STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY FOR AUTHORITY TO MODIFY ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE AND FOR APPROVAL OF: (1) CHANGES TO ITS ELECTRIC SERVICE TARIFF INCLUDING A NEW SCHEDULE OF RATES AND CHARGES AND CHANGES TO THE GENERAL RULES AND REGULATIONS AND CERTAIN RIDERS; (2) REVISED DEPRECIATION ACCRUAL RATES; (3) INCLUSION IN ITS BASIC RATES AND CHARGES OF THE COSTS ASSOCIATED WITH CERTAIN PREVIOUSLY APPROVED QUALIFIED POLLUTION CONTROL PROPERTY, CLEAN COAL TECHNOLOGY, CLEAN ENERGY PROJECTS AND FEDERALLY MANDATED COMPLIANCE PROJECTS; AND (4) ACCOUNTING RELIEF TO ALLOW NIPSCO TO DEFER, AS A REGULATORY ASSET OR LIABILITY, CERTAIN COSTS FOR RECOVERY IN A FUTURE PROCEEDING.	))))))))))))))))))	CAUSE NO. 44688

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

REDACTED TESTIMONY OF

STACIE R. GRUCA– PUBLIC'S EXHIBIT NO. 4

JANUARY 22, 2015

Respectfully submitted,

Scott C. Franson
Attorney No. 27839
Deputy Consumer Counselor

CERTIFICATE OF SERVICE

This is to certify that a copy of the ***OUCC REDACTED TESTIMONY OF STACIE R. GRUCA*** has been served upon the following parties of record in the captioned proceeding by electronic service on January 22, 2015.

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TESTIMONY OF OUCC WITNESS STACIE R. GRUCA
CAUSE NO. 44688
NORTHERN INDIANA PUBLIC SERVICE COMPANY

I. INTRODUCTION

Q: Please state your name, business address and employment capacity.

A: My name is Stacie R. Gruca, and my business address is 115 West Washington St., Suite 1500 South, Indianapolis, Indiana 46204. I am employed by the Indiana Office of Utility Consumer Counselor ("OUCC") as a Senior Utility Analyst in the Electric Division. For a summary of my educational and professional background and my preparation for this case, please see Appendix A attached to my testimony.

Q: What is the purpose of your testimony?

A: I will provide an analysis and make recommendations on certain proposed changes to Northern Indiana Public Service Company's (hereafter "NIPSCO" or "Petitioner") Regional Transmission Organization ("RTO") Tracker and Resource Adequacy ("RA") Tracker. More specifically, I recommend the Indiana Utility Regulatory Commission ("Commission"):

(1) Approve NIPSCO's proposal to embed the test year level of off system sales ("OSS") margin sharing credits in the amount of $4,741,390 in NIPSCO's base rates.

(2) Require no sharing of OSS margins with NIPSCO; wherein 100% of OSS margins above the base rate amount of $4,741,390 is credited to customers

and 100% of OSS margins below the base rate amount (down to zero) is charged to customers.

(3) Approve NIPSCO's proposal to remove the $506,640 credit realized through the purchase of capacity and the sale of excess capacity from the test year and include capacity purchase costs and capacity sales revenues in future RA Tracker filings.

(4) Allow NIPSCO to continue its current structure of the RA Tracker wherein customers who are charged with 100% of capacity purchase costs, receive 100% of capacity sales revenues.

(5) Re-evaluate the RTO tracker and RA tracker, including the structure of each tracking mechanism, and any amount embedded in base rates in each of NIPSCO's future rate cases.

II. RTO TRACKER

Q: Please explain NIPSCO's current RTO Tracker?

A: As stated by NIPSCO Witness Mr. Daniel T. Williamson, on page 17 of his testimony, the Commission's Order in Cause No. 43526 found that NIPSCO's MISO non-fuel costs and revenues and off system sales sharing should be included in one mechanism designated as the RTO Adjustment (i.e. tracker). The Commission's Order in Cause No. 43969 approved the implementation of the RTO Adjustment approved in Cause No. 43526 known as NIPSCO's Rider 671 – Adjustment of Charges for Regional Transmission Organization Adjustment

Factor. NIPSCO updates its RTO Adjustment factors semi-annually in Cause No. 44156 RTO-XX.

Q: Is NIPSCO requesting to include any new or modified MISO non-fuel charges or credits in its RTO tracker as a result of this proceeding?

A: No. As indicated by NIPSCO in its response to the OUCC's Data Request 27-004, subpart (d), NIPSCO is not proposing to include any new or modified MISO non-fuel charges or credits in its RTO adjustment that are different from what it currently includes in the tracker. If MISO adds, removes, or alters charge types in the future, NIPSCO anticipates addressing such changes in direct testimony, providing support, and working with stakeholders for any alterations to the RTO adjustment which is consistent with past RTO adjustment filings and consistent with Rider 671.[1]

Q: What amount is currently embedded in base rates for NIPSCO's RTO Tracker?

A: MISO non-fuel charges and credits totaling \$5.3 million annually (\$2.65 million semi-annually) and OSS margins credit of \$7.6 million annually are currently embedded in NIPSCO's base rates.

Q: What amount does Petitioner propose to embed in base rates for its RTO tracker as a result of this base rate case filing?

A: NIPSCO proposes to embed \$16,585,108 in base rates for MISO non-fuel costs (net of revenues). The approximate \$16.585 million of MISO non-fuel costs reflects the test year level of MISO non-fuel charges in the amount of \$22,916,084 less certain transmission revenues in the amount of \$6,330,976. In response to the OUCC's Data Request 36-004, Petitioner indicated that the

[1] *See* Attachment SRG-1, NIPSCO's response to OUCC DR 27-004.

increase in test year MISO non-fuel costs, when compared to annual MISO non-fuel costs currently included in base rates, is attributed primarily to two line items: 1) Transmission Expansion Projects (Schedule 26) charges of $2.8 million, and 2) Multi-Value Projects (Schedule 26A) charges of $8.6 million (which MISO began billing in January 2012).[2]

Additionally, NIPSCO proposes to embed a base rate credit of $4,741,390 for OSS margins. This amount reflects the test year level of OSS margins.

Q: Is Petitioner's request to embed a credit of $4,741,390 in base rates for OSS margins reasonable?

A: Yes, based on my analysis, embedding a credit for OSS margins at the test year level of approximately $4.741 million seems reasonable.

Q: Please explain the analysis you conducted with respect to OSS margins.

A: Table 1 below illustrates NIPSCO's actual OSS margins for each calendar year during the five-year period 2011 through 2015.

Table 1 – Historical OSS Margins[3]

Actual OSS Margins 2011	$6.852 Million
Actual OSS Margins 2012	$2.036 Million
Actual OSS Margins 2013	$6.890 Million
Actual OSS Margins 2014	$15.679 Million
Actual OSS Margins 2015	$1.806 Million

In response to the OUCC's Data Request 36-005, NIPSCO indicated OSS margins were relatively lower in 2012 and 2015 than other prior and/or

[2] *See* Attachment SRG-2, NIPSCO's response to OUCC DR 36-004.
[3] *See* Attachment SRG-3, NIPSCO response to OUCC DR 23-001, subparts (a), (b), (c), (d), (e), and (g) and OUCC DR 23-002 for support to figures provided in Table 1.

subsequent years due to low natural gas prices, which translated to low electric prices. The low electric prices resulted in less of an opportunity for NIPSCO's generation to be dispatched by MISO.[4] Additionally, in response to the OUCC's Data Request 37-001, NIPSCO indicated that the relatively higher OSS margins realized in 2014 were a result of OSS opportunities during the winter months (i.e. the "Polar Vortex").[5] NIPSCO further stated in its response to the OUCC's Data Request 37-001:

> In particular NIPSCO's service territory experienced its coldest winter in 86 years with temperatures below normal 70% of the time. The extreme and sustained cold caused natural gas deliverability issues throughout MISO and PJM footprints. The natural gas deliverability issues coupled with very high demand for natural gas powered generation that was suddenly unavailable due to natural gas deliverability constraints manifested in volatile daily natural gas and electric prices. NIPSCO's generation was available and was subsequently dispatched by MISO due to the high LMPs resulting in strong off-system sales opportunities in the first quarter 2014. The extreme weather conditions causing volatile energy prices is not something the market, nor NIPSCO, would have expected and is the primary reason 2014 led to higher OSS margins when compared to other years.

Table 2 below illustrates NIPSCO's projected OSS margins for each calendar year during the five-year period 2016 through 2020. As shown in Table 2, [redacted].

[4] *See* Attachment SRG-4, NIPSCO's response to OUCC DR 36-005.
[5] *See* Attachment SRG-5, NIPSCO's response to OUCC DR 37-001.

Table 2 – Projected OSS Margins[6]

Projected OSS Margins 2016	[redacted]
Projected OSS Margins 2017	[redacted]
Projected OSS Margins 2018	[redacted]
Projected OSS Margins 2019	[redacted]
Projected OSS Margins 2020	[redacted]

Moreover, in NIPSCO's response to the OUCC's Data Request 23-003, NIPSCO indicated that projections were created in August 2015 and since then electric on-peak pricing has fallen 14% in 2016 and natural gas prices have fallen 23% for the same time period. Additionally for years 2017-2020 the pricing is down 9% for electric and between 12% and 16% for natural gas, which NIPSCO indicated would serve to further reduce projected OSS margins. However at this time NIPSCO has not performed any subsequent refresh to its financial planning projections for OSS margins.

Table 3 below shows Petitioner's: 1) test year OSS margins; 2) five-year average of historical OSS margins; 3) five-year average of projected OSS margins; 4) two-year average of projected OSS margins; and 5) average of 3 years of historical data (actual OSS margins for calendar years 2011, 2012, and 2015)

[6] *See* Attachment SRG-6 (page 1 of 2), NIPSCO's response to OUCC DR 23-003 and Confidential Attachment SRG-6 (page 2 of 2), NIPSCO's response to OUCC DR 23-003 Confidential Attachment A, for support to figures provided in Table 2.

and 2 years of projections (projected OSS margins for calendar years 2016 and 2017).[7]

Table 3 – Test Year Actual, Historical Actual, Projected Average, and Historical/Projected Averages OSS Margins[8]

Test Year OSS Margins (12-Months Ending March 2015)	$4.731 Million
Five-Year Average Historical OSS Margins (2011 – 2015)	[redacted]
Five-Year Average Projected OSS Margins (2016 – 2020)	[redacted]
Two-Year Average of Projected OSS Margins (2016-2017)	[redacted]
Average of 3 Years of Lowest Historical and 2 Years of Lowest Projected OSS Margins (2011, 2012, 2015, 2016, and 2017)	[redacted]

By comparison, these figures ranging from [redacted] million to [redacted] million, all support the reasonableness of a base rate credit of approximately $4.731 million for OSS margins, as NIPSCO's proposed base rate credit amount is [redacted].

Additionally, prior Commission Orders have generally supported taking into account both historical and projected data when determining a reasonable level of OSS margins. In the Commission's Order in Cause No. 43839 in regard to Vectren Energy Delivery of Indiana, Inc. with respect to Wholesale Power Marketing ("WPM") margins, the Commission stated, "Although we rely upon an historic test year, in certain circumstances we can and do look at forward

[7] This five-year average is calculated based on the five years of OSS margins that produced either the lowest actual OSS margins or the lowest projected OSS margins during the 10 year period 2011-2020.
[8] Figures in Table 3 were calculated based on information provided in NIPSCO response to OUCC DR 23-001, 23-002 and OUCC DR 23-003 (*See* Attachment SRG-3 and Confidential Attachment SRG-6).

projections to determine a reasonable level of expense and revenue."[9] Additionally in the same Order, the Commission stated, "Like other revenues and expenses, the wholesale margin credit should be set at a level that reasonably represents likely results in the future."

Q: What is Petitioner's current treatment of OSS margins sharing within its RTO tracker?

A: Currently OSS margins are shared 50/50 above the credit of $7.6 million embedded in base rates; wherein 50% of the annual margin above the $7.6 million is credited to the customer.

Q: Does Petitioner propose to make changes to the sharing of OSS margins within its RTO tracker?

A: Yes. NIPSCO proposes a 50/50 sharing of OSS margins above *and* below the test year value of $4,741,390, wherein 50% of the annual margin above the approximate $4.741 million would be credited to the customer or 50% of the margin below the approximate $4.741 million would be charged to the customer. The credit or charge would be determined annually and incorporated into NIPSCO's RTO Tracker filed semi-annually with the Commission in Cause No. 44156 RTO-XX.

Q: Do you agree with Petitioner's proposed changes to the sharing of OSS margins in the RTO tracker?

A: No.

Q: What do you recommend as an alternative approach to the sharing of OSS margins?

A: I recommend no sharing of OSS margins; wherein customers receive 100% of all OSS margins greater than zero dollars. Under this alternative structure, to the

[9] Vectren Energy Delivery of Indiana, Inc. ("Vectren South Electric"), Final Order Cause No. 43839, Page 40.

extent that annual OSS margins exceed the proposed approximate $4.741 million embedded in base rates, the excess would be credited 100% to retail customers, resulting in a credit on the customer's bill. If annual OSS margins are less than the base amount (but greater than zero dollars), I recommend that 100% of the deficit be charged to retail customers.

Q: Please explain the rationale for this proposed alternative structure.

A: First, ratepayers pay NIPSCO's retail rates to support the operation and maintenance expenses and provide a return of and a return on the assets that support these sales. Therefore, NIPSCO ratepayers should be the ones to benefit from such OSS margins.

Secondly, MISO plays the primary role in administering off system sales of NIPSCO's excess generation, and it is NIPSCO's retail ratepayers who will pay the MISO administrative fees for this service. Beginning on the bottom of page 19 of Mr. Daniel T. Williamson's testimony, he describes OSS, stating, "Off-system sales occur when NIPSCO's real-time generation resources exceed the real-time native load obligation." NIPSCO further explained in response to the OUCC's Data Request 23-005, subpart (e),[10] that consistent with the process approved in NIPSCO's quarterly Fuel Adjustment Clause filings, NIPSCO has an internal system called the Resource Cost and Allocation System ("RCA"). The RCA system utilizes meter values for NIPSCO's generation, real-time load calculations, and MISO settlement information to determine NIPSCO's net position. The RCA system also determines the MWh that are sold by "stacking"

[10] *See* Attachment SRG-7, NIPSCO's response to OUCC DR 23-005.

the available MWh. In NIPSCO's response to the OUCC's data request 23-005, subparts (b) and (c), NIPSCO indicated that NIPSCO offers its generation into the MISO Market only, and all off-system sales occur through MISO.[10] In response to OUCC's Data Request 23-005, subpart (d), NIPSCO indicated that it does not have any bilateral contracts for off-system sales.[10] So in essence, NIPSCO offers its available generation into the MISO market, based on its operating conditions expected for the day ahead. If NIPSCO has offered more available generation into the market than is needed to buy back for its own load, then MISO may take that excess generation and sell it in the real-time market, thus resulting in an OSS. Although NIPSCO has a RCA system that determines NIPSCO's net position, as well as the MWh sold, it is MISO's administration of unit dispatch and MISO's energy markets that ensure demand and operating reserve requirements are satisfied and manage transmission congestion. It is MISO's energy market that compares offers to sell energy with bids to buy energy. It is MISO that performs its regional commitment and dispatch functions using computer programs that evaluate supply offers, demand bids, operating reserve requirements and all physical characteristics of the regional transmission system. It is MISO's programs that identify the most cost-effective unit commitment and dispatch, after which instructions are sent to each generator indicating whether the generating unit should inject power into the transmission system, and the quantity and timing of such injections. Although NIPSCO provides unit commitment and unit dispatch characteristics of its offers for use in MISO's computer programs, and determines its net position and MWh sold for purposes of FAC filings and determining OSS margins within RTO filings, it is MISO's administration of unit dispatch and MISO's energy markets that play the primary role in the completion of an OSS.

Lastly, in previous Indiana electric investor-owned utility base rate cases the Commission authorized equal sharing of OSS (50/50) between customers and shareholders as a way to incent the utility to maximize OSS.[11] NIPSCO indicated that the 50/50 sharing of OSS margins provides NIPSCO an incentive to maximize the use of its generation facilities.[12] However, maximizing the use of its generation facilities is something NIPSCO should be doing as a part of normal utility business practice in order to mitigate the costs to the ratepayers that are paying for those generating facilities and does not necessitate an incentive.

Providing Petitioner with a share of OSS margins no longer is necessary given that: 1) Ratepayers are the ones who pay NIPSCO's retail rates to support the operation and maintenance expenses and provide a return of and a return on the assets that support these sales; 2) MISO plays the primary role in administering off system sales of NIPSCO's excess generation, and it is NIPSCO's retail ratepayers who will pay the MISO administrative fees for this service; and 3) Maximizing the use of NIPSCO's generation facilities is something that should be done as a part of normal utility business practice in order to mitigate the costs to the ratepayers that are paying for those generating facilities.

[11] Commission Order in Cause No. 44075 dated February 13, 2013, Indiana Michigan Power Company, Page 54, Commission Discussion and Findings, Paragraph 1 and Commission Order in Cause No. 43839 dated April 27, 2011, Vectren South Electric, Page 41, Commission Findings, First Full Paragraph.
[12] NIPSCO Witness Mr. Frank A. Shambo testimony, page 42, lines 10-13.

Like Petitioner, our recommended alternative structure still allows for a symmetrical approach wherein if annual OSS margins are greater than NIPSCO's proposed base level of $4,741,390, 100% of that excess will be credited to retail customers, resulting in a credit on the customer's bill. If annual OSS margins are less than the base level (but greater than zero dollars), 100% of that deficit will be charged to retail customers, resulting in a charge on the customer's bill. Should the Commission permit any sharing of OSS margins above and/or below the embedded amount, then any such sharing should be temporary in nature and subject to complete re-evaluation at the time of NIPSCO's next base rate case in addition to complete re-evaluation of an embedded base rate amount for OSS margins.

III. RESOURCE ADEQUACY TRACKER

Q: Please explain NIPSCO's current RA Tracker.

A: As explained by Mr. Daniel T. Williamson, beginning at the bottom of page 13 of his testimony, the Commission's Order in Cause No. 43526 approved a purchase capacity cost recovery mechanism referred to as the Resource Adequacy or RA Adjustment, for recovery of NIPSCO's incurred capacity costs. The Commission's Order in Cause No. 43969 approved the implementation of a RA Adjustment previously approved in Cause No. 43526 known as NIPSCO's Rider 674 – Adjustment of Charges for Resource Adequacy and NIPSCO's Appendix F – Resource Adequacy Adjustment Factor. The Commission's Order in Cause No. 43969 specified that the RA Adjustment will recover incurred capacity costs and seventy-five percent of costs associated with any credits paid as a result of Rider 675 (Interruptible Industrial Service Rider.) The Commission Order also found that, due to the lag between payment and recovery of credits, the actual amount of credits paid will be deferred in a balance sheet account until they are recovered in the RA Adjustment or in the FAC.

Q: Does Petitioner propose to embed an amount in base rates for capacity in this case?

A: No. Petitioner proposes to remove the credit of $506,640 realized through the purchase of capacity and the sale of excess capacity from the test year and maintain full tracking of all costs and/or credits associated with capacity within the RA tracker. In support of full tracking of all capacity costs and/or credits NIPSCO indicated that it relies on the MISO Planning Resource Auction to sell excess capacity. The MISO Planning Resource Auction clearing prices associated with capacity and realized through the auction process can vary, and NIPSCO does not control those prices.

Q: Do you have any concerns with Petitioner's proposed adjustment to remove the test year level of capacity costs/credits and maintain full tracking of capacity costs/credits?

A: No. We do not have concerns with NIPSCO making the proposed adjustment for capacity costs and/or credits and maintaining full tracking of capacity costs and/or credits in its RA tracker. Additionally, the OUCC supports Petitioner continuing the current treatment of capacity purchase costs and capacity sales revenues in the RA tracker, wherein capacity revenues from the sale of capacity are netted against capacity purchase costs and any additional capacity sales revenue (profit) is used to reduce customer rates and mitigate the impact of rate increases faced by NIPSCO customers.

IV. RECOMMENDATIONS

Q: What do you recommend with respect to certain proposed changes to NIPSCO's RTO Tracker?

A: I recommend the Commission:

(1) Approve NIPSCO's proposal to embed the test year level of OSS margin sharing credits in the amount of $4,741,390 in NIPSCO's base rates.

(2) Require no sharing of OSS margins with NIPSCO; wherein 100% of OSS margins above the base rate amount of $4,741,390 is credited to customers and 100% of OSS margins below the base rate amount (down to zero) is charged to customers.

(3) Re-evaluate the RTO tracker including the structure of the tracking mechanism, and any amount embedded in base rates in each of NIPSCO's future rate cases.

Q: What do you recommend with respect to certain proposed changes to NIPSCO's RA Tracker?

A: I recommend the Commission:

(1) Approve NIPSCO's proposal to remove the $506,640 credit realized through the purchase of capacity and the sale of excess capacity from the test year and include capacity purchase costs and capacity sales revenues in future RA Tracker filings;

(2) Allow NIPSCO to continue its current structure of the RA Tracker wherein customers who are charged with 100% of capacity purchase costs, receive 100% of capacity sales revenues.

(3) Re-evaluate the RA tracker, including the structure of the tracking mechanism, and any amount embedded in base rates in each of NIPSCO's future rate cases.

Q: Does this conclude your testimony?

A: Yes, it does.

APPENDIX A

Q: Please summarize your professional background and experience.

A: I graduated from Indiana University, Indianapolis, with a Bachelor of Science degree in Business, majoring in Accounting, Finance, and International Studies. I joined the OUCC in 2003. Since then, I have attended seminars on demand side management and energy efficiency issues. I attended "Practical Skills for the Changing Electric and Gas Industries," sponsored by the National Association of Regulatory Utility Commissioners ("NARUC") and the New Mexico State University Center for Public Utilities, in Albuquerque, New Mexico. I also attended the 2003 Annual Regulatory Studies Program sponsored by NARUC and the Institute of Public Utilities at Michigan State University in East Lansing, Michigan, and the 37th Annual Eastern NARUC Utility Rate School sponsored by NARUC and the Institute of Public Utilities at Michigan State University in Clearwater, Florida. I have attended various Market Subcommittee, Market Settlements Work Group, and Revenue Sufficiency Guarantee ("RSG") Task Force meetings of the Midcontinent Independent System Operator, Inc. ("MISO").

Q: Please describe your duties and responsibilities at the OUCC.

A: I review Indiana electric utilities' requests for regulatory relief filed with the Commission. I also prepare and present testimony based on the results of my analysis and make recommendations to the Commission on behalf of Indiana electric utility consumers.

Q: Have you previously testified before the Commission?

A: Yes.

Q: Please describe the examination and analysis you conducted in order to prepare your testimony and schedules in this Cause.

A: I read and reviewed Petitioner's verified petition, prefiled testimony, exhibits, and various work papers. I also reviewed Petitioner's response to various OUCC data requests and participated in discussions with NIPSCO Staff.

Q: Do you have experience working with other utilities' OSS and/or Capacity trackers (or other related rate adjustment mechanism)?

A: Yes. I have testified in the following cases which include recovery of OSS margins and/or capacity purchase costs and sales revenues:

1. Cause No. 43406, Vectren South Electric's ("VSE") Reliability Cost and Revenue Adjustment ("RCRA") tracker, which includes the recovery of wholesale power marketing ("WPM") margins and capacity purchase costs and sales revenues.

2. Cause No. 44348, Duke Energy Indiana's ("DEI") Summer Reliability Adjustment ("SRA") tracker, which includes the recovery of non-native sales profits and capacity purchase costs and sales revenues.

3. Cause No. 44156, Northern Indiana Public Service Company's ("NIPSCO") Regional Transmission Organization ("RTO") adjustment tracker, which includes the recovery of OSS margins.

4. Cause No. 43775, Indiana Michigan Power Company's ("I&M") OSS Margin Sharing tracker.

5. Cause No. 44155, NIPSCO's Resource Adequacy ("RA") tracker, which includes recovery of capacity purchase costs and sales revenues.

I also have experience with respect to the recovery of capacity purchase costs and sales revenues in Cause No. 44422, I&M's Capacity Settlements Rider ("CSR").

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 27

<table>
<tr><td><u>OUCC Request 27-004:</u></td></tr>
<tr><td>In reference to NIPSCO's RTO Tracker and MISO non-fuel charges, please respond to the following:

a. Please provide a breakdown (by month) of the amount (in dollars) of NIPSCO's forecasted MISO Non-Fuel costs and revenues (in excel format where applicable) for calendar years 2016, 2017, 2018, 2019, and 2020.
b. Please provide a breakdown (by month) of the amount (in dollars) of NIPSCO's actual (where available) and/or forecasted MISO Non-fuel costs and revenues (in excel format where applicable) during the period April 1, 2015 through December 31, 2015.
c. Please explain how forecasted MISO Non-Fuel costs and revenues are determined (including the foundation and/or process NIPSCO utilizes in making its forecast).
d. Are any of the MISO charges and credits that NIPSCO proposes to include in its RTO Adjustment, and included in the chart on pages 18 and 19 of NIPSCO witness Williamson's testimony, new or modified MISO non-fuel charges (i.e. different from the MISO charges and credits that NIPSCO currently includes in their RTO tracker)?</td></tr>
<tr><td><u>Objections:</u></td></tr>
<tr><td>NIPSCO objects to subparts (a) and (b) of this Request on the grounds and to the extent that this Request solicits an analysis, calculations or compilation which has not already been performed and which NIPSCO objects to performing.</td></tr>
<tr><td><u>Response:</u></td></tr>
<tr><td>Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response:

a. Please see file attached hereto as OUCC Set 27-004 Attachment A for a breakdown (by month) for 2016 and 2017 and an annual amount for 2018, 2019 and 2020 (in dollars) of NIPSCO's forecasted MISO Non-Fuel costs and revenues.
b. Please see file attached hereto as OUCC Set 27-004 Attachment B for a breakdown (by month) of the amount (in dollars) of NIPSCO's actual (where available) and/or</td></tr>
</table>

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 27

forecasted MISO Non-fuel costs and revenues (in excel format where applicable) during the period April 1, 2015 through November 30, 2015. NIPSCO will supplement this response with December 31, 2015 when available.

c. As shown below, there are three sources of information that NIPSCO uses to construct the RTO forecast. The first one uses the results from NIPSCO's production cost modeling system, PROMOD to determine load and resource volumetric determinants. This is the same type of methodology used in the quarterly FAC process. The second source of information is utilizing the latest forecasted rates provided by MISO. The third source of information uses historical averaging.

FORECAST ITEMS	PROMOD	RATES FROM MISO	HISTORICAL AVERAGING
Schedule 1 Revenue			X
Schedule 2 Revenue			X
Schedule 7 Revenue			X
Schedule 8 Revenue			X
Schedule 26 Revenue (1)			
Schedule 37 Revenue			X
Schedule 38 Revenue			X
Schedule 10-FERC	X	X	
Schedule 10	X	X	
Schedule 16	X	X	
Schedule 17	X	X	
Schedule 24			X
Schedule 26 Costs		X	
Schedule 26A	X	X	
Miscellaneous - Transmission (2)			
RT Miscellaneous - Energy (2)			
Revenue Neutrality Uplift			X
MVP Distribution Uplift			X
Notes:			
(1) Schedule 26 Revenue is extracted from the latest available NIPSCO's annual GG filing to MISO			
(2) NIPSCO does not forecast any Miscellaneous charges or credits from the Energy and Transmission Settlement systems			

d. There are no new or modified MISO non-fuel charges (i.e. different from the MISO

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 27

charges and credits that NIPSCO currently includes in their RTO tracker) proposed for inclusion in the RTO adjustment since the end of the test-year ending March 31, 2015. Consistent with Commission approved RTO adjustments filed in the past, NIPSCO has proposed and been granted recovery of new MISO charges as they have been added by MISO. If MISO adds, removes, or alters charge types in the future, NIPSCO would anticipate addressing these changes in direct testimony, providing adequate support, and working with stakeholders for any alterations to the RTO adjustment as consistent with past RTO adjustment filings and consistent with Rider 671 (or 771).

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 36

OUCC Request 36-004:
NIPSCO proposes to include in its base rates $16.5 million (test year amount) for MISO non-fuel costs. NIPSCO's current annual base rate amount for MISO non-fuel costs is $5.3 million. Please state each component and/or key factor, and provide support (i.e. explanation and/or documentation), which drive the increase in MISO non-fuel charges.
Objections:
Response:
The increase of $11.2 million was attributed primarily in two line items from MISO. The Transmission Expansion Projects (Schedule 26) charges of $2.8 million and the Multi-Value Projects (Schedule 26A) charges of $8.6 million. Starting in January, 2012 MISO began the billing of the Schedule 26A charges. Please see the file attached hereto as OUCC Set 36-004 Attachment A for a further comparison.

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 23

OUCC Request 23-001:
For off-system sales, please provide a breakdown by month of actual: (1) kWhs sold; (2) fuel cost; (3) production cost; (4) total revenue; and (5) resulting OSS margins, in Excel format, if applicable, for the following time periods: a. Twelve months ending March 31, 2015 (test year); b. Calendar year ending December 31, 2014; c. Calendar year ending December 31, 2013; d. Calendar year ending December 31, 2012; e. Calendar year ending December 31, 2011; f. Calendar year ending December 31, 2010; and g. Most current monthly data available following the test year.
Objections:
NIPSCO objects to this Request on the grounds and to the extent that this Request solicits an analysis, calculation or compilation which has not already been performed and which NIPSCO objects to performing.
Response:
Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response: Please see the file attached hereto as OUCC Set 23-001 Attachment A.

NORTHERN INDIANA PUBLIC SERVICE COMPANY
NIPSCO Off System Sales By Month

	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15
OSS MWh's	-	4,537	3,658	61,744	84,779	-	-	118,334	47,303	28,974	60,519	9,587
OSS Revenue	$ -	$ 169,478	$ 112,474	$ 2,032,799	$ 2,845,086	$ -	$ -	$ 4,270,371	$ 1,380,586	$ 837,339	$ 2,624,300	$ 301,275
OSS Costs	$ 37,617	$ 108,146	$ 88,231	$ 1,383,634	$ 1,997,392	$ 3,354	$ -	$ 2,717,011	$ 1,102,186	$ 675,319	$ 1,487,917	$ 231,511
OSS Margin	$ (37,617)	$ 61,332	$ 24,243	$ 649,164	$ 847,694	$ (3,354)	$ -	$ 1,553,360	$ 278,400	$ 162,020	$ 1,136,383	$ 69,764

Note:
- NIPSCO Off System Sales Margin is before sharing
- OSS costs include fuel cost, MISO related non fuel costs/credits and prior period adjustments.

NORTHERN INDIANA PUBLIC SERVICE COMPANY
NIPSCO Off System Sales By Month

	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14
OSS MWh's	82,789	131,175	62,944	-	4,537	3,658	61,744	84,779	-	-	118,334	47,303
OSS Revenue	$ 8,923,140	$ 6,971,512	$ 5,506,841	$ 17	$ 169,478	$ 112,474	$ 2,032,799	$ 2,845,086	$ -	$ -	$ 4,270,371	$ 1,380,586
OSS Costs	$ 2,595,071	$ 3,816,700	$ 2,683,521	$ 37,634	$ 108,146	$ 88,231	$ 1,383,634	$ 1,997,392	$ 3,354	$ -	$ 2,717,011	$ 1,102,186
OSS Margin	$ 6,328,069	$ 3,154,812	$ 2,823,320	$ (37,617)	$ 61,332	$ 24,243	$ 649,164	$ 847,694	$ (3,354)	$ -	$ 1,553,360	$ 278,400

Note:
- NIPSCO Off System Sales Margin is before sharing
- OSS costs include fuel cost, MISO related non fuel costs/credits and prior period adjustments.

NORTHERN INDIANA PUBLIC SERVICE COMPANY
NIPSCO Off System Sales By Month

	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13
OSS MWh's	24,000	1	27,408	353,315	70,839	31,726	52,118	36,517	7,030	-	-	4,438
OSS Revenue	$ 733,170	$ 608	$ 930,188	$ 12,647,754	$ 2,395,909	$ 1,017,799	$ 1,659,121	$ 1,161,659	$ 235,632	$ -	$ (151)	$ 149,708
OSS Costs	$ 554,306	$ 555	$ 679,015	$ 8,264,365	$ 1,585,638	$ 720,082	$ 1,174,950	$ 786,229	$ 168,386	$ 746	$ -	$ 106,830
OSS Margin	$ 178,863	$ 52	$ 251,173	$ 4,383,389	$ 810,271	$ 297,717	$ 484,171	$ 375,430	$ 67,247	$ (746)	$ (151)	$ 42,877

Note:
- NIPSCO Off System Sales Margin is before sharing
- OSS costs include fuel cost, MISO related non fuel costs/credits and prior period adjustments.

NORTHERN INDIANA PUBLIC SERVICE COMPANY
NIPSCO Off System Sales By Month

	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12	Nov-12	Dec-12
OSS MWh's	13,340	-	-	537	3,894	40,898	43,365	96,055	1,393	-	4,878	8,916
OSS Revenue	$ 413,355	$ 154	$ 36	$ 15,378	$ 122,216	$ 1,354,395	$ 1,662,062	$ 3,056,803	$ 42,381	$ 448	$ 153,381	$ 269,160
OSS Costs	$ 322,022	$ 5,038	$ (10,351)	$ 11,196	$ 95,785	$ 973,092	$ 998,763	$ 2,303,780	$ 33,875	$ 40	$ 115,957	$ 204,431
OSS Margin	$ 91,333	$ (4,884)	$ 10,387	$ 4,182	$ 26,431	$ 381,303	$ 663,299	$ 753,022	$ 8,506	$ 408	$ 37,424	$ 64,730

Note:
- NIPSCO Off System Sales Margin is before sharing
- OSS costs include fuel cost, MISO related non fuel costs/credits and prior period adjustments.

NORTHERN INDIANA PUBLIC SERVICE COMPANY
NIPSCO Off System Sales By Month

	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11
OSS MWh's	47,790	6,946	614	65,742	75,921	29,878	73,332	125,878	26,940	24,191	26,927	65,883
OSS Revenue	$ 1,908,329	$ 282,181	$ 22,064	$ 2,456,000	$ 3,103,333	$ 1,230,637	$ 3,358,286	$ 4,713,398	$ 1,033,829	$ 830,025	$ 821,447	$ 2,112,128
OSS Costs	$ 1,196,985	$ 227,045	$ 34,461	$ 1,718,906	$ 2,072,476	$ 815,960	$ 2,053,136	$ 3,310,390	$ 733,699	$ 519,543	$ 654,450	$ 1,682,234
OSS Margin	$ 711,344	$ 55,136	$ (12,397)	$ 737,094	$ 1,030,857	$ 414,677	$ 1,305,150	$ 1,403,008	$ 300,130	$ 310,482	$ 166,997	$ 429,894

Note:
- NIPSCO Off System Sales Margin is before sharing
- OSS costs include fuel cost, MISO related non fuel costs/credits and prior period adjustments.

NORTHERN INDIANA PUBLIC SERVICE COMPANY
NIPSCO Off System Sales By Month

	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15
OSS MWh's	-	-	134	15,405	43,211	5,139	-	-	
OSS Revenue	$ -	-	$ 3,249	$ 470,653	$ 1,318,529	$ 161,988	$ -	$ -	
OSS Costs	$ 762	$ -	$ 3,207	$ 312,684	$ 1,058,733	$ 141,313	$ 188	$ -	
OSS Margin	$ (762)	$ -	$ 42	$ 157,969	$ 259,796	$ 20,675	$ (188)	$ -	$ -

Note:
- NIPSCO Off System Sales Margin is before sharing
- OSS costs include fuel cost, MISO related non fuel costs/credits and prior period adjustments.

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 23

OUCC Request 23-002:
Please provide the same information as requested in the above request, for any subsequent months through December 31, 2015, as actual data becomes available.
Objections:
Response:
At this time NIPSCO does not anticipate having any additional Off-System Sales through December 31, 2015. To the extent NIPSCO does have any Off-System Sales NIPSCO will provide an update.

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 36

OUCC Request 36-005:
As a follow up to NIPSCO's response to the OUCC's DR 23-001, please state each, and provide support (i.e. explanation and/or documentation) for, component and/or key factor that led to lower OSS margins in calendar year 2012 of approximately $2.036 million and calendar 2015 of approximately $1.806 million when compared to other historical years (calendar years 2011, 2013, 2014, and the test year ending March 31, 2015).
Objections:
NIPSCO objects to this Request on the grounds and to the extent that this Request seeks information that is confidential, proprietary and/or trade secret information.
Response:
Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response: Calendar years 2012 and 2015 had one primary commonalty; in that, low natural gas prices translated to low electric prices. The lower electric prices resulted in less of an opportunity for NIPSCO's generation to be dispatched by MISO. In general during the on-peak periods, NIPSCO needs to have all of its coal generation, plus Sugar Creek, online to have the opportunity to realize notable volumes of off-system sales. With the lower electric prices in 2012 and 2015 the opportunity for NIPSCO to have enough generation online to realize off-system sales was reduced. Furthermore, the times NIPSCO was able to realize off-system sales resulted in lower margins per megawatt-hour due to the lower electric prices.

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 37

OUCC Request 37-001:
As a follow up to NIPSCO's response to the OUCC's DR 23-001, please state each, and provide support (i.e. explanation and/or documentation) for, component and/or key factor that led to higher OSS margins in calendar year 2014 totaling approximately \$15.679 million when compared to other historical years (calendar years 2011, 2012, 2013, 2015, and the test year ending March 31, 2015).
Objections:
Response:
The higher off-system sales ("OSS") margins realized in 2014 were a result of off-system sales opportunities during the winter months (i.e., the "Polar Vortex"). In particular, NIPSCO's service territory experienced its coldest winter in 86 years with temperatures below normal 70% of the time. The extreme and sustained cold caused natural gas deliverability issues throughout MISO and PJM footprints. The natural gas deliverability issues coupled with very high demand for natural gas powered generation that was suddenly unavailable due to natural gas deliverability constraints manifested in volatile daily natural gas and electric prices. NIPSCO's generation was available and was subsequently dispatched by MISO due to the high LMPs resulting in strong off-system sales opportunities in the first quarter of 2014. The extreme weather conditions causing volatile energy prices is not something the market, nor NIPSCO, would have expected and is the primary reason 2014 led to higher OSS margins when compared to the other years.

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 23

OUCC Request 23-003:
For off-system sales, please provide a breakdown by month of projected/estimated: (1) kWhs sold; (2) fuel cost; (3) production cost; (4) total revenue; and (5) resulting OSS margins, in Excel format, if applicable, for the following time periods: a. Twelve months following the most current month of actual data available; b. Calendar year ending December 31, 2016; c. Calendar year ending December 31, 2017; d. Calendar year ending December 31, 2018; e. Calendar year ending December 31, 2019; and f. Calendar year ending December 31, 2020.
Objections:
NIPSCO objects to this Request on the grounds and to the extent that this Request seeks information that is confidential, proprietary and/or trade secret information. NIPSCO further objects to this Request on the separate and independent grounds and to the extent that this Request solicits an analysis, calculation or compilation which has not already been performed and which NIPSCO objects to performing.
Response:
Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response: Please see the file attached hereto as OUCC Set 23-003 Confidential Attachment A for a by month view of projected Off-System Sales ("OSS") volumes, revenue, and cost as provided as part of NIPSCO's financial planning process. These projections were created in August of 2015 and since then there has been reductions in natural gas prices and electricity prices that would serve to reduce these projected OSS margins. However, at this time, there has not been any subsequent refresh performed to NIPSCO's financial planning projections for OSS margins. Since the projections electric on-peak pricing has fallen 14% in 2016 and natural gas prices have fallen 23% for the same time period. For the out years 2017 – 2020 the pricing is down 9% for electric and between 12% and 16% for natural gas. Please see NIPSCO's response to OUCC Request 23-004 for further detail on how these projections were formed.

CONFIDENTIAL

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 23

<u>OUCC Request 23-005:</u>

Beginning at the bottom of page 19 of his testimony in this Cause, Mr. Williamson states, "Off-system sales occur when NIPSCO's real-time generation resources exceed the real-time native load obligation." In reference to this statement, please respond to the following:

a. As a MISO Market Participant, is NIPSCO *required* to offer all of its available generation resources into MISO?
b. Does NISPCO offer all of its generation resources into MISO? If no, please identify what generation resources it does not offer into MISO.
c. Do all of NIPSCO's off-system sales occur through MISO? If no, please explain.
d. Does NIPSCO have any bilateral contracts for off-system sales? If yes, please identify with whom bilateral off-system sale contracts/transactions are with, the kWh sold, and the price per kWh.
e. Does MISO complete the off-system sale transaction when NIPSCO's real-time generation resources exceed the real-time native load obligation? If no, please explain the process that takes place when an off-system sale of power occurs.

<u>Objections:</u>

<u>Response:</u>

a. NIPSCO is required to offer any generation that it claims capacity against its load obligation or sells either into the MISO Planning Resource Auction or bilaterally. The only times NIPSCO is not obligated to offer its generation into the market is during times of outage (forced or planned) or force majeure events.

b. Yes, NIPSCO offers its generation into the MISO Market only.

c. Yes, all the off-system sales occur through MISO.

d. No, NIPSCO does not have any bilateral contracts for off-system sales. However, NIPSCO does have bilateral contracts in place for its Wind PPAs and Feed-In Tariff ("FIT") PPAs (greater than 1 MW of installed capacity due to measurement and validation complexities). Any off-system sales that occur as a result of those generation purchases are directly credited back to the customer.

Cause No. 44688
Northern Indiana Public Service Company's
Objections and Responses to
Indiana Office of Utility Counselor's Data Request Set No. 23

These "Customer OSS" are not included within the off-system sales margins associated with this proceeding (Cause No. 44688).

e. No, MISO does not complete the transaction. Consistent with the process approved in NIPSCO's quarterly Fuel Adjustment Clause filings, NIPSCO has an internal system called the Resource Cost and Allocation System "RCA". This system utilizes meter values for NIPSCO generation, real-time load calculations, and MISO settlement information to determine NIPSCO's net position. When NIPSCO's real-time generation resources exceed the real-time native load obligation an off-system sale occurs and the MWh that are "sold" are priced at the highest incremental cost associated with NIPSCO's generation on the system with the remaining MWh serving NIPSCO's native load obligation. The revenue associated with the sale is determined by taking the applicable day-ahead or real-time MISO LMP at the generating node depending on where the generator is relative to its day-ahead MISO award. The RCA system determines the MWh that are sold by "stacking" the available MWh from lowest to highest incremental cost. At times when the real-time generation resources are below the real-time native load obligation NIPSCO is a net buyer and no off-system sales occur.

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.

Stacie R. Gruca

Stacie R. Gruca
Senior Utility Analyst
Indiana Office of Utility Consumer Counselor

January 22, 2016
Date

Cause No. 44688
NIPSCO