

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**PETITION OF DUKE ENERGY INDIANA, LLC)
PURSUANT TO IND. CODE §§ 8-1-2-42.7 AND 8-1-2-61,)
FOR (1) AUTHORITY TO MODIFY ITS RATES AND)
CHARGES FOR ELECTRIC UTILITY SERVICE)
THROUGH A STEP-IN OF NEW RATES AND CHARGES)
USING A FORECASTED TEST PERIOD; (2) APPROVAL)
OF NEW SCHEDULES OF RATES AND CHARGES,)
GENERAL RULES AND REGULATIONS, AND RIDERS;)
(3) APPROVAL OF A FEDERAL MANDATE)
CERTIFICATE UNDER IND. CODE § 8-1-8.4-1; (4))
APPROVAL OF REVISED ELECTRIC DEPRECIATION)
RATES APPLICABLE TO ITS ELECTRIC PLANT IN)
SERVICE; (5) APPROVAL OF NECESSARY AND)
APPROPRIATE ACCOUNTING DEFERRAL RELIEF;)
AND (6) APPROVAL OF A REVENUE DECOUPLING)
MECHANISM FOR CERTAIN CUSTOMER CLASSES)**

CAUSE NO. 45253

SUBMISSION OF THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S
CASE-IN-CHIEF

The Indiana Office of Utility Consumer Counselor (“OUCC”) respectfully submits its case-in-chief testimonies and exhibits.

Petitioner’s case-in-chief was prefiled on July 2, 2019 and amended on September 9, 2019. Due to the number of errors, omissions, deficiencies and the lack of transparency in much of its filing as well as Petitioner’s failure to timely provide responses to reasonable and timely data requests, the OUCC expressly reserves its right to supplement and correct subsequently this submission of the OUCC’s case-in-chief testimonies and exhibits as necessary. (**see also** Joint Movants’ Joint Motion to Amend Procedural Schedule, for Appropriate Relief, and for Expedited Briefing and subsequent Reply, which are incorporated herein by reference.)

By submitting its case-in-chief at this time while reserving its right to supplement and correct it subsequently, the OUCC also does not waive, expressly or implicitly, its right to seek

administrative and judicial review on any grounds duly authorized by any applicable state or federal rule, statute, case, constitutional provision, or other legal authority of the docket entry denying the Joint Motion issued on October 28, 2019, in this Cause. The OUCC also expressly reserves the right to rely on its case-in-chief testimonies and exhibits in addition to the above-referenced Joint Motion and Reply in seeking such administrative and judicial review.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'RCH', is written over a horizontal line.

Randall C. Helmen

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Chief Deputy Consumer Counselor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail this 30th day of October to the following:

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