		20
21	Customers Opting In Effective 1/1/2021 After Opting Out Effective 1/1/2017	\$ 0.002688	N/A <sup>2/</sup>		21
22	Customers Opting In Effective 1/1/2021 After Opting Out Effective 1/1/2018	\$ 0.002805	N/A <sup>2/</sup>		22
23	Customers Opting In Effective 1/1/2021 After Opting Out Effective 1/1/2019	\$ 0.002763	N/A <sup>2/</sup>		23
24	Customers Opting In Effective 1/1/2021 After Opting Out Effective 1/1/2020	\$ 0.003222	N/A <sup>2/</sup>		24
25	Customers Opting In Effective 1/1/2021 After Opting Out Effective 4/1/2014 Opting In Effective 1/1/2017 & Opting Out 1/1/2020	\$ 0.003300	N/A <sup>2/</sup>		25
26	Customers Opting In Effective 1/1/2021 After Opting Out Effective 1/1/2015 Opting In Effective 1/1/2017 & Opting Out 1/1/2020	\$ 0.003023	N/A <sup>2/</sup>		26
27	Customers Opting Out Effective 1/1/2021 After Opting Out Effective 4/1/2014 & After Opting In Effective 1/1/2016	\$ (0.000170)	N/A <sup>2/</sup>		27
28	Customers Opting Out Effective 1/1/2021 After Opting Out Effective 4/1/2014 & After Opting In Effective 1/1/2017	\$ 0.000752	N/A <sup>2/</sup>		28
29	Customers Opting Out Effective 1/1/2021 After Opting Out Effective 1/1/2015 & After Opting In Effective 1/1/2017	\$ 0.000470	N/A <sup>2/</sup>		29
30	Customers Opting Out Effective 1/1/2021 After Opting Out Effective 1/1/2015 & After Opting In Effective 1/1/2018	\$ (0.000239)	N/A <sup>2/</sup>		30

<sup>1/</sup> Current rates approved in Cause No. 43955 DSM-7 and updated for compliance with rate order in Cause No. 45253.  
DSM-8 filing is pending before the IURC.

<sup>2/</sup> Rates were not developed in DSM-7 because there were no customers in these categories.



## DUKE ENERGY INDIANA, LLC

### Comparison of the Effect of the Change in the Energy Efficiency (EE) Adjustment (Rider 66) on the Bill of a Typical Residential Customer Using 1,000 KWHs

Line No.	Description	Revenue Adjustment Factor for EE Rider 66	Base Bill for Typical Residential Customer	All Other Riders Excl. Rider 66 as of July 30, 2020 <sup>1/</sup>	Total Bill for Typical Residential Customer Excl. Rider 66	EE Rider 66 Revenue Adjustment for 1,000 KWHs	Total Bill Including EE Rider 66 Adjustment	Increase / (Decrease) in Total bill from Current Factor	% Increase/ (Decrease) in Total bill from Current Factor	Line No.
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
1	Proposed Rider 66 Factor	\$ 0.001795	\$ 130.99	\$ (5.32)	\$ 125.67	\$ 1.80	\$ 127.47	0.91 <sup>2/</sup>	0.72%	1
2	Current Rider 66 Factor <sup>3/</sup>	\$ 0.000887	\$ 130.99	\$ (5.32)	\$ 125.67	\$ 0.89	\$ 126.56	N/A	N/A	2

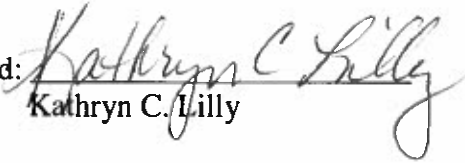
<sup>1/</sup> Excludes Utility Receipts Tax.

<sup>2/</sup> Increase/(decrease) over Current Rider 66 factor.

<sup>3/</sup> Current rates approved in Cause No. 43955 DSM-7 and updated for compliance with rate order in Cause No. 45253.

## 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:   
Kathryn C. Lilly

Dated: 08/19/2020