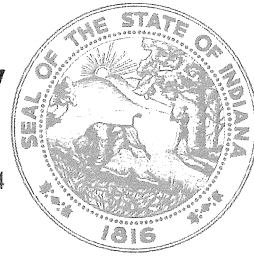


## Indiana Office of Utility Consumer Counselor

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February 23, 2021

OFFICIAL  
EXHIBITS

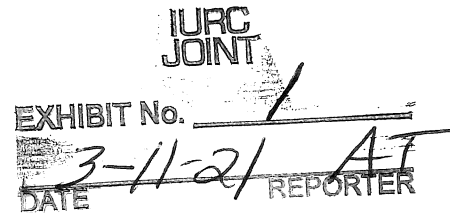
**VIA ELECTRONIC MAIL**

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Re: IURC Cause No. 45472  
NIPSCO, LLC  
OUCC Data Response Set No. 1

Dear Counselors:



Please find the OUCC's response to NIPSCO's Data Request Set No. 1.  
Please call if you have any questions.

Sincerely,

  
T. Jason Haas  
Deputy Consumer Counselor

TJH/kdr  
Enclosure

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S**  
**OBJECTIONS AND RESPONSES TO NIPSCO, LLC**

**GENERAL OBJECTIONS**

1. The OUCC objects generally to the Data Requests to the extent that they seek to discover information or the production of documents covered by the attorney-client privilege or the work product doctrine and any other applicable privileges. If privileged information or documents are inadvertently produced, the OUCC does not waive or intend to waive any privilege pertaining to such information or documents or to any other information or documents.
2. In responding to the Data Requests, the OUCC does not waive or intend to waive:
  - (a) Objections to competency, relevancy, materiality and admissibility;
  - (b) Rights to object on any ground to the use of any of the material provided or responses made pursuant to the Data Requests in any subsequent proceedings, including the litigation of this or any other action;
  - (c) Objections as to vagueness and ambiguity; and
  - (d) Rights to object further on any ground to these or any other data requests in this proceeding.
3. The OUCC objects generally to the Data Requests to the extent that certain individual requests may purport to require the OUCC to perform a study, analysis; or statistical summary in order to supply the requested information.
4. The OUCC objects generally to the Data Requests to the extent terms such as "any," "each," "every," "all," "complete," and similar terms are overly broad and unduly burdensome.

5. The OUCC objects generally to the Data Requests to the extent that they require the OUCC to produce voluminous documents on the ground that such production is unduly burdensome.
6. The OUCC objects to the Data Requests to the extent that they purport to require the OUCC to supply information in a computer format other than the format in which the OUCC keeps such information.
7. The responses provided to these Requests have been prepared pursuant to a reasonable and diligent investigation and search for information requested. The responses reflect the information obtained before this date by the OUCC's representatives pursuant to a reasonable and diligent search and investigation conducted in connection with these Data requests in those areas where information is expected to be found. To the extent that the requests purport to require more than a reasonable and diligent search and investigation, the OUCC objects on grounds that include an undue burden or unreasonable expense.
8. The OUCC objects to any attempt by NIPSCO, LLC, by way of its preliminary instruction, to require the OUCC to supplement its responses to these Data Requests in any manner other than that set forth in Rule 26(E) of the Indiana Rules of Trial Procedure. The OUCC's duty to supplement its responses is governed exclusively by that Rule.
9. The OUCC objects to the Data Requests to the extent they seek documents or information which is not relevant to the subject matter of this proceeding and which are not reasonably calculated to lead to the discovery of admissible evidence.
10. The OUCC objects to the Data Requests to the extent the discovery sought is unreasonably cumulative or duplicative, or is obtainable from some other source that is more convenient, less burdensome, or less expensive.

11. The OUCC objects to the Data Requests to the extent they are vague and ambiguous and provide no basis from which the OUCC can determine what information is sought.

Without waiving these objections, the OUCC responds to the Data Requests in the manner set forth below.

**OUCC's Response to DR 1**

**Request No. 1-1:** Admit that NIPSCO provided updated analysis in its case-in-chief in this proceeding, beyond what it provided in its case-in-chief in Cause Nos. 45194 (Rosewater), 45310 (Indiana Crossroads), and 45403 (Brickyard / Greensboro), in the form of the "2020 portfolio analysis" provided and discussed by Patrick Augustine (Petitioner's Exh. No. 2). To the extent your response is anything other than an unqualified admission, please fully explain your response, including the reason(s) why the OUCC cannot admit this fact.

- a. Please explain whether the OUCC performed any analysis of the "2020 portfolio analysis" and related modeling Mr. Augustine presented in his direct testimony (Petitioner's Exh. No. 2). If so, please explain in detail what type of analysis the OUCC undertook and what it revealed. If not, please explain in detail why the OUCC did not perform such analysis.
- b. Please also explain whether the OUCC performed any analysis or comparison of the "2020 portfolio analysis" and related modeling Mr. Augustine presented in his direct testimony (Petitioner's Exh. No. 2) and the 2018 IRP analysis and modeling. If so, please explain in detail what type of comparison or analysis the OUCC undertook and what it revealed. If not, please explain in detail why the OUCC did not perform such comparison or analysis.

**Objection:** The OUCC objects to this Request on the grounds and to the extent the Request is vague and ambiguous as the phrase "updated analysis...beyond what was provided" is not defined and is unclear. Additionally, the OUCC objects to this Request to the extent that the Request seeks an analysis that it has not performed and that the OUCC objects to performing.

**Response:** Subject to and without waiver of the foregoing general and specific objections, the OUCC provides the following response:

As described in the testimony of Dr. Boerger (p.2, ll.12 through p.5, ll.6), and as noted in the Request itself, Patrick Augustine's testimony in its case-in-chief presents IRP modeling that was revised compared to its 2018 IRP modeling.

- a. The OUCC read the direct testimony of Mr. Augustine and reflected on the words he used in that testimony, leading to an understanding of the changes he indicated in testimony. This lead the OUCC to realize the size of the task that would be involved in determining and requesting relevant documents and the multiple meetings and further time for review and reflection that would be required to review this new analysis. To the extent that such reflection and development of understanding constitutes an analysis, then the OUCC performed an analysis.
- b. The OUCC participated in various meetings and reviewed various documents at the time of NIPSCO's 2018 IRP process. Regarding NIPSCO's "2020 portfolio analysis," the OUCC read the direct testimony of Mr. Augustine and reflected on the words he used in that testimony, leading to an understanding of the changes he indicated in testimony. This also led the OUCC to realize the size of the task that would be involved in determining and requesting relevant documents and the multiple meetings and further time for review and reflection that would be required to review this new analysis. To the extent that such review, reflection, and development of understanding constitutes an analysis, then the OUCC performed an analysis. However, the OUCC did not perform calculations or review detailed modeling inputs, outputs and modeling choices for the "2020 portfolio analysis," as the OUCC determined from reading Mr. Augustine's testimony that an adequate review would not be feasible in the time frame of the statutorily time-constrained proceeding under which NIPSCO chose to file this case. The OUCC's choice was to not waste resources performing a detailed analysis of revised modeling that would be futile under the time constraints under which NIPSCO chose to file this case, with that modeling additionally not appearing to reflect potentially significant changes that have occurred since NIPSCO's 2018 IRP and that were not included in NIPSCO's revised modeling.

**Request No. 1-2:** Admit that, as of the date of this Request, the OUCC has not submitted any discovery requests seeking information related to the “2020 portfolio analysis” discussed by Patrick Augustine in his direct testimony (Petitioner’s Exh. No. 2). To the extent your response is anything other than an unqualified admission, please fully explain your response, including the reason(s) why the OUCC cannot admit this fact.

**Objection:** The OUCC objects to this Request on the grounds and to the extent that this Request seeks documents or information that are not relevant to the subject matter of this proceeding and is therefore not reasonably calculated to lead to the discovery of admissible evidence. It is not the responsibility of the OUCC to seek specific information not provided by a petitioner in its case-in-chief. The Commission has previously stated:

[The Petitioner] is reminded that it bears the burden of proof in demonstrating it is entitled to its requested relief. The OUCC should not have to request or otherwise seek basic supporting documentation that should have been provided with Petitioner's case-in-chief to support its requested relief.<sup>1</sup>

**Response:** Subject to and without waiver of the foregoing general and specific objections, the OUCC provides the following response:

Admit.

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<sup>1</sup> *City of Evansville, Indiana*, Cause No. 45073, Order of the Commission, at p. 8 (December 19, 2018).

**Request No. 1-3:** Admit that NIPSCO offered to hold discovery-related discussions with the OUCC related to the “2020 portfolio analysis” discussed by Patrick Augustine (Petitioner’s Exh. No. 2) but that, as of the date of this Request, the OUCC did not in fact engage in any discussions with NIPSCO regarding the 2020 Portfolio Analysis. To the extent your response is anything other than an unqualified admission, please fully explain your response, including the reason(s) why the OUCC cannot admit this fact.

**Objection:** The OUCC objects to this Request on the grounds and to the extent that this Request seeks documents or information that are not relevant to the subject matter of this proceeding and is therefore not reasonably calculated to lead to the discovery of admissible evidence. It is not the responsibility of the OUCC to seek specific information not provided by a petitioner in its case-in-chief. The Commission has previously stated:

[The Petitioner] is reminded that it bears the burden of proof in demonstrating it is entitled to its requested relief. The OUCC should not have to request or otherwise seek basic supporting documentation that should have been provided with Petitioner's case-in-chief to support its requested relief.<sup>2</sup>

**Response:** Subject to and without waiver of the foregoing general and specific objections, the OUCC provides the following response:

Admit.

---

<sup>2</sup> *City of Evansville, Indiana*, Cause No. 45073, Order of the Commission, at p. 8 (December 19, 2018).

**Request No. 1-4:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 4, lines 2-4, which states "Perhaps most importantly, the totality of these changes cannot be properly reviewed under the constraints of the statute under which NIPSCO chose to file this case—IC 8-1-8.8, allowing only 120 days from date of filing to date of Commission final order."

- a. Confirm that the "changes" referred to on page 4, line 2, and the "changes" referred to on line 18 of page 3 and line 1 of page 4 are all referring to the same "changes." To the extent they refer to different kinds of changes, please explain the differences between and among these references.
- b. Confirm that these three references to "changes" refer to purported changes to NIPSCO's 2018 IRP modelling approach, as discussed on pages 2-3 of Dr. Boerger's testimony. To the extent he is referring to a change to some other kind of modelling, identify what Dr. Boerger is referring to.
- c. Please identify with specificity each "change" Dr. Boerger is referring to on pages 3 and 4 of his testimony.

**Response:**

- a. Confirm. The term "changes," referred to on page 3, line 18, and page 4, lines 1 and 2, are all referring to the same "changes."
- b. Changes to NIPSCO's modelling approach are discussed primarily from p. 3, ll. 12 to p. 4, ll. 2 of Dr. Boerger's testimony. Subject to that clarification of page and line numbers, confirm. The changes referred to in this passage of Dr. Boerger's testimony are changes to NIPSCO's modeling and assumptions used in its 2018 IRP, as described in Mr. Augustine's direct testimony on p. 15, ll. 15 to p. 25, ll. 4.
- c. The changes referred to by Dr. Boerger in the referenced lines are the changes presented in the Mr. Augustine's direct testimony from p. 14, ll. 12 to p. 25, ll. 4, in the section titled "NIPSCO's Phase II RFPs and Subsequent Analysis." Mr. Augustine describes changes in NIPSCO's system and other market conditions (Q/A 19, p. 16, ll. 9 to p. 17, ll. 1), including an "introduction of stochastic renewable output variability to the risk analysis" (p. 16, ll. 19 to p. 17, ll. 1); changes to NIPSCO's electric load forecast (Q/As 20 and 21, p. 17, ll. 2 to p. 18, ll. 2); changes to NIPSCO's commodity price outlook (Q/A 23, p. 19, ll. 12 to p. 20, ll. 6); changed assumptions for accreditation of solar resources (Q/A 24 on p. 20, lls. 7 to 13); and revised portfolio concepts that were evaluated (Q/As 25 through 27, p. 21, ll. 1 to p. 24, ll. 68).



**Request No. 1-5:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 4, line 15 through p. 5, line 6. NIPSCO understands that this portion of Dr. Boerger's testimony is referring to, at least, potential changes to NIPSCO's electric load and ongoing MISO initiatives.

- a. Other than these two changes, please identify with specificity all "other significant changes" referred to by Dr. Boerger in this portion of his testimony.

**Objection:** The OUCC objects to this Request on the grounds and to the extent that this Request is vague and ambiguous as the term "all 'other significant changes'" is not defined and is unclear.

**Response:** Subject to and without waiver of the foregoing general and specific objections, the OUCC provides the following response:

- a. Dr. Boerger on the referenced lines is referring to a number of significant matters that he does not see in NIPSCO's testimony describing updated IRP assumptions and modeling. For instance, the RIIA initiative referenced in Mr. Augustine's testimony (p. 20, fn. 12 and p. 21, fn. 14), which gave rise to NIPSCO's changed modeling as pertains to solar accreditation, is studying aspects of the increased penetration of intermittent resources in the MISO footprint beyond just solar accreditation, including an "energy adequacy focus," defined on page 3 of MISO's RIIA "Assumptions Version 6" document as "the ability of a system to be operated continuously. This involves analysis of ramping, over/under production, capacity factors, coordination, operating reserves and congestion." That document also outlines an "Operating Reliability" focus, defined on page 3 as "the ability of the system to withstand sudden disturbances to system stability or unanticipated loss of system components." Any requirements that MISO imposes to address issues identified in these areas will likely incur costs for utilities with increasing levels of intermittent resources. Those costs should be seriously considered and estimates of such costs modeled. Additionally, developments in MISO's ongoing Resource Availability and Need initiative, also referenced in Mr. Augustine's testimony (p. 21, fn. 14), should be reviewed for possible modeling changes. In addition to reliability-related issues, effects of increasing levels of intermittent resources on hourly market prices should be studied, with developing understanding of such effects incorporated into updated modeling. Beyond those MISO-related matters, Dr. Boerger is also referring to recent and expected advancements in technological capabilities of generation resources; changes in expected costs of new generation

technologies; attempting to understand and incorporate recent increases in the cost of solar PPA prices in NIPSCO RFPs; updated information regarding customer demand; and any expected changes in RTO market rules. These concerns are based on Dr. Boerger's evaluation in this proceeding but does not exclude other concerns that may be raised based on further evaluation.

**Request No. 1-6:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 4, lines 15-17. Please specify the meaning of the phrase "all of these changes" as used on line 15. If this phrase is intended to include "changes" referred to in Request No. 1-4, Request 1-5, and/or both Request Nos. 1-4 and 1-5, please so state.

**Response:** The phrase "all of these changes" on the referenced lines refers to all of the changes that Dr. Boerger discusses earlier in that Q/A, including the changes that NIPSCO identified and included in its updated IRP modeling and the changes that Dr. Boerger identified that go beyond the changes modeled by NIPSCO in its revised IRP analysis prepared for this proceeding, discussed in Response No. 1-5.

**Request No. 1-7:**

Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 5, line 13 through p. 6, line 2. Please specify the meaning of the phrase "major changes happening in the electric utility industry" as used on lines 14-15 of page 5, including identifying with specificity each "change" to which Dr. Boerger is referring in this portion of testimony.

**Response:**

The OUCC responds that the referenced phrase is referring to the kinds of changes described earlier in his testimony, including the changes that NIPSCO identified and included in its updated IRP modeling and the changes that Dr. Boerger identified that go beyond the changes modeled by NIPSCO in its revised IRP analysis prepared for this proceeding, identified in Response No. 1-5.

**Request No. 1-8:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 6, lines 3-13.

- a. Admit that Dr. Boerger is saying that the Commission should not approve any new generation resources, no matter the size, NIPSCO may submit to the Commission *until NIPSCO completes its 2021 IRP process*. To the extent your response is anything other than an unqualified admission, please fully explain your response, including how NIPSCO could meet its burden of proof in this proceeding with something less than completing its 2021 IRP process.
- b. Admit that Dr. Boerger is saying that the Commission should not approve any new generation resources, no matter the size, NIPSCO may submit to the Commission *based on the 2018 IRP*. To the extent your response is anything other than an unqualified admission, please fully explain your response, including how NIPSCO could meet its burden of proof in this proceeding with something less than completing a new IRP.
- c. Admit that Dr. Boerger is saying that the Commission should not approve any new generation resources, no matter the size, NIPSCO may submit to the Commission *based on the 2018 IRP, even as updated in the 2020 portfolio analysis*. To the extent your response is anything other than an unqualified admission, please fully explain your response, including how NIPSCO could meet its burden of proof in this proceeding with something less than completing a new IRP.

**Response:**

- a. Deny. Given that NIPSCO has in effect acknowledged through presentation of its updated IRP modeling that its 2018 IRP modeling is no longer applicable, as noted in Mr. Augustine's direct testimony, p. 16, lls. 2-8, along with Dr Boerger's concerns about additional information that should be incorporated into NIPSCO's modeling, the OUCC cannot support issuance of CPCNs at this time based upon the information presented in this proceeding without having the opportunity to fully evaluate the updated IRP modeling. If NIPSCO had filed its request for a CPCN separately from and untied to its request under IC 8-1-8.8, a reasonable procedural schedule could have been set for review of IRP modeling outside of the 120-day constraints of IC 8-1-8.8. Thus, the OUCC is not seeking the Commission to require that NIPSCO's 2021 IRP be completed before any additional generation proposals are approved. Rather, the OUCC is simply taking the position that the manner in which NIPSCO filed this case does not provide adequate time for review and notes that NIPSCO is beginning its 2021 IRP process which, by its nature, does provide time for review. For historical reference, the OUCC did not seek for Southern Indiana Gas and Electric Company (known then as "Vectren

South" and known now as "CenterPoint") to wait until its then subsequent IRP was completed to present the updated modeling it performed for Cause No. 45052. A reasonable procedural schedule was able to be set in that case, which provided 143 days for the OUCC to review testimony, because the case was filed under IC 8-1-2.5, as under which NIPSCO could have requested its CPCN in this proceeding separate and apart from its request under IC 8-1-8.8.

- b. Admit. NIPSCO presented evidence revising the 2018 IRP with the "2020 portfolio analysis." Given that NIPSCO has in effect acknowledged through presentation of its updated IRP modeling that its 2018 IRP modeling is no longer applicable, as noted in Mr. Augustine's direct testimony, p. 16, lls. 2-8, and Dr. Boerger's further concerns about other factors that have changed since NIPSCO's 2018 IRP modeling was conducted, Dr. Boerger concludes NIPSCO's 2018 IRP is no longer a valid foundation for making decisions regarding implementation of the Short-Term Action Plan arising from that IRP. Compliance with a utility's most recent IRP is not sufficient grounds for the granting of a CPCN. The projects must be shown to be reasonable and necessary at the time of approval, not at the time of the last IRP.
- c. See answers to parts 'a' and 'b' of this question.

**Request No. 1-9:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 4, line 13 through p. 5, line 2, where he states: "Given three years have elapsed since NIPSCO's 2018 IRP, and given the major changes happening in the electric utility industry, NIPSCO must perform a comprehensive update of its IRP modeling and provide sufficient time for the OUCC and other stakeholders to review that modeling. Until that is done, there will not be sufficient evidence to judge the reasonableness of NIPSCO's resource expansion proposals."

- a. If NIPSCO were to complete "a comprehensive update of [NIPSCO's] IRP modeling" that the OUCC advocates should be required, please identify the *minimum* amount of time the OUCC believes should be allowed for "the OUCC and other stakeholders to review" this updated IRP modeling.
- b. Understanding that the OUCC was an active participant in NIPSCO's 2018 IRP process and has also been actively involved in several proceedings before the Commission where the 2018 IRP has provided and relied upon the 2018 IRP, please identify the *minimum* amount of time the OUCC believes should be allowed for the OUCC to review the "2020 portfolio analysis" provided by Mr. Augustine in Petitioner's Exh. No. 2.

**Objection:** The OUCC objects to this Request on the grounds and to the extent that this Request calls for speculation. The amount of time needed will vary within the specific request and other factors at play at the time a petition is made.

**Response:** Subject to and without waiver of the foregoing general and specific objections, the OUCC provides the following response:

- a. A typical IRP stakeholder process takes perhaps 8 to 10 months to complete plus a number of additional months for development of comments. The OUCC would not require that length of time to review a comprehensive update of NIPSCO's new IRP modeling in a CPCN proceeding. For historical reference, in Cause No. 45052, the OUCC did not seek for Southern Indiana Gas and Electric Company (known then as "Vectren South" and known now as "CenterPoint") to wait until its then subsequent IRP was completed to present the updated modeling it performed in that proceeding. A reasonable procedural schedule was able to be set in that case, which provided 143 days for the OUCC to review testimony, because the case was filed under Ind. Code ch. 8-1-2.5, as under which NIPSCO could have requested its CPCN in this proceeding separate and apart from its request under Ind. Code ch. 8-1-8.8. Whether or not 143 days of OUCC review time would be necessary in another cause would depend on the specific situation. But given the practical reality that NIPSCO is beginning its 2021 IRP process, it may be just as fast to go

through that 2021 IRP process rather than file a new CPCN application that provided a reasonable amount of time for OUCC review.

- b. See answer to part 'a' of this question.



**Request No. 1-10:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 5, line 13 through p. 6, line 2.

- a. Admit that NIPSCO is currently in compliance with the requirements of Indiana Code § 8-1-8.5-3(e)(2), as applied by the Commission to require submission of an Integrated Resource Plan at least every three years.

**Objection:** The OUCC objects to this Request to the extent the Request asks it to provide a legal conclusion.

**Response:** Subject to and without waiver of the foregoing general and specific objections, the OUCC provides the following response:

- a. Dr. Boerger is not aware of any requirements of the referenced statutory provision or the Commission's rules with which NIPSCO is out of compliance. That said, compliance with the referenced statutory provision is not sufficient for the granting of a CPCN.

**Request No. 1-11:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 5, line 13 through p. 6, line 2.

- a. In the opinion of the OUCC, how frequently should a utility in Indiana be required to perform a "comprehensive update of its IRP modeling" in order to have a valid foundation for proposed generation resource additions? Please fully explain your answer, including if or how the frequency should change based on the size or capital cost of such proposed additions.

**Response:**

- a. NIPSCO is required to submit an integrated resource plan every three years pursuant to 170 IAC § 4-7-2(a)(3). The OUCC does not recommend that this rule should be changed, and the referenced phrase is not implying so. Dr. Boerger is simply stating here his expert opinion that NIPSCO's revised modeling, as described in Mr. Augustine's direct testimony, does not sufficiently consider all of the significant changes that have occurred since NIPSCO's 2018 IRP. For that reason, and irrespective of the smaller magnitude of cost recovery at stake in this proceeding compared to Cause No. 45462, it is Dr. Boerger's opinion that an informed judgment as to the reasonableness and necessity of the proposed investments cannot be reasonably reached without a comprehensive update of NIPSCO's IRP modeling, to include but going beyond the considerations motivating the updated IRP modeling presented by NIPSCO in this proceeding.

**Request No. 1-12:** Please refer to Dr. Boerger's testimony (Public's Exh. No. 1) at p. 4, lines 10-14.

- a. Please identify with specificity the "ongoing MISO initiatives" referred to by Dr. Boerger in this portion of his testimony.

**Response:**

- a. The referenced phrase refers to the MISO Renewable Integration Impact Assessment ("RIIA") study and Resource Availability and Need initiative that were also referenced in the direct testimony of NIPSCO witness Mr. Augustine.

**Request No. 1-13:** Admit that Witness Augustine has accurately described the LCOE for the Green River Project, as provided in Question Answer 32, 33, and 34 of his direct testimony (Petitioner's Exh. No. 2). To the extent your response is anything other than an unqualified admission, please fully explain your response, including the reason(s) why the OUCC cannot admit this fact. Additionally, to the extent the OUCC is not able to admit this fact because it has not performed this analysis or calculation, please so state.

**Objection:** The OUCC objects to this Request on the grounds and to the extent that this Request seeks to have the OUCC independently verify the accuracy of each number and calculation presented in Mr. Augustine's testimony, and thus objects to this Request for admission as to the OUCC verifying the accuracy of the information presented.

**Response:** Subject to and without waiver of the foregoing general and specific objections, the OUCC provides the following response:

The OUCC has reviewed the spreadsheet provided by NIPSCO entitled "45472\_NIPSCO\_Confidential LCOE Eval Model Solar\_GreenRiver\_01082021.xlsx," and has confirmed that this spreadsheet presents values and calculations that result in the LCOE values for the Solar Projects presented in Mr. Augustine's testimony. The OUCC has not raised concerns in its testimony about these calculations.

**Request No. 1-14:** Please refer to Dr. Boerger's direct testimony in Cause No. 45043, p. 10, lines 14-18, where he recommends that "NIPSCO be required to incorporate the higher solar prices it now sees in a rerun of its IRP modeling, with that rerun also including expected effects from MISO's RIIA [sic] studies."

- a. Admit that the "2020 portfolio analysis" provided and discussed by Patrick Augustine (Petitioner's Exh. No. 2) incorporated the solar prices resulting from NIPSCO's Phase II RFPs. To the extent your response is anything other than an unqualified admission, please fully explain your response, including the reason(s) why the OUCC cannot admit this fact.
- b. If Dr. Boerger or the OUCC have not analyzed the 2020 portfolio analysis to determine if it included the solar prices resulting from NIPSCO's Phase II RFPs, please so state.
- c. Admit that the "2020 portfolio analysis" provided and discussed by Patrick Augustine (Petitioner's Exh. No. 2) included at least some aspects MISO's RIIA studies. To the extent your response is anything other than an unqualified admission, please fully explain your response, including the reason(s) why the OUCC cannot admit this fact.
- d. If Dr. Boerger or the OUCC have not analyzed the 2020 portfolio analysis to determine if it included the expected effects from at least some aspects of MISO's RIIA studies, please so state.

**Response:**

- a. Mr. Augustine's direct testimony p. 21, ll. 3 indicates that Phase II RFP bid responses were organized into tranches as part of implementing NIPSCO's 2020 portfolio analysis. To the extent that his modeling revisions performed such organization, then it would be logical to expect that the "2020 portfolio analysis" he performed incorporated solar prices from the Phase II RFP in some fashion.
- b. Dr. Boerger has not analyzed the "2020 portfolio analysis" to determine if it included the solar prices resulting from NIPSCO's Phase II RFPs.
- c. Dr. Boerger's testimony p. 3, ll. 15 to 18 notes NIPSCO's representation that it incorporated updated solar capacity accreditation in its "2020 portfolio analysis," which is one aspect of MISO's RIIA studies. Dr. Boerger did not see in NIPSCO's testimony references to incorporation of other aspects of MISO RIIA studies in its "2020 portfolio analysis."
- d. Dr. Boerger has not analyzed the "2020 portfolio analysis" to determine if it included the expected effects from at least some aspects of MISO's RIIA studies other than as stated in the Response to part (c).