

OFFICIAL
EXHIBITS

FILED
August 17, 2022
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS)
POWER & LIGHT COMPANY D/B/A AES)
INDIANA PURSUANT TO IND. CODE § 8-1-)
2.5-5 FOR PARTIAL COMMISSION)
DECLINATION UNDER IND. CODE)
CHAPTER 8-1-8.5 TO ISSUE A CERTIFICATE)
OF PUBLIC CONVENIENCE AND)
NECESSITY OR OTHERWISE APPROVE A)
SOLAR GENERATION PROJECT OF)
APPROXIMATELY 375 KWac (384 KWdc))
AND ALTERNATIVE REQUEST FOR)
APPROVAL OF SAID SOLAR PROJECT AS)
CLEAN ENERGY PROJECT)

IURC
PETITIONER'S
EXHIBIT NO. 4
8-23-22 AT
DATE REPORTER

CAUSE NO. 45729

**PETITIONER'S SUBMISSION OF SUPPLEMENTAL TESTIMONY OF
C. SCOTT PERRY**

Indianapolis Power & Light Company d/b/a AES Indiana ("AES Indiana" or "Petitioner"), by counsel, in accordance with the Indiana Utility Regulatory Commission's ("Commission") August 12, 2022 docket entry in this Cause directing AES Indiana to supplement its case-in-chief on or before August 18, 2022, to comply with the Commission's General Administrative Order ("GAO") 2022-01, hereby submits the supplemental testimony of C. Scott Perry.

Respectfully submitted,

Lauren Aguilar

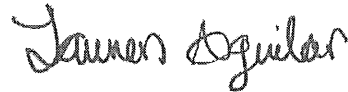
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served this 17th day of August, 2022 upon the following via electronic email, or First Class United States Mail, postage prepaid on:

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ATTORNEYS FOR PETITIONER
INDIANAPOLIS POWER & LIGHT COMPANY
D/B/A AES INDIANA

VERIFIED SUPPLEMENTAL TESTIMONY

OF

C. SCOTT PERRY

ON BEHALF OF

INDIANAPOLIS POWER & LIGHT COMPANY

D/B/A AES INDIANA

CAUSE NO. 45729

**VERIFIED SUPPLEMENTAL TESTIMONY OF C. SCOTT PERRY
ON BEHALF OF AES INDIANA**

I. INTRODUCTION

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- Q1.** Please state your name, employer, and business address.
- A1.** My name is C. Scott Perry (“Scott Perry”). I am employed by Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” or “Company”). My business address is One Monument Circle, Indianapolis, Indiana 46204.
- Q2.** What is your position with AES Indiana?
- A2.** I am Manager, Regulatory Affairs.
- Q3.** Are you the same Scott Perry that filed direct and rebuttal testimony on behalf of AES Indiana in this Cause?
- A3.** Yes.
- Q4.** Are you sponsoring any attachments?
- A4.** No.
- Q5.** What is the purpose of your supplemental testimony?
- A5.** My supplemental testimony responds to the August 12, 2022 docket entry in this Cause directing AES Indiana to supplement its case-in-chief on or before August 18, 2022 to comply with the Indiana Utility Regulatory Commission’s (“Commission”) General Administrative Order (“GAO”) 2022-01.

1 II. GAO 2022-01

2 Q6. Have you reviewed GAO 2022-01?

3 A6. Yes. GAO 2022-01 provides guidelines, effective as of August 1, 2022, for additional
4 evidence to be provided in connection with petitions regarding electric generation under
5 Indiana Code chapters 8-1-2.5, 8-1-8.5, and 8-1-8.8.

6 Q7. Please address GAO 2022-01, Section 1.

7 A7. GAO 2022-01, Section 1 applies to a petition that requests a declination of jurisdiction over
8 new electric generation whose output will be sold at wholesale. As stated in AES Indiana
9 witness Pflum's direct testimony, the Harding Street Station Solar Array ("Project") will
10 connect to AES Indiana's 13 kV distribution network.¹ The Project's output will be used in
11 providing service to retail customers and will not be sold at wholesale, rendering the
12 information requested under Section 1 of GAO 2022-01 not applicable to the Project.

13 That said, to facilitate review of this Project, AES Indiana provides the following
14 information in response to the information requested in GAO 2022-01, Section 1.

15 Table 1. AES Indiana Response to GAO 2022-01, Section 1

Line No.	Bulleted Item	AES Indiana Response
1	The name of the regional transmission organization ("RTO") to which the new generation will be connected.	The Project will not be connected to an RTO. As stated in Q/A 13 of AES Indiana witness Pflum's direct testimony, the Project will connect to AES Indiana's distribution system. AES Indiana is a member of the Midcontinent Independent System Operator ("MISO").

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¹ See AES Indiana witness Pflum Direct Testimony, Q/A 13.

2	An explanation regarding whether the new generation is required to be in the RTO's interconnection queue and, if so, its status in the queue.	As stated in line No. 1, the Project will not be connected to an RTO and is therefore not required to be in an RTO's interconnection queue.
3	A description of the new generation's expected capacity factors, dispatchability, and accreditation characteristics.	As stated in Q/A 13 of AES Indiana witness Pflum's direct testimony, the Project has an estimated capacity factor of 19.4%. As a solar generation resource, the Project is non-dispatchable. As stated in AES Indiana's response to OUC Data Request 1-7 prefiled as OUC Attachment CMA-1, p. 5, the Project will not be used as a capacity resource in an RTO market. As such, the Project will not be accredited by the RTO.
4	A description of how the new generation is expected to perform at the relevant RTO's peak pursuant to its capacity construct (for example, summer and/or winter and/or other, as may be applicable).	As stated in AES Indiana's response to OUC Data Request 1-7, prefiled as OUC Attachment CMA-1, p. 5, the Project will not receive capacity credit from MISO but may reduce AES Indiana's required capacity obligation in the MISO capacity construct, which would result in more capacity sales during periods where AES Indiana is in a long capacity position and less capacity purchases during periods where AES Indiana is in a short capacity position. When MISO implements a seasonal capacity construct, the Project is expected to reduce AES Indiana's required capacity obligation in the spring, summer, and fall seasons by roughly 50% of its installed capacity value, but to have little to no impact for the winter season.

1 Q8. Please address GAO 2022-01, Section 2.

2 A8. GAO 2022-01, Section 2 applies to a petition that requests a Certificate of Public
3 Convenience and Necessity ("CPCN") for new electric generation. To clarify, AES Indiana
4 did not file a request for the Commission to issue a CPCN under Indiana Code § 8-1-8.5.
5 As stated in my direct testimony, AES Indiana requested the Commission to decline its
6 jurisdiction in a limited manner to issue a CPCN under Section 2 of the CPCN Statute (Ind.
7 Code § 8-1-8.5-2) or its jurisdiction under Section 7 of the CPCN Statute (Ind. Code § 8-

1-8.5-7) to require approval of the Harding Street Station Solar Array as a Clean Energy Project in order for the Project to be exempt from the certification requirements.² Alternatively, as stated in my direct testimony, AES Indiana requested the Commission to find the Harding Street Station Solar Array to be reasonable and necessary and approve the Project as a Clean Energy Project so as to allow the Company to satisfy the requirement of Section 7 of the CPCN Statute that exempts this Project from the certification process.³ Therefore, AES Indiana does not believe Section 2 of GAO 2022-01 applies to the Project. That said, to facilitate review of this Project, AES Indiana provides the following information in response to the information requested in GAO 2022-01, Section 2.

Table 2. AES Indiana Response to GAO 2022-01, Section 2

Line No.	Bulleted Item	AES Indiana Response
1	The name of the RTO to which the new generation will be connected and information regarding the RTO's planning reserve margin, peaks, capacity auctions, possible ancillary services the new generation may provide, and other markets in which the new generation may participate. A qualitative assessment by the RTO regarding the new generation shall be requested and the RTO's response (including, as applicable, the RTO's affidavit or testimony) shall be part of the utility's case in chief.	See response in Table 1, line 1.

² See AES Indiana witness Perry Direct Testimony, Q/A 15.

³ See AES Indiana witness Perry Direct Testimony, Q/A 16.

2	A description of the new generation's anticipated impact on the submitting utility's resource adequacy and reliability.	As stated in Q/A 18 of AES Indiana witness Perry's Rebuttal testimony, the Project will have little impact on meeting the Company's energy and capacity needs. See also OUCC witness Armstrong's direct testimony at p. 10, lines 13-14. See also Table 1, line 4.
3	An explanation regarding whether the new generation is required to be in the RTO's interconnection queue and, if so, its status in the queue.	See response in Table 1, line 2.
4	A description of the new generation's expected capacity factors, dispatchability, and accreditation characteristics.	See response in Table 1, line 3.
5	A description of how the new generation is expected to perform at the relevant RTO's peak pursuant to its capacity construct (for example, summer and/or winter and/or other, as may be applicable).	See response in Table 1, line 4.

1 **Q9.** Please address GAO 2022-01, Section 3.

2 **A9.** GAO 2022-01, Section 3 applies to a petition that requests approval of a multi-year power
3 purchase agreement ("PPA") for electric generation in Indiana. AES Indiana's petition
4 does not request approval of a multi-year purchase power agreement. Under AES Indiana's
5 proposal, the Project will be owned and operated by AES Indiana. Therefore, AES Indiana
6 does not believe Section 3 of GAO 2022-01 applies to the Project.

7 That said, to facilitate review of this Project, AES Indiana provides the following
8 information in response to the information requested in GAO 2022-01, Section 3.

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Table 3. AES Indiana Response to GAO 2022-01, Section 3

Line No.	Bulleted Item	AES Indiana Response
1	The name of the RTO to which the generation will be connected.	See response in Table 1, line 1.
2	A description of the new generation's anticipated impact on the submitting utility's resource adequacy and reliability.	See response in Table 2, line 2.
3	An explanation regarding whether the generation is required to be in the RTO's interconnection queue and, if so, its status in the queue.	See response in Table 1, line 2.
4	A description of the generation's expected capacity factors, dispatchability, and accreditation characteristics.	See response in Table 1, line 3.
5	A description of how the generation is expected to perform at the relevant RTO's peak pursuant to its capacity construct (for example, summer and/or winter and/or other, as may be applicable).	See response in Table 1, line 4.

2 Q10. Does this supplemental information change the Company's direct or rebuttal
 3 evidence or workpapers?

4 A10. No.

5 **III. CONCLUSION**

6 Q11. Does this conclude your pre-filed supplemental testimony?

7 A11. Yes.

VERIFICATION

I, C. Scott Perry, Manager, Regulatory Affairs, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information, and belief.

Dated: August 16, 2022


C. Scott Perry