



# OFFICIAL EXHIBITS

PETITIONER'S EXHIBIT 1

IURC CAUSE NO. 42736 RTO-57  
DIRECT TESTIMONY OF ART J. BUESCHER III  
FILED AUGUST 31, 2021

**TESTIMONY OF ART J. BUESCHER III  
LEAD RATES AND REGULATORY STRATEGY ANALYST  
DUKE ENERGY INDIANA, LLC  
CAUSE NO. 42736 RTO-57  
BEFORE THE INDIANA UTILITY REGULATORY COMMISSION**

IURC  
PETITIONER'S

**I. INTRODUCTION**

EXHIBIT NO. 1  
DATE 11-18-21 REPORTER AT

1

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

3 A. My name is Art J. Buescher III and my business address is 1000 East Main Street,  
4 Plainfield, Indiana 46168.

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

6 A. I am employed by Duke Energy Indiana, LLC ("Duke Energy Indiana,"  
7 "Petitioner" or "Company"), a wholly-owned subsidiary of Duke Energy  
8 Corporation ("Duke Energy"), as Lead Rates and Regulatory Strategy Analyst in  
9 Duke Energy Indiana's Rate Department.

10 **Q. WHAT ARE YOUR DUTIES AND RESPONSIBILITIES IN THE**  
11 **INDIANA RATE DEPARTMENT?**

12 A. As Lead Rates and Regulatory Strategy Analyst, I am responsible for the  
13 preparation of financial and accounting data used in Duke Energy's rate filings,  
14 including rate matters involving Duke Energy Indiana.

15 **Q. PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL AND**  
16 **EDUCATIONAL BACKGROUND.**

17 A. I graduated from of the University of Indianapolis in May of 1988 with a  
18 Bachelor of Science Degree in Accounting. I was employed by the Company in

**ART J. BUESCHER III**

1 June 1988. During my employment with the Company, I have held various  
2 financial and accounting positions supporting the Company and its affiliates.  
3 Prior to my move to the Rates and Regulatory Planning department in 2007, I  
4 held various financial and accounting positions in Cost Accounting, Internal  
5 Auditing, Energy Trading Accounting, and as Supervisor, Fuels and Joint  
6 Ownership Accounting.

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

9 A. My testimony in this proceeding supports the Company's request for approval of  
10 the proposed Rider No. 68 adjustment factors for the Company's Standard  
11 Contract Rider No. 68 ("Rider No. 68" or "RTO"), which includes a new  
12 projection as well as a reconciliation for prior historical periods. I will also  
13 explain any changes the Company is making to Rider No. 68 as a result of the  
14 Company's most recent retail base rate case approved by the Commission on June  
15 29, 2020, in Cause No. 45253 ("June 29, 2020 Order" or "Cause No. 45253").

16 **Q. WHAT MONTHS OF HISTORICAL COSTS AND TRANSMISSION**  
17 **REVENUES ARE COVERED BY THE COMPANY'S PETITION IN THIS**  
18 **PROCEEDING?**

19 A. The applicable non-fuel costs and transmission revenues for the reconciliation  
20 period of July 2020 through June 2021 are included in this proceeding.

1   **Q.    WHAT MONTHS OF PROJECTED COSTS AND TRANSMISSION**  
2       **REVENUES ARE COVERED BY THE COMPANY'S PETITION IN THIS**  
3       **PROCEEDING?**

4    A.   The forecasted amounts for applicable costs and transmission revenues are  
5       included for the months of January 2022 through December 2022.

6                                   **II. BACKGROUND**

7   **Q.    PLEASE BRIEFLY EXPLAIN YOUR UNDERSTANDING OF THE**  
8       **COMPANY'S RETAIL BASE RATE ORDERS RELEVANT TO THE**  
9       **COMPANY'S RIDER NO. 68.**

10   A.   In its May 18, 2004, Order in Cause No. 42359, the Commission first approved  
11       Rider No. 68 to track recovery from (or credit to) the Company's retail electric  
12       customers certain Company charges, credits and transmission revenues related to  
13       MISO. In the June 29, 2020, Order in Cause No. 45253 ("Current Base Rate  
14       Order"), the Company's most recent retail base rate case, the Commission  
15       approved Rider No. 68 to continue and to include, on a prospective basis, non-fuel  
16       charges and credits assessed from PJM Interconnection, LLC ("PJM"), as it  
17       relates to the Company's Madison Generating Station as further described in the  
18       prefiled testimony of Mr. James (Brad) Daniel in this proceeding.

19   **Q.    PLEASE EXPLAIN THE SPECIFIC CHANGES TO THE COMPANY'S**  
20       **RTO RIDER RESULTING FROM DUKE ENERGY INDIANA'S**  
21       **CURRENT BASE RATE ORDER.**

1 A. The Company's Current Base Rate Order made several prospective changes to the  
2 Company's Rider No. 68 filing, including the following:

- 3 • Added non-fuel related PJM charges and credits on a prospective basis  
4 to the comparable MISO amounts currently included in the rider;
- 5 • Updated the proposed annual base amounts for RTO non-fuel costs  
6 and RTO transmission revenues used in the rider calculation; and
- 7 • Modified the factor calculation for HLF customers to be billed on KW  
8 demand rather than on kWh sales.

9 **Q. ARE THERE OTHER KEY COMMISSION ORDERS THAT PROVIDE**  
10 **IMPORTANT BACKGROUND ON THE DEVELOPMENT OF THE**  
11 **COMPANY'S RIDER NO. 68?**

12 A. Yes. There are a few Commission Orders that have had a significant impact on  
13 the development of this rider. In the Commission's June 1, 2005, Order in Cause  
14 No. 42685 ("June 1, 2005 Order") the Commission addressed MISO's  
15 implementation of the Energy Markets. Specifically with respect to the  
16 Company, the June 1, 2005, Order determined that certain Duke Energy Indiana's  
17 Energy Markets charges (and credits) were fuel-related and should therefore be  
18 reflected in the Company's subsequent Fuel Cost Adjustment Standard Contract  
19 Rider No. 60 proceedings. The Order also found that Rider No. 68 should  
20 continue to provide for the Company's non-fuel related MISO cost recovery  
21 under Energy Markets operations.

1           The Commission later approved, in its December 19, 2007, Order in Cause  
2           No. 42736, the recovery of Schedule 26 ("Network Upgrade Charge from  
3           Transmission Expansion Plan") costs assessed the Company by MISO as part of  
4           the Regional Expansion and Criteria and Benefits ("RECB") process through  
5           Rider No. 68, whether those costs are associated with transmission projects of  
6           other transmission owners or whether those costs are associated with the  
7           Company's RECB projects. Furthermore in the June 25, 2008 Order in Cause No.  
8           42736, the Commission approved the Company's proposal for recovery of RECB  
9           Schedule 26 charges on Company-owned, MISO approved RECB transmission  
10          projects. Later in my testimony I provide further discussion on the regulatory  
11          treatment of the Company's RECB projects and Petitioner's Exhibit 1-G (AJB)  
12          provides information on these Company-owned, MISO approved RECB projects,  
13          including estimates of Schedule 26 costs.

14                 In the Commission's September 24, 2008 Order in Cause No. 42736 and  
15                 the Commission's June 30, 2009 Order in Cause No. 42736, the Commission  
16                 approved the Company's recovery of charges and credits associated with its  
17                 participation in the MISO Ancillary Services Market ("ASM"). Specifically, the  
18                 Company began including the following ASM charge types in its Rider No. 68  
19                 filings: (a) the Real Time Revenue Neutrality Uplift Amount exclusive of the  
20                 credits associated with the Contingency Reserve Deployment Failure Uplift  
21                 Amount; (b) the Day Ahead Market Administration Amount; and (c) the Real  
22                 Time Market Administration Amount. In its June 27, 2012 Order in Cause No.

42736, the Commission approved the recovery of Schedule 26-A ("Multi-Value Project Usage Rate" or "MVP") costs allocated to the Company by MISO for projects of other transmission owners through Rider No. 68, whether those costs are associated with transmission projects of other transmission owners. Later in my testimony, I provide further discussion on the regulatory treatment of the Company's MVP projects. Petitioner's Exhibit 1-H (AJB) provides information on these Company-owned, MISO approved MVP projects, including estimates of Schedule 26-A costs.

In the Commission's September 24, 2014 Order in Cause No. 42736, the Commission determined that the Real-Time MVP Distribution charge type assessed by MISO was properly includable in Rider No. 68. Furthermore, in the February 24, 2021 Order in Cause No. 42736, the Commission approved the recovery of Schedule 26-C (Cost Recovery For MISO Transmission Owner TEMPS), Schedule 26-D (Cost Recovery For PJM Transmission Owner TEMPS) and Schedule 49 (Cost Allocation For Available System Capacity Usage) costs allocated to the Company through Rider No. 68.

**Q. ARE THERE COMPANY-OWNED RECB PROJECTS IN THIS FILING FOR WHICH THE COMPANY IS SEEKING RECOVERY?**

A. Yes, the Company has three (3) RECB projects in service as of the end of 2016: (a) the first phase of a baseline reliability transmission line project spanning approximately four (4) miles and referred to by MISO as Project Number 852 completed in 2009 and the final phase spanning seventeen (17) miles completed

in 2013; (b) the Edwardsport 345 kV substation and line project referred to by MISO as Project Number 1263 completed in 2010; and (c) the Dresser substation and transformer project referred to by MISO as Project Number 2050 completed in 2011. In June of 2021, the Company submitted to MISO its revised annual revenue requirement for these projects for changes in the approved return on equity ("ROE"), which totaled \$3,010,499, and the Company, as a transmission owner, began receiving updated revenues July 1, 2021. These RECB projects are listed on Petitioner's Exhibit 1-G (AJB). The Company, as a transmission customer, also pays MISO its share of the corresponding Schedule 26 costs.

**Q. ARE THERE COMPANY-OWNED MVP PROJECTS IN THIS FILING FOR WHICH THE COMPANY IS SEEKING RECOVERY?**

A. Yes, the Company has two (2) MISO MVP projects. These two (2) projects consist of three (3) facilities which are comprised of eight (8) separate detail projects. The first detail project went in service May 2018, three (3) went in service June 2018, one (1) went in service June 2019, and one (1) went in service September 2019. The remaining two (2) detail projects are projected to be in service by December 2020. The three (3) facilities are as follows:

- MTEP Project ID 2237 is the Sugar Creek to Kansas 345 kV line project known as MISO Facility ID 8313, which consists of four (4) detail projects of which two (2) were in service at the end of 2019, and are therefore, included in the Company's MISO Attachment MM for

1 recovery through Schedule 26-A. The final two (2) detail projects are  
2 estimated to be in service by December 2020;

- 3 • MTEP Project ID 2202 is the Reconductor Wabash to Wabash  
4 Container Section project known as Facility ID 7286, which consists  
5 of two (2) detail projects of which both were in service as of June  
6 2018.
- 7 • MTEP Project ID 2202 is the Kokomo Delco to Greentown 138 kV  
8 Uprate project known as MISO Facility 7287, which consists of two  
9 (2) detail projects with the first in service May 2018 and the second in  
10 service June 2018.

11 In June of 2021, the Company submitted to MISO its revised annual  
12 revenue requirement for these projects for changes in the approved ROE, which  
13 totaled \$1,489,235, and the Company, as a transmission owner, began receiving  
14 revenues July 1, 2021.

15 **Q. HAS THE COMPANY EXCLUDED THE REVENUE RELATED TO**  
16 **THESE RECB AND MVP PROJECTS FROM THIS FILING?**

17 A. Yes, the Company has retained this revenue, as previously ordered by the  
18 Commission, and Rider No. 68 costs were not offset by the revenue from these  
19 projects.

20 **Q. HAS THE COMPANY EXCLUDED THE REVENUES AND EXPENSES**  
21 **RELATED TO THESE PROJECTS FROM THE FAC EARNINGS TEST?**



1 A. Yes, the Company has excluded the applicable revenues and expenses related to  
2 its own RECB and MVP Projects from the FAC Earnings Test. See the direct  
3 testimony of Company witness Suzanne E. Sieferman in Cause No. 38707 FAC-  
4 129, which discusses the adjustments to the Company's Earnings Test to exclude  
5 revenues and expenses associated with its own RECB and MVP projects.

6 **III. OVERVIEW OF RIDER NO. 68**

7 **Q. PLEASE BRIEFLY DESCRIBE THE COSTS AND TRANSMISSION**  
8 **REVENUES COVERED BY RIDER NO. 68.**

9 A. Under Rider No. 68, the Company will track for recovery from (or credit to) the  
10 Company's retail electric customers the following:

- 11 • MISO management costs billed to the Company by MISO under  
12 Schedules 10 (ISO Cost Recovery Adder) and 10-FERC (FERC  
13 Annual Charges Recovery);
- 14 • MISO management costs billed to the Company by MISO under  
15 Schedule 16 (Financial Transmission Rights Administrative Service  
16 Cost Recovery Adder);
- 17 • MISO management costs billed to the Company by MISO under  
18 Schedule 17 (Energy and Operating Reserve Markets Market Support  
19 Administrative Service Cost Recovery Adder);
- 20 • Costs billed to the Company by MISO under the MISO Tariff for  
21 standard market design which is allocable to the Company's retail  
22 electric customers (including charges under Schedule 26, Schedule 26-

1 A, Schedule 26-C, Schedule 26-D, Schedule 49, Real-Time Revenue  
2 Neutrality Uplift, Real Time Miscellaneous Amount and Real-Time  
3 MVP Distribution Amount);

- 4 • Other government mandated transmission costs the Company is  
5 required to pay on behalf of its retail electric customers;
- 6 • Certain MISO transmission revenues assigned to the Company,  
7 collected by MISO under the MISO Tariff, which are allocable to the  
8 Company's retail electric customers; and
- 9 • Costs billed to the Company by PJM under the PJM Tariff for non-fuel  
10 charges or credits applicable to the Company's Ohio-based Madison  
11 Generating Station designated as an Indiana resource in MISO  
12 (including PJM Scheduling, System Control and Dispatch Service,  
13 Reactive Supply and Voltage Control, and Black Start Service).

14 **Q. HAS THE COMPANY ADDRESSED THE NOVEMBER 21, 2019 FERC**  
15 **ORDER ("OPINION NO. 569") IN DOCKET NOS. EL14-12 AND EL14-45**  
16 **IN THIS FILING?**

17 A. Yes. As reported in prior RTO testimony, Opinion No. 569 lowered the base  
18 ROE from 10.32% to 9.88% effective September 28, 2016, and ordered refunds  
19 plus interest for the fifteen (15) month period of November 12, 2013 to February  
20 11, 2015 ("First Refund Period") and for the period of September 28, 2016 to the  
21 date of the Order ("Second Refund Period"). On December 9, 2019, MISO  
22 requested an extension of time to process these refunds, which was granted on

1 December 19, 2019. On December 23, 2019, the MISO Transmission Owners,  
2 along with several other parties in the proceeding, submitted requests for  
3 rehearing of Opinion No. 569.

4 On May 21, 2020, FERC issued Opinion No. 569-A, which revised the  
5 ROE methodology in Opinion No. 569. Opinion No. 569-A found that the MISO  
6 Transmission Owners' base ROE should be set at 10.02% and ordered refunds  
7 with interest for the First Refund Period previously defined and the Second  
8 Refund Period through the date of Opinion No. 569-A (May 21, 2020).  
9 Prior to the issuance of Opinion No. 569-A, MISO had begun the refund process  
10 using the ROE from Opinion No. 569. As a result, on May 28, 2020, MISO  
11 announced they were pausing the current resettlement efforts under Opinion No.  
12 569 due to the complexity of the resettlements with the slightly higher ROE under  
13 Opinion 569-A. On August 5, 2020, MISO announced that a refund approach had  
14 been developed and that the majority of the resettlement dollars would change  
15 hands in 2021 and that refunds and adjustments for all applicable periods would  
16 be completed by May or June 2022. Refunds and adjustments are currently due  
17 for completion by December 23, 2020. On September 9, 2020, MISO submitted a  
18 request for extension to FERC to approve the timelines outlined above. On  
19 October 8, 2020, FERC granted the extension to allow refunds to be completed by  
20 September 23, 2021. On June 29, 2021, MISO submitted an additional request to  
21 extend the timeline for completion to June 30, 2022. On August 2, 2021, FERC  
22 granted a partial extension of the deadline to complete refunds by February 28,

1 2022. The Company will continue to provide all required ROE refunds to its  
2 retail customers in a timely manner through the RTO tracker pursuant to the  
3 timelines established by FERC and MISO.

4 MISO issued ROE refunds, related to the FERC Opinion No. 569  
5 processed during the reconciliation months of July 2020 through June 2021, have  
6 been included in this filing. The net credit included in this filing on Petitioner's  
7 Exhibit 1-D (AJB) is \$360,057.

8 **Q. PLEASE BRIEFLY DESCRIBE HOW THE FORECASTED MISO COSTS**  
9 **AND TRANSMISSION REVENUES WERE DETERMINED.**

10 A. For purposes of forecasting the Schedule 26 and 26-A charges, the Company  
11 started with projected data available from MISO to reflect the charges by other  
12 market participants that will be applicable to Duke Energy Indiana. For the  
13 remaining charges, credits and revenues, the forecasted amounts were based on a  
14 twenty-four (24) month history of these items and then were adjusted for any  
15 known or anticipated changes. As the Company becomes more experienced with  
16 forecasting these costs, the methods utilized may evolve over time.

17 **Q. PLEASE BRIEFLY DESCRIBE THE RECONCILIATION STEP IN THE**  
18 **RIDER NO. 68 PROCESS.**

19 A. There is a reconciliation step included in the Rider No. 68 process to adjust for (a)  
20 any variances between the Company's projected RTO costs and transmission  
21 revenues versus actual RTO costs and transmission revenues incurred and (b)  
22 variances between the previous RTO tracker amounts by retail rate group

1 authorized for recovery versus the actual RTO revenues collected by retail rate  
2 group. The reconciliation in the current proceeding includes the months of July  
3 2020 through June 2021 and is shown in Columns C and D of Petitioner's Exhibit  
4 1-B (AJB).

5 **Q. PLEASE BRIEFLY DESCRIBE ANY SPECIAL PROVISIONS FOR**  
6 **COMMISSION APPROVAL OF COSTS COVERED BY RIDER NO. 68,**  
7 **WHICH ARE NOT BILLED BY MISO OR PJM PURSUANT TO THE**  
8 **SPECIFIC APPROVED SCHEDULES.**

9 A. To the extent that any costs to be recovered pursuant to Rider No. 68 are not  
10 billed by MISO or PJM to the Company (or a designee of the Company) pursuant  
11 to the specifically approved Schedules of the MISO or PJM Tariff, or any  
12 successor Tariff, the Company will demonstrate in its applicable annual filing the  
13 amount and reasonableness of such costs.

14 **Q. PLEASE BRIEFLY EXPLAIN HOW COSTS OR TRANSMISSION**  
15 **REVENUES THAT ARE NOT ACCOUNTED FOR SEPARATELY FOR**  
16 **THE COMPANY'S RETAIL ELECTRIC CUSTOMERS WILL BE**  
17 **HANDLED UNDER RIDER NO. 68.**

18 A. To the extent that the costs or transmission revenues identified in the formula set  
19 forth in the Rider No. 68 Tariff are not accounted for separately for the  
20 Company's retail electric customers, then the total Company amount of such  
21 costs or transmission revenues, whichever is applicable, will be multiplied by the  
22 Commission-approved retail allocator for the applicable period to determine the

1 retail electric jurisdictional portion of such costs or transmission revenues. In the  
2 Company's Current Base Rate Order (Cause No. 45253), the retail allocator for  
3 transmission is 100%, while the transmission allocator from the prior retail base  
4 rate case (Cause No. 42359, effective through July 2020) was 96.291%.

5 **Q. WHAT REVENUE CONVERSION FACTOR IS BEING USED FOR**  
6 **RIDER NO. 68 IN THIS PROCEEDING?**

7 A. The revenue conversion factor used for this proceeding is 1.00482. See  
8 Petitioner's Exhibit 1-I (AJB) for the underlying calculation of this factor.

9 **IV. PROPOSED RIDER NO. 68 ADJUSTMENT FACTORS**

10 **Q. PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-A (AJB).**

11 A. Petitioner's Exhibit 1-A (AJB) is the Company's revised Standard Contract  
12 Rider No. 68. Page 2 of this Exhibit shows the Percent Share of Retail Peak  
13 developed for cost of service purposes in Cause No. 45253.

14 **Q. HAVE YOU CALCULATED THE PROPOSED RIDER 68 ADJUSTMENT**  
15 **BILLING FACTORS FOR THE VARIOUS RETAIL RATE GROUPS**  
16 **USING THE COST COMPONENTS AND AMOUNTS YOU HAVE**  
17 **DESCRIBED?**

18 A. Yes, I have. Petitioner's Exhibit 1-B (AJB) includes projected RTO costs and  
19 transmission revenues (Column B) and a reconciliation of prior historical amounts  
20 (Columns C and D) broken down by retail rate group for those specific MISO and  
21 PJM cost components I have discussed in my testimony that were previously  
22 approved by the Commission for inclusion in Rider No. 68 rates via the current

RTO proceeding. The resulting revenue requirement totals for each retail rate group (except for HLF) (Column E) are divided by the corresponding kWh sales for the twelve (12)-months ended June 30, 2021. For developing the HLF rate, the revenue requirement amount is divided by KW demands for the twelve (12)-months ended June 30, 2021 to determine the proposed Rider No. 68 rate. These factors by respective retail rate groups are then used on Page 3 of 3 of Petitioner's Exhibit 1-A (AJB). The total amount that the Company proposes to be charged to the Company's retail electric customers through Rider No. 68, taking into account the reconciliation amount, is \$4,922,351.

The prefiled Testimony of Mr. James (Brad) Daniel, Petitioner's Exhibit 2, supports the reasonableness of the Company's Energy Markets and ASM non-fuel related costs.

**Q. WERE THERE ANY EMERGENCY EVENTS IN THE MISO FOOTPRINT DURING THE JULY 2020 THROUGH JUNE 2021 RECONCILIATION PERIOD?**

A. Yes. On August 27, 2020, MISO declared a Maximum Generation Emergency Event in response to Hurricane Laura causing system instability and threatening the reliability of the grid, directing the shedding of firm load in the affected area of western Louisiana and eastern Texas. In addition, in February 2021, the MISO region experienced unusually cold weather resulting in higher demand coupled with supply issues due to generation performance and fuel availability.

1   **Q.     WHAT WERE THE IMPACTS FROM THE EXTREME WEATHER**  
2   **EVENTS DURING THE RECONCILIATION PERIOD?**

3   A.     During the Hurricane Laura Maximum Generation Emergency Event, MISO  
4           implemented an Energy Emergency Alert 3 event, which triggered the Value of  
5           Lost Load ("VOLL") to be set at \$3,500/MWh and applied to the congestion  
6           component of the Locational Marginal Price ("LMP"). This created \$86 million  
7           in Real Time Congestion charges that were uplifted to the market through the  
8           Revenue Neutrality charge type. These charges were then distributed to Asset  
9           Owners through the Revenue Neutrality Uplift ("RNU") based on Load Ratio  
10          Share. Duke Energy Indiana's share was approximately \$3.9 million and is  
11          included in Petitioner's Exhibit 1-D (AJB).

12                 Duke Energy Indiana has been working with twenty plus market  
13                 participants located in the Central and North Regions of MISO. Together, this  
14                 coalition believes that MISO applied its Tariff inappropriately, resulting in  
15                 settlements that do not align with cost causation and allocation principles and  
16                 ignore the tariff provisions that cover catastrophic events. Duke Energy Indiana  
17                 filed an Alternative Dispute Resolution ("ADR") on March 26, 2021. The  
18                 Company continues to monitor the issue but does not expect resolution until the  
19                 fourth quarter of 2021. If Duke Energy Indiana receives a refund from MISO as a  
20                 result of the ADR process, the Company will provide a refund through the RTO  
21                 adjustment rider.



1    **Q.     WAS THERE ANY SINGLE ADJUSTMENT IN EXCESS OF \$3 MILLION**  
2       **INCLUDED IN THIS PROCEEDING?<sup>1</sup>**

3    A.    No.

4    **Q.     PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-C (AJB).**

5    A.    Petitioner's Exhibit 1-C (AJB) compares the forecasted non-fuel RTO costs and  
6       transmission revenues for the forecasted periods of January 2022 through  
7       December 2022 to the Company's annual charges built into base retail electric  
8       rates in Cause No. 45253. The total to be recovered from (or credited to)  
9       customers is shown on Petitioner's Exhibit 1-B (AJB), Column (B).

10   **Q.     PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-D (AJB).**

11   A.    Petitioner's Exhibit 1-D (AJB) compares the previously projected RTO non-fuel  
12       costs and transmission revenues (developed in RTO 55 and 56) to actual non-fuel  
13       costs and transmission revenues incurred during the reconciliation period of July  
14       2020 through June 2021. The total to be recovered from (or credited to)  
15       customers from this portion of the reconciliation is shown on Petitioner's Exhibit  
16       1-B (AJB), Column (C).

17   **Q.     PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-E (AJB).**

18   A.    Petitioner's Exhibit 1-E (AJB) compares the actual amount of Rider No. 68  
19       amounts charged (or credited) to customers at the retail rate group level to the

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<sup>1</sup> In Cause No. 42736 RTO-13, the Company defined the term "single adjustment" as an adjustment that is unique and/or non-recurring and outside the routine settlement and Post Analysis Cost Evaluator ("PACE") process described in testimony in the Company's FAC proceedings (Petitioner's Exhibit A, p. 23). Since 2015, the PACE process is administered by the Sumatra model.

1 amounts approved by the Commission for recovery during the reconciliation  
2 periods of July 2020 through June 2021. The total to be recovered from (or  
3 credited to) customers for this item is shown on Petitioner's Exhibit 1-B (AJB),  
4 Column (D).

5 **Q. PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-F (AJB).**

6 A. Petitioner's Exhibit 1-F (AJB) compares the bill of a typical residential customer  
7 using 1000 kilowatt-hours per month based upon the proposed Rider No. 68  
8 adjustment factor to the bill of a typical residential customer using 1000 kilowatt-  
9 hours per month based upon the most recently approved rate. Under the proposed  
10 Rider No. 68 adjustment, a typical residential customer will experience an  
11 increase of \$0.41<sup>2</sup> on his or her electric bill when compared to the bills reflecting  
12 the current Rider No. 68 rate. This is a 0.31%<sup>3</sup> increase to each residential  
13 customer's electric bill.

14 **Q. PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-G (AJB).**

15 A. Petitioner's Exhibit 1-G (AJB) provides information relating to Company-owned,  
16 MISO-approved RECB projects and provides an estimate of Schedule 26 costs to  
17 be allocated to the Company based on information provided by MISO.

18 **Q. PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-H (AJB).**

19 A. Petitioner's Exhibit 1-H (AJB) provides information relating to Company-owned,

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<sup>2</sup> The change is defined as the proposed change in factor from this proceeding compared to what the customer is paying today for this rider.

<sup>3</sup> The change is defined as the proposed factor from this proceeding compared to what the customer is paying today for this rider as a percentage of the total monthly bill of a 1000 kWh customer as of August 1, 2021 of \$132.48, excluding utility receipts and sales tax.

1 MISO-approved MVP projects and provides an estimate of Schedule 26-A costs  
2 to be allocated to the Company based on information provided by MISO.

3 **Q. PLEASE EXPLAIN PETITIONER'S EXHIBIT 1-I (AJB).**

4 A. Petitioner's Exhibit 1-I (AJB) shows the calculation of the revenue conversion  
5 factor being used in this proceeding. Note that the Commission's Order in Cause  
6 No. 45253 approved the Company's proposal to remove Utility Receipts Tax  
7 recovery from base and rider rates and show it as a separate line on the  
8 Company's bills. As a result, the revenue conversion factor will no longer  
9 include a gross-up intended to cover URT recovery.

10 **Q. PLEASE EXPLAIN PETITIONER'S EXHIBITS 1-J (AJB) AND 1-K (AJB).**

11 A. The standard format for Duke Energy Indiana filings (labeled as Petitioner's  
12 Exhibit 1-J (AJB) in this proceeding) and the Standard Audit Path (labeled as  
13 Petitioner's Exhibit 1-K (AJB) in this proceeding) were updated to reflect my  
14 Testimony and Workpapers.

15 **V. CONCLUSION**

16 **Q. WHAT REVISIONS TO THE COMPANY'S RETAIL ELECTRIC TARIFF**  
17 **ARE BEING PROPOSED TO REFLECT THE RIDER NO. 68**  
18 **TREATMENT PROPOSED IN THIS PROCEEDING?**

19 A. The Company is proposing to revise its Standard Contract Rider No. 68, First  
20 Revised Sheet No. 68, Page 1 through Page 3, as reflected in Petitioner's Exhibit  
21 1-A (AJB), Pages 1 through 3. The Company requests that the Commission find  
22 that the Rider No. 68 adjustment factors for the Company's bills rendered

1 beginning with the January 2022 – Cycle 1 billing cycle, or the date of the  
2 Commission's Order if later, for the Company's retail electric customers should  
3 be as set forth on page 3 of Petitioner's Exhibit 1-A (AJB).

4 **Q. WERE PETITIONER'S EXHIBITS 1-A (AJB) THROUGH 1-K (AJB)**  
5 **PREPARED BY YOU OR UNDER YOUR SUPERVISION?**

6 A. Yes, they were.

7 **Q. DOES THIS CONCLUDE YOUR PREPARED DIRECT TESTIMONY IN**  
8 **THIS PROCEEDING?**

9 A. Yes, it does.

DUKE ENERGY INDIANA, LLC  
1000 E. Main Street  
Plainfield, IN 46168

**STANDARD CONTRACT RIDER NO. 68 -  
REGIONAL TRANSMISSION OPERATOR ("RTO") NON-FUEL COSTS AND REVENUE  
ADJUSTMENT**

The applicable charges for electric service to the Company's retail electric customers shall be increased or decreased for operation and maintenance expense treatment of RTO Non-Fuel Costs and Revenues. The revenue adjustment to the applicable charges for electric service will be determined under the following provision:

**Calculation of Adjustment**

- A. The RTO Non-Fuel Costs and Revenue Adjustment by Rate Group shall be determined by multiplying the RTO Non-Fuel Costs and Revenue Adjustment Factor, as determined to the nearest 0.001 mill (\$0.000001) per kilowatt-hour in accordance with the following formula, by the monthly billed kilowatt-hours for the applicable billing cycle months in the case of customers receiving metered service and by the estimated monthly kilowatt-hours used for rate determination in the case of customers receiving unmetered service. RTO Non-Fuel Costs and Revenue Adjustment Factor Per Rate Group =

$$\frac{(NFC - (a - b) c) d}{s}$$

where:

1. "NFC" is the net Non-Fuel Costs and Credits forecasted to be billed Duke Energy Indiana, LLC, or a designee of Duke for mandated participation in regional transmission organizations under the Open Access Transmission and Energy Markets Tariff for the MISO ("MISO TEMT") or any successor Tariff, including applicable PJM non-fuel charges and credits related to the operation of Duke Energy Indiana's Madison Generating Station.
2. "a" is the annual level of forecasted RTO Non-Fuel Costs included in the determination of basic charges for service in Cause No. 45253 (\$59,998,000).
3. "b" is the annual level of forecasted RTO transmission revenues included in the determination of basic charges for service in Cause No. 45253 (\$23,540,000).
4. "c" is the individual retail rate group's allocated share of the Company's retail peak demand developed for cost of service purposes in Cause No. 45253 expressed as a percentage of the Company's total retail peak demand.
5. "d" is the revenue conversion factor used to convert the applicable charges to operating revenues.
6. "s" is the individual retail rate group's reported kilowatt-hour sales for the twelve-month period from July through June as a proxy for the relevant billing cycle months for all retail rate groups other than retail customers served under Rate HLF. The revenue adjustment for retail customers served under Rate HLF shall be based on demands within the Rate HLF customer group such that "s" shall be the sum of kilowatts billed for the applicable twelve-month period.
7. The RTO Non-Fuel Costs and Revenue Adjustment Factor per Rate Group shall be further modified to reflect the difference between the incremental base monthly fees actually charged or credited to the retail electric customers and the incremental base monthly fees to be charged or credited to the retail electric customers during billing cycle months, as determined above.

**Issued:** Pending

**Effective:**

Duke Energy Indiana, LLC  
 1000 East Main Street  
 Plainfield, Indiana 46168

IURC No. 15  
 Second Revised Sheet No. 68  
 Cancels and Supersedes  
 First Revised Sheet No. 68  
 Page 2 of 3

STANDARD CONTRACT RIDER NO. 68 -  
 REGIONAL TRANSMISSION OPERATOR ("RTO") NON-FUEL COSTS AND REVENUE ADJUSTMENT  
 APPLICABLE TO RETAIL RATE GROUPS

ALLOCATED SHARE OF SYSTEM PEAK DEMAND FOR RETAIL CUSTOMERS  
 BY RATE GROUP EXPRESSED AS A PERCENTAGE OF THE COMPANY'S  
 TOTAL RETAIL SYSTEM PEAK DEMAND AS DEVELOPED FOR COST OF  
SERVICE PURPOSES IN CAUSE NO. 45253

<u>Line No.</u>	<u>Rate Groups</u>	<u>KW Share of System Peak (4CP) Per Cause No. 45253 (A)</u>	<u>Percent Share Of System Peak (B)</u>	<u>Line No.</u>
1	Rate RS	2,102,591	42.114%	1
2	Rates CS and FOC	258,053	5.169%	2
3	Rate LLF	1,034,546	20.722%	3
4	Rate HLF	1,536,449	30.774%	4
5	Customer L	14,800	0.296%	5
6	Customer O	18,584	0.372%	6
7	Rate WP	20,717	0.415%	7
8	Rate SL	79	0.002%	8
9	Rate MHLS	15	0.000%	9
10	Rates MOLS and UOLS	5,633	0.113%	10
11	Rates TS, FS and MS	1,141	0.023%	11
12	TOTAL RETAIL	4,992,608	100.000%	12

Issued: Pending

Effective:

Duke Energy Indiana, LLC  
 1000 East Main Street  
 Plainfield, Indiana 46168

IURC No. 15  
 Second Revised Sheet No. 68  
 Cancels and Supersedes  
 First Revised Sheet No. 68  
 Page 3 of 3

STANDARD CONTRACT RIDER NO. 68 -  
 REGIONAL TRANSMISSION OPERATOR ("RTO") NON-FUEL COSTS AND REVENUE ADJUSTMENT  
APPLICABLE TO RETAIL RATE GROUPS

<u>Line</u> <u>No.</u>	<u>Retail Rate Group</u>	RTO Non-Fuel Cost and Revenue Adjustment <u>Factor Per KWH</u> (A)	RTO Non-Fuel Cost and Revenue Adjustment Factor Per <u>Non-Coincident KW</u> (B)	<u>Line</u> <u>No.</u>
1	Rate RS	\$0.000172		1
2	Rates CS and FOC	0.000247		2
3	Rate LLF	0.000215		3
4	Rate HLF		\$0.106090	4
5	Customer L	0.001523		5
6	Customer O	0.000028		6
7	Rate WP	0.000109		7
8	Rate SL	(0.000150)		8
9	Rate MHLS	(0.000096)		9
10	Rates MOLS and UOLS	0.000042		10
11	Rates TS, FS and MS	(0.000164)		11

Issued: Pending

Effective:

**DUKE ENERGY INDIANA, LLC**

**DETERMINATION OF THE REGIONAL TRANSMISSION OPERATOR ("RTO") NON-FUEL COST AND REVENUE ADJUSTMENT FACTORS BY RATE GROUP  
TO BE APPLIED TO CUSTOMER BILLS OVER A TWELVE MONTH PERIOD**

Line No.	Retail Rate Group Description	Allocated Percentage Share of Retail Peak Demands for the Company's Retail Electric Customers Approved in IURC Cause No. 45253 (A)	Projected RTO Non-Fuel Costs and Revenues By Rate Group for Calendar Year 2022 to be Collected through Standard Contract Rider No. 68 - 1/ (B)	Reconciliation of Amounts Projected for RTO Non-Fuel Costs and Revenues vs. Actual Amounts Incurred through the July 2020 through June 2021 Period (C)	Reconciliation of RTO Non-Fuel Costs and Revenues Approved for Recovery vs. Actual RTO Revenues Collected for the July 2020 through June 2021 Period (D)	Total (E) = (B) + (C) + (D)	Actual Kilowatt-Hour Sales For The Twelve Months Ended June 30, 2021 (F)	RTO Non-Fuel Costs and Revenue Adjustment Factors Per Kilowatt-Hour By Rate Group (G)	Actual Sum of Monthly Non-Coincident Peak Demands for the Twelve Months Ended June 30, 2021 (H)	RTO Non-Fuel Costs and Revenue Adjustment Factors Per Non-Coincident Peak Demands (I)	Line No.
1	Rate RS	42.114%	\$ 3,233,017	\$ 2,464,713	\$ (4,111,888)	\$ 1,585,842	9,218,228,683	\$0.000172			1
2	Rates CS	5.169%	396,815	302,515	(449,845)	249,486	1,011,836,654	0.000247			2
3	Rate LLF	20.722%	1,590,792	1,212,750	(1,715,275)	1,088,268	5,053,737,270	0.000215			3
4	Rate HLF	30.774%	2,362,466	1,801,041	(2,247,588)	1,915,919	9,701,028,474		18,059,291	\$0.106090	4
5	Customer L	0.296%	22,723	17,323	24,786	64,832	42,579,677	0.001523			5
6	Customer O	0.372%	28,558	21,771	(45,953)	4,376	156,236,642	0.000028			6
7	Rate WP	0.415%	31,859	24,288	(39,150)	16,998	155,234,106	0.000109			7
8	Rate SL	0.002%	154	117	(5,810)	(5,599)	38,806,363	(0.000150)			8
9	Rate MHLS	0.000%	-	-	(515)	(515)	5,354,633	(0.000096)			9
10	Rates MOLS and UOLS	0.113%	6,675	6,613	(11,019)	4,270	101,472,808	0.000042			10
11	Rates TS, FS and MS	0.023%	1,706	1,346	(4,697)	(1,585)	9,667,284	(0.000164)			11
12	<b>TOTAL RETAIL</b>	100.000%	\$ 7,676,825	\$ 5,852,477	\$ (8,606,951)	\$ 4,922,351	25,492,183,594				12

\_1/ The retail allocation percentages in Column (A) were used to calculate the amounts Per Retail Rate Group for the projection of non-fuel costs and transmission revenues shown on Line 12 in Column (B) and Column (C).



Line No.	Description	January 2022 (A)	February 2022 (B)	March 2022 (C)	April 2022 (D)	May 2022 (E)	June 2022 (F)	July 2022 (G)	August 2022 (H)	September 2022 (I)	October 2022 (J)	November 2022 (K)	December 2022 (L)	Total (M) SUM (A) - (L)	Line No.
<b>Forecasted RTO Non-Fuel Costs &amp; Transmission Revenues</b>															
<i>Non-Fuel Costs</i>															
1	Schedule 10 FERC	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000	2,400,000	1
2	Schedule 10	475,000	475,000	475,000	475,000	475,000	475,000	475,000	475,000	475,000	475,000	475,000	475,000	5,700,000	2
3	Schedule 16	16,667	16,667	16,666	16,667	16,667	16,666	16,667	16,667	16,666	16,667	16,667	16,666	200,000	3
4	Schedule 17	416,667	416,667	416,666	416,667	416,667	416,666	416,667	416,667	416,666	416,667	416,667	416,666	5,000,000	4
5	Real Time Miscellaneous	-	-	-	-	-	-	-	-	-	-	-	-	-	5
6	Real Time Revenue Neutrality Uplift Amount	383,333	383,333	383,334	383,333	383,333	383,334	383,333	383,333	383,334	383,333	383,333	383,334	4,600,000	6
7	Real Time MVP Distribution Amount	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(150,000)	7
8	Schedule 26 - Network Upgrade Charge from Transmission Expansion Plan	625,000	625,000	625,000	625,000	625,000	625,000	625,000	625,000	625,000	625,000	625,000	625,000	7,500,000	8
9	Schedule 26 A - Multi-Value Projects	3,766,667	3,766,667	3,766,666	3,766,667	3,766,667	3,766,666	3,766,667	3,766,667	3,766,666	3,766,667	3,766,667	3,766,666	45,200,000	9
10	Schedule 26 C	1,333	1,333	1,334	1,333	1,333	1,334	1,333	1,333	1,334	1,333	1,333	1,334	16,000	10
11	Schedule 26 D	667	667	666	667	667	666	667	667	666	667	667	666	8,000	11
12	Schedule 49	10,333	10,333	10,334	10,333	10,333	10,334	10,333	10,333	10,334	10,333	10,333	10,334	124,000	12
13	PJM Madison Non-Fuel	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	1,500,000	13
14	Total RTO Non-Fuel Costs	6,008,167	6,008,167	6,008,166	6,008,167	6,008,167	6,008,166	6,008,167	6,008,167	6,008,166	6,008,167	6,008,167	6,008,166	72,098,000	14
15	Transmission Revenues	(2,333,333)	(2,333,333)	(2,333,334)	(2,333,333)	(2,333,333)	(2,333,334)	(2,333,333)	(2,333,333)	(2,333,334)	(2,333,333)	(2,333,333)	(2,333,334)	(28,000,000)	15
16	Total Non-Fuel Costs & Transmission Revenues	3,674,834	3,674,834	3,674,832	3,674,834	3,674,834	3,674,832	3,674,834	3,674,834	3,674,832	3,674,834	3,674,834	3,674,832	44,098,000	16
<b>Amounts Included in Base Rates</b>															
<i>Non-Fuel Costs</i>															
17	Schedule 10 FERC	211,583	211,583	211,584	211,583	211,583	211,584	211,583	211,583	211,584	211,583	211,583	211,584	2,539,000	17
18	Schedule 10	482,417	482,417	482,416	482,417	482,417	482,416	482,417	482,417	482,416	482,417	482,417	482,416	5,789,000	18
19	Schedule 16	26,917	26,917	26,917	26,917	26,917	26,917	26,917	26,917	26,917	26,917	26,917	26,917	323,004	19
20	Schedule 17	528,333	528,333	528,333	528,333	528,333	528,333	528,333	528,333	528,333	528,333	528,333	528,333	6,339,996	20
21	Real Time Miscellaneous	-	-	-	-	-	-	-	-	-	-	-	-	-	21
22	Real Time Revenue Neutrality Uplift Amount	-													

Line No.	Description	RTD S6						RTD S8						Total	Line No.		
		July 2020	August 2020	September 2020	October 2020	November 2020	December 2020	January 2021	February 2021	March 2021	April 2021	May 2021	June 2021				
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)				
		Sum (A) to (F)						Sum (A) to (F)									
<b>Actual RTD Non-Fuel Costs &amp; Transmission Revenues</b>																	
Non-Fuel Costs																	
1	Schedule 10 FEREC	179,587	202,040	236,005	215,477	180,314	177,175	1,170,508	10,728	198,769	186,954	182,249	162,592	214,114	1,333,396	2,303,994	1
2	Schedule 10	253,880	425,111	521,128	335,618	397,100	511,515	2,444,456	877,342	507,888	430,138	517,655	892,786	520,791	3,226,654	5,671,240	2
3	Schedule 16	22,221	21,180	17,237	12,513	8,707	20,313	101,871	13,306	8,542	11,881	8,979	7,053	11,844	61,397	183,088	3
4	Schedule 120	423,387	424,296	444,748	444,748	335,022	378,815	2,577,998	443,402	371,104	338,943	409,655	437,650	421,947	2,890,845	4,890,845	4
5	Real Time Miscellaneous	322,552	1,600	375	(3,920)	4,678	1,332	326,715	1,686	2,483	730	9,431	(7,212)	5,720	17,338	34,053	5
6	Real Time Revenue Neutrality Uplift Amount	269,444	42,105	4,337,008	583,257	619,595	740,458	601,696	408,172	(1,715,948)	1,444,689	369,800	61,302	763,610	1,892,187	6,564,093	6
7	Real Time MIP Distribution Amount	(2,406)	(12,292)	(2,509)	(5,038)	(2,767)	(2,740)	(15,749)	(23,500)	(23,822)	(23,599)	(18,312)	(18,155)	(16,251)	(125,539)	(141,388)	7
8	Schedule 26 - Network Upgrade Charge from Transmission Expansion Plan	526,934	608,648	681,970	655,632	480,495	532,240	3,482,918	571,539	709,162	600,898	581,499	492,027	689,025	3,656,500	7,138,419	8
9	Schedule 26 A - Multi-Value Projects	3,081,287	1,816,432	3,694,018	3,948,792	3,489,211	3,808,830	20,098,328	3,873,551	4,300,424	3,892,542	3,663,518	3,089,659	3,328,881	22,160,256	43,196,583	9
10	Schedule 26 C	-	1,012	1,059	1,059	1,058	1,058	5,218	1,048	1,048	1,048	1,048	1,048	1,048	5,218	10,486	10
11	Schedule 26 D	-	665	690	692	690	677	3,414	683	821	795	830	830	830	4,824	8,238	11
12	Schedule 49	-	-	-	-	8,705	10,150	19,855	10,525	10,297	10,402	10,707	10,762	10,834	63,497	83,552	12
13	Total RTD Non-Fuel Costs	5,046,719	4,906,980	10,107,363	6,270,807	5,690,673	6,340,999	38,263,460	6,235,556	4,843,536	6,896,880	5,797,054	5,656,988	6,100,022	35,171,048	73,549,508	14
15	Transmission Revenues	(381,044)	(2,247,074)	(1,972,133)	(2,032,448)	(2,360,245)	(2,819,027)	(11,812,959)	(2,522,088)	(3,506,690)	(2,583,578)	(2,357,868)	(2,898,438)	(3,220,391)	(18,908,141)	(28,419,109)	15
16	Total Non-Fuel Costs & Transmission Revenues	4,665,675	2,659,906	8,135,231	4,237,361	3,330,428	3,521,972	26,570,492	3,713,511	927,846	4,313,302	3,439,068	2,868,656	2,879,630	16,264,907	45,016,398	16
17	Less: Amount in Base Rates	(385,916)	(3,028,166)	3,038,166	3,038,166												

## DUKE ENERGY INDIANA, LLC

### RECONCILIATION OF THE REGIONAL TRANSMISSION OPERATOR ("RTO") NON-FUEL COSTS AND REVENUES TO BE RECOVERED OR CREDITED THROUGH RIDER NO. 68 VERSUS WHAT WAS ACTUALLY COLLECTED FROM CUSTOMERS

Line No.	Description	RTO 55 _1/						RTO 56 _2/						Sub-Total	Total	Line No.	
		July 2020	August 2020_3/	September 2020	October 2020	November 2020	December 2020	January 2021	February 2021	March 2021	April 2021	May 2021	June 2021				
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	
							Sum (A) to (F)								Sum (H) to (M)	(G)+(N)	
<b><u>Rider Revenues Approved for Recovery</u></b>																	
1	Rate RS	-	2,053,437	1,185,322	1,185,323	1,185,323	1,185,322	6,794,727	1,185,323	1,185,322	(179,681)	(179,681)	(179,681)	(179,680)	1,651,922	8,446,649	1
2	Rate CS	-	282,875	145,484	145,485	145,485	145,484	864,813	145,485	145,484	(11,044)	(11,045)	(11,044)	(11,045)	246,791	1,111,604	2
3	Rate LLF	-	1,014,275	583,232	583,233	583,233	583,232	3,347,205	583,233	583,232	(170,713)	(170,713)	(170,713)	(170,713)	483,613	3,830,818	3
4	Rate HLF	-	2,024,966	866,152	866,152	866,152	866,151	5,489,573	866,152	866,151	3,405	3,405	3,406	3,405	1,745,924	7,235,497	4
5	Customer L	-	14,069	8,331	8,331	8,331	8,332	47,394	8,331	8,332	(897)	(896)	(896)	(897)	13,077	60,471	5
6	Customer O	-	23,324	10,470	10,470	10,470	10,471	65,205	10,470	10,471	(4,657)	(4,658)	(4,658)	(4,657)	2,311	67,516	6
7	Rate WP	-	22,117	11,681	11,680	11,681	11,681	68,840	11,681	11,681	(4,376)	(4,376)	(4,376)	(4,375)	5,859	74,699	7
8	Rate SL	-	2,115	57	56	56	56	2,340	56	56	(360)	(359)	(359)	(360)	(1,326)	1,014	8
9	Rate MHLS	-	289	-	-	-	-	289	-	-	(105)	(105)	(105)	(105)	(420)	(132)	9
10	Rate MOLLS and UOLS	-	6,537	3,181	3,180	3,181	3,181	19,260	3,181	3,181	(663)	(664)	(664)	(663)	3,708	22,968	10
11	Rates TS, FS and MS	-	2,119	648	647	647	648	4,709	647	648	(501)	(500)	(500)	(501)	(707)	4,002	11
12	Total	-	5,446,119	2,814,558	2,814,557	2,814,559	2,814,558	16,704,351	2,814,559	2,814,558	(369,592)	(369,592)	(369,590)	(369,591)	4,150,752	20,855,103	12
<b><u>Rider Revenues Actually Collected</u></b>																	
13	Rate RS	3,438,849	2,257,484	1,228,330	863,316	929,333	1,288,500	10,005,812	1,609,371	1,485,659	(105,091)	(142,399)	(129,334)	(165,481)	2,552,725	12,558,537	13
14	Rate CS	460,599	301,014	150,535	118,861	117,291	138,224	1,286,524	160,052	146,807	(3,498)	(8,863)	(8,572)	(10,802)	274,924	1,561,448	14
15	Rate LLF	1,544,749	1,084,852	642,630	574,209	561,830	597,181	5,005,451	614,624	553,489	(125,176)	(162,104)	(159,347)	(180,845)	540,641	5,546,092	15
16	Rate HLF	3,055,316	1,762,448	887,863	794,282	773,121	742,760	8,015,790	719,798	693,731	53,341	(6,951)	4,069	3,307	1,467,295	9,483,085	16
17	Customer L	11,969	7,078	3,018	2,911	3,063	2,958	30,997	3,042	3,044	(325)	(362)	(350)	(361)	4,688	35,685	17
18	Customer O	31,857	36,196	10,721	10,363	10,778	10,416	110,331	10,751	10,753	(4,284)	(4,745)	(4,592)	(4,745)	3,138	113,469	18
19	Rate WP	35,504	22,453	12,390	11,790	11,390	12,296	105,823	13,298	11,906	(3,869)	(4,336)	(4,282)	(4,692)	8,025	113,848	19
20	Rate SL	3,971	3,956	50	52	50	52	8,131	51	51	(352)	(351)	(357)	(350)	(1,308)	6,823	20
21	Rate MHLS	465	288	-	-	-	-	753	-	-	(103)	(98)	(86)	(83)	(370)	383	21
22	Rate MOLLS and UOLS	9,272	9,251	2,986	2,920	2,964	2,991	30,384	2,983	2,843	(488)	(585)	(578)	(573)	3,602	33,986	22
23	Rates TS, FS and MS	3,517	3,087	657	653	657	695	9,266	709	647	(469)	(490)	(483)	(482)	(568)	8,698	23
24	Total	8,596,068	5,488,107	2,939,180	2,379,357	2,410,477	2,796,073	24,609,262	3,134,679	2,908,730	(190,314)	(331,284)	(303,912)	(365,107)	4,852,792	29,462,054	24
<b><u>Under (Over) Collected</u></b>																	
25	Rate RS	(3,438,849)	(204,047)	(43,008)	322,007	255,990	(103,178)	(3,211,085)	(424,048)	(300,337)	(74,590)	(37,282)	(50,347)	(14,199)	(900,803)	(4,111,888)	25
26	Rate CS	(460,599)	(18,140)	(5,051)	26,624	28,194	7,260	(421,712)	(14,567)	(1,123)	(7,546)	(2,182)	(2,472)	(243)	(28,133)	(449,845)	26
27	Rate LLF	(1,544,749)	(70,578)	(59,398)	9,024	21,403	(13,949)	(1,658,247)	(31,391)	29,743	(45,537)	(8,609)	(11,366)	10,132	(57,028)	(1,715,275)	27
28	Rate HLF	(3,055,316)	262,518	(21,711)	71,870	93,031	123,391	(2,526,217)	146,354	172,420	(49,936)	10,356	(663)	98	278,629	(2,247,588)	28
29	Customer L	(11,969)	6,991	5,313	5,420	5,268	5,374	16,397	5,289	5,288	(572)	(534)	(546)	(536)	8,389	24,786	29
30	Customer O	(31,857)	(12,872)	(251)	107	(308)	55	(45,126)	(281)	(282)	(373)	87	(66)	88	(827)	(45,953)	30
31	Rate WP	(35,504)	(337)	(709)	(110)	291	(615)	(36,984)	(1,617)	(225)	(507)	(40)	(94)	317	(2,166)	(39,150)	31
32	Rate SL	(3,971)	(1,842)	7	4	6	4	(5,792)	5	5	(8)	(8)	(2)	(10)	(18)	(5,810)	32
33	Rate MHLS	(465)	1	-	-	-	-	(465)	-	-	(2)	(7)	(19)	(22)	(50)	(515)	33
34	Rate MOLLS and UOLS	(9,272)	(2,715)	195	260	217	190	(11,125)	198	338	(175)	(79)	(86)	(90)	106	(11,019)	34
35	Rates TS, FS and MS	(3,517)	(969)	(9)	(6)	(10)	(47)	(4,558)	(62)	1	(32)	(10)	(17)	(19)	(139)	(4,697)	35
36	Total	(8,596,068)	(41,988)	(124,822)	435,200	404,082	18,485	(7,904,911)	(320,120)	(94,172)	(179,278)	(38,308)	(65,678)	(4,484)	(702,040)	(8,606,951)	36

\_1/ During the pendency of the Company's most recent retail base rate case filing in Cause No. 45253, the Company suspended its RTO filings therefore the RTO55 rates have remained in effect until approval of new RTO rates in the Company's Compliance filing which was approved for billing effective July 30, 2020. Compliance filing rates remained in effect until approval of RTO 56 rates approved for billing March 2021 - Billing Cycle 1.

\_2/ The Company's rates in RTO 56 were approved on February 24, 2021 and began billing March 2021 - Billing Cycle 1.

\_3/ August 2020 approved rider revenues for recovery have been pro-rated to reflect the services-rendered implementation of rates as approved in the Company's Compliance Filing in Cause No. 45253 dated June 29, 2020 (50% RTO-55 and 50% RTO-55 Compliance Filing)

**DUKE ENERGY INDIANA, LLC**

**Comparison of the Effect of a Change in the Regional Transmission Operator ("RTO") Non-Fuel Cost and Revenue Adjustment (Rider No. 68) on the Bill of a Typical Residential Customer Using 1,000 kWh's**

Line No.	Description	RTO Non-Fuel Cost and Revenue Adjustment Factor Rider No. 68 (A)	Base Bill For Typical Residential Customer (1) (B)	All Other Riders Excluding Rider No. 68 (2) (C)	Total Bill for Typical Residential Customer Excluding Rider No. 68 (D)	RTO Non-Fuel Cost and Revenue Adjustment Amount for Rider No. 68 for 1,000 kWh's (E)	Total Bill Including RTO Non-Fuel Cost and Revenue Adjustment Amount Rider No. 68 (F)	Increase/ (Decrease) In Total Bill From Current Factor (3) (G)	% Increase/ (Decrease) In Total Bill From Current Factor (H)	Line No.
1	Proposed Factor	\$ 0.000172	\$ 130.99	\$ 1.73	\$ 132.72	\$ 0.17	\$ 132.89	\$ 0.41	0.31%	1
2	Current Approved Factor	\$ (0.000237)	\$ 130.99	\$ 1.73	\$ 132.72	\$ (0.24)	\$ 132.48	NA	NA	2

- (1) Reflects base rates approved in the Company's Compliance filing in Cause No. 45253, effective July 30, 2020.  
(2) Reflects Rider No. 68 rates in effect as of the date of this filing.  
(3) Line 1, column G equals line 1, column F less line 2, column F.

**DUKE ENERGY INDIANA, LLC**

**COMPANY-OWNED SCHEDULE 26 PROJECT STATUS AND ESTIMATE OF ALLOCATED SCHEDULE 26 COSTS  
CAUSE NO. 42736 - RTO 57**

Line No.	Project Type	Location	Description	MISO Approval Status	MTEP Project ID	Expected Construction Schedule			Estimated Total Project Costs			Actual Costs	Percentage of Completion	Line No.
						Start	Finish	In-Service	Original	Revised	Date Revised			
1	RECB 1 - Baseline Reliability Project	Lafayette SE to Concord	138 KV Reconductor with 954 ACSR (4.3 miles)	Approved - MTEP 07	852	2/5/08	4/24/09	4/30/09	\$ 2,000,000	-	-	\$ 1,257,394.14	100.00%	1
2	RECB 1 - Baseline Reliability Project	Concord to Crawfordsville	138 KV Reconductor with 954 ACSR (17.36 miles)	Approved - MTEP 07	852	5/15/08	5/15/13	6/1/13	\$ 8,200,000	8,920,355	Apr-13	\$ 7,174,167.73	100.00%	2
3	RECB 1 - Generator Interconnection Project	Knox County	IGCC 345 KV Switching Station <sup>1</sup>	Approved - MTEP 07	1263	4/14/08	4/20/10	6/1/10	\$ 9,198,424	11,857,496	Jan-10	\$ 11,983,364.56	100.00%	3
4	RECB 1 - Generator Interconnection Project	Knox County	IGCC 34528 Line Termination <sup>1</sup>	Approved - MTEP 07	1263	5/6/08	3/8/10	6/1/10	\$ 168,576	192,757	Dec-09	\$ 145,205.77	100.00%	4
5	RECB 1 - Baseline Reliability Project	Vigo County	Add a 3rd 345/138 kv transformer at Dresser Sub	Approved - MTEP 10	2050	12/22/09	12/31/2011	12/31/2011	\$ 12,700,000	\$13,443,888	Jun-11	\$ 13,833,026.42	100.00%	5

Based on the MISO-approved MTEP06 through MTEP 20 the Midcontinent ISO currently estimates that Duke Energy Indiana's share of allocated project costs through 2035 is an average of approximately \$11.1 million annually.

<sup>1</sup> In accordance with the Commission's Order dated November 20, 2007 in Cause Nos. 43114 and 43114-S1, page 59, Duke Energy Indiana will seek reimbursement of these costs under the Midcontinent ISO's RECB process.

DUKE ENERGY INDIANA, LLC

COMPANY-OWNED SCHEDULE 26-A PROJECT STATUS AND ESTIMATE OF ALLOCATED SCHEDULE 26-A COSTS  
CAUSE NO. 42736 - RTO 57

Line No.	Project Type	MTEP	Facility	Description	MISO	Expected Construction Schedule			Actual Costs	Percentage of Completion	Line No.
		Project ID	ID #		Approval Status	Start	Finish	In-Service			
1	MVP - Multi-Value Project	2237	8313	Sugar Creek 345kV Transmission Line	Approved - MTEP 11	12/2/16	12/14/20	12/14/20	\$ 7,910,823.95	100.00%	1
2	MVP - Multi-Value Project	2237	8313	Sugar Creek 345kV Transmission Line	Approved - MTEP 11	12/2/16	6/28/19	6/28/19	\$ 5,556,058.50	100.00%	2
3	MVP - Multi-Value Project	2237	8313	Sugar Creek 345kV Transmission Line	Approved - MTEP 11	12/2/16	11/30/18	10/1/18	\$ 360,234.25	100.00%	3
4	MVP - Multi-Value Project	2237	8313	Sugar Creek 345kV Transmission Line	Approved - MTEP 11	1/14/17	1/29/21	11/30/20	\$ 152,023.38	100.00%	4
5	MVP - Multi-Value Project	2202	7286	Wabash 6986 ckt Reconductor	Approved - MTEP 11	2/17/17	7/31/18	6/1/18	\$ 4,715.41	100.00%	5
6	MVP - Multi-Value Project	2202	7286	Wabash 6986 ckt Reconductor	Approved - MTEP 11	2/17/17	7/2/18	7/2/18	\$ 1,744,593.87	100.00%	6
7	MVP - Multi-Value Project	2202	7287	Kokomo Delco to Greentown 138 kV Uprate	Approved - MTEP 11	11/02/17	8/7/2018	6/8/2018	\$ 403,470.97	100.00%	7

Based on the MISO-approved MTEP06 through MTEP 20 the Midcontinent ISO currently estimates that Duke Energy Indiana's share of allocated project costs through 2041 is an average of approximately \$48.3 million annually.

**DUKE ENERGY INDIANA, LLC**

**COMPONENTS OF REVENUE CONVERSION FACTOR**

Components of Revenue Conversion Factor:

	<u>Statutory</u>	<u>Effective Rate</u>
Utility Receipts Tax	1.400%	1.400%
Uncollectible Accounts Expense	0.280%	0.280%
Public Utility Fee	0.128%	0.128%
Supplemental Corporate Net Income Tax	4.900%	0.072%
Federal Income Tax	21.000%	-
Subtotal Effective Rate		<u>1.880%</u>
Remove Utility Receipts Tax	1.400%	1.400%
Total Effective Rate		0.480%
Complement (1 - Effective Rate)		<u>99.520%</u>
Revenue Conversion Factor (1 ÷ Complement)		<u>1.00482</u>

**STANDARD FORMAT FOR DUKE ENERGY INDIANA FILINGS**  
**RIDER NO. 68 – IURC CAUSE NO. 42736-RTO**

**(1) VERIFIED PETITION**

Petitioner's Exhibit 1-A – Proposed Duke Energy Indiana Rider No. 68, showing proposed adjustment factors

**(2) DIRECT TESTIMONY OF ART J. BUESCHER III**

Petitioner's Exhibit 1-A (AJB): Proposed Duke Energy Indiana Rider No. 68, showing proposed adjustment factors.

Petitioner's Exhibit 1-B (AJB): Determination of the Regional Transmission Operator ("RTO") Non-Fuel Costs and Revenue Adjustment Factors by Rate Group to be Applied to Customer Bills Over a Twelve Month Period.

Petitioner's Exhibit 1-C (AJB): Determination of the Forecasted Regional Transmission Operator ("RTO") Non-Fuel Costs and Revenues to be Recovered or Credited Through Rider 68 for the Twelve Months Ended December 2022.

Petitioner's Exhibit 1-D (AJB): Reconciliation of Amounts Forecasted for Regional Transmission Operator ("RTO") Non-Fuel Costs and Revenues Versus Actual Amounts Incurred for the July 2020 Through June 2021 Period.

Petitioner's Exhibit 1-E (AJB): Reconciliation of the Regional Transmission Operator ("RTO") Non-Fuel Costs and Revenues to be Recovered or Credited Through Rider No. 68 Versus What Was Actually Collected From Customers.

Petitioner's Exhibit 1-F (AJB): Comparison of the Effect of a Change in the Regional Transmission Operator ("RTO") Non-Fuel Cost and Revenue Adjustment (Rider No. 68) on the Bill of a Typical Residential Customer Using 1,000 kWh's.

Petitioner's Exhibit 1-G (AJB): Company-Owned Schedule 26 Project Status and Estimate of Allocated Schedule 26 Costs.

Petitioner's Exhibit 1-H (AJB): Company-Owned Schedule 26-A Project Status and Estimate of Allocated Schedule 26-A Costs.

Petitioner's Exhibit 1-I (AJB): Components of Revenue Conversion Factor.

Petitioner's Exhibit 1-J (AJB): Standard Format for Duke Energy Indiana Filings - Rider No. 68 - IURC Cause No. 42736-RTO.

Petitioner's Exhibit 1-K (AJB): Standard Audit Path for Duke Energy Indiana - Rider No. 68 - IURC Cause No. 42736-RTO.

**(3) WORKPAPERS OF ART BUESCHER**

Workpaper 1 (AJB): Kilowatt-Hour Sales by Rate Schedule for the Twelve Months Ended June 30, 2021.

Workpaper 2 (AJB): Twelve Months Ended June 2021 HLF Billing KW (NCP).



**STANDARD FORMAT FOR DUKE ENERGY INDIANA FILINGS**  
**RIDER NO. 68 – IURC CAUSE NO. 42736-RTO**

- Workpaper 3 (AJB): Aggregation of Regional Transmission Operator Non-Fuel Cost and Revenue Adjustment Revenues Collected During the Twelve Month Period Ending June 2021.
- Workpaper 4 (AJB): MISO Invoice Detailing Schedule 10 Costs for Demand and Energy.
- Workpaper 5 (AJB): Allocation of MISO FERC Fees to Operating Companies and Business Units.
- Workpaper 6 (AJB): Allocation to Derive Duke Energy Indiana's Portion of MISO Schedule 10 Costs.
- Workpaper 7 (AJB): Data Query for Accounts 561400, 561800 and 575700 Showing the Wholesale and Retail Amounts of Schedule 10 Costs.
- Workpaper 8 (AJB): Restatement of Detail Provided by MISO for Transmission Revenues Collected Under the MISO TEMT, or Any Successor Tariff.
- Workpaper 9 (AJB): Summarized Schedule of the MISO Transmission Revenue Schedules.
- Workpaper 10 (AJB): Derivation of Duke Energy Indiana's Retail Portion of the MISO Transmission Revenues.
- Workpaper 11 (AJB): Derivation of Duke Energy Indiana's Retail Portion of PJM Charges and Credits Associated with Madison Generating Station.
- Workpaper 12 (AJB): Calculation of Duke Energy Indiana's Retail Portion of MISO Administrative Fees, Schedules 16 and 17 Cost, as well as, Real-Time Revenue Neutrality Uplift Amount, Real-Time Miscellaneous Amount and Real-Time MVP Distribution Amount.
- Workpaper 13 (AJB): MISO Invoice Detailing Schedule 26 and Schedule 26A (MVP) Charges.
- Workpaper 14 (AJB): Duke Energy Indiana MISO Attachment GG – Calculation of Revenue Requirement for Company-Owned Schedule 26 RECB Projects.
- Workpaper 15 (AJB): Duke Energy Indiana MISO Attachment MM – Calculation of Revenue Requirement for Company-Owned Schedule 26-A MVP Projects.

**(4) DIRECT TESTIMONY OF JAMES (BRAD) DANIEL**

Petitioner's Exhibit 2-A (JBD): Appendix A: Description of PJM Charges and Credits.

**STANDARD AUDIT PATH FOR DUKE ENERGY INDIANA  
RIDER NO. 68 – IURC CAUSE NO. 42736-RTO**

- Workpaper 1 (AJB):** Kilowatt Hour Sales by Rate Schedule for the Twelve Months Ended June 30 2021 Listed on Petitioner's Exhibit 1-B (AJB).
- Workpaper 2 (AJB):** KW Demands for HLF Rate Class Listed on Petitioner's Exhibit 1-B (AJB).
- Workpaper 3 (AJB):** Determination of Duke Energy Indiana Rider No. 68 Revenues Charged or Credited for the Reconciliation Months as Listed on Petitioner's Exhibit 1-E (AJB).
- Workpaper 4 (AJB):** Miso Invoice Detailing Schedule 10 Costs for Demand and Energy.  
A) Current Month Native Load Schedule 10 Costs for Demand and Energy, Plus Any Adjustments Carried to Workpaper 5 (AJB).
- Workpaper 5 (AJB):** Allocation of MISO FERC Fees to Operating Companies and Business Units.  
A) Monthly MISO FERC Fee Amounts listed on Petitioner's Exhibit 1-B (AJB), Page 1 of 2, Filed with Duke Energy Indiana's Testimony.
- Workpaper 6 (AJB):** Allocation to Derive Duke Energy Indiana's Portion of MISO Schedule 10 Costs.  
A) Native Load Schedule 10 Demand and Energy Costs and Rates from Workpaper 3 (AJB).  
B) Duke Energy Indiana Portion of Total Charges Less Wholesale Costs From Workpaper 7 (AJB) equals amount journalized in account 561000 and 575700 as Shown on Workpaper 7 (AJB).
- Workpaper 7 (AJB):** Data Query for Accounts 561400, 561800 and 575700 Showing the Wholesale and Retail Amounts of Schedule 10 Costs.  
A) General Ledger Detail for Accounts 561400, 561800 and 575700 Broken Up Into Estimated and Final Amounts for Retail and Wholesale Costs for the Relevant Time Period.
- Workpaper 8 (AJB):** Restatement of Detail Provided by MISO for Transmission Revenues Collected Under the MISO TEMT, or any Successor Tariff.  
A) Schedules of Estimated and Final MISO Transmission Revenue Amounts Collected Under the MISO TEMT, or Any Successor Tariff, Which are Carried Forward to Workpaper 9 (AJB). Allocation to Operating Company.
- Workpaper 9 (AJB):** Summarized Schedule of the MISO Transmission Revenue Schedules.  
A) Reconciled Monthly Revenues Added to Current Month's Revenue to Derive the Amount Journalized in Account 456850.
- Workpaper 10 (AJB):** Derivation of Duke Energy Indiana's Retail Portion of the MISO Transmission Revenues for the Reconciliation Period as Reported on Petitioner's Exhibit 1-E (AJB), filed with Duke Energy Indiana's Direct Testimony.  
A) Total Duke Energy Indiana MISO Transmission Revenues, Less WVPA's and IMPA's Revenue Portion, Multiplied by the Retail Allocation Percent to Create the Retail Portion of MISO Transmission Revenue. Retail Allocation Percentage for July 2020

**STANDARD AUDIT PATH FOR DUKE ENERGY INDIANA  
RIDER NO. 68 – IURC CAUSE NO. 42736-RTO**

(96.291%) from the IURC Order in Cause No. 42736 and for August 2020 through June 2021 (100.000%) from IURC Order in Cause No. 45253. (Amounts attributable to WVPA and IMPA need to be excluded because MISO includes such amounts in MISO's transmission revenues for the Cinergy Control Area/Zone.)

- Workpaper 11 (AJB):** Derivation of Duke Energy Indiana's Retail Portion of PJM Charges and Credits Associated with Madison Generating as Approved in Cause No. 45253.
- Workpaper 12 (AJB):** Calculation of Duke Energy Indiana's Retail Portion of MISO Administrative Fees, Schedules 16 and 17 Costs, as well as, Real-Time Revenue Neutrality Uplift Amount, Real-Time Miscellaneous Amount and Real-Time MVP Distribution Amount.
- A) Total Duke Energy Indiana MISO Administrative Fees and Other Standard Market Design Costs multiplied by the retail allocation percent to calculate the retail portion of MISO charges. Retail allocation percentage for July 2020 (96.291%) is from the IURC Order in Cause No. 42736 and for August 2020 through June 2021 (100.000%) from IURC Order in Cause No. 45253.
- Workpaper 13 (AJB):** MISO Invoice Detailing Schedule 26 and Schedule 26A (MVP) Charges.
- Workpaper 14 (AJB):** Duke Energy Indiana MISO Attachment GG – Calculation of Revenue Requirement for Company-Owned Schedule 26 RECB Projects.
- Workpaper 15 (AJB):** Duke Energy Indiana MISO Attachment MM – Calculation of Revenue Requirement for Company-Owned Schedule 26-A MVP Projects.

## 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: \_\_\_\_\_

Art J. Butscher III

Dated: \_\_\_\_\_

8-31-21