

**SOUTHERN INDIANA GAS AND ELECTRIC COMPANY
d/b/a CENTERPOINT ENERGY INDIANA SOUTH
(CENTERPOINT)**

IURC CAUSE NO. 45501

FILED
February 23, 2021
**INDIANA UTILITY
REGULATORY COMMISSION**

**DIRECT TESTIMONY
OF
RINA H. HARRIS
DIRECTOR, ENERGY SOLUTIONS AND BUSINESS SERVICES**

**IURC
PETITIONER'S**
EXHIBIT NO. 9
DATE 6-21-21 REPORTER AT

ON

ECONOMIC DEVELOPMENT OPPORTUNITIES FOR PROPOSED SOLAR PROJECTS

**SPONSORING PETITIONER'S EXHIBIT NO. 9 (PUBLIC)
ATTACHMENTS RHH-1 AND RHH-4**

DIRECT TESTIMONY OF RINA H. HARRIS

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Rina H. Harris. My business address is 211 NW Riverside Dr, Evansville, Indiana 47708.

Q. On whose behalf are you submitting this direct testimony?

A. I am submitting testimony on behalf of Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South ("Petitioner", "CenterPoint", or "Company"), which is an indirect subsidiary of CenterPoint Energy, Inc.

Q. What position do you hold with Petitioner?

A. I am the Director of Energy Solutions and Business Services.

Q. Please describe your educational and professional experience.

A. I received a Bachelor of Science degree in Public Affairs from Indiana University in 2005. I also received a Master of Science degree in Public Affairs from Indiana University in 2007.

I have been employed by Petitioner since 2008 in a few different positions. Previously, I was the Manager of Gas Conservation and DSM, and had responsibility for the management of all aspects of the gas conservation portfolio for CenterPoint's Indiana and Ohio regulated utilities and oversight over all Evaluation and Planning activities. Prior to that, I was the Supervisor of DSM Evaluation and Planning with responsibility for management of all electric and gas evaluation activities, program planning, and conservation related market research. I have also worked in Market Research with a focus on conservation initiatives related to demographic analysis, segmentation, targeted marketing, and other special projects.

Q. What are your duties and responsibilities as Director of Energy Solutions and Business Services?

1 A. I am responsible for managing all aspects of large account management, economic
2 development, and gas and electric energy efficiency ("EE"), and demand side
3 management ("DSM") programs for CenterPoint's Indiana and Ohio regulated utilities. In
4 this position, I oversee all aspects of strategic customer consultation around energy
5 management and cost savings. My responsibilities include interfacing with customers to
6 respond to their natural gas and electric service needs and keeping abreast of potential
7 economic development opportunities within Petitioner's service territories.

8
9 **Q. Have you previously testified before the Indiana Utility Regulatory Commission**
10 **("Commission")?**

11 A. Yes. Most recently, I am testifying on behalf of Petitioner and Indiana Gas Company, Inc.
12 in their respective general gas rate case proceedings, Cause Nos. 45447 and 45468. I
13 testified in Cause No. 45387, where Petitioner sought approval to continue its electric EE
14 programs, and in Cause No. 43405-DSMA17, where Petitioner sought approval to recover
15 costs associated with customer participation in Company sponsored EE and demand
16 response (including direct load control) programs, and lost revenues resulting from
17 implementation of approved programs. I testified in Cause No. 45222, where Petitioner
18 requested an extension of its EE Gas Programs and the EER rate mechanism as part of
19 its general rate case. I also testified in Cause No. 45052, where Petitioner proposed to
20 construct a combined cycle gas turbine. In addition, I testified in Cause No. 44927, where
21 Petitioner sought approval of its 2018 – 2020 EE Plan. I have also testified in Petitioner's
22 Cause No. 44645 remand case, where Petitioner received approval to recover lost
23 revenues associated with the Petitioner's 2016 – 2017 Electric DSM Plan. And, I also
24 testified in Cause No. 44598, where Petitioner sought approval for its Indiana gas EE
25 programs, including integrated gas and electric programs.

26
27
28 **II. PURPOSE & SCOPE OF TESTIMONY**

29
30 **Q. What is the purpose of your testimony in this proceeding?**

31 A. My testimony supports Petitioner's proposal to purchase and acquire, indirectly through a
32 Build Transfer Agreement ("BTA"), a solar facility in Posey County, Indiana (the "Posey
33 County Solar Project"), as well as a Power Purchase Agreement ("PPA") to purchase

energy and capacity from a solar project to be located in Warrick County, Indiana (the "Warrick County Solar Project"). I explain that addition of renewable energy to a utility's resources has become increasingly important as large customers now emphasize the importance of addressing climate change by reviewing both their own operations as well as the sources of energy relied upon by their local utility. It is significant that both projects will be located in southern Indiana so customers will know that CenterPoint's generation includes local resource. As described below, certain existing customers of CenterPoint have public policies that promote increased reliance on energy resources that reduce CO₂ emissions. Therefore, these customers increasingly will be interested in how CenterPoint provides them with electric service. Consistent with this trend, Petitioner's ability to attract and retain large customers will likely be influenced by the Company's ability to demonstrate that it supports the use of renewable energy.

Q. Are you sponsoring any attachments in this proceeding?

A. Yes. I am sponsoring the following attachments:

- Petitioner's Exhibit No. 9, Attachment RHH-1: Letters of Support from Economic Development Coalition of Southwest Indiana and Evansville Industrial Foundation;
- Petitioner's Exhibit No. 9, Attachment RHH-2: Toyota Press Release Regarding Reductions of Carbon Output;
- Petitioner's Exhibit No. 9, Attachment RHH-3: Letter of Support from AstraZeneca; and
- Petitioner's Exhibit No. 9, Attachment RHH-4: Letter of Support from Berry Plastics.

III. IMPORTANCE OF SUSTAINABILITY INITIATIVES

Q. As part of sustainability initiatives, have large corporations begun to adopt renewable energy goals?

A. Yes. Within Petitioner's service territory more than a dozen corporations have publicly created sustainable and renewable energy goals or support the efforts taken by Petitioner to include renewable projects in its Generation Transition Plan. Some of these customers have published global initiatives, which include investment in dedicated renewable resources as part of meeting renewable energy goals by a specific target date. These

1 policies also create an expectation that utilities will move toward diverse generation
2 portfolios to assist corporations with their renewable goals. CenterPoint believes these
3 types of commitments will continue to become more prevalent among its large customers.
4

5 **Q. Is Petitioner's proposal to purchase the Posey County Solar Project and enter into**
6 **a PPA for energy produced by the Warrick County Solar Project responsive to these**
7 **large customer initiatives?**

8 A. Yes. Petitioner has informed certain large customers regarding its plan to add renewable
9 energy within CenterPoint's electric utility footprint. The fact that both the Posey County
10 Solar Project and Warrick County Solar Project are physically located in our assigned
11 service area adds to its perceived value as a renewable, local resource. Several larger
12 customers support CenterPoint's transition to more renewable investments, including
13 Toyota, AstraZeneca, Walmart, Berry Global, St. Vincent, Deaconess Health Networks,
14 and the Evansville Vanderburgh School Corporation. Additionally, the Economic
15 Development Coalition of Southwest Indiana and the Evansville Industrial Foundation
16 have provided verbal and written support, with the written support of each group attached
17 as Petitioner's Exhibit No. 9, Attachment RHH-1.
18

19 Walmart and Berry Plastics have joined the Corporate Renewable Energy Buyers'
20 Principles group. This group consists of over fifty global companies that publicly set goals
21 to increase visibility of renewable energy standards as core elements of business and
22 sustainability strategies.
23


24 St. Vincent and Deaconess Health Networks, the two largest hospitals in Southwest
25 Indiana, support the addition of renewable resources as it assists with carbon reduction in
26 the region. Petitioner's effort to reduce carbon is a positive impact on the community's
27 health and is aligned with the hospitals' work to create healthier sustainable lifestyles. The
28 Evansville Vanderburgh School Corporation has invested in solar energy onsite for two
29 schools: Plaza Park Middle School and the Southern Indiana Career and Technical
30 Center. These assets will complement CenterPoint's planned solar generation resources.
31 Finally, Toyota and AstraZeneca have aggressive renewable energy and sustainable
32 goals for their manufacturing facilities. Toyota has implemented a plan to eliminate by
33 2050 all carbon from their manufacturing and output process including vehicle emissions,

1 manufacturing parts, and materials and logistics. I have a press release from Toyota,
2 dated July 24, 2019, announcing Toyota's plan to reduce carbon emissions by 40 percent
3 in the next three years as part of its goal for zero carbon output over the next thirty years,
4 attached as Petitioner's Exhibit No. 9, Attachment RHH-2. Further, AstraZeneca has
5 pledged to procure 100 percent renewable power for all of its manufacturing facilities by
6 2025. AstraZeneca and Berry Plastics have signed support letters attached as Petitioner's
7 Exhibit No. 9, Attachments RHH-3 and RHH-4, respectively.
8

9 **Q. Have any customers expressed an interest in entering into a contract to purchase**
10 **renewable energy from CenterPoint?**

11 A. Yes. Four of CenterPoint's large customers have expressed an interest in potentially
12 entering a contract to purchase renewable energy from CenterPoint. Petitioner would
13 seek approval of any such contracts in a separate proceeding.
14

15 **Q. Has Petitioner considered making all of the renewable power produced by the**
16 **Posey County Solar Project or purchased from the Warrick County Solar Project**
17 **available by specific customer agreement?**

18 A. No. As further discussed by Petitioner's Witness Wayne G. Games, the Posey County
19 Solar Project and PPA for the Warrick County Solar Project are intended to replace
20 baseload generation on Petitioner's system and, therefore, are designed to serve the
21 needs of all customers. That said, Petitioner believes there is a possibility that some of
22 its large customers could enter into a letter of intent to purchase power generated from
23 renewable resources. However, there is no one-size-fits-all solution for all customers.
24 Petitioner is willing to work with customers to determine the best approach for each. A
25 utility controlled and locally sited asset, like the Posey County Solar Project, provides more
26 assurance for utilization during peak hours of demand within the connected transmission
27 footprint. Renewable energy provided through PPAs also offers benefits for customers as
28 described by Petitioner's Witness  Justin M. Jones. Both projects are locally placed
29 renewable resources, which reduce the risk of congestion and increase efficiencies for
30 end use customers.
31
32

1 **Q. Will the addition of the Posey County Solar Project and purchase of power from the**
2 **Warrick County Solar Project play a role in retaining large customers?**

3 A. Yes, as is evident from the customers listed above, utilities are expected to provide
4 solutions to assist with manufacturers' renewable and sustainable energy goals.
5 Companies are setting these goals leading to a reduction in fossil fuels consistent with
6 their sustainability strategies. If these companies cannot find a solution with their local
7 utility partners, they may procure energy from other sources or make strategic decisions
8 to relocate manufacturing load. There are examples of businesses adding renewable
9 energy to serve their facilities through PPAs or investing in offsite renewable energy. In
10 Indiana, for instance, Cummins has on-site renewable generation and has entered into
11 "virtual" power purchase agreements for the purchase of energy from wind generation.
12 The Toyota press release attached as Petitioner's Exhibit No. 9, Attachment RHH-2 also
13 touts the "power of" virtual power purchase agreements.
14

15 The Posey County Solar Project and the PPA for the Warrick County Solar Project are an
16 important step in facilitating the ability to provide our customers with a portion of their
17 demand via renewable energy.
18

19 **Q. Is it likely that having a diverse portfolio will be a factor in terms of attracting new**
20 **large customers to locate in Vectren South's territory?**

21 A. Yes. In the future, large customers will likely prioritize having a utility that uses renewable
22 energy to assist them in meeting sustainability policies as well as actual established
23 renewable energy targets.
24

25 **Q. Has CenterPoint received requests from site selectors reviewing land options for**
26 **new industrial customers in the area regarding the availability of renewable energy?**

27 A. Yes. CenterPoint has received a significant increase in Requests for Proposals ("RFP")
28 over the last four years with an expectation for access to renewable resources including
29 local generation assets. Industrial customers and investors are striving to meet
30 Environmental, Social and Governance ("ESG") initiatives which deliver sustainable
31 products to the consumer market. CenterPoint must remain deliberate in our strategy to
32 diversify generation and maintain a competitive advantage to secure projects in the future.
33

1 **Q. Aside from being responsive to the sustainability policies of existing and potential**
2 **large customers, does the addition of renewable resources have other benefits**
3 **within Petitioner's service territory and to its customers?**

4 A. Yes. The communities in Petitioner's service territory will benefit to the extent the addition
5 of solar resources supports growth among Petitioner's large customers or attracts new
6 customers. The creation of additional jobs in the communities Petitioner serves has a
7 ripple effect on the local economy. Ultimately, to the extent the addition of renewable
8 resources supports large customer retention and attraction, over time the utility's fixed
9 costs will be spread over a larger customer base to the benefit of all customers.

10
11 **Q. Do you have any evidence that Petitioner's residential customers believe Petitioner**
12 **should be moving toward renewable energy sources?**

13 A. Yes. The City of Evansville has recently developed a Climate Action Plan¹, which is
14 supported by the community – residential and non-residential customers alike -- and
15 outlines how the City will reduce its greenhouse gas emissions to mitigate climate change.
16 The community has been engaged through virtual public townhall meetings, community
17 meetings and presentations, stakeholder meetings, and resident surveys to understand
18 perspectives on furthering sustainability and renewable energy goals in our area.
19 Evansville's Climate Action Plan Strategies, supported by CenterPoint, are as follows:

- 20
21 ○ Support of CenterPoint's 2019/ 2020 IRP and adoption of renewable energy;
22 ○ Utilize CenterPoint's EE programs to a greater extent;
23 ○ Seek additional funding to promote and expand use of federal residential
24 weatherization assistance program; and
25 ○ Expand of CenterPoint and City EE and renewable public education programs.

26
27
28
29
30
31

¹ climateevansville.com

1 **IV. CONCLUSION**

2
3 **Q. In sum, how will acquiring the Posey County Solar Project and entering in the PPA**
4 **for energy produced by the Warrick County Solar Project be beneficial to**
5 **CenterPoint's customers?**

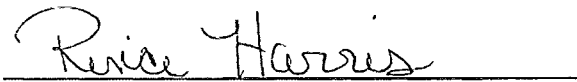
6 A. Customers large and small support the addition of renewable resources. Large customers,
7 who have publicly committed to renewable energy goals, are eager to purchase the
8 resulting green power, while many residential customers are in favor of CenterPoint
9 diversifying its portfolio and support incorporating solar power into the resource mix.
10 CenterPoint believes the Posey County Solar Project and PPA for the Warrick County
11 Solar Project are a significant step towards strategic alignment with our customers.

12
13 **Q. Does this conclude your direct testimony in this proceeding?**

14 A. Yes, at the present time.

VERIFICATION

I, Rina H. Harris, Director, Energy Solutions and Business Services for Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South, under the penalty of perjury, affirm that the answers in the foregoing Direct Testimony are true to the best of my knowledge, information and belief.

A handwritten signature in cursive script that reads "Rina Harris". The signature is written in black ink and is positioned above a solid horizontal line.

Rina H. Harris
Director, Energy Solutions and Business Services

October 9, 2020

Brad Borum
Director of Research, Policy and Planning
Indiana Utility Regulatory Commission
PNC Center, Suite 1500 East
101 West Washington Street
Indianapolis, IN 46204

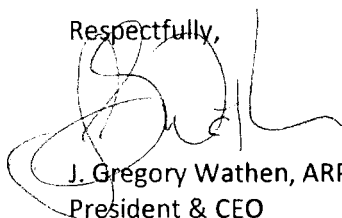
Dear Mr. Borum:

Vectren/CenterPoint Energy's 2019 Integrated Resource Plan (IRP) reflects positive developments with respect to its resource mix. As a result of the Preferred Plan, Vectren/Centerpoint Energy's proposal to reduce nearly 75% of carbon dioxide or CO2 emissions by 2035; and, diversify its set of resources from a blend of renewables, coal and natural gas, while minimizing customer costs over the next 20 years, is a big win for all of Southwest Indiana.

The directional nature of the IRP is significant and beneficial as well for economic growth in Southwest Indiana. The shift to renewable resources supports future growth among Vectren/CenterPoint Energy's large industrial and commercial clients as well as attracts new customers to its overall base. Renewable energy has become increasingly important in addressing climate change; and, by Vectren/CenterPoint reviewing their own current operations along with the sources of energy relied upon by the local utility, Indiana and Southwest Indiana residents become the beneficiaries.

Furthermore, the creation of additional renewable jobs in the communities Vectren/CenterPoint Energy serves has a ripple effect on the local economy that supports growth, retention and attraction. On behalf of the Economic Development Coalition of Southwest Indiana and the Evansville Industrial Foundation, we support of the direction of Vectren/CenterPoint Energy's IRP generation resource mix and encourage its approval.

Respectfully,



J. Gregory Wathen, ARP
President & CEO
Economic Development Coalition of Southwest Indiana



Brian Williams
Secretary of the Board
Evansville Industrial Foundation

Toyota to Reduce Emissions from North American Operations by up to Forty Percent

July 24, 2019

THE POWER OF VPPAs

VIRTUAL
POWER
PURCHASE
AGREEMENT



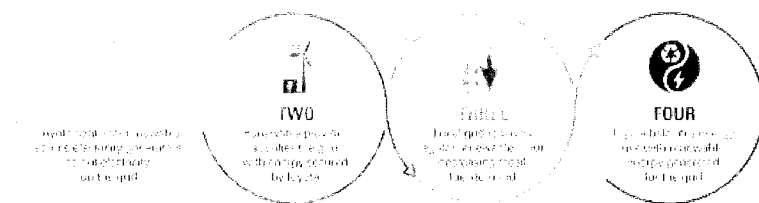
TARGET RENEWABLE
ENERGY SOURCES =
ZERO EMISSIONS

40

BY DRIVING A CLEAN MOBILITY FUTURE TOGETHER

Toyota is committed to reducing emissions from the energy we use. We are taking action, through power purchase agreements, to supply emissions-free renewable energy to the same grid we get our power from. This is one step in converting our energy demand to emissions-free energy.

VISION FOR TOYOTA'S VPPAs



WIND

SOLAR



VPPAs = New Renewable Generation = Reduced Carbon Emissions = Environmental Sustainability

PLANO, Texas (July 24, 2019) – Toyota Motor North America (TMNA) is committing to aggressively reduce its carbon output in the United States by entering into Virtual Power Purchase Agreements (VPPAs). It will use them to reduce emissions from its North American operations by up to forty percent over the next 3 years.

The move represents another major step towards Toyota's Environmental Challenge 2050 goal of cutting global emissions from plant operations to zero globally by the year 2050.

Under the VPPAs, which the company expects to commence later this year, TMNA will contract with renewable energy providers to generate wind and solar power that will be provided directly to regional electric grids. The supply of renewable power is expected to reduce use of fossil fuels while improving the sustainability of the electric grid in the area.

By powering its operations from the enhanced grid and applying Renewable Energy Credits earned by funding the generation of renewable electricity, Toyota expects to substantially offset emissions from its facilities in North America.

“Toyota has long been defined by its commitment to responsible environmental practices, and we’re proud to build upon that great legacy today,” said Kevin Butt, General Manager and Regional Environmental Sustainability Director for Toyota Motor North America. “We are committed to setting an example of sustainability that goes beyond vehicles to show how a company can significantly reduce the environmental impact of its operations. By cutting our U.S. emissions by forty percent, we will be that much closer to our goal of having a net positive impact on the environment by the middle of this century.”

Toyota’s VPPA program is the result of more than six years of research into how best to reduce and offset emissions from the company’s operations, working in partnership with MIT, the National Renewable Energy Lab, the Rocky Mountain Institute, and others. It is part of a wider effort across the company to reduce the environmental impact of enterprise operations as it also works to limit vehicle emissions.

This endeavor supports Toyota’s Environmental Challenge 2050. Launched in 2015, the Challenge sets out six objectives for the company’s global operations, including:

1. A ninety percent reduction in global average CO2 emissions from new vehicles vs. 2010 levels;
2. The complete elimination of CO2 emissions from the entire vehicle life cycle; zero emissions at all manufacturing plants worldwide;
3. Elimination of CO2 emissions from all suppliers and logistics streams from overall operations;
4. Minimizing water usage and implementing water discharge management protocols;
5. Promoting global deployment of end-of-life vehicle treatment and recycling, and;
6. Connecting and promoting nature conservation activities outside of the Toyota Group in the communities where we operate.

AstraZeneca

Dr. Bradley Borum
Research, Policy and Planning Division
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500
East Indianapolis, IN 46204

AstraZeneca
Mt. Vernon Supply Site
4601 Highway 62 East
Mt. Vernon, Indiana 47620
T: 812.307.2000
astrazeneca.com

Re: Vectren June 2020 IRP Submission to IURC
05 October 2020

Dr. Borum:

We at AstraZeneca— Mount Vernon, IN (AZ-MTV) have thoroughly reviewed the Integrated Resource Plan (IRP) submitted to the Indiana Utility Regulatory Commission (IURC) and am fond of the strides Vectren is making to reduce carbon foot print in the SW Indiana community. We are in strategic support of your efforts to use natural gas and renewables for generating electricity. Natural gas is proving to be a sustainable fuel from a reliability and cost perspective. Idling coal plants will insure clean ground water as ash ponds at coal generating plants are idled. Additionally, air pollution and particulate matter have appeared to have an adverse impact on the higher than normal cancer statistics in SW Indiana compared to other regions of the Midwest and United States in general.

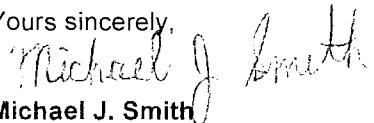
As you know, AZ as a Corporation is striving to be carbon neutral at its North American manufacturing sites by 2025, and has participated in the Dow Jones Sustainability Index assessment process. Renewables from this decision are a large part of our consideration in what we can do to meet Corporate Environmental goals.

We're heavily evaluating how we can reduce environmental impact at MTV in the waste arena. We plan to be 100% "land fill" free by the end of 2020. Most of our plant waste is re-purposed as steam energy for use in the City of Indianapolis via Covanta. We're evaluating solar and cogeneration along with Vectren renewable options to reach our environmental impact goals. Options for synthetic gas to reduce our foot print might also be a welcome addition. However, cost goals from federal governmental pressures toward pharmaceutical pricing are an important variable in our competition against sister plants all across North America including Puerto Rico.

We are concerned as well, with where regulated pricing from renewables accepted by the IURC will land Vectren considering it's higher than state average for generation cost for coal plants in particular. We are in a region of the state of Indiana where electricity costs are considerably higher than state average.

We are in full support of renewables for a cleaner state, but would hope that gas turbines of the highest efficiency are considered, voltage and VAR control aren't forgotten on the technical acumen front, and costs are held in reasonable check. A substantial increase in utility cost challenges our Cost of Goods Sold (COGS) KPI metric and hurts our viability in the marketplace against major competitors in other regions and even our own sister plants in the US and Europe.

Yours sincerely,



Michael J. Smith
Director, Site Services

O: 812.307.2043

M: 812.789.3123

E: michael.smith14@astrazeneca.com

AstraZeneca PLC
No. 2723534, Registered Office,
1 Francis Crick Avenue,
Cambridge Biomedical Campus,
Cambridge CB2 0AA

October 9, 2020

RE: 2019-2020 CenterPoint Energy Integrated Resource Plan

On behalf of Berry Global – Evansville, IN, we have reviewed and spoken with CenterPoint Energy representatives regarding the Integrated Resource Plan (IRP) submitted to the Indiana Utility Regulatory Commission (IURC). Berry Global supports CenterPoint Energy's efforts to diversify their generation portfolio. The collective effort to reduce the carbon intensity of our energy sources while continuing to provide reliable and cost-effective power is imperative to our production and success. Berry Global and CenterPoint Energy are key partners in this strategy.

Additionally, Berry Global supports the transition to renewable power, which aligns with our Impact 2025 sustainability strategy. Berry has set a science-based greenhouse gas (GHG) reduction target in line with the Paris Agreement to reduce our Scope 1+2 GHG emissions intensity 25% by 2025 versus a 2016 baseline. Electricity represents 87% of our Scope 1+2 GHG emissions. The increase in renewable energy and decrease in carbon intensity of CenterPoint Energy's portfolio will provide tremendous assistance in achieving our goal.

Many of our stakeholders have stressed the importance of Berry Global reducing our carbon footprint. This includes our investors, which are increasingly using Environmental, Social, and Governance (ESG) criteria to evaluate the long-term risks and impacts of their investments. Customers are another stakeholder that has been vocal about the need to reduce emissions. It is therefore critical that we reduce the carbon footprint of our operations and products in order to remain competitive.

Berry Global fully supports CenterPoint Energy's plan and trusts the IURC will approve new generation sources.

Thank you for the consideration.

Sincerely,



Rodgers Greenawalt
EVP of Operations
Berry Global

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

IURC
PETITIONER'S
EXHIBIT NO. 10
DATE 6-21-21 REPORTER AT

CAUSE NO. 45501

FILED PETITION OF SOUTHERN INDIANA GAS AND)
TRIC COMPANY d/b/a CENTERPOINT ENERGY)
ANA SOUTH ("CENTERPOINT") FOR AN ORDER: (1))
ING CENTERPOINT A CERTIFICATE OF PUBLIC)
VENIENCE AND NECESSITY, PURSUANT TO IND.)
DE CH. 8-1-8.5, TO PURCHASE AND ACQUIRE,)
ROUGH A BUILD TRANSFER AGREEMENT ("BTA"), A)
LAR POWER ELECTRIC GENERATING FACILITY IN)
SEY COUNTY, INDIANA, THAT WILL HAVE AN)
GREGATE NAMEPLATE CAPACITY OF)
PPROXIMATELY 300 MEGAWATTS ALTERNATING)
URRENT ("MWAC") (THE "POSEY COUNTY SOLAR)
ROJECT"); (2) FINDING THE POSEY COUNTY SOLAR)
PROJECT CONSTITUTES A CLEAN ENERGY PROJECT)
UNDER IND. CODE CH. 8-1-8.8; (3) APPROVING)
ASSOCIATED RATEMAKING AND ACCOUNTING)
TREATMENT FOR THE BTA PURSUANT TO IND. CODE § 8-)
1-8.8-11; (4) AUTHORIZING CENTERPOINT TO ENTER)
INTO A POWER PURCHASE AGREEMENT ("PPA") TO)
PURCHASE ENERGY AND CAPACITY FROM A 100 MWAC)
SOLAR PROJECT IN WARRICK COUNTY, INDIANA (THE)
"WARRICK COUNTY SOLAR PROJECT"), OVER A 25-YEAR)
TERM AND FINDING THE TERMS OF THE PPA)
REASONABLE; (5) DETERMINING THE WARRICK COUNTY)
SOLAR PROJECT TO BE AN ELIGIBLE CLEAN ENERGY)
PROJECT FOR PURPOSES OF IND. CODE CH. 8-1-8.8; (6))
AUTHORIZING FULL RECOVERY OF THE POWER)
PURCHASE COSTS UNDER THE PPA FROM CUSTOMERS)
THROUGH THE FUEL ADJUSTMENT CLAUSE OVER THE)
ENTIRE TERM OF THE PPA; (7) APPROVING ASSOCIATED)
RATEMAKING AND ACCOUNTING TREATMENT FOR THE)
PPA PURSUANT TO IND. CODE § 8-1-8.8-11; AND (8))
APPROVING CONFIDENTIAL TREATMENT OF THE BTA)
AND PPA PRICING AND OTHER NEGOTIATED)
COMMERCIAL TERMS AND RELATED CONFIDENTIAL)
INFORMATION.)

SUNRISE COAL RESPONSES TO SECOND SET OF
REQUESTS FOR ADMISSIONS AND
DATA REQUESTS FROM CENTERPPPOINT

Request 2.1 . On page 19 of her direct testimony, Sunrise Coal witness Emily Medine states: "Alcoa will enter into a market-based metal supply agreement with Kaiser Aluminum at closing. Alcoa will continue to operate the smelter and the power plant, which together employ approximately 660 people."

a. Please provide a copy of the referenced metal supply agreement.

- b. Please provide any and all documents or other information supporting the statement that “Alcoa will continue to operate the smelter and the power plant.”
- c. Does Sunrise Coal have a contract to supply coal to the Alcoa power plant?
- d. If the answer is yes, please provide a copy of that agreement.
- e. If the answer is yes, please indicate the term of the agreement and the pricing.

Response:

- a. Neither Sunrise nor Ms. Medine have a copy of the agreement between Alcoa and Kaiser.
- b. <https://news.alcoa.com/press-releases/press-release-details/2020/Alcoa-Announces-Agreement-to-Sell-Rolling-Mill-to-Kaiser-Aluminum/default.aspx> and https://s26.q4cdn.com/375357455/files/doc_news/2021/04/20210401_Warrick_Kaiser_vf.pdf
- c. Yes.
- d. Sunrise objects to providing a copy of its coal supply agreement for the Alcoa power plant. That information is irrelevant and immaterial to any issue in this proceeding and is not likely to lead to the discovery of other admissible or discoverable information. Furthermore, it is highly sensitive and confidential commercial information. A confidentiality agreement with CenterPoint would be ineffective. Even if CenterPoint did not disclose the information, it would still know the information, which would disadvantage Sunrise in any further contract negotiations to supply CenterPoint.
- e. The current contract expires at the end of 2022. Sunrise objects to providing pricing under its coal supply agreement for the Alcoa power plant. That information is irrelevant and immaterial to any issue in this proceeding and is not likely to lead to the discovery of other admissible or discoverable information. Furthermore, it is highly sensitive and confidential commercial information. A confidentiality agreement with CenterPoint would be ineffective. Even if CenterPoint did not disclose the information, it would still know the information, which would disadvantage Sunrise in any further contract negotiations to supply CenterPoint.

As to Objections,

FROST BROWN TODD LLC

By: /s/ Robert L. Hartley

Robert L. Hartley, #7563-49
Darren A. Craig, #25534-49
Carly J. Tebelman #
201 N. Illinois St., Suite 1900
P.O. Box 44961
Indianapolis, IN 46244-0961
317-237-3800
Fax: 317-237-3900
rhartley@fbtlaw.com
dcraig@fbtlaw.com
ctebelman@fbtlaw.com

CERTIFICATE OF SERVICE

Service of the foregoing was made by electronic mail May 26, 2021, addressed to:

Jason Haas
Indiana Office of Utility Consumer
Counselor
115 W. Washington St., Suite 1500
South
Indianapolis, Indiana 46204
thaas@oucc.IN.gov
infomgt@oucc.in.gov

P. Jason Stephenson, Justin Hage, and
Heather Watts
CenterPoint Energy/Vectren
One Vectren Square
Evansville, Indiana 47708
Jason.Stephenson@centerpointenergy.com
Justin.hage@centerpointenergy.com
Heather.watts@centerpointenergy.com

Steven Krohne and Kelly Beyrer
ICE MILLER LLP
One American Square, Suite 2900
Indianapolis, IN 46282
Steven.krohne@icemiller.com
Kelly.beyrer@icemiller.com

Jennifer A. Washburn
Citizens Action Coalition
1915 West 18th Street, Suite C
Indianapolis, Indiana 46202
jwashburn@citact.org
rkurtz@citact.org

/s/ Robert L. Hartley

FROST BROWN TODD LLC
201 N. Illinois St., Suite 1900
P.O. Box 44961
Indianapolis, IN 46244-0961
317-237-3800
Fax: 317-237-3900