

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

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

**VERIFIED DIRECT TESTIMONY  
OF  
MARIA T. DIAZ**

**On Behalf of Petitioner,  
DUKE ENERGY INDIANA, LLC**

**Petitioner's Exhibit 6**

**November 23, 2021**

**DIRECT TESTIMONY OF MARIA T. DIAZ  
DIRECTOR, RATES AND REGULATORY PLANNING  
DUKE ENERGY INDIANA, LLC  
BEFORE THE  
INDIANA UTILITY REGULATORY COMMISSION**

**I. INTRODUCTION**

1

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Maria T. Diaz, and my business address is 1000 East Main Street, Plainfield,  
4 Indiana.

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

6 A. I am employed by Duke Energy Indiana, LLC (“Duke Energy Indiana,” “Petitioner,” or  
7 “Company”) as Director, Rates & Regulatory Planning.

8 **Q. PLEASE DESCRIBE YOUR DUTIES AS DIRECTOR, RATES & REGULATORY  
9 PLANNING.**

10 A. I have responsibility for certain regulated rate matters involving Duke Energy Indiana,  
11 including cost of service studies, rate administration, and rate tracker filings. I also  
12 administer rate issues for the Company’s jointly owned facilities.

13 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL  
14 BACKGROUND.**

15 A. I am a graduate of the University of Indianapolis, holding a Bachelor of Arts Degree in  
16 Accounting. I also have a Master’s in Business Administration from Butler University. I  
17 am a Certified Public Accountant in the State of Indiana. I was hired by the Company in  
18 1997 as Supervisor of Fuels, Joint Ownership, and Trading Accounting. In 2000, I  
19 became Manager of Energy Trading Accounting. During 2005, I held the position of

1 SEC Reporting Manager. Following the April 3, 2006 merger of Cinergy and Duke  
2 Energy, I assumed my current rates position with the Company.

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

4 A. My testimony will discuss how the Company's proposed 6-Year Transmission and  
5 Distribution System Improvement Plan ("TDSIC 2.0") for January 1, 2023 through  
6 December 31, 2028, meets various statutory requirements contained in the Transmission,  
7 Distribution and Storage System Improvement Charge ("TDSIC") statute. I will explain  
8 the proposed recovery of the estimated costs of TDSIC 2.0. The Company proposes to  
9 recover 80% of these costs under the Company's Standard Contract Rider No. 65 –  
10 Transmission and Distribution Infrastructure Improvement Cost Adjustment ("Rider 65"  
11 or "TDSIC Rider"). I will discuss the Company's request for Commission approval of a  
12 regulatory asset with carrying costs for recovery in the Company's next retail electric  
13 general base rate case for TDSIC 2.0 costs deferred pursuant to Indiana Code § 8-1-39-9.  
14 I will also discuss the allocation of approved costs to the jurisdictional customers.  
15 Finally, I will provide an estimate of the jurisdictional costs of TDSIC 2.0 and the  
16 estimated rate impacts associated with those costs.

17 **II. STATUTORY REQUIREMENTS**

18 **Q. INDIANA CODE § 8-1-39-9(d) STATES THAT A PUBLIC UTILITY MAY NOT**  
19 **FILE A PETITION WITHIN NINE (9) MONTHS AFTER THE DATE ON**  
20 **WHICH THE COMMISSION ISSUES AN ORDER CHANGING PETITIONER'S**  
21 **BASIC RATES AND CHARGES. PLEASE PROVIDE THE DATE OF THE**  
22 **COMPANY'S LAST ELECTRIC RATE CASE ORDER.**

1 A. The Company's last retail electric base rate case order in Cause No. 45253, which  
2 changed basic rates and charges, was issued on June 29, 2020 – more than nine months  
3 before the filing of the Petition in this case.

4 **Q. INDIANA CODE § 8-1-39-9(e) REQUIRES THAT A PUBLIC UTILITY THAT**  
5 **IMPLEMENTS A TDSIC SHALL FILE A PETITION FOR APPROVAL OF THE**  
6 **COMPANY'S BASIC RATES AND CHARGES BEFORE THE END OF THAT**  
7 **TDSIC PLAN. DOES THE COMPANY INTEND TO COMPLY WITH THIS**  
8 **REQUIREMENT?**

9 A. Yes, the Company will make the required filing for a change in basic rates and charges  
10 before the expiration of TDSIC 2.0. Pursuant to Indiana Code § 8-1-39-15, the Company  
11 will also file revised rate schedules resetting the TDSIC Rider charge once new basic  
12 rates and charges that include TDSIC 2.0 investments become effective in accordance  
13 with a Commission order.

14 **Q. ARE ANY OF THE PROPOSED TDSIC 2.0 INVESTMENTS INCLUDED IN THE**  
15 **COMPANY'S RATE BASE IN THE MOST RECENT RATE CASE?**

16 A. No. These are new projects which have not previously been included in the Company's  
17 rate base. The rate base cutoff in the most recent rate case was as of December 31, 2020  
18 and the earliest TDSIC 2.0 projects will be completed is in 2023. Also, TDSIC 2.0  
19 development costs for this plan began in September of 2020 and were recorded in a  
20 FERC CFR 186 account, which is not part of the Company's current rate base.



1 A. The Company will include expenditures for projects that are in-service at the time of the  
2 annual cut-off dates and not include the expenditures during the construction of the  
3 projects (“CWIP”) in TDSIC 2.0. This is consistent with the Company’s methodology in  
4 the TDSIC 1.0 filings.

5 **Q. WHAT IS THE COMPANY PROPOSING FOR TDSIC 2.0 COSTS NOT**  
6 **INCLUDED IN RIDER 65?**

7 A. Duke Energy Indiana proposes to defer the remaining 20% of the retail jurisdictional  
8 portion TDSIC 2.0 costs until its next general retail electric base rate case, in accordance  
9 with Indiana Code § 8-1-39-9(c). Pursuant to this provision, Duke Energy Indiana  
10 requests that the Commission approve the deferral for subsequent recovery of the retail  
11 jurisdictional portion of the remaining twenty percent (20%) of approved expenditures,  
12 allowance for funds used during construction (“AFUDC”), post-in-service carrying costs,  
13 O&M expense, property taxes, and depreciation expense using a regulatory asset account  
14 (FERC CFR Account 182.3) until such costs are fully reflected in Duke Energy Indiana’s  
15 retail base rates after a general retail electric base rate case. The Company requests that  
16 carrying costs on the deferred costs identified above be accrued using Duke Energy  
17 Indiana’s overall weighted average cost of capital as most recently approved by the  
18 Commission.

19 **Q. WHEN WILL AFUDC CEASE FOR TDSIC 2.0 COSTS?**

20 A. AFUDC will be applied to project costs until such project costs are included for recovery  
21 under Rider 65, in base rates or when the projects are placed in service.

1 **Q. TO WHAT EXTENT WILL POST-IN-SERVICE CARRYING COSTS BE**  
2 **ACCRUED ON TDSIC 2.0 COSTS?**

3 A. In accordance with Indiana Code § 8-1-39-9, the Company proposes that post-in-service  
4 carrying costs, which include both debt and equity financing be accrued on approved  
5 capital expenditures, including accrual on previously computed post-in-service carrying  
6 cost amounts, from the in-service date until such costs are included in the Company's  
7 rates under Rider 65 or in base rates and that the Commission approve the recovery of the  
8 accrued carrying costs.

9 **Q. TO WHAT EXTENT WILL COSTS BE DEFERRED WITH RESPECT TO**  
10 **TDSIC 2.0 COSTS?**

11 A. The Company proposes that the retail jurisdictional portion of post-in-service O&M,  
12 depreciation, property tax expense, and post-in-service carrying costs be deferred with  
13 respect to TDSIC 2.0 costs from the in-service date until the cost is included in the  
14 Company's rates under Rider 65 or in base rates.

15 **Q. DOES THE COMPANY PROPOSE TO INCLUDE ONLY INVESTMENTS IN**  
16 **THE TDSIC RIDER THAT ARE CHARGED TO FERC TRANSMISSION AND**  
17 **DISTRIBUTION PLANT ACCOUNTS?**

18 A. Not exclusively. The Company will consider both the FERC accounting and whether  
19 the function is a transmission or distribution service. The statute does not limit the costs  
20 included in the rider to specific FERC accounts. The statute specifies that eligible  
21 transmission, distribution and storage system improvements must be projects for the  
22 purpose of safety, reliability, system modernization, or economic development that were

1 not included in rate base and that were described and approved in the TDSIC plan by the  
 2 Commission or approved as a targeted economic development project. *See* Ind. Code §  
 3 8-1-39-2(a). Further, Indiana Code § 8-1-39-2(b) states that inspection based projects  
 4 such as pole inspection and pole replacement projects are included and specifies that  
 5 information technology systems or distributed energy resource management systems  
 6 which support the modernization of transmission, distribution, and storage systems are  
 7 also included. The projects Duke Energy Indiana has proposed, including certain  
 8 investments in general and intangible accounts, meet these criteria.

9 Additionally, FERC has several broad categories of plant accounts for accounting  
 10 purposes including production, transmission, distribution, general and intangible.  
 11 Ratemaking for electric utilities, however, has only three broad categories or functions:  
 12 Production, Transmission and Distribution. The costs accounted for as “General” and  
 13 “Intangible” under the FERC system are divided up and allocated to Production,  
 14 Transmission or Distribution categories for ratemaking purposes. The ratemaking  
 15 functions include all costs that make assets function or provide power service to  
 16 customers.

17 **Q. WOULD YOU PROVIDE AN EXAMPLE WHERE THE FERC ACCOUNTING**  
 18 **FOR A TRANSMISSION OR DISTRIBUTION PROJECT MAY NOT BE IN A**  
 19 **TRANSMISSION OR DISTRIBUTION FERC ACCOUNT?**

20 A. Yes. The communication equipment and software necessary to support TDSIC 2.0, such  
 21 as the Advanced Distribution Management System (“ADMS”) project, is classified as  
 22 “General” and/or “Intangible”. ADMS, for example, integrates several utility distribution



1 systems and includes functions such as automated fault location, isolation and restoration,  
2 among others, that are used in the distribution systems such as Self-Optimizing Grid  
3 (“SOG”) and Integrated Volt Var Control (“IVVC”), as further discussed by Witness  
4 Lewis.

5 **Q. WHAT DEPRECIATION RATES ARE USED FOR TDSIC 2.0?**

6 A. The rates used for depreciation expense are the weighted average depreciation rates  
7 approved in the retail base rate case in Cause No. 45253 by the transmission and  
8 distribution plant groupings.

9 **Q. IS THE COMPANY GOING TO NET DEPRECIATION ON RETIRED PLANT**  
10 **AGAINST DEPRECIATION ON NEW PLANT INCLUDED IN THE TDSIC**  
11 **RIDER?**

12 A. Yes. The proposed netting of depreciation expense on retired plant is a change from the  
13 current TDSIC 1.0 plan, which did not include netting of depreciation expense. The  
14 practice of including reductions for depreciation expense has been adopted and/or  
15 proposed by other Indiana investor-owned utilities since the Company’s initial TDSIC  
16 1.0 plan approval.<sup>1</sup>

17 The Company has estimated and included depreciation expense reductions for  
18 retirements in this plan filing so as to not recover new and replacement project  
19 depreciation expense on both the additions and the retired asset. In the first tracker

---

<sup>1</sup> See pending plan filing for Northern Indiana Public Service Company Cause No. 45557 filed 6/1/21; Indianapolis Power & Light Cause No. 45264 - TDSIC 1 approved 10/14/2020; and Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South Cause No. 44910 approved 9/20/2017

1 filing, the Company will present the actual calculations supporting the reductions for the  
2 depreciation expense credits and provide supporting workpapers.

3 **Q. IS THE DEFERRED ACCOUNTING TREATMENT PROPOSED BY THE**  
4 **COMPANY IN ACCORDANCE WITH GAAP?**

5 A. Yes. U.S. GAAP specifically discusses the accounting for a regulator's actions designed  
6 to protect a utility from the effects of regulatory lag. Topic 980 of the FASB's  
7 Accounting Standards Codification ("ASC") covers the accounting guidance for  
8 regulated operations formerly provided in Statement of Financial Accounting Standards  
9 No. 71. Costs associated with regulatory lag can be capitalized for accounting purposes,  
10 provided the provisions of ASC 980-340-25-1 are met. The guidance states:

11 Rate actions of a regulator can provide reasonable assurance of the existence of an  
12 asset. An enterprise shall capitalize all or part of an incurred cost that would  
13 otherwise be charged to expense if both of the following criteria are met: (a) It is  
14 probable (as defined in Topic 450) that future revenue in an amount at least equal  
15 to the capitalized cost will result from inclusion of that cost in allowable costs for  
16 ratemaking purposes and (b) Based on available evidence, the future revenue will  
17 be provided to permit recovery of the previously incurred cost rather than to  
18 provide for expected levels of similar future costs. If the revenue will be provided  
19 through an automatic rate-adjustment clause, this criterion requires that the  
20 regulator's intent clearly be to permit recovery of the previously incurred cost. A  
21 cost that does not meet these asset recognition criteria at the date the cost is  
22 incurred shall be recognized as a regulatory asset when it does meet those criteria  
23 at a later date.

24 **Q. DO YOU HAVE AN OPINION AS TO THE REASONABLENESS OF DUKE**  
25 **ENERGY INDIANA'S REQUESTED DEFERRED ACCOUNTING TREATMENT**  
26 **AND THE ACTION REQUIRED BY THE COMMISSION TO ALLOW FOR THE**  
27 **REQUESTED DEFERRED ACCOUNTING TREATMENT?**

1 A. Yes. In this filing, the requested deferred accounting treatment is provided for in Indiana  
2 Code § 8-1-39-9(c). Deferral and subsequent recovery of the retail jurisdictional portion  
3 of TDSIC 2.0 costs, until they can be included in Rider 65 or base rates, is reasonable and  
4 appropriate from both a ratemaking and an accounting perspective. Such treatment will  
5 minimize the timing difference between cost recognition on the Company's books and  
6 cost recovery and will recognize the fact that the infrastructure will be in service for the  
7 benefit of retail customers. For the Company to defer the expenses and reflect the costs  
8 as a regulatory asset, however, it must be probable that such costs will be recovered  
9 through rates in future periods. To satisfy the probability standard, the Commission's  
10 Order in this proceeding should specifically approve the accounting and ratemaking  
11 treatment proposed by Duke Energy Indiana.

12 **IV. RIDER COMPONENTS**

13 **Q. IS THE COMPANY PROPOSING ANY CHANGES TO ITS TDSIC RIDER –**  
14 **RIDER 65?**

15 A. No, the Company is not proposing any changes to the tariff language in this proceeding.  
16 Therefore, the existing tariff language in pages 1 and 2 of the most recently approved  
17 TDSIC rate filing (TDSIC-9) remains applicable. The Company will update rates in  
18 accordance with the timing provided for in Indiana Code § 8-1-39-9(f).

19 **Q. WHAT COSTS WILL BE RECOVERED IN THE RIDER FOR TDSIC 2.0?**

20 A. Rider 65 recovers 80% of the retail jurisdictional portion of the costs associated with  
21 TDSIC 2.0 projects and would include financing costs, O&M directly associated with the  
22 construction of the project, depreciation, property taxes, and other costs approved by the

1 Commission applicable to the projects in the establishment of the revenue requirements.

2 For example, the costs include program plan development and support costs from a third-  
3 party consultant, Black & Veatch (“B&V”), as described more fully below. The  
4 components of the revenue requirement are also multiplied by revenue conversion factors  
5 to establish the total revenue requirement for the rider. This methodology is consistent  
6 with TDSIC 1.0 with the additional inclusion of targeted economic development projects  
7 as described in the testimony of Ms. Schneider.

8 **Q. PLEASE SUMMARIZE THE O&M EXPENSES INCLUDED IN TDSIC 2.0.**

9 A. O&M directly associated with the construction of TDSIC 2.0 projects is \$131 million as  
10 included in Petitioner’s Exhibit 2-A of Witness Lewis.

11 **Q. PLEASE SUMMARIZE THE TARGETED ECONOMIC DEVELOPMENT**  
12 **PROJECTS ANTICIPATED TO BE PROPOSED DURING TDSIC 2.0.**

13 A. Investments in targeted economic development projects total \$158 million as shown in  
14 Petitioner’s Exhibit 2-A of Witness Lewis.

15 **Q. WHAT RETURN DOES THE COMPANY PROPOSE TO USE IN THE**  
16 **DEVELOPMENT OF RIDER 65 FOR TDSIC 2.0?**

17 A. The Company proposes to use the current return on common equity approved by the  
18 Commission in the most recent general retail electric base rate case, currently 9.70%, as  
19 approved in the Commission’s June 29, 2020 Order in Cause No. 45253. The return on  
20 equity would remain the same but the capital structure would be updated with each filing,  
21 along with the debt costs, consistent with the Company’s other rider filings including the  
22 TDSIC 1.0 plan update since the Order in Cause No. 45253. The TDSIC statute states

1 that there are several factors the Commission may consider in determining an appropriate  
2 pretax return to be used in the TDSIC rate adjustment mechanism. As to the appropriate  
3 cost of equity, the statute refers to “the public utility’s cost of common equity determined  
4 by the Commission in the public utility’s most recent general rate proceeding in Indiana  
5 Code § 8-1-39-13(a) as a consideration.” The Company’s use of 9.70% complies with  
6 this consideration and is reasonable given its recent approval in the base rate case.  
7 Further, the application of the same return on equity to assets that were included in base  
8 rates to the TDSIC Rider is reasonable, as is sharing a common ROE for the retail rate  
9 adjustment mechanisms across the Company.

10 **Q. HOW HAVE COSTS RELATED TO WHOLESALE CUSTOMERS BEEN**  
11 **HANDLED FOR PURPOSES OF THE RATE IMPACT ESTIMATES?**

12 A. In Cause No. 45253, wholesale customers did not receive an allocation for transmission  
13 and distribution costs, as such, the retail costs reflect 100% allocation to retail in the rate  
14 impact estimates for TDSIC 2.0. This is consistent with the TDSIC 1.0 filings made  
15 since the retail base rate case.

16 **Q. HOW DOES THE COMPANY PROPOSE TO ALLOCATE THE REVENUE**  
17 **REQUIREMENT TO THE VARIOUS RETAIL RATE GROUPS?**

18 A. The Company proposes to allocate the transmission and distribution revenue requirement  
19 developed for Rider 65 to the rate groups based on the revenue requirement by rate group  
20 approved by the Commission in the last retail base rate case, Cause No. 45253. These  
21 cost allocations fully comply with Indiana Code § 8-1-39-9(a)(1), which requires that the  
22 Company use the customer class revenue allocation factor based on firm load approved in

1 the public utility's most recent retail base rate case order. The same percentages used in  
2 TDSIC 2.0 to allocate the revenue requirement have been used in the TDSIC 1.0 filings  
3 since the retail base rate case. Costs will be billed to individual customers within a rate  
4 group based on kilowatt-hour sales except for customers served under Rate HLF. For  
5 Rate HLF, the Company proposes to recover the costs based on non-coincident kW  
6 demands.

7 **Q. PLEASE EXPLAIN HOW THE COMPANY PROPOSES TO HANDLE THE**  
8 **FUEL CLAUSE RETURN TEST IF THE COMMISSION APPROVES THE**  
9 **CONTINUED USE OF THE TDSIC RIDER.**

10 A. The Company proposes to increase the allowed net operating income with the  
11 incremental net operating income from Rider 65 as provided for in Indiana Code § 8-1-  
12 39-13(b). This treatment is also consistent with how the test was administered for TDSIC  
13 1.0.

14 **Q. IS THE COMPANY PROPOSING TO CONTINUE TO IMPLEMENT THE**  
15 **TDSIC RIDER ON A PROJECTED OR ACTUAL BASIS?**

16 A. Yes, the Company is proposing to continue to use forecasted amounts for O&M,  
17 depreciation, and property taxes based on annual cut-off dates. The financing costs on  
18 invested capital would be on an actual basis based on the same annual cut-off dates used  
19 for the in-service capital projects. We will true-up amounts to actual levels of O&M,  
20 depreciation, and property taxes and to actual kWh sales levels in subsequent Rider  
21 proceedings. This is consistent with the approved TDSIC 1.0 rider implementation.

1 **Q. PLEASE PROVIDE A PROPOSED TIMELINE FOR THE COMPANY'S RIDER**  
2 **65 FILINGS.**

3 A. The Company proposes that it would make annual rider filings of Rider 65 to effectuate  
4 rate changes. For example, the first Rider 65 filing for TDSIC 2.0 would likely occur in  
5 the April 2024 timeframe with a projected effective date of approximately October 2024.  
6 The filing in April 2024 would seek recovery of capital expenditures and costs as of  
7 December 2023 and estimated O&M, property taxes, and depreciation expense for the  
8 following 12-month period of October 2024 through September 2025. Going forward,  
9 the Company would continue to file the TDSIC Rider each April. We would also include  
10 a reconciliation in subsequent Rider 65 filings. As described in the testimony of Mr.  
11 Lewis and Mr. Dickey, the Company's annual plan filings would also include an update  
12 to the remaining years of TDSIC 2.0.

13 **Q. DOES THE COMPANY PROPOSE TO RECOVER ANY ADDITIONAL COSTS**  
14 **IN RIDER 65?**

15 A. Yes. The Company is proposing to include the expenses incurred for retaining B&V.  
16 Mr. Jim Shields from B&V has provided testimony on a variety of topics related to  
17 TDSIC 2.0 estimates. Additionally, B&V developed the analyses discussed in the  
18 testimony of Mr. Lewis and Mr. Dickey. These costs are similar to types of review and  
19 analysis costs for the TDSIC 1.0 that were included in the Company's TDSIC 1.0  
20 tracker and amortized over a three-year period. We are also proposing to include the  
21 B&V costs associated with providing testimony and supporting this proceeding. Similar

1 to the current TDSIC 1.0 plan, we are proposing to amortize all B&V costs over a three-  
2 year period.

3 **V. RATE IMPACTS**

4 **Q. PLEASE SUMMARIZE THE ESTIMATED RATE IMPACT OF TDSIC 2.0.**

5 A. The rate impact will vary based on several variables including, but not limited to, the  
6 following:

- 7 • The actual AFUDC and the actual AFUDC rates applied to the approved projects.
- 8 • The actual capital structure, cost of capital rates, and revenue conversion factors  
9 in effect for the rider filings.
- 10 • Timing of TDSIC 2.0 projects, cash flows, and approvals under the TDSIC Rider.
- 11 • The timing of the Company's next retail base rate case following completion of  
12 the projects included in TDSIC 2.0, which will impact the amount of the post-in-  
13 service carrying costs and deferred depreciation. Also, the timing of the  
14 Company's next retail base rate case will impact the return on equity, allocation  
15 amounts, and depreciation rates used in the projects remaining in TDSIC 2.0.
- 16 • The final costs of TDSIC 2.0.

17 However, based on the estimated TDSIC 2.0 costs, estimated carrying costs, and  
18 depreciation expense, the total annual average retail rate impact compared to the prior  
19 year retail revenue is estimated to be slightly less than 1% over the recovery periods.  
20 Petitioner's Exhibit 6-A shows the calculation of the estimated retail rate impact. These  
21 overall rate impacts are for the estimated cost of TDSIC 2.0 included in Rider 65 (*i.e.*,



80% of the retail jurisdictional costs) and the annual increases will vary by year while the cumulative revenue requirements increase over the rate filings.

Below is a summary of the total retail estimated rate impact from Exhibit 6-A.

Summary of Estimated Average Annual Retail Rate Impact								
	2024	2025	2026	2027	2028	2029	2030	AVG
Total Retail Annual Percentage Increase over Prior Year	0.52%	1.88%	1.05%	1.44%	1.00%	0.12%	(0.00%)	0.86%
Increase due to Targeted Economic Development (TED)	0.00%	0.00%	0.31%	0.21%	0.04%	(0.07%)	(0.02%)	0.07%
Total Retail Annual Percentage Increase with TED	0.52%	1.88%	1.36%	1.65%	1.04%	0.05%	(0.02%)	0.93%

**Q. DOES THE COMPANY'S PROPOSAL COMPLY WITH INDIANA CODE § 8-1-39-14, WHICH LIMITS THE ANNUAL AVERAGE TOTAL INCREASE TO TWO PERCENT (2%) OF TOTAL RETAIL REVENUES EXCLUDING TARGETED ECONOMIC DEVELOPMENT PROJECT TDSIC REVENUES?**

A. Yes, it does. The maximum estimated average total retail increase compared to retail revenue (excluding economic development projects) is 1.88% in year 2025. Rider 65 filings will include the actual proposed revenue increase compared to the total retail revenues at the time. However, should an actual total amount exceed the two percent annual total cap, the Company requests approval to defer recovery of the TDSIC costs above the cap pursuant to Indiana Code § 8-1-39-14(b).

**VI. CONCLUSION**

**Q. WAS PETITIONER'S EXHIBIT 6-A PREPARED BY YOU OR UNDER YOUR SUPERVISION?**

A. Yes, it was.

**Q. DOES THIS CONCLUDE YOUR PREFILED TESTIMONY?**

A. Yes, it does.

**Duke Energy Indiana, LLC**

Estimated Retail Revenue Increase Attributable To  
Duke Energy Indiana's TDSIC  
 without Targeted Economic Development  
 (Dollars In Thousands)

Line No.	Description	2024	2025	2026	2027	2028	2029	2030	Line No.
<b>Return Revenue</b>									
1	Transmission (see Workpaper 1-MTD)	\$ 1,047	\$ 5,923	\$ 15,244	\$ 30,398	\$ 40,638	\$ 47,470	\$ 51,669	1
2	Distribution (see Workpaper 1-MTD)	1,699	8,648	17,237	28,946	39,108	48,471	55,251	2
3	Total Return Revenue	\$ 2,746	\$ 14,571	\$ 32,481	\$ 59,344	\$ 79,746	\$ 95,941	\$ 106,920	3
<b>Post In-Service Carrying Cost Revenue</b>									
4	Transmission (see Workpaper 2-MTD)	490	3,148	8,505	15,371	18,523	13,772	9,868	4
5	Distribution (see Workpaper 2-MTD)	794	4,646	9,913	13,353	15,685	14,637	13,061	5
6	Total Carrying Cost Revenue	\$ 1,284	\$ 7,794	\$ 18,418	\$ 28,724	\$ 34,208	\$ 28,409	\$ 22,929	6
<b>Depreciation Revenue</b>									
7	Transmission (see Workpaper 3-MTD)	530	2,930	6,210	9,335	11,554	13,098	13,580	7
8	Distribution (see Workpaper 3-MTD)	713	3,516	6,234	9,074	11,708	13,923	14,679	8
9	Total Depreciation Revenue	\$ 1,243	\$ 6,446	\$ 12,444	\$ 18,409	\$ 23,262	\$ 27,021	\$ 28,259	9
<b>Deferred Depreciation Revenue</b>									
10	Transmission (see Workpaper 5-MTD)	41	899	4,000	7,192	8,193	5,805	3,309	10
11	Distribution (see Workpaper 5-MTD)	65	1,261	4,812	6,522	6,603	6,052	5,019	11
12	Total Deferred Depreciation Revenue	\$ 106	\$ 2,160	\$ 8,812	\$ 13,714	\$ 14,796	\$ 11,857	\$ 8,328	12
<b>Property Tax Revenue</b>									
13	Transmission (see Workpaper 6-MTD)	-	71	405	1,057	2,125	2,883	3,422	13
14	Distribution (see Workpaper 6-MTD)	-	115	592	1,197	2,032	2,781	3,490	14
15	Total Property Tax Revenue	\$ -	\$ 186	\$ 997	\$ 2,254	\$ 4,157	\$ 5,664	\$ 6,912	15
<b>O&amp;M Revenue</b>									
16	Transmission (see Workpaper 7-MTD)	1,266	4,813	4,450	4,773	2,166	1,317	(623)	16
17	Distribution (see Workpaper 7-MTD)	6,847	26,210	20,893	15,861	13,701	3,296	200	17
18	Total O&M Revenue	\$ 8,113	\$ 31,023	\$ 25,343	\$ 20,634	\$ 15,867	\$ 4,613	\$ (423)	18
<b>Plan Development Cost Amortization Revenue</b>									
19	Transmission (see Workpaper 8-MTD)	57	227	227	170	-	-	-	19
20	Distribution (see Workpaper 8-MTD)	60	242	242	181	-	-	-	20
21	Total Plan Development Revenue	\$ 117	\$ 469	\$ 469	\$ 351	\$ -	\$ -	\$ -	21
<b>Total Retail TDSIC Revenue</b>									
22	Transmission	\$ 3,431	\$ 18,011	\$ 39,041	\$ 68,296	\$ 83,199	\$ 84,345	\$ 81,225	22
23	Distribution	10,178	44,638	59,923	75,134	88,837	89,160	91,700	23
24	Total Revenue	\$ 13,609	\$ 62,649	\$ 98,964	\$ 143,430	\$ 172,036	\$ 173,505	\$ 172,925	24
25	Transmission	-	-	(8,409)	(14,274)	(15,508)	(13,681)	(13,175)	25
26	Distribution	-	-	-	-	-	-	-	26
27	Total Targeted Economic Development Adj (1)	\$ -	\$ -	\$ (8,409)	\$ (14,274)	\$ (15,508)	\$ (13,681)	\$ (13,175)	27
28	Transmission	\$ 3,431	\$ 18,011	\$ 30,632	\$ 54,022	\$ 67,691	\$ 70,664	\$ 68,050	28
29	Distribution	10,178	44,638	59,923	75,134	88,837	89,160	91,700	29
30	Total Revenue w/o Targeted Economic Dev	\$ 13,609	\$ 62,649	\$ 90,555	\$ 129,156	\$ 156,528	\$ 159,824	\$ 159,750	30

(1) Targeted Economic Development as a percentage of total investment

	Transmission:			Distribution:		
	Econ Dev	Total Inv	% of Econ Dev	Econ Dev	Total Inv	% of Econ Dev
2023	-	72,878	0.00%	-	118,310	0.00%
2024	-	197,387	0.00%	-	252,299	0.00%
2025	106,051	492,236	21.54%	-	472,503	0.00%
2026	147,228	704,297	20.90%	-	668,577	0.00%
2027	157,816	846,652	18.64%	-	848,965	0.00%
2028	157,816	972,757	16.22%	-	1,036,502	0.00%
2029	157,816	972,757	16.22%	-	1,036,502	0.00%

**Duke Energy Indiana, LLC**

Estimated Retail Revenue Increase Attributable To  
Duke Energy Indiana's TDSIC  
 without Targeted Economic Development  
 (Dollars In Thousands)

Line No.	Description	2024	2025	2026	2027	2028	2029	2030	Line No.
<b>Rate Group Allocation - Transmission</b>									
1	RS	38.587%	38.587%	38.587%	38.587%	38.587%	38.587%	38.587%	1
2	CS	5.417%	5.417%	5.417%	5.417%	5.417%	5.417%	5.417%	2
3	LLF - Secondary	17.483%	17.483%	17.483%	17.483%	17.483%	17.483%	17.483%	3
4	LLF - Primary	1.687%	1.687%	1.687%	1.687%	1.687%	1.687%	1.687%	4
5	LLF - Primary Direct	0.951%	0.951%	0.951%	0.951%	0.951%	0.951%	0.951%	5
6	LLF - Transmission	0.661%	0.661%	0.661%	0.661%	0.661%	0.661%	0.661%	6
7	HLF - Secondary	14.354%	14.354%	14.354%	14.354%	14.354%	14.354%	14.354%	7
8	HLF - Primary	6.625%	6.625%	6.625%	6.625%	6.625%	6.625%	6.625%	8
9	HLF - Primary Direct	6.076%	6.076%	6.076%	6.076%	6.076%	6.076%	6.076%	9
10	HLF - Transmission Common	3.933%	3.933%	3.933%	3.933%	3.933%	3.933%	3.933%	10
11	HLF - Transmission Bulk	2.461%	2.461%	2.461%	2.461%	2.461%	2.461%	2.461%	11
12	All Other	<u>1.765%</u>	<u>1.765%</u>	<u>1.765%</u>	<u>1.765%</u>	<u>1.765%</u>	<u>1.765%</u>	<u>1.765%</u>	12
13	Total	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	13
<b>Rate Group Allocation - Distribution</b>									
14	RS	56.535%	56.535%	56.535%	56.535%	56.535%	56.535%	56.535%	14
15	CS	5.666%	5.666%	5.666%	5.666%	5.666%	5.666%	5.666%	15
16	LLF - Secondary	17.530%	17.530%	17.530%	17.530%	17.530%	17.530%	17.530%	16
17	LLF - Primary	1.378%	1.378%	1.378%	1.378%	1.378%	1.378%	1.378%	17
18	LLF - Primary Direct	0.145%	0.145%	0.145%	0.145%	0.145%	0.145%	0.145%	18
19	LLF - Transmission	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	19
20	HLF - Secondary	12.032%	12.032%	12.032%	12.032%	12.032%	12.032%	12.032%	20
21	HLF - Primary	4.465%	4.465%	4.465%	4.465%	4.465%	4.465%	4.465%	21
22	HLF - Primary Direct	0.728%	0.728%	0.728%	0.728%	0.728%	0.728%	0.728%	22
23	HLF - Transmission Common	0.003%	0.003%	0.003%	0.003%	0.003%	0.003%	0.003%	23
24	HLF - Transmission Bulk	-0.001%	-0.001%	-0.001%	-0.001%	-0.001%	-0.001%	-0.001%	24
25	All Other	<u>1.519%</u>	<u>1.519%</u>	<u>1.519%</u>	<u>1.519%</u>	<u>1.519%</u>	<u>1.519%</u>	<u>1.519%</u>	25
26	Total	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	<u>100.000%</u>	26
<b>Retail Revenue Allocated to Rate Group</b>									
27	RS	\$ 7,078	\$ 32,186	\$ 45,697	\$ 63,322	\$ 76,344	\$ 77,674	\$ 78,101	27
28	CS	763	3,505	5,055	7,183	8,700	8,880	8,882	28
	LLF								
29	LLF - Secondary	2,384	10,974	15,860	22,616	27,408	27,984	27,972	29
30	LLF - Primary	198	919	1,343	1,947	2,366	2,421	2,412	30
31	LLF - Primary Direct	47	236	378	623	773	801	780	31
32	LLF - Transmission	<u>23</u>	<u>119</u>	<u>202</u>	<u>357</u>	<u>447</u>	<u>467</u>	<u>450</u>	32
33	Total LLF	2,652	12,248	17,783	25,543	30,994	31,673	31,614	33
	HLF								
34	HLF - Secondary	1,717	7,956	11,607	16,794	20,405	20,871	20,801	34
35	HLF - Primary	682	3,186	4,705	6,934	8,451	8,662	8,603	35
36	HLF - Primary Direct	283	1,419	2,297	3,829	4,760	4,943	4,802	36
37	HLF - Transmission Common	135	710	1,207	2,127	2,665	2,782	2,679	37
38	HLF - Transmission Bulk	<u>84</u>	<u>443</u>	<u>753</u>	<u>1,329</u>	<u>1,665</u>	<u>1,738</u>	<u>1,674</u>	38
39	Total HLF	2,901	13,714	20,569	31,013	37,946	38,996	38,559	39
40	All Other	<u>215</u>	<u>996</u>	<u>1,451</u>	<u>2,095</u>	<u>2,544</u>	<u>2,601</u>	<u>2,594</u>	40
41	Total	<u>\$ 13,609</u>	<u>\$ 62,649</u>	<u>\$ 90,555</u>	<u>\$ 129,156</u>	<u>\$ 156,528</u>	<u>\$ 159,824</u>	<u>\$ 159,750</u>	41

**Duke Energy Indiana, LLC**

Estimated Retail Revenue Increase Attributable To  
Duke Energy Indiana's TDSIC  
 without Targeted Economic Development  
 (Dollars In Thousands)

Line No.	Description	2024	2025	2026	2027	2028	2029	2030	Line No.	
<b>Annual Retail Revenue Increase Over Prior Year</b>										
1	RS	\$ 7,078	\$ 25,108	\$ 13,511	\$ 17,625	\$ 13,022	\$ 1,330	\$ 427	1	
2	CS	763	2,742	1,550	2,128	1,517	180		2	
	LLF									
3	LLF - Secondary	2,384	8,590	4,886	6,756	4,792	576	(12)	3	
4	LLF - Primary	198	721	424	604	419	55	(9)	4	
5	LLF - Primary Direct	47	189	142	245	150	28	(21)	5	
6	LLF - Transmission	23	96	83	155	90	20	(17)	6	
7	Total LLF	2,652	9,596	5,535	7,760	5,451	679	(59)	7	
	HLF									
8	HLF - Secondary	1,717	6,239	3,651	5,187	3,611	466	(70)	8	
9	HLF - Primary	682	2,504	1,519	2,229	1,517	211	(59)	9	
10	HLF - Primary Direct	283	1,136	878	1,532	931	183	(141)	10	
11	HLF - Transmission Common	135	575	497	920	538	117	(103)	11	
12	HLF - Transmission Bulk	84	359	310	576	336	73	(64)	12	
13	Total HLF	2,901	10,813	6,855	10,444	6,933	1,050	(437)	13	
14	All Other	215	781	455	644	449	57	(7)	14	
15	Total	\$ 13,609	\$ 49,040	\$ 27,906	\$ 38,601	\$ 27,372	\$ 3,296	\$ (74)	15	
<b>Cumulative Percentage Increase over Twelve Months Ended June 2021 Retail Revenue</b>										
		TME June 2021								
16	RS	\$ 1,135,484	0.62%	2.83%	4.02%	5.58%	6.72%	6.84%	6.88%	16
17	CS	125,976	0.61%	2.78%	4.01%	5.70%	6.91%	7.05%	7.05%	17
	LLF									
18	LLF - Secondary	416,618	0.57%	2.63%	3.81%	5.43%	6.58%	6.72%	6.71%	18
19	LLF - Primary	54,830	0.36%	1.68%	2.45%	3.55%	4.32%	4.42%	4.40%	19
20	LLF - Primary Direct	19,700	0.24%	1.20%	1.92%	3.16%	3.92%	4.07%	3.96%	20
21	LLF - Transmission	8,337	0.28%	1.43%	2.42%	4.28%	5.36%	5.60%	5.40%	21
22	Total LLF	499,485	0.53%	2.45%	3.56%	5.11%	6.21%	6.34%	6.33%	22
	HLF									
23	HLF - Secondary	323,234	0.53%	2.46%	3.59%	5.20%	6.31%	6.46%	6.44%	23
24	HLF - Primary	127,023	0.54%	2.51%	3.70%	5.46%	6.65%	6.82%	6.77%	24
25	HLF - Primary Direct	143,315	0.20%	0.99%	1.60%	2.67%	3.32%	3.45%	3.35%	25
26	HLF - Transmission Common	73,745	0.18%	0.96%	1.64%	2.88%	3.61%	3.77%	3.63%	26
27	HLF - Transmission Bulk	82,613	0.10%	0.54%	0.91%	1.61%	2.02%	2.10%	2.03%	27
28	Total HLF	749,930	0.39%	1.83%	2.74%	4.14%	5.06%	5.20%	5.14%	28
29	All Other	87,721	0.25%	1.14%	1.65%	2.39%	2.90%	2.97%	2.96%	29
30	Total	\$ 2,598,596	0.52%	2.41%	3.48%	4.97%	6.02%	6.15%	6.15%	30
<b>Annual Percentage Increase over Prior Year Retail Revenue (2)</b>										
31	RS		0.62%	2.20%	1.16%	1.49%	1.09%	0.11%	0.04%	31
32	CS		0.61%	2.16%	1.20%	1.62%	1.14%	0.13%	0.00%	32
	LLF									
33	LLF - Secondary		0.57%	2.05%	1.14%	1.56%	1.09%	0.13%	(0.00%)	33
34	LLF - Primary		0.36%	1.31%	0.76%	1.08%	0.74%	0.10%	(0.02%)	34
35	LLF - Primary Direct		0.24%	0.96%	0.71%	1.22%	0.74%	0.14%	(0.10%)	35
36	LLF - Transmission		0.28%	1.15%	0.98%	1.82%	1.04%	0.23%	(0.19%)	36
37	Total LLF		0.53%	1.91%	1.08%	1.50%	1.04%	0.13%	(0.01%)	37
	HLF									
38	HLF - Secondary		0.53%	1.92%	1.10%	1.55%	1.06%	0.14%	(0.02%)	38
39	HLF - Primary		0.54%	1.96%	1.17%	1.69%	1.13%	0.16%	(0.04%)	39
40	HLF - Primary Direct		0.20%	0.79%	0.61%	1.05%	0.63%	0.12%	(0.10%)	40
41	HLF - Transmission Common		0.18%	0.78%	0.67%	1.23%	0.71%	0.15%	(0.13%)	41
42	HLF - Transmission Bulk		0.10%	0.43%	0.37%	0.69%	0.40%	0.09%	(0.08%)	42
43	Total HLF		0.39%	1.44%	0.90%	1.36%	0.89%	0.13%	(0.06%)	43
44	All Other		0.25%	0.89%	0.51%	0.72%	0.50%	0.06%	(0.01%)	44
45	Total		0.52%	1.88%	1.05%	1.44%	1.00%	0.12%	(0.00%)	45

(2) Prior Year Retail Revenue = Twelve Months Ended June 2021 Retail Revenue + prior year TDSIC Rider Revenue.

**Duke Energy Indiana, LLC**

Estimated Retail Revenue Increase Attributable To  
Duke Energy Indiana's TDSIC  
with Targeted Economic Development  
(Dollars In Thousands)

Line No.	Description	2024	2025	2026	2027	2028	2029	2030	Line No.
<b>Total Retail TDSIC Revenue</b>									
1	Transmission (see Exhibit 6-A (MTD), page 1)	\$ 3,431	\$ 18,011	\$ 39,041	\$ 68,296	\$ 83,199	\$ 84,345	\$ 81,225	1
2	Distribution (see Exhibit 6-A (MTD), page 1)	\$ 10,178	\$ 44,638	\$ 59,923	\$ 75,134	\$ 88,837	\$ 89,160	\$ 91,700	2
3	Total Revenue	\$ 13,609	\$ 62,649	\$ 98,964	\$ 143,430	\$ 172,036	\$ 173,505	\$ 172,925	3
<b>Rate Group Allocation - Transmission</b>									
1	RS	38.587%	38.587%	38.587%	38.587%	38.587%	38.587%	38.587%	1
2	CS	5.417%	5.417%	5.417%	5.417%	5.417%	5.417%	5.417%	2
3	LLF - Secondary	17.483%	17.483%	17.483%	17.483%	17.483%	17.483%	17.483%	3
4	LLF - Primary	1.687%	1.687%	1.687%	1.687%	1.687%	1.687%	1.687%	4
5	LLF - Primary Direct	0.951%	0.951%	0.951%	0.951%	0.951%	0.951%	0.951%	5
6	LLF - Transmission	0.661%	0.661%	0.661%	0.661%	0.661%	0.661%	0.661%	6
7	HLF - Secondary	14.354%	14.354%	14.354%	14.354%	14.354%	14.354%	14.354%	7
8	HLF - Primary	6.625%	6.625%	6.625%	6.625%	6.625%	6.625%	6.625%	8
9	HLF - Primary Direct	6.076%	6.076%	6.076%	6.076%	6.076%	6.076%	6.076%	9
10	HLF - Transmission Common	3.933%	3.933%	3.933%	3.933%	3.933%	3.933%	3.933%	10
11	HLF - Transmission Bulk	2.461%	2.461%	2.461%	2.461%	2.461%	2.461%	2.461%	11
12	All Other	1.765%	1.765%	1.765%	1.765%	1.765%	1.765%	1.765%	12
13	Total	100.000%	100.000%	100.000%	100.000%	100.000%	100.000%	100.000%	13
<b>Rate Group Allocation - Distribution</b>									
14	RS	56.535%	56.535%	56.535%	56.535%	56.535%	56.535%	56.535%	14
15	CS	5.666%	5.666%	5.666%	5.666%	5.666%	5.666%	5.666%	15
16	LLF - Secondary	17.530%	17.530%	17.530%	17.530%	17.530%	17.530%	17.530%	16
17	LLF - Primary	1.378%	1.378%	1.378%	1.378%	1.378%	1.378%	1.378%	17
18	LLF - Primary Direct	0.145%	0.145%	0.145%	0.145%	0.145%	0.145%	0.145%	18
19	LLF - Transmission	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	19
20	HLF - Secondary	12.032%	12.032%	12.032%	12.032%	12.032%	12.032%	12.032%	20
21	HLF - Primary	4.465%	4.465%	4.465%	4.465%	4.465%	4.465%	4.465%	21
22	HLF - Primary Direct	0.728%	0.728%	0.728%	0.728%	0.728%	0.728%	0.728%	22
23	HLF - Transmission Common	0.003%	0.003%	0.003%	0.003%	0.003%	0.003%	0.003%	23
24	HLF - Transmission Bulk	-0.001%	-0.001%	-0.001%	-0.001%	-0.001%	-0.001%	-0.001%	24
25	All Other	1.519%	1.519%	1.519%	1.519%	1.519%	1.519%	1.519%	25
26	Total	100.000%	100.000%	100.000%	100.000%	100.000%	100.000%	100.000%	26
<b>Retail Revenue Allocated to Rate Group</b>									
27	RS	\$ 7,078	\$ 32,186	\$ 48,942	\$ 68,830	\$ 82,328	\$ 82,953	\$ 83,185	27
28	CS	\$ 763	\$ 3,505	\$ 5,510	\$ 7,957	\$ 9,540	\$ 9,621	\$ 9,596	28
<b>LLF</b>									
29	LLF - Secondary	2,384	10,974	17,330	25,111	30,119	30,376	30,276	29
30	LLF - Primary	198	919	1,484	2,188	2,628	2,652	2,634	30
31	LLF - Primary Direct	47	236	458	758	920	931	905	31
32	LLF - Transmission	23	119	258	451	550	558	537	32
33	Total LLF	2,652	12,248	19,530	28,508	34,217	34,517	34,352	33
<b>HLF</b>									
34	HLF - Secondary	1,717	7,956	12,814	18,843	22,631	22,835	22,692	34
35	HLF - Primary	682	3,186	5,262	7,879	9,479	9,569	9,476	35
36	HLF - Primary Direct	283	1,419	2,808	4,697	5,702	5,774	5,603	36
37	HLF - Transmission Common	135	710	1,537	2,688	3,275	3,320	3,197	37
38	HLF - Transmission Bulk	84	443	960	1,680	2,047	2,075	1,998	38
39	Total HLF	2,901	13,714	23,381	35,787	43,134	43,573	42,966	39
40	All Other	215	996	1,601	2,348	2,817	2,814	2,826	40
41	Total	\$ 13,609	\$ 62,649	\$ 98,964	\$ 143,430	\$ 172,036	\$ 173,505	\$ 172,925	41

**Duke Energy Indiana, LLC**

**Estimated Retail Revenue Increase Attributable To  
 Duke Energy Indiana's TDSIC  
 with Targeted Economic Development  
 (Dollars In Thousands)**

Line No.	Description	2024	2025	2026	2027	2028	2029	2030	Line No.
<b>Annual Retail Revenue Increase Over Prior Year</b>									
1	RS	\$ 7,078	\$ 25,108	\$ 16,756	\$ 19,888	\$ 13,498	\$ 625	\$ 232	1
2	CS	763	2,742	2,005	2,447	1,583	81	(25)	2
	LLF								
3	LLF - Secondary	2,384	8,590	6,356	7,781	5,008	257	(100)	3
4	LLF - Primary	198	721	565	704	440	24	(18)	4
5	LLF - Primary Direct	47	189	222	300	162	11	(26)	5
6	LLF - Transmission	23	96	139	193	99	8	(21)	6
7	Total LLF	2,652	9,596	7,282	8,978	5,709	300	(165)	7
	HLF								
8	HLF - Secondary	1,717	6,239	4,858	6,029	3,788	204	(143)	8
9	HLF - Primary	682	2,504	2,076	2,617	1,600	90	(93)	9
10	HLF - Primary Direct	283	1,136	1,389	1,889	1,005	72	(171)	10
11	HLF - Transmission Common	135	575	827	1,151	587	45	(123)	11
12	HLF - Transmission Bulk	84	359	517	720	367	28	(77)	12
13	Total HLF	2,901	10,813	9,667	12,406	7,347	439	(607)	13
14	All Other	215	781	605	747	469	24	(15)	14
15	Total	\$ 13,609	\$ 49,040	\$ 36,315	\$ 44,466	\$ 28,606	\$ 1,469	\$ (580)	15

**Cumulative Percentage Increase over Twelve Months Ended June 2021 Retail Revenue**

		TME June 2021								
16	RS	\$ 1,135,484	0.62%	2.83%	4.31%	6.06%	7.25%	7.31%	7.33%	16
17	CS	125,976	0.61%	2.78%	4.37%	6.32%	7.57%	7.64%	7.62%	17
	LLF									
18	LLF - Secondary	416,618	0.57%	2.63%	4.16%	6.03%	7.23%	7.29%	7.27%	18
19	LLF - Primary	54,830	0.36%	1.68%	2.71%	3.99%	4.79%	4.84%	4.80%	19
20	LLF - Primary Direct	19,700	0.24%	1.20%	2.32%	3.85%	4.67%	4.73%	4.59%	20
21	LLF - Transmission	8,337	0.28%	1.43%	3.09%	5.41%	6.60%	6.69%	6.44%	21
22	Total LLF	499,485	0.53%	2.45%	3.91%	5.71%	6.85%	6.91%	6.88%	22
	HLF									
23	HLF - Secondary	323,234	0.53%	2.46%	3.96%	5.83%	7.00%	7.06%	7.02%	23
24	HLF - Primary	127,023	0.54%	2.51%	4.14%	6.20%	7.46%	7.53%	7.46%	24
25	HLF - Primary Direct	143,315	0.20%	0.99%	1.96%	3.28%	3.98%	4.03%	3.91%	25
26	HLF - Transmission Common	73,745	0.18%	0.96%	2.08%	3.64%	4.44%	4.50%	4.34%	26
27	HLF - Transmission Bulk	82,613	0.10%	0.54%	1.16%	2.03%	2.48%	2.51%	2.42%	27
28	Total HLF	749,930	0.39%	1.83%	3.12%	4.77%	5.75%	5.81%	5.73%	28
29	All Other	87,721	0.25%	1.14%	1.83%	2.68%	3.21%	3.24%	3.22%	29
30	Total	\$ 2,598,596	0.52%	2.41%	3.81%	5.52%	6.62%	6.68%	6.65%	30

**Annual Percentage Increase over Prior Year Retail Revenue (3)**

31	RS	0.62%	2.20%	1.43%	1.68%	1.12%	0.05%	0.02%	31
32	CS	0.61%	2.16%	1.55%	1.86%	1.18%	0.06%	(0.02%)	32
	LLF								
33	LLF - Secondary	0.57%	2.05%	1.49%	1.79%	1.13%	0.06%	(0.02%)	33
34	LLF - Primary	0.36%	1.31%	1.01%	1.25%	0.77%	0.04%	(0.03%)	34
35	LLF - Primary Direct	0.24%	0.96%	1.11%	1.49%	0.79%	0.05%	(0.13%)	35
36	LLF - Transmission	0.28%	1.15%	1.64%	2.25%	1.13%	0.09%	(0.24%)	36
37	Total LLF	0.53%	1.91%	1.42%	1.73%	1.08%	0.06%	(0.03%)	37
	HLF								
38	HLF - Secondary	0.53%	1.92%	1.47%	1.79%	1.11%	0.06%	(0.04%)	38
39	HLF - Primary	0.54%	1.96%	1.59%	1.98%	1.19%	0.07%	(0.07%)	39
40	HLF - Primary Direct	0.20%	0.79%	0.96%	1.29%	0.68%	0.05%	(0.11%)	40
41	HLF - Transmission Common	0.18%	0.78%	1.11%	1.53%	0.77%	0.06%	(0.16%)	41
42	HLF - Transmission Bulk	0.10%	0.43%	0.62%	0.86%	0.44%	0.03%	(0.09%)	42
43	Total HLF	0.39%	1.44%	1.27%	1.60%	0.94%	0.06%	(0.08%)	43
44	All Other	0.25%	0.89%	0.68%	0.84%	0.52%	0.03%	(0.02%)	44
45	Total	0.52%	1.88%	1.36%	1.65%	1.04%	0.05%	(0.02%)	45

(3) Prior Year Retail Revenue = Twelve Months Ended June 2021 Retail Revenue + prior year TDSIC Rider Revenue.

## VERIFICATION

I hereby verify under the penalties of perjury that the foregoing representations are true to the best of my knowledge, information and belief.

Signed: *Maria T. Diaz*  
Maria T. Diaz

Dated: November 23, 2021