FILED February 10, 2021 INDIANA UTILITY REGULATORY COMMISSION

# STATE OF INDIANA INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANA GAS COMPANY, INC. D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC. ("VECTREN NORTH") FOR (1) AUTHORITY TO MODIFY ITS RATES AND CHARGES FOR GAS UTILITY SERVICE THROUGH A PHASE-IN OF RATES, (2) APPROVAL OF NEW SCHEDULES OF RATES AND CHARGES, AND NEW AND REVISED RIDERS, (3) APPROVAL OF A NEW TAX SAVINGS CREDIT RIDER, (4) APPROVAL OF VECTREN NORTH'S ENERGY EFFICIENCY PORTFOLIO OF PROGRAMS AND AUTHORITY TO EXTEND PETITIONER'S ENERGY EFFICIENCY RIDER ("EER"), INCLUDING THE DECOUPLING MECHANISM EFFECTUATED THROUGH THE EER, (5) APPROVAL OF REVISED DEPRECIATION RATES APPLICABLE TO GAS PLANT IN SERVICE, (6) APPROVAL OF NECESSARY AND APPROPRIATE ACCOUNTING RELIEF, AND (7) APPROVAL OF AN ALTERNATIVE REGULATORY PLAN PURSUANT	CAUSE NO. 45468
113 CUSTOWER DILL ASSISTANCE PROGRAMS.	1

# NOTICE OF SUBSTITUTION OF WITNESS

INDIANA GAS COMPANY, INC. D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC., a CenterPoint Energy Company ("Petitioner" or "Vectren North"), by counsel, hereby notifies the Commission and the parties that Mr. Brett A. Jerasa is being substituted for and is adopting the direct testimony previously prefiled by Vectren North witness Robert McRae. Vectren North advises that the relevant portions of the originally prefiled testimony have been revised to reflect this substitution as shown in the attached redline copies. In addition, certain pages of Vectren North's prefiled direct testimony and Petitioner's Exhibits No. 18 and 19 are being revised to reflect the witness substitution as shown in the attached redlined pages. Clean copies of the revised pages are attached hereto and will be offered into evidence at the hearing. Revised Petitioner's Exhibit No.

18 is filed herewith in Excel format.

Respectfully submitted,

/s/ Hillary J. Close\_

Justin Hage (Atty. No. 33785-32) Heather A. Watts (Atty. No. 35482-82) Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of Indiana, Inc., a CenterPoint Energy Company One Vectren Square Evansville, IN 47708 Mr. Hage's Direct Dial: (317) 260-5399 Ms. Watts' Direct Dial: (812) 491-5119 Facsimile: (812) 491-4238 E-mail: Justin.Hage@centerpointenergy.com Heather.Watts@centerpointenergy.com

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Attorneys for Petitioner Indiana Gas Company, Inc. d/b/a/ Vectren Energy Delivery of Indiana, Inc.

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served this 10th

day of February, 2021, electronically upon:

Lorraine Hitz-Bradley Scott Franson Randall Helmen Heather Poole Office of Utility Consumer Counselor PNC Center 115 W. Washington Street, #1500 South Indianapolis, Indiana 46204 infomgt@oucc.in.gov Ihitzbradley@oucc.in.gov sfranson@oucc.in.gov rhelmen@oucc.in.gov hpoole@oucc.in.gov Copy to: datherton@oucc.in.gov

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Courtesy copy to: Robert K. Johnson, Esq. 2454 Waldon Dr. Greenwood, IN 46143 rjohnson@utilitylaw.us Tabitha Balzer Todd Richardson Lewis & Kappes, P.C. One American Square, Suite 2500 Indianapolis, IN 46282 <u>TBalzer@lewis-kappes.com</u> <u>TRichardson@lewis-kappes.com</u> Copy to: <u>ATyler@lewis-kappes.com</u> ETennant@lewis-kappes.com

Jonathan B. Turpin Locke Lord LLP 111 South Wacker Drive, #4100 Chicago, IL 60606 jonathan.turpin@lockelord.com

<u>/s/ Hillary J. Close</u> Hillary J. Close

DMS 19149011v1

	Cause No. 45468 Petitioner's Exhibit No. Vectren Nort	
I	REVISED Page 14 of 2	
1	Mr. Brett A. Jerasa, Director, Assistant Treasurer, presents the components of th	e <
2	Company's capital structure and the reasonableness of their projected balances an	d
3	weighting. In addition, he will support the Company's proposed cost of debt.	
4		
5	Ms. Rina H. Harris, Director, Energy Efficiency will present testimony in support of th	е
6	extension of the Company's energy efficiency programs. She will discuss the role an	d
7	results of Vectren's 2022-2025 Market Potential Study and Action Plan; briefly discus	s
8	Vectren's current and proposed natural gas energy efficiency initiatives; and discus	s
9	the reasons why continuation of natural gas energy efficiency programs is in the publi	с
10	interest.	
11		
12	Ms. Teresa J. Cullum, Supervisor, Credit and Collections will provide testimony i	n
13	support of our continuation of the Universal Service Program.	
14		
15	Mr. Russell A. Feingold, Vice President with Black & Veatch Management Consulting	<b>]</b> ,
16	LLC will present the results of the Cost of Service study, rate design, and discuss it	s
17	effect on rates.	
18		
19	Ms. Katie J. Tieken, Manager, Regulatory and Rates, will sponsor the proposed rate	s
20	within the Tariff; implementation of Phase 1 and Phase 2 rates; the Company's reques	st
21	to continue decoupling and Universal Service Program; and proposals associated wit	h
22	new and existing adjustment mechanisms.	
23		

Deleted: Robert B. McRae Deleted: Vice President and

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2	Company's capital structure and the reasonableness of their projected balances and
3	weighting. In addition, he will support the Company's proposed cost of debt.
4	
5	Ms. Rina H. Harris, Director, Energy Efficiency will present testimony in support of the
6	extension of the Company's energy efficiency programs. She will discuss the role and
7	results of Vectren's 2022-2025 Market Potential Study and Action Plan; briefly discuss
8	Vectren's current and proposed natural gas energy efficiency initiatives; and discuss
9	the reasons why continuation of natural gas energy efficiency programs is in the public
10	interest.
11	
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13	support of our continuation of the Universal Service Program.
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20	within the Tariff; implementation of Phase 1 and Phase 2 rates; the Company's request
21	to continue decoupling and Universal Service Program; and proposals associated with
22	new and existing adjustment mechanisms.
23	

	Caus	se No. 45468	Petitioner's Exhibit No. 2 Vectren North <u>REVISED</u> Page 6 of 43	
1		System Improvement Charge ("TDSIC") proceedings, Caus	se No. 44910; its Electric	
2		Environmental Cost Adjustment ("ECA") proceeding, Cat	use No. 45052; its Fuel	
3		Adjustment Clause ("FAC") proceedings, Cause No. 38708	; and its Electric Demand	
4		Side Management ("DSM") Plan proceeding, Cause No. 45	387. I have also testified	
5		before the Commission on behalf of Vectren North in its GC/	A proceedings, Cause No.	
6		37394. I have also provided testimony on behalf of Vectren	South in its most recently	
7		filed general gas rate case proceeding under IURC Cause N	lo. 45447.	
8				
9	Q.	What is the purpose of your testimony in this proceeding	g?	
10	Α.	The purpose of my testimony is to present: (i) the financia	al and accounting data in	
11		support of Vectren North's revenue requirement; (ii) an expl	anation of the Company's	
12		decision to use a forecasted 2021 test year for ratemaking	purposes, along with the	
13		budgeting and forecasting process used for the test year;	(iii) the proposed update	
14		process for Phase 2 rates; (iv) the pro forma adjustments	to the test year; (v) the	
15		determination of rate base; and (vi) certain elements of the c	apital structure presented	
16		by Petitioner's Witness <u>Brett A. Jerasa</u> .		Deleted: Robert B. McRae
17				
18	Q.	Are you sponsoring any of the Revenue Requirement	Schedules provided in	
19		Petitioner's Exhibit No. 18 in this proceeding?		
20	Α.	Yes. Within the financial schedules included in Petitione	<u>r's Exhibit No. 18</u> , I am	
21		specifically sponsoring or co-sponsoring the revenue req	uirement and supporting	
22		calculations within Schedules A (Revenue Increase a	nd Financial Summary),	
23		Schedules B (Rate Base), and Schedules C (Income Stat	ement and Adjustments).	
24		Petitioner's Witnesses Jerasa will sponsor and support	Schedules D (Capital	Deleted: McRae
25		Structure) and Russell A. Feingold and Katie J. Tieken will s	ponsor and support	

	Caus		etitioner's Exhibit No. 2 Vectren North REVISED Page 8 of 43		
1	A.	Yes, they were.	0		
2					
3	Q.	Are the Company's books and records kept in accordance	with the Federal		
4		Energy Regulatory Commission ("FERC") Uniform System	of Accounts		
5		("USoA") and generally accepted accounting principles ("	GAAP")?		
6	Α.	Yes. The Company's books and records are kept in accor	dance with the FERC		
7		Uniform System of Accounts as adopted by this Commission a	nd GAAP.		
8					
9					
10	II.	REVENUE REQUIREMENT			
11					
12	Q.	What is the revenue increase requested by Vectren North?	,		
13	Α.	As reflected on Schedule A-1, the Company seeks a tota	I revenue increase of		
14		\$20,759,200 utilizing a projected test year for calendar year	2021 and rate base,		
15		capital structure balances and costs projected as of Decen	ber 31, 2021. This is		
16		necessary to allow the Company to earn a fair and reasonable	eturn on its investment		
17		at a recommended return on equity of 10.15 percent. The re	commended return on		
18		equity as detailed in Schedule D-1 is supported in the testimony	of Petitioner's Witness		
19		Ann E. Bulkley and is set forth in the capital structure (Sched	ule D-1) sponsored by		
20		Petitioner's Witness <u>Jerasa</u> .		<b>Deleted:</b> McRae	
21					
22	Q.	Why is Vectren North seeking rate relief in this proceeding	l?		
23	<u>A.</u>	Specifically, Ind. Code Ch. 8-1-39 ("TDSIC Statute") requires t	hat the Company file a		
24		base rate case prior to the completion of a 7-year plan under	the TDSIC Statute. In		
25		consolidated Cause Nos. 44429 and 44430, the Company sou	ght and received		

I		Caus		Petitioner's Exhibit No. 2 Vectren North <u>REVISED</u> Page 27 of 43	
	1		within Schedule E-4 is based on the rates submitted as	part of Vectren North's	
	2		proposed tariff supported by Petitioner's Witness Feingold.	By adjusting the current	
	3		adjusted operating income statement by the impact of the	e proposed rates, this	
	4		schedule shows that the Company's rate of return will increas	e to 6.32 percent, which	
	5		is the requested Rate of Return reflected on Schedule	D-1 and discussed by	
1	6		Petitioner's Witnesses Jerasa and Bulkley.		 Deleted: McRae
I	7				
	8	Q.	Please describe Schedule C-1.1.		
	9	Α.	Schedule C-1.1 presents a more detailed view of the pro for	orma income statement,	
	10		through net operating income, for the twelve months ende	d December 31, 2021.	
	11		Column A presents the unadjusted income statement, by FER	C Account, for the 2021	
	12		budget as supported by Petitioner's Witness Moore. Column	n B summarizes the pro	
	13		forma adjustments required to the test year. These pro forma	adjustments are detailed	
	14		within the various C-3 schedules I will discuss later in	my testimony. These	
	15		adjustments are numbered sequentially starting with Sch	edule C-3.1, by FERC	
	16		Account, on the far side of Schedule C-1.1. Column C then r	epresents the pro forma	
	17		income statement at present rates. Column D captures the rev	enue increase, as noted	
	18		on Schedule C-1, to arrive at the pro forma at proposed	rates income statement	
	19		presented in Column E.		
	20				
	21	Q.	In your opinion, does Schedule C-1.1, Column E accu	rately reflect Vectren	
	22		North's projected operating results during the test y	ear, with appropriate	
	23		adjustments?		

24 25 Α.

Yes.

Cause No. 45468

Petitioner's Exhibit No. 2 Vectren North <u>REVISED</u> Page 41 of 43

1

#### Q. Please describe Schedules C-3.23 and C-3.24.

2 Α. Schedules C-3.23 and C-3.24 are calculations of the Indiana state and federal income 3 taxes for the pro forma adjusted test year. Indiana state income taxes are calculated in detail on Schedule C-4, sponsored by Petitioner's Witness Brenda L. Musser. The 4 statutory rate utilized for the Indiana income taxes is 4.90 percent, reflecting the rate 5 6 expected to be effective July 1, 2021. Schedule C-4 captures the impact of the change 7 in the state income tax rate during the test year from the level utilized to determine 8 income tax expense in the unadjusted budget. Federal income taxes are calculated 9 in detail on Schedule C-5, also sponsored by Petitioner's Witness Musser. The current 10 statutory rate utilized for the federal income taxes is 21 percent, which is unchanged from the rate utilized for the test year. The pro forma level of state and federal income 11 12 tax expense is compared to the test year unadjusted tax expense to determine the required adjustment. As all of the adjustments to revenue and operating expenses 13 14 also include state and federal income tax impacts, the net adjustment shown on 15 Schedules C-3.23 and C-3.24 excludes all adjustments already reflected to the test 16 year income tax expense.

17 18

19 VIII. <u>D SCHEDULES</u>

20

#### 21 Q. Please describe Schedule D-1.

22	Α.	Schedule D-1 reflects the calculation of the overall rate of return summary which is
23		based on the forecasted capital structure at December 31, 2021. This is sponsored
24		by Petitioner's Witness Jerasa, who also discusses how the forecasted balances for
25		long-term debt and common equity were determined for December 31, 2021.

Deleted: McRae

ı		Cause		titioner's Exhibit No. 2 Vectren North	
I	1		<u>Ke</u>	VISED Page 42 of 43	
	1 2	Q.	Has Vectren North adjusted the capital structure compor	ants from how it is	
	2	ч.	presented in its semi-annual CSIA proceedings in Cause No		
	4	A.	Yes. The Company has included prepaid pension asset as a co		
	5		structure which is an offset to zero cost capital. This methodol	ogy is consistent with	
	6		previous rulings made by the Commission in Cause No. 45029 a	and Cause No. 44688.	
ĺ	7		Petitioner's Witness Jerasa discusses in further detail Vectre	n North's proposal to	Deleted: McRae
ļ	8		include the prepaid pension asset in the capital structure within	this proceeding.	
	9				
	10	Q.	Are there components of Vectren North's capital structure	e that have not been	
	11		projected to December 31, 2021?		
	12	А.	Yes. On Schedule D-5, Customer Advances for Construction and	nd Customer Deposits	
	13		are held constant as of December 31, 2019, with no proje	ected assumptions or	
	14		estimates to include for the projected test year for 2021. This is	is consistent with how	
	15		the Company currently budgets, with these items not discretely for	orecasted for changes	
	16		on the projected balance sheet.		
	17				
	18	Q.	How did the Company forecast the test year balance of Inv	estment Tax Credits	
	19		("ITC")?		
	20	A.	The Company used the year-end balance as of December 31, 2	019 as a starting point	
	21		then projected activity associated with amortizations of the balan	ce through December	
	22		31, 2021 to arrive at the projected level of ITC included in the ca	apital structure.	
	23				

24

System Improvement Charge ("TDSIC") proceedings, Cause No. 44910; its Electric
Environmental Cost Adjustment ("ECA") proceeding, Cause No. 45052; its Fuel
Adjustment Clause ("FAC") proceedings, Cause No. 38708; and its Electric Demand
Side Management ("DSM") Plan proceeding, Cause No. 45387. I have also testified
before the Commission on behalf of Vectren North in its GCA proceedings, Cause No.
37394. I have also provided testimony on behalf of Vectren South in its most recently
filed general gas rate case proceeding under IURC Cause No. 45447.

8

#### 9 Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to present: (i) the financial and accounting data in support of Vectren North's revenue requirement; (ii) an explanation of the Company's decision to use a forecasted 2021 test year for ratemaking purposes, along with the budgeting and forecasting process used for the test year; (iii) the proposed update process for Phase 2 rates; (iv) the pro forma adjustments to the test year; (v) the determination of rate base; and (vi) certain elements of the capital structure presented by Petitioner's Witness Brett A. Jerasa.

17

# Q. Are you sponsoring any of the Revenue Requirement Schedules provided in Petitioner's Exhibit No. 18 in this proceeding?

A. Yes. Within the financial schedules included in <u>Petitioner's Exhibit No. 18</u>, I am
 specifically sponsoring or co-sponsoring the revenue requirement and supporting
 calculations within **Schedules A** (Revenue Increase and Financial Summary),
 **Schedules B** (Rate Base), and **Schedules C** (Income Statement and Adjustments).
 Petitioner's Witnesses Jerasa will sponsor and support **Schedules D** (Capital
 Structure) and Russell A. Feingold and Katie J. Tieken will sponsor and support

1	Α.	Yes, they were.
2		
3	Q.	Are the Company's books and records kept in accordance with the Federal
4		Energy Regulatory Commission ("FERC") Uniform System of Accounts
5		("USoA") and generally accepted accounting principles ("GAAP")?
6	Α.	Yes. The Company's books and records are kept in accordance with the FERC
7		Uniform System of Accounts as adopted by this Commission and GAAP.
8		
9		
10	II.	REVENUE REQUIREMENT
11		
12	Q.	What is the revenue increase requested by Vectren North?
13	Α.	As reflected on Schedule A-1, the Company seeks a total revenue increase of
14		\$20,759,200 utilizing a projected test year for calendar year 2021 and rate base,
15		capital structure balances and costs projected as of December 31, 2021. This is
16		necessary to allow the Company to earn a fair and reasonable return on its investment
17		at a recommended return on equity of 10.15 percent. The recommended return on
18		equity as detailed in Schedule D-1 is supported in the testimony of Petitioner's Witness
19		Ann E. Bulkley and is set forth in the capital structure (Schedule D-1) sponsored by
20		Petitioner's Witness Jerasa.
21		
22	Q.	Why is Vectren North seeking rate relief in this proceeding?
23	Α.	Specifically, Ind. Code Ch. 8-1-39 ("TDSIC Statute") requires that the Company file a
24		base rate case prior to the completion of a 7-year plan under the TDSIC Statute. In
25		consolidated Cause Nos. 44429 and 44430, the Company sought and received

within Schedule E-4 is based on the rates submitted as part of Vectren North's
proposed tariff supported by Petitioner's Witness Feingold. By adjusting the current
adjusted operating income statement by the impact of the proposed rates, this
schedule shows that the Company's rate of return will increase to 6.32 percent, which
is the requested Rate of Return reflected on Schedule D-1 and discussed by
Petitioner's Witnesses Jerasa and Bulkley.

7

8

# Q. Please describe Schedule C-1.1.

9 Α. Schedule C-1.1 presents a more detailed view of the pro forma income statement, 10 through net operating income, for the twelve months ended December 31, 2021. 11 Column A presents the unadjusted income statement, by FERC Account, for the 2021 12 budget as supported by Petitioner's Witness Moore. Column B summarizes the pro 13 forma adjustments required to the test year. These pro forma adjustments are detailed 14 within the various C-3 schedules I will discuss later in my testimony. These 15 adjustments are numbered sequentially starting with Schedule C-3.1, by FERC 16 Account, on the far side of Schedule C-1.1. Column C then represents the pro forma 17 income statement at present rates. Column D captures the revenue increase, as noted 18 on Schedule C-1, to arrive at the pro forma at proposed rates income statement 19 presented in Column E.

20

Q. In your opinion, does Schedule C-1.1, Column E accurately reflect Vectren
 North's projected operating results during the test year, with appropriate
 adjustments?

24 A. Yes.

25

1 Q. Please describe Schedules C-3.23 and C-3.24.

2 Α. Schedules C-3.23 and C-3.24 are calculations of the Indiana state and federal income 3 taxes for the pro forma adjusted test year. Indiana state income taxes are calculated 4 in detail on Schedule C-4, sponsored by Petitioner's Witness Brenda L. Musser. The 5 statutory rate utilized for the Indiana income taxes is 4.90 percent, reflecting the rate 6 expected to be effective July 1, 2021. Schedule C-4 captures the impact of the change 7 in the state income tax rate during the test year from the level utilized to determine 8 income tax expense in the unadjusted budget. Federal income taxes are calculated 9 in detail on Schedule C-5, also sponsored by Petitioner's Witness Musser. The current 10 statutory rate utilized for the federal income taxes is 21 percent, which is unchanged 11 from the rate utilized for the test year. The pro forma level of state and federal income 12 tax expense is compared to the test year unadjusted tax expense to determine the 13 required adjustment. As all of the adjustments to revenue and operating expenses 14 also include state and federal income tax impacts, the net adjustment shown on 15 Schedules C-3.23 and C-3.24 excludes all adjustments already reflected to the test 16 year income tax expense.

- 17
- 18

# 19 VIII. <u>D SCHEDULES</u>

20

# 21 Q. Please describe Schedule D-1.

A. Schedule D-1 reflects the calculation of the overall rate of return summary which is
 based on the forecasted capital structure at December 31, 2021. This is sponsored
 by Petitioner's Witness Jerasa, who also discusses how the forecasted balances for
 long-term debt and common equity were determined for December 31, 2021.

1

2	Q.	Has Vectren North adjusted the capital structure components from how it is
3		presented in its semi-annual CSIA proceedings in Cause No. 44430?
4	A.	Yes. The Company has included prepaid pension asset as a component of the capital
5		structure which is an offset to zero cost capital. This methodology is consistent with
6		previous rulings made by the Commission in Cause No. 45029 and Cause No. 44688.
7		Petitioner's Witness Jerasa discusses in further detail Vectren North's proposal to
8		include the prepaid pension asset in the capital structure within this proceeding.
9		
10	Q.	Are there components of Vectren North's capital structure that have not been
11		projected to December 31, 2021?
12	A.	Yes. On Schedule D-5, Customer Advances for Construction and Customer Deposits
13		are held constant as of December 31, 2019, with no projected assumptions or
14		estimates to include for the projected test year for 2021. This is consistent with how
15		the Company currently budgets, with these items not discretely forecasted for changes
16		on the projected balance sheet.
17		
18	Q.	How did the Company forecast the test year balance of Investment Tax Credits
19		("ITC")?
20	A.	The Company used the year-end balance as of December 31, 2019 as a starting point
21		then projected activity associated with amortizations of the balance through December
22		31, 2021 to arrive at the projected level of ITC included in the capital structure.
23		
24		

	Cau	use No. 45468	Petitioner's Exhibit No. 11 Vectren North <u>REVISED</u> Page 14 of 15	
1	Q.	Were any adjustments made to the ADIT balance?		
2	A.	Yes. ASC 740 requires deferred income taxes to be	recorded on the difference	
3		between the tax basis of assets and liabilities and the b	ook basis at which they are	
4		carried in the financial statements. ASC 980-740-25 requ	ires regulated enterprises to	
5		recognize deferred taxes on temporary differences the	at are, at the direction of	
6		regulatory authorities, flowed through to the custome	ers' benefit for ratemaking	
7		purposes and for the equity component of the allowa	nce for funds used during	
8		construction. Regulated enterprises are also required to	recognize regulatory assets	
9		and liabilities for the effect of future revenues expected to	be realized as the tax effects	
10		of these temporary differences reverse. Consistent w	ith prior rate cases and for	
11		simplicity of presentation, these regulatory assets and	liabilities have been netted	
12		against the deferred income tax liability. The result is a d	deferred income tax balance	
13		included in the capitalization, which is on the same basis a	s that recognized in previous	
14		cases.		
15				
16	Q.	How is ADIT reflected in filing schedules of this proc	eeding?	
17	A.	The pro-forma ADIT balance has been incorporated a	s a component of cost-free	
18		capital on Petitioner's Exhibit No. 18, Schedule D-5 spons	ored by Petitioner's Witness	
19		Brett A. Jerasa.		Deleted: Robert B. McRae
20				
21				
22	IV.	OTHER INCOME TAX RELATED COST OF CAPITAL I	<u>rems</u>	
23				
24	Q.	Please discuss the EDIT included in cost free capital.		
25	A.	As I previously stated, federal EDIT is currently being refu	nded in the Company's CSIA	

I

### 1 Q. Were any adjustments made to the ADIT balance?

2 Α. Yes. ASC 740 requires deferred income taxes to be recorded on the difference 3 between the tax basis of assets and liabilities and the book basis at which they are 4 carried in the financial statements. ASC 980-740-25 requires regulated enterprises to 5 recognize deferred taxes on temporary differences that are, at the direction of 6 regulatory authorities, flowed through to the customers' benefit for ratemaking 7 purposes and for the equity component of the allowance for funds used during 8 construction. Regulated enterprises are also required to recognize regulatory assets 9 and liabilities for the effect of future revenues expected to be realized as the tax effects 10 of these temporary differences reverse. Consistent with prior rate cases and for 11 simplicity of presentation, these regulatory assets and liabilities have been netted 12 against the deferred income tax liability. The result is a deferred income tax balance 13 included in the capitalization, which is on the same basis as that recognized in previous 14 cases.

15

# 16 Q. How is ADIT reflected in filing schedules of this proceeding?

- A. The pro-forma ADIT balance has been incorporated as a component of cost-free
  capital on <u>Petitioner's Exhibit No. 18</u>, Schedule D-5 sponsored by Petitioner's Witness
  Brett A. Jerasa.
- 20
- 21

# 22 IV. OTHER INCOME TAX RELATED COST OF CAPITAL ITEMS

23

# 24 Q. Please discuss the EDIT included in cost free capital.

A. As I previously stated, federal EDIT is currently being refunded in the Company's CSIA

Petitioner's Exhibit No. 13 Vectren North <u>REVISED</u>Page 1 of 15

#### INDIANA GAS COMPANY, INC.

d/b/a VECTREN ENERGY DELIVERY OF INDIANA, INC.

#### A CENTERPOINT ENERGY COMPANY

(VECTREN NORTH)

**IURC CAUSE NO. 45468** 

DIRECT TESTIMONY

OF

## BRETT A. JERASA

DIRECTOR, ASSISTANT TREASURER

Deleted: ROBERT B. MCRAE¶ VICE PRESIDENT AND TREASURER¶

ON

**Y**\_\_\_\_\_

CAPITAL STRUCTURE AND COST OF DEBT

Petitioner's Exhibit No. 13 Vectren North Page 2 of 15

#### **Glossary of Acronyms**

CenterPoint	CenterPoint Energy, Inc.
Company	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of
	Indiana, Inc.
FSA	Financial Services Agreement
IURC or Commission	Indiana Utility Regulatory Commission
Petitioner	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of
	Indiana, Inc.
Service Company	CenterPoint Energy Service Company, LLC
Vectren	Vectren Corporation
Vectren North	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of
	Indiana, Inc.
Vectren South	Southern Indiana Gas and Electric Company d/b/a Vectren
	Energy Delivery of Indiana, Inc.
Vectren Ohio	Vectren Energy Delivery of Ohio, Inc.
VUHI	Vectren Utility Holding, Inc.

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		Petitioner's Exhibit No. 13 Vectren North <u>REVISED</u> Page 4 of 15 DIRECT TESTIMONY OF <u>BRETT A. JERASA</u>	Deleted: 1
			Deleted: ROBERT B. MCRAE
1 2	I.	INTRODUCTION	
3	Q.	Please state your name and business address.	
4	A.	My name is Brett A. Jerasa, My business address is 1111 Louisiana St, Houston, TX_	Deleted: Robert Bruce McRae
5		77002.	
6			
7	Q.	By whom are you employed?	
8	A.	I am employed by CenterPoint Energy Service Company, LLC ("Service Company"),	
9		a wholly-owned subsidiary of CenterPoint Energy, Inc. ("CenterPoint"). The Service	
10		Company provides centralized support services to CenterPoint's operating units,	
11		which includes Vectren Corporation ("Vectren"), a wholly-owned subsidiary of	
12		CenterPoint.	
13			
14	Q.	On whose behalf are you testifying in this proceeding?	
15	A.	I am testifying on behalf of Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery	
16		of Indiana, Inc. ("Petitioner", "Vectren North" or "the Company"), which is a subsidiary	
17		of Vectren.	
18			
19	Q.	What is your role with respect to Petitioner Vectren North?	
20	A.	I am Director, Assistant Treasurer for CenterPoint, the ultimate parent company of	Deleted: Vice President and
21		Vectren North. I have the same role with two other utility subsidiaries of Vectren -	
22		Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana,	
23		Inc. ("Vectren South") and Vectren Energy Delivery of Ohio, Inc. ("Vectren Ohio").	

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1			
2	Q.	Please describe your educational background.	
3	Α.	I have a Bachelor of Arts in Economics from the University of Virginia, a Master of Arts	
4		in History from Old Dominion University, and a Master of Business Administration from	Deleted: I have a Bachelor of Science in Management from Brigham Young University
5		Indiana University's Kelley School of Business.	
6			
7	Q.	Please describe your professional experience.	
8	Α.	I have been employed by CenterPoint since 2012 and have held various positions	
9		within the company. From 2011 to 2015, I was a lead analyst in the Corporate Strategic	
10		Planning group responsible for assisting various business units and functions with the	
11		creation of their strategic plans and capital project evaluation. Since 2015 I have	
12		worked in the Treasury group, first as a Treasury Manager responsible for the	
13		administration and operations of CenterPoint's various pension, savings and benefit	
14		plans and Capital Markets activities. In 2020, I was promoted to Director, Assistant	
15		Treasurer and have responsibilities for the Company's capital markets, debt	
16		compliance, treasury operations and investments.	Deleted: 2011 and have held various positions within the company. From 2011 to 2012, I was a lead analyst in the
17			Corporate Strategic Planning group responsible for assisting various business units and functions with the creation of their strategic plans. From 2012 to 2015 I was a
18	Q.	Provide some specific examples of activities you have undertaken during your	manager in the Investor Relations group where I was responsible for communicating financial, strategic, and
19		time in the Treasury department.	operational information to existing and prospective investors and research analysts. Since 2015 I have worked in the Treasury group.
20	Α.	I have managed the debt service and compliance of more than \$14 billion of external	Deleted: 5
21		debt, led 16 external bond offerings aggregating \$6,0 billion, led two (2) external	( Deleted: 5
22		offerings aggregating \$1.7 billion of equity hybrid securities, among other things.	Deleted: 7
22			Deleted: multiple
23			Deleted: transactions regarding CenterPoint and its subsidiaries' \$5.1 billion credit agreements, co-led a \$5 billion Bridge facility syndication
24	Q.	What are your present duties and responsibilities as <b>Director</b> , Assistant	
25		"Treasurer?	Deleted: Vice President and

1		Vectren North <u>REVISED</u> Page 6 of 15		
1	A.	I am responsible for the short-term and long-term financing activities of CenterPoint		
2		and its subsidiaries, including Vectren North. This includes having responsibility for		
3		cash management, bank relations, short-term borrowings, long-term capital financing,		
4		credit rating agency relations and a variety of other finance-related activities. I am		
5		responsible for arranging the corporate financings and bank credit facilities for		
6		CenterPoint and its utility subsidiaries,	[	<b>Deleted:</b> all Treasury functions of CenterPoint and its subsidiaries, including Vectren, the parent company of
7				Vectren North. Treasury includes all short-term and long- term financing, short-term investing, cash management,
8	Q.	Have you ever testified before any state regulatory commission?		pension and savings plan administration, banking relationships, and rating agency relationships. In addition, I am responsible for the credit risk function of CenterPoint
9	A.	Yes. I have testified before the Indiana Utility Regulatory Commission ("IURC" or "the	L	and CenterPoint Energy Houston Electric, LLC.
10		Commission") on behalf of Vectren North and Vectren South in its most recently filed	[	<b>Deleted:</b> South in its most recently filed general gas rate case proceeding, Cause No. 45447. Additionally, I have
11		financing proceeding, Cause Nos. 45457 and 45458.		testified on behalf of CenterPoint Energy Houston Electric, LLC in dockets 48226 and 49421 and on behalf of
12			l	CenterPoint Energy Minnesota Gas in dockets G-008/GR- 17-285 and G-008/GR-19-524.
13	Q.	What is the purpose of your testimony in this proceeding?		
14	Α.	My testimony will provide an overview of the components of Vectren North's capital		
15		structure and its weighted average cost of capital.		
16				
17	Q.	Are you sponsoring any attachments in this proceeding?		
18	A.	Yes. I am sponsoring the following attachments in this proceeding:		
19		• The D Schedules of Petitioner's Exhibit No. 18, Capital Structure and Cost of		
20		Capital		
21				
22	Q.	Were these schedules prepared by you or under your supervision?		
23	A.	Yes, they were.		

Petitioner's Exhibit No. 13

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1	П.	CAPITAL STRUCTURE
2		
3	Q.	What topics do you discuss in this section of your testimony?
4	Α.	In this part of my testimony I explain the importance of establishing a capital structure
5		that will help preserve the financial integrity of the Company, thereby allowing it to
6		maintain access to capital on reasonable terms in all market conditions. Next, I
7		describe the Company's projected capital structure for the test year and I explain why
8		that capital structure is reasonable.
9		
10	Q.	What does the phrase "capital structure" mean in the context of utility
11		ratemaking?
12	A.	"Capital structure" refers to the percentages of debt and equity used to finance the
13		assets and perform the operations necessary to provide service to customers. The
14		primary sources of capital to finance long-term assets of the Company are long-term
15		debt and common equity. Capital structure is typically expressed in terms of the ratio
16		of a particular type of capital to total capital. Thus, for example, a utility with a total
17		capitalization of \$1 billion, long-term debt of \$450 million, and common equity of \$550
18		million would have a capital structure composed of $45\%$ long-term debt and $55\%$
19		common equity.
20		
21	Q.	Are there other capital structure components other than investor provided debt
22		and equity used to determine Vectren North's requested capital structure?
23	A.	Yes. In addition to investor provided debt and equity, there are several additional
24		components included in the regulatory capital structure calculation such as customer
25		deposits, accumulated deferred income taxes, prepaid pension and investment tax

Petitioner's Exhibit No. 13 Vectren North Page 8 of 15

1		credits. Petitioner's Exhibit No. 18, Schedule D-1 details all of the components used
2		to calculate the Company's requested capital structure.
3		
4	Q.	Why does a utility finance its assets and operations with different types of
5		capital?
6	Α.	A utility typically uses different types of capital because the various elements of capital
7		have different risks, and, hence, different costs. Debt is less risky than equity because
8		debt holders are senior to equity holders in terms of having a claim on the utility's
9		assets, and for that reason debt is generally cheaper than equity. Additionally, income
10		tax deductibility of interest expense, in contrast with the non-deductibility of most types
11		of cash dividends, further reduces the after-tax cost of debt capital. As a utility
12		increases the proportion of debt in its capital structure, however, lenders increasingly
13		demand higher returns to offset the risk of default. Utilities and other companies
14		therefore try to strike a balance that will provide dependable access to capital in a cost-
15		effective manner.

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# I

1 **Q**.

2

3

#### What is the forecasted capital structure for this case?

A. Table <u>BAJ</u>-1 below details the Company's forecasted capital structure.

Table BAJ-1Long-Term Debt36.88%Preferred Stock0.00%Common Equity46.22%Cost Free Capital15.29%Other Capital1.61%Total Capital100.00%

4

5	Q.	What investor provided capital structure is reflected in the Company's
6		forecasted capital structure?
7	A.	As is detailed in workpapers to Petitioner's Exhibit No. 18, D Schedules, WPD-1.1, the
8		investor provided capital structure consists of 44.38% long-term debt and 55.62%
9		common equity. This reflects a projected capital structure and will be updated to actual
10		as of June 30, 2021 for Phase 1 rates, and actual as of December 31, 2021 for Phase
11		2 rates, as discussed by Petitioner's Witness Angie M. Bell.
12		
13	Q.	Does the Company directly issue equity into the external capital markets?
14	A.	No, the sources of the equity on the Company's balance sheet are: (1) equity
15		contributions from Vectren Utility Holdings, Inc. ("VUHI"); and (2) retained earnings
16		from operations. The Company may make periodic dividend payments to VUHI to
17		ensure that the Company's equity ratio remains within a reasonable range, and VUHI
18		may make equity contributions to the Company for the same purpose. VUHI, in turn,
19		obtains equity financing ultimately from CenterPoint.

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Deleted: RBM

Petitioner's Exhibit No. 13 Vectren North Page 10 of 15

1	Q.	Does the Company issue debt into the external capital markets?
2	Α.	In the past, the Company did issue debt in the public or private debt capital markets,
3		however today all of its debt capital is issued to VUHI.
4		
5	Q.	Are there any forecasted debt issuances included in Vectren North's investor
6		provided capital structure during the test year?
7	Α.	There are two notes planned for issuance in 2021 aggregating \$80 million. The \$80
8		million will be used to term out short-term borrowing and invest in capital expenditures.
9		
10	Q.	You testified earlier that the Company's investor provided capital structure
11		includes 55.62% common equity. Why is that percentage reasonable and
12		appropriate?
13	Α.	The projected common equity ratio of 55.62% as of the end of the test year is
14		reasonable for several reasons. First, it is consistent with equity ratios found to be
15		reasonable for other utilities within Indiana in recent Commission orders. Second, it is
16		reasonable as compared to the equity ratios of the Company's proxy group, as
17		presented by Petitioner's Witness Ann E. Bulkley. Finally, this is consistent with
18		current financing authority as approved in Cause No. 45171 for Vectren North.
19		
20	Q.	You testified that a 55.62% equity ratio is consistent with equity ratios found by
21		the Commission to be reasonable for other utilities. What findings are you
22		referring to?
23	Α.	The IURC issued an order in the Duke Energy rate case (Cause No. 45253) on June
24		29, 2020 which included an investor provided equity ratio of 53%. Additionally, the
25		IURC issued an order approving a settlement in the NIPSCO electric rate case (Cause

Petitioner's Exhibit No. 13 Vectren North Page 11 of 15

1		No. 45159) on December 4, 2019 which included an investor provided equity ratio of
2		57% and an order approving a settlement in the NIPSCO gas rate case (Cause No.
3		44988) on September 19, 2018 which included an investor provided equity ratio of
4		56.02% at the end of the test year in that case. Given that the equity ratio being
5		requested in this case is within the range of these recent orders, the request is
6		reasonable.
7		
8	Q.	Your second reason for testifying that a 55.62% equity ratio is reasonable is that
9		it is reasonably comparable to the equity ratios of the Company's proxy group.
10		Has the Company provided an analysis comparing its proposed equity ratio to
11		the equity ratios of the proxy group companies?
12	Α.	Petitioner's Witness Bulkley's direct testimony demonstrates that equity ratios of the
13		proxy group range from 50.03% to 66.58% with an average of 58.88%. As Petitioner's
14		Witness Bulkley states, this demonstrates that "Vectren North's projected equity ratio
15		of 55.62% is near the average equity ratio for the utility operating subsidiaries of the
16		proxy groups."
17		
18	Q.	You testified earlier that the Company is requesting approval of a capital
19		structure containing 44.38% long-term debt. Is that debt ratio reasonable?
20	Α.	Yes. That long-term debt ratio reflects projected long-term debt issuances during the
21		test year. See Petitioner's Exhibit No. 18, Schedule D-1. The determination of the cost
22		of debt associated with those projected issuances is discussed below.
23		

24

Petitioner's Exhibit No. 13 Vectren North Page 12 of 15

1	III.	COST OF CAPITAL
2		
3	Q.	What topics do you discuss in this section of your testimony?
4	Α.	I discuss the components of the Company's weighted average cost of capital.
5		
6	Q.	What is the Company's requested weighted average cost of capital?
7	Α.	The Company's requested weighted average cost of capital is 6.32%.
8		
9	Q.	What is the weighted cost of the long-term debt portion of Vectren North's
10		capital structure?
11	Α.	As shown in Petitioner's Exhibit No. 18, Schedule D-1, Vectren North's forecasted
12		weighted average cost of long-term debt as of the end of the test year is 4.36%. The
13		details used to calculate this cost of long-term debt are shown in Petitioner's Exhibit
14		No. 18, Schedule D-2. This cost rate reflects the carrying value of the long-term debt,
15		which reflects the unamortized issuance costs.
16		
17	Q.	Previously you had mentioned that one source of debt capital was intercompany
18		notes between VUHI and the Company. How are the interest rates for those
19		notes determined?
20	Α.	The interest on the intercompany notes between VUHI and the Company is governed
21		by the Financial Services Agreement ("FSA") each entity entered into as of December
22		31, 2011. Per the FSA, "interest shall be charged on the unpaid outstanding balance
23		at a rate per annum equal to the rate paid and to be paid by Lender with respect to
24		the borrowings it made in order to provide funds to Borrower hereunder." For example,
25		if VUHI borrows \$100 million at a rate of 4.0%, any intercompany notes put in place

Petitioner's Exhibit No. 13 Vectren North Page 13 of 15

1		between VUHI and the Company associated with that \$100 million borrowing would
2		carry the same 4.0% interest rate.
3		
4	Q.	Earlier in your testimony you mentioned that there were expected debt
5		issuances planned for the test year. What is the interest rate assumed for those
6		issuances and what is the impact to the cost of long-term debt?
7	A.	The first issuance during the test year of \$50 million will have a coupon of 1.21%. The
8		second issuance during the test year of \$30 million assumes a coupon of 2.87%. Both
9		of these low coupons are included in the proposed cost of long-term debt and have
10		the effect of lowering the cost of debt to the projected 4.36%.
11		
12	Q.	What was the cost of equity used to calculate the Company's proposed cost of
13		capital?
14	A.	The cost of equity used in the determination of the overall cost of capital was 10.15%.
15		Details regarding the cost of equity estimate can be found in Petitioner's Witness
16		Bulkley's direct testimony.
17		
18	Q.	Are there other capital structure components for purposes of determining
19		Vectren North's cost of capital?
20	A.	Yes. As mentioned earlier, Petitioner's Exhibit No. 18, Schedule D-1 and the
21		supporting workpapers contain a listing of those components and their proposed
22		weighted average interest rates. That schedule includes customer deposits at a 1.50%
23		weighted average interest rate and investment tax credits at a rate of 7.58%.
24		

Petitioner's Exhibit No. 13 Vectren North Page 14 of 15

1	Q.	Are there any cost-free components included in Vectren North's proposed cost
2		of capital?
3	Α.	Yes. Accumulated deferred income taxes, customer advances for construction, other
4		post-employment benefits ("OPEB"), and prepaid pension were included at zero cost.
5		Accumulated deferred income taxes are addressed by Petitioner's Witness Brenda L.
6		Musser. Customer advances for construction are discussed by Petitioner's Witness
7		Bell.
8		
9	Q.	What is the prepaid pension asset and why is it included in the capital structure?
10	Α.	The prepaid pension asset is the difference between the cumulative contributions to
11		the pension fund and the cumulative accruals of pension expense. In other words,
12		these are amounts that have been paid into the pension fund in excess of cumulative
13		pension expense. Once amounts are contributed to the fund, the Company no longer
14		has access to these amounts - they must remain in the fund. The prepaid pension
15		asset provides a benefit to customers in that it serves to reduce pension expense that
16		would otherwise be accrued and recovered in rates. I understand that in Indiana there
17		have been two recognized methods for including the value of the prepaid pension
18		asset in ratemaking: some utilities have included the prepaid pension asset in rate
19		base, and other utilities have included the prepaid pension asset in the capital structure
20		as an offset to zero cost capital. Both methods have been accepted by this
21		Commission. We have elected to include the prepaid pension asset in the capital
22		structure.
22		

- 23
- 24

Q. You also mentioned OPEB. What is that and why is it in the capital structure?

Petitioner's Exhibit No. 13 Vectren North Page 15 of 15

1	Α.	This results from the adoption of Financial Accounting Standards No. 106 nearly thirty
2		years ago, which requires that postretirement benefits other than pensions be reflected
3		on an accrual basis. The difference between the accrued expense under generally
4		accepted accounting principles and the amount that is paid out on a pay-as-you-go
5		basis is reflected either as a rate base offset or as a component of zero cost capital.
6		The Company has historically reflected it as zero cost capital. This treatment is the
7		mirror image of the treatment of the prepaid pension asset, and so the OPEB zero cost
8		capital is an offset to the prepaid pension asset in the capital structure.
9		
10		
11	IV.	CONCLUSION
12		
13	Q.	Does this conclude your prepared direct testimony?
14	A.	Yes, it does.

# INDIANA GAS COMPANY, INC.

# d/b/a VECTREN ENERGY DELIVERY OF INDIANA, INC.

# A CENTERPOINT ENERGY COMPANY

# (VECTREN NORTH)

**IURC CAUSE NO. 45468** 

# **DIRECT TESTIMONY**

OF

# **BRETT A. JERASA**

# DIRECTOR, ASSISTANT TREASURER

ON

CAPITAL STRUCTURE AND COST OF DEBT

# **Glossary of Acronyms**

CenterPoint	CenterPoint Energy, Inc.
Company	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of
	Indiana, Inc.
FSA	Financial Services Agreement
IURC or Commission	Indiana Utility Regulatory Commission
Petitioner	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of
	Indiana, Inc.
Service Company	CenterPoint Energy Service Company, LLC
Vectren	Vectren Corporation
Vectren North	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of
	Indiana, Inc.
Vectren South	Southern Indiana Gas and Electric Company d/b/a Vectren
	Energy Delivery of Indiana, Inc.
Vectren Ohio	Vectren Energy Delivery of Ohio, Inc.
VUHI	Vectren Utility Holding, Inc.

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# DIRECT TESTIMONY OF BRETT A. JERASA

1	I.	INTRODUCTION
2		
3	Q.	Please state your name and business address.
4	A.	My name is Brett A. Jerasa. My business address is 1111 Louisiana St, Houston, TX
5		77002.
6		
7	Q.	By whom are you employed?
8	A.	I am employed by CenterPoint Energy Service Company, LLC ("Service Company"),
9		a wholly-owned subsidiary of CenterPoint Energy, Inc. ("CenterPoint"). The Service
10		Company provides centralized support services to CenterPoint's operating units,
11		which includes Vectren Corporation ("Vectren"), a wholly-owned subsidiary of
12		CenterPoint.
13		
14	Q.	On whose behalf are you testifying in this proceeding?
15	A.	I am testifying on behalf of Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery
16		of Indiana, Inc. ("Petitioner", "Vectren North" or "the Company"), which is a subsidiary
17		of Vectren.
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19	Q.	What is your role with respect to Petitioner Vectren North?
20	A.	I am Director, Assistant Treasurer for CenterPoint, the ultimate parent company of
21		Vectren North. I have the same role with two other utility subsidiaries of Vectren -
22		Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana,
23		Inc. ("Vectren South") and Vectren Energy Delivery of Ohio, Inc. ("Vectren Ohio").

1

### 2 Q. Please describe your educational background.

- A. I have a Bachelor of Arts in Economics from the University of Virginia, a Master of Arts
  in History from Old Dominion University, and a Master of Business Administration from
  Indiana University's Kelley School of Business.
- 6

### 7 Q. Please describe your professional experience.

8 A. I have been employed by CenterPoint since 2012 and have held various positions 9 within the company. From 2011 to 2015, I was a lead analyst in the Corporate Strategic 10 Planning group responsible for assisting various business units and functions with the 11 creation of their strategic plans and capital project evaluation. Since 2015 I have 12 worked in the Treasury group, first as a Treasury Manager responsible for the 13 administration and operations of CenterPoint's various pension, savings and benefit 14 plans and Capital Markets activities. In 2020, I was promoted to Director, Assistant 15 Treasurer and have responsibilities for the Company's capital markets, debt 16 compliance, treasury operations and investments.

17

### 18 Q. Provide some specific examples of activities you have undertaken during your

### 19 time in the Treasury department.

- A. I have managed the debt service and compliance of more than \$14 billion of external
   debt, led 16 external bond offerings aggregating \$6.0 billion, led two (2) external
   offerings aggregating \$1.7 billion of equity hybrid securities, among other things.
- 23

## Q. What are your present duties and responsibilities as Director, Assistant Treasurer?

1	Α.	I am responsible for the short-term and long-term financing activities of CenterPoint
2		and its subsidiaries, including Vectren North. This includes having responsibility for
3		cash management, bank relations, short-term borrowings, long-term capital financing,
4		credit rating agency relations and a variety of other finance-related activities. I am
5		responsible for arranging the corporate financings and bank credit facilities for
6		CenterPoint and its utility subsidiaries.
7		
8	Q.	Have you ever testified before any state regulatory commission?
9	Α.	Yes. I have testified before the Indiana Utility Regulatory Commission ("IURC" or "the
10		Commission") on behalf of Vectren North and Vectren South in its most recently filed
11		financing proceeding, Cause Nos. 45457 and 45458.
12		
13	Q.	What is the purpose of your testimony in this proceeding?
14	Α.	My testimony will provide an overview of the components of Vectren North's capital
15		structure and its weighted average cost of capital.
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17	Q.	Are you sponsoring any attachments in this proceeding?
18	Α.	Yes. I am sponsoring the following attachments in this proceeding:
19		• The D Schedules of Petitioner's Exhibit No. 18, Capital Structure and Cost of
20		Capital
21		
22	Q.	Were these schedules prepared by you or under your supervision?
23	A.	Yes, they were.

### 1 II. CAPITAL STRUCTURE

2

3

Q. What topics do you discuss in this section of your testimony?

- A. In this part of my testimony I explain the importance of establishing a capital structure
  that will help preserve the financial integrity of the Company, thereby allowing it to
  maintain access to capital on reasonable terms in all market conditions. Next, I
  describe the Company's projected capital structure for the test year and I explain why
  that capital structure is reasonable.
- 9

# Q. What does the phrase "capital structure" mean in the context of utility ratemaking?

- 12 Α. "Capital structure" refers to the percentages of debt and equity used to finance the 13 assets and perform the operations necessary to provide service to customers. The 14 primary sources of capital to finance long-term assets of the Company are long-term 15 debt and common equity. Capital structure is typically expressed in terms of the ratio 16 of a particular type of capital to total capital. Thus, for example, a utility with a total 17 capitalization of \$1 billion, long-term debt of \$450 million, and common equity of \$550 18 million would have a capital structure composed of 45% long-term debt and 55% 19 common equity.
- 20
- Q. Are there other capital structure components other than investor provided debt
   and equity used to determine Vectren North's requested capital structure?

A. Yes. In addition to investor provided debt and equity, there are several additional
 components included in the regulatory capital structure calculation such as customer
 deposits, accumulated deferred income taxes, prepaid pension and investment tax

- credits. <u>Petitioner's Exhibit No. 18</u>, Schedule D-1 details all of the components used
   to calculate the Company's requested capital structure.
- 3

### 4 Q. Why does a utility finance its assets and operations with different types of capital?

6 Α. A utility typically uses different types of capital because the various elements of capital 7 have different risks, and, hence, different costs. Debt is less risky than equity because 8 debt holders are senior to equity holders in terms of having a claim on the utility's 9 assets, and for that reason debt is generally cheaper than equity. Additionally, income 10 tax deductibility of interest expense, in contrast with the non-deductibility of most types 11 of cash dividends, further reduces the after-tax cost of debt capital. As a utility 12 increases the proportion of debt in its capital structure, however, lenders increasingly 13 demand higher returns to offset the risk of default. Utilities and other companies 14 therefore try to strike a balance that will provide dependable access to capital in a cost-15 effective manner.

### 1 Q. What is the forecasted capital structure for this case?

- 2 A. Table BAJ-1 below details the Company's forecasted capital structure.
- 3

Table BAJ-1

36.88%
0.00%
46.22%
15.29%
1.61%
100.00%

4

### 5 Q. What investor provided capital structure is reflected in the Company's 6 forecasted capital structure?

- A. As is detailed in workpapers to <u>Petitioner's Exhibit No. 18</u>, D Schedules, WPD-1.1, the
  investor provided capital structure consists of 44.38% long-term debt and 55.62%
  common equity. This reflects a projected capital structure and will be updated to actual
  as of June 30, 2021 for Phase 1 rates, and actual as of December 31, 2021 for Phase
  2 rates, as discussed by Petitioner's Witness Angie M. Bell.
- 12

### 13 Q. Does the Company directly issue equity into the external capital markets?

A. No, the sources of the equity on the Company's balance sheet are: (1) equity

contributions from Vectren Utility Holdings, Inc. ("VUHI"); and (2) retained earnings
from operations. The Company may make periodic dividend payments to VUHI to
ensure that the Company's equity ratio remains within a reasonable range, and VUHI
may make equity contributions to the Company for the same purpose. VUHI, in turn,
obtains equity financing ultimately from CenterPoint.

1	Q.	Does the Company issue debt into the external capital markets?
2	Α.	In the past, the Company did issue debt in the public or private debt capital markets,
3		however today all of its debt capital is issued to VUHI.
4		
5	Q.	Are there any forecasted debt issuances included in Vectren North's investor
6		provided capital structure during the test year?
7	Α.	There are two notes planned for issuance in 2021 aggregating \$80 million. The \$80
8		million will be used to term out short-term borrowing and invest in capital expenditures.
9		
10	Q.	You testified earlier that the Company's investor provided capital structure
11		includes 55.62% common equity. Why is that percentage reasonable and
12		appropriate?
13	Α.	The projected common equity ratio of 55.62% as of the end of the test year is
14		reasonable for several reasons. First, it is consistent with equity ratios found to be
15		reasonable for other utilities within Indiana in recent Commission orders. Second, it is
16		reasonable as compared to the equity ratios of the Company's proxy group, as
17		presented by Petitioner's Witness Ann E. Bulkley. Finally, this is consistent with
18		current financing authority as approved in Cause No. 45171 for Vectren North.
19		
20	Q.	You testified that a 55.62% equity ratio is consistent with equity ratios found by
21		the Commission to be reasonable for other utilities. What findings are you
22		referring to?
23	A.	The IURC issued an order in the Duke Energy rate case (Cause No. 45253) on June
24		29, 2020 which included an investor provided equity ratio of 53%. Additionally, the
25		IURC issued an order approving a settlement in the NIPSCO electric rate case (Cause

No. 45159) on December 4, 2019 which included an investor provided equity ratio of
57% and an order approving a settlement in the NIPSCO gas rate case (Cause No.
44988) on September 19, 2018 which included an investor provided equity ratio of
56.02% at the end of the test year in that case. Given that the equity ratio being
requested in this case is within the range of these recent orders, the request is
reasonable.

7

Q. Your second reason for testifying that a 55.62% equity ratio is reasonable is that
 it is reasonably comparable to the equity ratios of the Company's proxy group.
 Has the Company provided an analysis comparing its proposed equity ratio to
 the equity ratios of the proxy group companies?

- A. Petitioner's Witness Bulkley's direct testimony demonstrates that equity ratios of the
  proxy group range from 50.03% to 66.58% with an average of 58.88%. As Petitioner's
  Witness Bulkley states, this demonstrates that "Vectren North's projected equity ratio
  of 55.62% is near the average equity ratio for the utility operating subsidiaries of the
  proxy groups."
- 17

18Q.You testified earlier that the Company is requesting approval of a capital19structure containing 44.38% long-term debt. Is that debt ratio reasonable?

A. Yes. That long-term debt ratio reflects projected long-term debt issuances during the
 test year. See <u>Petitioner's Exhibit No. 18</u>, Schedule D-1. The determination of the cost

of debt associated with those projected issuances is discussed below.

23

22

24

### 1 III. COST OF CAPITAL

2		
3	Q.	What topics do you discuss in this section of your testimony?
4	Α.	I discuss the components of the Company's weighted average cost of capital.
5		
6	Q.	What is the Company's requested weighted average cost of capital?
7	Α.	The Company's requested weighted average cost of capital is 6.32%.
8		
9	Q.	What is the weighted cost of the long-term debt portion of Vectren North's
10		capital structure?
11	Α.	As shown in Petitioner's Exhibit No. 18, Schedule D-1, Vectren North's forecasted
12		weighted average cost of long-term debt as of the end of the test year is 4.36%. The
13		details used to calculate this cost of long-term debt are shown in Petitioner's Exhibit
14		No. 18, Schedule D-2. This cost rate reflects the carrying value of the long-term debt,
15		which reflects the unamortized issuance costs.
16		
17	Q.	Previously you had mentioned that one source of debt capital was intercompany
18		notes between VUHI and the Company. How are the interest rates for those
19		notes determined?
20	Α.	The interest on the intercompany notes between VUHI and the Company is governed
21		by the Financial Services Agreement ("FSA") each entity entered into as of December
22		31, 2011. Per the FSA, "interest shall be charged on the unpaid outstanding balance
23		at a rate per annum equal to the rate paid and to be paid by Lender with respect to
24		the borrowings it made in order to provide funds to Borrower hereunder." For example,
25		if VUHI borrows \$100 million at a rate of 4.0%, any intercompany notes put in place

- between VUHI and the Company associated with that \$100 million borrowing would
   carry the same 4.0% interest rate.
- 3

Q. Earlier in your testimony you mentioned that there were expected debt
issuances planned for the test year. What is the interest rate assumed for those
issuances and what is the impact to the cost of long-term debt?

- A. The first issuance during the test year of \$50 million will have a coupon of 1.21%. The
  second issuance during the test year of \$30 million assumes a coupon of 2.87%. Both
  of these low coupons are included in the proposed cost of long-term debt and have
  the effect of lowering the cost of debt to the projected 4.36%.
- 11
- Q. What was the cost of equity used to calculate the Company's proposed cost of
   capital?
- A. The cost of equity used in the determination of the overall cost of capital was 10.15%.
  Details regarding the cost of equity estimate can be found in Petitioner's Witness
  Bulkley's direct testimony.
- 17
- Q. Are there other capital structure components for purposes of determining
   Vectren North's cost of capital?
- A. Yes. As mentioned earlier, <u>Petitioner's Exhibit No. 18</u>, Schedule D-1 and the supporting workpapers contain a listing of those components and their proposed weighted average interest rates. That schedule includes customer deposits at a 1.50% weighted average interest rate and investment tax credits at a rate of 7.58%.

24

Cause No. 45468

# Q. Are there any cost-free components included in Vectren North's proposed cost of capital?

A. Yes. Accumulated deferred income taxes, customer advances for construction, other
 post-employment benefits ("OPEB"), and prepaid pension were included at zero cost.
 Accumulated deferred income taxes are addressed by Petitioner's Witness Brenda L.
 Musser. Customer advances for construction are discussed by Petitioner's Witness
 Bell.

8

### 9 Q. What is the prepaid pension asset and why is it included in the capital structure?

10 A. The prepaid pension asset is the difference between the cumulative contributions to 11 the pension fund and the cumulative accruals of pension expense. In other words, 12 these are amounts that have been paid into the pension fund in excess of cumulative 13 pension expense. Once amounts are contributed to the fund, the Company no longer 14 has access to these amounts – they must remain in the fund. The prepaid pension 15 asset provides a benefit to customers in that it serves to reduce pension expense that 16 would otherwise be accrued and recovered in rates. I understand that in Indiana there 17 have been two recognized methods for including the value of the prepaid pension 18 asset in ratemaking: some utilities have included the prepaid pension asset in rate 19 base, and other utilities have included the prepaid pension asset in the capital structure 20 as an offset to zero cost capital. Both methods have been accepted by this 21 Commission. We have elected to include the prepaid pension asset in the capital 22 structure.

23

24 Q. You also mentioned OPEB. What is that and why is it in the capital structure?

1	Α.	This results from the adoption of Financial Accounting Standards No. 106 nearly thirty
2		years ago, which requires that postretirement benefits other than pensions be reflected
3		on an accrual basis. The difference between the accrued expense under generally
4		accepted accounting principles and the amount that is paid out on a pay-as-you-go
5		basis is reflected either as a rate base offset or as a component of zero cost capital.
6		The Company has historically reflected it as zero cost capital. This treatment is the
7		mirror image of the treatment of the prepaid pension asset, and so the OPEB zero cost
8		capital is an offset to the prepaid pension asset in the capital structure.
9		
10		
11	IV.	CONCLUSION
12		
13	Q.	Does this conclude your prepared direct testimony?

14 A. Yes, it does.

### VERIFICATION

I, Brett A. Jerasa, affirm under the penalties of perjury that the forgoing representations of fact in my Direct Testimony are true to the best of my knowledge, information and belief.

Brett A. Jeraša

Dated: February 10, 2021

#### VECTREN NORTH CAUSE NO. 45468 RATE OF RETURN SUMMARY AS OF DECEMBER 31, 2021

SCHEDULE D-1 PAGE 1 OF 1 WITNESS RESPONSIBLE: B.A. JERASA

Line	Class of Capital	Reference	An	nount (\$000)	Percent	Cost	Weighted Cost
1	Long-Term Debt	SCH D-2	\$	614,876	36.88%	4.36%	1.61%
2	Preferred Stock	SCH D-3	\$	-	0.00%	0.00%	0.00%
3	Common Equity	SCH D-4	\$	770,688	46.22%	10.15%	4.69%
4	Cost Free Capital	SCH D-5	\$	254,974	15.29%	0.00%	0.00%
5	Other Capital	SCH D-5	\$	26,811	1.61%	1.50%	0.02%
6	Total Capital	Sum of Lines 1 - 5	\$	1,667,350	100.00%		6.32%
		Interes	t Synchro	onization			
7	Long-term Debt	Line 1			36.88%	4.36%	1.61%
8	Customer Deposits	WPD-1.1, WPD-5.7			1.61%	1.50%	0.02%
9	Interest Component of ITC	WPD-1.1			0.00%	4.36%	0.00%
10	Total	Sum of Lines 7 - 9					1.63%
11	Original Cost Rate Base	SCH B-1					\$ 1,610,799,000
12	Synchronized Interest Expense	Line 10 x Line 11					\$ 26,256,024

### VECTREN NORTH CAUSE NO. 45468 LONG-TERM DEBT AS OF DECEMBER 31, 2021

SCHEDULE D-2 PAGE 1 OF 1 WITNESS RESPONSIBLE: B.A. JERASA

Line	Long-Term Notes	Issue Date	Maturity Date	Principal Amount Outstanding	Total Discount and Expense, Net of Premium	Net Proceeds	Effective Cost Rate	Annual Interest Expense
1	Third Party Long-Term Debt:							
2	6.53% Series E	06/27/95	06/27/25	10,000,000	588,119	9,411,881	7.18%	653,000
3	6.42% Series E	07/07/97	07/07/27	5,000,000	200,000	4,800,000	6.86%	321,000
4	6.68% Series E	07/07/97	07/07/27	1,000,000	-	1,000,000	6.68%	66,800
5	6.34% Series F	12/09/97	12/10/27	20,000,000	651,007	19,348,993	6.69%	1,268,000
6	6.36% Series F	05/04/98	05/01/28	10,000,000	325,503	9,674,497	6.71%	636,000
7	6.55% Series F	06/30/98	06/30/28	20,000,000	651,007	19,348,993	6.91%	1,310,000
8	7.08% Series G	10/05/99	10/05/29	30,000,000	2,506,640	27,493,360	8.06%	2,124,000
9	Subtotal Third Party Long-Term Debt	:		\$ 96,000,000				\$ 6,378,800
10	VUHI Long-Term Debt:							
11	3.72% Series	12/05/13	12/05/23	99,386,727	-	99,386,727	3.80%	3,781,278
12	3.20% Series	06/05/13	06/05/28	8,952,105	-	8,952,105	3.87%	346,587
13	3.26% Series	08/28/17	08/28/32	24,862,171	-	24,862,171	3.32%	824,189
14	6.10% Series	11/21/05	12/01/35	50,568,961	3,456,722	47,112,239	6.52%	3,031,035
15	3.90% Series	12/15/15	12/15/35	8,290,114	-	8,290,114	3.95%	327,159
16	4.25% Series	06/05/13	06/05/43	15,914,853	-	15,914,853	4.60%	732,077
17	4.36% Series	12/15/15	12/15/45	15,751,041	-	15,751,041	4.40%	693,075
18	4.36% Series	12/15/15	12/15/45	39,792,104	-	39,792,104	4.40%	1,750,927
19	3.93% Series	11/29/17	11/29/47	69,607,078	-	69,607,078	3.97%	2,764,097
20	3.42% Series	09/10/19	09/10/49	20,000,000	-	20,000,000	3.42%	684,000
21	4.51% Series	12/15/15	12/15/55	15,751,217	-	15,751,217	4.55%	716,136
22	1.21% Series	06/30/20	07/01/25	10,000,000	-	10,000,000	1.21%	121,000
23	3.92% Series	11/30/20	05/01/50	60,000,000	-	60,000,000	3.92%	2,352,000
24	1.21% Series (2nd Push Down)	06/30/21	07/01/25	50,000,000	-	50,000,000	1.21%	605,000
25	2.87% Series (1st Push Down)	06/30/21	07/01/51	30,000,000	-	30,000,000	2.87%	861,000
26	Subtotal VUHI Long-Term Debt			\$ 518,876,372				\$ 19,589,560
27	Total Long-Term Debt			\$ 614,876,372			4.36%	\$ 25,968,360

#### VECTREN NORTH CAUSE NO. 45468 PREFERRED STOCK AS OF DECEMBER 31, 2021

### SCHEDULE D-3 PAGE 1 OF 1 WITNESS RESPONSIBLE: B.A. JERASA

Line	Class of Capital	Reference	Reference Amount (\$000)		
1	Preferred Stock	N/A	\$	-	To SCH D-1

### VECTREN NORTH CAUSE NO. 45468 COMMON EQUITY AS OF DECEMBER 31, 2021

### SCHEDULE D-4 PAGE 1 OF 1 WITNESS RESPONSIBLE: B.A. JERASA

Line	Class of Capital	Reference	Amo	ount (\$000)	
1	Common Shareholders' Equity:				
2	Common Stock	WPD-4	\$	399,536	
3	Retained Earnings - First of Year	WPD-4	\$	352,759	
4	Plus: Net Income	WPD-4	\$	73,394	
5	Subtotal Retained Earnings	Line 3 + Line 4	\$	426,153	
6	Less: Dividends	WPD-4	\$	55,000	
7	Retained Earnings - End of Year	Line 5 - Line 6	\$	371,153	
8	Total Common Shareholders' Equity	Line 2 + Line 7	\$	770,688	To SCH D-1

#### VECTREN NORTH CAUSE NO. 45468 COST-FREE CAPITAL AND OTHER AS OF DECEMBER 31, 2021

### SCHEDULE D-5 PAGE 1 OF 1 WITNESS RESPONSIBLE: B.A. JERASA

Line	Class of Capital	lass of Capital Reference		Amount (\$000)		
1	Cost-Free Capital:					
2	Deferred Income Taxes	WPD-5.1	\$	187,236		
3	Tax Regulatory Assets (FAS 109)	WPD-5.1	\$	84,383		
4	Subtotal Deferred Income Taxes	Sum of Lines 2 - 3	\$	271,619		
5	Customer Advances for Construction	WPD-5.1	\$	4,815		
6	OPEB	WPD-5.1	\$	7,941		
7	Prepaid Pension	WPD-5.1	\$	(29,401)		
8	Total Cost-Free Capital	Sum of Lines 4 - 7	\$	254,974	To SCH D-1	
9	<u>Other:</u>					
10	Customer Deposits	WPD-5.1	\$	26,811		
11	Investment Tax Credit	WPD-5.1	\$	1		
12	Total Other Capital	Sum of Lines 10 - 11	\$	26,811	To SCH D-1	