STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF DUKE ENERGY INDIANA, INC. FOR; (1) APPROVAL OF PETITIONER'S 6-YEAR PLAN FOR ELIGIBLE TRANSMISSION, DISTRIBUTION AND STORAGE SYSTEM IMPROVEMENTS, PURSUANT TO IND. CODE § 8-1-39-10; (2) APPROVAL OF A TRANSMISSION AND DISTRIBUTION INFRASTRUCTURE IMPROVEMENT COST RATE ADJUSTMENT AND DEFERRALS, PURSUANT TO IND. CODE §§ 8-1-2-10, 8-1-2-12, 8-1-2-14, AND 8-1-39-1 *ET SEQ*; AND (3) APPROVAL OF A TARGETED ECONOMIC DEVELOPMENT PROJECT AND RECOVERY OF COSTS ASSOCIATED WITH THE PROJECT, PURSUANT TO IND. CODE §§ 8-1-39-10 AND 8-1-39-11	)	**CAUSE NO. 45647**

VERIFIED DIRECT TESTIMONY
OF
STAN C. PINEGAR

On Behalf of Petitioner,
DUKE ENERGY INDIANA, LLC

Petitioner's Exhibit 1

November 23, 2021

DIRECT TESTIMONY OF STAN C. PINEGAR
PRESIDENT, DUKE ENERGY INDIANA, LLC
BEFORE THE
INDIANA UTILITY REGULATORY COMMISSION

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Stan C. Pinegar, and my business address is 1000 East Main Street, Plainfield, IN 46168.

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

A. I am President of Duke Energy Indiana, LLC ("Duke Energy Indiana" or "Company"), a wholly-owned subsidiary of Duke Energy Indiana Holdco, LLC and an affiliate of Duke Energy Corp. ("Duke Energy").

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. I earned an undergraduate degree from Indiana University in 1986. I hold a Bachelor of Arts Degree in both Political Science and History as well as a Teaching Certificate. In 1990, I earned a Doctor of Jurisprudence Degree from the Indiana University McKinney School of Law in Indianapolis. Upon graduation, I practiced law at the Indianapolis law firm Johnson, Smith, Densborn, Wright & Heath before joining the Indiana Department of Revenue in the capacity of Deputy Commissioner and General Counsel in 1991. The bulk of the remainder of my professional career has been focused on state-level advocacy and government affairs roles for various Indiana entities. I joined the Indiana Petroleum Council in 1993 as Associate Director and was promoted to Executive

Director of the organization in 1997. I joined the Indiana Chamber of Commerce in 2002 as the Director of Tax and Public Finance. In 2004, I joined the Indiana Energy Association ("IEA") as Vice President. I was promoted to the position of President and Chief Executive Officer of the IEA in 2011. I joined Duke Energy Indiana as Vice President of Government Affairs in 2012 and maintained that role until being appointed President of Duke Energy Indiana in November of 2018. The positions I held prior to my current role allowed me to work closely with policymakers in all branches of Indiana government and associated external stakeholders. My focus was primarily the Indiana legislative and regulatory arenas, working on a variety of topics, including utility, energy, taxation, environmental, land use and commercial issues. I have been a member of the Indiana Bar since 1990 and a registered lobbyist in Indiana since 1993.

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

A. My testimony will provide an overview of Duke Energy Indiana's Transmission, Distribution, and Storage System Improvement Charge investment plan for 2023-2028 ("TDSIC 2.0"). I'll explain what we are requesting in this proceeding and why these investments are needed now to improve our delivery system for the benefit of our customers. I will briefly discuss the key customer benefits of TDSIC 2.0. I'll provide a high-level overview of the TDSIC 2.0 investment plan components, costs, and rate impacts. I'll also touch on the overall economic impact benefits this TDSIC Investment Plan will provide to the State of Indiana.

Finally, I'll summarize the testimony topics of the other Duke Energy Indiana witnesses, and explain how Duke Energy Indiana's TDSIC 2.0 is in the public interest.

Q. PLEASE SUMMARIZE DUKE ENERGY INDIANA'S REQUEST IN THIS PROCEEDING.

A. In accordance with Indiana Code § 8-1-39-10, Duke Energy Indiana requests Commission approval of its TDSIC 2.0 investment plan, as further detailed in the testimony of Duke Energy Indiana witnesses Mr. Jeremy Lewis, Mr. Martin Dickey, and Ms. Erin Schneider. Specifically, the Company requests: (1) a finding that the projects contained in TDSIC 2.0 are "eligible transmission, distribution, and storage system improvements" within the meaning of Indiana Code § 8-1-39-2; (2) a finding of the best estimate of the cost of the eligible improvements included in TDSIC 2.0; (3) a determination that the public convenience and necessity require or will require the eligible improvements included in TDSIC 2.0; and (4) a determination that the estimated costs of the eligible improvements included in TDSIC 2.0 are justified by incremental benefits attributable to TDSIC 2.0.

If and to the extent the Commission determines that the Company's proposed TDSIC 2.0 investment plan is reasonable, Duke Energy Indiana requests that the Commission designate the eligible transmission and distribution system improvements included in TDSIC 2.0 as eligible for treatment in accordance with Indiana Code § 8-1-39-9. The Company requests the Commission approve its

ratemaking and accounting proposals contained in the testimony of Duke Energy Indiana witness Ms. Maria T. Diaz, including recovery of 80% of the TDSIC 2.0 costs in Standard Contract Rider No. 65 ("TDSIC Rider"), and deferral with carrying costs of 20% of the TDSIC 2.0 costs, among other requests. The Company also requests that the Commission approve Petitioner's proposed process for updating TDSIC 2.0 in future TDSIC Rider proceedings as outlined by Mr. Lewis's testimony. See Petitioner's Exhibit 1-A for a copy of the Verified Petition initiating this proceeding.

II. TDSIC 2.0

Q. WHY IS DUKE ENERGY INDIANA PROPOSING A SECOND PLAN TO INVEST IN ITS TRANSMISSION AND DISTRIBUTION SYSTEM?

A. As this Commission is aware, the Company is in year six of its first seven-year TDSIC investment plan ("TDSIC 1.0"). The initial TDSIC plan for Duke Energy Indiana targeted the significant number of transmission and distribution assets that were approaching or had exceeded their estimated physical service life. As more fully described in the testimony of Mr. Lewis, Duke Energy Indiana is on track to complete the committed scope from TDSIC 1.0 within the $1.4 billion cap and this investment has resulted in a significant reduction in the risk of grid asset failure. There is still a need for replacing aging infrastructure on the system and some of the projects in TDSIC 2.0 are focused on that. However, the goals of the program have shifted to prioritization of projects that provide reliability benefits to customers, such as reduction of frequency and duration of interruptions,

hardening and resiliency of the grid (better able to withstand weather events and the ability to recover more quickly when outages inevitably occur), and modernizing the grid to manage the ever-growing renewable, distributed generation on our system.

TDSIC 2.0 will improve the reliability, flexibility, and capacity of our grid to meet growing customer expectations, demands, and needs. Our customers expect: (1) our technology will proactively inform the utility of service needs and outages; (2) restoration times will be minimized, to the extent possible, after major storms or other service interruptions; and (3) interruptions and outages, that are much more impactful to customers' lives and digital interfaces, will be reduced. Our commitment to customer value through our TDSIC investment is evident in the rigorous cost to benefit analysis that has been utilized to ensure the Company is selecting projects that provide optimal value for our customers.

As detailed by Duke Energy Indiana's other witnesses in this proceeding, the Company is providing expected project scope and project cost estimates broken down into material, labor, indirects, allowance for funds used during construction ("AFUDC"), O&M, as well as a level of contingency for the overall TDSIC 2.0 investment plan. Mr. Lewis and Mr. Dickey discuss our cost estimate process for all years of the plan. Additionally, Black & Veatch witness Mr. Jim Shields provides a third-party review of the cost estimating process, the use of the International Association for the Advancement of Cost Engineering International ("AACE") standards, and the cost estimates themselves. TDSIC 2.0 is focused on

the reliability and resiliency our customers value and expect now and in the future.

Q. WHAT ARE PRESENT-DAY CUSTOMER EXPECTATIONS?

A. Today's customers demand an improved level of service because their homes, their devices, and their daily lives are increasingly more sophisticated. Our customers expect more frequent and more detailed communications and information about their home's electricity usage, as well as the ability to control that usage through smart thermostats and other devices and programs. More and more of our customers are purchasing electric vehicles, which require at-home charging. With the global pandemic, reliable electric service has become even more important as our customers work and educate in their homes. Even as the pandemic wanes, we expect continued remote work and schooling options as businesses and schools shift to hybrid models that provide greater flexibility. Even more customers are considering options of rooftop solar that require enhanced metering and switching technology to reliably work with the grid. All of these scenarios expand the expectations of our customers that the Company's equipment and technology will inform us in real-time of their service needs and allow us to manage any outages proactively. We know that reliability of service is job number one for electric service providers. Our customers expect reliable service every single day and night and, when disruption occurs, they expect us to quickly fix the issue.

One annual customer survey, the J.D. Power's Electric Utility Customer Satisfaction Survey reflects overall customer satisfaction in six areas: power quality and reliability, price, billing and payment, communications, corporate citizenship, and customer service. The latest data available is from 2020, when Duke Energy Midwest, which includes Duke Energy Indiana, saw its year over year score from J.D. Power improved. For Duke Energy Indiana, power quality and reliability were the top drivers in the 2019 annual J.D. Power Residential Survey, followed closely by price.

So, even as we appreciated the investments provided in the plan need to be undertaken, we have maintained a keen eye on related costs and impact on customers' bills. We limit the overall average annual rate impact to about 1% which we believe provides and appropriate balance of priorities and well below the 2% increase allowed by the TDSIC statute.[1] The testimony of Duke Energy Indiana witness Ms. Maria Diaz provides a detailed breakdown of the proposed rate impact.

Q. DO EXISTING AND POTENTIAL COMMERCIAL AND INDUSTRIAL CUSTOMERS ALSO HAVE CHANGING SERVICE EXPECTATIONS?

A. Yes. In addition to their focus on reliable service, our commercial and industrial customers also increasingly care about access to renewable energy sources. Duke Energy Indiana often receives requests from current and potential customers to provide them with additional clean energy options. In addition to improving

[1] Indiana Code § 8-1-39-14.

reliability to customers, our proposed TDSIC 2.0 investments also help facilitate the expansion of renewable and distributed generation for all customers.

Over the course of the past three years, I have had the opportunity to visit with over 40 or our largest customers and I have definitively heard that reliability and power quality are both key factors to their success. The TDSIC 2.0 plan includes technology that improves reliability, increases power quality, and minimizes momentary outages.

Finally, adequate capacity and reliable service are attractive to companies looking to locate and expand in our state. We've seen first-hand that industries looking to locate in Indiana require larger, new, and expanded service characteristics for their businesses, all of which bring investment and jobs to the State. Those entities also expect their prospective utility to have ample energy capacity in place at their chosen sites in a much more immediate fashion than in the past. That's why we plan to seek approval of various Targeted Economic Development projects during the execution of TDSIC 2.0, as explained further in the testimony of Duke Energy Indiana witness Ms. Erin Schneider.

Q. DOES THE TDSIC 2.0 INVESTMENT PLAN INCLUDE SPECIFIC PLANNING OBJECTIVES?

A. Yes. Duke Energy Indiana's objectives for its proposed TDSIC 2.0 investment plan include:

- Improve reliability for Indiana customers
- Advance grid hardening and resiliency
- Enable expansion of renewable and distributed generation

- Facilitate economic development growth

The testimony of Mr. Lewis and Mr. Dickey provide more details about these planning objectives, but I will emphasize, at a high level, why these are the main focus of our TDSIC 2.0 investment plan. Improving reliability is a constant and continuing focus for Duke Energy Indiana's operations. It's what our customers want and expect, and we intend to deliver. Hardening the grid is just one aspect of improving reliability. Those investments serve to prevent events that impact our reliability from even occurring. The best outage or momentary service interruption is the one that never happens in the first place. Of course, we cannot prevent all outages, so resiliency is also an area of constant focus. Our plan will provide grid modernization needed to put customers back online faster after an event does occur. Our proposed investments will allow for improved and increased access to the grid by distributed and renewable generation sources. Finally, by growing, strengthening, and improving our transmission and distribution systems, we provide another incentive for economic development growth in our communities, providing jobs and investment in Indiana.

Q. ISN'T DUKE ENERGY INDIANA'S TRANSMISSION AND DISTRIBUTION SYSTEM ALREADY RELIABLE?

A. It is, but we believe there is still more work to be done. Given the expansion of Distributed Energy Resources ("DER") and electrification trends, maintaining reliability requires investing for customer preferences on the horizon. Much of the Duke Energy Indiana system is over 40 years old and that is not lost on us as

we build a plan of this magnitude. Our intent with the TDSIC 2.0 Investment Plan is to ensure we maintain reliability going forward and prepare the grid for what's to come. To honor this commitment, it is important to continue evolving our grid through measured investments that will avoid future customer interruptions ("CI") and customer minutes interrupted ("CMI").

Q. PLEASE SUMMARIZE THE PRIMARY COMPONENTS OF TDSIC 2.0.

A. Duke Energy Indiana's proposed TDSIC 2.0 Investment Plan includes capital investments in both Transmission and Distribution systems that align with the aforementioned objectives.

The investments in the transmission system were selected to enhance system reliability, hardening, safety, and resiliency of substations and transmission lines. The six-year transmission plan includes 70 distinct projects on 50 transmission lines, and investment in transmission assets is included in 115 projects at 103 substations. Primary asset improvements to the transmission delivery system, include investments in substations, communication and monitoring assets, transformers, circuit breakers, switches, controls, relays, poles, and towers.

The investments in the distribution system are also intended to greatly enhance the reliability, hardening, safety, and resiliency of our delivery system. These goals include investments in infrastructure components such as substations, circuit breakers, reclosers, switches, controls, relays, transformers, capacitors, distribution poles, circuits, and conductor. For instance, the six-year distribution

plan includes thousands of projects that include improvements to the distribution assets at 458 substations and 23 project categories touching 1272 distribution circuits. Many distribution investments also modernize our grid through the installation of technology which leverages recent advancements in system automation equipment. Those targeted investments will increase functionality and flexibility of the overall system resulting in enhanced reliability. Included are investments in programs such as self-optimizing grid investments, targeted undergrounding, automated lateral devices), and Integrated Volt-VAR Control.

Q. HOW WILL THESE PROPOSED INVESTMENTS PROVIDE BENEFITS FOR DUKE ENERGY INDIANA CUSTOMERS?

A. TDSIC 2.0 will improve reliability, advance hardening and resiliency, enable distributed energy renewable expansion, and facilitate economic growth. Each of these objectives promote customer benefits.

The primary objective is to show reliability improvement. While some measurements of circuit and system reliability will continue to be impacted by factors beyond the utility's control, like storms, vehicle accidents, and vegetation. Duke Energy Indiana expects to show a measurable improvement to reliability through these investments. The Company expects to do that over the six-year period by measuring CI and CMI avoided, which after the successful implementation of TDSIC 2.0, will produce a minimum 19% improvement to System Average Interruption Duration Index ("SAIDI") and a minimum 17% improvement to System Average Interruption Frequency Index ("SAIFI"). The

testimony of Mr. Jeremy Lewis expands on this and proposes a tracking metric to be used following the execution of the program.

Further, the Company is dedicated to building a smarter energy future for our customers by making investments to strengthen the electric grid. Our proposed investments will continue our effort to harden our grid against severe weather events by strengthening assets such as poles, towers, and transformers, which is critical to reducing outages and creates a solid foundation to take advantage of the newer technology required to advance resiliency. Improving our system's resiliency means that our customers will benefit from fewer outages with shorter duration when outages inevitably do occur.

Q. HOW WILL TDSIC 2.0 ADVANCE HARDENING AND RESILIENCY?

A. Duke Energy Indiana aims to maintain and improve the overall reliability of the delivery system for Indiana customers. To that end, TDSIC 2.0 includes investments to advance the hardening and resiliency of the transmission and distribution grid. Duke Energy Indiana views hardening as physically changing the infrastructure to make it less susceptible to damage from even major events. Duke Energy Indiana's transmission and distribution programs are targeted at hardening through sub-programs such as line rebuilds, pole upgrades and replacements, installation of intermediate dead-end structures to mitigate cascading events, targeted underground to reduce vegetation outages, transformer replacements, and uprating 4kV lines to 12kV.

While hardening is making the asset or grid stronger, resiliency is about making the grid smarter and better able to recover from events quicker. The Self Optimizing Grid and Automated Lateral Device investments are key programs contributing to the Distribution system resiliency through improvements to restoration times. Transmission system resiliency investments allow for rapid recovery by adding redundant capabilities, and leveraging system intelligence to remotely locate, sectionalize, and assess damage. The installation of Supervisory Control and Data Acquisition ("SCADA") to transmission switches and substations, and relay upgrades are key programs contributing to resiliency on the Transmission system.

Q. HOW WILL TDSIC 2.0 FACILITATE INCREASED DISTRIBUTED AND RENEWABLE ENERGY INVESTMENTS IN THE STATE?

A. The Company's proposed TDSIC 2.0 investments will advance a grid architecture that supports a two-way smart-thinking grid to enable the expansion of DER and electric vehicles. The Company intends to modernize and expand system intelligence and control, and eight of the proposed programs in TDSIC 2.0 help to enable future distributed and renewable energy resources. Simply stated, the grid system in Indiana, as with most grids today, is built on a one-way power flow from the generation resources through transmission lines and substations on to distribution substations and lines which feed the customer. It is not adaptable to intelligently accept the sustained growth of distributed energy resources such as wind, solar, and battery storage from customer systems. A two-way smart-

thinking grid is a grid system that is networked through circuit ties and programable digital assets that can intelligently detect, rapidly react, and proactively adapt to changes in usage. Additionally, a two-way smart-thinking grid enables customers to become active participants in our grid system by installing assets like rooftop solar and premise level storage.

Q. IS DUKE ENERGY INDIANA ALSO INCLUDING TARGETED ECONOMIC DEVELOPMENT PROJECTS FOR CONSIDERATION IN THIS PROCEEDING?

A. Yes. Economic development projects are bustling in the Midwest. The Company recognizes the importance of capturing these opportunities for the State of Indiana. That is why Duke Energy Indiana is requesting a subdocket to address approval of the proposed River Ridge Commerce Center Project as a targeted economic development project. As further described by Ms. Schneider, with our investment in additional infrastructure, the proposed River Ridge Commerce Center Project will increase capacity on the Company's transmission system at a key site for existing and prospective businesses, bringing more jobs and capital investment to Indiana. Ms. Schneider will explain how the River Ridge Commerce Center Project fits in with state and local economic development efforts, what Duke Energy Indiana would have to do to achieve the benefits, and how it is positioned to attract more development and capital investment to the area. The River Ridge Commerce Center Project alone represents a $44 million investment with an estimated 8,000 jobs and $3 billion in new capital investment.

Additionally, there are other targeted economic development projects we expect to bring to the Indiana Economic Development Commission ("IEDC") and this Commission as areas of growth in our service territory continue to develop.

Q. PLEASE SUMMARIZE THE ESTIMATED COSTS OF TDSIC 2.0.

A. Following is a table showing the major categories of investments included in TDSIC 2.0. Additional details of these TDSIC 2.0 components and their associated cost estimates are included in the testimony of Ms. Schneider and Messrs. Lewis and Dickey.

Duke Energy Indiana - TDSIC 2.0 System Improvement Plan				
Line No.	Project Category	2023 - 2028		
		Capital	Project O&M	Cap & O&M Total
1	Distribution System Circuit Improvements	$704,060,933	$108,273,358	$812,334,291
2	Distribution System Substation Improvements	$176,965,506	$41,837	$177,007,344
3	Total Distribution - Contingency	$155,475,254	$0	$155,475,254
4	**Total Distribution System Improvements**	**$1,036,501,694**	**$108,315,195**	**$1,144,816,889**
5	Transmission System Line Improvements	$494,662,048	$22,610,931	$517,272,980
6	Transmission System Substation Improvements	$198,038,203	$0	$198,038,203
7	Total Transmission - Contingency	$122,241,221	$0	$122,241,221
8	**Total Transmission System Improvements**	**$814,941,472**	**$22,610,931**	**$837,552,403**
9	**Total TDSIC 2.0 Improvements**	**$1,851,443,166**	**$130,926,126**	**$1,982,369,292**
10	Targeted Economic Development - Identified Projects	$44,143,497	$0	$44,143,497
11	Targeted Economic Development - Potential Transmission Improvements	$90,000,000	$0	$90,000,000
12	Total Targeted Economic Development - Contingency	$23,672,382	$0	$23,672,382
13	**Total Improvement Plan**	**$2,009,259,044**	**$130,926,126**	**$2,140,185,171**

It is important to note that these are our best estimates of the costs at this time, and we expect them to change over time as each year progresses and we

move to more detailed engineering and construction. We have estimated the expected expenditures using industry standards and the rigor of the AACE process. As TDSIC 2.0 progresses and we get closer in time to the expected expenditures when project parameters can be identified with more specificity and detailed engineering work is completed, the confidence in the cost estimates of the upcoming project year will increase as each year passes.

TDSIC 2.0 is building on subject matter expertise and knowledge gained from our first TDSIC plan and leverages the investments already made. A major advancement of TDSIC 2.0 is the rigorous planning and cost benefit analysis that went into selecting the right projects, on the right circuits, at the right time, for the customers' benefit. In addition, our program and cost estimates have been reviewed for reasonableness by Black & Veatch (see testimony of Mr. Jim Shields), giving us increased confidence in our estimating approach and product. As TDSIC 2.0 develops, engineering progresses, and contracts are entered into for labor, materials, and construction, we will update our cost estimates in future TDSIC 2.0 plan update filings.

Q. PLEASE PROVIDE AN OVERVIEW OF THE COMPANY'S RATEMAKING PROPOSAL AND RATE IMPACTS ASSOCIATED WITH TDSIC 2.0.

A. As provided for by Indiana Code 8-1-39, Duke Energy Indiana is requesting approval for recovery of 80% of TDSIC 2.0 costs through the TDSIC Rider. The

remaining 20% will be deferred with carrying costs to be recovered in subsequent retail electric base rate cases.

When developing TDSIC 2.0, the Company was focused on the need to balance customer rate impacts with the need and value of the projects included in TDSIC 2.0. As a result, the average annual rate impact is approximately 1%, well below the 2% annual cap permitted by Indiana Code 8-1-39. Note that although the Company proposes that the first year of TDSIC 2.0 be calendar year 2023, the rate impact is not expected to begin until calendar year 2024, after approval of the first TDSIC 2.0 Rider. The testimony of Duke Energy Indiana witness Ms. Diaz provides the details of the Company's ratemaking requests and rate impact analysis.

Q. IN ADDITION TO THE TARGETED ECONOMIC DEVELOPMENT PROJECTS DISCUSSED ABOVE, WILL THE OVERALL TDSIC 2.0 INVESTMENT PLAN PROVIDE OTHER ECONOMIC BENEFITS TO THE STATE OF INDIANA?

A. Yes, we expect that the investments on the transmission and distribution systems will bring economic benefit to Indiana and the communities we serve. Economic development is one of the enumerated purposes of Indiana Code 8-1-39, and we worked with the Indiana University Indiana Business Research Center ("IBRC") to perform an Economic Impact Study on the transmission and distribution projects, excluding the targeted economic development projects mentioned above. Petitioner's Exhibit 2-D (JKL) shows the full IBRC study of estimated economic

development impact of the planned investments. Again, excluding the targeted economic impact projects, the level of expenditures anticipated in TDSIC 2.0 is estimated to create or support about 1,270 jobs per year, in the state of Indiana, for each of the six years. These jobs include both direct jobs and indirect or induced jobs that are created or supported by the TDSIC 2.0 investment. Further, the expected pay-range (with benefits) is estimated to be $135,000 on average. The TDSIC 2.0 investments are also estimated to produce about $4.3 million in additional state and local tax revenue and $215 million in gross domestic product annually over the six-year period.

The jobs directly created from this investment will be a mix of contractor and direct employee hires and could include construction and maintenance, engineering, project management, operating and other technical support positions. Further, the Company's contracting strategy encourages contractors to include local and diverse talent in their contracted workforce.

III. CONCLUSION

Q. COULD YOU PLEASE PREVIEW THE TESTIMONIES OF THE COMPANY'S WITNESSES IN THIS PROCEEDING, INCLUDING WHICH ISSUES THEY WILL DISCUSS?

A. Yes, following the guidelines established by Commission GAO 2020-05(II)(B), below is a table listing the Duke Energy Indiana witnesses and the topics covered in their respective testimonies.

Duke Energy Indiana TDSIC 2.0 Direct Testimony Witnesses		
Stan C. Pinegar, President, Duke Energy Indiana	• Why propose TDSIC 2.0? • Customer benefits of the TDSIC 2.0 • TDSIC 2.0 overview • Economic impacts of TDSIC 2.0	• Exhibit No. 1
Jeremy K. Lewis, Director, Customer Delivery Project Management	• Overview of the TDSIC 2.0 • Expected customer benefits from our TDSIC 2.0 investments • Explanation of the overall TDSIC 2.0 investments and cost estimates • Details of distribution system projects • TDSIC 2.0 cost estimates • Black & Veatch Cost Estimate Review • Indiana University Indiana Business Research Center ("IBRC") Economic Impact Study	• Exhibit No. 2 • Confidential Workpaper 1-JKL
Martin D. Dickey, Vice President, Transmission Construction & Maintenance	• Details of transmission system projects • Expected customer benefits from TDSIC 2.0 transmission investments • TDSIC 2.0 transmission system cost estimates	• Exhibit No. 3 • Confidential Workpapers 1-MDD and 2-MDD
James W. Shields, Principal Consultant, Black & Veatch Management Consulting LLC	• TDSIC 2.0 project and program selection using Copperleaf • AACE cost estimate review	• Exhibit No. 4
Erin Schneider, Director Economic Development	• Targeted Economic Development projects	• Exhibit No. 5 • Confidential Workpapers 1-ES and 2-ES
Maria T. Diaz, Director Rates and Regulated Planning	• Compliance with statutory provisions • Requested ratemaking • Rate impacts	• Exhibit No. 6 • Workpapers 1-MTD thru 16-MTD

Q. IS DUKE ENERGY INDIANA'S TDSIC 2.0 REASONABLE AND IN THE PUBLIC INTEREST?

A. Yes. The public convenience and necessity requires, or will require, the improvements included in the Company's TDSIC 2.0. The Company has provided its best estimate of costs of TDSIC 2.0. The Company has demonstrated that the estimated costs of the improvements included in TDSIC 2.0 are justified by incremental benefits attributable to TDSIC 2.0. TDSIC 2.0 is reasonable and provides substantial customer benefits, while limiting investments to those needed to maintain a reasonable level of reliability, to modernize the grid responsibly, and to minimize rate impacts. Duke Energy Indiana performed an investment plan analysis that established the greatest value to our customers. A focus on continuing to provide increasingly reliable service to our customers was balanced with managing the program's rate impact.

Q. DOES THIS CONCLUDE YOUR PREFILED TESTIMONY?

A. Yes, it does.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF DUKE ENERGY INDIANA, LLC FOR; (1) APPROVAL OF PETITIONER'S 6-YEAR PLAN FOR ELIGIBLE TRANSMISSION, DISTRIBUTION AND STORAGE SYSTEM IMPROVEMENTS, PURSUANT TO IND. CODE § 8-1-39-10; (2) APPROVAL OF A TRANSMISSION AND DISTRIBUTION INFRASTRUCTURE IMPROVEMENT COST RATE ADJUSTMENT AND DEFERRALS, PURSUANT TO IND. CODE §§ 8-1-2-10, 8-1-2-12, 8-1-2-14, AND 8-1-39-1 *ET SEQ*; AND (3) APPROVAL OF A TARGETED ECONOMIC DEVELOPMENT PROJECT AND RECOVERY OF COSTS ASSOCIATED WITH THE PROJECT, PURSUANT TO IND. CODE §§ 8-1-39-10 AND 8-1-39-11	)	**CAUSE NO.** 45647

VERIFIED PETITION

Duke Energy Indiana, LLC (hereinafter referred to as "Petitioner," "Company" or "Duke Energy Indiana") respectfully petitions the Indiana Utility Regulatory Commission ("Commission") for: (1) approval of Petitioner's 6-year plan for eligible transmission, distribution and storage system improvements ("TDSIC 2.0") pursuant to Ind. Code § 8-1-39-10; (2) approval of a Transmission and Distribution Infrastructure Improvement Cost Rate Adjustment and deferrals pursuant to Ind. Code § 8-1-39-9; and (3) approval of a targeted economic development project and recovery of costs associated with the project, pursuant to Ind. Code § 8-1-39-10 and 8-1-39-11. In support of this Verified Petition, Duke Energy Indiana states as follows:

1. **Petitioner's Corporate and Regulated Status.** Duke Energy Indiana is a public utility corporation organized and existing under the laws of the State of Indiana with its principal office at 1000 E. Main Street, Plainfield, Indiana 46168, and is a wholly-owned subsidiary of Duke

Energy Indiana Holdco, LLC. It has the corporate power and authority to engage in the business of supplying electric utility service to the public in the State of Indiana. Accordingly, Petitioner is a "public utility" within the meaning of that term as used in the Indiana Public Service Commission Act, as amended, Ind. Code § 8-1-2-1 *et seq*., and specifically, as used in Ind. Code § 8-1-39-4, and is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana, including Ind. Code § 8-1-2-1 *et seq*.

2. **Petitioner's Electric Utility Service.** Duke Energy Indiana owns, operates, manages and controls plants, properties and equipment used and useful for the production, transmission, distribution and furnishing of electric utility service to the public in the State of Indiana. It directly supplies electric energy throughout its 22,000 square mile service area to approximately 860,000 customers located in 69 counties in the State of Indiana. Petitioner also sells electric energy for resale to Wabash Valley Power Alliance, Indiana Municipal Power Agency and to other public utilities that in turn supply electric utility service to numerous customers in areas not served directly by Petitioner.

3. **Relief Requested**. Petitioner respectfully requests Commission approval of its TDSIC 2.0 investment plan, which also includes a targeted economic development project, in accordance with Ind. Code § 8-1-39-10. Specifically, Petitioner requests: (a) a finding that the projects contained in TDSIC 2.0 are "eligible transmission, distribution, and storage system improvements" within the meaning of Ind. Code § 8-1-39-2; (b) a finding of the best estimate of the cost of the eligible improvements included in TDSIC 2.0; (c) a determination that the public convenience and necessity require or will require the eligible improvements included in TDSIC 2.0; and (d) a determination that the estimated costs of the eligible improvements included in TDSIC 2.0 are justified by incremental benefits attributable to the TDSIC Plan. If and to the extent

the Commission determines that TDSIC 2.0 is reasonable, Duke Energy Indiana requests the Commission approve TDSIC 2.0, and designate the eligible transmission, distribution and storage system improvements included in TDSIC 2.0 as eligible for Transmission, Distribution and Storage System Improvement Charge treatment in accordance with Ind. Code § 8-1-39-9. Petitioner requests the Commission approve its ratemaking proposals, including recovery of 80% of the TDSIC 2.0 costs via Standard Contract Rider No. 65 ("TDSIC Rider"), and deferral with carrying costs of 20% of the TDSIC 2.0 costs for subsequent recovery in Petitioner's next general retail electric base rate case. Petitioner also requests that the Commission approve Petitioner's proposed process for updating the TDSIC 2.0 Plan in future annual proceedings.

4. **Allocation Factors**. Ind. Code § 8-1-39-9(a)(1) requires Petitioner to use the customer class revenue allocation factors based on firm load approved in the public utility's most recent retail base rate case order. Petitioner is proposing that the TDSIC 2.0 costs be allocated in conformity with the revenue allocation factors approved in its last retail base rate case (Cause No. 45253).

5. **TDSIC 2.0 Plan Projects.** In accordance with Ind. Code § 8-1-39-9(a), Petitioner's TDSIC 2.0 investment plan and associated ratemaking requests are detailed in the prefiled case-in-chief testimony, exhibits and workpapers of Duke Energy Indiana. The TDSIC 2.0 projects and expenditures are specifically found in the following Duke Energy Indiana exhibits and workpapers, which have been filed concurrent with this Petition. The first Exhibit referenced below is attached hereto as Attachment 1. However, due to the voluminous nature of the remainder of the exhibits, they are incorporated into this Petition by reference, as required in Ind. Code § 8-1-39-9(a)(2).

6. **Duke Energy Indiana TDSIC 2.0 Exhibits and Workpapers.**

- Cost Estimate Overview for all TDSIC 2.0 Projects – Petitioner's Exhibit 2-A (JKL)
- Distribution Circuit Detailed Cost Estimates – Petitioner's Confidential Exhibit 2-B (JKL)
- Distribution Circuit Workplan – Petitioner's Confidential Exhibit 2-C (JKL)
- Sortable Excel of Distribution Circuit Workplan – Petitioner's Confidential Workpaper 1-JKL
- Transmission & Distribution Substation and Transmission Line Detailed Cost Estimates – Petitioner's Confidential Exhibit 3-A (MDD)
- Sortable Excel of Transmission Substation Workplan – Petitioner's Confidential Workpaper 1-MDD
- Sortable Excel of Transmission Line Workplan – Petitioner's Confidential Workpaper 2-MDD
- Black & Veatch Investment Plan Report – Petitioner's Exhibit 4-A (JWS)

7. **Estimated Customer Rate Impact**. In accordance with Ind. Code § 8-1-39-9(a)(3), Petitioner is required to project the effects of TDSIC 2.0 on retail rates and charges. The estimated annual rate impacts for the proposed TDSIC Rider are shown on the chart below:

Duke Energy Indiana T&D Infrastructure Improvement Cost Rate Adjustment Average Annual Retail Rate Impact						
2024	**2025**	**2026**	**2027**	**2028**	**2029**	**AVG**
0.52%	1.88%	1.05%	1.44%	1.00%	0.12%	0.86%

8. **Timing of Petition.** In accordance with Ind. Code § 8-1-39-9(d), Petitioner is not filing this petition within nine (9) months after the date on which the Commission issued an order

changing Petitioner's basic rates and charges. The date of Petitioner's most recent retail base rate order was June 29, 2020 in Cause No. 45253.

9. **Procedural Schedule.** Pursuant to 170 IAC 1-1.1-9, Petitioner, the Indiana Office of Utility Consumer Counselor ("OUCC"), and the following parties reasonably anticipated to participate in this proceeding: Citizens Action Coalition of Indiana, Inc., Duke Energy Industrial Group, Nucor Steel-Indiana, and Steel Dynamics, Inc. (collectively the "Parties") are in agreement with the following procedural schedule:

(i) November 23, 2021 – Duke Energy Indiana files its Petition and case-in-chief testimony;

(ii) February 16, 2022 – OUCC and Intervenors shall file their respective cases-in-chief;

(iii) March 9, 2022 – Duke Energy Indiana shall file its rebuttal testimony;

(iv) March 9, 2022 – OUCC and Intervenors shall file any cross-answering testimony;

(v) Pursuant to Ind. Code § 8-1-39-10, Petitioner requests a hearing be conducted not more than 120 days from the date of this Petition. If the Commission's schedule allows, Petitioner, OUCC, and Parties request that the Commission schedule an evidentiary hearing on March 23, 2022.

(vi) Pursuant to Ind. Code § 8-1-39-10, Petitioner requests a final Commission order approving the relief sought in this Petition by June 21, 2022, which is not more than 210 days from the date this petition is filed.

Any response to formal discovery should be made within ten (10) calendar days of the receipt of such request. Responses to formal discovery should be made within five (5) calendar days after rebuttal. Any discovery requests served after 5:00 p.m. EDT Monday through Thursday

or noon on a Friday or before a state holiday shall be deemed received on the following business day. Petitioner, OUCC, and the Parties agree that there will be blackout dates for discovery from December 23, 2021 through January 3, 2022. Dates designated as "blackout dates" shall not be included in determining the number of days provided for responding to a discovery request. Petitioner, OUCC, and Parties consent to electronic discovery.

10. **Applicable Law**. Duke Energy Indiana considers Indiana Code §§ 8-1-2-19, -23 and Ind. Code Ch. 8-1-39, among others, as applicable to the subject matter of this proceeding and believes that such statutes provide the Commission authority to approve the requested relief.

11. **Targeted Economic Development Project.** Petitioner requests that the Commission establish a subdocket to address approval of the proposed River Ridge Commerce Center Project as a targeted economic development project ("TED"), as detailed in the prefiled case-in-chief testimony and exhibits of Ms. Erin Schneider, which would constitute Petitioner's case-in-chief testimony for the TED subdocket. Petitioner considers the provisions of the Public Service Commission Act, as amended, including Ind. Code Ch. 8-1-39 among others, to be applicable to Petitioner's request for TED approval. Additionally, in accordance with General Administrative Order 2016-6 ("GAO 2016-6"), Petitioner is applying to the Indiana Economic Development Corporation ("IEDC") for approval to treat costs associated with the proposed TED project as TDSIC costs. In the past the IEDC has been supportive of TED projects in River Ridge. In addition, Petitioner requests the following procedural schedule related to the subdocket proceeding:

(i) November 23, 2021 – Duke Energy Indiana files its case-in-chief testimony;

(ii) January 25, 2022 – OUCC and Intervenors shall file their respective cases-in-chief;

(iii) January 31, 2022 – Duke Energy Indiana shall file its rebuttal testimony;

(iv) Week of February 14, 2022 – Evidentiary Hearing;

(v) While the Petitioner is entitled to issuance of an order within ninety (90) days, Petitioner is proposing a schedule that affords the Commission one hundred and twenty (120) days.

12. **Petitioner's Counsel**. Andrew J. Wells and Elizabeth A. Heneghan at 1000 East Main Street, Plainfield, Indiana 46168 are counsel for Petitioner in this matter and are duly authorized to accept service of papers in this Cause on behalf of Petitioner.

WHEREFORE, Duke Energy Indiana requests that the Commission promptly publish notice, make such investigation and hold such hearings as are necessary and advisable, and thereafter make and enter an order in this Cause:

(a) Finding that the projects contained in TDSIC 2.0 are "eligible transmission, distribution, and storage system improvements" within the meaning of Ind. Code § 8-1-39-2;

(b) Finding that Duke Energy Indiana has provided the best estimate of the costs of the eligible improvements included in TDSIC 2.0;

(c) Determining that the public convenience and necessity require or will require the eligible improvements included in TDSIC 2.0;

(d) Determine that the estimated costs of the eligible improvements included in TDSIC 2.0 are justified by incremental benefits attributable to TDSIC 2.0;

(e) Approving TDSIC 2.0 as reasonable and designating the eligible transmission, distribution and storage system improvements included in TDSIC 2.0 as TDSIC Costs eligible for Transmission, Distribution and Storage System Improvement Charge treatment in accordance with Ind. Code § 8-1-39-9;

(f) Approving the T&D Infrastructure Improvement Cost Rate Adjustment, Standard Contract Rider No. 65, for timely recovery of 80% of the 6-Year TDSIC 2.0 cost, and deferral with carrying costs of 20% of TDSIC 2.0 costs for recovery as part of Petitioner's next general base retail electric rate case filed with the Commission;

(g) Approving as a regulatory asset the deferred amounts;

(h) Approving Petitioner's proposed process for updating TDSIC 2.0 in future annual proceedings;

(i) Establishing a subdocket to address the River Ridge Commerce Center TED Project; and

(j) Granting to Petitioner such additional and further relief as may be deemed necessary or appropriate.

Dated as of the 23rd day of November, 2021.

Respectfully submitted,

DUKE ENERGY INDIANA, LLC

By: _____
Counsel for Duke Energy Indiana, LLC

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VERIFICATION

I, Stan C. Pinegar, hereby verify under the penalties of perjury that the foregoing Verified Petition is true and accurate to the best of my information, knowledge, and belief.

November 23, 2021
Date

Duke Energy Indiana, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was hand delivered or electronically delivered this 23rd day of November, 2021, to the following:

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In addition, copies have been distributed electronically, for informational purposes, to the following:

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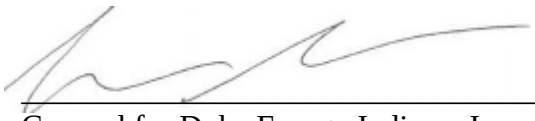
Dated this 23rd day of November 2021.

By: 
Counsel for Duke Energy Indiana, Inc.

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ATTACHMENT 1

Duke Energy Indiana - TDSIC 2.0 Infrastructure Improvement Plan

6 Year Summary

Distribution System Improvements

Line No.	Project Category	2023-2028 Capital Additions	2023-2028 O&M	2023-2028 Capital & O&M Total
1	Distribution System Circuit Improvements	$704,060,933	$108,273,358	$812,334,291
2	Distribution System Substation Improvements	$176,965,506	$41,837	$177,007,344
3	Total Distribution - Contingency	$155,475,254	$0	$155,475,254
4	**Total Distribution Improvements**	**$1,036,501,694**	**$108,315,195**	**$1,144,816,889**

Transmission System Improvements

5	Transmission System Line Improvements	$494,662,048	$22,610,931	$517,272,980
6	Transmission System Substation Improvements	$198,038,203	$0	$198,038,203
7	Total Transmission - Contingency	$122,241,221	$0	$122,241,221
8	**Total Transmission Improvements**	**$814,941,472**	**$22,610,931**	**$837,552,403**
9	**Total TDSIC 2.0 Improvements**	**$1,851,443,166**	**$130,926,126**	**$1,982,369,292**
10	Targeted Economic Development - Identified Projects	$44,143,497	$0	$44,143,497
11	Targeted Economic Development - Potential Transmission Improvements	$90,000,000	$0	$90,000,000
12	Total Targeted Economic Development - Contingency	$23,672,382	$0	$23,672,382
13	**Total Investment Plan**	**$2,009,259,044**	**$130,926,126**	**$2,140,185,171**

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Summary By Year

Distribution System Improvements

Line No.	Project Category	2023 Capital Additions	2023 O&M	2023 Capital & O&M Total		2024 Capital Additions	2024 O&M	2024 Capital & O&M Total	
1	**Distribution System Circuit Improvements - TDSIC 2.0**	$86,070,023	$17,975,406	$104,045,429		$95,838,470	$14,658,664	$110,497,134	
2	**Distribution System Substation Improvements - TDSIC 2.0**	$14,493,107	$41,837	$14,534,945		$18,052,441	$0	$18,052,441	
3	**Total Distribution - Contingency - TDSIC 2.0**	$17,746,435	$0	$17,746,435		$20,098,396	$0	$20,098,396	
4	**Total Distribution Improvements - TDSIC 2.0**	**$118,309,565**	**$18,017,244**	**$136,326,809**		**$133,989,307**	**$14,658,664**	**$148,647,971**	
5	**Cumulative Distribution Improvements - TDSIC 2.0**	**$118,309,565**	**$18,017,244**	**$136,326,809**		**$252,298,872**	**$32,675,908**	**$284,974,779**	
	Transmission System Improvements								
6	**Transmission System Line Improvements - TDSIC 2.0**	$35,900,449	$2,862,794	$38,763,243		$58,015,946	$2,661,355	$60,677,301	
7	**Transmission System Substation Improvements - TDSIC 2.0**	$26,046,227	$0	$26,046,227		$47,816,638	$0	$47,816,638	
8	**Total Transmission - Contingency - TDSIC 2.0**	$10,931,766	$0	$10,931,766		$18,676,338	$0	$18,676,338	
9	**Total Transmission Improvements - TDSIC 2.0**	**$72,878,442**	**$2,862,794**	**$75,741,236**		**$124,508,922**	**$2,661,355**	**$127,170,277**	
10	**Cumulative Transmission Improvements - TDSIC 2.0**	**$72,878,442**	**$2,862,794**	**$75,741,236**		**$197,387,364**	**$5,524,149**	**$202,911,513**	
11	**Total T & D Improvements - TDSIC 2.0**	**$191,188,007**	**$20,880,038**	**$212,068,044**		**$258,498,229**	**$17,320,019**	**$275,818,248**	
12	**Cumulative T & D Improvements - TDSIC 2.0**	**$191,188,007**	**$20,880,038**	**$212,068,044**		**$449,686,235**	**$38,200,057**	**$487,886,292**	

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Summary By Year

Distribution System Improvements

Line No.	Project Category	2025 Capital Additions	2025 O&M	2025 Capital & O&M Total		2026 Capital Additions	2026 O&M	2026 Capital & O&M Total	
1	**Distribution System Circuit Improvements - TDSIC 2.0**	$119,415,156	$16,548,331	$135,963,487		$126,131,284	$17,941,286	$144,072,570	
2	**Distribution System Substation Improvements - TDSIC 2.0**	$67,758,300	$0	$67,758,300		$40,531,401	$0	$40,531,401	
3	**Total Distribution - Contingency - TDSIC 2.0**	$33,030,610	$0	$33,030,610		$29,411,062	$0	$29,411,062	
4	**Total Distribution Improvements - TDSIC 2.0**	**$220,204,066**	**$16,548,331**	**$236,752,397**		**$196,073,747**	**$17,941,286**	**$214,015,033**	
5	**Cumulative Distribution Improvements - TDSIC 2.0**	**$472,502,938**	**$49,224,238**	**$521,727,176**		**$668,576,685**	**$67,165,525**	**$735,742,209**	
	Transmission System Improvements								
6	**Transmission System Line Improvements - TDSIC 2.0**	$141,075,955	$3,704,375	$144,780,330		$107,008,432	$3,097,939	$110,106,371	
7	**Transmission System Substation Improvements - TDSIC 2.0**	$19,402,294	$0	$19,402,294		$38,242,832	$0	$38,242,832	
8	**Total Transmission - Contingency - TDSIC 2.0**	$28,319,691	$0	$28,319,691		$25,632,576	$0	$25,632,576	
9	**Total Transmission Improvements - TDSIC 2.0**	**$188,797,941**	**$3,704,375**	**$192,502,315**		**$170,883,840**	**$3,097,939**	**$173,981,779**	
10	**Cumulative Transmission Improvements - TDSIC 2.0**	**$386,185,305**	**$9,228,524**	**$395,413,828**		**$557,069,144**	**$12,326,463**	**$569,395,607**	
11	**Total T & D Improvements - TDSIC 2.0**	**$409,002,007**	**$20,252,705**	**$429,254,712**		**$366,957,587**	**$21,039,225**	**$387,996,812**	
12	**Cumulative T & D Improvements - TDSIC 2.0**	**$858,688,242**	**$58,452,762**	**$917,141,004**		**$1,225,645,829**	**$79,491,987**	**$1,305,137,816**	

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Summary By Year

Distribution System Improvements

Line No.	Project Category	2027 Capital Additions	2027 O&M	2027 Capital & O&M Total		2028 Capital Additions	2028 O&M	2028 Capital & O&M Total	
1	**Distribution System Circuit Improvements - TDSIC 2.0**	$132,418,981	$19,685,394	$152,104,375		$144,187,021	$21,464,276	$165,651,297	
2	**Distribution System Substation Improvements - TDSIC 2.0**	$20,911,112	$0	$20,911,112		$15,219,145	$0	$15,219,145	
3	**Total Distribution - Contingency - TDSIC 2.0**	$27,058,252	$0	$27,058,252		$28,130,500	$0	$28,130,500	
4	**Total Distribution Improvements - TDSIC 2.0**	**$180,388,344**	**$19,685,394**	**$200,073,738**		**$187,536,665**	**$21,464,276**	**$209,000,941**	
5	**Cumulative Distribution Improvements - TDSIC 2.0**	**$848,965,029**	**$86,850,919**	**$935,815,948**		**$1,036,501,694**	**$108,315,195**	**$1,144,816,889**	
	Transmission System Improvements								
6	**Transmission System Line Improvements - TDSIC 2.0**	$85,638,312	$7,895,606	$93,533,918		$67,022,954	$2,388,862	$69,411,816	
7	**Transmission System Substation Improvements - TDSIC 2.0**	$26,363,501	$0	$26,363,501		$40,166,711	$0	$40,166,711	
8	**Total Transmission - Contingency - TDSIC 2.0**	$19,765,026	$0	$19,765,026		$18,915,823	$0	$18,915,823	
9	**Total Transmission Improvements - TDSIC 2.0**	**$131,766,839**	**$7,895,606**	**$139,662,445**		**$126,105,489**	**$2,388,862**	**$128,494,351**	
10	**Cumulative Transmission Improvements - TDSIC 2.0**	**$688,835,983**	**$20,222,069**	**$709,058,052**		**$814,941,472**	**$22,610,931**	**$837,552,403**	
11	**Total T & D Improvements - TDSIC 2.0**	**$312,155,183**	**$27,581,001**	**$339,736,183**		**$313,642,154**	**$23,853,138**	**$337,495,292**	
12	**Cumulative T & D Improvements - TDSIC 2.0**	**$1,537,801,012**	**$107,072,988**	**$1,644,874,000**		**$1,851,443,166**	**$130,926,126**	**$1,982,369,292**	

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Summary By Year

Distribution System Improvements

Line No.	Project Category	6 Year Capital Additions	6 Year O&M	6 Year Capital & O&M Total
1	**Distribution System Circuit Improvements - TDSIC 2.0**	$704,060,933	$108,273,358	$812,334,291
2	**Distribution System Substation Improvements - TDSIC 2.0**	$176,965,506	$41,837	$177,007,344
3	**Total Distribution - Contingency - TDSIC 2.0**	$155,475,254	$0	$155,475,254
4	**Total Distribution Improvements - TDSIC 2.0**	**$1,036,501,694**	**$108,315,195**	**$1,144,816,889**
5	**Cumulative Distribution Improvements - TDSIC 2.0**	**$1,036,501,694**	**$108,315,195**	**$1,144,816,889**
	Transmission System Improvements			
6	**Transmission System Line Improvements - TDSIC 2.0**	$494,662,048	$22,610,931	$517,272,980
7	**Transmission System Substation Improvements - TDSIC 2.0**	$198,038,203	$0	$198,038,203
8	**Total Transmission - Contingency - TDSIC 2.0**	$122,241,221	$0	$122,241,221
9	**Total Transmission Improvements - TDSIC 2.0**	**$814,941,472**	**$22,610,931**	**$837,552,403**
10	**Cumulative Transmission Improvements - TDSIC 2.0**	**$814,941,472**	**$22,610,931**	**$837,552,403**
11	**Total T & D Improvements - TDSIC 2.0**	**$1,851,443,166**	**$130,926,126**	**$1,982,369,292**
12	**Cumulative T & D Improvements - TDSIC 2.0**	**$1,851,443,166**	**$130,926,126**	**$1,982,369,292**

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	2023 Material	2023 Labor	2023 Indirects	2023 AFUDC	2023 Total Capital Additions	2023 O&M	2023 Capital and O&M	2023 Retirements	2023 Total Project
1	**Distribution System Circuit Improvements**	$21,611,814	$41,675,052	$20,455,932	$2,327,224	$86,070,023	$17,975,406	$104,045,429	$19,215,447	$123,260,876
2	**Distribution System Substation Improvements**	$4,985,306	$6,790,365	$2,101,254	$616,182	$14,493,107	$41,837	$14,534,945	$2,359,223	$16,894,168
3	**Total Distribution Improvements**	**$26,597,120**	**$48,465,418**	**$22,557,186**	**$2,943,406**	**$100,563,130**	**$18,017,244**	**$118,580,374**	**$21,574,670**	**$140,155,044**
	Transmission System Improvements									
4	**Transmission System Line Improvements**	$8,213,869	$20,891,917	$5,863,430	$931,233	$35,900,449	$2,862,794	$38,763,243	$3,429,486	$42,192,728
5	**Transmission System Substation Improvements**	$8,330,976	$13,440,251	$4,013,037	$1,217,027	$26,046,227	$0	$26,046,227	$2,866,589	$28,912,816
6	**Total Transmission Improvements**	**$16,544,845**	**$34,332,168**	**$9,876,467**	**$2,148,261**	**$61,946,675**	**$2,862,794**	**$64,809,469**	**$6,296,075**	**$71,105,544**
7	**Total T & D Improvements**	**$43,141,965**	**$82,797,586**	**$32,433,653**	**$5,091,666**	**$162,509,806**	**$20,880,038**	**$183,389,843**	**$27,870,745**	**$211,260,588**

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	2024 Material	2024 Labor	2024 Indirects	2024 AFUDC	2024 Total Capital Additions	2024 O&M	2024 Capital and O&M	2024 Retirements	2024 Total Project
1	**Distribution System Circuit Improvements**	$24,400,105	$46,786,550	$21,609,669	$3,042,146	$95,838,470	$14,658,664	$110,497,134	$20,983,652	$131,480,786
2	**Distribution System Substation Improvements**	$6,342,343	$8,096,259	$2,800,538	$813,300	$18,052,441	$0	$18,052,441	$981,149	$19,033,589
3	**Total Distribution Improvements**	**$30,742,449**	**$54,882,809**	**$24,410,206**	**$3,855,447**	**$113,890,911**	**$14,658,664**	**$128,549,575**	**$21,964,801**	**$150,514,375**
	Transmission System Improvements									
4	**Transmission System Line Improvements**	$12,371,231	$34,799,480	$9,247,730	$1,597,506	$58,015,946	$2,661,355	$60,677,301	$8,244,755	$68,922,056
5	**Transmission System Substation Improvements**	$17,216,557	$21,963,154	$6,958,181	$1,678,746	$47,816,638	$0	$47,816,638	$2,617,636	$50,434,273
6	**Total Transmission Improvements**	**$29,587,787**	**$56,762,634**	**$16,205,911**	**$3,276,252**	**$105,832,584**	**$2,661,355**	**$108,493,939**	**$10,862,391**	**$119,356,330**
7	**Total T & D Improvements**	**$60,330,236**	**$111,645,443**	**$40,616,117**	**$7,131,698**	**$219,723,494**	**$17,320,019**	**$237,043,513**	**$32,827,191**	**$269,870,705**

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Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	2025 Material	2025 Labor	2025 Indirects	2025 AFUDC	2025 Total Capital Additions	2025 O&M	2025 Capital and O&M	2025 Retirements	2025 Total Project
1	**Distribution System Circuit Improvements**	$31,931,771	$56,847,172	$27,049,867	$3,586,346	$119,415,156	$16,548,331	$135,963,487	$23,920,905	$159,884,392
2	**Distribution System Substation Improvements**	$20,670,588	$33,115,809	$10,887,924	$3,083,979	$67,758,300	$0	$67,758,300	$3,200,811	$70,959,112
3	**Total Distribution Improvements**	**$52,602,358**	**$89,962,981**	**$37,937,791**	**$6,670,325**	**$187,173,456**	**$16,548,331**	**$203,721,787**	**$27,121,716**	**$230,843,504**
	Transmission System Improvements									
4	**Transmission System Line Improvements**	$20,239,503	$92,369,757	$24,159,173	$4,307,522	$141,075,955	$3,704,375	$144,780,330	$12,387,550	$157,167,880
5	**Transmission System Substation Improvements**	$5,736,954	$9,878,242	$3,112,939	$674,160	$19,402,294	$0	$19,402,294	$1,125,311	$20,527,606
6	**Total Transmission Improvements**	**$25,976,457**	**$102,247,999**	**$27,272,111**	**$4,981,681**	**$160,478,250**	**$3,704,375**	**$164,182,624**	**$13,512,861**	**$177,695,485**
7	**Total T & D Improvements**	**$78,578,816**	**$192,210,981**	**$65,209,903**	**$11,652,007**	**$347,651,706**	**$20,252,705**	**$367,904,411**	**$40,634,578**	**$408,538,989**

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Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	2026 Material	2026 Labor	2026 Indirects	2026 AFUDC	2026 Total Capital Additions	2026 O&M	2026 Capital and O&M	2026 Retirements	2026 Total Project
1	**Distribution System Circuit Improvements**	$37,015,298	$54,287,933	$30,841,467	$3,986,586	$126,131,284	$17,941,286	$144,072,570	$27,899,702	$171,972,272
2	**Distribution System Substation Improvements**	$13,952,670	$19,131,397	$6,245,354	$1,201,980	$40,531,401	$0	$40,531,401	$1,825,252	$42,356,653
3	**Total Distribution Improvements**	**$50,967,968**	**$73,419,330**	**$37,086,821**	**$5,188,566**	**$166,662,685**	**$17,941,286**	**$184,603,971**	**$29,724,954**	**$214,328,925**
	Transmission System Improvements									
4	**Transmission System Line Improvements**	$6,750,653	$71,930,140	$24,892,902	$3,434,737	$107,008,432	$3,097,939	$110,106,371	$11,450,880	$121,557,252
5	**Transmission System Substation Improvements**	$13,960,263	$17,010,487	$5,943,877	$1,328,205	$38,242,832	$0	$38,242,832	$1,603,854	$39,846,686
6	**Total Transmission Improvements**	**$20,710,916**	**$88,940,627**	**$30,836,779**	**$4,762,942**	**$145,251,264**	**$3,097,939**	**$148,349,203**	**$13,054,734**	**$161,403,937**
7	**Total T & D Improvements**	**$71,678,884**	**$162,359,957**	**$67,923,600**	**$9,951,508**	**$311,913,949**	**$21,039,225**	**$332,953,174**	**$42,779,688**	**$375,732,862**

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Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	2027 Material	2027 Labor	2027 Indirects	2027 AFUDC	2027 Total Capital Additions	2027 O&M	2027 Capital and O&M	2027 Retirements	2027 Total Project
1	**Distribution System Circuit Improvements**	$35,559,859	$59,413,169	$33,126,208	$4,319,744	$132,418,981	$19,685,394	$152,104,375	$32,467,153	$184,571,528
2	**Distribution System Substation Improvements**	$6,462,560	$10,166,928	$3,323,352	$958,272	$20,911,112	$0	$20,911,112	$870,902	$21,782,014
3	**Total Distribution Improvements**	**$42,022,420**	**$69,580,097**	**$36,449,560**	**$5,278,016**	**$153,330,092**	**$19,685,394**	**$173,015,487**	**$33,338,055**	**$206,353,542**
	Transmission System Improvements									
4	**Transmission System Line Improvements**	$4,730,528	$57,755,763	$20,686,112	$2,465,910	$85,638,312	$7,895,606	$93,533,918	$9,561,994	$103,095,912
5	**Transmission System Substation Improvements**	$8,580,200	$13,055,961	$3,843,439	$883,902	$26,363,501	$0	$26,363,501	$1,622,803	$27,986,304
6	**Total Transmission Improvements**	**$13,310,727**	**$70,811,723**	**$24,529,551**	**$3,349,811**	**$112,001,813**	**$7,895,606**	**$119,897,419**	**$11,184,797**	**$131,082,217**
7	**Total T & D Improvements**	**$55,333,147**	**$140,391,820**	**$60,979,110**	**$8,627,828**	**$265,331,906**	**$27,581,001**	**$292,912,906**	**$44,522,852**	**$337,435,758**

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Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	2028 Material	2028 Labor	2028 Indirects	2028 AFUDC	2028 Total Capital Additions	2028 O&M	2028 Capital and O&M	2028 Retirements	2028 Total Project
1	**Distribution System Circuit Improvements**	$40,150,414	$63,168,349	$36,139,148	$4,729,110	$144,187,021	$21,464,276	$165,651,297	$35,573,960	$201,225,256
2	**Distribution System Substation Improvements**	$5,399,879	$7,109,073	$2,252,107	$458,085	$15,219,145	$0	$15,219,145	$761,310	$15,980,455
3	**Total Distribution Improvements**	**$45,550,293**	**$70,277,422**	**$38,391,255**	**$5,187,195**	**$159,406,165**	**$21,464,276**	**$180,870,441**	**$36,335,270**	**$217,205,711**
	Transmission System Improvements									
4	**Transmission System Line Improvements**	$1,225,822	$47,830,418	$16,235,784	$1,730,930	$67,022,954	$2,388,862	$66,911,816	$6,575,512	$73,487,328
5	**Transmission System Substation Improvements**	$13,555,397	$19,169,042	$6,032,246	$1,410,027	$40,166,711	$0	$40,166,711	$1,756,266	$41,922,978
6	**Total Transmission Improvements**	**$14,781,219**	**$66,999,460**	**$22,268,030**	**$3,140,957**	**$107,189,665**	**$2,388,862**	**$109,578,528**	**$8,331,778**	**$117,910,306**
7	**Total T & D Improvements**	**$60,331,512**	**$137,276,881**	**$60,659,285**	**$8,328,152**	**$266,595,831**	**$23,853,138**	**$290,448,969**	**$44,667,048**	**$335,116,017**

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Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	6 Year Total Material	6 Year Total Labor	6 Year Total Indirects	6 Year Total AFUDC	6 Year Total Capital Additions	6 Year Total O&M	6 Year Total Capital and O&M	6 Year Total Retirements	6 Year Total Project
1	**Distribution System Circuit Improvements**	$190,669,261	$322,178,225	$169,222,291	$21,991,157	$704,060,933	$108,273,358	$812,334,291	$160,060,819	$972,395,110
2	**Distribution System Substation Improvements**	$57,813,347	$84,409,831	$27,610,529	$7,131,799	$176,965,506	$41,837	$177,007,344	$9,998,648	$187,005,992
3	**Total Distribution Improvements**	**$248,482,608**	**$406,588,056**	**$196,832,819**	**$29,122,956**	**$881,026,440**	**$108,315,195**	**$989,341,635**	**$170,059,466**	**$1,159,401,101**
	Transmission System Improvements									
4	**Transmission System Line Improvements**	$53,531,606	$325,577,475	$101,085,130	$14,467,837	$494,662,048	$22,610,931	$517,272,980	$51,650,177	$566,423,156
5	**Transmission System Substation Improvements**	$67,380,346	$94,517,136	$29,903,718	$7,192,067	$198,038,203	$0	$198,038,203	$11,592,460	$209,630,662
6	**Total Transmission Improvements**	**$120,911,952**	**$420,094,611**	**$130,988,849**	**$21,659,904**	**$692,700,251**	**$22,610,931**	**$715,311,182**	**$63,242,636**	**$776,053,819**
7	**Total T & D Improvements**	**$369,394,560**	**$826,682,667**	**$327,821,668**	**$50,782,860**	**$1,573,726,691**	**$130,926,126**	**$1,704,652,817**	**$233,302,103**	**$1,935,454,920**

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: 
Stan C. Pinegar

Dated: November 23, 2021