

OFFICIAL
EXHIBITS

FILED
June 2, 2022
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

APPLICATION OF DUKE ENERGY INDIANA, LLC)
FOR APPROVAL OF A CHANGE IN ITS FUEL COST)
ADJUSTMENT FOR ELECTRIC SERVICE AND FOR)
APPROVAL OF A CHANGE IN ITS FUEL COST)
ADJUSTMENT FOR HIGH PRESSURE STEAM)
SERVICE, IN ACCORDANCE WITH INDIANA CODE)
§8-1-2-42, INDIANA CODE §8-1-2-42.3 AND VARIOUS)
ORDERS OF THE INDIANA UTILITY)
REGULATORY COMMISSION)

CAUSE NO. 38707

FAC-132

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PUBLIC'S

EXHIBIT NO.

6-15-22
DATE

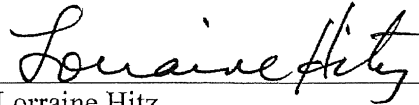
AT
REPORTER

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 2

TESTIMONY OF OUCC WITNESS MICHAEL D. ECKERT

June 2, 2022



Lorraine Hitz

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Deputy Consumer Counselor

TESTIMONY OF OUCC WITNESS MICHAEL D. ECKERT
CAUSE NO. 38707 FAC-132
DUKE ENERGY INDIANA, LLC.

I. INTRODUCTION

1 **Q: Please state your name, business address and employment capacity.**

2 A: My name is Michael D. Eckert, and my business address is 115 W. Washington St.,
3 Suite 1500 South, Indianapolis, Indiana 46204. I am employed by the Indiana Office of
4 Utility Consumer Counselor ("OUCC") as Director of the Electric Division. My
5 qualifications are set forth in Appendix A of this document.

6 **Q: Have you previously testified before the Indiana Utility Regulatory Commission**
7 **("Commission")?**

8 A: Yes.

9 **Q: What is the purpose of your testimony?**

10 A: I address Duke Energy Indiana, LLC's ("DEI"): (1) purchased power over the
11 benchmark; (2) Ancillary Services Market ("ASM") Order; (3) hedging transactions;
12 (4) monthly average regulation, spinning, and supplemental reserves; (5) Benton
13 County Wind Farm ("Benton County"); (6) coal inventory; (7) coal
14 increment/decrement pricing; (8) coal inventory impacts; (9) bill analysis; (10) actual
15 cost of fuel (Mills/kWh) comparison; (11) net operating income analysis; (12)
16 commitment status; and (13) Cause No. 38707 FAC 123 S1 requirements.
17 Ultimately, the OUCC recommends the Commission require DEI to provide the
18 actual and forecasted 2022 projected coal burn; the inputs to its calculation of the
19 coal price increment/decrement; reasons for any use of increment/decrement pricing,

1 and to update the Commission in its next FAC filing on its coal inventory and
2 transportation situation (as further described in my testimony below). The OUCC
3 further recommends the Commission approve the OUCC's revisions to DEI's
4 proposed fuel cost factors as recalculated by OUCC witness Gregory T. Guerrettaz.
5 The revised factor will spread out DEI's large variance over a period of four (4),
6 rather than two (2) quarters.

7 **Q: Please describe the review and analysis you conducted in order to prepare your**
8 **testimony.**

9 A: I read DEI's prefiled testimony and petition in this proceeding as well as relevant
10 Commission Orders. I reviewed DEI's workpapers and responses to the OUCC's
11 data requests, pertinent sections of Title 8 of Indiana Code, and Title 170 of the
12 Indiana Administrative Code. Additionally, the OUCC performed its field audit
13 remotely via conference call and Microsoft Teams on Thursday, May 19, 2022 and
14 Friday May 20, 2022. I also participated in meetings with other OUCC staff members
15 and DEI personnel in developing issues identified in this Cause.

16 **Q: How many days does the OUCC have to review DEI's FAC request?**

17 A: Indiana Code § 8-1-2-42(b) grants the OUCC twenty (20) days to review an FAC
18 request once it is filed. However, pursuant to an agreement between DEI and the
19 OUCC, the OUCC has thirty-five (35) days to complete its review and file its
20 testimony.

II. ANCILLARY SERVICES MARKET

21 **Q: Does DEI's treatment of ASM charges follow the treatment ordered by the**
22 **Commission in its Phase II Order in Cause No. 43426, dated June 30, 2009?**

1 A: Yes.

III. HEDGING TRANSACTIONS

2 **Q: Do you have any concerns related to hedging transactions in this FAC?**

3 A: Yes. DEI incurred a large hedging loss of \$35,733,067. Mr. Guerrettaz's testimony
4 provides more information and analysis on the hedging transactions.

5 **Q: How were DEI's hedging programs impacted by the coal supply issues?**

6 A: DEI hedged more purchased power and natural gas than before in December 2021,
7 January 2022, and February 2022 because DEI's coal units were not dispatched as
8 frequently. DEI's coal units were deliberately priced higher going into the MISO
9 market because DEI implemented a coal "adder" (or increment) to the unit price. The
10 increment was added because DEI's coal inventories were below target levels due to
11 rail and labor constraints. In addition, due to significantly warmer-than-normal
12 weather in December 2022, there was a decreased demand for generation, resulting
13 in a hedging loss of \$35,733,067.

14 **Q: Have you reviewed the purchased power and natural gas hedges since**
15 **December 2013?**

16 A: Yes. I have attached the purchased power and natural gas hedging gains/losses, by
17 month for the period December 2013 through February 2022 as Attachment MDE-
18 3. The data shows that in general, hedging gains and losses for the period December
19 2013 through January 2021 were relatively consistent. Beginning in February 2021,
20 DEI experienced its largest hedging gain of \$17,524,071, and with the exception of
21 March 2021, continued to experience large gains through November 2021. Then in

1 December 2021, DEI experienced its largest hedging loss ever, followed by its 2nd
2 and 3rd largest hedging losses in January 2022 and February 2022.

3 **Q: What started to occur during 2021?**

4 A: DEI began experiencing coal supply and coal transportation issues, while natural gas
5 and power prices were increasing significantly.

6 **Q: Has DEI performed or initiated a formal review of its hedging policy since**
7 **February 2021?**

8 A: No. DEI did not perform a formal review to determine if its current hedging policy
9 is appropriate during a time when power and natural gas prices are high while
10 simultaneously there are coal supply issues. However, DEI indicates it is performing
11 an informal review.

12 **Q: Has the OUCC asked DEI to provide the results of its informal review?**

13 A: Yes. The OUCC asked DEI to update the OUCC and Commission on the findings of
14 this internal review and recommends DEI file testimony on the results of this
15 informal review in its next FAC.

IV. REGULATION, SPINNING, AND SUPPLEMENTAL RESERVES CHARGES

16 **Q: Did DEI report the monthly average ASM cost distribution amounts for**
17 **regulation, spinning, and supplemental reserves it paid for each of the ancillary**
18 **service products?**

19 A: Yes. Per the Commission's Order,¹ DEI reported² the average monthly ASM cost
20 distribution amounts for regulation, spinning, and supplemental reserves charge
21 types.

¹ See the Commission's Order in Cause No. 43426, Phase II, p. 41.

² See DEI Witness Scott Burnside's testimony, p. 7.

V. BENTON COUNTY WIND FARM

1 **Q: Were there any new developments related to the Benton County Wind Farm?**

2 A: No.

VI. COAL INVENTORY

3 **Q: How has DEI's coal inventory changed since its last FAC petition?**

4 A: DEI witness Brett Phipps testified that since November 30, 2021, DEI's coal
5 inventory at its generating stations has increased from approximately 1,472,934 tons
6 (27 days) to 1,561,002 tons (30 days) as of February 28, 2022. DEI's is actively
7 trying to maintain a minimum inventory through the next FAC period.³

8 **Q: Why is DEI struggling to maintain its coal supply inventory at target levels?**

9 A: DEI's coal inventory is below target levels because DEI has experienced coal supply
10 and transportation issues over the last nine months. In addition, projected coal burns
11 for calendar year 2021 were significantly lower than the actual coal burn for 2021.
12 This occurred because natural gas prices increased significantly during the summer
13 of 2021, making coal generation more competitive and/or cheaper than natural gas
14 fired generation.

15 **Q: Did DEI explain its coal supply issues?**

16 A: Yes. Mr. Phipps testified "the Company continued to see significant delivery
17 constraints due to labor shortages from COVID-19 and other railroad resource
18 constraints which moved the Company's impacted coal deliveries into the future.
19 The Company remains concerned and continues to monitor the viability of future

³ See DEI Witness Brett Phipps' testimony, p. 12.

1 supply due to the financial and labor constraints facing its suppliers and rail
2 transportation providers.”⁴

3 **Q: Is DEI actively trying to manage its coal purchases and coal inventory?**

4 A: Yes. DEI indicated through its prefiled testimony and discussions with the OUCC
5 that it is actively looking into options to manage its coal inventory. DEI has been
6 able to secure additional coal for 2022-2023, but is still struggling to acquire and
7 maintain adequate transportation to get the coal to its stations.

8 **Q: Is DEI in contact with its coal transportation providers in an attempt to increase**
9 **transportation (number of trains)?**

10 A: Yes.

11 **Q: Has DEI filed a complaint with the Service Transportation Board?**

12 A: No.

13 **Q: Has DEI tried to enforce any non-compliance options in its rail contracts?**

14 A: No.

15 **Q: Does DEI have any coal at its interim coal storage sites or Gallagher Station?**

16 A: Yes. DEI has a total of 166,546⁵ tons of coal at one interim coal storage site as of
17 February 28, 2022. As of January 31, 2022, the coal pile at Gallagher Units 2 and 4
18 had no remaining tons.⁶

19 **Q: How have DEI's coal inventory levels changed since January 2019?**

20 A: The following table depicts DEI's coal inventory levels, including interim coal
21 storage sites, since January 2019.

Month/Year	Amount (Tons)	Month/Year	Amount (Tons)
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⁴ See Phipps, p. 10.

⁵ See DEI's Witness Mr. Brett Phipps' testimony, page 13-14.

⁶ See Phipps, p. 11.

January 2019 ⁷	2,287,084	September 2020 ⁷	4,455,434
February 2019 ⁷	2,205,048	October 2020 ⁷	4,331,538
March 2019 ⁷	2,388,139	November 2020 ⁷	4,069,248
April 2019 ⁷	2,501,786	December 2020 ⁷	3,816,974
May 2019 ⁷	2,775,470	January 2021 ⁷	3,324,146
June 2019 ⁷	2,877,755	February 2021 ⁷	2,740,955
July 2019 ⁷	2,931,160	March 2021 ⁷	2,732,008
August 2019 ⁷	3,014,727	April 2021 ⁷	2,736,182
September 2019 ⁷	3,253,250	May 2021 ⁷	2,655,615
October 2019 ⁷	3,573,122	June 2021 ⁷	2,294,261
November 2019 ⁷	3,988,798	July 2021 ⁷	1,324,997
December 2019 ⁷	4,349,934	August 2021 ⁷	970,858
January 2020 ⁷	4,561,990	September 2021 ⁷	1,208,424
February 2020 ⁷	4,878,345	October 2021 ⁷	1,496,386
March 2020 ⁷	4,902,847	November 2021 ⁷	1,665,175
April 2020 ⁷	5,028,141	December 2021 ⁷	1,946,528
May 2020 ⁷	5,127,370	January 2022 ⁷	1,856,258
June 2020 ⁷	5,324,271	February 2022 ⁷	1,727,549
July 2020 ⁷	5,095,264	March 2022 ⁷	1,932,194
August 2020 ⁷	4,708,754	April 2022 ⁷	2,073,592

- 1 **Q: Should DEI continue to update the Commission on its coal inventory?**
2 A: Yes. As ordered by the Commission in Cause No. 38707 FAC-96 and subsequent
3 FAC proceedings, DEI should continue to provide information regarding its coal
4 inventory. DEI should also update the Commission on its 2022 projected coal burn
5 and coal purchases. In addition, DEI should update the Commission on how it is

⁷ Amount including interim off-site storage.

1 addressing its coal transportation issues. The OUCC will continue to review and
2 monitor DEI's projected burns and purchases for reasonableness.

VII. COAL INCREMENT PRICING

3 **Q: Is DEI utilizing coal supply offer adjustment (“increment”) pricing?**

4 A: Yes. DEI continued to implement a supply offer adjustment (“increment”) on a per
5 MWh during this FAC period, which was applied to the Gibson and Cayuga Stations.

6 **Q: What factors are impacting coal inventory and driving the supply offer
7 adjustment?**

8 A: Several factors have impacted coal inventory and coal supply. In the past few years,
9 electric utilities and coal mines have dealt with high coal inventory levels due to low
10 demand and low natural gas prices. Demand was further impacted by the COVID-19
11 pandemic. Thus, coal mines reduced production to better align with demand.

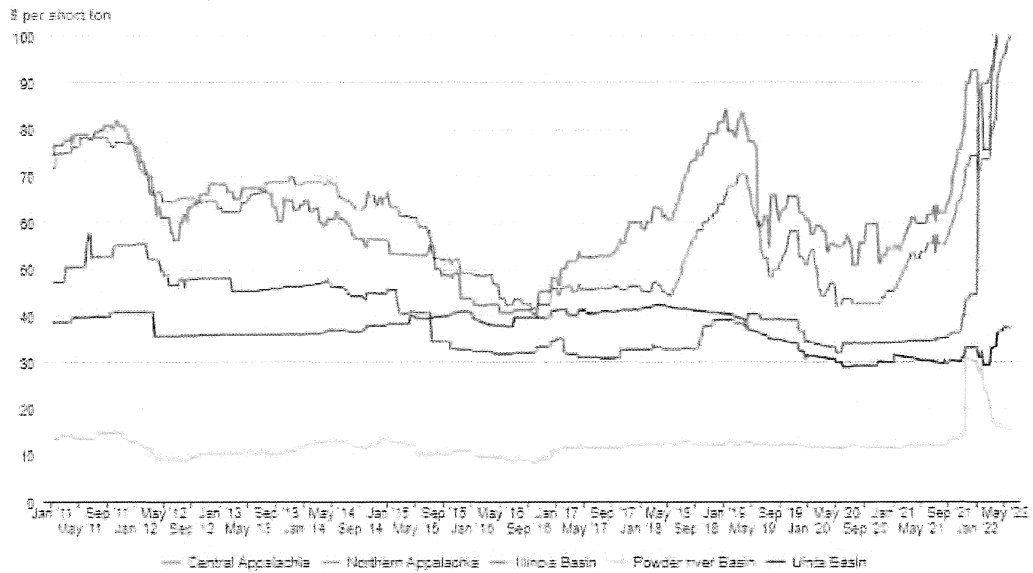
12 **Q: Did coal generation demand increase during the calendar year 2021?**

13 A: Yes. Projected coal burns for calendar year 2021 were significantly lower than the
14 actual coal burn for 2021. This occurred because natural gas prices increased
15 significantly during the summer of 2021, making coal generation more competitive
16 and/or cheaper than natural gas fired generation.

17 **Q: At this same time, did coal prices increase dramatically over the last 9 months?**

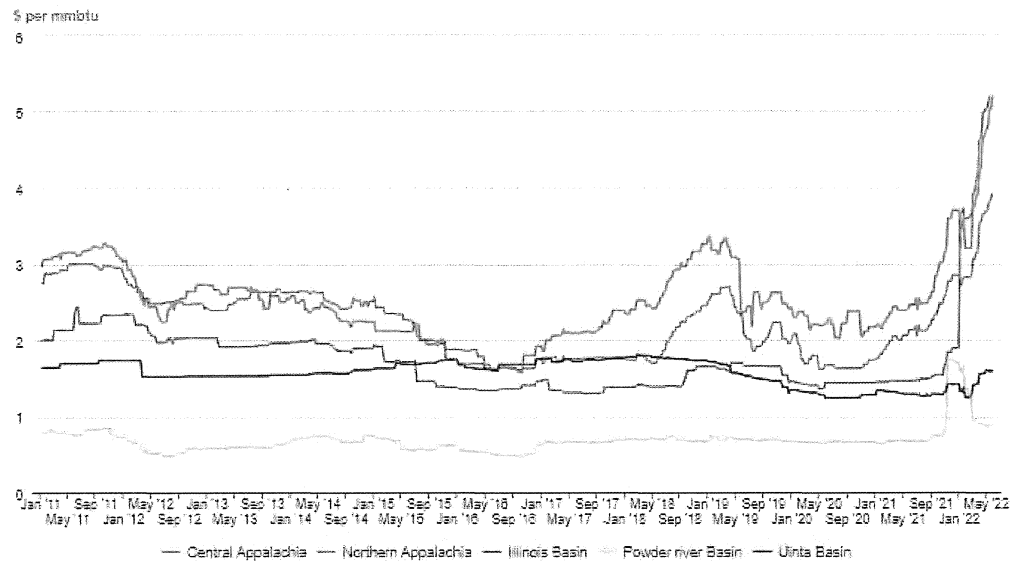
18 A: Yes. I have enclosed two charts from EIA that shows historical coal prices by region,
19 by dollars per short ton, and by dollars per mmbtu.

Historic coal prices by region, 2011 - current data



eia Source: S&P Energy

Historic coal prices by region, 2011 - current data



eia Source: U.S. Energy Information Administration based on S&P Energy

1
2

Q: Were coal mines and railroads able to meet the increased coal demand that the electric utilities needed?

1 A: No. Coal mines that had previously cut back production then had trouble increasing
2 production to meet demand. Railroad transportation providers also had trouble
3 increasing service to meet the increased demand. In addition, coal mines and
4 railroads have experienced labor shortage constraints. As a result, several coal mines
5 have sold all their coal for 2021 and/or 2022.

6 **Q: Does DEI expect a distressed coal supply chain to continue through 2022?**

7 A: Yes. Even though DEI has been able to secure additional coal for 2022-2023, it is
8 still struggling to acquire and maintain adequate transportation to get the coal to its
9 stations. Thus, OUCC witness Guerrettaz has additional recommendations regarding
10 this issue.

11 **Q: As a result of these coal supply chain issues, has DEI altered its Day-Ahead
12 Offer price?**

13 A: Yes. DEI used an increment/adder adjustment to its supply offers to MISO to reduce
14 the dispatch frequency of its coal generation (Gibson and Cayuga). Even though the
15 OUCC does not like the use of a coal increment, the OUCC understands that DEI
16 needed to have a reasonable level of coal inventory for the winter peaking season to
17 meet the reliability concerns in MISO. The increment has the effect of making the
18 offered units more expensive, thus reducing the likelihood that certain units will be
19 "picked up" to run by MISO.

20 **Q: Why did DEI use the increment?**

21 A: DEI used the increment to deal with the fact that it had a lower-than-average coal
22 inventory. By raising the offer price, DEI's incremented units were less likely to be
23 picked up and coal inventory would not be depleted. DEI wanted to maintain the

1 ability to run the units if needed for reliability during periods of high demand.

2 **Q: How does use of the coal increment/decrement impact DEI's customers?**

3 A: If DEI implements the coal decrement and puts its units into the market below cost,
4 DEI then seeks recovery from customers of the entire cost. If DEI implements the
5 coal increment and puts its units into the market above cost, DEI then seeks recovery
6 from customers of the entire cost. Under either scenario, Duke seeks recovery of the
7 actual cost incurred; under a coal increment, DEI's units run less and under a coal
8 decrement, DEI's units run more. DEI requests recovery of the actual cost of running
9 the unit, not the cost at which DEI put the units into the market.

10 **Q: What does the OUCC recommend?**

11 A: The OUCC recommends DEI file testimony, schedules, and workpapers to justify
12 any actual need for, or use of, coal increment/decrement pricing in its next FAC
13 filing.

VIII. COAL INVENTORY IMPACTS

14 **Q: How did DEI's coal inventory issues impact its operations and fuel cost?**

15 A: DEI's coal inventory caused DEI to 1) implement a significant fuel increment
16 (adder); 2) divert coal from Edwardsport to Cayuga; and 3) increase its hedge
17 position resulting in substantial hedging losses which increased the cost of fuel.

18 **Q: Why did DEI implement a fuel increment adder?**

19 A: DEI's projection in the fall of 2021 showed the company running out of coal by the
20 end of the year if DEI did not implement an increment/adder adjustment to its supply
21 offers to MISO to reduce the dispatch frequency of its coal generation at Gibson and

1 Cayuga. The increment has the effect of making the offered units more expensive,
2 thus reducing the likelihood that certain units will be “picked up” to run by MISO.

3 **Q: Why did DEI divert coal from Edwardsport to Cayuga?**

4 A: DEI was trying to ensure its coal inventory at Cayuga remained above 20 days. In
5 addition, DEI has a requirement to run at least one of the Cayuga Units all the time.
6 To meet these goals, DEI diverted coal from Edwardsport to Cayuga for the period
7 December 17, 2021 to March 21, 2022 so it could maintain the Cayuga inventory
8 pile.

9 **Q: How was Edwardsport impacted by diverting coal to Cayuga?**

10 A: During this period, DEI operated Edwardsport on one gasifier and supplemented the
11 station with natural gas. This action cost the company money because Edwardsport
12 is more expensive on natural gas than on syngas.

13 **Q: How were DEI's hedging programs impacted by the coal supply issues?**

14 A: DEI hedged more purchased power and natural gas in December 2021, January 2022,
15 and February 2022 because DEI implemented the coal adder to cause their coal
16 generation to run less. In addition, there was significant warmer-than-normal weather
17 in December 2022, which decreased the demand for generation, resulting in a
18 hedging loss of \$35,733,067, as discussed above.

IX. BILL ANALYSIS

19 **Q: Have you calculated the bill impact on a typical residential customer's bill using**
20 **500, 1,000, 1,500, and 2,000 kWhs at DEI's proposed rate of \$0.034243 and**
21 **compared that to the same typical customer's bill using the currently approved**
22 **rate?**

23 A: Yes, I did, as reflected in the table below.

	<u>Consumption</u>	Dollar <u>Inc/(Dec)</u>	% Increase <u>/(Decrease)</u>
1			
2			
3	500	\$11.30	8.35%
4	1,000	\$22.59	16.00%
5	1,500	\$33.89	23.05%
6	2,000	\$45.20	29.57%

7 **Q: Have you calculated the bill impact on a typical residential customer's bill using**
8 **500, 1,000, 1,500, and 2,000 kWhs at the OUCC's proposed rate of \$0.030699**
9 **and compared that to the same typical customer's bill using the currently**
10 **approved rate?**

11 A: Yes, I did, as reflected in the table below.

	<u>Consumption</u>	Dollar <u>Inc/(Dec)</u>	% Increase <u>/(Decrease)</u>
12			
13			
14	500	\$9.53	7.04%
15	1,000	\$19.05	13.49%
16	1,500	\$28.58	19.44%
17	2,000	\$38.11	24.93%

18 **Q: What assumptions did you make in this calculation?**

19 A: In making this calculation, I did not include any dollar amount for base rates, other
20 trackers, and taxes. Therefore, this calculation reflects only the proposed change to
21 the FAC factor.

22 **Q: Have you provided a calculation of a typical customer's bill using 1,000 kWh in**
23 **June 2022, using DEI's online tariffs as of June 1, 2022?**

24 A: Yes. See Attachment MDE-2. A typical residential customer using 1,000 kWh in
25 June 2022 will pay \$141.20 excluding taxes. This amount consists of \$130.99 in base
26 charges that were set in DEI's last rate case (Cause No. 45253), \$11.65 in fuel
27 adjustment clause charges, and (\$1.44) in non-FAC trackers and riders.

X. ACTUAL COST OF FUEL (MILLS/KWH) COMPARISON

28 **Q: Did you do a comparison of the actual monthly cost of fuel (Mills/kWh) for the**
29 **five large Indiana investor owned utilities ("IOUs")?**

1 A: Yes. I did. DEI's actual cost of fuel is higher than the other IOUs in the State of
2 Indiana (See Attachment MDE-1).

XI. NET OPERATING INCOME ANALYSIS

3 **Q: Have you reviewed DEI's calculation of the authorized net operating income**
4 **amount for earnings test purposes?**

5 A: Yes, I have. DEI calculates its authorized net operating income for earnings test
6 purposes by adding the authorized jurisdictional return on fair value and original cost
7 depreciated rate base to the tracked amounts attributable to its Construction Work in
8 Progress ("CWIP"), Environmental Compliance Rider ("ECR") and Renewable
9 Energy Projects ("REP") projects. The table below reflects DEI's calculation of the
10 authorized net operating income for earnings test purposes.

Proceeding	Earnings Amount	Phase-In Total
45253 Base Rate Case Phase 1 ⁸	\$568,728,000	\$238,411,000
45253 Base Rate Case Phase 2 ⁹	579,310,000	336,463,000
42061 ECR-34 ¹⁰	283,000	116,000
42061 ECR-35 Phase 1 ¹¹	166,000	1,000
42061 ECR-35 Phase 2 ¹²	166,000	75,000
42061 ECR-36 Phase 2 ¹³	83,000	10,000
44932 REP-2 ¹⁴	1,171,000	391,000
44932 REP-3 Phase 1 ¹⁵	1,543,000	131,000
44932 REP-3 Phase 2 ¹⁶	1,543,000	896,000
Total (March 1, 2021 through February 28, 2022)		\$576,494,000
Actual Jurisdictional Earned Return ¹⁷		528,984,000
Over-Earning/ (Under-Earning)		(\$47,510,000)

- 1 **Q: Did DEI over-earn during the 12-month period covered by this Petition?**
- 2 **A:** No. DEI did not over-earn during the 12-month period covered by this Petition.

⁸ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 2 of 4, Column C and D.
⁹ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 3 of 4, Columns C and D.
¹⁰ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 2 of 4, Column E and F.
¹¹ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 2 of 4, Column G and H.
¹² Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 3 of 4, Column E and F.
¹³ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 3 of 4, Column G and H.
¹⁴ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 2 of 4, Columns I and J.
¹⁵ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 2 of 4, Columns K and L.
¹⁶ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 3 of 4, Column I and J.
¹⁷ Cause No. 38707 FAC 132, Exhibit 6-B (SES), page 4 of 4, Column D, Line 20.

XII. UNIT COMMITMENT STATUS

1 **Q: Does the OUCC review DEI's unit commitment status during its FAC audit?**

2 A: Yes. The OUCC generally reviews DEI's unit commitment status and Mr.
3 Guerrettaz's testimony details some of the analysis done by the OUCC during its
4 FAC audit. In general, the OUCC's FAC audit process has focused more on the cost
5 of fuel and the cost of purchased power.

XIII. CAUSE NO. 38707 FAC 123 S1 REQUIREMENT

6 **Q: Did the Commission's Cause No. 38707 FAC 123 S1 Order ("FAC 123 S1**
7 **Order") make any specific findings regarding the FAC process?**

8 A: Yes. The Commission acknowledged "the changing market landscape and the
9 challenges that presents for reasonable unit commitment decisions and their required
10 review. We encourage Duke Energy Indiana to work toward development of a more
11 quantified decision-making process that may aid the OUCC in its statutory summary
12 proceeding review."¹⁸

13 **Q: Did DEI provide the OUCC with the list of additional items it requested in FAC-**
14 **128 as part of the standard audit package?**

15 A: Yes.

XIV. OUCC RECOMMENDATIONS

16 **Q: Please summarize your recommendations to the Commission in this cause.**

17 A: The OUCC recommends the Commission require DEI to provide the following
18 information:

19 1) Update the Commission on DEI's current coal inventory situation and 2022

¹⁸ *In re Duke Energy Indiana, LLC*, Cause No. 38707 FAC 123-S1, Order at 24, (Ind. Util. Regul. Comm'n Mar. 17, 2021).

- 1 projected coal burn and coal purchases;
- 2 2) Update the Commission on the coal transportation issues;
- 3 3) Update the Commission on DEI's coal hedging policy; and
- 4 4) As ordered in Cause No. 38707 FAC-96 and subsequent FAC proceedings,
5 continue to provide the inputs to its calculation of and the reasons for any use of
6 the coal price increment/decrement.

7 The OUCC recommends the Commission approve DEI's proposed fuel cost factors,
8 as recalculated and confirmed by Mr. Guerrettaz spreading the FAC-132 variance
9 over four FAC periods, and subject to further action in this docket.

10 **Q: Does this conclude your testimony?**

11 **A:** Yes, it does.

APPENDIX A – QUALIFICATIONS OF MICHAEL D. ECKERT

1 **Q: Please describe your educational background and experience.**

2 A: I graduated from Purdue University in West Lafayette, Indiana in December 1986,
3 with a Bachelor of Science degree, majoring in Accounting. I am licensed in the State
4 of Indiana as a Certified Public Accountant. Upon graduation, I worked as a Field
5 Auditor with the Audit Bureau of Circulation in Schaumburg, Illinois until October
6 1987. In December 1987, I accepted a position as a Staff Accountant with the OUCC.
7 In May 1995, I was promoted to Principal Accountant and in December 1997, I was
8 promoted to Assistant Chief Accountant. As part of the OUCC's reorganization, I
9 accepted the position of Assistant Director of its Telecommunications Division in
10 July 1999. From January 2000 through May 2000, I was the Acting Director of the
11 Telecommunications Division. During an OUCC reorganization, I accepted a
12 position as a Senior Utility Analyst and in September 2017, I was promoted to
13 Assistant Director of the Electric Division. In February 2022, I was promoted to the
14 Director of the Electric Division. As part of my continuing education, I have attended
15 the National Association of Regulatory Utility Commissioner's ("NARUC") two-
16 week seminar in Lansing, Michigan. I attended NARUC's Spring 1993 and 1996
17 seminar on system of accounts. In addition, I attended several CPA sponsored
18 courses and the Institute of Public Utilities Annual Conference in December 1994
19 and December 2000.

Duke Energy Indiana
Cause No. 38707 FAC-132

Residential Customer Bill using 1,000 kWh

Description:	Rider	kWh	Rate	\$	% of Bill
Customer Charge	Base			\$10.54	7.46%
Energy Charge	Base	300 *	\$0.148799	44.64	31.62%
Energy Charge	Base	700	\$0.108297	75.81	53.69%
Coal Gasification Adj.	61	1,000	\$0.000000	0.00	0.00%
Pollution Control Adj.	62	1,000 *	(\$0.001698)	(1.70)	-1.20%
Emission Allowance Adj.	63	1,000 *	\$0.000000	0.00	0.00%
Transmission and Distribution Infrastructure Improvement	65	1,000	\$0.001552	1.55	1.10%
Energy Efficiency Adj.	66	1,000 *	\$0.001774	1.77	1.25%
Credit Adjustment	67	1,000	(\$0.003659)	(3.66)	-2.59%
Regional Transmission Operator Adj	68	1,000	\$0.000172	0.17	0.12%
Reliability Adj..	70	1,000 *	(\$0.000094)	(0.09)	-0.06%
Clean Coal Adj.	71	1,000 *	\$0.000000	0.00	0.00%
Federal Mandate Rider Adj.	72	1,000 *	\$0.000106	0.11	0.08%
Renewable Energy Rider	73	1,000	\$0.000405	0.41	0.29%
Sub-Total				129.55	91.75%
FAC Charge	60	1,000 **	\$0.011645	11.65	8.25%
Total Billing Amount				\$141.20	100.00%
Base and Energy Charge				\$130.99	92.77%
Other Trackers				(1.44)	-1.02%
FAC				11.65	8.25%
Total				\$141.20	100.00%

* Online tariffs as of June 1, 2022, (<http://www.duke-energy.com/rates/indiana/tariff.asp>)

Duke Energy Indiana
Cause No. 38707 FAC-132

Power and Natural Gas Hedging Gains and Losses

FAC	Month/Year	Power Hedging	Gas Hedging	Total Hedging	FAC	Month/Year	Power Hedging	Gas Hedging	Total Hedging
FAC 100	Dec-13	(\$839,153.00)	\$0.00	(\$839,153.00)	FAC 116	Dec-17	5,769	183	5,952
	Jan-14	(108,989)	-	(108,989)		Jan-18	(33,934)	(242,387)	(276,321)
	Feb-14	(308,100)	-	(308,100)		Feb-18	(77,500)	145,739	68,239
FAC 101	Mar-14	(111,103)	-	(111,103)	FAC 117	Mar-18	3,188	253	3,441
	Apr-14	(49,453)	-	(49,453)		Apr-18	(72,267)	409	(71,858)
	May-14	(528,710)	-	(528,710)	FAC 118	May-18	(740,942)	112	(740,830)
FAC 102	Jun-14	(253,055)	-	(253,055)		Jun-18	(169,656)	(164,636)	(334,292)
	Jul-14	197,851	-	197,851		Jul-18	(35,435)	(257,240)	(292,675)
	Aug-14	363,164	-	363,164	FAC 119	Aug-18	57,469	(394,533)	(337,064)
FAC 103	Sep-14	217,552	-	217,552		Sep-18	(30,448)	126	(30,322)
	Oct-14	17,310	-	17,310		Oct-18	(12,043)	65	(11,978)
	Nov-14	(561,498)	-	(561,498)	FAC 120	Nov-18	32,466	34	32,500
FAC 104	Dec-14	733,946	246	734,192		Dec-18	41,750	176	41,926
	Jan-15	352,388	33	352,421	FAC 121	Jan-19	(155,302)	84,552	(70,750)
	Feb-15	(5,797)	134,680	128,883		Feb-19	25,645	246,216	271,861
FAC 105	Mar-15	364,197	46,345	410,542		Mar-19	31,590	-	31,590
	Apr-15	423,421	-	423,421	FAC 122	Apr-19	201,283	459	201,742
	May-15	337,407	261	337,668		May-19	1,178,491	393	1,178,884
FAC 106	Jun-15	795,375	-	795,375		Jun-19	826,977	160,121	987,098
	Jul-15	187,312	33	187,345		Jul-19	(20,568)	588,397	567,829
	Aug-15	245,336	(68,045)	177,291	FAC 123	Aug-19	354,299	908,478	1,262,777
FAC 107	Sep-15	306,660	9,675	316,335		Sep-19	(155,046)	(315,641)	(470,687)
	Oct-15	122,895	-	122,895		Oct-19	(63,336)	92,149	28,813
	Nov-15	(11,189)	56	(11,133)	FAC 124	Nov-19	(127,797)	(176,809)	(304,606)
FAC 108	Dec-15	107,750	275	108,025		Dec-19	55,128	288,706	343,834
	Jan-16	4,008	(158,971)	(154,963)		Jan-20	8,124	822,164	830,288
	Feb-16	42,303	99,879	142,182	FAC 125	Feb-20	167,028	734,375	901,403
FAC 109	Mar-16	(10,943)	-	(10,943)		Mar-20	478,268	142,803	621,071
	Apr-16	(73,104)	-	(73,104)		Apr-20	(27,412)	(91,798)	(119,210)
	May-16	210,381	206	210,587	FAC 126	May-20	13,649	98,195	111,844
FAC 110	Jun-16	(522,768)	344	(522,424)		Jun-20	(190,687)	207,075	16,388
	Jul-16	39,637	(380,631)	(340,994)		Jul-20	145,347	439,678	585,025
	Aug-16	(49,953)	(319,323)	(369,276)	FAC 127	Aug-20	(139,093)	102,727	(36,366)
FAC 111	Sep-16	(530,972)	-	(530,972)		Sep-20	17,764	148,875	166,639
	Oct-16	(590,638)	-	(590,638)		Oct-20	29,555	40,767	70,322
	Nov-16	362,017	-	362,017	FAC 128	Nov-20	29,142	77,356	106,498
FAC 112	Dec-16	(402,267)	275	(401,992)		Dec-20	39,209	277,476	316,685
	Jan-17	171,977	138,618	310,595		Jan-21	(66,730)	278,001	211,271
	Feb-17	96,778	260,250	357,028	FAC 129	Feb-21	(793,928)	(16,730,143)	(17,524,071)
FAC 113	Mar-17	274,890	-	274,890		Mar-21	597,524	394	597,918
	Apr-17	(132,532)	-	(132,532)		Apr-21	(1,260,987)	(54,713)	(1,315,700)
	May-17	(235,223)	183	(235,040)	FAC 130	May-21	(131,366)	(189,882)	(321,248)
FAC 114	Jun-17	177,532	379	177,911		Jun-21	(612,947)	(313,050)	(925,997)
	Jul-17	(112,188)	270,432	158,244		Jul-21	5,581	(945,164)	(939,583)
	Aug-17	68,662	295,767	364,429	FAC 131	Aug-21	(32,084)	(1,183,393)	(1,215,477)
FAC 115	Sep-17	(1,896,041)	131	(1,889,910)		Sep-21	(200,546)	(1,486,458)	(1,687,004)
	Oct-17	50,357	54	50,411		Oct-21	(4,830,659)	(1,587,611)	(6,418,270)
	Nov-17	17,121	242	17,363	FAC 132	Nov-21	(6,748,364)	(673,721)	(7,422,085)
						Dec-21	22,063,830	2,417,780	24,481,610
						Jan-22	2,369,910	4,395,114	6,765,024
						Feb-22	3,470,198	991,456	4,461,654
									-
					Total		\$14,480,658	(\$10,784,981)	\$3,695,677

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.



By: Michael D. Eckert
Director of the Electric Division
Indiana Office of Utility Consumer Counselor

Cause No. 38707 FAC-132
DEI, LLC

Date: June 2, 2022

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor Public's Exhibit No. 2 Testimony of OUCC Witness Michael D. Eckert* has been served upon the following counsel of record in the captioned proceeding by electronic service on June 2, 2022.

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