

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

**PETITION OF INDIANA UTILITIES CORPORATION )  
INC. FOR (1) AUTHORITY TO INCREASE ITS )  
RATES AND CHARGES FOR GAS UTILITY )  
SERVICE, AND (2) APPROVAL OF NEW )  
SCHEDULES OF RATES AND CHARGES. )**

**CAUSE NO. 46086**

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S**

**PUBLIC'S EXHIBIT NO. 1 – TESTIMONY OF OUCC WITNESS  
MOHAB M. NOURELDIN**

**September 19, 2024**

Respectfully submitted,

Indiana Office of Utility Consumer Counselor



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**INDIANA UTILITIES CORPORATION, INC.  
CAUSE NO. 46086  
TESTIMONY OF OUCC WITNESS MOHAB M. NOURELDIN**

**I. INTRODUCTION**

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

2 A: My name is Mohab M. Noureldin, and my business address is 115 West  
3 Washington Street, Suite 1500 South, Indianapolis, Indiana 46204.

4 **Q: By whom are you employed and in what capacity?**

5 A: I am employed by the Indiana Office of Utility Consumer Counselor (“OUCC”) as  
6 a Utility Analyst with the Natural Gas Division. I have worked in my current role  
7 since December 2021. For a summary of my educational and professional  
8 experience, as well as my preparation for this case, please see Appendix MMN-1  
9 attached to my testimony.

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

11 A: The purpose of my testimony is to explain my analysis and recommendations  
12 regarding Indiana Utilities Corporation, Inc.’s (“Petitioner,” or “Indiana Utilities”)   
13 request for a rate increase. I sponsor and discuss the OUCC’s recommendations  
14 regarding Indiana Utilities’ revenue requirements, revenue adjustments, state and  
15 federal income taxes, and excess accumulated deferred income taxes (“EADIT”).

16 I also sponsor accounting schedules to support the OUCC’s recommended  
17 pro forma adjustments. In addition to the pro forma adjustments I recommend, the  
18 accounting schedules incorporate pro forma adjustments and recommendations of  
19 other OUCC witnesses. These schedules also incorporate a cost of equity Indiana  
20 Utilities and the OUCC agreed to in the Partial Settlement Agreement included with

1 Indiana Utilities' testimony of Frank Czeschin as Petitioner's Exhibit No. 1,  
2 Attachment FC-2. The accounting schedules I prepared incorporate all adjustments  
3 used to calculate the OUCC's recommended total pro forma revenue requirements  
4 and the resulting recommended rate increase for Indiana Utilities. The OUCC's  
5 Index of Issues is attached to my testimony as Appendix MMN-2.

6 Overall, my analysis and those of the OUCC's additional witnesses in this  
7 case show that an increase is warranted at a slightly lower level than requested by  
8 Petitioner.

9 **Q: What significant factors contribute to Indiana Utilities' proposed rate**  
10 **increase?**

11 A: The primary drivers of Indiana Utilities' proposed rate increase are the loss of a  
12 large customer, an increase to expenses across the board, and an increase in rate  
13 base. The total revenue removed from the case for this large customer is \$252,383.  
14 As evidenced by Petitioner's Exhibit No. 3, Revised Attachment SAS-1, Indiana  
15 Utilities has experienced a significant increase in many of its operating expenses,  
16 as well as a significant increase to its rate base since its last rate case.

17 **Q: Do you address other issues in this Cause?**

18 A: Yes. I discuss the Indiana General Assembly's policy recognizing utility service  
19 affordability through Ind. Code § 8-1-2-0.5 as it relates to this Cause.

20 **Q: What are your recommendations in this Cause?**

21 A: I recommend a slight reduction in Indiana Utilities' proposed rate increase. I further  
22 recommend the Commission approve only necessary and reasonable requests for  
23 Indiana Utilities' provision of quality gas service at reasonable prices and take steps  
24 to moderate rate increases over time.

1 **Q: If your testimony does not address a specific topic, issue, or item, should it be**  
2 **construed to mean you agree with Petitioner's proposal?**

3 A: No. My silence on any issue should not be construed as an endorsement. Also, my  
4 silence in response to any actions or adjustments stated or implied by Indiana  
5 Utilities should not be construed as an endorsement.

## II. OUCC WITNESS INTRODUCTION

6 **Q: Please introduce the additional OUCC witnesses who are testifying in this case.**

7 A: The following OUCC witnesses reviewed and analyzed Indiana Utilities' case-in-  
8 chief and are testifying on the following elements of this rate case:

9 **Mr. Zachary Leinheiser** discusses various operation and maintenance expenses,  
10 the Indiana Utility Regulatory Commission ("Commission" or "IURC") fee and  
11 taxes other than income taxes. He recommends adjustments to rate case expense,  
12 bad debt expense, energy efficiency rebates, payroll expense, retirement expense,  
13 property insurance expense, health insurance expense, IURC fees, miscellaneous  
14 administrative and general expense, severance pay, and payroll taxes. **(Public's**  
15 **Exhibit No. 2.)**

16 **Mr. Jason Kohlmann** discusses Indiana Utilities' original cost rate base, capital  
17 structure, depreciation expense, and property tax expense. He recommends changes  
18 to Indiana Utilities' rate base, depreciation expense, property tax expense, and the  
19 synchronized interest calculation based on Indiana Utilities' capital structure.  
20 **(Public's Exhibit No. 3.)**

21 **Mr. Jared Hoff** discusses Indiana Utilities' rate design, tariff language changes,  
22 non-recurring charges, customer charges, and NTA calculation. Mr. Hoff  
23 recommends the removal of projected customers and consumption for the  
24 Lanesville expansion area and Tyson Foods from the revenue proof. He  
25 recommends an increase in revenue due to Indiana Utilities incorrectly applying its  
26 current tariff rates, and approval of changes to Petitioner's miscellaneous tariff  
27 charges. He recommends the Commission require a cost of service study be  
28 performed in the next rate case, and approval of Indiana Utilities' proposed change  
29 of method in the Normal Temperature Adjustment calculation. Mr. Hoff also  
30 recommends the customer charges be held at their current levels for customers in  
31 all rate classes. **(Public's Exhibit No. 4.)**

**III. REVENUE REQUIREMENT SCHEDULES**

1 **Q: Does the OUCC agree with Indiana Utilities' proposed pro forma increase in**  
2 **revenue from existing rates?**

3 A: No. As calculated using the figures originally presented in Indiana Utilities' Pro  
4 Forma Net Operating Income Statement, Indiana Utilities requested to increase its  
5 annual revenue by \$1,093,408. (Petitioner's Exhibit No. 4, Attachment BJM-1,  
6 Exhibit C.) In Indiana Utilities' revisions filed on August 27, 2024, it proposes a  
7 rate increase of \$1,046,693. (Attachment MMN-1, Schedule 1, page 1.) The  
8 OUCC's analysis shows Petitioner has justified a \$1,039,557 increase in Indiana  
9 Utilities' pro forma revenue requirement. (Attachment MMN-1, Schedule 1, page  
10 1.)

11 **Q: Were there any issues with how Petitioner's witness Bonnie Mann calculated**  
12 **the percentage increase on Petitioner's Exhibit No. 4, Attachment BJM-1,**  
13 **Schedule C-3?**

14 A: Yes. Petitioner's Exhibit No. 4, Revised Attachment BJM-1, Schedule C-3,  
15 attached to the testimony of Indiana Utilities' witness Ms. Mann, presents an  
16 increase of 24.51%. The percentage increase is based on an estimated volume of  
17 gas purchased multiplied by Indiana Utilities' estimated base cost of gas, resulting  
18 in an estimated total revenue. The percentage increase should be based on actual  
19 pro forma present rate revenues and gas costs, as adjusted from Indiana Utilities'  
20 actual test year revenues and gas costs. The difference in the denominator from  
21 estimated revenue Indiana Utilities used and actual pro forma revenue the OUCC  
22 used accounts for the different percentage increases shown in my Attachment  
23 MMN-1, Schedule 1. For calculation of the percentage increase in rates over  
24 Indiana Utilities' pro forma present rate revenue using Indiana Utilities' actual test

1 year gas cost revenue rather than Indiana Utilities' estimated future gas cost  
2 revenue, gives an accurate representation of the requested increase.

3 **Q: Are there other inconsistencies in Indiana Utilities' case-in-chief?**

4 A: Yes. The Petition originally filed in this case indicates an accounting test year of  
5 September 30, 2024, as adjusted for fixed, known and measurable changes  
6 occurring within 12 months following such test year. Indiana Utilities also  
7 requested the use of a September 30, 2024 cutoff date for its utility plant in service  
8 for purposes of valuing its rate base in this Cause. (Petitioner's Exhibit No. 1,  
9 Attachment FC-1, pages 2-3, item #2.) The OUCC sent discovery asking for  
10 clarification regarding both dates. In response, Indiana Utilities indicated the test  
11 year and cutoff for rate base should be the twelve months ending September 30,  
12 2023. (Attachment MMN-2, page 1; Indiana Utilities' Response to OUCC Data  
13 Request ("DR") 2-5.)

14 The Presiding Officers also issued a docket entry on August 2, 2024  
15 requesting confirmation of the test year and rate base cut-off. Indiana Utilities  
16 amended its Petition on August 9, 2024 to correct the test year and rate base cut-off  
17 dates to September 30, 2023.

18 Additionally, the Petition states Indiana Utilities requests an adjustment to  
19 its base rates and charges to increase its revenue by approximately \$1,129,288, or  
20 18.41% including gas costs. (Petitioner's Exhibit No. 1, Attachment FC-1, page 3,  
21 item #7.) This amount does not match Petitioner's Exhibit No. 4, Attachment BJM-  
22 1, Exhibit C, which shows an increase to revenue of \$1,093,408. The OUCC sent  
23 discovery on this item, asking where the \$1,129,288 could be found. In response,

1 Indiana Utilities indicated the amount should tie to Petitioner's Exhibit No. 4,  
2 Attachment BJM-2, Schedule 1, which indicates a total revenue increase in column  
3 (7) as \$1,129,228. (Attachment MMN-2, page 2; Indiana Utilities' Response to  
4 OUCC DR 3-13.) However, the amount referenced in the discovery response still  
5 does not match to Petitioner's revenue requirement schedules as indicated above.

6 OUCC Witness Hoff further discusses this discrepancy.

7 **Q: What attachments and schedules do you sponsor showing the pertinent**  
8 **calculations related to your testimony?**

9 A: I sponsor the following attachments and schedules:

10 Attachment MMN-1: OUCC Revenue Requirement Schedules;

11 • Schedule 1: Comparison of Petitioner's and the OUCC's Revenue  
12 Requirements, Gross Revenue Conversion Factor, and Comparison of the  
13 Net Operating Income Statement Adjustments.

14 • Schedule 2: Indiana Utilities' Balance Sheet.

15 • Schedule 3: Indiana Utilities' Income Statement.

16 • Schedule 4: OUCC's Pro Forma Net Operating Income Statement.

17 • Schedule 5: OUCC's Pro Forma Revenue Adjustments.

18 • Schedule 6: OUCC's Pro Forma Expense Adjustments.

19 • Schedule 7: OUCC's Pro Forma Rate Base through September 30, 2023.

20 • Schedule 8: OUCC's Pro Forma Capital Structure as of September 30,  
21 2023.

22 • Schedule 9: Current and Proposed Monthly Service Charges.

23 Attachment MMN-2: Responses to OUCC DRs regarding rate base and projected  
24 revenue;

25 Attachment MMN-3: Response to OUCC DR regarding Indiana Utilities'  
26 calculation of weather normalization revenue;

1 Attachment MMN-4: Responses to OUCC DRs regarding Indiana Utilities'  
2 increased revenue for additional customers;

3 Attachment MMN-5: Response to OUCC DR regarding Indiana Utilities' decrease  
4 in operating revenue related to change in tariffs;

5 Attachment MMN-6: Response to OUCC DR regarding Indiana Utilities' other gas  
6 revenue; and

7 Attachment MMN-7: Response to OUCC DR regarding EADIT.

8 **Q: Please describe the schedules in Attachment MMN-1.**

9 A: The purpose of each schedule in Attachment MMN-1 is described below:

- 10 • Schedule 1, page 1 summarizes the main components of the revenue  
11 requirements, incorporating the OUCC's adjustments to Indiana Utilities'  
12 proposed revenue requirements, resulting in the OUCC's recommended  
13 revenue requirement. Page 2 of Schedule 1 compares each party's revenue  
14 conversion factor calculation and includes a calculation to gross up bad  
15 debt, IURC fees, and taxes based on the OUCC's proposed revenue  
16 increase. Page 3 of Schedule 1 compares Indiana Utilities' and the OUCC's  
17 proposed operating income adjustments at present rates.
- 18 • Schedule 2 is Indiana Utilities' balance sheet for the test year ending  
19 September 30, 2023.
- 20 • Schedule 3 is Indiana Utilities' income statement for the test year ending  
21 September 30, 2023.
- 22 • Schedule 4 is the Pro Forma Net Operating Income Statement reflecting a  
23 summary of all pro forma revenue and expense adjustments the OUCC  
24 proposes. The OUCC's proposed adjustments yield revised pro forma  
25 revenue, operating expenses, and net operating income, resulting in a  
26 revised proposed rate adjustment.
- 27 • Schedule 5 shows the OUCC's adjustments to Indiana Utilities' proposed  
28 revenues.
- 29 • Schedule 6 shows the OUCC's adjustments to Indiana Utilities' proposed  
30 expenses, including pro forma present rate taxes other than income taxes,  
31 and pro forma present rate federal and state income taxes.
- 32 • Schedule 7 shows the OUCC's calculation of Indiana Utilities' original cost  
33 rate base through September 30, 2023.



- 1           • Schedule 8 reflects the OUCC's calculation of Indiana Utilities' capital  
2           structure as of September 30, 2023, including the cost of equity agreed to in  
3           the Partial Settlement Agreement between Indiana Utilities and the OUCC.
  
- 4           • Schedule 9 shows a comparison of Indiana Utilities' current monthly  
5           service charges and the proposed monthly service charges.

#### IV.     AFFORDABILITY

6     **Q:     Should affordability be taken into account as the Commission considers**  
7     **Indiana Utilities' proposal?**

8     A:     Yes. Through I.C. § 8-1-2-0.5, the Indiana General Assembly declared it to be the  
9     State's policy to recognize the importance of utility service affordability for present  
10    and future generations.<sup>1</sup> This statute states affordability should be protected as  
11    utilities invest in infrastructure necessary for system operation and maintenance.

12           Increased utility costs and investments continue to place upward pressure  
13    on customers' bills. It is imperative the Commission carefully scrutinize utility  
14    requests to approve only what is justified as reasonably necessary, at prudent costs,  
15    and at a level of service quality that provides a reasonable value to customers. It is  
16    also critical to factor customer affordability into the accounting treatment a utility  
17    seeks when prioritizing projects and expenses, and in the timing of rate increases  
18    and project requests.

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<sup>1</sup> **I.C. § 8-1-2-0.5 Operation and maintenance; affordability of utility services (Indiana State policy to promote utility investment in infrastructure while protecting affordability of utility service).**  
Sec. 0.5. The general assembly declares that it is the continuing policy of the state, in cooperation with local governments and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to create and maintain conditions under which utilities plan for and invest in infrastructure necessary for operation and maintenance while protecting the affordability of utility services for present and future generations of Indiana citizens.

1 **Q: How does affordability apply to Indiana Utilities' current rate request?**

2 A: Indiana Utilities received approval for an annual base rate revenue increase of  
3 \$675,418 in February 2019 in Cause No. 45116 and is now requesting an additional  
4 \$1,046,693, or 23.50%, annual base rate revenue increase in 2024. (Attachment  
5 MMN-1, Schedule 1, page 1.) Indiana Utilities' previously-approved net utility  
6 plant in service in Cause No. 45116 was \$7,273,058 as of June 30, 2018. In this  
7 case, Indiana Utilities' proposed net utility plant in service totals \$9,899,408 as of  
8 September 30, 2023. (Attachment MMN-1, Schedule 7.) Over 5.25 years, Indiana  
9 Utilities has increased its infrastructure by \$2.4 million, or 32.91% above the total  
10 in 2018, an average increase of approximately 6.27% per year.

11 **Q: How should affordability be considered?**

12 A: In light of the Indiana General Assembly's stated policy and directives,  
13 affordability should be a constant consideration for all Indiana jurisdictional  
14 utilities, as well as the Commission as it deliberates and makes decisions. (I.C. § 8-  
15 1-2-0.5.) While federal pipeline safety regulations have increased on transmission  
16 and distribution systems in the last decade, affordability is an issue that should be  
17 considered in all investment decisions to provide guidance and help set spending  
18 parameters.

19 **Q: Should affordability be considered within the context of system reliability and  
20 resilience?**

21 A: Absolutely. The OUCC understands the State's critical need to have financially  
22 sound utilities that provide safe, reliable, and resilient service through well-  
23 maintained transmission and distribution systems. However, at the same time  
24 customers are faced with increasing utility costs, they must also contend with rising

1 costs for housing and other necessities. To protect affordability, it is crucial to apply  
2 traditional ratemaking principles to ensure a utility's costs and returns are not  
3 forcing customers to pay for unreasonable expenses, imprudent investments, or  
4 excessive returns through higher rates.

5 The total increase requested by Indiana Utilities and the OUCC's  
6 recommendations are not far apart in this case. The OUCC's due diligence confirms  
7 that most of Indiana Utilities' proposal is necessary for continued safety, reliability,  
8 and resilience.

#### V. PROPOSED ADJUSTMENTS TO REVENUE REQUIREMENTS

9 **Q: Are you sponsoring all adjustments shown on Schedule 4 of Attachment**  
10 **MMN-1?**

11 A: No. Schedule 4 reflects all the OUCC's operating income and expense adjustments.

12 I am sponsoring adjustments to revenue, state income tax, and federal income tax.

13 Details of my proposed adjustments are shown on Schedules 5 and 6. Other

14 operating income and expense adjustments on Schedule 4 reflect the net result of

15 adjustments sponsored by OUCC witnesses Zachary Leinheiser, Jason Kohlmann,

16 and Jared Hoff. The details of Mr. Leinheiser's adjustments are shown on Public's

17 Exhibit No. 2, Attachments ZDL-1-11. The details of Mr. Kohlmann's adjustments

18 are shown on Public's Exhibit No. 3, Attachments JDK-1-4. The details of Mr.

19 Hoff's adjustments are shown on Public's Exhibit No. 4, Attachment JJH-7.

20 **Q: Are there adjustments included in Indiana Utilities' proposed revenue**  
21 **requirements the OUCC does not dispute?**

22 A: Yes. The OUCC is not disputing some of Indiana Utilities' proposed adjustments

23 to revenue and expenses. In the schedule reference column of Attachment MMN-

1 1, Schedule 4, a designation of "Pet." indicates the OUCC does not dispute the  
2 adjustment Indiana Utilities proposed. Likewise, in the schedule reference column  
3 of Attachment MMN-1, Schedule 4, adjustments OUCC witnesses sponsored show  
4 a schedule reference for Schedule 5 or Schedule 6, contained within Attachment  
5 MMN-1.

## VI. REVENUE ADJUSTMENTS

### A. Weather Normalization

6 **Q: What weather normalization revenue adjustment does Indiana Utilities**  
7 **propose?**

8 A: Indiana Utilities witness Mann proposed a \$27,213 increase to weather  
9 normalization revenue in the original filing. (Petitioner's Exhibit No. 4, Attachment  
10 BJM-1, Schedule C-1, page 1, Adjustment (1)(b).) However, in the revisions filed  
11 on August 27, 2024, Indiana Utilities updated its proposed increase to weather  
12 normalization revenue to \$28,308. (Petitioner's Exhibit No. 4, Revised Attachment  
13 BJM-1, Schedule C-1, page 1, Adjustment (1)(b).)

14 **Q: Do you agree with Indiana Utilities' proposed adjustment to weather**  
15 **normalization revenue?**

16 A: I do not agree with the original \$27,213 increase to weather normalization revenue.  
17 The OUCC inquired about an error in Indiana Utilities' original calculation in  
18 discovery. Indiana Utilities' response to OUCC discovery confirmed that Indiana  
19 Utilities had an error in its formulas within the weather normalization workpapers.  
20 (Attachment MMN-3, page 1; Indiana Utilities' Response to OUCC DR 7-9.) In  
21 response to the discovery, Indiana Utilities provided an updated workpaper

1 recalculating the weather normalization revenue using the correct formulas. It also  
2 included the correct amount of revenue in its revisions filed on August 27, 2024,  
3 on Petitioner's Exhibit No. 4, Revised Attachment BJM-1, Schedule C-1, page 1,  
4 adjustment 1(b).

5 **Q: What is your recommendation?**

6 A: I agree with Indiana Utilities' proposed \$28,308 increase to weather normalization  
7 revenue, as shown in the revisions filed on August 27, 2024.

**B. Additional Customers Added from Expansion Area**

8 **Q: What revenue adjustment does Indiana Utilities propose for additional**  
9 **customers added from an expansion area?**

10 A: Indiana Utilities witness Ms. Mann proposed a \$218,346 increase to operating  
11 revenue in the original filing for additional customers added from an expansion  
12 area. (Petitioner's Exhibit No. 4, Attachment BJM-1, Schedule C-1, page 1,  
13 Adjustment (1)(b).) However, in the revisions filed on August 27, 2024, Indiana  
14 Utilities updated its increase to operating revenue for additional customers added  
15 from an expansion area to \$218,132. (Petitioner's Exhibit No. 4, Revised  
16 Attachment BJM-1, Schedule C-1, page 1, Adjustment (1)(b).)

17 **Q: Do you agree with Indiana Utilities' proposed adjustment to revenue for**  
18 **additional customers added from an expansion area?**

19 A: No. Ms. Mann states in testimony:

20 This revenue is the expected total revenue for that expansion after it  
21 is completed and all customers hooked-up which could take as long  
22 as 6 years but the Petitioner is adding all the revenues in this  
23 proceeding. To the extent there are other adjustments that are made  
24 which may be questionable this adjustment should be offset.

25 (Petitioner's Exhibit No. 4, page 4, line 20 to page 5, line 2.)

1 The OUCC asked Indiana Utilities what it meant by “other adjustments that are  
2 made which may be questionable” in discovery. In response, Indiana Utilities  
3 indicated:

4 Petitioner’s adjustment would normally only include the change in  
5 customers for 12 months after the end of the test year. Petitioner  
6 chose to include the total amount which will not be achieved until  
7 more than six years after the end of the test year. To the extent the  
8 OUCC or any other party to the proceeding wish to introduce,  
9 change, or adjust expenses that would lower the rate increase,  
10 Petitioner reminds the parties that this revenue adjustment could and  
11 should be adjusted downward to 12 months following the test year.

12 (Attachment MMN-4, page 1; Indiana Utilities’ Response to OUCC  
13 DR 3-16.)

14 Indiana Utilities’ response to this OUCC discovery implies it is the OUCC’s job to  
15 remove this adjustment if there are other changes to expenses that would lower the  
16 rate increase. However, in Indiana Utilities’ revised Petition, it states the following:

17 Petitioner requests authority to change its current base rates,  
18 charges, tariffs, rules, and regulations as supported by the evidence  
19 of record in this cause; based on an accounting test year of  
20 September 30, 2023; as adjusted for fixed, known, and measurable  
21 changes occurring within 12 months following such test year.

22 (Petitioner’s Exhibit No. 1, Revised Attachment FC-1, pages 2-3,  
23 item #6.)

24 Therefore, Indiana Utilities should not have included this revenue.

25 The OUCC further asked Indiana Utilities in discovery when each customer  
26 included in the expansion revenue would receive service. In response, Indiana  
27 Utilities indicated the residential customers wouldn’t receive service until  
28 spring/summer of 2025. The small commercial customers wouldn’t receive service  
29 until fall of 2025. Lanesville School would receive service, at the earliest, during

1 the summer of 2026. Construction for the lines to St. John's School would start in  
2 2026, and Moag Glass would receive service in fall of 2025. (Attachment MMN-4,  
3 page 2-3; Indiana Utilities Response to OUCC DR 6-5.)

4 **Q: Did the Presiding Officers issue a docket entry specifying what adjustments**  
5 **should be included in this case?**

6 A: Yes. On August 15, 2024, the Presiding Officers issued a docket entry indicating  
7 the test year for determining Petitioner's actual and pro forma operating revenues,  
8 expenses and operating income under present and proposed rates shall be the 12  
9 months ended September 30, 2023, *adjusted for changes that are fixed, known and*  
10 *measurable for ratemaking purposes and that occur within 12 months following the*  
11 *end of the test year. (Emphasis added.)*

12 **Q: Did Indiana Utilities file revisions after the August 15, 2024 docket entry was**  
13 **issued?**

14 A: Yes. On August 27, 2024, Indiana Utilities filed revisions with the Commission  
15 that continued to include the revenue related to the customers added from an  
16 expansion area, that clearly do not fit the parameters of the docket entry language.  
17 As mentioned above, there are no customers that will be added to Indiana Utilities'  
18 system within twelve months following the end of the test year. Therefore, this  
19 revenue should not be included in Indiana Utilities' revenue requirements.

20 **Q: What is your recommendation for revenue related to customers added from**  
21 **an expansion area?**

22 A: Indiana Utilities included this revenue after the parameters of what adjustments  
23 could be included were specifically spelled out by the Commission in the docket  
24 entry. While it is Petitioner's responsibility to make sure the revenue and expenses  
25 included in this case are accurate and within the allowed time periods, the OUCC

1 is removing this revenue from the revenue requirement since it does not fall within  
2 12 months following the end of the test year. I have removed this revenue from  
3 Attachment MMN-1, Schedule 5.

### **C. Tariff Changes**

4 **Q: What adjustment does Indiana Utilities propose for tariff changes?**

5 A: Ms. Mann recommends a “[d]ecrease in revenue for the 30-day filing made in the  
6 first quarter of 2024 of (\$37,038).” (Petitioner’s Exhibit No. 4, page 5, lines 3-4.)  
7 This amount can be found on Petitioner’s Exhibit No. 4, Attachment BJM-1,  
8 Schedule C-1, page 1, Adjustment (1)(e).

9 **Q: Do you agree with Indiana Utilities’ proposed decrease in operating revenue**  
10 **due to tariff changes?**

11 A: No. First, the OUCC inquired about the adjustment calculation and methodology in  
12 discovery, as there was no indication what 30-day filing this revenue adjustment  
13 was for in Ms. Mann’s testimony. In response, Indiana Utilities provided a  
14 workpaper showing this adjustment is not for a 30-day filing, but instead a  
15 compliance filing to remove rate case expense from Cause No. 45116. (Attachment  
16 MMN-5, pages 1-3; Indiana Utilities Response to OUCC DR 7-10.) The OUCC  
17 agrees this revenue should be taken out of base rates.

18 Second, the removal of rate case expense was not the only adjustment to  
19 base rates during the twelve months following the end of the test year. Indiana  
20 Utilities also made a 30-day filing in TD 50704 to eliminate the Energy Efficiency  
21 Rider credit from Cause No. 43995 S1. As this was a credit to revenue that is no  
22 longer being returned to customers, this amount should be added to revenue in this



1 case. As part of the workpapers in TD 50704, Indiana Utilities provided a  
2 spreadsheet showing the credits returned to customers by month. (Attachment  
3 MMN-5, pages 4-5.) The amount of credits during the test year equals \$27,667.  
4 This amount should be netted against Indiana Utilities' tariff change adjustment.

5 **Q: What is your recommendation relating to tariff changes?**

6 A: Netting the \$37,038 decrease for the removal of rate case expense against the  
7 \$27,667 energy efficiency rider credit increase results in a \$9,371 decrease.  
8 (Attachment MMN-1, Schedule 5, adjustment 1(b).)

#### **D. Other Gas Revenues**

9 **Q: What adjustment does Indiana Utilities propose for other gas revenue?**

10 A: Indiana Utilities did not propose an adjustment for other gas revenues.

11 **Q: Do you agree no adjustment needs to be made for other gas revenues?**

12 A: No. Indiana Utilities' proposed tariff increases for reconnection charges from \$40  
13 to \$70, insufficient funds charges from \$15 to \$30 and a new \$10 charge back fee  
14 for electronic fund payments. (Petitioner's Exhibit No. 2, Attachment NA-2  
15 (Redline), page 21.) None of the additional revenue related to these increased tariff  
16 charges was included in Indiana Utilities' case-in-chief.

17 **Q: How did you calculate your other gas revenue adjustment?**

18 A: In discovery, the OUCC asked Indiana Utilities for the number of instances of  
19 reconnection charges, insufficient funds charges, and charge back fees for  
20 electronic funds payments over the last five fiscal years. (Attachment MMN-6,  
21 pages 2-3; Indiana Utilities' Response to OUCC DR 3-3.) The information  
22 provided showed a consistent number of charges over the last three years, so I used

1 a three-year average to calculate the number of instances. I multiplied the three-  
2 year average for each tariff change by the proposed increase in fees. (Attachment  
3 MMN-6, page 1.)

4 **Q: Did you make a corresponding expense adjustment for the increase in tariff**  
5 **charges?**

6 A: No. Petitioner is already incurring the increased expense for these items, so no  
7 adjustment to expenses needs to be made. OUCC Witness Hoff discusses the  
8 information provided by the utility to prove these charges are cost based.

9 **Q: What is your recommendation relating to other gas revenues?**

10 A: I recommend an increase to other gas revenue of \$1,210. (Attachment MMN-6,  
11 page 1.)

## VII. TAXES

12 **Q: Please discuss your conclusions for Indiana Utilities' adjustments to taxes.**

13 A: I do not dispute Indiana Utilities' methodology in calculating the pro forma federal  
14 and state income tax adjustments based on pro forma present rates. Attachment  
15 MMN-1, Schedule 6, page 3 includes calculations similar to Indiana Utilities'  
16 methodology to calculate state and federal income taxes. Changes to the state and  
17 federal income tax calculations on Schedule 6 are a result of changes in pro forma  
18 revenues and expenses sponsored by other OUCC witnesses, and a revised  
19 synchronized interest calculation as discussed by OUCC witness Kohlmann.

**VIII. EADIT**

1 **Q: Is Indiana Utilities required to provide a credit toward its revenue**  
2 **requirements to pass back EADIT to its customers due to the Tax Cuts and**  
3 **Jobs Act of 2017?**

4 A: Yes. On January 16, 2019, in the Commission's investigation into the impacts of  
5 the Tax Cuts and Jobs Act of 2017 under Cause No. 45032 S10, the Commission  
6 ordered Indiana Utilities to submit a compliance filing in Cause No. 45116  
7 identifying the amount of EADIT based on Respondent's last rate case and the  
8 amount of EADIT based on the additional rate base added in Cause No. 45116. *In*  
9 *re Commission Investigation*, Cause No. 45032 S10, Final Order p. 3, §4 (Ind. Util.  
10 Regul. Comm'n Jan. 16, 2019). On May 20, 2019, Indiana Utilities filed a  
11 compliance filing in Cause No. 45116, adjusting base rates to amortize \$431,483  
12 of EADIT over 12.13 years or 146 months as a refund to ratepayers. This is a  
13 required annual refund of \$35,572 to all customer classes. As a result, Indiana  
14 Utilities' current rates and charges include the appropriate refund of EADIT as  
15 ordered by the Commission.

16 **Q: Did Indiana Utilities make an adjustment to its revenue requirements in this**  
17 **proceeding to reflect a refund of EADIT to its customers in accordance with**  
18 **the Commission Order in Cause No. 45032 S10?**

19 A: No, Indiana Utilities did not make a pro forma adjustment to reflect an EADIT  
20 refund in its original filing. However, the OUCC inquired about an EADIT  
21 adjustment to the revenue requirements in discovery. Indiana Utilities' response to  
22 OUCC discovery confirmed Indiana Utilities did not include an adjustment in its  
23 revenue requirements schedules, and that it should be included in the schedules.  
24 (Attachment MMN-7, page 1; Indiana Utilities' Response to OUCC DR 7-12.)

1 **Q: Did Indiana Utilities include an adjustment to its revenue requirements in the**  
2 **revisions filed on August 27, 2024 to reflect a refund of EADIT to its**  
3 **customers?**

4 A: Yes. In the revisions filed on August 27, 2024, Indiana Utilities included the  
5 EADIT refund on Petitioner's Exhibit No. 4, Revised Attachment BJM-1, Schedule  
6 C-1, page 6, adjustment 6(c).

### **IX. RECOMMENDATIONS**

7 **Q: Please summarize your recommendations related to the revenue requirements**  
8 **and resulting revenue increase in this Cause.**

9 A: As shown on Schedule 1 of Attachment MMN-1, the OUCC's adjustments and  
10 corrections to Indiana Utilities' revenue, operating expenses, and taxes result in a  
11 recommended revenue increase of \$1,039,557. This represents a small reduction  
12 from Petitioner's request. The resulting pro forma proposed revenue should be  
13 allocated to the various customer rate classes on an across-the-board basis as  
14 discussed in the testimony of OUCC witness Hoff.

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

16 A: Yes.

**APPENDIX TO TESTIMONY OF**  
**OUCW WITNESS MOHAB M. NOURELDIN**

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

2 A: I graduated from the Modern Academy in Maadi - Cairo, Egypt Department of  
3 Business Administration with a Bachelor of Commerce in Accounting in August  
4 2005, and an Applied Management Principles Certification from Krannert School  
5 of Business Purdue University in May 2016. From August 2005 through July 2007,  
6 I worked for multiple companies in Egypt as an Accountant. From July 2007  
7 through January 2012, I worked for Mercedes-Benz Egypt (formerly Daimler-  
8 Chrysler Egypt) as an Accountant and was promoted to Senior Accountant before  
9 relocating to the United States in January 2012.

10 From March 2012 through June 2018, I worked for Purdue University in  
11 Physical Facilities Fiscal Affairs as a financial assistant / analyst. From August  
12 2018 through December 2021, I worked for Community Health System (Dukes  
13 Memorial Hospital / Bluffton Regional Medical Center), Ruoff Mortgage  
14 Company, and Aston Carter Staffing Agency as a Staff Accountant.

15 In December 2021, I began my employment with the OUCW as a Utility  
16 Analyst in the Natural Gas Division. My current responsibilities include reviewing  
17 and analyzing rate cases filed by Indiana natural gas utilities with the Commission.  
18 I also review Gas Cost Adjustment (“GCA”) cases, Pipeline Safety Adjustment  
19 (“PSA”) cases, Transmission, Distribution, and Storage System Improvement  
20 Charge (“TDSIC”), and Energy Efficiency (“EE”) tracker cases for natural gas  
21 utilities.

1                   While employed at the OUCC, I completed an Accounting and Ratemaking  
2                   course hosted by the Institute of Public Utilities at Michigan State University in  
3                   March of 2022.

4   **Q:   Have you previously testified before the Indiana Utility Regulatory**  
5   **Commission?**

6   A:   Yes. I have testified in GCA cases, rate cases, TDSIC tracker cases, PSA cases, and  
7           EE cases involving gas utilities.

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

10  A:   I analyzed Indiana Utilities' testimony, exhibits, revised testimony, revised  
11           exhibits, and supporting documentation submitted in this Cause. I analyzed Indiana  
12           Utilities' responses to OUCC discovery requests along with other supporting  
13           documentation Indiana Utilities provided. I reviewed the Commission's Final  
14           Order in Indiana Utilities' last rate case, Cause No. 45116.

**Indiana Office of Utility Consumer Counselor**  
**Cause No. 46086**  
**Index of Issues, Requests, and Supporting Witnesses<sup>1</sup>**

Subject	GENERAL	Supporting Witness
Test Year	Twelve Months Ended September 30, 2023	Public's Exhibit No. 1: Attachment MMN-1
Rate Base Cut-Off Date	September 30, 2023	Public's Exhibit No. 1: Attachment MMN-1

REVENUE REQUIREMENT			
Subject	OUCC Request	Supporting Witness	Workpaper or Exhibit Reference
Overall Revenue Increase/(Decrease)	<ul style="list-style-type: none"> <li>• Total annual increase in revenue of approximately \$1,039,557, or 24.31% net of gas costs</li> </ul>	<ul style="list-style-type: none"> <li>• Mohab Nouredin</li> </ul>	<ul style="list-style-type: none"> <li>• Public's Exhibit No. 1, Attachment MMN-1</li> </ul>
Pro Forma Income Statement and Net Operating Income	<ul style="list-style-type: none"> <li>• Set rates based on the OUCC's adjustments to Petitioner's Test Year income statement</li> <li>• Reflect revenues and O&amp;M in rates</li> </ul>	<ul style="list-style-type: none"> <li>• Mohab Nouredin (Revenues, State and Federal Income Taxes, EADIT)</li> <li>• Jared Hoff (Revenues)</li> <li>• Zachary Leinheiser (O&amp;M Expenses, Taxes Other than Income Taxes)</li> <li>• Jason Kohlmann (Depreciation Expense, Property Tax Expense)</li> </ul>	<ul style="list-style-type: none"> <li>• Public's Exhibit No. 1, Attachments MMN-1 to MMN-7</li> <li>• Public's Exhibit No. 4, Attachment JHH-7</li> <li>• Public's Exhibit No. 2, Attachments ZDL-1 to ZDL-11</li> <li>• Public's Exhibit No. 3, Attachments JDK-1 to JDK-2</li> </ul>
Return on Equity (ROE)	<ul style="list-style-type: none"> <li>• Authorize 10.10% ROE as proposed in Partial Settlement</li> </ul>	<ul style="list-style-type: none"> <li>• Mohab Nouredin</li> <li>• Jason Kohlmann</li> </ul>	<ul style="list-style-type: none"> <li>• Public's Exhibit No. 1, Attachment MMN-1</li> <li>• Public's Exhibit No. 3, Attachment JDK-4</li> </ul>

<sup>1</sup> This Index of the OUCC's case-in-chief is intended to highlight issues and is *not an exhaustive list* of the OUCC's requests in this proceeding. A complete account of the OUCC's requested relief can be found in the OUCC's case-in-chief, including but not limited to, its testimony and attachments.

<b>REVENUE REQUIREMENT</b>			
<b>Subject</b>	<b>OUCR Request</b>	<b>Supporting Witness</b>	<b>Workpaper or Exhibit Reference</b>
Weighted Average Cost of Capital (WACC)	<ul style="list-style-type: none"> <li>• Authorize WACC of 8.71% applied to original cost rate base</li> </ul>	<ul style="list-style-type: none"> <li>• Mohab Nouredin</li> <li>• Jason Kohlmann</li> </ul>	<ul style="list-style-type: none"> <li>• Public's Exhibit No. 1, Attachment MMN-1</li> <li>• Public's Exhibit No. 3, Attachment JDK-4</li> </ul>
Rate Base	<ul style="list-style-type: none"> <li>• Original Cost Rate Base</li> </ul>	<ul style="list-style-type: none"> <li>• Mohab Nouredin</li> <li>• Jason Kohlmann</li> </ul>	<ul style="list-style-type: none"> <li>• Public's Exhibit No. 1, Attachment MMN-1</li> <li>• Public's Exhibit No. 3, Attachment JDK-3</li> </ul>

<b>COST OF SERVICE AND RATE DESIGN</b>			
<b>Subject</b>	<b>OUCR Proposal</b>	<b>Supporting Witness</b>	<b>Workpaper or Exhibit Reference</b>
Rate Allocation	<ul style="list-style-type: none"> <li>• Across the Board Rate Allocation</li> </ul>	<ul style="list-style-type: none"> <li>• Jared Hoff</li> </ul>	<ul style="list-style-type: none"> <li>• Public's Exhibit No. 4</li> </ul>
Monthly Service Charge	<ul style="list-style-type: none"> <li>• Changes to Monthly Service Charge</li> </ul>	<ul style="list-style-type: none"> <li>• Mohab Nouredin</li> <li>• Jared Hoff</li> </ul>	<ul style="list-style-type: none"> <li>• Public's Exhibit No. 1, Attachment MMN-1</li> <li>• Public's Exhibit No. 4</li> </ul>



**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**Comparison of Petitioner's and OUCC's  
Revenue Requirements**

	<u>Per Petitioner</u>	<u>Per OUCC</u>	<u>Sch Ref</u>	<u>OUCC More (Less)</u>
Original Cost Rate Base	\$ 9,918,677	\$ 9,899,408	7	\$ (19,270)
Times: Weighted Cost of Capital	8.71%	8.71%	8	0.00%
Net Operating Income Required for Return on Original Cost Rate Base	<u>863,917</u>	<u>862,236</u>		<u>(1,681)</u>
Less: Adjusted Net Operating Income	<u>80,977</u>	<u>84,660</u>	4	<u>3,683</u>
Net Revenue Increase Required	<u>782,940</u>	<u>777,576</u>		<u>(5,364)</u>
Gross Revenue Conversion Factor	<u>133.6876%</u>	<u>133.6920%</u>	1	<u>0.00%</u>
Recommended Revenue Increase	<u>\$ 1,046,693</u>	<u>\$ 1,039,557</u>		<u>\$ (7,136)</u>
Percentage Increase (Net of Gas Cost Revenue)	<u>39.76%</u>	<u>42.35%</u>		<u>2.59%</u>
Percentage Increase (Including Gas Cost Revenue)	<u>23.50%</u>	<u>24.31%</u>		<u>0.81%</u>

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**Gross Revenue Conversion Factor**

	<u>Per Petitioner</u>	<u>Per OUCC</u>	
1 Gross Revenue Change	100.0000%	100.0000%	\$ 1,039,557
2 Less: Bad Debt Rate	<u>0.289500%</u>	<u>0.289500%</u>	3,010
3 Sub-total	99.7105%	99.7105%	
4 Less: IURC Fee (0.1467603% of Line 3)	<u>0.146760%</u>	<u>0.150000%</u>	1,559
5 Income Before State Income Taxes	99.563740%	99.560500%	
6 Less: State Income Tax (4.9% of Line 5)	4.878623%	4.878465%	50,714
7 Utility Receipts Tax Repealed (0.00%)	<u>0.000000%</u>	<u>0.000000%</u>	0
8 Income Before Federal Income Taxes	94.685117%	94.682035%	
9 Less: Federal Income Tax (21% of Line 8)	<u>19.883875%</u>	<u>19.883227%</u>	<u>206,698</u>
10 Change in Operating Income	<u>74.801242%</u>	<u>74.798808%</u>	<u>\$ 777,576</u>
11 Gross Revenue Conversion Factor	<u>133.6876%</u>	<u>133.6920%</u>	

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**Comparison of Net Operating Income Statement Adjustments**  
**Pro Forma Present Rates**

	<b>Petitioner's Pro Forma Adjustments</b>	<b>OUC's Pro Forma Adjustments</b>	<b>Difference Increase/ (Decrease)</b>
<b>Operating Revenues - Gas Sales</b>			
Eliminate GCA Revenue	\$ (1,821,452)	\$ (1,821,452)	\$ -
Weather Normalization (new HDD 30-yr average)	28,308	28,308	-
Loss of large customer	(252,383)	(252,383)	-
Increased revenue for additional customers	218,132	0	(218,132)
Change in Tarrifs	(37,038)	(9,371)	27,667
Incorrect Application of Tarrifs	-	12,260	12,260
<b>Other Gas Revenues</b>			
Reconnection fee, Return check fee, Credit card fee		1,210	1,210
<b>Total Revenue Adjustments</b>	<b>(1,864,433)</b>	<b>(2,041,428)</b>	<b>(176,995)</b>
<b>Natural Gas Purchased</b>			
Natural Gas Purchased	(1,837,970)	(1,837,970)	-
<b>Total Natural Gas Purchased</b>	<b>(1,837,970)</b>	<b>(1,837,970)</b>	<b>-</b>
<b>Operation and Maintenance Expense</b>			
Rate Case Expense	38,000	(1,083)	(39,083)
IURC Fee	461	635	174
Bad Debt Expense	5,060	636	(4,424)
Energy Efficiency Contribution for NTA	(7,600)	(45,107)	(37,507)
Payroll Expense	24,557	(5,043)	(29,600)
Retirement Contribution	70,526	60,526	(10,000)
Property Insurance	(4,907)	(6,313)	(1,406)
Employee Gifts and Events	(4,861)	(8,507)	(3,646)
Health Insurance	3,133	(21,929)	(25,062)
Severance Expense	(25,000)	(28,600)	(3,600)
<b>Total O&amp;M Expense Adjustments</b>	<b>99,369</b>	<b>(54,785)</b>	<b>(154,154)</b>
<b>Depreciation Expense</b>			
Depreciation Expense	(42,586)	(66,296)	(23,710)
<b>Total Depreciation Expense Adjustment</b>	<b>(42,586)</b>	<b>(66,296)</b>	<b>(23,710)</b>
<b>Taxes Other Than Income Taxes</b>			
FICA & unemployment taxes	2,539	(521)	(3,060)
Property Taxes	9,376	8,401	(975)
<b>Total Other Tax Adjustments</b>	<b>11,915</b>	<b>7,880</b>	<b>(4,035)</b>
<b>Federal and State Income Tax Expense</b>			
State Income Tax	(36,660)	(36,420)	240
Federal Income Tax	(193,968)	(192,987)	981
Federal Income Tax - EADIT	(35,572)	(35,572)	-
Deferred Income Taxes	-	-	-
<b>Total Income Tax Adjustments</b>	<b>(266,200)</b>	<b>(264,979)</b>	<b>1,221</b>
<b>Total Operating Expense Adjustments</b>	<b>(2,035,472)</b>	<b>(2,216,150)</b>	<b>(180,678)</b>
<b>Net Operating Income</b>	<b>\$ 171,039</b>	<b>\$ 174,722</b>	<b>\$ 3,683</b>

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**BALANCE SHEET**  
**As of September 30, 2023**

**ASSETS**

UTILITY PLANT IN SERVICE

Gas Plant in Service	\$16,814,561
General Plant	\$3,772,698
Accumulated Depreciation	<u>(9,908,843)</u>
Net Utility Plant in Service	<u>10,678,416</u>

INVESTMENTS

5,262,895

CURRENT ASSETS

Cash	613,213
Accounts Receivable	60,011
Materials and Supplies	33,862
Recoverable Gas Costs	181
Prepaid Expenses and Other Current Assets	<u>68,569</u>
Total Current Assets	<u>775,836</u>

Total Assets

\$16,717,147

**LIABILITIES AND SHAREHOLDERS' EQUITY**

SHAREHOLDERS' EQUITY

Capital Stock - Class A	\$106,160
Capital Stock - Class B	955,440
Unrealized Gain on Marketable Securities	0
Retained Earnings	12,145,368
Additional Paid-in capital	0

Total Shareholders' Equity

13,206,968

CURRENT LIABILITIES

Accounts Payable	303,232
Customer Deposits	53,390
Accrued Expenses	46,143
Contributions in Aid of Construction	1,012,000
Other Deferred Credits	<u>284,940</u>
Total Current Liabilities	<u>1,699,705</u>

DEFERRED INCOME TAXES

1,810,474

Total Liabilities and Shareholders' Equity

\$16,717,147

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**INCOME STATEMENT**  
**Twelve Months Ended September 30, 2023**

OPERATING REVENUES	
Gas Sales	\$4,497,158
Other Gas Revenues	18,553
Total Operating Revenues	<u>4,515,711</u>
OPERATING EXPENSES	
Natural Gas Purchased	1,837,970
Distribution Expense	397,812
Customer Accounts Expense	59,548
Administrative and General Expense	1,192,774
Depreciation	712,527
Taxes Other Than Income Taxes	160,140
Income Taxes	245,002
Total Operating Expenses	<u>4,605,773</u>
Net Operating Income	<u>(90,062)</u>
OTHER INCOME AND EXPENSE - Net	
Interest Income	34,769
Dividend Income	130,202
Gain (Loss) on Sale of Assets	581,973
Interest Expense	(3,289)
All Other Income, Net	(448)
Total Other Income and Expense - Net	<u>743,207</u>
Net Income	<u>\$653,145</u>

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**Pro Forma Net Operating Income Statement**

	Test Year Unadjusted	Pro Forma Adjustments	Sch Ref	Pro Forma at Present Rates	Increase / (Decrease)	Sch Ref	Pro Forma at Proposed Rates
<b>OPERATING REVENUES</b>							
Gas Sales	\$4,497,158			\$ 2,454,520	\$1,039,557	1	\$ 3,494,077
Eliminate GCA Revenue		(1,821,452)	Pet.				
Weather Normalization (new HDD 30-yr average)		28,308	Pet.				
Loss of large customer		(252,383)	Pet.				
Increased revenue for additional customers		0	5-1(a)				
Change in Tarrifs		(9,371)	5-1(b)				
Incorrect Application of Tarrifs		12,260	5-1(c)				
Other Gas Revenues	18,553	1,210	5-2(a)	\$ 19,763			19,763
<b>Total Revenue</b>	<b>4,515,711</b>	<b>(2,041,427)</b>		<b>2,474,283</b>	<b>1,039,557</b>		<b>3,513,840</b>
<b>OPERATING EXPENSES</b>							
Natural Gas Purchased	1,837,970	(1,837,970)	Pet.	0			0
Gas Operations and Maintenance Expenses	1,650,134			1,595,349			1,599,918
Rate Case Expense		(1,083)	6-1(a)				
IURC Fee		635	6-1(b)		1,559	1	
Bad Debt Expense		636	6-1(c)		3,010	1	
Energy Efficiency Contribution for NTA		(45,107)	6-1(d)				
Payroll Expense		(5,043)	6-1(e)				
Retirement Contribution		60,526	6-1(f)				
Property Insurance		(6,313)	6-1(g)				
Employee Gifts and Events		(8,507)	6-1(h)				
Health Insurance		(21,929)	6-1(i)				
Severance Expense		(28,600)	6-1(j)				
Depreciation	712,527	(66,296)	6-2(a)	646,231			646,231
Taxes Other Than Income Taxes	160,140			168,020			168,020
Payroll Taxes		(521)	6-3(a)				
Property Taxes		8,401	6-3(b)				
Income Taxes							
State Income Tax	18,555	(36,420)	6-4(a)	(17,865)	50,714	1	32,849
Federal Income Tax	(47,917)	(192,987)	6-4(b)	(240,904)	206,698	1	(34,206)
Federal Income Tax - EADIT	-	(35,572)	Pet.	(35,572)			(35,572)
Deferred Income Tax	274,364	-	Pet.	274,364			274,364
<b>Total Operating Expenses</b>	<b>4,605,773</b>	<b>(2,216,150)</b>		<b>2,389,623</b>	<b>261,981</b>		<b>2,651,604</b>
<b>Net Operating Income</b>	<b>\$ (90,062)</b>	<b>\$ 174,723</b>		<b>\$ 84,660</b>	<b>\$ 777,576</b>		<b>\$ 862,236</b>

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**OUCC Revenue Adjustments**

(1)

**Revenue Adjustments**

**(a) Additional Customers Added from Expansion Area**

Increased revenue for additional customers

Adjustment Increase (Decrease) \$ -

**(b) Change in Tariffs**

Decrease in operating revenue related to change in tariffs made after the end of the test year.

\$ (37,038)

Increase in operating revenue related to change in tariffs made after the end of the test year.

27,667

Adjustment Increase (Decrease) \$ (9,371)

**(c) Incorrect Application of Tariffs**

Increase in revenue due to incorrect application of tariff  
(Public's Exhibit No. 4, Attachment JJH-7, Page 1)

Adjustment Increase (Decrease) \$ 12,260

(2)

**Other Gas Revenue Adjustment**

**(a) Other Gas Revenues**

Increase in revenue for reconnection, insufficient funds and a new charge back fee for electronic funds payment  
(Public's Exhibit No. 1, Attachment MMN-6, Page 1)

Adjustment Increase (Decrease) \$ 1,210

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**OUCC Expense Adjustments**

(1)

**Operation and Maintenance Expenses**

**(a) Rate Case Expense**

Reflects OUCC adjustment to rate case expense. (Public's Exhibit No. 2, Attachment ZDL-1, Page 8)

Adjustment Increase (Decrease) \$ (1,083)

**(b) IURC Fee**

Reflects OUCC adjustment to IURC fee. (Public's Exhibit No. 2, Attachment ZDL-2, Page 5)

Adjustment Increase (Decrease) \$ 635

**(c) Bad Debt Expense**

Reflects OUCC adjustment to bad debt expense. (Public's Exhibit No. 2, Attachment ZDL-3, Page 8)

Adjustment Increase (Decrease) \$ 636

**(d) Energy Efficiency ("EE") Contribution for NTA**

Reflects OUCC adjustment to energy efficiency ("EE") Contribution for NTA.  
(Public's Exhibit No. 2, Attachment ZDL-4, Page 3)

Adjustment Increase (Decrease) \$ (45,107)

**(e) Payroll Expenses**

Reflects OUCC adjustment to payroll expense. (Public's Exhibit No. 2, Attachment ZDL-5, Page 5)

Adjustment Increase (Decrease) \$ (5,043)

**(f) Retirement Contribution**

Reflects OUCC adjustment to retirement contribution. (Public's Exhibit No. 2, Attachment ZDL-6, Page 1)

Adjustment Increase (Decrease) \$ 60,526

**(g) Property Insurance Expense**

Reflects OUCC adjustment to property insurance expense. (Public's Exhibit No. 2, Attachment ZDL-7, Page 10)

Adjustment Increase (Decrease) \$ (6,313)

**(h) Administrative and General Expense**

Reflects OUCC adjustment related to admin and general expenses. (Public's Exhibit No. 2, Attachment ZDL-8, Page 11)

Adjustment Increase (Decrease) \$ (8,507)



**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**OUCC Expense Adjustments**

(1)

**Operation and Maintenance Expenses (Continued)**

**(i) Health Insurance Expense**

Reflects OUCC adjustment to health insurance expense. (Public's Exhibit No. 2, Attachment ZDL-9, Page 13)

Adjustment Increase (Decrease) \$ (21,929)

**(j) Severance Expense**

Reflects OUCC adjustment to severance expense. (Public's Exhibit No. 2, Attachment ZDL-10, Page 3)

Adjustment Increase (Decrease) \$ (28,600)

(2)

**Depreciation Expense**

**(a) Depreciation Expense**

Reflects OUCC adjustment to depreciation expense. (Public's Exhibit No. 3, Attachment JDK-1, Page 1)

Adjustment Increase (Decrease) \$ (66,296)

(3)

**Taxes Other Than Income Taxes**

**(a) Payroll Tax Expense**

Reflects OUCC adjustment to payroll tax expense. (Public's Exhibit No. 2, Attachment ZDL-11, Page 1)

Adjustment Increase (Decrease) \$ (521)

**(b) Property Tax Expense**

Reflects OUCC adjustment to property tax expense. (Public's Exhibit No. 3, Attachment JDK-2, Page 1)

Adjustment Increase (Decrease) \$ 8,401

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**OUCC Expense Adjustments**

(4)

**Income Tax Expense**

To reflect pro forma income tax expense.

	<u>(a) Federal</u>	<u>(b) State</u>
Operating Revenue	\$ 2,474,283	\$ 2,474,283
O&M Expenses	1,595,349	1,595,349
Depreciation Expense	646,231	646,231
Taxes Other Than Income Taxes	168,020	168,020
State Income Tax	3,072	
Subtotal	<u>61,611</u>	<u>64,683</u>
Less: Synchronized interest	<u>(1,980)</u>	<u>(1,980)</u>
State Taxable Income		62,703
Federal Taxable Income	59,631	
Tax Rate	<u>21.0%</u>	<u>4.9%</u>
Tax at Present Rate	12,523	3,072
Less Test Year Expense	<u>205,510</u>	<u>39,492</u>
Income Tax Adjustments	<u>\$ (192,987)</u>	<u>\$ (36,420)</u>

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**Calculation of Pro Forma Original Cost Rate Base**

	<u>Per Petitioner</u>	<u>Per OUCC</u>	<u>OUCC More (Less)</u>
Utility Plant in Service as of September 30, 2023	\$ 20,587,259	\$ 20,587,259	\$ -
Less: Contribution In Aid of Construction (CIAC)	(1,012,000)	(1,012,000)	-
Less: Accumulated Depreciation as of September 30, 2023	(9,908,843)	(9,908,843)	-
Net Utility Plant in Service	9,666,416	9,666,416	-
Add: Working Capital	218,688	199,419	(19,269)
Materials & Supplies	33,573	33,573	-
Total Original Cost Rate Base	<u>\$ 9,918,677</u>	<u>\$ 9,899,408</u>	<u>\$ (19,269)</u>

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

**Pro forma Capital Structure**  
**As of September 30, 2023**

	<u>Amount</u>	<u>Percent of Total</u>	<u>Cost</u>	<u>Weighted Cost</u>
Common Equity	\$ 13,206,968	86.01%	10.10%	8.69%
Customer Deposits	53,390	0.35%	6.00%	0.02%
Deferred Income Taxes	1,810,474	11.79%	0.00%	0.00%
Regulatory Liabilities from Cause No. 45032-S10	284,940	1.86%	0.00%	0.00%
Total Capital	<u>\$ 15,355,772</u>	<u>100.00%</u>		<u>8.71%</u>

**Synchronized Interest Calculation**

Customer Deposits	0.35%	6.00%	0.02%
Total			<u>0.02%</u>
Total Original Cost Rate Base			<u>\$ 9,899,408</u>
Synchronized Interest Expense			<u>\$ 1,980</u>

**Indiana Utilities Corporation, Inc.**  
**Cause No. 46086**

Current and Proposed Monthly Service Charges

	<u>Current</u>	<u>Petitioner Proposed</u>	<u>OUCC Proposed</u>	<u>More (Less)</u>
<b>Rate 1R Gas Sales Residential Service</b>	\$ 13.13	\$ 18.00	\$ 13.13	\$ (4.87)
<b>Rate 1G Gas Sales General Service</b>	\$ 13.13	\$ 18.00	\$ 13.13	\$ (4.87)
<b>Rate 2 Gas Sales Large Commercial Service</b>	\$ 70.05	\$ 80.00	\$ 70.05	\$ (9.95)
<b>Rate 3 Gas Sales Industrial Service</b>	\$510.83	\$ 600.00	\$510.83	\$ (89.17)
<b>Rate 4 General Gas Transportation Service</b>	\$510.83	\$ 600.00	\$510.83	\$ (89.17)
<b>Rate 5 Large Volume Transportation Service</b>	\$973.01	\$1,025.00	\$973.01	\$ (51.99)
<b>Rate 6 School Transportation Service</b>	\$132.33	\$ 160.00	\$132.33	\$ (27.67)

**OUCG DR 2-5**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

On pages 2-3 of the petition, item #6, Petitioner states: “Petitioner requests authority to change its current base rates, charges, tariffs, rules, and regulations as supported by the evidence of record in this cause; based on an accounting test year of September 30, 2024...Petitioner also requests the use of a cutoff date for its utility plant in service for purposes of valuing its rate base in this cause of September 30, 2024.”

- a. Please confirm the accounting test year should be September 30, 2023.
- b. If subpart a. is confirmed, please indicate whether a revised petition will be filed.
- c. If subpart a. is not confirmed, please explain why not.
- d. Please confirm the rate base cut-off date should be September 30, 2023.
- e. If subpart d. is confirmed, please indicate whether a revised petition will be filed.
- f. If subpart d. is not confirmed, please explain why not.

**Information Provided:**

- a. Yes the Test Year is September 30, 2023.
- b. No, as this is a scrivener’s error and the correct test year is noted in the testimony of witness Frank Czeschin.
- c. See response to subparts a. and b.
- d. Yes the rate base cut-off is September 30, 2023.
- e. No, as this is a scrivener’s error and the correct rate base cut-off is noted in the testimony of witness Frank Czeschin.
- f. See response to subparts d. and e.

**OUCR DR 3-13**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

Referring to the Petition, page 3, paragraph 7 states: "Petitioner requests an adjustment to its base rates and charges so as to increase its revenue by approximately \$1,129,288..."

- a. Please explain how this \$1,129,288 was calculated, and where it can be found in Petitioner's revenue requirement schedules.
- b. If the petition is deemed to be in error, please indicate whether a corrected petition will be filed.

**Information Provided:**

Petition, page 3, paragraph 7 was intending to refer to Petitioner's Exhibit No. 4, Attachment BJM-2, Schedule 1, which indicates a total revenue increase in column (7) as \$1,129,228. Using \$1,129,288 rather than \$1,129,228 was a scrivener's error. Petitioner does not believe this scrivener's error need to be corrected, but will consider doing so if the OUCR prefers.

**OUCG DR 7-9**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

Refer to Petitioner's Exhibit No. 4, Attachment BJM-1, page 8, Adjustment 1(b) – Adjustment to operating revenue for move from 1981-2010 weather averages to the 1991-2020 averages. Petitioner provided excel workpaper titled "Weather Normalization." On the "Test Year" tab in the "Degree Day Adj" columns, please explain why Petitioner deducted the incorrect month of daily base load by month. (For example, in October, Petitioner deducted the November daily base load instead of the October daily base load.) If Petitioner believes the "Weather Normalization" workpaper is in error, please provide a corrected workpaper.

**Information Provided:**

Petitioner had a line shift in the formulas for each line in the Test Year tab in that section. A new workpaper will be provided as Attachment OUCG 7-9.

**Attachments Provided:**

- Attachment OUCG 7-9.xlsx



**OUCG DR 3-16**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

Referring to Petitioner's Exhibit No. 4, page 4, line 20 to page 5, line 2, Ms. Mann states: "This revenue is the expected total revenue for that expansion after it is completed and all customers hooked-up which could take as long as 6 years but the Petitioner is adding all the revenue in this proceeding. To the extent there are other adjustments that are made which may be questionable this adjustment should be offset." Please explain what Ms. Mann means by "other adjustments that are made which may be questionable," and how this adjustment would be offset.

**Information Provided:**

Petitioner's adjustment would normally only include the change in customers for 12 months after the end of the test year. Petitioner chose to include the total amount which will not be achieved until more than six years after the end of the test year. To the extent that the OUCG or any other party to the proceeding wish to introduce, change or adjust expenses that would lower the rate increase, Petitioner reminds the parties that this revenue adjustment could and should be adjusted downward to 12 months following the test year.

**OUCG DR 6-5**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

Referring to Petitioner's Lanesville projected revenue workpaper, please provide the earliest projected or actual connection date of the first customer to Petitioner's system in each category, the projected consumption in therms, and the tariff rate under which each customer will receive service for each of the following projected customer categories:

- a. 300 homes
- b. 20 small commercial
- c. Lanesville School
- d. St. John's School
- e. Moag Glass

**Information Provided:**

- a. Spring/Summer of 2025 for customers along the route toward Lanesville. For customers in the Town of Lanesville Fall of 2025. Estimated to serve 50/60 new customers per year. Projected consumption is 59 DTH per customer as stated in "New customers lanseville extension" workpaper previously served on the OUCG when Petitioner's case-in-chief was filed. Petitioner plans all to be served under Residential Rate class.
- b. Fall of 2025 for first customers. Projected consumption is 300 DTH per customer as stated in "New customers lanseville extension" workpaper previously served on the OUCG when Petitioner's case-in-chief was filed. Petitioner plans all to be served under Small Commercial Rate Class.
- c. The School has hired a consulting firm to evaluate potential cost savings of a switch to Natural Gas. Petitioner assumes that switching to Natural Gas will show significant savings. The existing School could be served, at the earliest, during the summer of 2026. Construction of the second School should start in 2026 and will be served when requested. Consumption for current School is 7,000 DTH annually based on letter received from consulting firm. The new School consumption is unknown, Petitioner has not seen the plans to determine the connected load, a reasonable estimate would be similar to the current school. Petitioner has received verbal commitment of the need for Natural Gas. Petitioner plans for the schools to be served under the Large Commercial Rate Class.
- d. This school is on the other side of the creek in town, construction plans for this area should start in 2026. Consumption is 2,200 DTH as stated in "New customers lanseville extension"

workpaper previously served on the OUCC when Petitioner's case-in-chief was filed. Petitioner plans all to serve under Large Commercial Rate Class.

- e. Fall of 2024. Consumption is 5,000 DTH as stated in "New customers lanseville extension" workpaper previously served on the OUCC when Petitioner's case-in-chief was filed. Petitioner plans to serve under Large Commercial Rate Class.

Attachment OUCC 6-5.1 is a revised "New customers lanseville extension" workpaper which provides the projected therms per year and tariff rates for each of the above categories. The tariff rates used for residential and small commercial contained an error at the highest rate block which has been corrected in the revised workpaper.

**Attachments Provided:**

- Attachment OUCC 6-5.1.xlsx

**OUCG DR 7-10**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

Refer to the Petitioner's Exhibit No. 4, Attachment BJM-1, page 8, Adjustment 1(e) - Decrease in operating revenue related to change in tariffs made after the end of the test year.

- a. Please provide the supporting workpaper for this adjustment amount of (\$37,038). Please show all calculations and explanations for how this amount was calculated, including but not limited to which tariffs were changed and in which Indiana Utility Regulatory Commission docket the filing was made.
- b. If the supporting workpaper was already provided, please provide the workpaper title.

**Information Provided:**

See Attachment OUCG 7-10.

**Attachments Provided:**

- Attachment OUCG 7-10.xls

**INDIANA UTILITIES CORPORATION**

**DETAIL OF CHANGE IN REVENUE REQUIREMENTS**

Line <u>No.</u>		
1	Rate Case preparation expenses annual amortization	\$ 27,500
2	Revenue Conversion factor	<u>1.346821</u>
3	Revenue requirement reduction	<u>\$ 37,038</u>
4	Revenue Conversion Factor applicable to tariff adjustment:	
5	Bad Debts effective rate (Cause No. 45116)	0.160000%
6	Public Utility Fee effective rate (Cause No. 46116)	0.120204%
7	Utility Receipts Tax effective rate (Repealed)	0.000000%
8	Total	<u>0.280204%</u>
9	Change in Net Operating Income (1.0000- L8)	99.719800%
10	State Income Taxes (Cause No. 45116)	5.733900%
11	Federal Income Taxes (Cause No. 45116)	<u>19.737000%</u>
12	Total	<u>74.248900%</u>
13	Revenue Conversion Factor (1.0000/ L12)	<u>1.346821</u>
14	Revenue (Cause No. 45116)	\$ 2,811,327
15	Revenue reduction (L3)	<u>(37,038)</u>
16	Proposed revenue	<u>\$ 2,774,289</u>
17	Percentage Decrease	<u>-1.3175%</u>

## INDIANA UTILITIES CORPORATION

### TARIFF UPDATE FOR REMOVAL OF RATE CASE EXPENSE

<u>Rates</u>	<u>Current</u>	<u>Change</u>	<u>Revised</u>
Residential and Small General Gas Service			
Customer Charge - per meter	13.50	(0.01318)	13.32
First 10 Dth per month -per Dth	5.0550	(0.01318)	4.9884
Over 10 Dth per month - per Dth	4.1492	(0.01318)	4.0945
Large Commercial Gas Service			
Customer Charge - per meter	72.00	(0.01318)	71.05
All Dth	3.8801	(0.01318)	3.8290
Industrial Gas Service			
Customer Charge - per meter	525.00	(0.01318)	518.08
All Dth	2.0005	(0.01318)	1.9741
General Transportation Service			
Customer Charge - per meter	525.00	(0.01318)	518.08
All Dth	2.0005	(0.01318)	1.9741
Large Transportation Service			
Customer Charge - per meter	1,000.00	(0.01318)	986.83
All Dth	0.8462	(0.01318)	0.8351
School Transportation Service			
Customer Charge - per meter	136.00	(0.01318)	134.21
All Dth	3.8853	(0.01318)	3.8341

Indiana Utilities Corp  
Energy Efficiency Rider

<u>Month</u>	<u># Resid Customers</u>	<u>Rate</u>	<u>Totals</u>	<u>Accum Totals</u>
Janauary	2,679	\$ (0.83)	\$ (2,223.57)	
February	2,686	\$ (0.83)	\$ (2,229.38)	
March	2,683	\$ (0.83)	\$ (2,226.89)	
April	2,683	\$ (0.83)	\$ (2,226.89)	
May	2,685	\$ (0.83)	\$ (2,228.55)	
June	2,670	\$ (0.83)	\$ (2,216.10)	
July	2,663	\$ (0.83)	\$ (2,210.29)	
August	2,666	\$ (0.83)	\$ (2,212.78)	
Sepember	2,668	\$ (0.83)	\$ (2,214.44)	
October	2,681	\$ (0.83)	\$ (2,225.23)	
November	2,717	\$ (0.83)	\$ (2,255.11)	
December	2,715	\$ (0.83)	\$ (2,253.45)	
Total 2021			\$ (26,722.68)	\$ (26,722.68)

<u>Month</u>	<u># Resid Customers</u>	<u>Rate</u>	<u>Totals</u>	
Janauary	2,728	\$ (0.83)	\$ (2,264.24)	
February	2,729	\$ (0.83)	\$ (2,265.07)	
March	2,725	\$ (0.83)	\$ (2,261.75)	
April	2,723	\$ (0.83)	\$ (2,260.09)	
May	2,719	\$ (0.83)	\$ (2,256.77)	
June	2,717	\$ (0.83)	\$ (2,255.11)	
July	2,713	\$ (0.83)	\$ (2,251.79)	
August	2,716	\$ (0.83)	\$ (2,254.28)	
Sepember	2,724	\$ (0.83)	\$ (2,260.92)	
October	2,751	\$ (0.83)	\$ (2,283.33)	
November	2,770	\$ (0.83)	\$ (2,299.10)	
December	2,776	\$ (0.83)	\$ (2,304.08)	
Total 2022			\$ (27,216.53)	\$ (53,939.21)

<u>Month</u>	<u># Resid</u> <u>Customers</u>	<u>Rate</u>	<u>Totals</u>
Janauary	2,791	\$ (0.83) \$	(2,316.53)
February	2,786	\$ (0.83) \$	(2,312.38)
March	2,796	\$ (0.83) \$	(2,320.68)
April	2,795	\$ (0.83) \$	(2,319.85)
May	2,797	\$ (0.83) \$	(2,321.51)
June	2,773	\$ (0.83) \$	(2,301.59)
July	2,766	\$ (0.83) \$	(2,295.78)
August	2,764	\$ (0.83) \$	(2,294.12)
Sepember	2,769	\$ (0.83) \$	(2,298.27)
October	2,801	\$ (0.83) \$	(2,324.83)
November	2,817	\$ (0.83) \$	(2,338.11) Current # customers 11/30/23
December	2,824	\$ (0.80) \$	(2,259.20) Current # customers 12/29/23
Total 2023		\$	(27,702.85) \$ (81,642.06)
Target			\$ 81,637.00
Difference			\$ (5.06)



INDIANA UTILITIES CORPORATION  
CAUSE NO. 46086

Other Gas Reveune

#	2019	2020	2021	2022	2023	3-Year	New	Increase to revenue
						Average	Charges	from new charges
						A	B	A x B
Reconnects	38	32	21	27	26	25	\$ 35	\$ 875.00
Return Checks	26	15	19	19	20	19	15	285.00
Credit Card / Kiosk	0	0	6	3	7	5	10	50.00
								<u>\$ 1,210.00</u>

**OUCG DR 3-3**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

Referring to the proposed Charge Back fee (Petitioner's Exhibit No. 2, page 6, lines 1-10), please provide the following:

- a. The number of payments subject to the proposed Charge Back fee which were returned for insufficient funds, broken down by method of payment, each fiscal year from October 1, 2019, to September 30, 2023.
- b. Whether any payments returned for insufficient funds made by any method other than by check were assessed the Insufficient Funds Check charge. If yes, please provide the number of such charges assessed broken down by payment method for each fiscal year from October 1, 2019, to September 30, 2023.
- c. The cost per payment of processing a returned electronic payment with insufficient funds each fiscal year from October 1, 2019, to September 30, 2023. Please also provide the cost assessed by any financial institute used by Petitioner for a returned electronic payment due to insufficient funds and the internal costs for each such payment.
- d. Whether Petitioner is aware of any other utilities in Indiana which have both an Insufficient Funds Check charge *and* a Charge Back fee, or equivalents. If yes, please provide which utility or utilities have both these fees.

**Information Provided:**

- a. – c. See Attachments 3-3.1 through 3-3.6 showing per year return items. Bank fees are not per item any longer, they are not analysis fee based meaning it is based on account balance, account activity, and average daily balance.
- d. Indiana Utilities Corporation is not aware of other private utilities that process both fees. *See also* Petitioner's response to OUCG 3-2.

**Attachments Provided:**

- Attachment OUCG 3-3.1.xls

#	2019	2020	2021	2022	2023
Reconnects	38	32	21	27	26
Return Checks	26	15	19	19	20
Credit Card / Kiosk	0	0	6	3	7

**OUCG DR 7-12**

**DATA INFORMATION REQUEST  
Indiana Utilities Corporation**

**Cause No. 46086**

**Information Requested:**

In Cause Nos. 45032 S10 and 45116, Petitioner was ordered to refund \$431,483 over a period of 12.13 years, or \$35,572 per year, for the excess accumulated deferred income tax.

- a. Please explain where this refund is reflected in Petitioner's revenue requirement schedules.
- b. If the amount is not reflected in the schedules, please confirm it should be reflected in the schedules.
- c. If subpart b. is not confirmed, please explain why not.

**Information Provided:**

- a. It is not.
- b. Confirmed.
- c. N/A.

**AFFIRMATION**

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



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Mohab Noureldin  
Utility Analyst  
Indiana Office of  
Utility Consumer Counselor  
Cause No. 46086  
Indiana Utilities Corp. Inc.

09-19-2024

Date

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor's Testimony of OUCC Witness Mohab M. Noureldin* has been served upon the following parties of record in the captioned proceeding by electronic service on September 19, 2024.

Nicholas K. Kile  
Lauren Aguilar  
**Barnes & Thornburg LLP**  
Email: Nicholas.Kile@btlaw.com  
Email: Lauren.Aguilar@btlaw.com



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Matthew W. Kappus  
Attorney No. 35807-49  
Deputy Consumer Counselor

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