

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

TESTIMONY OF

GLENN A. WATKINS – PUBLIC’S EXHIBIT NO. 11

JANUARY 22, 2015

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

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

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CAUSE NO. 44688

VERIFIED DIRECT TESTIMONY

OF

GLENN A. WATKINS

ON BEHALF OF THE

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

JANUARY 22, 2016

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1  
2 **VERIFIED DIRECT TESTIMONY OF GLENN A. WATKINS**  
3 **ON BEHALF OF**  
4 **INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR**  
5  
6

7 **I. INTRODUCTION**  
8

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

10 A. My name is Glenn A. Watkins. My business address is 9030 Stony Point Parkway, Suite  
11 580, Richmond, Virginia 23235.  
12

13 **Q. WHAT IS YOUR PROFESSIONAL AND EDUCATIONAL BACKGROUND?**

14 A. I am a Principal and Senior Economist with Technical Associates, Inc., which is an  
15 economics and financial consulting firm with an office in Richmond, Virginia. Except  
16 for a six month period during 1987 in which I was employed by Old Dominion Electric  
17 Cooperative, as its forecasting and rate economist, I have been employed by Technical  
18 Associates continuously since 1980.  
19

20 During my 35-year career at Technical Associates, I have conducted hundreds of  
21 marginal and embedded cost of service, rate design, cost of capital, revenue requirement,  
22 and load forecasting studies involving electric, gas, water/wastewater, and telephone  
23 utilities throughout the United States and Canada and have provided expert testimony in  
24 Alabama, Arizona, Delaware, Georgia, Illinois, Indiana, Kansas, Kentucky, Maine,  
25 Maryland, Massachusetts, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania,  
26 Vermont, Virginia, South Carolina, Washington, and West Virginia. In addition, I have  
27 provided expert testimony before State and Federal courts as well as before State  
28 legislatures. A more complete description of my education and experience is provided in  
29 Attachment GAW-1.  
30

31 **Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY BEFORE THIS**  
32 **COMMISSION?**

1 A. Yes. I recently provided testimony on behalf of the Office of Utility Consumer  
2 Counselor ("OUCC") in the pending Indianapolis Power & Light Company rate case.  
3

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

5 A. Technical Associates has been retained by the OUCC to assist in its evaluation of the  
6 accuracy and reasonableness of Northern Indiana Public Service Company's ("NIPSCO"  
7 or "Company") retail class cost of service study, proposed distribution of revenues by  
8 class, rate design, and other tariff issues. The purpose of my testimony, therefore, is to  
9 comment on NIPSCO's proposals on these issues and to present my findings and  
10 recommendations based on the results of the studies I have undertaken on behalf of the  
11 OUCC.  
12

13 **II. SUMMARY OF TESTIMONY**

14  
15 **Q. PLEASE PROVIDE A SUMMARY OF YOUR FINDINGS AND  
16 RECOMMENDATIONS IN THIS CASE.**

17 A. With regard to class cost allocations (class cost of service), I have determined that  
18 NIPSCO's proposed allocation of fixed generation costs based on the 4-CP method does  
19 not reflect cost causation imposed upon NIPSCO and should not be relied upon. Instead,  
20 I have conducted my studies based upon the 12-CP, Probability of Dispatch, Base-  
21 Intermediate-Peak, and Peak & Average methods. I have no other cost allocation  
22 disagreements with Dr. Gaske's study. When my recommended cost of service studies  
23 are considered, a significantly different level of profits (ROR) at current rates is obtained  
24 as well as attendant class revenue responsibility.  
25

26 With regard to the distribution of any overall increase authorized in this case to individual  
27 classes, I have developed a different recommendation to that proposed by Dr. Gaske. My  
28 recommendation considers the results of several cost allocation methodologies as well as  
29 recognition of the ratemaking principle of gradualism.  
30

1 NIPSCO's proposed large increases to the residential and small commercial fixed  
2 monthly customer charges should be rejected wherein the current rates should be  
3 maintained.

4  
5 **III. CLASS COST OF SERVICE**

6  
7 **Q. PLEASE BRIEFLY EXPLAIN THE CONCEPT OF A CLASS COST OF**  
8 **SERVICE STUDY ("CCOSS") AND ITS PURPOSE IN A RATE PROCEEDING.**

9 A. Generally, there are two types of cost of service studies used in public utility ratemaking:  
10 marginal cost studies and embedded, or fully allocated, cost studies. Consistent with the  
11 practices of the Indiana Utility Regulatory Commission ("Commission"), NIPSCO has  
12 utilized a traditional embedded cost of service study for purposes of establishing the  
13 overall revenue requirement in this case, as well as for class cost of service purposes.

14  
15 Embedded class cost of service studies are also referred to as fully allocated cost studies  
16 because the majority of a public utility's plant investment and expense is incurred to  
17 serve all customers in a joint manner. Accordingly, most costs cannot be specifically  
18 attributed to a particular customer or group of customers. To the extent that certain costs  
19 can be specifically attributed to a particular customer or group of customers, these costs  
20 are directly assigned to that customer or group in the CCOSS. Since most of the utility's  
21 costs of providing service are jointly incurred to serve all or most customers, they must  
22 be allocated across specific customers or customer rate classes.

23  
24 It is generally accepted that to the extent possible, joint costs should be allocated to  
25 customer classes based on the concept of cost causation. That is, costs are allocated to  
26 customer classes based on analyses that measure the causes of the incurrence of costs to  
27 the utility. Although the cost analyst strives to abide by this concept to the greatest  
28 extent practical, some categories of costs, such as corporate overhead costs, cannot be  
29 attributed to specific exogenous measures or factors, and must be subjectively assigned  
30 or allocated to customer rate classes. With regard to those costs in which cost causation  
31 can be attributed, there is often disagreement among cost of service experts on what is an

1 appropriate cost causation measure or factor; e.g., peak demand, energy usage, number of  
2 customers, etc.

3  
4 **Q. WHAT ARE THE PRIMARY DRIVERS INFLUENCING ELECTRIC UTILITY**  
5 **COST ALLOCATION STUDIES?**

6 A. Although electric utility cost allocation studies tend to be somewhat complex in that  
7 several rate base and expense items tend to be allocated based on internally generated  
8 allocation factors, all allocation factors are ultimately a direct function of class  
9 contributions to: (a) demands (kW); (b) energy usage (kWh); or, (c) number of  
10 customers. In this regard, energy usage (kWh) and number of customers are readily  
11 known and measured from billing and financial records. However, class contributions to  
12 demands (kW) are not always readily known for every rate class. That is, while some  
13 larger user class' demands are known with certainty because they are metered and  
14 measured utilizing interval demand meters, other small volume class demands must be  
15 estimated based on sample data since these class' meters only measure monthly energy  
16 (kWh) usage. Because the vast majority of vertically integrated electric utilities rate base  
17 and expense account items are allocated based on some measure of demand, this is a most  
18 critical component within the cost allocation process. In other words, the estimation of  
19 class contributions to demand serve as the foundation for any class cost allocation study.  
20 Therefore, if there are deficiencies or biases within the estimation of class contributions  
21 to demand, the resulting cost allocation study will have serious deficiencies or biases and  
22 may even be meaningless.

23  
24 **Q. IN YOUR OPINION, HOW SHOULD THE RESULTS OF A CCROSS BE**  
25 **UTILIZED IN THE RATEMAKING PROCESS?**

26 A. Although there are certain principles used by all cost of service analysts, there are often  
27 significant disagreements on the specific factors that drive individual costs. These  
28 disagreements can and do arise as a result of the quality of data and level of detail  
29 available from financial records. There are also fundamental differences in opinions  
30 regarding the cost causation factors that should be considered to properly allocate costs  
31 to rate schedules or customer classes. Furthermore, and as mentioned previously,

1 numerous subjective decisions are required to allocate the myriad of jointly incurred  
2 costs.

3  
4 In these regards, two different cost studies conducted for the same utility and time period  
5 can, and often do, yield different results. As such, regulators should consider CCOSS  
6 only as a guide, with the results being used as one of many tools to assign class revenue  
7 responsibility when cost causation factors cannot be realistically ascribed to some costs.  
8

9 **Q. HAVE THE HIGHER COURTS OPINED ON THE USEFULNESS OF COST**  
10 **ALLOCATIONS FOR PURPOSES OF ESTABLISHING REVENUE**  
11 **RESPONSIBILITY AND RATES?**

12 A. Yes. In an important regulatory case involving Colorado Interstate Gas Company and  
13 the Federal Power Commission (predecessor to FERC), the United States Supreme Court  
14 stated:

15 But where as here several classes of services have a common use of the  
16 same property, difficulties of separation are obvious. Allocation of costs  
17 is not a matter for the slide-rule. It involves judgment on a myriad of  
18 facts. It has no claim to an exact science.<sup>1</sup>  
19

20 **Q. DOES YOUR OPINION, AND THE FINDINGS OF THE U.S. SUPREME**  
21 **COURT, IMPLY THAT COST ALLOCATIONS SHOULD PLAY NO ROLE IN**  
22 **THE RATEMAKING PROCESS?**

23 A. Not at all. It simply means that regulators should consider the fact that cost allocation  
24 results are not surgically precise and that alternative, yet equally defensible approaches  
25 may produce significantly different results. In this regard, when all reasonable cost  
26 allocation approaches consistently show that certain classes are over or under  
27 contributing to costs and/or profits, there is a strong rationale for assigning smaller or  
28 greater percentage rate increases to these classes. On the other hand, if one set of  
29 reasonable cost allocation approaches show dramatically different results than another  
30 reasonable approach, caution should be exercised in assigning disproportionately larger  
31 or smaller percentage increases to the classes in question.

---

<sup>1</sup> 324 U.S. 581, 65 S. Ct. 829.

1 **Q. PLEASE EXPLAIN HOW YOU PROCEEDED WITH YOUR ANALYSIS OF**  
2 **NIPSCO'S CCOSS.**

3 A. In conducting my independent analysis, I reviewed the structure and organization of the  
4 Company's CCOSS and reviewed the accuracy and completeness of the primary drivers  
5 (allocators) used to assign costs to rate schedules and classes. Next, I reviewed  
6 NIPSCO's selection of allocators to specific rate base, revenue, and expense accounts. I  
7 then verified the accuracy of NIPSCO's CCOSS model by replicating its results using  
8 my own computer model. Finally, I adjusted certain aspects of the Company's study to  
9 better reflect cost causation and cost incidence by rate schedule and customer class.

10  
11 **Q. ARE THERE CERTAIN ASPECTS OF ELECTRIC UTILITY EMBEDDED**  
12 **CCOSS THAT TEND TO BE MORE CONTROVERSIAL THAN OTHERS?**

13 A. Yes. For decades, cost allocation experts and to some degree, utility commissions, have  
14 disagreed on how generation and certain distribution plant accounts should be allocated  
15 across classes. Beyond a doubt, these two issue areas are the most contentious and often  
16 have the largest impact on the results of achieved class rates of return ("ROR").

17  
18 **A. Generation Plant**

19  
20 **Q. BEFORE YOU DISCUSS SPECIFIC COST ALLOCATION METHODOLOGIES,**  
21 **PLEASE EXPLAIN HOW GENERATION/PRODUCTION-RELATED COSTS**  
22 **ARE INCURRED; I.E., PLEASE EXPLAIN THE COST CAUSATION**  
23 **CONCEPTS RELATING TO GENERATION/PRODUCTION RESOURCES.**

24 A. Utilities design and build generation facilities to meet the energy and demand  
25 requirements of their customers on a collective basis. Because of this, and the physical  
26 laws of electricity, it is impossible to determine which customers are being served by  
27 which facilities. As such, production facilities are joint costs; i.e., used by all customers.  
28 Because of this commonality, production-related costs are not directly known for any  
29 customer or customer group and must somehow be allocated.

30

1 If all customer classes used electricity at a constant rate (load) throughout the year, there  
2 would be no disagreement as to the proper assignment of generation-related costs. All  
3 analysts would agree that energy usage in terms of kilowatt-hour ("kWh") would be the  
4 proper approach to reflect cost causation and cost incidence. However, such is not the  
5 case in that NIPSCO experiences periods (hours) of much higher demand during certain  
6 times of the year and across various hours of the day. Moreover, all customer classes do  
7 not contribute in equal proportions to these varying demands placed on the generation  
8 system. To further complicate matters the electric utility industry is unique in that there  
9 is a distinct energy/capacity trade-off relating to production costs. That is, utilities design  
10 their mix of production facilities (generation and power supply) to minimize the total  
11 costs of energy and capacity, while also ensuring there is enough available capacity to  
12 meet peak demands. The trade-off occurs between the level of fixed investment per unit  
13 of capacity kilowatt ("kW") and the variable cost of producing a unit of output (kWh).  
14 Coal and nuclear units require high capital expenditures resulting in large investment per  
15 kW, whereas smaller units with higher variable production costs generally require  
16 significantly less investment per kW. Due to varying levels of demand placed on the  
17 system over the course of each day, month, and year there is a unique optimal mix of  
18 production facilities for each utility that minimizes the total cost of capacity and energy;  
19 i.e., its cost of service.

20  
21 Therefore, as a result of the energy/capacity cost trade-off, and the fact that the service  
22 requirements of each utility are unique, many different allocation methodologies have  
23 evolved in an attempt to equitably allocate joint production costs to individual classes.

24  
25 **Q. PLEASE EXPLAIN.**

26 **A.** Total production costs vary each hour of the year. Theoretically, energy and capacity  
27 costs should be allocated to customer classes each and every hour of the year. This  
28 would result in 8,760 hourly allocations. Although such an analysis is possible with  
29 today's technology, hourly supply (generation) and demand (customer load) data is  
30 required to conduct such hour-by-hour analyses. While most utilities can and do record  
31 hourly production output, they often do not estimate class loads on an hourly basis (at

1 least not for every hour of the year). With these constraints in mind, several allocation  
2 methodologies have been developed to allocate electric utility generation plant  
3 investment and attendant costs. Each of these methods has strengths and weaknesses  
4 regarding the reasonableness in reflecting cost causation.

5  
6 **Q. APPROXIMATELY HOW MANY COST ALLOCATION METHODOLOGIES**  
7 **EXIST RELATING TO THE ALLOCATION OF GENERATION PLANT?**

8 A. The current National Association of Regulatory Utility Commissioners ("NARUC")  
9 Electric Utility Cost Allocation Manual discusses at least thirteen embedded demand  
10 allocation methods, while Dr. James Bonbright notes the existence of at least 29 demand  
11 allocation methods in his treatise Principles of Public Utility Rates.<sup>2</sup>

12  
13 **Q. BRIEFLY DISCUSS THE STRENGTHS AND WEAKNESSES OF COMMON**  
14 **GENERATION COST ALLOCATION METHODOLOGIES.**

15 A. A brief description of the most common fully allocated cost methodologies and attendant  
16 strengths and weaknesses are as follows:

17  
18 **Single Coincident Peak ("1-CP")** -- The basic concept underlying the 1-CP method is  
19 that an electric utility must have enough capacity available to meet its customers' peak  
20 coincident demand. As such, advocates of the 1-CP method reason that customers (or  
21 classes) should be responsible for fixed capacity costs based on their respective  
22 contributions to this peak system load. The major advantages to the 1-CP method are that  
23 the concepts are easy to understand, the analyses required to conduct a CCOSS are  
24 relatively simple, and the data requirements are significantly less than some of the more  
25 complex methods.

26  
27 The 1-CP method has several shortcomings, however. First, and foremost, is the fact that  
28 the 1-CP method totally ignores the capacity/energy trade-off inherent in the electric  
29 utility industry. That is, under this method, the sole criterion for assigning one hundred  
30 percent of fixed generation costs is the classes' relative contributions to load during a

---

<sup>2</sup> Principles of Public Utility Rates, Second Edition, 1988, page 495.

1 single hour of the year. This method does not consider, in any way, the extent to which  
2 customers use these facilities during the other 8,759 hours of the year. This may have  
3 severe consequences because a utility's planning decisions regarding the amount and type  
4 of generation capacity to build and install are predicated not only on the maximum  
5 system load, but also on how customers demand electricity throughout the year, i.e., load  
6 duration. To illustrate, if a utility such as NIPSCO had a peak load of 3,000 mW and its  
7 actual optimal generation mix included an assortment of coal, hydro, combined cycle and  
8 combustion turbine units, the actual total cost of installed capacity is significantly higher  
9 than if the utility only had to consider meeting 3,000 mW for 1 hour of the year. This is  
10 because the utility would install the cheapest type of plant (i.e., peaker units) if it only  
11 had to consider one hour a year.

12  
13 There are two other major shortcomings of the 1-CP method. First, the results produced  
14 with this method can be unstable from year to year. This is because the hour in which a  
15 utility peaks annually is largely a function of weather. Therefore, annual peak load  
16 depends on when severe weather occurs. If this occurs on a weekend or holiday, relative  
17 class contributions to the peak load will likely be significantly different than if the peak  
18 occurred during a weekday. Second, the other major shortcoming of the 1-CP method is  
19 often referred to as the "free ride" problem. This problem can easily be seen with a  
20 summer peaking utility that peaks about 5:00 p.m. Because street lights are not on at this  
21 time of day, this class will not be assigned any capacity costs and will, therefore, enjoy a  
22 "free ride" on the assignment of generation costs that this class requires.

23  
24 **4-CP** -- The 4-CP method is identical in concept to the 1-CP method except that the peak  
25 loads during the highest four months are utilized. This method generally exhibits the  
26 same advantages and disadvantages as the 1-CP method.

27  
28 **Summer and Winter Coincident Peak ("S/W Peak")** -- The S/W Peak method was  
29 developed because some utilities' annual peak load occurs in the summer during some  
30 years and in the winter during others. Because customers' usage and load characteristics  
31 may vary by season, the S/W Peak attempts to recognize this. This method is essentially

1 the same as the 1-CP method except that two hours of load are considered instead of one.  
2 This method has essentially the same strengths and weaknesses as the 1-CP method, and  
3 in my opinion, is no more reasonable than the 1-CP method.  
4

5 **12-CP** -- Arithmetically, the 12-CP method is essentially the same as the 1-CP method  
6 except that class contributions to each monthly peak are considered. Although the 12-CP  
7 method bears little resemblance to how utilities design and build their systems, the results  
8 produced by this method better reflect the cost incidence of a utility's generation facilities  
9 than does the 1-CP or 4-CP methods.  
10

11 Most electric utilities have distinct seasonal load patterns such that there are high system  
12 peaks during the winter and summer months, and significantly lower system peaks during  
13 the spring and autumn months. By assigning class responsibilities based on their  
14 respective contributions throughout the year, consideration is given to the fact that  
15 utilities will call on all of their resources during the highest peaks, and only use their  
16 most efficient plants during lower peak periods. Therefore, the capacity/energy trade-off  
17 is implicitly considered to some extent under this method.  
18

19 The major shortcoming of the 12-CP method is that accurate load data is required by  
20 class throughout the year. This generally requires a utility to maintain ongoing load  
21 studies. However, once a system to record class load data is in place, the administration  
22 and maintenance of such a system is not overly cumbersome for larger utilities.  
23

24 **Peak and Average ("P&A")** -- The various P&A methodologies rest on the premise that  
25 a utility's actual generation facilities are placed into service to meet peak load and serve  
26 consumers demands throughout the entire year; i.e., are planned and installed to minimize  
27 total costs (capacity and energy). Hence, the P&A method assigns capacity costs  
28 partially on the basis of contributions to peak load and partially on the basis of  
29 consumption throughout the year. Although there is not universal agreement on how  
30 peak demands should be measured or how the weighting between peak and average  
31 demands should be performed, most electric P&A studies use class contributions to

1 coincident-peak demand for the "peak" portion, and weight the peak and average loads  
2 based on the system coincident load factor, i.e., the load factor that represents the portion  
3 assigned based on consumption (average demand).  
4

5 The major strengths of the P&A method are that an attempt is made to recognize the  
6 capacity/energy trade-off in the assignment of fixed capacity costs, and that data  
7 requirements are minimal.  
8

9 Although the recognition of the capacity/energy trade-off is admittedly arbitrary under  
10 the P&A method, most other allocation methods also suffer some degree of arbitrariness.  
11 A potential weakness of the P&A method is that a significant amount of fixed capacity  
12 investment is allocated based on energy consumption, with no recognition given to lower  
13 variable fuel costs during off-peak periods. To illustrate this shortcoming, consider an  
14 off-peak or very high load factor class. This class will consume a constant amount of  
15 energy during the many cheaper off-peak periods. As such, this class will be assigned a  
16 significant amount of fixed capacity costs, while variable fuel costs will be assigned on a  
17 system average basis. This can result in an overburdening of costs if fuel costs vary  
18 significantly by hour. However, if the consumption patterns of the utility's various  
19 classes are such that there is little variation between class time differentiated fuel costs on  
20 an overall annual basis, the P&A method can produce fair and reasonable results.  
21

22 **Average and Excess ("A&E")** -- The A&E method also considers both peak demands  
23 and energy consumption throughout the year. However, the A&E method is much  
24 different than the P&A method in both concept and application. The A&E method  
25 recognizes class load diversity within a system, such that all classes do not call on the  
26 utility's resources to the same degree, at the same times. Mechanically, the A&E method  
27 weights average and excess demands based on system coincident load factor. Individual  
28 class "excess" demands represent the difference between the class non-coincident peak  
29 demand and its average annual demand. The classes' "excess" demands are then summed  
30 to determine the system excess demand. Under this method, it is important to distinguish  
31 between coincident and non-coincident demands. This is because if coincident, instead

1 of non-coincident, demands are used when calculating class excesses, the end result will  
2 be exactly the same as that achieved under the 1-CP method.

3  
4 Although the A&E method bears virtually no resemblance to how generation systems are  
5 designed, this method can produce fair and reasonable results for some utilities. This is  
6 because no class will receive a "free-ride" under this method, and because recognition is  
7 given to average consumption as well as to the additional costs imposed by not  
8 maintaining a perfectly constant load.

9  
10 A potential shortcoming of this method is that customers that only use power during off-  
11 peak periods will be overburdened with costs. Under the A&E method, off-peak  
12 customers will be assigned a higher percentage of capacity costs because their non-  
13 coincident load factor may be very low even though they call on the utility's resources  
14 only during off-peak periods. As such, unless fuel costs are time differentiated, this class  
15 will be assigned a large percentage of capacity costs and may not receive the benefits of  
16 cheaper off-peak energy costs. Another weakness of the A&E method is that extensive  
17 and accurate class load data is required.

18  
19 **Base/Intermediate/Peak ("BIP")** -- The BIP method is also known as a production  
20 stacking method, explicitly recognizes the capacity and energy tradeoff inherent with  
21 generating facilities in general, and specifically, recognizes the mix of a particular  
22 utility's resources used to serve the varying demands throughout the year. The BIP  
23 method classifies and assigns individual generating resources based on their specific  
24 purpose and role within the utility's actual portfolio of production resources and also  
25 assigns the dollar amount of investment by type of plant such that a proper weighting of  
26 investment costs between expensive base load units relative to inexpensive peaker units is  
27 recognized within the cost allocation process.

28 A major strength of the BIP method is explicit recognition of the fact that individual  
29 generating units are placed into service to meet various needs of the system. Expensive  
30 base load units, with high capacity factors run constantly throughout the year to meet the  
31 energy needs of all customers. These units operate during all periods of demand

1 including low system load as well as during peak use periods. Base load units are,  
2 therefore, classified and allocated based on their roles within the utility's portfolio of  
3 resource; i.e., energy requirements.

4  
5 At the other extreme are the utility's peaker units that are designed, built, and operated  
6 only to run a few hours of the year during peak system requirements. These peaker units  
7 serve only peak loads and are, therefore, classified and allocated on peak demand.

8  
9 Situated between the high capacity cost/low energy cost base load units and the low  
10 capacity cost/high energy cost peaker units are intermediate generating resources. These  
11 units may not be dispatched during the lowest periods of system load but, due to their  
12 relatively efficient energy costs, are operated during many hours of the year.  
13 Intermediate resources are classified and allocated based on their relative usage to peak  
14 capability ratios; i.e., their capacity factor.

15  
16 Finally, hydro units are evaluated on a case-by-case basis. This is because there are  
17 several types of hydro generating facilities including run of the river units that run most  
18 of the time with no fuel costs, and units powered by stored water in reservoirs that  
19 operate under several environmental and hydrological constraints including flood control,  
20 downstream flow requirements, management of fisheries, and watershed replenishment.  
21 Within the constraints just noted and due to their ability to store potential energy, these  
22 units are generally dispatched on a seasonal or diurnal basis to minimize short-term  
23 energy costs and also assist with peak load requirements. Pumped storage units are  
24 unique in that water is pumped up to a reservoir during off-peak hours (with low energy  
25 costs) and released during peak hours of the day. Depending on the characteristics of a  
26 unit, hydro facilities may be classified as energy-related (e.g., run of the river), peak-  
27 related (e.g., pumped storage) or a combination of energy and demand-related (traditional  
28 reservoir storage). The potential weakness of the BIP method is the same as under other  
29 methods where no recognition is given to lower variable fuel costs during off-peak  
30 periods.

1        **Probability of Dispatch** -- The Probability of Dispatch method is the most theoretically  
2 correct and most equitable method to allocate generation costs when specific data is  
3 available. Under this approach, each generation asset's (plant or unit) investment is  
4 evaluated on an hourly basis over every hour of the year. That is, each generating unit's  
5 gross investment is assigned to individual hours based upon how that individual plant is  
6 operated during each hour of the year. In this method, the investment costs associated  
7 with base load units which operate almost continuously throughout the year, are spread  
8 throughout numerous hours of the year while the investment cost associated with  
9 individual peaker units which operate only a few hours during peak periods are assigned  
10 to only a few peak hours of the year. The capacity costs for all generating units operating  
11 in a particular hour are then summed to develop the total hourly investment assigned to  
12 each hour. These hourly generating unit investments are then assigned to individual rate  
13 classes based on class contributions to system load for every hour of the year.

14  
15        As a result of such analyses, the Probability of Dispatch method properly reflects the cost  
16 causation imposed by individual classes because it reflects the actual utilization of a  
17 utility's generation resources. Put differently, the assignment of generation costs is  
18 consistent with the utility's planning process to invest in a portfolio of generation  
19 resources wherein high fixed cost/low variable cost base load generation units are  
20 assigned to classes, based on these units' output, over the majority of hours during the  
21 year (because they will, on an expected basis, be called upon to operate over the majority  
22 of hours during the year). In contrast, the investment costs associated with the low fixed  
23 cost/high variable cost peaker units are assigned to those classes in proportion over  
24 relatively fewer hours during a year (because they will, on an expected basis, be called  
25 upon to operate over fewer hours). As is evident from the above discussion, the  
26 Probability of Dispatch method requires a significant amount of data such that hourly  
27 output from each generator is required as well as detailed load studies encompassing each  
28 hour of the year (8,760 hours).

29  
30        **Equivalent Peaker ("EP")** -- The EP method combines certain aspects of traditional  
31 embedded cost methods with those used in forward-looking marginal cost studies. The

1 EP method often relies on planning information in order to classify individual generating  
2 units as energy or demand-related and considers the need for a mix of base load  
3 intermediate and peaking generation resources.

4  
5 The EP method has substantial intuitive appeal in that base load units that operate with  
6 high capacity factors are allocated largely on the basis of energy consumption with costs  
7 shared by all classes based on their usage, while peaking units that are seldom used and  
8 only called upon during peak load periods are allocated based on peak demands to those  
9 classes contributing to the system peak load. However, this method requires a significant  
10 level of assumptions regarding the current (or future) costs of various generating  
11 alternatives.

12  
13 **Q. MR. WATKINS, YOU HAVE DISCUSSED THE STRENGTHS AND**  
14 **WEAKNESSES OF THE MORE COMMON GENERATION ALLOCATION**  
15 **METHODOLOGIES. ARE ANY OF THESE METHODS CLEARLY INFERIOR**  
16 **IN YOUR VIEW?**

17 A. Yes. In my opinion, cost allocation methods that only consider peak loads (demands)  
18 such as the 1-CP, 4-CP, etc. do not reasonably reflect cost causation for electric utilities  
19 because these methods totally ignore the type and level of investments made to provide  
20 generation service. When generation cost responsibility is assigned to rate classes only  
21 on a few hours of peak demand, there is an explicit assumption that there is a direct and  
22 proportional correlation between peak load (for a few hours) and the utility's total  
23 investment in its portfolio of generation assets. Such is certainly not the case with  
24 utilities such as NIPSCO wherein the majority of generation assets are comprised of base  
25 load coal units installed to provide power throughout the year. Furthermore, the total  
26 dollar amount of generation investment for utilities such as NIPSCO that have coal  
27 generation facilities includes a substantial, if not the majority of, its net investment to  
28 comply with environmental or pollution control requirements. These environmental or  
29 pollution control investments are related to the burning of fuel, which is energy-related.  
30 Perhaps the simplest way to explain how a utility plans and builds its portfolio of  
31 generation assets and facilities is to consider the differences between capital costs and

1 operating costs of various generation alternatives. Virtually every utility, including  
2 NIPSCO, has a mix of different types of generation facilities including large base load  
3 units, intermediate plants, and small peaker units. Individual generating unit investment  
4 costs vary from a low of a few hundred dollars per kW of capacity for high operating cost  
5 (energy cost) peakers to several thousand dollars per kW for base load coal facilities with  
6 low operating costs. If a utility were only concerned with being able to meet peak load  
7 with no regard to operating costs, it would simply install inexpensive peakers. Under  
8 such an unrealistic system design, plant costs would be much lower than in reality but  
9 variable operating costs (primarily fuel costs) would be astronomical and would result in  
10 a higher overall cost to serve customers.

11  
12 Peak responsibility methods such as the 1-CP and 4-CP totally ignore the planning  
13 criteria used by utilities to minimize the total cost of providing service, do not reflect the  
14 utilization of its portfolio of generating assets throughout the year, and therefore, do not  
15 reflect in any way how capital costs are incurred; i.e., do not reflect cost causation.

16  
17 **Q. WHAT COST ALLOCATION METHODOLOGY DID DR. GASKE UTILIZE TO**  
18 **ALLOCATE GENERATION PLANT COSTS WITHIN HIS CCOSS?**

19 A. Dr. Gaske conducted CCOSS utilizing the 4-CP and 12-CP methods to allocate  
20 NIPSCO's generation assets. However, Dr. Gaske advocates only the use of the 4-CP  
21 method for purposes of this case.

22  
23 **Q. WHAT SUPPORT DOES DR. GASKE PROVIDE FOR UTILIZING THE 4-CP**  
24 **METHOD TO ALLOCATE GENERATION PLANT?**

25 A. Dr. Gaske's sole criteria for utilizing the 4-CP method to allocate generation plant is that  
26 he relied upon benchmark standards utilized by the Federal Energy Regulatory  
27 Commission ("FERC") wherein the allocation of generation or fixed production costs are  
28 at issue. It is useful to note that such benchmarks have nothing to do with NIPSCO's  
29 retail class cost of service, as virtually all the Company's purchased power costs are  
30 incurred from market-based rates and thus do not reflect rates resulting from FERC  
31 embedded cost allocations. Additionally, this Commission is not in any way wed to, or

1           encumbered by, the practices of another regulatory commission. Indeed, it is not my  
2           intention to criticize the practices that FERC chooses to use; every commission has its  
3           own expertise and discretion to use its judgment as to how to regulate rates. As an  
4           illustration, FERC treats Accumulated Deferred Income Taxes (“ADIT”) as an offset to  
5           rate base whereas this Commission is of the opinion that ADIT should be reflected within  
6           a company’s capital structure and cost of capital for ratemaking purposes. Clearly, the  
7           Indiana Utility Regulatory Commission is not bound by, nor should it be constrained to  
8           use, the practices of another regulatory commission.

9  
10       **Q.     ALTHOUGH IT IS YOUR OPINION THAT THE 4-CP METHOD DOES NOT**  
11       **REASONABLY REFLECT COST CAUSATION, DOES DR. GASKE’S 4-CP**  
12       **CCOSS RESULT IN ANY CLASS’ RECEIVING A FREE RIDE IN COST**  
13       **RESPONSIBILITY?**

14       **A.**     Yes. Dr. Gaske’s 4-CP method is based on the four highest peak hours during the  
15       months of June through September 2014. Each of these peak hours occurred during the  
16       mid-afternoon hours.<sup>3</sup> During these four hours, the Street and Area Lighting classes’  
17       demands were zero such that Dr. Gaske assigns absolutely no generation cost  
18       responsibility to these classes (Rates 650 and 655). Therefore, even though Street and  
19       Area Lighting require generation service, they are not assigned a single dollar of rate  
20       base associated with generation capacity cost.

21  
22       **Q.     HAVE YOU CONDUCTED ALTERNATIVE STUDIES THAT MORE**  
23       **ACCURATELY REPRESENT THE CAPACITY AND ENERGY TRADE-OFFS**  
24       **EXHIBITED IN NIPSCO’S GENERATION PLANT INVESTMENT?**

25       **A.**     Yes. As indicated earlier, there is no single, or absolute, correct method to allocate joint  
26       generation costs. While some methods are superior to others, it is my opinion that the  
27       results of multiple, yet reasonable, methods should be considered in evaluating class  
28       profitability as well as class revenue responsibility.

29  

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<sup>3</sup>           The peak hours utilized by Dr. Gaske are as follows: 6/30/14 @ 1600 hrs.; 7/22/14 @ 1600 hrs/; 8/25/14  
          @ 1200 hrs.; and, 9/5/14 @ 1400 hrs.

1 In my opinion, the Probability of Dispatch, BIP and P&A methods better reflect the  
2 capacity/energy tradeoffs that exist within an electric utility's generation-related costs.  
3 This is particularly true and important for NIPSCO given the fact that the preponderance  
4 of its investment in generation plant is associated with coal-fired generation facilities. As  
5 such, I have conducted alternative CCOSS utilizing each of these three allocation  
6 methodologies. Furthermore, I have also given consideration to the 12-CP method to  
7 allocate generation plant.

8  
9 **1. Probability of Dispatch Method**

10  
11 **Q. PLEASE EXPLAIN HOW YOU CONDUCTED YOUR CCOSS UTILIZING THE  
12 PROBABILITY OF DISPATCH METHOD.**

13 A. As discussed earlier, the Probability of Dispatch method is the most theoretically correct  
14 methodology to assign embedded (historical) generation plant investment. However, the  
15 data required to utilize this methodology is often not available because this approach  
16 requires detailed hourly output (production) data for each generating facility as well as  
17 hourly class loads. With regard to generation output, NIPSCO provided hourly  
18 production for each generating unit. With regard to hourly class loads, NIPSCO provided  
19 the following: total jurisdictional internal load;<sup>4</sup> actual metered loads for the Large  
20 Commercial and Industrial classes (with adjustments consistent with its rate case  
21 application); sample load data for Residential and Small/Medium Commercial classes;  
22 and, estimated loads for the Lighting classes. With this data, and notwithstanding the  
23 deficiencies and biases discussed earlier, I was able to utilize NIPSCO's approach and  
24 methodology to estimate class contributions to load for each hour of the test year. I was  
25 then able to conduct a CCOSS utilizing the Probability of Dispatch method.

26  
27 The first step in conducting the Probability of Dispatch method is to assign individual  
28 generating plant investments to specific hours. In accordance with the procedures set

---

<sup>4</sup> Internal load is defined as: jurisdictional native retail load, per OUCC-18-006.

1       forth in the NARUC: Electric Utility Cost Allocation Manual,<sup>5</sup> each plant's total gross  
2       investment was assigned pro-ratably to each hour of the year based on each respective  
3       unit's load (output) in that hour.<sup>6</sup> My Attachment GAW-2 provides a single page of these  
4       hourly assignments. It should be noted that this exercise actually assigns costs to 8,760  
5       hours; however, my Attachment GAW-2 only encompasses several of the first hours in  
6       the test year to avoid attachments exceeding 125 pages. My filed workpapers contain the  
7       details of this assignment for each and every hour of the test year.

8  
9       Once hourly investment costs are known, these costs were then assigned to individual  
10      rate classes on an hour-by-hour basis based on each class' contribution to total load  
11      during each hour. Class hourly loads were developed using the same approach and  
12      methodology as used by NIPSCO and also reflects the adjustments to various industrial  
13      loads as proposed in the Company's rate application.<sup>7</sup> Each class' relative contribution to  
14      NIPSCO's total internal load in a given hour was multiplied by that hour's total  
15      generation investment cost. The hourly class investment costs were then summed for all  
16      hours of the year to develop class responsibility for NIPSCO's generation plant.  
17      Attachment GAW-3 provides summaries of the hourly assignment of generation costs to  
18      individual rate classes. The class assignments to every hour of the test year are provided  
19      in my filed workpapers.

20  
21   **Q.   PLEASE PROVIDE A COMPARISON OF GENERATION ALLOCATION**  
22   **FACTORS UNDER DR. GASKE'S 4-CP APPROACH TO THOSE OBTAINED**  
23   **UNDER THE HOUR-BY-HOUR PROBABILITY OF DISPATCH METHOD.**

24   **A.   The following table provides a comparison of class allocation factors under the 4-CP and**  
25   **Probability of Dispatch methods:**

26  

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<sup>5</sup>       1992 Edition, page 62.

<sup>6</sup>       Individual plant (unit) gross investment is that reported in NIPSCO's 2014 FERC Form 1. Actual test year investment by unit is not available as per OUCC-9-007, Attachment C. Hourly output by unit as per OUCC-9-013 and U.S. Steel-2-037.

<sup>7</sup>       Per OUCC-9-021, OUCC-18-006, and OUCC-18-12.

Comparison of 4-CP and Probability of Dispatch  
Allocation Factors

Rate Class and Rate Code		NIPSCO 4-CP		Probability Of Dispatch
Residential	611-613	30.28%		20.93%
Comm. & Gen'l Svc. – Heat Pump	620	0.00%	a/	0.07%
General Service – Small	621	10.92%		9.13%
Commercial Spaceheating	622	0.00%	a/	0.09%
General Service – Medium	623	11.35%		9.05%
General Service – Large	624	12.69%		13.48%
Metal Melting Service	625	0.35%		0.54%
Off-Peak Service	626	4.03%		4.82%
Industrial Power Service	632	10.59%		12.91%
High Load Factor Ind. Pwr. Service	633	10.50%		15.51%
Ind. Pwr. Svc. for Air Sep. & Hydrogen Prod.	634	8.71%		12.63%
Municipal Power	641	0.13%		0.18%
Intermittent Wastewater Pumping	642	0.00%	a/	0.00% a/
Railroad Power Service	644	0.06%		0.12%
Streetlighting	650	0.00%	b/	0.16%
Traffic & Directive Lighting	655	0.03%		0.04%
Dusk to Dawn Area Lighting	660	0.00%	b/	0.07%
Interdepartmental	--	0.37%		0.28%
Total		100.00%		100.00%

a/ Actual allocation factor is slightly greater than 0.

b/ Actual allocation factor is exactly equal to 0.

**Q. PLEASE PROVIDE A SUMMARY OF THE RESULTS OBTAINED UTILIZING THE PROBABILITY OF DISPATCH METHOD.**

A. First it should be noted that the following summary and comparison utilizes all other allocations and procedures used by Dr. Gaske in conducting his 4-CP CCOSS. The following table provides an apples-to-apples comparison of Dr. Gaske's 4-CP results to those obtained utilizing the Probability of Dispatch method:

Comparison of 4-CP and Probability of Dispatch Results  
ROR @ Current Rates

Rate Class and Rate Code		NIPSCO 4-CP	Probability Of Dispatch
Residential	611-613	1.82%	4.55%
Comm. & Gen'l Svc. – Heat Pump	620	-4.99%	-8.48%
General Service – Small	621	9.14%	11.24%
Commercial Spaceheating	622	7.26%	-1.16%
General Service – Medium	623	6.00%	8.83%
General Service – Large	624	6.71%	5.97%
Metal Melting Service	625	2.60%	-1.33%
Off-Peak Service	626	6.71%	4.44%
Industrial Power Service	632	5.58%	2.90%
High Load Factor Ind. Pwr. Service	633	6.42%	1.12%
Ind. Pwr. Svc. for Air Sep. & Hydrogen Prod.	634	2.12%	-2.03%
Municipal Power	641	3.67%	1.87%
Intermittent Wastewater Pumping	642	128.14%	101.70%
Railroad Power Service	644	8.15%	3.87%
Streetlighting	650	1.44%	-1.11%
Traffic & Directive Lighting	655	15.80%	10.82%
Dusk to Dawn Area Lighting	660	-1.00%	-3.92%
Interdepartmental	--	-7.13%	-5.92%
Total		4.64%	4.64%

As can be seen in the table above, there are significant differences for some classes and minimal differences for other classes. For example, the residential rate of return (“ROR”) increases from 1.82% to 4.55%, while several of the industrial classes RORs are significantly reduced. My Probability of Dispatch CCROSS is provided in my Attachment GAW-4.

**Q. CAN YOU QUALITATIVELY EXPLAIN WHY THE PROBABILITY OF DISPATCH METHOD PRODUCES SIGNIFICANTLY DIFFERENT RESULTS FOR SOME CLASSES?**

**A.** Yes. NIPSCO’s portfolio of generating assets is overwhelmingly comprised of base load coal units that provide energy to the system throughout the year. At the same time, NIPSCO has a much smaller investment in intermediate and peaker units. The Probability of Dispatch method properly recognizes the fact that NIPSCO’s base load

1 units are much more expensive and assigns these costs based on its actual dispatch  
2 (operation) during the year. The 4-CP method does not recognize the investment or  
3 operational characteristics of NIPSCO's generation portfolio as it simply allocates the  
4 Company's total combined investment in generation plant based on four peak hours of  
5 the year. As such, the 4-CP method under-assigns generation costs to the high load factor  
6 industrial classes and over-assigns costs to the lower load factor residential class.

7  
8 **2. Base-Intermediate-Peak ("BIP") Method**

9  
10 **Q. PLEASE EXPLAIN HOW YOU CONDUCTED YOUR CCROSS UTILIZING THE**  
11 **BASE-INTERMEDIATE-PEAK METHOD.**

12 A. In order to reflect the capacity/energy trade-off inherent in NIPSCO's mix of generating  
13 resources, each plant's maximum capacity (mW) and output (mWh) during the test year  
14 is required. Attachment GAW-5 provides the classification between energy and demand  
15 for NIPSCO's generation plant under the BIP method. This method evaluates each plant  
16 based on its capacity factor and variable fuel costs to determine whether that plant  
17 operates to serve primarily energy needs throughout the year, only peak loads, or is of an  
18 intermediate type that serves both energy and peak load requirements. In developing the  
19 amount of investment that is classified as energy vs. demand-related, the investment in  
20 each fossil fuel generating plant was allocated based on its capacity factor such that the  
21 percent that is deemed energy-related is equal to the capacity factor, while the demand-  
22 related portion is one minus the capacity factor. It should be noted, however, that for  
23 each coal plant, the amount of pollution and environmental control investment is shown  
24 as a separate line item and is considered to be 100% energy-related as these facilities are  
25 required to minimize particulates and other pollutants caused by the burning of fuel  
26 throughout the year.<sup>8</sup> Furthermore, NIPSCO's minimal investment in hydro generating  
27 plants are deemed to be 100% energy-related as these are "run-of-the-river" generating  
28 plants.

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<sup>8</sup> The amount of investment in pollution and environmental control facilities is understated as the amounts shown in Attachment GAW-5 only reflect those ECR investments rolled into base rates during NIPSCO's last base rate case as provided in Exhibit 3 to Schedule 1 of ECR-17 (Cause No. 42150) plus those placed into service subsequent to NIPSCO's last base rate case per OUCC Informal Data Request 2-001 (ECR-26 excluding CWIP).

1 **Q. PLEASE PROVIDE A COMPARISON OF GENERATION ALLOCATION**  
2 **FACTORS UNDER DR. GASKE'S 4-CP APPROACH TO THOSE OBTAINED**  
3 **UNDER THE BASE-INTERMEDIATE-PEAK METHOD.**

4 A. The following table provides a comparison of class allocation factors under the 4-CP and  
5 BIP methods:

6 Comparison of 4-CP and BIP  
7 Allocation Factors

8 Rate Class and Rate Code	9	NIPSCO 10 4-CP	11 BIP
12 Residential	611-613	30.28%	24.37%
13 Comm. & Gen'l Svc. – Heat Pump	620	0.00% <u>a/</u>	0.05%
14 General Service – Small	621	10.92%	9.44%
15 Commercial Spac heating	622	0.00% <u>a/</u>	0.06%
16 General Service – Medium	623	11.35%	9.51%
17 General Service – Large	624	12.69%	12.57%
18 Metal Melting Service	625	0.35%	0.44%
19 Off-Peak Service	626	4.03%	4.61%
20 Industrial Power Service	632	10.59%	12.53%
21 High Load Factor Ind. Pwr. Service	633	10.50%	14.01%
22 Ind. Pwr. Svc. for Air Sep. & Hydrogen Prod.	634	8.71%	11.53%
23 Municipal Power	641	0.13%	0.15%
24 Intermittent Wastewater Pumping	642	0.00% <u>a/</u>	0.00% <u>a/</u>
25 Railroad Power Service	644	0.06%	0.09%
26 Streetlighting	650	0.00% <u>b/</u>	0.21%
27 Traffic & Directive Lighting	655	0.03%	0.04%
28 Dusk to Dawn Area Lighting	660	0.00% <u>b/</u>	0.05%
29 Interdepartmental	--	0.37%	0.37%
30 Total		100.00%	100.00%

31 a/ Actual allocation factor is slightly greater than 0.

b/ Actual allocation factor is exactly equal to 0.

32 **Q. PLEASE PROVIDE A SUMMARY OF THE RESULTS OBTAINED UTILIZING**  
33 **THE BIP METHOD.**

34 A. The following summary and comparison utilizes all other allocations and procedures used  
35 by Dr. Gaske in conducting his 4-CP CCOSS. The following table provides an apples-to-  
36 apples comparison of Dr. Gaske's 4-CP results to those obtained utilizing the BIP  
37 method:

Comparison of 4-CP and BIP Results  
ROR @ Current Rates

Rate Class and Rate Code	NIPSCO 4-CP	BIP
Residential 611-613	1.82%	3.43%
Comm. & Gen'l Svc. – Heat Pump 620	-4.99%	-7.54%
General Service – Small 621	9.14%	10.86%
Commercial Spaceheating 622	7.26%	0.94%
General Service – Medium 623	6.00%	8.21%
General Service – Large 624	6.71%	6.85%
Metal Melting Service 625	2.60%	0.44%
Off-Peak Service 626	6.71%	5.02%
Industrial Power Service 632	5.58%	3.29%
High Load Factor Ind. Pwr. Service 633	6.42%	2.41%
Ind. Pwr. Svc. for Air Sep. & Hydrogen Prod. 634	2.12%	-1.09%
Municipal Power 641	3.67%	2.98%
Intermittent Wastewater Pumping 642	128.14%	110.30%
Railroad Power Service 644	8.15%	5.50%
Streetlighting 650	1.44%	-1.69%
Traffic & Directive Lighting 655	15.80%	12.44%
Dusk to Dawn Area Lighting 660	-1.00%	-3.15%
Interdepartmental --	-7.13%	-7.19%
Total	4.64%	4.64%

As can be seen in the table above, there are significant differences for some classes and minimal differences for other classes. For example, the residential ROR increases from 1.82% to 3.43%, while several of the industrial classes RORs are significantly reduced. A summary of my BIP CCOSS results are provided in my Attachment GAW-6, while the details are provided in my filed workpapers.

**3. Peak & Average (“P&A”) Method**

**Q. PLEASE EXPLAIN HOW YOU CONDUCTED YOUR CCOSS UTILIZING THE P&A METHOD.**

A. I utilized NIPSCO’s test year retail load factor of 63.26% in order to weight the energy (average) portion versus the peak portion of the P&A allocator.

1 **Q. WHAT MEASURE OF PEAK DEMAND DID YOU USE FOR THE DEMAND**  
2 **PORTION OF THE P&A ALLOCATOR?**

3 A. I used Dr. Gaske's class contributions to the 1-CP demand rather than the 4-CP demand  
4 to reflect the peak nature and responsibility of class loads.<sup>9</sup> I have selected this measure  
5 of peak demand because in my opinion, the use of class contributions to 1-CP better  
6 reflect the spirit and concepts of the P&A method.

7  
8 **Q. PLEASE PROVIDE A COMPARISON OF GENERATION ALLOCATION**  
9 **FACTORS UNDER DR. GASKE'S 4-CP APPROACH TO THOSE OBTAINED**  
10 **UNDER THE P&A METHOD.**

11 A. The following table provides a comparison of class allocation factors under the 4-CP and  
12 P&A methods:

Comparison of 4-CP and P&A  
Allocation Factors

Rate Class and Rate Code	NIPSCO 4-CP	P&A
Residential 611-613	30.28%	24.15%
Comm. & Gen'l Svc. – Heat Pump 620	0.00% <u>a/</u>	0.05%
General Service – Small 621	10.92%	9.40%
Commercial Spaceheating 622	0.00% <u>a/</u>	0.06%
General Service – Medium 623	11.35%	9.46%
General Service – Large 624	12.69%	12.59%
Metal Melting Service 625	0.35%	0.45%
Off-Peak Service 626	4.03%	4.63%
Industrial Power Service 632	10.59%	12.57%
High Load Factor Ind. Pwr. Service 633	10.50%	14.13%
Ind. Pwr. Svc. for Air Sep. & Hydrogen Prod. 634	8.71%	11.61%
Municipal Power 641	0.13%	0.15%
Intermittent Wastewater Pumping 642	0.00% <u>a/</u>	0.00% <u>a/</u>
Railroad Power Service 644	0.06%	0.09%
Streetlighting 650	0.00% <u>b/</u>	0.22%
Traffic & Directive Lighting 655	0.03%	0.04%
Dusk to Dawn Area Lighting 660	0.00% <u>b/</u>	0.05%
Interdepartmental --	0.37%	0.36%
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>

a/ Actual allocation factor is slightly greater than 0.

b/ Actual allocation factor is exactly equal to 0.

<sup>9</sup> Per Gaske Workpaper 17-F.2.

1 **Q. WHAT ARE THE RESULTS OF YOUR CCOSS UTILIZING THE P&A**  
2 **METHOD TO ALLOCATE GENERATION COSTS?**

3 A. The following summary and comparison utilizes all other allocations and procedures used  
4 by Dr. Gaske in conducting his 4-CP CCOSS. The following table provides an apples-to-  
5 apples comparison of Dr. Gaske's 4-CP results to those obtained utilizing the P&A  
6 method:

7  
8 Comparison of 4-CP and P&A Results  
ROR @ Current Rates

Rate Class and Rate Code	NIPSCO 4-CP	P&A
Residential 611-613	1.82%	3.50%
Comm. & Gen'l Svc. – Heat Pump 620	-4.99%	-7.60%
General Service – Small 621	9.14%	10.91%
Commercial Spaceheating 622	7.26%	0.80%
General Service – Medium 623	6.00%	8.27%
General Service – Large 624	6.71%	6.84%
Metal Melting Service 625	2.60%	0.32%
Off-Peak Service 626	6.71%	4.95%
Industrial Power Service 632	5.58%	3.24%
High Load Factor Ind. Pwr. Service 633	6.42%	2.30%
Ind. Pwr. Svc. for Air Sep. & Hydrogen Prod. 634	2.12%	-1.16%
Municipal Power 641	3.67%	2.92%
Intermittent Wastewater Pumping 642	128.14%	109.63%
Railroad Power Service 644	8.15%	5.39%
Streetlighting 650	1.44%	-1.77%
Traffic & Directive Lighting 655	15.80%	12.31%
Dusk to Dawn Area Lighting 660	-1.00%	-3.21%
Interdepartmental --	-7.13%	-7.13%
Total	4.64%	4.64%

22  
23  
24 The P&A approach produces results very similar to those obtained under the BIP method.  
25 A summary of my P&A CCOSS results are provided in my Attachment GAW-7, while  
26 the details are provided in my filed workpapers.

1 **Q. EARLIER IN YOUR TESTIMONY YOU INDICATED THAT THE**  
2 **PROBABILITY OF DISPATCH, BIP, AND P&A METHODS MAY NOT**  
3 **PROPERLY RECOGNIZE CLASS VARIANCES IN VARIABLE PRODUCTION**  
4 **COSTS. HAVE YOU EXAMINED WHETHER THERE ARE MATERIAL**  
5 **DIFFERENCES IN CLASS FUEL/PURCHASED POWER COSTS WHEN**  
6 **ANALYZED ON AN HOURLY BASIS?**

7 A. Yes I have. As discussed earlier, NIPSCO provided each generation plant's hourly  
8 output during the test year. In addition, in response to OUCC-9-012, Confidential  
9 Attachment A, the Company provided average annual fuel costs (per mWh) for each  
10 plant. With this data, I was able to calculate hourly fuel costs by individual generating  
11 plant. Because NIPSCO also purchases a significant amount of energy from MISO,  
12 hourly purchased power costs are also reflected in my hourly analysis. Similarly, my  
13 hourly cost analysis deducts the fuel-related costs associated with Off-System Sales  
14 ("OSS") to arrive at total hourly fuel/purchased power costs. These hourly  
15 fuel/purchased power costs were then assigned to individual rate classes on an hour-by-  
16 hour basis based on class hourly loads discussed previously. The end result of this  
17 analysis yielded very similar hourly fuel costs across all classes such that all classes'  
18 fuel/purchased power costs are within  $\pm 1.5\%$  of the system average annual cost as shown  
19 below<sup>10</sup>:

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<sup>10</sup> The hourly fuel cost associated with Interdepartmental sales is within 2.30% of the system average cost. The details are provided in my filed workpapers.

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NIPSCO Class Hourly Fuel/Purchased Power Costs			
Rate Class and Rate Code		Avg. Cost Per mWh	Deviation From Sys. Average
Residential	611-613	\$30.03	1.0%
Comm. & Gen'l Svc. – Heat Pump	620	\$29.39	-1.2%
General Service – Small	621	\$30.05	1.0%
Commercial Spaceheating	622	\$29.61	-0.4%
General Service – Medium	623	\$30.11	1.3%
General Service – Large	624	\$29.86	0.4%
Metal Melting Service	625	\$29.72	-0.1%
Off-Peak Service	626	\$29.82	0.3%
Industrial Power Service	632	\$29.46	-0.9%
High Load Factor Ind. Pwr. Service	633	\$29.35	-1.3%
Ind. Pwr. Svc. for Air Sep. & Hydrogen Prod.	634	\$29.40	-1.1%
Municipal Power	641	\$30.05	1.0%
Intermittent Wastewater Pumping	642	\$29.87	0.4%
Railroad Power Service	644	\$29.42	-1.1%
Streetlighting	650	\$29.70	-0.1%
Traffic & Directive Lighting	655	\$29.87	0.4%
Dusk to Dawn Area Lighting	660	\$29.69	-0.2%
Interdepartmental	--	\$30.42	2.3%
Total System		\$29.74	--

**Q. WHAT ARE YOUR CONCLUSIONS REGARDING THE PROPER ALLOCATION OF NIPSCO'S GENERATION PLANT?**

A. The Probability of Dispatch and BIP methods are very detailed approaches that are theoretically sound and reasonably reflect the capacity/energy trade-off in generation facilities specific to NIPSCO's investment. As such, these two methods are the most "accurate" methods from a cost causation perspective. While the 12-CP and P&A methods are much simpler in their data requirements, as well as in their analytical applications, and are admittedly somewhat arbitrary, they too recognize the fact that much of NIPSCO's generation resources are utilized to meet energy requirements throughout the year. It is my opinion that each of these methods should be considered in evaluating class profitability.

1 **Q. PLEASE PROVIDE A SUMMARY OF INDEXED CLASS RATES OF RETURN**  
 2 **UNDER EACH OF THE THREE GENERATION ALLOCATION**  
 3 **METHODOLOGIES YOU RECOMMEND COMPARED TO THOSE ACHIEVED**  
 4 **UNDER THE 4-CP APPROACH.**

5 A. The following table provides indexed class rates of return at current rates under each of  
 6 my recommended cost allocation methods as well as the under the 4-CP approach  
 7 recommended by Dr. Gaske:

8  
9 Indexed Rates of Return At Current Rates

Rate Class and Rate Code	NIPSCO 4-CP	OUCC Recommended Methods					Average
		12-CP	Prob. Of Dispatch	BIP	P&A		
Residential 611-613	39%	71%	98%	74%	75%	80%	
Comm. & GS – HP 620	-108%	-187%	-183%	-163%	-164%	-174%	
GS – Small 621	197%	215%	242%	234%	235%	232%	
Comm. Spaceheating 622	157%	-44%	-25%	20%	17%	-8%	
GS – Medium 623	129%	151%	190%	177%	178%	174%	
GS – Large 624	145%	136%	129%	148%	147%	140%	
Metal Melting 625	56%	26%	-29%	10%	7%	3%	
Off-Peak 626	145%	137%	96%	108%	107%	112%	
Industrial Power 632	120%	57%	62%	71%	70%	65%	
HLF Ind. Pwr. Service 633	138%	82%	24%	52%	50%	52%	
Air Sep. & Hydrogen 634	46%	8%	-44%	-23%	-25%	-21%	
Municipal 641	79%	51%	40%	64%	63%	55%	
Intermittent WW Pumping 642	2762%	2540%	2192%	2377%	2363%	2368%	
RR Power 644	176%	108%	83%	119%	116%	107%	
Streetlighting 650	31%	-14%	-24%	-36%	-38%	-28%	
Traffic Lighting 655	341%	300%	233%	268%	265%	267%	
Dusk to Dawn Lighting 660	-22%	-52%	-85%	-68%	-69%	-68%	
Interdepartmental --	-154%	-144%	-128%	-155%	-154%	-145%	
Total	100%	100%	100%	100%	100%	100%	

26  
27 Indexed RORs reflect the relative differences in absolute rates of return to that achieved  
 28 by the system average. In other words, a class that has an indexed ROR of 100% is equal  
 29 to the absolute ROR for the total system and indexed RORs greater than 100% indicate  
 30 RORs above the system average, while indexed values less than 100% reflect RORs  
 31 below the system average. As can be seen above, there are stark differences in class

1 relative RORs under my recommended approaches to the 4-CP approach proposed by Dr.  
2 Gaske. The most apparent differences relate to: the residential class which exhibits  
3 substantially higher relative profitabilities under my recommended approaches;  
4 commercial space heating which achieves significantly lower relative profits under my  
5 recommended approaches; industrial power and industrial high load factor service which  
6 achieve much lower relative profits under my recommended approaches; and,  
7 streetlighting service which produce negative rates of return under my recommended  
8 methods as compared to low, yet positive, profits under Dr. Gaske's 4-CP approach.  
9

10 **B. Transmission Plant**

11  
12 **Q. PLEASE EXPLAIN THE THEORIES ON HOW TRANSMISSION-RELATED**  
13 **PLANT SHOULD BE ALLOCATED WITHIN AN EMBEDDED CCOSS.**

14 A. There are two general philosophies relating to the proper allocation of transmission-  
15 related plant. The first philosophy is based on the premise that transmission facilities are  
16 nothing more than an extension of generation plant in that transmission facilities simply  
17 act as a conduit to provide power and energy from distant generating facilities to a  
18 utility's load center (specific service area). That is, generation facilities are often located  
19 well away from load centers and near the resources required to operate generation  
20 facilities. For example, coal generation facilities are commonly located near water  
21 sources for steam and cooling or near coal mines and/or rail facilities. Similarly, natural  
22 gas generators must be located in close proximity to large natural gas pipelines.  
23

24 The second philosophy relates to the physical capacity of transmission lines. That is,  
25 transmission facilities have a known and measurable load capability such that customer  
26 contributions to peak load should serve as the basis for allocating these transmission  
27 costs. While there is no doubt that any given electricity conductor (i.e., a transmission  
28 line) has a physical load carrying capability, this rationale fails to recognize cost  
29 causation in three regards.  
30  
31

1 First, an allocation based simply on contributions to a few hours of peak load fails to  
2 recognize the fact that transmission facilities are indeed an extension of generation  
3 facilities and are used to move the energy produced by the generators from remote  
4 locations to where customers actually consume electricity. Second, and similar to the  
5 concept of base load units producing energy to serve customers throughout the year, a  
6 peak responsibility approach based on one or only a few hours of maximum demand fails  
7 to recognize that transmission facilities are used virtually every hour of an entire year and  
8 not just during periods of peak load. Third, any assumption that transmission costs are  
9 related to peak load implies that there is a direct and linear relationship between cost and  
10 load. In other words, one must assume that if load increases, the cost of transmission  
11 facilities increases, in a direct and linear manner. This is simply not the case since there  
12 are significant economies of scale associated with high voltage transmission lines.  
13

14 **Q. WHAT METHOD DID DR. GASKE USE TO ALLOCATE NIPSCO'S**  
15 **TRANSMISSION-RELATED COSTS?**

16 A. Dr. Gaske allocated transmission-related costs based on the 12-CP method.  
17

18 **Q. WHAT IS YOUR OPINION REGARDING DR. GASKE'S USE OF THE 12-CP**  
19 **METHOD TO ALLOCATE TRANSMISSION-RELATED COSTS?**

20 A. In my opinion, the 12-CP approach strikes a reasonable balance between the two general  
21 philosophies that were discussed above as it relates to the cost causation and allocation of  
22 transmission-related costs.  
23

24 **C. Distribution Plant**  
25

26 **Q. PLEASE EXPLAIN THE PHRASE "CLASSIFICATION OF DISTRIBUTION**  
27 **PLANT."**

28 A. It is generally recognized that there are no energy-related costs associated with  
29 distribution plant. That is, the distribution system is designed to meet localized peak  
30 demands. However, largely as a result of differences in customer densities throughout a

1 utility's service area, electric utility distribution plant sometimes is classified as partially  
2 demand-related and partially customer-related.

3  
4 **Q. WHY IS DISTRIBUTION PLANT SOMETIMES CLASSIFIED AS PARTIALLY**  
5 **CUSTOMER-RELATED AND PARTIALLY DEMAND-RELATED?**

6 A. Even though investment is made in distribution plant and equipment to meet the needs of  
7 customers at their required power levels, there may be considerable differences in both  
8 customer densities and the mix of customers throughout a utility's service area.  
9 Therefore, if one were to allocate distribution plant investment based simply on class  
10 contributions to peak demand, an inequitable allocation of these costs may result. As a  
11 hypothetical, suppose a utility serves both an urban area and a rural area. In this  
12 situation, many customers' electrical needs are served with relatively few miles of  
13 conductors, few poles, etc. in the urban area, while many more miles of conductors, more  
14 poles, etc. are required to serve the requirements of relatively few customers in the rural  
15 area. If the distribution of classes of customers (class customer mix) is relatively similar  
16 in both the rural and urban areas, there is no need to consider customer counts (number  
17 of customers) within the allocation process, because all classes use the utility's joint  
18 distribution facilities proportionately across the service area. However, if the customer  
19 mix is such that commercial and industrial customers are predominately clustered in the  
20 more densely populated urban area, while the less dense (rural) portion of the service  
21 territory consists almost entirely of residential customers, it may be unreasonable to  
22 allocate the total Company's distribution investments based solely on demand; i.e., a  
23 large investment in many miles of line is required to serve predominately residential  
24 customers in the rural area while the commercial and industrial electrical needs are met  
25 with much fewer miles of lines in the urban area. Under this circumstance, an allocation  
26 of costs based on a weighting of customers and demand can be considered equitable and  
27 appropriate.

28  
29 **Q. BEFORE YOU CONTINUE, IS NIPSCO'S DISTRIBUTION SYSTEM**  
30 **COMPRISED OF VARIOUS SUB-SYSTEMS?**

1 A. Yes. As is the case with virtually every electric utility, NIPSCO's overall distribution  
2 system is comprised of a primary voltage system and a secondary voltage system. The  
3 primary system operates at higher voltage levels than the secondary system and generally  
4 consists of plant and equipment between the substations and transformers. The lower  
5 voltage secondary system can be thought of as operating downstream from the primary  
6 system and delivers electricity to small end-users. It should be noted that some industrial  
7 customers/classes do not utilize or rely upon NIPSCO's distribution system as they take  
8 service at transmission or sub-transmission voltages.

9  
10 **Q. BRIEFLY DESCRIBE THE TYPES OF INVESTMENT (EQUIPMENT)**  
11 **UTILIZED IN NIPSCO'S DISTRIBUTION SYSTEM.**

12 A. For accounting purposes, NIPSCO's distribution plant is grouped into various accounts.  
13 These accounts include: Land and Land Rights (Account 360); Structures and  
14 Improvements (Account 361); Station Equipment (Account 362); Poles, Towers and  
15 Fixtures (Account 364); Overhead Conductors (Account 365); Underground Conduit  
16 (Account 366); Underground Conductors (Account 367); Line Transformers (Account  
17 368); Meters (Account 370); Area Lighting (Account 371) and Street Lighting (Account  
18 373).

19  
20 **Q. DID DR. GASKE MAKE *A PRIORI* ASSUMPTIONS RELATING TO THE**  
21 **CLASSIFICATION OF DISTRIBUTION PLANT?**

22 A. Yes. Dr. Gaske has classified primary distribution plant as 100% demand-related and  
23 secondary distribution plant as partially demand-related and partially customer-related.

24  
25 **Q. HAVE YOU CONDUCTED ANALYSES TO EVALUATE DR. GASKE'S *A***  
26 ***PRIORI* ASSUMPTIONS THAT PRIMARY DISTRIBUTION PLANT SHOULD**  
27 **BE CLASSIFIED AS 100% DEMAND-RELATED AND SECONDARY**  
28 **DISTRIBUTION PLANT AS PARTIALLY DEMAND-RELATED AND**  
29 **PARTIALLY CUSTOMER-RELATED?**

30 A. Yes, I have.  
31

1 **Q. PLEASE EXPLAIN.**

2 A. Through discovery, the Company provided a data base of the number of customers by  
3 rate schedule for each postal zip-code within its service area. I then evaluated the mix of  
4 total distribution customers by rate class for each postal zip-code within NIPSCO's  
5 service area. In order to evaluate whether any differences exist in the distribution of  
6 customers across various customer density areas, I calculated the number of total  
7 NIPSCO distribution customers (excluding lighting customers) per square mile for each  
8 non-Post Office Box zip-code to serve as a measure of density for relatively small  
9 geographic areas. I was then able to readily compare NIPSCO's mix of customers served  
10 through distribution facilities (primary and secondary customers combined) and delineate  
11 between sparsely populated and densely populated areas (in terms of number of NIPSCO  
12 customers). As a further refinement, I also evaluated the distribution of customers on a  
13 stratified basis. That is, for each customer group (residential, small  
14 commercial/industrial, and large commercial/industrial), I separated small geographical  
15 areas (zip codes) into four separate strata (highest to lowest customer densities). I  
16 examined each stratum (by customer group) to determine if any significant differences in  
17 customer mix occurred within each stratum.

18  
19 This analysis relates only to NIPSCO's primary voltage system since both primary and  
20 secondary voltage customers are served with the primary system. This analysis of the  
21 total distribution system by density provided a basis to determine whether: (a) utilization  
22 alone (demand) is an appropriate and fair method to allocate distribution costs; or, (b)  
23 whether a weighting of customers and utilization (demand) is appropriate in order to  
24 reasonably reflect the imposition or causation of costs.

25  
26 If there is any basis for a customer classification of distribution plant, this analysis should  
27 show a negative correlation between the residential customer mix (residential percentage  
28 of total customers) and density across NIPSCO's service area. In other words, the  
29 percentage of residential customers (by zip-code) should decline as customer density per  
30 square mile increases from the least dense areas to the most dense areas of NIPSCO's  
31 service territory. Similarly, if Dr. Gaske's *a priori* assumption is correct, one should see

1 a distinct positive correlation between non-residential customer mixes and customer  
2 densities by zip-code. A summary of the approach and data utilized for the stratification  
3 analysis is provided below:

Class	Customers Per Sq. Mile (Density)	Count Of Zip Codes	Percent of Primary & Secondary Distribution Customers <sup>11</sup>		
			Average	Number	% of Class
<b>Residential</b>					
Strata 1	Less Than 11	28	82.8%	10,624	2.7%
Strata 2	11 Min to 30 Max	28	83.5%	25,486	6.4%
Strata 3	32 Min to 215 Max	27	86.4%	140,407	35.3%
Strata 4	Greater Than 215	27	89.1%	221,010	55.6%
Total		110		397,527	100.0%
<b>Small Comm./Ind.</b>					
Strata 1	Less Than 11	28	16.8%	2,153	4.0%
Strata 2	11 Min to 30 Max	28	14.0%	4,263	7.9%
Strata 3	32 Min to 215 Max	27	13.1%	21,362	39.4%
Strata 4	Greater Than 215	27	10.7%	26,440	48.8%
Total		110		54,218	100.0%
<b>Large Comm./Ind.</b>					
Strata 1	Less Than 11	28	0.5%	59	2.8%
Strata 2	11 Min to 30 Max	28	2.5%	758	35.8%
Strata 3	32 Min to 215 Max	27	0.5%	799	37.8%
Strata 4	Greater Than 215	27	0.2%	500	23.6%
Total		110		2,116	100.0%

24 **Q. WHAT ARE YOUR FINDINGS AS A RESULT OF THIS ANALYSIS?**

25 A. NIPSCO's customers served by primary voltage facilities are dispersed in a reasonably  
26 proportional manner throughout its service area. In fact, the distribution of residential  
27 customers is somewhat greater in the more densely populated zip codes than the less  
28 densely populated zip codes, which is contrary to the hypothesis and is opposite of what  
29 would be expected if one were to accept the notion that distribution investment should be  
30 classified as partially customer-related. As important is the fact that in the less dense

<sup>11</sup> Excludes lighting.

1 areas of NIPSCO's service territory (which require more miles of distribution lines and  
2 more poles to serve fewer customers), the Company actually serves a larger percentage of  
3 small commercial/industrial customers than in the more densely populated areas within  
4 NIPSCO's service territory.

5  
6 As a result of this analysis, it cannot be said that the less populated portions of NIPSCO's  
7 service area (which require significant investment to serve few customers)  
8 disproportionately serve any one class of distribution customers from its primary voltage  
9 facilities. As such, NIPSCO's primary distribution plant and expenses should be  
10 assigned to classes based only on utilization (peak demand).

11  
12 **Q. HAVE YOU CONDUCTED A SIMILAR ANALYSIS OF NIPSCO'S**  
13 **SECONDARY VOLTAGE SYSTEM?**

14 A. No. Several of NIPSCO's commercial and industrial rate schedules serve both primary  
15 and secondary voltage customers. As such, I was unable to conduct a density analysis of  
16 customers served by secondary voltage facilities.

17  
18 **Q. WHAT ARE YOUR CONCLUSIONS AND RECOMMENDATIONS**  
19 **CONCERNING THE CLASSIFICATION OF DISTRIBUTION PLANT IN THIS**  
20 **CASE?**

21 A. I concur with Dr. Gaske that NIPSCO's primary distribution system should be classified  
22 as 100% demand-related. I have been unable to conduct a specific analysis of NIPSCO's  
23 secondary voltage system and therefore, accept Dr. Gaske's classification of secondary  
24 distribution plant.

25  
26 **Q. WHAT ARE YOUR OVERALL FINDINGS AND RECOMMENDATIONS**  
27 **CONCERNING CLASS COST ALLOCATIONS IN THIS CASE?**

28 A. Based on my examination of NIPSCO's portfolio of generating assets as well as the  
29 utilization of these assets, it is my opinion that NIPSCO's proposal to allocate generation  
30 rate base and fixed expenses based on the 4-CP method is not reflective of cost causation  
31 and is improper in this case. Instead, I have determined that the 12-CP, Probability of

1 Dispatch, Base-Intermediate-Peak, and Peak & Average methods reflect a much more  
2 accurate portrayal of cost causation. Because public utility cost allocation studies cannot  
3 be considered an exact science, I recommend that consideration be given to all four of the  
4 methods. With regard to transmission plant, I agree with Dr. Gaske that an allocation  
5 based on 12-CP demands is fair and reasonable. Finally, Dr. Gaske's classification of  
6 primary distribution plant as 100% demand-related is appropriate, and I have accepted his  
7 customer/demand split for secondary distribution plant.

8  
9 The following tables provide a summary of absolute and indexed RORs at current rates  
10 under the three methods that should be considered in this case:

Rate Class and Rate Code		Rate of Return (ROR) at Current Rates				
		OUCC Recommended Methods				
		12-CP	Prob. Of Dispatch	BIP	P&A	Average
Residential	611-613	3.30%	4.55%	3.43%	3.50%	3.70%
Comm. & GS – HP	620	-8.66%	-8.48%	-7.54%	-7.60%	-8.07%
GS – Small	621	9.97%	11.24%	10.86%	10.91%	10.75%
Comm. Spaceheating	622	-2.05%	-1.16%	0.94%	0.80%	-0.36%
GS – Medium	623	7.01%	8.83%	8.21%	8.27%	8.08%
GS – Large	624	6.30%	5.97%	6.85%	6.84%	6.49%
Metal Melting	625	1.20%	-1.33%	0.44%	0.32%	0.16%
Off-Peak	626	6.36%	4.44%	5.02%	4.95%	5.19%
Industrial Power	632	2.66%	2.90%	3.29%	3.24%	3.02%
HLF Ind. Pwr. Service	633	3.82%	1.12%	2.41%	2.30%	2.41%
Air Sep. & Hydrogen	634	0.39%	-2.03%	-1.09%	-1.16%	-0.97%
Municipal	641	2.38%	1.87%	2.98%	2.92%	2.54%
Intermittent WW Pumping	642	117.83%	101.70%	110.30%	109.63%	109.87%
RR Power	644	5.03%	3.87%	5.50%	5.39%	4.95%
Streetlighting	650	-0.66%	-1.11%	-1.69%	-1.77%	-1.31%
Traffic Lighting	655	13.94%	10.82%	12.44%	12.31%	12.38%
Dusk to Dawn Lighting	660	-2.41%	-3.92%	-3.15%	-3.21%	-3.17%
Interdepartmental	--	-6.69%	-5.92%	-7.19%	-7.13%	-6.73%
Total		4.64%	4.64%	4.64%	4.64%	4.64%

Indexed Rate of Return (ROR) at Current Rates

Rate Class and Rate Code	OUCC Recommended Methods				
	12-CP	Prob. Of Dispatch	BIP	P&A	Average
Residential 611-613	71%	98%	74%	75%	80%
Comm. & GS – HP 620	-187%	-183%	-163%	-164%	-174%
GS – Small 621	215%	242%	234%	235%	232%
Comm. Spaceheating 622	-44%	-25%	20%	17%	-8%
GS – Medium 623	151%	190%	177%	178%	174%
GS – Large 624	136%	129%	148%	147%	140%
Metal Melting 625	26%	-29%	10%	7%	3%
Off-Peak 626	137%	96%	108%	107%	112%
Industrial Power 632	57%	62%	71%	70%	65%
HLF Ind. Pwr. Service 633	82%	24%	52%	50%	52%
Air Sep. & Hydrogen 634	8%	-44%	-23%	-25%	-21%
Municipal 641	51%	40%	64%	63%	55%
Intermittent WW Pumping 642	2540%	2192%	2377%	2363%	2368%
RR Power 644	108%	83%	119%	116%	107%
Streetlighting 650	-14%	-24%	-36%	-38%	-28%
Traffic Lighting 655	300%	233%	268%	265%	267%
Dusk to Dawn Lighting 660	-52%	-85%	-68%	-69%	-68%
Interdepartmental --	-144%	-128%	-155%	-154%	-145%
Total	100%	100%	100%	100%	100%

**IV. CLASS REVENUE DISTRIBUTION**

**Q. WHAT ARE THE GENERAL CRITERIA THAT SHOULD BE CONSIDERED IN ESTABLISHING CLASS REVENUE RESPONSIBILITY FOR ELECTRIC UTILITY RATES?**

A. There are several criteria that should be considered in evaluating class or rate revenue responsibility. First, class cost allocation results should be considered, but as discussed in detail earlier in my testimony, CCROSS results are not surgically precise. They should only be used as a guide and as one of many tools in evaluating class revenue responsibility. Other criteria that should be considered include: gradualism, wherein rates should not drastically change instantaneously; rate stability, which is similar in concept to gradualism but relates to specific rate elements within a given rate structure;

1 affordability of electricity across various classes as well as a relative comparison of  
2 electricity prices across classes; and, public policy concerning current economic  
3 conditions as well as economic development.  
4

5 Because embedded class cost allocations cannot be considered surgically precise and the  
6 fact that other criteria to be considered in evaluating class revenue responsibility are  
7 clearly subjective in nature, proper class revenue distribution can be deemed more of an  
8 art than a science. In this regard, there is no universal mathematical methodology that  
9 can be applied across all utilities or across all rate classes. However, most experts and  
10 regulatory commissions agree on certain broad parameters regarding class revenue  
11 increases. These include: some movement towards allocated cost of service; and,  
12 maximum/minimum percentage changes across individual rate classes.  
13

14 **Q. DOES NIPSCO WITNESS GASKE CLAIM TO HAVE CONSIDERED AND**  
15 **REFLECTED THE VARIOUS SUBJECTIVE CRITERIA AS WELL AS THE**  
16 **BROAD PARAMETERS DISCUSSED ABOVE WITHIN HIS CLASS REVENUE**  
17 **DISTRIBUTION PROPOSAL?**

18 A. Yes. Although Dr. Gaske utilized a mathematical approach to develop his proposed class  
19 revenue increases, he indicates in his testimony, his primary considerations were to: (1)  
20 propose a gradual approach to remove current class subsidies as measured by his class  
21 cost allocation study; (2) constrain class increases to no more than approximately 1.5  
22 times the system average rate increase (with the exception of eliminating the under-  
23 earnings associated with the interdepartmental class); and, (3) require all classes to  
24 receive an increase of at least one percent.  
25

26 **Q. PLEASE PROVIDE A SUMMARY OF THE COMPANY'S PROPOSED CLASS**  
27 **REVENUE INCREASE.**

28 A. The following table provides a summary of current and proposed class revenue increases:  
29  
30  
31

Current and NIPSCO Proposed Revenues<sup>12</sup>

Rate Class and Rate Code	Actual Revenue Incl. Riders	NIPSCO Proposed Increase Including Riders	
		Amount	Percent
Residential 611-613	\$433,840,509	\$54,303,286	12.52%
Comm. & GS – HP 620	\$838,466	\$108,124	12.90%
GS – Small 621	\$205,612,924	\$16,904,054	8.22%
Comm. Spaceheating 622	\$1,276,134	\$91,583	7.18%
GS – Medium 623	\$166,602,223	\$15,523,581	9.32%
GS – Large 624	\$209,249,933	\$17,144,199	8.19%
Metal Melting 625	\$6,422,934	\$546,994	8.52%
Off-Peak 626	\$71,595,733	\$5,331,515	7.45%
Industrial Power 632	\$151,342,967	\$9,301,968	6.15%
HLF Ind. Pwr. Service 633	\$188,158,466	\$6,136,283	3.26%
Air Sep. & Hydrogen 634	\$117,677,349	\$17,701,684	15.04%
Municipal 641	\$3,151,305	\$347,117	11.02%
Intermittent WW Pumping 642	\$120,372	\$1,217	1.01%
RR Power 644	\$2,042,981	\$167,443	8.20%
Streetlighting 650	\$8,674,398	\$653,037	7.53%
Traffic Lighting 655	\$904,981	\$43,132	4.77%
Dusk to Dawn Lighting 660	\$2,215,773	\$212,410	9.59%
Interdepartmental --	\$2,699,701	\$3,035,830	112.45%
<b>Total</b>	<b>\$1,572,427,045</b>	<b>\$147,553,456</b>	<b>9.38%</b>
Other Revenue (Allocated)	\$36,819,653	--	--
<b>Total Revenue</b>	<b>\$1,609,246,698</b>	<b>\$147,553,456</b>	<b>9.17%</b>

**Q. DOES DR. GASKE'S PROPOSED CLASS REVENUE DISTRIBUTION COMPORT WITH EACH OF THE CRITERIA HE CLAIMED TO HAVE CONSIDERED?**

**A.** No. I strongly disagree with Dr. Gaske's recommendation to rely upon the 4-CP method to allocate generation plant and fixed expenses in this case. Furthermore, his proposed class revenue increases do not comport with his gradual approach to remove current class

<sup>12</sup> A comparison of NIPSCO's proposed rate increases with and without consideration of the interruptible credit offset is provided in my Attachment GAW-8.

1 subsidies as measured by his class cost allocation study. To illustrate, consider Dr.  
2 Gaske's own calculations of class rates of return at current and his proposed rates.

3 Comparison of Gaske Calculated Class Rates of Return  
4 and Proposed Revenue Increases

Rate Class and Rate Code	ROR		Revenue % Increase
	Current	Proposed	
Residential 611-613	1.82%	4.04%	12.52%
Comm. & GS – HP 620	-4.99%	-2.64%	12.90%
GS – Small 621	9.14%	11.25%	8.22%
Comm. Spaceheating 622	7.26%	9.40%	7.18%
GS – Medium 623	6.00%	8.16%	9.32%
GS – Large 624	6.71%	8.86%	8.19%
Metal Melting 625	2.60%	4.82%	8.52%
Off-Peak 626	6.71%	8.86%	7.45%
Industrial Power 632	5.58%	7.06%	6.15%
HLF Ind. Pwr. Service 633	6.42%	7.27%	3.26%
Air Sep. & Hydrogen 634	2.12%	6.18%	15.04%
Municipal 641	3.67%	5.88%	11.02%
Intermittent WW Pumping 642	128.14%	132.12%	1.01%
RR Power 644	8.15%	10.27%	8.20%
Streetlighting 650	1.44%	3.68%	7.53%
Traffic Lighting 655	15.80%	17.79%	4.77%
Dusk to Dawn Lighting 660	-1.00%	1.28%	9.59%
Interdepartmental --	-7.13%	6.82%	112.45%
Total	4.64%	6.82%	9.38%

21 Consider the following: the GS-Small (Rate 621) class is currently producing a rate of  
22 return in excess of NIPSCO's proposed rate of return (9.14% compared to 6.82%). Dr.  
23 Gaske proposes an 8.22% increase to this class. At the same time, consider Industrial  
24 Power (Rate 632). This class is currently achieving an ROR of 5.58%, which is below  
25 NIPSCO's proposed overall ROR of 6.82%, yet, Dr. Gaske proposes a much smaller  
26 percentage increase to this class of 6.15%. Similar inconsistencies can be seen with Rate  
27 622 as having a larger percentage increase than industrial classes with lower RORs such  
28 as Rate Schedule 633; i.e., Dr. Gaske proposes a 7.18% to Rate 622, while he only  
29 produces a 3.26% increase for Rate 633 even though the industrial rate schedule is  
30 producing a lower ROR at current rates.

1 **Q. GIVEN THE INCONSISTENCIES YOU HAVE IDENTIFIED ABOVE, IS DR.**  
2 **GASKE'S PROPOSED CLASS REVENUE INCREASE DISTRIBUTION FAIR**  
3 **AND REASONABLE?**

4 A. No. The foundation of Dr. Gaske's proposed class revenue increases is his 4-CP cost  
5 allocation study. As explained in detail earlier in my testimony, Dr. Gaske's CCOSS  
6 does not reflect a reasonable assignment of costs nor does it reasonably move classes  
7 gradually toward equal rates of return.

8  
9 **Q. DO YOU RECOMMEND AN ALTERNATIVE CLASS REVENUE**  
10 **DISTRIBUTION?**

11 A. Yes. In order to provide an apples-to-apples comparison to Dr. Gaske's recommended  
12 class increase, I have developed a class revenue distribution utilizing NIPSCO's proposed  
13 overall increase of \$147.553 million, which includes NIPSCO's proposed riders.

14  
15 In developing my proposed class revenue distribution, I have considered the results of my  
16 four recommended class cost of service studies<sup>13</sup> and required that all classes move closer  
17 to rate parity, considered gradualism, limited all class increases (except NIPSCO's  
18 interdepartmental rate) to no more than 1.5 times the system-wide average percentage  
19 increase, and required that all classes receive at least half of the system-wide average  
20 percentage increase. The table below provides the results of my recommended class  
21 revenue distribution:

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23  
24  
25  
26  
27  
28  
29  
30

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<sup>13</sup> 12-CP, Probability of Dispatch, BIP, and P&A.

OUCC Proposed Class Revenue Increases  
At NIPSCO Overall Requested Increase

Rate Class and Rate Code	Pct. of Sys. Avg. % Increase	Increase		OUCC Average Indexed ROR <sup>14</sup>	
		%	\$	Current	OUCC Proposed
Residential 611-613	121%	11.36%	\$49,273,246	80%	88%
Comm. & GS – HP 620	150%	14.08%	\$118,020	-174%	-93%
GS – Small 621	50%	4.69%	\$9,647,156	232%	175%
Comm. Spaceheating 622	150%	14.08%	\$179,625	-8%	33%
GS – Medium 623	50%	4.69%	\$7,816,812	174%	133%
GS – Large 624	50%	4.69%	\$9,817,801	140%	111%
Metal Melting 625	150%	14.08%	\$904,073	3%	52%
Off-Peak 626	100%	9.38%	\$6,718,403	112%	114%
Industrial Power 632	125%	11.73%	\$17,752,157	65%	85%
HLF Ind. Pwr. Service 633	135%	12.67%	\$23,836,167	52%	89%
Air Sep. & Hydrogen 634	150%	14.08%	\$16,563,915	-21%	31%
Municipal 641	125%	11.73%	\$369,640	55%	70%
Intermittent WW Pumping 642	50%	4.69%	\$5,648	2368%	1724%
RR Power 644	100%	9.38%	\$191,709	107%	103%
Streetlighting 650	150%	14.08%	\$1,220,983	-28%	33%
Traffic Lighting 655	50%	4.69%	\$42,456	267%	206%
Dusk to Dawn Lighting 660	150%	14.08%	\$311,886	-68%	-4%
Interdepartmental --	--	103.11%	\$2,783,759	-145%	101%
<b>Total</b>	<b>100%</b>	<b>9.38%</b>	<b>\$147,553,456</b>	<b>100%</b>	<b>100%</b>

As can be seen above, with the gradualism constraints I have utilized, all classes move closer to cost of service wherein the class increases are limited to at least 50%, but no more than 150% of the system-wide average percentage increase. It should be noted that in order to satisfy the overall revenue increase of \$147.553 million, the residential class has been treated as a residual. The details supporting my proposed class revenue increases are provided in my filed workpapers.

<sup>14</sup> Average of 12-CP, Probability of Dispatch, Base-Intermediate-Peak and Peak & Average methods.

1 **Q. IN THE EVENT THE COMMISSION AUTHORIZES AN OVERALL REVENUE**  
2 **INCREASE LESS THAN THE \$147.553 MILLION REQUESTED BY NIPSCO,**  
3 **HOW SHOULD THE ULTIMATE INCREASE BE DISTRIBUTED ACROSS**  
4 **RATE SCHEDULES?**

5 A. I recommend that any overall increase be distributed to rate classes in proportion to the  
6 class increases I propose above.

7

8 **V. RATE DESIGN**

9

10 **Residential and Small Commercial Customer Charges**

11

12 **Q. DOES NIPSCO PROPOSE SIGNIFICANT INCREASES TO FIXED MONTHLY**  
13 **CUSTOMER CHARGES?**

14 A. Yes. NIPSCO proposes to increase the residential customer charge from \$11.00 to  
15 \$20.00 per month, or by 82%. Similarly, the Company proposes to increase the small  
16 commercial customer charges (Rates 620, 621, and 622) from \$20.00 to \$30.00 per  
17 month, or by 50%.

18

19 **Q. HOW DOES NIPSCO SUPPORT ITS EXCEPTIONALLY LARGE INCREASES**  
20 **TO FIXED MONTHLY CUSTOMER CHARGES?**

21 A. Company witness Frank Shambo states on page 35 of his direct testimony that his rate  
22 design objectives reflect an improvement of: (a) fixed cost recovery through fixed  
23 charges; (b) recovery of costs from the customers that cause the costs; and, (c) the proper  
24 alignment of pricing signals and incentives. Mr. Shambo then states that NIPSCO's  
25 proposed rate design improves this alignment. Furthermore, Mr. Shambo indicates on  
26 page 36 of his direct testimony that Dr. Gaske's calculated customer cost alone supports a  
27 residential monthly charge of \$22.51, while the full fixed cost recovery supports a  
28 monthly customer charge of \$83.95.

29

30

31

1 **Q. ARE NIPSCO'S PROPOSED 82% AND 50% INCREASES TO RESIDENTIAL**  
2 **AND SMALL COMMERCIAL CUSTOMER CHARGES REASONABLE OR IN**  
3 **THE PUBLIC INTEREST?**

4 A. No. NIPSCO's objective to collect a large percentage of its sunk investment costs (aka  
5 fixed costs) through fixed charges as well as its attendant proposed increases to such  
6 charges, violate the regulatory principle of gradualism, violate the economic theory of  
7 efficient competitive pricing, and are contrary to effective conservation efforts.

8  
9 **Q. DOES NIPSCO'S PROPOSAL TO COLLECT A SUBSTANTIAL PORTION OF**  
10 **RESIDENTIAL BASE RATE REVENUE FROM FIXED MONTHLY CHARGES**  
11 **COMPORT WITH THE ECONOMIC THEORY OF COMPETITIVE MARKETS**  
12 **OR THE ACTUAL PRACTICES OF SUCH COMPETITIVE MARKETS?**

13 A. No. The most basic tenet of competition is that prices determined through a competitive  
14 market ensure the most efficient allocation of society's resources. Because public  
15 utilities are generally afforded monopoly status under the belief that resources are better  
16 utilized without duplicating the fixed facilities required to serve consumers, a  
17 fundamental goal of regulatory policy is that regulation should serve as a surrogate for  
18 competition to the greatest extent practical.<sup>15</sup> As such, the pricing policy for a regulated  
19 public utility should mirror those of competitive firms to the greatest extent practical.

20  
21 **Q. PLEASE BRIEFLY DISCUSS HOW PRICES ARE GENERALLY STRUCTURED**  
22 **IN COMPETITIVE MARKETS.**

23 A. Under economic theory, efficient price signals result when prices are equal to marginal  
24 costs.<sup>16</sup> It is well known that costs are variable in the long-run. Therefore, efficient  
25 pricing results from the incremental variability of costs even though a firm's short-run  
26 cost structure may include a high level of sunk or "fixed" costs or be reflective of excess  
27 capacity. Indeed, competitive market-based prices are generally structured based on  
28 usage; i.e. volume-based pricing. As an example, a colleague of mine often uses the

---

<sup>15</sup> James C. Bonbright, et al., *Principles of Public Utility Rates*, p. 141 (Second Edition, 1988).

<sup>16</sup> Strictly speaking, efficiency is achieved only when there is no excess capacity such that short-run marginal costs equal long-run marginal costs. In practice, there is usually at least some excess capacity present such that pricing based on long-run marginal costs represents the most efficient utilization of resources.

1 following analogy: an oil refinery costs well over a billion dollars to build such that its  
2 cost structure is largely comprised of sunk, or fixed, costs. However, these costs are  
3 recovered one gallon at a time.  
4

5 **Q. PLEASE BRIEFLY EXPLAIN THE ECONOMIC PRINCIPLES OF EFFICIENT**  
6 **PRICE THEORY AND HOW SHORT-RUN FIXED COSTS ARE RECOVERED**  
7 **UNDER SUCH EFFICIENT PRICING.**

8 A. Perhaps the best known micro-economic principle is that in competitive markets (i.e.,  
9 markets in which no monopoly power or excessive profits exist) prices are equal to  
10 marginal cost. Marginal cost is equal to the incremental change in cost resulting from an  
11 incremental change in output. A full discussion of the calculus involved in determining  
12 marginal costs is not appropriate here. However, it is readily apparent that because  
13 marginal costs measure the changes in costs with output, short-run "fixed" costs are  
14 irrelevant in efficient pricing. This is not to say that efficient pricing does not allow for  
15 the recovery of short-run fixed costs. Rather, they are reflected within a firm's  
16 production function such that no excess capacity exists and that an increase in output will  
17 require an increase in costs -- including those considered "fixed" from an accounting  
18 perspective. As such, under efficient pricing principles, marginal costs capture the  
19 variability of costs, and prices are variable because prices equal these costs.  
20

21 **Q. PLEASE EXPLAIN HOW EFFICIENT PRICING PRINCIPLES ARE APPLIED**  
22 **TO THE ELECTRIC UTILITY INDUSTRY.**

23 A. Universally, utility marginal cost studies include three separate categories of marginal  
24 costs: demand, energy, and customer. Consistent with the general concept of marginal  
25 costs, each of these costs vary with incremental changes. Marginal demand costs  
26 measure the incremental change in costs resulting from an incremental change in peak  
27 load (demand). Marginal energy costs measure the incremental change in costs resulting  
28 from an incremental change in kWh (energy) consumption. Marginal customer costs  
29 measure the incremental change in costs resulting from an incremental change in number  
30 of customers.  
31

1 Particularly relevant here is understanding what costs are included within, and the  
2 procedures used to determine, marginal customer costs. Since marginal customer costs  
3 reflect the measurement of how costs vary with the number of customers, they only  
4 include those costs that directly vary as a result of adding a new customer. Therefore,  
5 marginal customer costs only reflect costs such as service lines, meters, and incremental  
6 billing and accounting costs.

7  
8 **Q. PLEASE EXPLAIN HOW THIS THEORY OF COMPETITIVE PRICING**  
9 **SHOULD BE APPLIED TO REGULATED PUBLIC UTILITIES, SUCH AS**  
10 **NIPSCO.**

11 A. Due to NIPSCO's investment in system infrastructure, there is no debate that many of its  
12 short-run costs are fixed in nature. However, as discussed above, efficient competitive  
13 prices are established based on long-run costs, which are entirely variable in nature.

14  
15 Marginal cost pricing only relates to efficiency. This pricing does not attempt to address  
16 fairness or equity. Fair and equitable pricing of a regulated monopoly's products and  
17 services should reflect the benefits received for the goods or services. In this regard,  
18 those that receive more benefits should pay more in total than those who receive fewer  
19 benefits. Regarding electricity usage, the level of kWh consumption is the best and most  
20 direct indicator of benefits received. Thus, volumetric pricing promotes the fairest  
21 pricing mechanism to customers and to the utility.

22  
23 The above philosophy has consistently been the belief of economists, regulators, and  
24 policy makers for generations. For example, consider utility industry pricing in the  
25 1800s, when the industry was in its infancy. Customers paid a fixed monthly fee and  
26 consumed as much of the utility commodity/service as they desired (usually water). It  
27 soon became apparent that this fixed monthly fee rate schedule was inefficient and unfair.  
28 Utilities soon began metering their commodity/service and charging only for the amount  
29 actually consumed. In this way, consumers receiving more benefits from the utility paid  
30 more, in total, for the utility service because they used more of the commodity.

31

1 **Q. IS THE ELECTRIC UTILITY INDUSTRY UNIQUE IN ITS COST**  
2 **STRUCTURES, WHICH ARE COMPRISED LARGELY OF FIXED COSTS IN**  
3 **THE SHORT-RUN?**

4 A. No. Most manufacturing and transportation industries are comprised of cost structures  
5 predominated with "fixed" costs. These fixed costs are primarily comprised of  
6 investments in plant and equipment and are also known as "sunk" costs. Indeed, virtually  
7 every capital intensive industry is faced with a high percentage of so-called fixed costs in  
8 the short-run. Prices for competitive products and services in these capital-intensive  
9 industries are invariably established on a volumetric basis, including those that were once  
10 regulated, e.g., motor transportation, airline travel, and rail service.

11  
12 Accordingly, NIPSCO's position that its fixed costs should be recovered through fixed  
13 monthly charges is incorrect. Pricing should reflect the Company's long-run costs,  
14 wherein all costs are variable or volumetric in nature, and users requiring more of the  
15 Company's products and services should pay more than customers who use less of these  
16 products and services. Stated more simply, those customers who conserve or are  
17 otherwise more energy efficient, or those who use less of the commodity for any reason,  
18 pay less than those who use more electricity.

19  
20 **Q. HOW ARE HIGH FIXED CUSTOMER CHARGE RATE STRUCTURES**  
21 **CONTRARY TO EFFECTIVE CONSERVATION EFFORTS?**

22 A. High fixed charge rate structures actually promote additional consumption because a  
23 consumer's price of incremental consumption is less than what an efficient price structure  
24 would otherwise be. A clear example of this principle is exhibited in the natural gas  
25 transmission pipeline industry. As discussed in its well-known Order 636, the FERC's  
26 adoption of a "Straight Fixed Variable" ("SFV") pricing method<sup>17</sup> was a result of national  
27 policy (primarily that of Congress) to encourage increased use of domestic natural gas by  
28 promoting additional interruptible (and incremental firm) gas usage. The FERC's SFV  
29 pricing mechanism greatly reduced the price of incremental (additional) natural gas

---

<sup>17</sup> Under Straight Fixed Variable pricing, customers pay a fixed charge that is designed to recover all of the utility's fixed costs.

1 consumption. This resulted in significantly increasing the demand for, and use of, natural  
2 gas in the United States after Order 636 was issued in 1992.

3  
4 FERC Order 636 had two primary goals. The first goal was to enhance gas competition  
5 at the wellhead by completely unbundling the merchant and transportation functions of  
6 pipelines.<sup>18</sup> The second goal was to encourage the increased consumption of natural gas  
7 in the United States. In the introductory statement of the Order, FERC stated:

8 The Commission's intent is to further facilitate the unimpeded operation of  
9 market forces to stimulate the production of natural gas... [and thereby]  
10 contribute to reducing our Nation's dependence upon imported oil...<sup>19</sup>  
11

12 With specific regard to the SFV rate design adopted in Order 636, FERC stated:

13 Moreover, the Commission's adoption of SFV should maximize pipeline  
14 throughput over time by allowing gas to compete with alternate fuels on a  
15 timely basis as the prices of alternate fuels change. The Commission believes it  
16 is beyond doubt that it is in the national interest to promote the use of clean and  
17 abundant gas over alternate fuels such as foreign oil. SFV is the best method  
18 for doing that.<sup>20</sup>  
19

20 Recently, some public utilities have begun to advocate SFV residential pricing. The  
21 companies claim a need for enhanced fixed charge revenues. To support their claim, the  
22 companies argue that because retail rates have been historically volumetric based, there  
23 has been a disincentive for utilities to promote conservation, or encourage reduced  
24 consumption. However, the FERC's objective in adopting SFV pricing suggests the  
25 exact opposite. The price signal that results from SFV pricing is meant to promote  
26 additional consumption, not reduce consumption. Thus, a rate structure that is heavily  
27 based on a fixed monthly customer charge sends an even stronger price signal to  
28 consumers to use more energy.

29  
30 **Q. ARE CONSERVATION AND EFFICIENCY GAINS A NEW RISK TO PUBLIC**  
31 **UTILITIES?**

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<sup>18</sup> Federal Energy Regulatory Commission, Docket Nos. RM91-11-001 and RM87-34-065, Order No. 636 (Apr. 9, 1992), p. 7.

<sup>19</sup> *Id.* p. 8 (alteration in original).

<sup>20</sup> *Id.* pp. 128-129.

1 A. No. Conservation through efficiency gains has been ongoing for many years and is not a  
2 new risk. As a result, even though average residential electric usage per appliance has  
3 been declining, utilities have remained financially healthy and have continued their  
4 investments under volumetric pricing structures. Also, FERC's movement to straight  
5 fixed variable pricing for pipelines was unquestionably initiated to promote additional  
6 demand for natural gas, not less, and did in fact do so.

7  
8 **Q. AS A PUBLIC POLICY MATTER, WHAT IS THE MOST EFFECTIVE TOOL**  
9 **THAT REGULATORS HAVE TO PROMOTE COST EFFECTIVE**  
10 **CONSERVATION AND THE EFFICIENT UTILIZATION OF RESOURCES?**

11 A. Unquestionably, one of the most important and effective tools that this, or any, regulatory  
12 Commission has to promote conservation is by developing rates that send proper pricing  
13 signals to conserve and utilize resources efficiently. A pricing structure that is largely  
14 fixed, such that customers' effective prices do not properly vary with consumption,  
15 promotes the inefficient utilization of resources. Pricing structures that are weighted  
16 heavily on fixed charges are much more inferior from a conservation and efficiency  
17 standpoint than pricing structures that require consumers to incur more cost with  
18 additional consumption.

19  
20 **Q. A CUSTOMER'S TOTAL ELECTRIC BILL IS COMPRISED OF A BASE RATE**  
21 **COMPONENT, A FUEL ADJUSTMENT CLAUSE ("FAC") RIDER; AND**  
22 **VARIOUS OTHER RIDERS. THESE FUEL AND OTHER RIDERS ARE**  
23 **VOLUMETRICALLY PRICED AND REPRESENT A SIGNIFICANT PORTION**  
24 **OF A CUSTOMER'S BILL. DOES THE VOLUMETRIC PRICING OF THESE**  
25 **COMPONENTS ELIMINATE THE NEED FOR A PROPER PRICING SIGNAL**  
26 **FROM BASE RATES?**

27 A. No, certainly not. The fact that significant revenue may be collected volumetrically  
28 through trackers does not lessen the need for reasonable design of the underlying base  
29 rates.

1 **Q. NOTWITHSTANDING THE EFFICIENCY REASONS AS TO WHY**  
2 **REGULATION SHOULD SERVE AS A SURROGATE FOR COMPETITION,**  
3 **ARE THERE OTHER RELEVANT ASPECTS TO THE PRICING STRUCTURES**  
4 **IN COMPETITIVE MARKETS *VIS A VIS* THOSE OF REGULATED**  
5 **UTILITIES?**

6 A. Yes. In competitive markets, consumers, by definition, have the ability to choose various  
7 suppliers of goods and services. Consumers and the market have a clear preference for  
8 volumetric pricing. Utility customers are not so fortunate in that the local utility is a  
9 monopoly. The only reason utilities are able to seek pricing structures with high fixed  
10 monthly charges is due to their monopoly status. In my opinion, this is a critical  
11 consideration in establishing utility pricing structures. Competitive markets and  
12 consumers in the United States have demanded volumetric based prices for generations.  
13 Hence, a regulated utility's pricing structure should not be allowed to counter the  
14 collective wisdom of markets and consumers simply because of its market power.

15  
16 **Q. HAVE YOU CONDUCTED ANY STUDIES OR ANALYSES TO INDICATE THE**  
17 **LEVELS AT WHICH NIPSCO'S RESIDENTIAL AND SMALL COMMERCIAL**  
18 **CUSTOMER CHARGES SHOULD BE ESTABLISHED?**

19 A. Yes. In designing public utility rates, there is a method that produces maximum fixed  
20 monthly customer charges and is consistent with efficient pricing theory and practice.  
21 This technique considers only those costs that vary as a result of connecting a new  
22 customer and which are required in order to maintain a customer's account. This  
23 technique is a direct customer cost analysis and uses a traditional revenue requirement  
24 approach. Under this method, capital cost provisions include an equity return, interest,  
25 income taxes, and depreciation expense associated with the investment in service lines  
26 and meters. In addition, operating and maintenance provisions are included for customer  
27 metering, records, and billing.

28  
29 Under this direct customer cost approach, there is no provision for corporate overhead  
30 expenses or any other indirect costs as these costs are more appropriately recovered  
31 through energy (kWh) charges.

1 **Q. HAVE YOU CONDUCTED DIRECT CUSTOMER COST ANALYSES**  
2 **APPLICABLE TO NIPSCO'S RESIDENTIAL AND SMALL COMMERCIAL**  
3 **CLASSES?**

4 A. Yes. I conducted a direct customer cost analysis of NIPSCO's residential and small  
5 commercial classes. The details of this analysis are provided in my Attachment GAW-9.  
6 As indicated in this Attachment, the residential direct customer cost is at most \$5.52 per  
7 month, while the small commercial direct customer cost is \$11.17 per month. It should  
8 be noted that my customer cost analyses is based on the Company's proposed return on  
9 equity of 10.75%. If a lower cost of equity is used, the resulting customer costs are  
10 somewhat reduced.

11  
12 **Q. WHY IS IT APPROPRIATE TO EXCLUDE CORPORATE OVERHEAD AND**  
13 **OTHER INDIRECT COSTS IN DEVELOPING RESIDENTIAL CUSTOMER**  
14 **CHARGES?**

15 A. Like all electric utilities, NIPSCO is in the business of providing electricity to meet the  
16 energy needs of its customers. Because of this and the fact that customers do not  
17 subscribe to NIPSCO's services simply to be "connected," overhead and indirect costs  
18 are most appropriately recovered through volumetric energy charges.

19  
20 **Q. DR. GASKE INDICATES ON PAGE 48 OF HIS DIRECT TESTIMONY THAT**  
21 **FOR THE RESIDENTIAL CLASS THE COST-BASED CUSTOMER CHARGE**  
22 **WOULD BE APPROXIMATELY \$83.00, AND FOR THE SMALL GENERAL**  
23 **SERVICE CUSTOMERS THE CHARGE WOULD BE APPROXIMATELY**  
24 **\$218.00. PLEASE EXPLAIN HOW DR. GASKE ARRIVED AT THESE LEVELS.**

25 A. Dr. Gaske's monthly amount of approximately \$83 (\$83.95) per residential customer and  
26 approximately \$218 (\$218.18) per small commercial customer includes virtually all of  
27 the Company's allocated fixed costs. In other words, in addition to the direct costs  
28 required to connect and maintain a customer's account, Dr. Gaske has included all  
29 demand-related costs including the fixed costs associated with generation plant,  
30 transmission plant, and distribution plant. Moreover, Dr. Gaske's referenced amounts  
31 reflect the vast preponderance of general plant and other overhead expenses such as

1 general and administrative expenses. In other words, Dr. Gaske would collect virtually  
2 all of the non-fuel revenue requirement through fixed monthly customer charges.

3  
4 **Q. HOW MUCH OF THE NON-FUEL RESIDENTIAL AND SMALL**  
5 **COMMERCIAL REVENUE REQUIREMENT IS INCLUDED WITHIN DR.**  
6 **GASKE'S "CUSTOMER COSTS?"**

7 A. In his Attachment 17-C, page 19, Dr. Gaske has allocated \$530.671 million in total costs  
8 (including required return) to the residential class. Of this amount, \$107.346 million are  
9 fuel-related expenses. Therefore, Dr. Gaske's allocated non-fuel residential revenue  
10 requirement is \$423.325 million (\$530.671 minus \$107.346). Dr. Gaske calculates a  
11 residential customer cost of \$83.95 per month and when multiplied by the number of  
12 residential customer bills, a \$413.467 million "customer cost" revenue requirement is  
13 obtained. As such, Dr. Gaske's calculated customer cost represents 97.7% of the total  
14 residential non-fuel revenue requirement. Similarly, Dr. Gaske's calculated small  
15 commercial "customer cost" of \$218.18 reflects 96.9% of this class' total non-fuel  
16 revenue requirement. As discussed earlier in my testimony regarding the proper pricing  
17 of customer costs, Dr. Gaske's analyses is nothing more than an attempt to recover all  
18 non-variable costs from fixed monthly customer charges.

19  
20 **Q. BASED ON YOUR OVERALL EXPERIENCE AS WELL AS THE STUDIES AND**  
21 **ANALYSES YOU HAVE CONDUCTED FOR THIS CASE, WHAT IS YOUR**  
22 **RECOMMENDATION REGARDING THE APPROPRIATE CUSTOMER**  
23 **CHARGES FOR NIPSCO'S RESIDENTIAL AND SMALL COMMERCIAL**  
24 **CUSTOMERS?**

25 A. Even though my direct customer cost analyses indicates that significant reductions to  
26 current fixed monthly customer charges applicable to residential and small commercial  
27 customers are appropriate, in the interest of rate continuity, gradualism, and impacts on  
28 individual customer bills, I recommend that the current monthly customer charge of  
29 \$11.00 for residential and \$20.00 for small commercial (Rates 620, 621, and 622) be  
30 maintained at their current level.

31

1 **Q. PLEASE BRIEFLY SUMMARIZE WHY YOUR RECOMMENDATION TO**  
2 **MAINTAIN THE CURRENT LEVEL OF CUSTOMER CHARGES IS**  
3 **APPROPRIATE.**

4 A. It must be remembered that my proposed rate design will allow the Company a  
5 reasonable opportunity to recover all of its costs and earn a fair rate of return. Utility's  
6 advocate higher fixed customer charges in order to minimize their risks by guaranteeing  
7 revenue recovery through fixed charges. Whether electricity rates are largely volumetric  
8 priced or largely based on fixed charges, the reality is that the utility will collect its  
9 required revenues. This is particularly relevant in this case since the Company has  
10 adjusted actual test year energy usages (kWh) for normal weather. Rate designs  
11 structured largely based on volumetric charges promote conservation, are efficient, and  
12 are in accordance with pricing practices in competitive markets.

13  
14 Finally, no cross-subsidization issues are created across customers within the same class  
15 as long as the fixed customer charge recovers the incremental cost of connecting and  
16 maintaining each customer's account. Indeed, the incremental cost of connecting and  
17 maintaining a residential customer's account is under \$6.00 per month. My  
18 recommendations to maintain the current customer charge of \$11.00 for residential  
19 customers and \$20.00 for small commercial customers is considerably higher than this  
20 incremental cost.

21  
22 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

23 A. Yes.

BACKGROUND & EXPERIENCE PROFILE  
**GLENN A. WATKINS**  
VICE PRESIDENT/SENIOR ECONOMIST  
TECHNICAL ASSOCIATES, INC.

**EDUCATION**

1982 - 1988	M.B.A., Virginia Commonwealth University, Richmond, Virginia
1980 - 1982	B.S., Economics; Virginia Commonwealth University
1976 - 1980	A.A., Economics; Richard Bland College of The College of William and Mary, Petersburg, Virginia

**POSITIONS**

Mar. 1993-Present	Vice President/Senior Economist, Technical Associates, Inc. (Mar. 1993-June 1995 Traded as C. W. Amos of Virginia)
Apr. 1990-Mar. 1993	Principal/Senior Economist, Technical Associates, Inc.
Aug. 1987-Apr. 1990	Staff Economist, Technical Associates, Inc., Richmond, Virginia
Feb. 1987-Aug. 1987	Economist, Old Dominion Electric Cooperative, Richmond, Virginia
May 1984-Jan. 1987	Staff Economist, Technical Associates, Inc.
May 1982-May 1984	Economic Analyst, Technical Associates, Inc.
Sep. 1980-May 1982	Research Assistant, Technical Associates, Inc.

**EXPERIENCE**

**I. Public Utility Regulation**

- A. Costing Studies -- Conducted, and presented as expert testimony, numerous embedded and marginal cost of service studies. Cost studies have been conducted for electric, gas, telecommunications, water, and wastewater utilities. Analyses and issues have included the evaluation and development of alternative cost allocation methods with particular emphasis on ratemaking implications of distribution plant classification and capacity cost allocation methodologies. Distribution plant classifications have been conducted using the minimum system and zero-intercept methods. Capacity cost allocations have been evaluated using virtually every recognized method of allocating demand related costs (e.g., single and multiple coincident peaks, non-coincident peaks, probability of loss of load, average and excess, and peak and average).

Embedded and marginal cost studies have been analyzed with respect to the seasonal and diurnal distribution of system energy and demand costs, as well as cost effective approaches to incorporating energy and demand losses for rate design purposes. Economic dispatch models have been evaluated to determine long range capacity requirements as well as system marginal energy costs for ratemaking purposes.

- B. Rate Design Studies -- Analyzed, designed and provided expert testimony relating to rate structures for all retail rate classes, employing embedded and marginal cost studies. These rate structures have included flat rates, declining block rates, inverted block rates, hours use of demand blocking, lighting rates, and interruptible rates. Economic development and special industrial rates have been developed in recognition of the competitive environment for specific customers. Assessed alternative time differentiated rates with diurnal and seasonal pricing structures. Applied Ramsey (Inverse Elasticity) Pricing to marginal costs in order to adjust for embedded revenue requirement constraints.

**GLENN A. WATKINS**

- C. Forecasting and System Profile Studies -- Development of long range energy (Kwh or Mcf) and demand forecasts for rural electric cooperatives and investor owned utilities. Analysis of electric plant operating characteristics for the determination of the most efficient dispatch of generating units on a system-wide basis. Factors analyzed include system load requirements, unit generating capacities, planned and unplanned outages, marginal energy costs, long term purchased capacity and energy costs, and short term power interchange agreements.
- D. Cost of Capital Studies -- Analyzed and provided expert testimony on the costs of capital and proper capital structures for ratemaking purposes, for electric, gas, telephone, water, and wastewater utilities. Costs of capital have been applied to both actual and hypothetical capital structures. Cost of equity studies have employed comparable earnings, DCF, and CAPM analyses. Econometric analyses of adjustments required to electric utilities cost of equity due to the reduced risks of completing and placing new nuclear generating units into service.
- E. Accounting Studies -- Performed and provided expert testimony for numerous accounting studies relating to revenue requirements and cost of service. Assignments have included original cost studies, cost of reproduction new studies, depreciation studies, lead-lag studies, Weather normalization studies, merger and acquisition issues and other rate base and operating income adjustments.

**II. Transportation Regulation**

- A. Oil and Products Pipelines -- Conducted cost of service studies utilizing embedded costs, I.C.C. Valuation, and trended original cost. Development of computer models for cost of service studies utilizing the "Williams" (FERC 154-B) methodology. Performed alternative tariff designs, and dismantlement and restoration studies.
- B. Railroads -- Analyses of costing studies using both embedded and marginal cost methodologies. Analyses of market dominance and cross-subsidization, including the implementation of differential pricing and inverse elasticity for various railroad commodities. Analyses of capital and operation costs required to operate "stand alone" railroads. Conducted cost of capital and revenue adequacy studies of railroads.

**III. Insurance Studies**

Conducted and presented expert testimony relating to market structure, performance, and profitability by line and sub-line of business within specific geographic areas, e.g. by state. These studies have included the determination of rates of return on Statutory Surplus and GAAP Equity by line - by state using the NAIC methodology, and comparison of individual insurance company performance vis a vis industry Country-Wide performance.

Conducted and presented expert testimony relating to rate regulation of workers compensation, automobile, and professional malpractice insurance. These studies have included the determination of a proper profit and contingency factor utilizing an internal rate of return methodology, the development of a fair investment income rate, capital structure, cost of capital.

Other insurance studies have included testimony before the Virginia Legislature regarding proper regulatory structure of Credit Life and P&C insurance; the effects on competition and prices resulting from proposed insurance company mergers, maximum and minimum expense multiplier limits, determination of specific class code rate increase limits (swing limits); and investigation of the reasonableness of NCCI=s administrative assigned risk plan and pool expenses.

**GLENN A. WATKINS**

**IV. Anti-Trust and Commercial Business Damage Litigation**

Analyses of alleged claims of attempts to monopolize, predatory pricing, unfair trade practices and economic losses. Assignments have involved definitions of relevant market areas (geographic and product) and performance of that market, the pricing and cost allocation practices of manufacturers, and the economic performance of manufacturers' distributors.

Performed and provided expert testimony relating to market impacts involving automobile and truck dealerships, incremental profitability, the present value of damages, diminution in value of business, market and dealer performance, future sales potential, optimal inventory levels, fair allocation of products, financial performance; and business valuations.

**MEMBERSHIPS AND CERTIFICATIONS**

Member, Association of Energy Engineers (1998)  
Certified Rate of Return Analyst, Society of Utility and Regulatory Financial Analysts (1992)  
Member, American Water Works Association  
National Association of Business Economists  
Richmond Association of Business Economists  
National Economics Honor Society

**NORTHERN INDIANA PUBLIC SERVICE COMPANY**  
**Probability of Dispatch**  
**Hourly Assignment of Gross Plant**

Total Gross Plant	\$ 636,190,256	\$ 440,808,400	\$ 2,496,839,265	\$ 132,510,458	\$ 40,327,014	\$ 8,481,784	\$ 10,712,692	\$ 21,567,260	\$ 3,787,437,129
Time Period	Combined Bailey 7 & 8	Mich. City 12	Combined Schahfer 14, 15, 17, 18	Sugar Creek SUGRCK	Combined Schahfer 16A, 16B	Bailey 10	Hydro NORWAY	Hydro OAKDALE	Total Investment Allocated on Period
4/1/2014	\$ -	\$ 54,591	\$ 188,883	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 243,474
4/1/2014 1:00	\$ -	\$ 54,661	\$ 156,560	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 211,220
4/1/2014 2:00	\$ -	\$ 54,661	\$ 145,317	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 199,977
4/1/2014 3:00	\$ -	\$ 54,591	\$ 145,317	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 199,907
4/1/2014 4:00	\$ -	\$ 54,731	\$ 152,906	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 207,636
4/1/2014 5:00	\$ -	\$ 56,691	\$ 175,111	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 231,801
4/1/2014 6:00	\$ -	\$ 57,530	\$ 211,510	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 269,040
4/1/2014 7:00	\$ -	\$ 57,530	\$ 218,396	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 275,927
4/1/2014 8:00	\$ -	\$ 58,020	\$ 221,769	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 279,790
4/1/2014 9:00	\$ -	\$ 58,020	\$ 249,455	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 307,476
4/1/2014 10:00	\$ -	\$ 55,851	\$ 267,866	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 323,717
4/1/2014 11:00	\$ -	\$ 57,810	\$ 267,023	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 324,833
4/1/2014 12:00	\$ -	\$ 57,670	\$ 269,271	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 326,942
4/1/2014 13:00	\$ -	\$ 57,880	\$ 269,974	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 327,854
4/1/2014 14:00	\$ -	\$ 57,810	\$ 270,396	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 328,206
4/1/2014 15:00	\$ -	\$ 57,810	\$ 270,396	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 328,206
4/1/2014 16:00	\$ -	\$ 57,600	\$ 271,239	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 328,839
4/1/2014 17:00	\$ -	\$ 57,810	\$ 272,082	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 329,892
4/1/2014 18:00	\$ -	\$ 57,810	\$ 271,801	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 329,611
4/1/2014 19:00	\$ -	\$ 57,390	\$ 271,942	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 329,332
4/1/2014 20:00	\$ -	\$ 57,670	\$ 272,363	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 330,033
4/1/2014 21:00	\$ -	\$ 57,670	\$ 272,363	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 330,033
4/1/2014 22:00	\$ -	\$ 57,600	\$ 266,601	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 324,201
4/1/2014 23:00	\$ -	\$ 57,740	\$ 250,861	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 308,601
4/2/2014	\$ -	\$ 54,731	\$ 237,931	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 292,662
4/2/2014 1:00	\$ -	\$ 54,661	\$ 238,353	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 293,014
4/2/2014 2:00	\$ -	\$ 54,731	\$ 235,683	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 290,414
4/2/2014 3:00	\$ -	\$ 54,801	\$ 259,574	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 314,375
4/2/2014 4:00	\$ -	\$ 57,250	\$ 291,617	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 348,867
4/2/2014 5:00	\$ -	\$ 57,810	\$ 318,460	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 376,270
4/2/2014 6:00	\$ -	\$ 57,880	\$ 338,416	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 396,296
4/2/2014 7:00	\$ -	\$ 57,670	\$ 354,016	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 411,686
4/2/2014 8:00	\$ -	\$ 60,750	\$ 373,129	\$ -	\$ -	\$ -	\$ 1,051	\$ 2,542	\$ 437,472
4/2/2014 9:00	\$ -	\$ 63,129	\$ 380,999	\$ -	\$ -	\$ -	\$ 2,345	\$ 6,018	\$ 452,492
4/2/2014 10:00	\$ -	\$ 63,129	\$ 380,578	\$ -	\$ -	\$ -	\$ 2,349	\$ 6,018	\$ 452,074
4/2/2014 11:00	\$ -	\$ 60,260	\$ 380,015	\$ -	\$ -	\$ -	\$ 1,864	\$ 6,205	\$ 448,344
4/2/2014 12:00	\$ -	\$ 57,950	\$ 379,313	\$ -	\$ -	\$ -	\$ 1,418	\$ 6,391	\$ 445,072
4/2/2014 13:00	\$ -	\$ 57,950	\$ 379,594	\$ -	\$ -	\$ -	\$ 1,422	\$ 6,429	\$ 445,395
4/2/2014 14:00	\$ -	\$ 58,020	\$ 379,313	\$ -	\$ -	\$ -	\$ 1,422	\$ 6,391	\$ 445,146
4/2/2014 15:00	\$ -	\$ 58,020	\$ 380,156	\$ -	\$ -	\$ -	\$ 1,943	\$ 6,429	\$ 446,548
4/2/2014 16:00	\$ -	\$ 58,020	\$ 380,437	\$ -	\$ -	\$ -	\$ 2,222	\$ 6,391	\$ 447,070
4/2/2014 17:00	\$ -	\$ 57,950	\$ 380,437	\$ -	\$ -	\$ -	\$ 2,349	\$ 6,391	\$ 447,128
4/2/2014 18:00	\$ -	\$ 57,530	\$ 381,983	\$ -	\$ -	\$ -	\$ 2,292	\$ 6,429	\$ 448,234
4/2/2014 19:00	\$ -	\$ 57,670	\$ 382,264	\$ -	\$ -	\$ -	\$ 2,146	\$ 5,943	\$ 448,024
4/2/2014 20:00	\$ -	\$ 58,090	\$ 382,264	\$ -	\$ -	\$ -	\$ 1,846	\$ 5,868	\$ 448,068
4/2/2014 21:00	\$ -	\$ 57,880	\$ 369,897	\$ -	\$ -	\$ -	\$ 2,124	\$ 5,569	\$ 435,471
4/2/2014 22:00	\$ -	\$ 56,271	\$ 342,351	\$ -	\$ -	\$ -	\$ 2,120	\$ 5,607	\$ 406,348
4/2/2014 23:00	\$ -	\$ 55,851	\$ 301,033	\$ -	\$ -	\$ -	\$ 2,124	\$ 4,747	\$ 363,755
4/3/2014	\$ -	\$ 54,381	\$ 236,947	\$ -	\$ -	\$ -	\$ 2,120	\$ 4,672	\$ 298,120
4/3/2014 1:00	\$ -	\$ 54,381	\$ 219,661	\$ -	\$ -	\$ -	\$ 2,120	\$ 4,597	\$ 280,759
4/3/2014 2:00	\$ -	\$ 54,381	\$ 205,889	\$ -	\$ -	\$ -	\$ 2,120	\$ 4,597	\$ 256,987
4/3/2014 3:00	\$ -	\$ 54,451	\$ 204,343	\$ -	\$ -	\$ -	\$ 2,120	\$ 4,597	\$ 265,511
4/3/2014 4:00	\$ -	\$ 54,801	\$ 220,223	\$ -	\$ -	\$ -	\$ 2,120	\$ 4,597	\$ 281,741
4/3/2014 5:00	\$ -	\$ 57,040	\$ 243,974	\$ -	\$ -	\$ -	\$ 2,120	\$ 5,270	\$ 308,405
4/3/2014 6:00	\$ -	\$ 57,600	\$ 265,055	\$ -	\$ -	\$ -	\$ 2,120	\$ 6,317	\$ 331,092
4/3/2014 7:00	\$ -	\$ 57,740	\$ 282,622	\$ -	\$ -	\$ -	\$ 2,120	\$ 4,747	\$ 347,229
4/3/2014 8:00	\$ -	\$ 57,670	\$ 312,838	\$ -	\$ -	\$ -	\$ 786	\$ -	\$ 371,295
4/3/2014 9:00	\$ -	\$ 57,810	\$ 327,735	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 385,546
4/3/2014 10:00	\$ -	\$ 57,740	\$ 348,675	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 406,416
4/3/2014 11:00	\$ -	\$ 58,090	\$ 365,540	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 423,630
4/3/2014 12:00	\$ -	\$ 58,020	\$ 372,286	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 430,306
4/3/2014 13:00	\$ -	\$ 57,740	\$ 376,783	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 434,523
4/3/2014 14:00	\$ -	\$ 57,810	\$ 379,734	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 437,545
4/3/2014 15:00	\$ -	\$ 57,670	\$ 384,091	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 441,761
4/3/2014 16:00	\$ -	\$ 57,390	\$ 384,934	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 442,325
4/3/2014 17:00	\$ -	\$ 57,600	\$ 385,075	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 442,675
4/3/2014 18:00	\$ -	\$ 57,810	\$ 385,356	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 443,166
4/3/2014 19:00	\$ -	\$ 57,740	\$ 366,945	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 424,686
4/3/2014 20:00	\$ -	\$ 57,670	\$ 351,065	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 408,735

**NORTHERN INDIANA PUBLIC SERVICE COMPANY**  
**Probability of Dispatch**  
**Class Assignment of Gross Plant**

Rate Schedule	Allocated Generation Plant Cost	Allocation Factor
Residential (611,612,613)	\$ 792,619,516	20.9276%
620	\$ 2,706,127	0.0715%
621	\$ 345,608,422	9.1251%
622	\$ 3,280,099	0.0866%
623	\$ 342,679,862	9.0478%
624	\$ 510,667,342	13.4832%
641	\$ 6,753,544	0.1783%
625	\$ 20,389,675	0.5384%
626	\$ 182,672,662	4.8231%
632	\$ 488,771,674	12.9051%
633	\$ 587,265,068	15.5056%
634	\$ 478,503,162	12.6340%
644	\$ 4,410,722	0.1165%
650	\$ 6,192,108	0.1635%
660	\$ 2,777,308	0.0733%
655	\$ 1,631,021	0.0431%
642	\$ 71,686	0.0019%
Interdepartmental	\$ 10,437,131	0.2756%
<b>TOTAL</b>	<b>\$ 3,787,437,129</b>	<b>100.0000%</b>

NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch  
Class Assignment of Gross Plant

Generation Plant	DATE	HOUR	Rate Schedule																				642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124	1125	1126	1127	1128	1129	1130	1131	1132	1133	1134	1135	1136	1137	1138	1139	1140	1141	1142	1143	1144	1145	1146	1147	1148	1149	1150	1151	1152	1153	1154	1155	1156	1157	1158	1159	1160	1161	1162	1163	1164	1165	1166	1167	1168	1169	1170	1171	1172	1173	1174	1175	1176	1177	1178	1179	1180	1181	1182	1183	1184	1185	1186	1187	1188	1189	1190	1191	1192	1193	1194	1195	1196	1197	1198	1199	1200	1201	1202	1203	1204	1205	1206	1207	1208	1209	1210	1211	1212	1213	1214	1215	1216	1217	1218	1219	1220	1221	1222	1223	1224	1225	1226	1227	1228	1229	1230	1231	1232	1233	1234	1235	1236	1237	1238	1239	1240	1241	1242	1243	1244	1245	1246	1247	1248	1249	1250	1251	1252	1253	1254	1255	1256	1257	1258	1259	1260	1261	1262	1263	1264	1265	1266	1267	1268	1269	1270	1271	1272	1273	1274	1275	1276	1277	1278	1279	1280	1281	1282	1283	1284	1285	1286	1287	1288	1289	1290	1291	1292	1293	1294	1295	1296	1297	1298	1299	1300	1301	1302	1303	1304	1305	1306	1307	1308	1309	1310	1311	1312	1313	1314	1315	1316	1317	1318	1319	1320	1321	1322	1323	1324	1325	1326	1327	1328	1329	1330	1331	1332	1333	1334	1335	1336	1337	1338	1339	1340	1341	1342	1343	1344	1345	1346	1347	1348	1349	1350	1351	1352	1353	1354	1355	1356	1357	1358	1359	1360	1361	1362	1363	1364	1365	1366	1367	1368	1369	1370	1371	1372	1373	1374	1375	1376	1377	1378	1379	1380	1381	1382	1383	1384	1385	1386	1387	1388	1389	1390	1391	1392	1393	1394	1395	1396	1397	1398	1399	1400	1401	1402	1403	1404	1405	1406	1407	1408	1409	1410	1411	1412	1413	1414	1415	1416	1417	1418	1419	1420	1421	1422	1423	1424	1425	1426	1427	1428	1429	1430	1431	1432	1433	1434	1435	1436	1437	1438	1439	1440	1441	1442	1443	1444	1445	1446	1447	1448	1449	1450	1451	1452	1453	1454	1455	1456	1457	1458	1459	1460	1461	1462	1463	1464	1465	1466	1467	1468	1469	1470	1471	1472	1473	1474	1475	1476	1477	1478	1479	1480	1481	1482	1483	1484	1485	1486	1487	1488	1489	1490	1491	1492	1493	1494	1495	1496	1497	1498	1499	1500	1501	1502	1503	1504	1505	1506	1507	1508	1509	1510	1511	1512	1513	1514	1515	1516	1517	1518	1519	1520	1521	1522	1523	1524	1525	1526	1527	1528	1529	1530	1531	1532	1533	1534	1535	1536	1537	1538	1539	1540	1541	1542	1543	1544	1545	1546	1547	1548	1549	1550	1551	1552	1553	1554	1555	1556	1557	1558	1559	1560	1561	1562	1563	1564	1565	1566	1567	1568	1569	1570	1571	1572	1573	1574	1575	1576	1577	1578	1579	1580	1581	1582	1583	1584	1585	1586	1587	1588	1589	1590	1591	1592	1593	1594	1595	1596	1597	1598	1599	1600	1601	1602	1603	1604	1605	1606
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NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Default Corridors  
Summary of Results

System	Total	Residential	Commercial	SH	Medium	GS	LG	Mailing	Off-Peak	Ind. Pwr. Serv.	HLF ind. Pwr. Serv.	Air Separation	Man. Power	Int. Pumping	RR	Street Lighting	Traffic Lighting	Dusk-to-Dawn	
Rate 711	Rate 712	Rate 713	Rate 714	Rate 715	Rate 716	Rate 717	Rate 718	Rate 719	Rate 720	Rate 721	Rate 722	Rate 723	Rate 724	Rate 725	Rate 726	Rate 727	Rate 728	Rate 729	
Rate Base	\$1,159,666,032	\$2,218,989,789	\$7,862,478	\$802,959,468	\$8,266,471	\$686,812,863	\$871,758,668	\$3,415,129	\$29,215,624	\$695,639,324	\$797,949,418	\$642,649,418	\$115,937,737	\$115,937,737	\$10,850,398	\$54,989,406	\$3,569,644	\$16,412,204	
Plant in Service	\$4,108,898,701	\$1,280,945,534	\$4,057,018	\$4,649,764,714	\$4,553,177	\$3,868,101,446	\$4,991,964,783	\$1,818,117	\$1,666,535,180	\$999,695,304	\$4,649,764,714	\$7,116,268	\$10,333,218	\$10,333,218	\$66,375	\$5,313,421	\$2,910,785	\$11,099,787	
Accumulated Reserve	\$386,879,093	\$566,821	\$50,651	\$3,867,587	\$14,259,483	\$1,388,832	\$4,259,827	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832	\$1,388,832
Other Rate Base Items	\$1,062,464,182	\$3,874,054	\$396,120,754	\$4,139,653	\$32,578,984	\$423,547,374	\$16,085,054	\$41,159,324	\$31,773,270	\$79,033,841	\$30,077,733	\$5,226,457	\$56,000	\$56,000	\$3,999,396	\$1,477,486	\$3,602,738	\$10,024,246	
Total Rate Base	\$1,062,464,182	\$3,874,054	\$396,120,754	\$4,139,653	\$32,578,984	\$423,547,374	\$16,085,054	\$41,159,324	\$31,773,270	\$79,033,841	\$30,077,733	\$5,226,457	\$56,000	\$56,000	\$3,999,396	\$1,477,486	\$3,602,738	\$10,024,246	
Revenue at Current Rates	\$1,040,570,271	\$328,158,677	\$483,239	\$1,619,711,578	\$895,374	\$720,558,691	\$1,411,094,718	\$3,477,445	\$46,652,103	\$78,898,355	\$101,455,425	\$46,514,575	\$2,278,584	\$101,063	\$1,076,671	\$6,894,548	\$699,575	\$1,789,575	
Retail Sales - Non Fuel	\$205,688,832	\$318,227	\$48,841,247	\$493,764	\$493,764	\$68,213,715	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860	\$2,975,860
Residential - C&G	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622	\$331,865,622
Total Retail Sales Revenue	\$1,271,247,046	\$430,024,509	\$308,561,294	\$1,276,134	\$1,682,602,223	\$209,249,933	\$4,422,334	\$7,159,733	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467
Off System Sales - Fuel	\$9,821,383	\$8,954,912	\$1,937,151	\$13,997	\$2,606,477	\$63,960	\$43,254,017	\$1,937,151	\$804,039	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151
Other Revenue	\$2,245,928	\$1,492,732	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206
Off System Sales - Non Fuel	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330	\$4,741,330
Total Other Revenue (To be Credited)	\$26,987,318	\$10,492,638	\$1,937,151	\$1,937	\$2,606,477	\$63,960	\$43,254,017	\$1,937,151	\$804,039	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151	\$1,937,151
Indirect ROR @ OUC Proposed Rates	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Revenues	\$1,069,246,698	\$837,140	\$106,201,404	\$1,276,134	\$1,682,602,223	\$209,249,933	\$4,422,334	\$7,159,733	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467
Expenses at Current Rates	\$906,235,373	\$164,629,408	\$694,878	\$53,305,181	\$646,008	\$4,090,408	\$59,741,940	\$2,313,986	\$20,625,831	\$48,817,095	\$56,291,352	\$46,540,076	\$1,187,723	\$1,187,723	\$10,345	\$84,631	\$4,679,743	\$246,652	
Operations & Maintenance Expense	\$229,516,541	\$64,536,783	\$234,473	\$24,798,382	\$262,811	\$1,127,248	\$13,151,102	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248	\$1,127,248
Depreciation Expense	\$99,270,280	\$24,778	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278	\$2,278
Amortization Expense	\$66,277,209	\$107,346,418	\$38,960	\$46,426,854	\$79,782	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945
Taxes Other Than Income Taxes	\$81,888,843	\$107,346,418	\$38,960	\$46,426,854	\$79,782	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945
Rate Expenses	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304
Off System Sales - Fuel	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304
Non-Fuel Tradable Fuel Expenses	\$66,673,222	\$180,159	\$272,680	\$24,866,327	\$87,108	\$15,515,132	\$13,100,380	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095
Income Taxes	\$1,469,745,177	\$87,141,147	\$1,153,894	\$1,619,711,578	\$1,311,509	\$3,721,513	\$12,370,380	\$6,551,700	\$64,696,540	\$17,224,684	\$18,000,869	\$13,239,433	\$65,352	\$65,352	\$1,433,184	\$9,007,979	\$745,992	\$2,520,877	
Total Expenses - Current	\$1,069,246,698	\$837,140	\$106,201,404	\$1,276,134	\$1,682,602,223	\$209,249,933	\$4,422,334	\$7,159,733	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	\$13,142,467	
Current Operating Income	\$189,501,521	\$48,348,299	\$32,826,324	\$48,348,299	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739	\$29,249,739
Return at Current Rates	4.6%	4.53%	4.43%	4.24%	4.16%	4.03%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%	3.97%
Index Rate of Return	100.00%	98%	183%	242%	25%	190%	12%	-2%	-2%	96%	62%	-4%	40%	210%	83%	24%	23%	-8%	-12%
OUC Proposed Rates	\$1,809,246,698	\$483,488,445	\$874,140	\$1,065,201,404	\$1,262,993	\$1,656,660	\$2,077,631,118	\$6,337,891	\$70,976,676	\$116,833,378	\$145,241,657	\$133,053,541	\$3,142,893	\$3,142,893	\$22,064	\$206,517	\$8,797,505	\$295,824	
Total Current Revenue (Excl. Riders & Incl. Other Rev.)	\$1,809,246,698	\$483,488,445	\$874,140	\$1,065,201,404	\$1,262,993	\$1,656,660	\$2,077,631,118	\$6,337,891	\$70,976,676	\$116,833,378	\$145,241,657	\$133,053,541	\$3,142,893	\$3,142,893	\$22,064	\$206,517	\$8,797,505	\$295,824	
OUC Proposed Total Expense	\$1,289,553,456	\$49,273,242	\$1,140,221	\$1,399,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869
Less: NIPSCO Proposed Riders	\$20,865,838	\$6,337,623	\$44	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869	\$2,393,899	\$3,869
Revenue @ Proposed Rates	\$1,788,384,316	\$476,405,089	\$849,216	\$1,062,805,605	\$1,442,189	\$1,710,360,350	\$214,806,995	\$7,169,094	\$76,502,777	\$112,437,544	\$141,801,491	\$130,669,647	\$3,142,893	\$3,142,893	\$22,064	\$206,517	\$8,797,505	\$295,824	
Index Rate of Return	98%	98%	183%	242%	25%	190%	12%	-2%	-2%	96%	62%	-4%	40%	210%	83%	24%	23%	-8%	-12%
Less:	\$96,235,373	\$164,629,408	\$694,878	\$39,305,181	\$46,008	\$4,090,408	\$59,741,940	\$2,313,986	\$20,625,831	\$48,817,095	\$56,291,352	\$46,540,076	\$1,187,723	\$1,187,723	\$10,345	\$84,631	\$4,679,743	\$246,652	
Depreciation	\$29,516,541	\$8,954,912	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206	\$2,206
Amortization	\$66,277,209	\$107,346,418	\$38,960	\$46,426,854	\$79,782	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945
Taxes Other Than Income @ Current Rates	\$81,888,843	\$107,346,418	\$38,960	\$46,426,854	\$79,782	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945	\$6,995,945
Off System Sales - Fuel	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304	\$14,678,304
Non-Fuel Tradable Fuel Expenses	\$66,673,222	\$180,159	\$272,680	\$24,866,327	\$87,108	\$15,515,132	\$13,100,380	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095	\$48,817,095
Income Taxes	\$1,469,745,177	\$87,141,147	\$1,153,894	\$1,619,711,578	\$1,311,509	\$3,721,513	\$12,370,380	\$6,551,700	\$64,696,540	\$17,224,684	\$18,000,869	\$13,239,433	\$65,352	\$65,352	\$1,433,184	\$9,007,979	\$745,992	\$2,520,877	
Total Expenses - Current	\$1,069,246,698	\$837,140	\$106,201,404	\$1,276,134	\$1,682,602,223	\$209,249,933</													



NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch Costs

No.	Alias	Account Description	Rate Base										Street Lighting	Traffic Upkeep	Duck-to-Down			
			Rate 700	Rate 710	Rate 720	Rate 730	Rate 740	Rate 750	Rate 760	Rate 770	Rate 780	Rate 790						
Intangible Plant																		
36		302 ORGANIZATION	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
36		302 FRANCHISES & COMMENTS	\$420	\$1	\$156	\$2	\$129	\$7	\$37	\$197	\$126	\$4	\$0	\$2	\$400,898	\$22,269	\$92,355	
36		303 MISC INTANGIBLE PLANT	\$19,492,787	\$44,448	\$5,957,207	\$5,480,622	\$208,907	\$1,840,624	\$4,390,757	\$1,220,235	\$720	\$68,588	\$400,810	\$32,278	\$1,362,278	\$2,358	\$1,362,278	
		Total Intangible Plant	\$19,492,787	\$44,448	\$5,957,207	\$5,480,622	\$208,907	\$1,840,624	\$4,390,757	\$1,220,235	\$720	\$68,588	\$400,810	\$32,278	\$1,362,278	\$2,358	\$1,362,278	
Production Plant																		
340-316	STEAM	\$756,322,148	\$2,715,988	\$346,781,219	\$3,291,435	\$345,852,837	\$515,415,031	\$20,469,456	\$183,297,824	\$480,444,428	\$988,274,802	\$480,140,773	\$6,776,857	\$1,691	\$4,425,871	\$1,038,603	\$2,766,813	
340-318	HYDRO	\$6,796,096	\$2,098	\$2,945,882	\$27,650	\$3,920,920	\$4,362,804	\$173,787	\$1,587,057	\$4,078,645	\$4,078,645	\$47,066	\$811	\$7,586	\$52,700	\$13,902	\$23,673	
340-348	OTHER	\$45,427,859	\$155,020	\$1,789,776	\$1,871,812	\$16,851,603	\$23,245,516	\$1,188,083	\$10,465,058	\$28,000,979	\$33,543,515	\$27,412,712	\$986,000	\$4,107	\$25,893	\$394,758	\$39,439	
		Total Production Plant	\$818,646,103	\$2,893,485	\$361,516,877	\$3,649,350	\$365,235,165	\$517,242,613	\$20,651,326	\$194,169,939	\$512,524,452	\$988,274,802	\$480,140,773	\$6,776,857	\$1,691	\$4,425,871	\$1,038,603	\$2,766,813
Transmission Plant																		
360	LAND AND LAND RIGHTS	\$7,485,169	\$24,887	\$3,058,048	\$31,095	\$3,147,216	\$3,660,850	\$172,179	\$1,247,128	\$3,855,584	\$2,800,382	\$3,045,462	\$48,228	\$455	\$29,946	\$40,378	\$10,344	
362	STRUCTURES & IMPROVEMENTS	\$4,577,447	\$17,980,953	\$16,161	\$4,689,088	\$2,027,376	\$1,723,353	\$2,079,130	\$2,079,130	\$2,079,130	\$1,778,383	\$2,168	\$21,863	\$26	\$17,460	\$21,863	\$1,802	
364	TOWERS & FIXTURES	\$17,812,428	\$387,728	\$4,607,374	\$48,770	\$4,689,088	\$2,027,376	\$1,723,353	\$2,079,130	\$2,079,130	\$1,778,383	\$2,168	\$21,863	\$26	\$17,460	\$21,863	\$1,802	
366	POLES & FIXTURES	\$77,968	\$71,968	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	\$1,630,883	
368	OVERHEAD CONDUCTORS & DEVICES	\$38,228,372	\$19,228	\$1,700,228	\$160,228	\$1,811,548	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	\$1,700,228	
369	UNDERGROUND CONDUIT	\$1,000,000	\$300	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	
370	UNDERGROUND CONDUCTORS & DEVS	\$2,516,362	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	\$2,516	
372	ROADS & TRAILS	\$17,027	\$57	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	\$7,107	
		Total Transmission Plant	\$124,229,843	\$745,197	\$31,843,334	\$939,383	\$94,077,256	\$113,848,887	\$6,860,830	\$37,674,889	\$119,800,425	\$114,800,683	\$72,034,400	\$14,488,092	\$13,735	\$904,676	\$1,219,313	\$312,304
Distribution Plant																		
380	LAND AND LAND RIGHTS	\$1,857,253	\$5,849	\$562,663	\$8,286	\$322,204	\$287,358	\$10,201	\$77,671	\$20,852	\$17,533	\$4,075	\$17,079	\$33	\$6	\$1,063,837	\$2,585	
382	STRUCTURES & IMPROVEMENTS	\$159,012	\$1,200	\$23,638	\$1,231	\$56,460	\$85,467	\$3,422	\$19,150	\$19,447	\$3,204	\$0	\$0	\$0	\$0	\$3,387	\$2,273	
384	TOWERS & FIXTURES	\$15,789,759	\$15,789	\$1,181	\$17,568	\$386,612	\$320,510	\$111,978	\$78,930	\$18,737	\$18,737	\$11,286	\$11,286	\$81	\$16	\$1,032	\$2,873	
386	STRUCTURES & IMPROVEMENTS - SUBTRANS	\$5,168,179	\$15,785	\$7,919	\$17,568	\$386,612	\$320,510	\$111,978	\$78,930	\$18,737	\$18,737	\$11,286	\$11,286	\$81	\$16	\$1,032	\$2,873	
388	STRUCTURES & IMPROVEMENTS - RR	\$773,131	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
362	STATION EQUIPMENT	\$56,173,812	\$56,174	\$28,789,811	\$76,298	\$1,058,465	\$31,163,085	\$1,227,508	\$8,302,672	\$0	\$0	\$0	\$1,585,680	\$2,900	\$0	\$1,054,378	\$65,983	
364	STATION EQUIPMENT - SUBTRANS	\$14,743,250	\$119,074	\$6,913,982	\$122,116	\$8,592,257	\$6,851,618	\$338,475	\$1,985,771	\$1,934,010	\$37,881	\$0	\$338,588	\$815	\$0	\$1,116,022	\$225,538	
366	STATION EQUIPMENT - RR	\$3,437,480	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,477,480	\$0	
364.1	CUSTOMER STATIONS - SUBTRANS	\$5,173,998	\$0	\$0	\$0	\$178,414	\$170,885	\$178,414	\$170,885	\$178,414	\$170,885	\$178,414	\$170,885	\$178,414	\$170,885	\$178,414	\$170,885	
364.2	CUSTOMER STATIONS - RR	\$276,437	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
364.3	POLES TOWERS & FIXTURES - SUBTRANS	\$16,619,488	\$88,172	\$4,674,940	\$80,425	\$4,882,175	\$5,103,105	\$285,375	\$1,408,742	\$887,608	\$235,385	\$0	\$248,000	\$455	\$86,872	\$1,670,007	\$10,850	
364.4	POLES TOWERS & FIXTURES - PRIMARY	\$88,945,456	\$83,940	\$28,288,750	\$84,170	\$28,927,132	\$28,968,048	\$0	\$1,168,068	\$7,689,468	\$0	\$0	\$1,168,068	\$244	\$0	\$1,168,068	\$244	
364.5	POLES TOWERS & FIXTURES - SEC - DEMAND	\$27,289,142	\$27,289	\$2,182,628	\$21,828	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	\$2,182,628	
364.6	POLES TOWERS & FIXTURES - SEC - CUSTOMER	\$1,184,157	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	\$1,184	
365	OVERHEAD CONDUCTORS - SUBTRANS	\$9,449,088	\$28,588	\$2,877,577	\$28,588	\$3,155,504	\$3,288,298	\$165,471	\$99,221	\$65,834	\$152,137	\$0	\$160,889	\$294	\$0	\$55,528	\$24,724	
365	OVERHEAD CONDUCTORS - PRIMARY	\$37,889,818	\$37,890	\$2,877,577	\$28,588	\$3,155,504	\$3,288,298	\$165,471	\$99,221	\$65,834	\$152,137	\$0	\$160,889	\$294	\$0	\$55,528	\$24,724	
365	OVERHEAD CONDUCTORS - SEC - DEMAND	\$34,778,568	\$100,935	\$12,263,137	\$126,278	\$11,076,240	\$8,438,851	\$188,276	\$2,223,826	\$0	\$0	\$0	\$407,255	\$1,529	\$0	\$584,053	\$34,787	
365	OVERHEAD CONDUCTORS - SEC - CUSTOMER	\$14,000,000	\$14,000	\$1,400,000	\$14,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	\$1,400,000	
366	UNDERGROUND CONDUIT - SUBTRANS	\$1,610,000	\$84	\$4,477	\$87	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	\$3,927,171	
366	UNDERGROUND CONDUIT - PRIMARY	\$1,656,010	\$3,668	\$28,879	\$10,243	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	\$562,921	
366	UNDERGROUND CONDUIT - SEC - DEMAND	\$203,118	\$73	\$9,922	\$52	\$8,058	\$5,957	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	
366	UNDERGROUND CONDUIT - SEC - CUSTOMER	\$525,793	\$443,103	\$1,636	\$5,297	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	
367	UNDERGROUND CONDUCTORS - SUBTRANS	\$576,145	\$254,463	\$1,636	\$5,297	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	\$270	\$3,910	
367	UNDERGROUND CONDUCTORS - PRIMARY	\$112,728,032	\$679,083	\$36,981,752	\$87,252	\$37,703,645	\$1,465,140	\$1,154,068	\$0	\$19,184	\$4,097	\$0	\$19,184	\$3,609	\$0	\$1,182,336	\$1,672,222	
367	UNDERGROUND CONDUCTORS - SEC - DEMAND	\$3,204,196	\$1,573,780	\$4,699	\$8,073,15	\$6,254	\$269,352	\$32,324	\$110,136	\$0	\$0	\$0	\$30,169	\$76	\$0	\$26,842	\$17,225	
367	UNDERGROUND CONDUCTORS - SEC - CUSTOMER	\$85,792,101	\$30,117	\$10,680	\$3,784,184	\$18,369	\$286,197	\$17,816	\$325	\$0	\$0	\$0	\$50,653	\$589	\$874	\$1,182,336	\$2,887,727	
368	LINE TRANSFORMERS	\$148,159,867	\$255,090	\$88,373,272	\$29,891	\$42,707	\$17,475	\$618	\$1,420,725	\$2,618	\$618	\$0	\$1,420,725	\$857	\$0	\$914,446	\$1,042,068	
368	SERVICES	\$184,553,282	\$55,184	\$19,118,051	\$82,603	\$1,384,341	\$1,604,988	\$0	\$6,854	\$1,811	\$0	\$389,386	\$78	\$0	\$102,068	\$1,008	\$1,008	
370	METERS	\$54,573,617	\$18,857	\$18,975,940	\$176,025	\$54,546,055	\$903,000	\$8,248	\$21,913	\$575,256	\$268,825	\$21,388	\$887,238	\$0	\$0	\$0	\$0	
371	INSTALLATIONS ON CUST PREMISES	\$7,801,211	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
373	STREET LIGHTING & SIGNAL SYSTEMS	\$940,589,301	\$2,996,848	\$285,686,515	\$3,311,050	\$136,037,840	\$154,369,387	\$5,098,264	\$1,400,182	\$13,121,184	\$9,373,526	\$1,964,041	\$9,244,857	\$1,168	\$4,630,620	\$1,283,671	\$6,212,798	
		Total Distribution Plant	\$940,589,301	\$2,996,848	\$285,686,515	\$3,311,050	\$136,037,840	\$154,369,387	\$5,098,264	\$1,400,182	\$13,121,184	\$9,373,526	\$1,964,041	\$1,168	\$4,630,620	\$1,283,671	\$6,212,798	
General Plant																		
388	LAND AND LAND RIGHTS	\$72,824	\$286	\$22,942	\$280	\$17,207	\$21,587	\$873	\$7,904	\$17,529	\$19,989	\$16,174	\$468	\$3	\$287	\$2,458	\$889	
390	STRUCTURES & IMPROVEMENTS	\$5,842,272	\$30,226	\$1,655,966	\$18,672	\$1,414,002	\$1,684,762	\$17,726	\$494,487	\$1,440,480	\$1,650,357	\$1,259,082	\$282	\$21,865	\$286	\$4,065	\$3,056	
391.1	OFFICE FURNITURE & EQUIPMENT	\$14,980,083	\$14,980	\$879,918	\$8,844	\$877,055	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	\$4,871,258	
391.2	TRANSPORTATION EQUIPMENT	\$1,610,919	\$1,610	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	\$8,168	
391.3	TOOLS SHOP & GARAGE EQUIPMENT	\$8,094,428	\$3,166	\$24,859	\$3,444	\$1,8												





NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch CCSS

No.	Alloc.	Total	Account Description	Rate 711	Rate 720	Rate 721	Rate 722	Rate 723	Rate 724	Rate 725	Rate 726	Rate 727	Rate 728	Rate 729	Rate 730	Rate 731	Rate 732	Rate 733	Rate 734	Rate 735	Rate 736	Rate 737	Rate 738	Rate 739	Rate 740	Rate 741	Rate 742	Rate 743	Rate 744	Rate 745	Rate 746	Rate 747	Rate 748	Rate 749	Rate 750					
Steam Production - Operation																																								
500	1	\$9,457,335	FUEL	\$1,979,172	\$8,757	\$602,985	\$8,160	\$855,872	\$1,275,137	\$50,913	\$456,134	\$1,220,454	\$1,085,402	\$1,194,823	\$16,864	\$79	\$11,014	\$15,462	\$4,073	\$6,995	\$26,082	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
501	1	\$24,871,725	STEAM EXPENSES - FIXED	\$5,205,064	\$17,771	\$2,288,576	\$21,540	\$2,290,345	\$1,353,502	\$193,897	\$1,199,593	\$3,209,715	\$3,556,512	\$3,142,283	\$44,350	\$471	\$28,865	\$40,663	\$10,711	\$18,238	\$68,540	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
502	24	\$16,052,964	STEAM EXPENSES - VARIABLE	\$5,240,023	\$11,758	\$1,401,980	\$14,290	\$1,400,374	\$2,063,281	\$69,510	\$818,248	\$2,150,965	\$2,093,497	\$2,083,101	\$27,702	\$315	\$19,371	\$95,124	\$7,170	\$13,133	\$42,723	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
504	1	\$0	STEAM TRANSFERRED-CREDIT	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
505	1	\$33,126,897	ELECTRIC EXPENSES	\$4,830,903	\$16,524	\$2,110,359	\$20,029	\$2,062,478	\$3,118,243	\$174,304	\$1,115,438	\$2,894,544	\$3,865,988	\$2,921,842	\$41,239	\$438	\$26,833	\$37,810	\$9,959	\$16,859	\$83,731	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
506	1	\$6,899,593	MISC. STEAM POWER EXPENSES - FIXED	\$1,443,910	\$4,628	\$928,505	\$5,975	\$924,171	\$930,169	\$37,138	\$332,727	\$680,268	\$1,089,668	\$791,565	\$12,301	\$131	\$8,034	\$11,279	\$2,871	\$5,059	\$19,011	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
507	24	\$7,044,339	MISC. STEAM POWER EXPENSES - VARIABLE	\$1,428,887	\$8,595	\$914,951	\$8,271	\$914,509	\$905,405	\$39,278	\$359,501	\$1,142,461	\$1,428,887	\$1,428,887	\$188,491	\$138	\$8,500	\$24,189	\$3,146	\$5,763	\$18,747	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
507	1	\$9,218,000	RENTS	\$1,928,887	\$8,595	\$940,872	\$7,891	\$939,946	\$1,242,611	\$49,814	\$444,489	\$1,189,392	\$1,189,392	\$1,189,392	\$164,433	\$174	\$10,733	\$15,067	\$5,689	\$8,758	\$25,397	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
557	1	\$1,629,943	MARKET NON-FUEL LIFT CHARGES	\$341,087	\$1,165	\$148,725	\$1,412	\$147,465	\$219,765	\$8,774	\$78,009	\$212,333	\$252,717	\$205,914	\$2,005	\$31	\$1,890	\$2,665	\$702	\$1,195	\$4,491	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
557	1	\$89,257,888	MARKET NON-FUEL LIFT CHARGES	\$20,399,416	\$70,645	\$8,878,453	\$85,888	\$8,818,658	\$13,108,084	\$338,629	\$4,800,790	\$12,798,503	\$15,406,219	\$12,512,354	\$173,851	\$1,977	\$115,447	\$202,359	\$42,701	\$74,040	\$268,701	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Steam Production - Operation																																								
510	1	\$4,156,210	SUPERVISION AND MAINTENANCE	\$689,774	\$2,970	\$79,950	\$3,598	\$376,037	\$560,378	\$22,374	\$200,454	\$558,349	\$644,430	\$525,081	\$741	\$79	\$4,840	\$6,795	\$1,790	\$3,048	\$11,453	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
511	1	\$9,824,123	STRUCTURES	\$2,055,953	\$7,018	\$986,464	\$8,508	\$988,967	\$1,324,905	\$22,988	\$473,829	\$1,267,811	\$1,523,290	\$1,241,175	\$17,516	\$198	\$11,441	\$16,062	\$4,231	\$7,204	\$27,073	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
512	24	\$44,886,219	BOILER PLANT - FIXED	\$9,393,929	\$32,071	\$4,095,934	\$38,874	\$4,061,227	\$6,052,039	\$241,948	\$2,164,922	\$5,792,615	\$6,559,897	\$5,670,919	\$80,039	\$850	\$52,773	\$73,385	\$19,330	\$32,915	\$123,694	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
512	24	\$0	BOILER PLANT - VARIABLE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
513	1	\$21,231,315	ELECTRIC PLANT - FIXED	\$4,443,204	\$15,170	\$1,937,384	\$18,987	\$1,920,968	\$2,862,669	\$114,298	\$1,024,012	\$2,739,918	\$3,292,044	\$2,682,955	\$37,858	\$402	\$24,725	\$34,711	\$8,143	\$15,589	\$58,508	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
513	24	\$0	ELECTRIC PLANT - VARIABLE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
514	1	\$7,700,564	MISCELLANEOUS STEAM PLANT - FIXED	\$1,611,543	\$5,502	\$702,896	\$8,669	\$696,732	\$1,038,302	\$41,459	\$37,408	\$983,764	\$1,184,019	\$872,886	\$13,793	\$148	\$8,868	\$12,590	\$3,916	\$5,647	\$21,221	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
514	24	\$0	MISCELLANEOUS STEAM PLANT - VARIABLE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Total Steam Production - Maintenance																																								
548	1	\$87,798,441	STRUCTURES	\$18,974,103	\$62,732	\$8,011,715	\$76,038	\$7,943,030	\$11,838,031	\$472,663	\$4,234,625	\$11,390,456	\$13,863,680	\$11,092,417	\$156,557	\$1,862	\$102,497	\$143,942	\$37,889	\$64,582	\$241,348	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Total Steam																																								
548	1	\$186,096,028	STRUCTURES	\$38,773,519	\$133,377	\$16,890,172	\$161,726	\$16,762,868	\$24,946,115	\$1,006,292	\$9,040,374	\$24,129,960	\$29,019,900	\$23,664,781	\$330,508	\$3,539	\$217,694	\$345,801	\$80,510	\$138,423	\$510,650	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Hydraulic Production - Operation																																								
535	1	\$27,597	SUPERVISION AND ENGINEERING	\$5,783	\$20	\$2,513	\$24	\$2,481	\$3,713	\$148	\$1,328	\$3,564	\$4,270	\$3,479	\$49	\$1	\$32	\$45	\$12	\$20	\$76	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
537	1	\$0	HYDRAULIC EXPENSES	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
538	1	\$53,965	HYDRO POWER EXP	\$7,108	\$24	\$3,039	\$29	\$3,073	\$4,380	\$193	\$1,658	\$4,380	\$5,287	\$4,291	\$51	\$1	\$40	\$88	\$15	\$25	\$94	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Total Hydraulic Production - Operation																																								
545	1	\$51,533	STRUCTURES	\$12,872	\$44	\$5,612	\$53	\$5,565	\$8,293	\$331	\$2,986	\$7,937	\$9,536	\$7,770	\$110	\$1	\$72	\$101	\$26	\$45	\$189	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Hydraulic Production - Maintenance																																								
545	1	\$1,558	SUPERVISION AND ENGINEERING	\$328	\$1	\$142	\$1	\$141	\$210	\$7	\$75	\$201	\$242	\$197	\$3	\$0	\$2	\$3	\$1	\$4	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
545	1	\$750,767	STRUCTURES	\$157,117	\$536	\$68,608	\$650	\$67,928	\$101,227	\$4,042	\$38,210	\$96,887	\$116,411	\$94,852	\$1,339	\$14	\$1,227	\$1,600	\$421	\$2,098	\$8,551	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
543	1	\$978,376	RESERV. DAMS & WATERWAYS - FIXED	\$204,751	\$699	\$98,278	\$847	\$98,522	\$131,916	\$5,267	\$47,188	\$126,260	\$151,703	\$123,608	\$1745	\$19	\$1,139	\$1,600	\$421	\$717	\$2,898	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
543	24	\$0	RESERV. DAMS & WATERWAYS - VARIABLE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
544	1	\$438,130	ELECTRIC PLANT - FIXED	\$91,680	\$313	\$99,890	\$379	\$99,694	\$159,074	\$2,958	\$21,132	\$66,541	\$87,895	\$65,959	\$781	\$8	\$610	\$718	\$169	\$521	\$1,207	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
544	24	\$0	ELECTRIC PLANT - VARIABLE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
545	1	\$4,039	MISC. HYDRO PLANT - FIXED	\$845	\$3	\$368	\$3	\$365	\$645	\$22	\$195	\$521	\$626	\$510	\$7	\$5	\$7	\$2	\$3	\$11	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
545	24	\$0	MISC. HYDRO PLANT - VARIABLE	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Total Hydraulic Production - Maintenance																																								
545	1	\$2,172,859	STRUCTURES	\$454,729	\$1,553	\$198,277	\$1,882	\$196,597	\$232,972	\$11,588	\$104,800																													



NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch CROSS

No.	Account Description	Alloc.	Total	Residential Rate 711	Heat Pump Rate 720	CGS Rate 721	Small Rate 721	Comm. Rate 722	CGS Rate 722	Medium Rate 722	Large Rate 724	Market Rate 724	Off-peak Rate 726	Int. Serv. Rate 732	Int. Serv. Rate 735	Separation Rate 734	Power Pumping Rate 741	Int. W/W Rate 742	Railroad Light Rate 744	Street Lighting Rate 750	Traffic Signal Rate 750	Director's Rate 760	Indefinite.		
Customer Accounts																									
801	SUPERVISION	46	\$1,189,741	\$932,198	\$7,645	\$165,441	\$1,121	\$45,897	\$70,939	\$2,936	\$32,567	\$11,979	\$10,172	\$6,989	\$1,829	\$9	\$1,578	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
802	METER READING - MANUAL	17	\$2,359,950	\$189,540	\$30,669	\$277,452	\$0	\$411,936	\$964,620	\$16,547	\$304,392	\$61,335	\$24,274	\$16,997	\$9,895	\$0	\$4,572	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
803	METER READING - AMR	18	\$1,207,408	\$1,082,091	\$268	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	\$647	
804	CUSTOMER RECORDS & COLLECTION	19	\$1,975,045	\$9,609,251	\$11,314	\$1,620,150	\$16,307	\$179,674	\$17,188	\$81,308	\$69,342	\$12,735	\$7,423	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
805	UNCOLLECTIBLE ACCOUNTS	16	\$4,595,941	\$4,074,314	\$781	\$358,725	\$1,351	\$194,708	\$22,507	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
806	Bad Debt Expense	16	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
806	MISC. CUSTOMER ACCTS EXPENSES	46	\$218,191	\$192,029	\$1,439	\$28,537	\$224	\$8,417	\$14,659	\$460	\$3,976	\$2,187	\$1,885	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Total Customer Accounts																									
			\$21,545,674	\$19,529,949	\$112,545	\$2,472,704	\$18,751	\$948,613	\$1,161,325	\$35,701	\$477,389	\$183,259	\$161,107	\$101,442	\$26,038	\$151	\$22,674	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$132
Customer Service & Information Expenses:																									
807	SUPERVISION	10	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
808	CUSTOMER ASSISTANCE	10	\$10	\$9	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
809	INFORMATIONAL & INSTRUCTIONAL	10	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
810	MISC. CUSTOMER SERVICE & INFO	20	\$1,487,988	\$944,542	\$2,011	\$190,096	\$571	\$190,097	\$190,097	\$571	\$78,219	\$84,719	\$21,599	\$34,925	\$47,518	\$39,469	\$22,815	\$22,815	\$7,598	\$1,900	\$1,900	\$1,900	\$1,900	\$1,900	\$1,900
Total Customer Service & Information Expenses																									
			\$1,487,979	\$944,531	\$2,011	\$190,097	\$571	\$190,097	\$190,097	\$571	\$78,219	\$84,719	\$21,599	\$34,925	\$47,518	\$39,469	\$22,815	\$22,815	\$7,598	\$1,900	\$1,900	\$1,900	\$1,900	\$1,900	\$1,900
Sales Expenses:																									
911	SUPERVISION	10	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
912	DEMONSTRATING & SELLING	10	\$75,669	\$64,674	\$23	\$9,110	\$39	\$887	\$68	\$68	\$68	\$1	\$23	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	
913	ADVERTISING	10	\$75,592	\$64,608	\$248	\$95,982	\$417	\$6,226	\$72	\$10	\$242	\$15	\$10	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
914	MISC. SALES EXPENSE	10	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Total Sales Expenses																									
			\$670,260	\$569,290	\$272	\$94,929	\$457	\$6,813	\$792	\$11	\$265	\$17	\$11	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	\$1	
Administrative and General Expenses:																									
920	AGG SALARIES	47	\$75,449,941	\$56,018,908	\$198,803	\$8,315,036	\$85,471	\$6,403,976	\$8,581,322	\$324,847	\$2,941,510	\$6,630,939	\$7,442,718	\$6,019,422	\$1,981,354	\$1,276	\$80,208	\$9,144,664	\$38,988	\$323,387	\$194,998	\$194,998	\$194,998	\$194,998	
921	OFFICE SUPPLIES & EXPENSES	47	\$27,565,748	\$8,050,139	\$40,941	\$2,499,029	\$75,992	\$1,915,274	\$2,586,465	\$97,154	\$970,724	\$1,951,182	\$2,225,028	\$1,800,283	\$5,435	\$292	\$20,674	\$73,665	\$11,680	\$84,720	\$59,319	\$59,319	\$59,319	\$59,319	
922	ADMIN. EXPENSE TRAVEL-CR	47	\$3,105,908	\$1,009,039	\$5,835	\$3,402,929	\$3,518	\$283,612	\$83,524	\$13,927	\$212,604	\$296,580	\$396,371	\$407,782	\$7,630	\$43	\$4,094	\$27,692	\$1,912	\$1,912	\$1,912	\$1,912	\$1,912	\$1,912	
923	OUTSIDE SERVICES EMPLOYED	51	\$43,049,258	\$19,187,808	\$41,990	\$4,827,550	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	\$90,026	
924	PROPERTY IMPROVEMENTS	50	\$6,979,794	\$2,193,887	\$7,691	\$9,921,784	\$8,510	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	\$9,921,784	
925	INSURANCE & DAMAGES	47	\$8,821,954	\$3,148,822	\$16,005	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	\$9,972,152	
926	EMPLOYEE PENSIONS & BENEFITS	47	\$4,913,725	\$16,023,056	\$8,140	\$4,948,764	\$9,078	\$3,816,749	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	\$3,108,233	
927	REGULATORY COMMISSION EXPENSE	51	\$941,181	\$29,720	\$718	\$94,941	\$0,078	\$7,615	\$103,088	\$3,921	\$34,501	\$2,213	\$94,287	\$78,949	\$2,285	\$14	\$1,282	\$7,718	\$4,21	\$1,863	\$19,511	\$16,078	\$16,078	\$16,078	
928	AGG OVERHEAD-LOSS	47	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
929	GENERAL ADVERTISING EXPENSE	51	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
930	GENERAL ADVERTISING EXPENSE	51	\$2,786,988	\$82,173	\$2,913	\$312,968	\$3,242	\$257,152	\$341,549	\$12,892	\$114,640	\$271,387	\$312,423	\$251,694	\$7,475	\$45	\$4,248	\$25,573	\$1,384	\$6,129	\$8,438	\$8,438	\$8,438	\$8,438	
931	RENTALS	53	\$3,056,831	\$925,570	\$3,164	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621	\$398,468	\$3,621
932	MAINTENANCE OF GENERAL PLANT	40	\$1,131,389	\$425,000	\$2,182	\$131,288	\$1,300	\$101,122	\$135,503	\$5,129	\$46,448	\$103,016	\$117,524	\$96,049	\$2,027	\$20	\$1,697	\$14,443	\$916	\$5,107	\$3,079	\$3,079	\$3,079	\$3,079	\$3,079
940	Misc. Expenses	51	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Total Administrative and General Expenses																									
			\$206,510,678	\$70,806,942	\$31,863	\$2,890,492	\$38,052	\$17,991,752	\$33,991,752	\$99,432	\$817,145	\$1,848,630	\$2,118,816	\$17,058,247	\$520,924	\$3,453	\$23,348	\$2,312,965	\$105,291	\$765,225	\$559,255	\$559,255	\$559,255	\$559,255	
TOTAL O & M EXPENSES																									
			\$506,239,279	\$164,629,408	\$694,878	\$9,309,431	\$94,608	\$44,090,448	\$59,741,940	\$2,313,986	\$20,825,831	\$48,817,095	\$56,291,362	\$48,817,095	\$56,291,362	\$10,345	\$64,431	\$4,679,748	\$246,892	\$1,594,633	\$1,594,633	\$1,594,633	\$1,594,633	\$1,594,633	
Depreciation Expense																									
Production Plant																									
310-315	STEAM	1	\$148,379,743	\$31,082,212	\$106,017	\$18,539,939	\$128,504	\$13,405,107	\$20,006,323	\$798,803	\$71,566,534	\$19,418,520	\$23,007,178	\$18,746,232	\$264,582	\$2,808	\$172,798	\$242,597	\$63,888	\$108,808	\$108,808	\$108,808	\$108,808	\$108,808	
330-335	HYDRO	1	\$1,196,642	\$250,428	\$865	\$109,195	\$1,038	\$108,970	\$161,346	\$6,442	\$57,715	\$154,428	\$195,547	\$151,183	\$23	\$134	\$1,944	\$1,965	\$515	\$877	\$3,298	\$3,298	\$3,298	\$3,298	
340-348	OTHER	1	\$3,694,493	\$1,189,828	\$4,092	\$518,717	\$4,823	\$514,322	\$766,451	\$30,402	\$724,170	\$723,589	\$881,415	\$718,178	\$10,136	\$708	\$6,620	\$9,284	\$2,448	\$4,188	\$4,188	\$4,188	\$4,188	\$4,188	
Total Production Plant																									
			\$153,269,878	\$37,492,468	\$110,994	\$14,657,751	\$134,468	\$134,047,699	\$20,994,113	\$885,847	\$7,488,419	\$20,098,586	\$24,074,240	\$19,615,592	\$276,852	\$2,299	\$180,812	\$233,837	\$66,882	\$113,932	\$113,932	\$113,932	\$113,932	\$113,932	
Transmission Plant																									
350	LAND AND LAND RIGHTS	2	\$110,311	\$27,590	\$31	\$11,257	\$114	\$11,585	\$14,543	\$450	\$4,591	\$14,598	\$13,990	\$11,214	\$181	\$2	\$110	\$149	\$38	\$38	\$38	\$38	\$38	\$38	
351	STRUCTURES & IMPROVEMENTS	2	\$382,423	\$97,520	\$331	\$38,829	\$405	\$40,980	\$51,454	\$1,381	\$16,324	\$51,649	\$48,497	\$38,878	\$642	\$6	\$390	\$226	\$153	\$156	\$156	\$156	\$156	\$156	
352	ELECTRICAL EQUIPMENT	2	\$13,261,699	\$3,298,742	\$10,866	\$1,345,888	\$13,888	\$1,345,888	\$1,729,874	\$53,770	\$648,878	\$1,742,314	\$1,672,696	\$1,340,804	\$21,679	\$7	\$13,180	\$17,771	\$4,853	\$4,280	\$4,280	\$4,280	\$4,280	\$4,280	
353	TOWERS & FENCINGS	2	\$427,798	\$113,708	\$324	\$48,583	\$472	\$48,583	\$69,334	\$1,893	\$61,851	\$57,655	\$46,217	\$27,877	\$37	\$154	\$613	\$1,018	\$1,018	\$1,018	\$1,018	\$1,018	\$1,018	\$1,018	
354	POLES & RIGGING	2	\$4,262,120	\$1,085,227	\$3,808	\$424,614	\$4,419	\$447,288	\$581,471	\$17,383	\$177,242	\$589,585	\$540,118	\$429,871	\$7,091	\$45	\$2,651	\$3,748	\$1,470	\$1,378	\$1,378	\$1,378	\$1,378	\$1,378	
355	UNDERGROUND CONDUITS & DEVICES	2	\$2,886,828	\$2																					

Attachment GAW-4  
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NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch CCDS

No.	Alloc. No.	Account Description	Expenses										Street Lighting	Traffic Lighting	Dusk-to-Dawn																	
			Residential	Heat Pump	CRGS	Small	Comm.	SH	Medium	Large	GS	Metal				DF-Peak	Ind.	Pwr. Serv.	HLF Ind.	Air Separation	Mumt. Power	Int. WW Pumping	Railroad	Street Lighting	Traffic Lighting	Dusk-to-Dawn						
			Rate 711	Rate 720	Rate 721	Rate 722	Rate 723	Rate 724	Rate 725	Rate 726	Rate 727	Rate 728	Rate 729	Rate 730	Rate 731	Rate 732	Rate 733	Rate 734	Rate 741	Rate 742	Rate 743	Rate 744	Rate 751	Rate 752	Rate 753	Rate 754	Rate 755	Rate 756	Rate 757			
360.2		Distribution Plant																														
360.2		LAND RIGHTS	\$8,245	\$4,638	\$14	\$1,405	\$16	\$730	\$718	\$25	\$104	\$52	\$45	\$52	\$10	\$10	\$10	\$10	\$44	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
361		STRUCTURES & IMPROVEMENTS	\$17,634	\$8,624	\$284	\$29,239	\$27	\$15,187	\$14,685	\$4,086	\$80	\$1,084	\$322	\$212	\$212	\$348	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
361		STRUCTURES & IMPROVEMENTS - SUB-TRANS	\$4,908	\$2,648	\$131	\$6,922	\$134	\$7,228	\$7,556	\$372	\$2,083	\$372	\$1,463	\$348	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
361		STRUCTURES & IMPROVEMENTS - RR	\$13,487	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
362		STATION EQUIPMENT	\$4,825,992	\$2,245,682	\$13,643	\$716,731	\$13,889	\$749,738	\$751,030	\$224,582	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
362		STATION EQUIPMENT - SUB-TRANS	\$1,077,317	\$475,613	\$2,870	\$152,153	\$2,943	\$158,938	\$165,088	\$8,181	\$45,784	\$32,150	\$7,561	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
362		STATION EQUIPMENT - RR	\$82,849	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
364.1		CUSTOMER STATIONS	\$1,379,015	\$0	\$0	\$126,322	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
364.1		CUSTOMER STATIONS - SUB-TRANS	\$188,334	\$0	\$0	\$25,977	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
364.1		CUSTOMER STATIONS - RR	\$6,399	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
364.2		POLES TOWERS & FITTINGS - SUB-TRANS	\$1,420,929	\$827,176	\$3,763	\$200,555	\$3,979	\$209,445	\$10,784	\$80,949	\$22,377	\$10,098	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
364.2		POLES TOWERS & FITTINGS - PRIMARY	\$53,356,478	\$22,889,127	\$1,171	\$1,211,368	\$23,474	\$1,267,148	\$48,989	\$341,946	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
364.2		POLES TOWERS & FITTINGS - SEC - DEMAND	\$750,720	\$388,727	\$1,889	\$142,290	\$1,465	\$128,518	\$63,107	\$2,185	\$26,904	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
365.2		POLES TOWERS & FITTINGS - SEC - CUSTOMER	\$2,913,785	\$2,465,642	\$884	\$806,437	\$1,487	\$2,671	\$1,426	\$18	\$877	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
365		OVERHEAD CONDUCTORS - SUB-TRANS	\$541,272	\$299,051	\$1,442	\$76,446	\$1,479	\$79,934	\$83,447	\$4,111	\$23,003	\$16,153	\$3,849	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
365		OVERHEAD CONDUCTORS - PRIMARY	\$2,060,784	\$958,980	\$5,763	\$306,057	\$5,931	\$320,151	\$320,703	\$12,632	\$86,269	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
365		OVERHEAD CONDUCTORS - SEC - DEMAND	\$1,636,918	\$803,998	\$2,554	\$130,257	\$3,185	\$280,229	\$137,803	\$4,763	\$55,265	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
365		OVERHEAD CONDUCTORS - SEC - CUSTOMER	\$1,113,977	\$697,942	\$338	\$117,050	\$572	\$8,278	\$545	\$7	\$259	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
366		UNDERGROUND CONDUIT - SUB-TRANS	\$431	\$160	\$1	\$61	\$1	\$84	\$66	\$3	\$18	\$13	\$3	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
366		UNDERGROUND CONDUIT - PRIMARY	\$49,404	\$22,822	\$136	\$7,189	\$18	\$7,220	\$7,553	\$297	\$2,028	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
366		UNDERGROUND CONDUIT - SEC - DEMAND	\$640	\$314	\$1	\$121	\$1	\$110	\$54	\$2	\$22	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
366		UNDERGROUND CONDUIT - SEC - CUSTOMER	\$7,151	\$5,028	\$1	\$752	\$4	\$53	\$3	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
367		UNDERGROUND CONDUCTORS - SUB-TRANS	\$16,881	\$7,458	\$46	\$2,384	\$46	\$2,490	\$2,603	\$128	\$171	\$504	\$120	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
367		UNDERGROUND CONDUCTORS - PRIMARY	\$7,098,721	\$3,302,858	\$19,821	\$1,054,265	\$20,429	\$1,104,717	\$43,515	\$1,104,717	\$287,514	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
367		UNDERGROUND CONDUCTORS - SEC - DEMAND	\$93,889	\$46,112	\$148	\$17,794	\$163	\$16,072	\$7,892	\$273	\$3,227	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
367		UNDERGROUND CONDUCTORS - SEC - CUSTOMER	\$1,048,709	\$683,781	\$318	\$110,291	\$539	\$7,900	\$513	\$7	\$244	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
368		LINE TRANSFORMERS	\$4,209,968	\$2,518,719	\$4,337	\$1,502,345	\$7,393	\$1,088,785	\$12,844	\$726	\$24,452	\$43	\$10	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
369		SERVICES	\$1,379,995	\$1,286,034	\$370	\$128,088	\$622	\$6,275	\$1,078	\$0	\$45	\$1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
370		METERS	\$5,311,297	\$3,979,253	\$1,489	\$1,356,380	\$12,834	\$391,071	\$65,945	\$601	\$16,461	\$42,235	\$21,786	\$15,558	\$26,783	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
371		INSTALLATIONS ON CUST PREMISES	\$404,103	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
372		STREET LIGHTING & SIGNAL SYSTEMS	\$1,498,755	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
		Total Distribution Plant	\$48,109,138	\$25,054,293	\$95,469	\$7,936,063	\$100,891	\$4,840,138	\$4,845,069	\$175,237	\$1,281,491	\$477,856	\$346,103	\$76,942	\$27,216	\$521	\$110,879	\$1,798,993	\$42,929	\$485,140	\$186,489	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
389		LAND AND LAND RIGHTS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
390		STRUCTURES & IMPROVEMENTS	\$2,453,371	\$875,944	\$4,451	\$270,376	\$2,779	\$208,235	\$279,035	\$10,963	\$95,848	\$212,138	\$242,011	\$195,731	\$6,027	\$42	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
391.1		OFFICE FURNITURE & EQUIPMENT	\$1,195,945	\$428,658	\$2,170	\$101,800	\$1,355	\$109,501	\$186,021	\$5,149	\$46,625	\$103,410	\$117,973	\$95,413	\$2,938	\$20	\$1,573	\$14,409	\$618	\$5,128	\$3,091	\$1,946	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
391.2		COMPUTER EQUIPMENT	\$2,353,785	\$1,046,636	\$2,283	\$238,321	\$3,323	\$249,011	\$333,875	\$12,631	\$114,377	\$233,676	\$238,402	\$238,068	\$7,207	\$50	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
392		TRANSPORTATION EQUIPMENT	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
393		STORES EQUIPMENT	\$21,104	\$75,290	\$383	\$23,256	\$239	\$17,813	\$24,003	\$809	\$8,228	\$18,248	\$20,818	\$16,897	\$818	\$4	\$277	\$2,559	\$109	\$805	\$945	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
394		TOOLS, SHOP & GARAGE EQUIPMENT	\$875,033	\$133,770	\$1,588	\$96,434	\$891	\$74,270	\$89,522	\$3,767	\$4,114	\$7,662	\$66,317	\$68,610	\$2,150	\$15	\$1,151	\$10,808	\$462	\$3,751	\$2,261	\$1,946	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
395		LABORATORY EQUIPMENT	\$520,639	\$165,739	\$945	\$57,378	\$590	\$44,190	\$59,215	\$2,242	\$20,299	\$46,018	\$51,358	\$41,537	\$1,279	\$9	\$685	\$6,312	\$269	\$2,323	\$1,346	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
396		POWER OPERATED EQUIPMENT	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
397		COMMUNICATION EQUIPMENT	\$2,152,357	\$767,857	\$3,905	\$237,203																										

NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch CCDS

No.	Account Description	Alloc. No.	Total	Residential Rate 711	CG&S Heat Pump Rate 720	CG&S Small Rate 721	Comm. SH Rate 722	Medium Rate 723	GS Rate 724	Metal Mchng Rate 725	Off-Peak Serv. Rate 726	Int. Pwr. Serv. Rate 732	Int. Pwr. Serv. Rate 733	HUF Ind. Pwr. Serv. Rate 734	Air Separation Rate 735	Muni. Power Rate 741	Int. WW Pumping Rate 742	Railroad Rate 744	Street Lighting Rate 745	Traffic Lighting Rate 755	Dusk-to-Dawn Rate 750	Interdepart.
48	Taxes Other Than Income Taxes		\$9,729,007	\$9,182,763	\$30,571	\$3,334,120	\$34,448	\$2,727,277	\$3,619,785	\$137,685	\$1,214,813	\$2,888,498	\$3,313,298	\$2,668,467	\$78,557	\$481	\$48,075	\$289,855	\$14,822	\$68,148	\$89,543	
48	REAL ESTATE & PERSONAL PROPERTY TAX		\$4,462	\$4,462	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
48	PROPERTY TAX EXP - NONUTILITY		\$2,785,464	\$2,785,464	\$25,832	\$2,800,353	\$27,466	\$2,135,883	\$2,800,059	\$106,627	\$693,131	\$2,205,095	\$2,518,946	\$2,027,424	\$69,752	\$383	\$38,558	\$135,878	\$9,870	\$45,127	\$69,847	
52	UTILITY RECEIPTS TAX - Increase		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
47	STATE UNEMPLOYMENT COMPENSATION		\$104,538	\$37,301	\$180	\$11,523	\$118	\$8,678	\$11,892	\$4,076	\$9,041	\$10,314	\$8,342	\$257	\$2	\$2	\$137	\$1,286	\$64	\$448	\$270	
48	SALES & USE TAX		\$13,688	\$37,366	\$124	\$13,549	\$140	\$11,063	\$14,710	\$660	\$4,896	\$11,738	\$10,464	\$333	\$2	\$183	\$1,097	\$60	\$277	\$364	\$364	
48	STATE PUBLIC UTILITY FEE - Increase		\$1,979,259	\$611,714	\$2,034	\$2,218,663	\$2,292	\$1,811,481	\$2,401,872	\$9,163	\$90,824	\$192,209	\$220,476	\$177,588	\$5,284	\$32	\$2,989	\$17,957	\$986	\$4,535	\$5,658	
48	STATE PUBLIC UTILITY FEE		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
47	FICA/MEDICARE/UNEMPLOYMENT COMP		\$9,429,730	\$3,361,954	\$17,088	\$1,038,558	\$10,675	\$798,984	\$1,071,817	\$40,574	\$367,368	\$814,848	\$929,604	\$751,833	\$23,151	\$158	\$14,391	\$114,246	\$4,870	\$40,393	\$24,855	
48	FEDERAL EXCISE TAX		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
47	HOSP INS		\$2,382,921	\$850,111	\$4,323	\$262,612	\$2,699	\$202,256	\$271,022	\$10,260	\$92,801	\$208,044	\$285,062	\$180,110	\$5,854	\$40	\$3,133	\$28,889	\$1,231	\$10,214	\$6,159	
	TOTAL TAXES OTHER THAN INCOME TAX		\$66,527,209	\$21,441,134	\$80,176	\$7,482,854	\$77,832	\$6,056,945	\$8,030,467	\$305,340	\$2,703,980	\$6,327,712	\$7,241,429	\$5,834,808	\$177,194	\$1,100	\$89,581	\$569,311	\$31,895	\$169,147	\$196,304	
32	Non-Trackable Fuel		\$14,678,304	\$2,962,772	\$10,760	\$1,281,463	\$13,088	\$1,280,543	\$1,886,725	\$81,850	\$749,144	\$1,956,906	\$2,380,714	\$1,813,984	\$25,332	\$288	\$17,714	\$50,407	\$6,557	\$12,010	\$39,067	
	Non-Trackable Fuel Expense		\$14,678,304	\$2,962,772	\$10,760	\$1,281,463	\$13,088	\$1,280,543	\$1,886,725	\$81,850	\$749,144	\$1,956,906	\$2,380,714	\$1,813,984	\$25,332	\$288	\$17,714	\$50,407	\$6,557	\$12,010	\$39,067	
	TOTAL Non-Trackable Fuel		\$14,678,304	\$2,962,772	\$10,760	\$1,281,463	\$13,088	\$1,280,543	\$1,886,725	\$81,850	\$749,144	\$1,956,906	\$2,380,714	\$1,813,984	\$25,332	\$288	\$17,714	\$50,407	\$6,557	\$12,010	\$39,067	
32	Fuel and Purchased Power		\$318,209,938	\$64,224,151	\$233,028	\$27,776,342	\$283,287	\$27,758,392	\$40,888,628	\$1,774,274	\$16,239,238	\$42,636,714	\$51,606,854	\$41,489,728	\$549,113	\$6,248	\$83,977	\$1,092,871	\$149,128	\$280,331	\$806,954	
32	501 Steam Production Fuel		\$70,551,954	\$14,239,734	\$81,667	\$6,158,985	\$62,806	\$6,154,571	\$8,600,553	\$8,453,382	\$1,442,286	\$9,198,073	\$12,171,749	\$12,171,749	\$12,171,749	\$1,385	\$85,185	\$242,266	\$51,513	\$57,720	\$187,764	
32	547 Other Power Production Fuel		\$143,100,931	\$28,862,633	\$104,796	\$12,482,354	\$127,389	\$12,483,392	\$18,399,177	\$797,917	\$7,303,022	\$19,174,349	\$23,208,392	\$18,658,533	\$246,944	\$2,810	\$172,890	\$491,390	\$63,917	\$177,075	\$380,043	
32	555 Purchase Power		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
32	556 System control and load dispatching		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
32	557.1 Other expenses		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
34	Fuel Casis - Off System Sales		\$531,856,823	\$107,346,418	\$389,490	\$46,429,650	\$473,463	\$46,396,315	\$68,359,346	\$2,865,582	\$27,142,813	\$74,264,446	\$86,257,442	\$69,347,335	\$917,806	\$10,443	\$641,792	\$1,826,328	\$237,536	\$435,126	\$1,415,461	
	TOTAL		\$531,856,823	\$107,346,418	\$389,490	\$46,429,650	\$473,463	\$46,396,315	\$68,359,346	\$2,865,582	\$27,142,813	\$74,264,446	\$86,257,442	\$69,347,335	\$917,806	\$10,443	\$641,792	\$1,826,328	\$237,536	\$435,126	\$1,415,461	
50	Income Taxes		\$66,532,229	\$20,558,660	\$74,964	\$7,655,036	\$81,148	\$6,241,985	\$8,195,749	\$311,261	\$2,739,886	\$6,412,156	\$7,214,659	\$5,833,973	\$186,274	\$1,084	\$106,395	\$385,804	\$28,598	\$128,926	\$205,388	
	Income Taxes		\$66,532,229	\$20,558,660	\$74,964	\$7,655,036	\$81,148	\$6,241,985	\$8,195,749	\$311,261	\$2,739,886	\$6,412,156	\$7,214,659	\$5,833,973	\$186,274	\$1,084	\$106,395	\$385,804	\$28,598	\$128,926	\$205,388	
	TOTAL		\$66,532,229	\$20,558,660	\$74,964	\$7,655,036	\$81,148	\$6,241,985	\$8,195,749	\$311,261	\$2,739,886	\$6,412,156	\$7,214,659	\$5,833,973	\$186,274	\$1,084	\$106,395	\$385,804	\$28,598	\$128,926	\$205,388	
	Revenues		\$1,609,246,688	\$435,489,445	\$824,140	\$206,201,404	\$1,262,393	\$465,696,560	\$207,653,116	\$6,337,891	\$70,976,676	\$166,833,378	\$185,241,697	\$139,053,541	\$3,144,985	\$122,204	\$2,036,517	\$6,787,505	\$905,824	\$2,259,406	\$2,589,475	
	Non-Fuel Expenses - Gasks shows \$825,142,243, diff. because he uses proposed n		\$826,854,488	\$256,979,974	\$1,030,254	\$88,151,803	\$912,379	\$73,922,742	\$100,022,191	\$3,558,995	\$34,248,457	\$84,580,631	\$94,278,621	\$76,170,930	\$2,019,143	\$15,733	\$1,086,952	\$7,540,028	\$409,970	\$2,340,271	\$2,335,913	
	Fuel Expense		\$14,678,304	\$2,962,772	\$10,760	\$1,281,463	\$13,088	\$1,280,543	\$1,886,725	\$81,850	\$749,144	\$1,956,906	\$2,380,714	\$1,813,984	\$25,332	\$288	\$17,714	\$50,407	\$6,557	\$12,010	\$39,067	
	Non-Trackable Fuel		\$531,856,823	\$107,346,418	\$389,490	\$46,429,650	\$473,463	\$46,396,315	\$68,359,346	\$2,865,582	\$27,142,813	\$74,264,446	\$86,257,442	\$69,347,335	\$917,806	\$10,443	\$641,792	\$1,826,328	\$237,536	\$435,126	\$1,415,461	
	Purchased Power & Fuel Costs		\$546,556,227	\$110,309,191	\$400,240	\$47,711,134	\$486,530	\$47,576,858	\$70,246,071	\$3,047,432	\$27,881,958	\$73,233,352	\$88,638,156	\$71,261,328	\$943,138	\$10,732	\$659,505	\$1,876,735	\$244,115	\$447,135	\$1,454,528	
	Total Fuel Expense		\$9,832,335	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Off-System Sales - Fuel		\$63,599,234	\$19,655,887	\$71,670	\$7,328,234	\$77,323	\$5,967,711	\$7,885,626	\$397,585	\$2,619,495	\$6,130,406	\$6,992,252	\$5,525,451	\$178,089	\$1,086	\$101,720	\$388,852	\$27,333	\$123,261	\$196,364	
	Interest Exp		\$162,424,516	\$48,595,294	\$678,024	\$63,010,243	\$213,658	\$38,129,249	\$39,549,239	\$866,121	\$6,216,782	\$6,890,980	\$4,665,372	\$20,004,147	\$2,616	\$94,703	\$189,339	\$998,110	\$224,406	\$651,262	\$1,397,690	
	Taxable Income		\$64,370,866	\$19,258,922	\$268,709	\$24,971,747	\$84,675	\$15,111,098	\$11,710,729	\$443,255	\$2,457,672	\$2,330,673	\$1,850,134	\$7,237,894	\$1,036	\$37,532	\$74,641	\$395,563	\$88,935	\$28,103	\$553,898	
	Income Taxes @ Effective Rate Ratio		1,0000	0.2992	(0.0042)	0.3879	(0.0013)	0.2348	0.1819	(0.0053)	0.0983	0.0363	(0.0287)	(0.1232)	0.0000	0.0012	0.0066	0.0012	(0.0051)	0.0014	(0.0086)	
	Co. Calc. Income Taxes		\$66,522,229	\$20,558,660	\$74,964	\$7,655,036	\$81,148	\$6,241,985	\$8,195,749	\$311,261	\$2,739,886	\$6,412,156	\$7,214,659	\$5,833,973	\$186,274	\$1,084	\$106,395	\$385,804	\$28,598	\$128,926	\$205,388	
	Allocated Income Taxes		\$66,522,228	\$19,902,482	\$77,690	\$25,806,337	\$87,505	\$15,616,132	\$12,102,118	\$854,727	\$3,546,125	\$3,412,701	\$1,911,968	\$8,193,855	\$4,071	\$38,786	\$77,136	\$408,784	\$91,907	\$266,729	\$572,410	

NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch CC055

		Labor																			
No.	Account Description	Alloc. No.	Total	Residential Rate 711	C&GS Heat Pump Rate 720	GS Small Rate 721	Comm. SH Rate 722	GS Medium Rate 723	GS Large Rate 724	Metal Melting Rate 725	Off-Peak Serv. Rate 726	Ind. Pwr. Serv. Rate 732	HLF Ind. Pwr. Serv. Rate 733	Air Separation Rate 734	Muni. Power Rate 741	Int. WW Pumping Rate 742	Railroad Rate 744	Street Lighting Rate 750	Traffic Lighting Rate 755	Dusk-to-Dawn Rate 760	Interdepart.
Labor Expense																					
Steam Production - Operation																					
500	SUPERVISION & ENGINEERING	1	\$5,636,642	\$1,178,813.80	\$4,027	\$514,351	\$4,862	\$509,992	\$759,999	\$30,345	\$271,862	\$727,413	\$673,095	\$712,131	\$10,051	\$107	\$6,564	\$9,215	\$2,427	\$4,133	\$15,533
501	FUEL	1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
502	STEAM EXPENSES	1	\$13,756,759	\$2,878,959	\$9,829	\$1,255,322	\$11,914	\$1,244,685	\$1,854,850	\$74,060	\$663,505	\$1,775,320	\$2,133,069	\$1,738,023	\$24,530	\$260	\$16,021	\$22,491	\$5,924	\$10,088	\$37,910
505	ELECTRIC EXPENSES	1	\$6,116,975	\$1,280,136	\$4,371	\$558,182	\$5,298	\$553,452	\$824,783	\$32,931	\$295,029	\$789,400	\$948,474	\$772,816	\$10,907	\$116	\$7,124	\$10,001	\$2,634	\$4,486	\$16,857
506	MISC. STEAM POWER EXPENSES	1	\$5,276,176	\$1,104,177	\$3,770	\$481,458	\$4,569	\$477,378	\$711,397	\$28,404	\$254,476	\$680,885	\$818,103	\$666,590	\$9,408	\$100	\$6,144	\$8,626	\$2,272	\$3,869	\$14,540
Total Steam Production - Operation			\$30,786,552	\$6,442,885	\$21,997	\$2,809,312	\$26,663	\$2,785,507	\$4,151,009	\$165,739	\$1,484,873	\$3,973,028	\$4,773,641	\$3,889,560	\$54,897	\$583	\$35,853	\$50,333	\$13,258	\$22,576	\$84,839
Steam Production - Maintenance																					
510	SUPERVISION AND ENGINEERING	1	\$3,784,763	\$792,060	\$2,704	\$345,364	\$3,278	\$342,438	\$510,307	\$20,375	\$182,544	\$488,427	\$586,851	\$478,165	\$6,749	\$72	\$4,408	\$8,188	\$1,630	\$2,775	\$10,430
511	STRUCTURES	1	\$3,638,257	\$781,400	\$2,600	\$331,986	\$3,151	\$329,162	\$490,553	\$19,587	\$175,478	\$469,520	\$564,134	\$459,656	\$5,488	\$69	\$4,237	\$5,948	\$1,567	\$2,668	\$10,026
512	BOILER PLANT	1	\$9,131,559	\$1,911,016	\$6,525	\$833,265	\$7,808	\$826,206	\$1,231,226	\$49,160	\$440,426	\$1,178,435	\$1,415,904	\$1,153,677	\$16,283	\$173	\$10,634	\$14,929	\$3,932	\$6,696	\$25,164
513	ELECTRIC PLANT	1	\$4,148,763	\$868,236	\$2,964	\$378,580	\$3,593	\$375,372	\$559,386	\$22,335	\$200,100	\$535,401	\$643,291	\$524,153	\$7,398	\$79	\$4,832	\$6,783	\$1,787	\$3,042	\$11,433
514	MISCELLANEOUS STEAM PLANT	1	\$1,588,388	\$332,411	\$1,135	\$144,942	\$1,376	\$143,714	\$214,165	\$8,551	\$76,610	\$204,983	\$246,289	\$200,676	\$2,832	\$30	\$1,850	\$2,597	\$684	\$1,165	\$4,377
Total Steam Production - Maintenance			\$22,291,731	\$4,665,123	\$15,927	\$2,034,149	\$19,305	\$2,016,912	\$3,005,636	\$120,008	\$1,075,157	\$2,876,765	\$3,456,468	\$2,816,328	\$39,749	\$422	\$25,960	\$36,445	\$9,600	\$16,346	\$61,430
Total Steam			\$53,078,284	\$11,108,008	\$37,924	\$4,843,460	\$45,968	\$4,802,419	\$7,156,646	\$285,747	\$2,560,030	\$6,849,793	\$8,230,109	\$6,705,887	\$94,646	\$1,005	\$61,813	\$86,778	\$22,858	\$38,922	\$146,269
Hydraulic Production - Operation																					
535	SUPERVISION AND ENGINEERING	53	\$24,283	\$5,082	\$17	\$2,216	\$21	\$2,197	\$3,274	\$131	\$1,171	\$3,134	\$3,765	\$3,068	\$43	\$0	\$28	\$40	\$10	\$18	\$67
538	ELECTRIC EXPENSES	1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
539	MISCELLANEOUS HYDRO POWER EXP	1	\$1,669	\$349	\$1	\$152	\$1	\$151	\$225	\$9	\$81	\$215	\$259	\$211	\$3	\$0	\$2	\$3	\$1	\$1	\$5
Total Hydraulic Production - Operation			\$25,952	\$5,431	\$19	\$2,368	\$22	\$2,348	\$3,499	\$140	\$1,252	\$3,349	\$4,024	\$3,279	\$46	\$0	\$30	\$42	\$11	\$19	\$72
Hydraulic Production - Maintenance																					
541	SUPERVISION AND ENGINEERING	1	\$1,076	\$225	\$1	\$98	\$1	\$97	\$145	\$8	\$52	\$139	\$167	\$136	\$2	\$0	\$1	\$2	\$0	\$1	\$3
542	STRUCTURES	1	\$482,610	\$100,999	\$345	\$44,039	\$418	\$43,696	\$65,071	\$2,598	\$23,277	\$62,281	\$74,832	\$60,973	\$861	\$9	\$562	\$789	\$208	\$354	\$1,330
543	RESERV. DAMS & WATERWAYS	1	\$250,322	\$52,386	\$179	\$22,842	\$217	\$22,649	\$33,751	\$1,348	\$12,073	\$32,304	\$38,814	\$31,626	\$446	\$5	\$292	\$409	\$108	\$184	\$690
544	ELECTRIC PLANT	1	\$57,492	\$12,032	\$41	\$5,246	\$50	\$5,202	\$7,752	\$310	\$2,773	\$7,419	\$8,914	\$7,264	\$103	\$1	\$67	\$84	\$25	\$42	\$158
545	MISC. HYDRO PLANT	1	\$565	\$118	\$0	\$52	\$0	\$51	\$76	\$3	\$27	\$73	\$88	\$71	\$1	\$0	\$1	\$1	\$0	\$0	\$2
Total Hydraulic Production - Maintenance			\$792,065	\$165,760	\$566	\$72,277	\$686	\$71,665	\$105,795	\$4,264	\$38,202	\$102,217	\$122,815	\$100,069	\$1,412	\$15	\$922	\$1,295	\$341	\$581	\$2,183
Total Hydraulic			\$818,018	\$171,191	\$584	\$74,645	\$708	\$74,013	\$110,295	\$4,404	\$39,454	\$105,566	\$126,839	\$103,348	\$1,459	\$15	\$953	\$1,337	\$352	\$600	\$2,254
Other Power Generation - Operations																					
547	FUEL		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
548	GENERATION EXPENSE	1	\$484,119	\$101,314	\$346	\$44,176	\$419	\$43,802	\$65,275	\$2,606	\$23,350	\$62,476	\$75,066	\$61,163	\$863	\$9	\$564	\$791	\$208	\$355	\$1,334
Total Other Power Generation - Operations			\$484,119	\$101,314	\$346	\$44,176	\$419	\$43,802	\$65,275	\$2,606	\$23,350	\$62,476	\$75,066	\$61,163	\$863	\$9	\$564	\$791	\$208	\$355	\$1,334
Other Power Generation - Maintenance																					
551	SUPERVISION AND ENGINEERING	1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
552	STRUCTURES	1	\$329	\$69	\$0	\$30	\$0	\$30	\$44	\$2	\$16	\$42	\$51	\$42	\$1	\$0	\$0	\$1	\$0	\$0	\$1
553	GEN. ELECTRIC PLANT	1	\$198,562	\$41,854	\$142	\$18,119	\$172	\$17,965	\$25,772	\$1,069	\$9,577	\$25,625	\$30,788	\$25,086	\$354	\$4	\$231	\$325	\$88	\$148	\$547
554	MISC. OTHER PWR GEN. PLANT	1	\$5,167	\$1,081	\$4	\$472	\$4	\$468	\$697	\$28	\$249	\$667	\$801	\$653	\$9	\$0	\$6	\$8	\$2	\$4	\$14
555	PURCHASED POWER		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
556	SYSTEM CONTROL AND LOAD DISPATCH	1	\$494,027	\$103,368	\$353	\$45,081	\$428	\$44,699	\$66,611	\$2,660	\$23,827	\$63,755	\$76,602	\$62,415	\$881	\$9	\$575	\$808	\$213	\$362	\$1,361
557	OTHER EXPENSES	1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Other Power Generation - Maintenance			\$698,085	\$146,092	\$499	\$63,701	\$605	\$63,161	\$94,124	\$3,758	\$33,669	\$80,088	\$108,242	\$88,196	\$1,245	\$13	\$813	\$1,141	\$301	\$512	\$1,924
Total Other			\$1,182,203	\$247,407	\$845	\$107,878	\$1,024	\$106,963	\$159,399	\$6,364	\$57,019	\$152,564	\$183,308	\$149,359	\$2,108	\$22	\$1,377	\$1,933	\$509	\$867	\$3,258
Transmission Operation Expenses																					
560	SUPERVISION & ENGINEERING	43	\$878,278	\$218,482	\$719	\$89,141	\$906	\$91,740	\$115,160	\$3,561	\$36,353	\$115,595	\$110,780	\$88,804	\$1,435	\$13	\$873	\$1,177	\$302	\$282	\$2,954
561	LOAD DISPATCHING	2	\$5,098,545	\$1,268,322	\$4,174	\$517,477	\$5,262	\$532,565	\$668,521	\$20,674	\$211,038	\$671,050	\$843,094	\$515,521	\$8,335	\$77	\$5,067	\$6,833	\$1,750	\$1,838	\$17,147
562	STATION EXPENSES	2	\$914,691	\$227,540	\$749	\$92,837	\$844	\$95,543	\$119,934	\$3,709	\$37,860	\$120,388	\$115,373	\$92,486	\$1,495	\$14	\$909	\$1,226	\$314	\$294	\$3,076
563	OVERHEAD LINES	2	\$238,932	\$59,437	\$196	\$24,250	\$247	\$24,958	\$31,329	\$989	\$9,890	\$31,447	\$30,137	\$24,159	\$391	\$4	\$237	\$320	\$82	\$77	\$804
564	UNDERGROUND LINES	2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
565	TRANSM. OF ELECTRICITY BY OTHERS	2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
566	MISC. TRANSM. EXPENSE	42	\$1,131,296	\$281,423	\$826	\$114,821	\$1,168	\$118,169	\$148,335	\$4,587	\$46,826	\$148,897	\$142,694	\$114,387	\$1,850	\$17	\$1,124	\$1,516	\$388	\$363	\$3,805
567	RENTS	42	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Transmission Operation Expenses			\$8,261,742	\$2,055,204	\$6,764	\$838,525	\$8,526	\$862,975	\$1,083,279	\$39,500	\$341,966	\$1,087,377	\$1,042,078	\$835,356	\$13,507	\$125	\$8,211	\$11,072	\$2,836	\$2,654	\$27,786







NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Probability of Dispatch CCROSS  
Allocation Percentages

Name	No.	Description	Total	Residential Rate 711	C&G Heat Pump Rate 720	GS Small Rate 721	Comm. SH Rate 722	GS Medium Rate 723	GS Large Rate 724	Metal Melting Rate 725	Off-Peak Serv. Rate 726	Ind. Pwr. Serv. Rate 732	HLF Ind. Pwr. Serv. Rate 733	Air Separation Rate 734	Muni. Power Rate 741	Int. WW Pumping Rate 742	Railroad Rate 744	Street Lighting Rate 750	Traffic Lighting Rate 755	Dusk-to- Dawn Rate 760	Interdept.
External	1	Test Year Probability of Dispatch	100.0000%	20.9276%	0.0715%	9.1251%	0.0866%	9.0478%	13.4832%	0.5384%	4.8231%	12.9051%	15.5056%	12.6340%	0.1783%	0.0019%	0.1165%	0.1635%	0.0431%	0.0733%	0.2756%
External	2	12 CP @ Transmission	100.0000%	24.8762%	0.0819%	10.1495%	0.1032%	10.4454%	13.1120%	0.4055%	4.1392%	13.1616%	12.6139%	10.1111%	0.1635%	0.0015%	0.0994%	0.1340%	0.0343%	0.0321%	0.3363%
External	3	NCP @ Sub-Transmission	100.0000%	44.1664%	0.2664%	14.1233%	0.2732%	14.7494%	15.4168%	0.7594%	4.2499%	2.9842%	0.7111%	0.0000%	0.7516%	0.0014%	0.2595%	0.5045%	0.0313%	0.1179%	0.6336%
External	4	NCP @ Primary	100.0000%	46.5289%	0.2806%	14.8515%	0.2878%	15.5354%	15.5622%	0.6130%	4.1911%	0.0000%	0.0000%	0.0000%	0.7918%	0.0014%	0.0000%	0.5315%	0.0330%	0.1242%	0.8675%
External	5	NCP12 @ Secondary	100.0000%	49.1165%	0.1560%	18.9537%	0.1952%	17.1193%	8.4062%	0.2910%	3.4372%	0.0000%	0.0000%	0.0000%	0.6294%	0.0024%	0.0000%	0.8408%	0.0538%	0.2003%	0.5981%
External	6	Customer Station - Tran.	100.0000%	0.0000%	0.0000%	9.1603%	0.0000%	0.0000%	37.4046%	0.0000%	4.5802%	22.9008%	21.3740%	4.5802%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
External	7	Customer Station - Sub-Tran.	100.0000%	0.0000%	0.0000%	13.7931%	0.0000%	3.4483%	48.2759%	3.4483%	13.7931%	13.7931%	3.4483%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
External	8	Railroad Direct	100.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	100.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	
External	9	KW Billing Determinants	100.0000%	0.0000%	0.0000%	0.0000%	0.0000%	17.4861%	21.0315%	0.4280%	6.2487%	25.5164%	18.0663%	10.9383%	0.0000%	0.0000%	0.2845%	0.0000%	0.0000%	0.0000%	0.0000%
External	10	No. of Customers	100.0000%	86.0000%	0.6312%	10.8037%	0.0524%	0.7823%	0.0909%	0.0013%	0.0304%	0.0012%	0.0012%	0.1453%	0.0017%	0.0002%	0.1902%	0.0297%	1.8080%	0.0098%	0.0000%
External	11	Serv. of Customers	100.0000%	89.5976%	0.6268%	9.2815%	0.0451%	0.6721%	0.0781%	0.0000%	0.0032%	0.0001%	0.0002%	0.0000%	0.1745%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
External	12	Meters (Wtd Cust)	100.0000%	67.3161%	0.2453%	23.4057%	0.2171%	5.8098%	1.1139%	0.0102%	0.2614%	0.7145%	0.3686%	0.2832%	0.4531%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0213%
External	13	Transformer (Wtd Cust)	100.0000%	59.8275%	0.1030%	35.6854%	0.1732%	2.5840%	0.3003%	0.0172%	0.5737%	0.0010%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.1270%	0.0042%	0.0665%	0.0324%
External	14	Direct to Dusk-to-Dawn	100.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	100.0000%	0.0000%	
External	15	Street and Traffic Lighting	100.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	98.1835%	1.9811%	0.0000%	0.0000%
External	16	Manual Meter Reading	100.0000%	88.6615%	0.0170%	5.6171%	0.0294%	4.2371%	0.4898%	0.0000%	0.1551%	0.2740%	0.3523%	0.1615%	0.0000%	0.0004%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
External	17	Grand Meter Reading	100.0000%	8.4469%	3.8518%	11.7568%	0.0000%	17.4427%	36.6333%	0.6588%	15.4408%	2.5990%	1.4523%	0.7147%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
External	18	AMR Meter Reading	100.0000%	87.9547%	0.0222%	11.0178%	0.0536%	0.7648%	0.0191%	0.0000%	0.0000%	0.0000%	0.0000%	0.1477%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	
External	19	Customer Records & Collections	100.0000%	80.2448%	0.0945%	13.5284%	0.1278%	1.4924%	1.4987%	1.4343%	0.5120%	0.7946%	0.8234%	0.5791%	0.1063%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	
External	20	Customer Service and Information	100.0000%	63.4787%	0.1352%	12.7755%	0.0384%	5.2593%	6.3657%	1.4516%	2.3471%	3.1935%	2.6526%	1.5400%	0.5106%	0.1277%	0.1266%	0.0000%	0.0000%	0.0000%	
External	21	Secondary Customers w/ Lighting at 0.25x, RR at 2x	100.0000%	84.2733%	0.0303%	10.5168%	0.0514%	0.7437%	0.0489%	0.0008%	0.0232%	0.0000%	0.0000%	0.0000%	0.1413%	0.0017%	0.0019%	3.3033%	0.0668%	0.7871%	
External	22	Customer Charge Billing Determinants	100.0000%	75.5659%	0.0148%	9.4203%	0.0263%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0015%	0.0000%	11.7940%	0.2351%	2.9411%	
External	23	MWH Sales	100.0000%	20.0571%	0.0728%	8.6783%	0.0885%	8.6733%	12.8280%	0.5573%	5.0881%	13.4816%	16.2327%	13.1252%	0.1716%	0.0020%	0.1212%	0.3412%	0.0444%	0.0813%	
External	24	Energy at Source	100.0000%	20.1833%	0.0732%	8.7297%	0.0890%	8.7235%	12.8530%	0.5576%	5.1034%	13.3992%	16.2182%	13.0387%	0.1726%	0.0020%	0.1207%	0.3434%	0.0447%	0.0818%	
External	25	KWH Sales	100.0000%	20.0571%	0.0728%	8.6783%	0.0885%	8.6733%	12.8280%	0.5573%	5.0881%	13.4816%	16.2327%	13.1252%	0.1716%	0.0020%	0.1212%	0.3412%	0.0444%	0.0813%	
External	26	Interdepartmental	100.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%		
External	27	TSD Plant in Service	100.0000%	45.8938%	0.1488%	14.3459%	0.1597%	9.3625%	10.2177%	0.3505%	2.9808%	4.9388%	4.6125%	3.4961%	0.4014%	0.0012%	0.2043%	2.0226%	0.0600%	0.4628%	
External	28	Energy at Source	100.0000%	20.1833%	0.0732%	8.7297%	0.0890%	8.7235%	12.8530%	0.5576%	5.1034%	13.3992%	16.2182%	13.0387%	0.1726%	0.0020%	0.1207%	0.3434%	0.0447%	0.0818%	
External	29	Book Margin w/o InterDept	100.0000%	31.5883%	0.0463%	15.3759%	0.0805%	11.6010%	13.5759%	0.3318%	4.2982%	7.5947%	9.7660%	4.4775%	0.2145%	0.0106%	0.1355%	0.6627%	0.0545%	0.1723%	
External	30	Net Late Charges & Credits	100.0000%	69.2964%	0.0543%	17.7373%	0.0864%	5.3442%	5.6205%	0.0884%	1.4257%	0.0000%	0.0000%	0.0000%	0.0023%	0.0057%	0.0000%	0.0000%	0.0000%	0.3365%	
External	31	Retail Sales Allocator	100.0000%	31.5364%	0.0464%	15.3542%	0.0804%	11.5820%	13.5536%	0.3313%	4.2911%	7.5822%	9.7500%	4.4701%	0.2142%	0.0106%	0.1355%	0.6616%	0.0543%	0.1720%	
External	32	Energy at Source	100.0000%	20.1833%	0.0732%	8.7297%	0.0890%	8.7235%	12.8530%	0.5576%	5.1034%	13.3992%	16.2182%	13.0387%	0.1726%	0.0020%	0.1207%	0.3434%	0.0447%	0.0818%	
External	33	Fuel Revenue	100.0000%	19.8704%	0.0668%	8.6191%	0.0827%	8.6647%	12.8260%	0.5595%	5.0660%	13.6211%	16.3020%	13.3801%	0.1735%	0.0019%	0.1195%	0.3365%	0.0442%	0.0801%	
External	34	Off System Sales	100.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%		
External	35	Rate of Return	2000.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	100.0000%	
Internal	36	Production, Transmission & Distribution Plant	0	100.0000%	20.9276%	0.0997%	11.2276%	0.1165%	9.2379%	12.3109%	0.4684%	4.1270%	8.8449%	11.2952%	0.9954%	0.2696%	0.0016%	0.1538%	0.8989%	0.0499%	
Internal	37	Production Plant	0	100.0000%	20.9276%	0.0715%	9.1251%	0.0856%	9.0478%	13.4832%	0.5384%	4.8231%	12.9051%	15.5056%	12.6340%	0.1783%	0.0019%	0.1165%	0.1635%	0.0431%	
Internal	38	Distribution Plant excludes directs	0	100.0000%	56.2450%	0.1711%	17.0376%	0.1904%	8.8496%	8.7029%	0.3089%	2.3520%	0.6315%	0.5431%	0.1234%	0.5323%	0.0010%	0.0002%	3.2356%	0.0777%	
Internal	39	All Distribution Plant	0	100.0000%	55.3694%	0.1764%	16.8174%	0.1949%	9.0872%	0.3354%	2.4609%	0.7724%	0.5519%	0.1156%	0.5442%	0.0010%	0.2719%	3.0619%	0.0747%	0.6197%	
Internal	40	Total General Plant	0	100.0000%	35.6752%	0.1814%	11.0206%	0.1133%	8.4877%	11.3735%	0.4305%	3.8986%	8.6467%	9.8644%	7.9780%	0.2457%	0.0017%	0.1315%	1.1239%	0.0517%	
Internal	41	Transmission & Distribution Plant	0	100.0000%	44.7309%	0.1434%	14.4911%	0.1629%	10.4944%	0.3599%	3.0464%	5.0948%	4.7599%	3.6029%	0.4114%	0.0012%	0.2117%	2.0404%	0.0609%	0.4147%	
Internal	42	Transmission Plant	0	100.0000%	24.8762%	0.0819%	10.1495%	0.1032%	10.4454%	13.1120%	0.4055%	4.1392%	13.1616%	12.6139%	10.1111%	0.1635%	0.0015%	0.0994%	0.1340%	0.0343%	
Internal	43	Transmission Operations Labor (really O&M not labor)	0	100.0000%	24.8762%	0.0819%	10.1495%	0.1032%	10.4454%	13.1120%	0.4055%	4.1392%	13.1616%	12.6139%	10.1111%	0.1635%	0.0015%	0.0994%	0.1340%	0.0343%	
Internal	44	Distribution Operations Labor (really O&M not labor)	0	100.0000%	52.7812%	0.1941%	16.2536%	0.1955%	8.2607%	6.9539%	0.2588%	1.8692%	0.5977%	0.3206%	0.1165%	0.5005%	0.0008%	0.1979%	7.7082%	1.8523%	
Internal	45	Distribution Maintenance Labor (really O&M not labor)	0	100.0000%	61.6129%	0.1682%	13.0926%	0.1819%	8.8755%	8.6319%	0.3527%	2.3437%	0.2836%	0.0754%	0.0025%	0.5010%	0.0015%	0.1130%	2.9167%	0.0712%	
Internal	46	Customer Accounts Excluding Uncollectibles and Services	0	100.0000%	69.8428%	0.8594%	13.0651%	0.1027%	3.8578%	7.1866%	0.2106%	2.7380%	1.0069%	0.8549%	0.5547%	0.1535%	0.0008%	0.1324%	0.0000%	0.0000%	
Internal	47	Labor Expense (excluding A&G labor)	0	100.0000%	35.																

NORTHERN INDIANA PUBLIC SERVICE COMPANY  
Development of Energy and Demand  
Separation for the Base-Intermediate-Peak Method

Plant Name	Type	(1) Generator Nameplate (MW) 1/	(2) Test Year Net MWH 2/	(3) Actual TY Capacity Factor 3/	(4) Utilized Capacity Factor	(5) Test Year Fuel Cost Per MWH 4/	(6) Gross Plant Investment (\$000) 5/	(7) Cost Per KW	(8) Percent Energy	(9) Weighted Energy
<b>Bailey Coal</b>										
Bailey #7	Steam/Coal	190.4	790,127	47.37%	47.37%	\$27.41				
Bailey #8	Steam/Coal	<u>413.1</u>	<u>1,255,724</u>	34.70%	34.70%	\$26.68				
Total Bailey Steam		603.5	2,045,921	38.70%	38.70%	\$26.96	\$636,190,256	\$1,054		
ECR-17 Environmental 7/							\$139,710,219		100.00%	\$139,710,219
ECR-26 Environmental (Excl. CWIP) 8/							\$31,885,710		100.00%	\$31,885,710
Non-Identified Environmental					38.70%		\$464,594,327		38.70%	\$179,796,562
<b>Michigan City Coal</b>										
Michigan City #12	Steam/Coal	540.0	2,490,503	52.65%	52.65%	\$28.62	\$440,808,400	\$816		
ECR-17 Environmental 7/							\$68,570,811		100.00%	\$68,570,811
ECR-26 Environmental (Excl. CWIP) 8/							\$3,773,389		100.00%	\$3,773,389
Non-Identified Environmental					52.65%		\$368,464,200		52.65%	\$193,992,304
<b>Schahfer Coal</b>										
Schahfer #14	Steam/Coal	540.0	876,577	18.53%	52.00% 6/	\$36.21				
Schahfer #15	Steam/Coal	556.4	2,088,155	42.84%	42.84%	\$30.35				
Schahfer #17	Steam/Coal	423.5	2,148,870	57.92%	57.92%	\$28.17				
Schahfer #18	Steam/Coal	<u>423.5</u>	<u>1,910,547</u>	<u>51.50%</u>	<u>51.50%</u>	<u>\$27.47</u>				
Total Schahfer Steam		1,943.4	7,024,149	41.26%	50.56%	\$29.63	\$2,496,839,265	\$1,285		
ECR-17 Environmental 7/							\$133,351,543		100.00%	\$133,351,543
ECR-26 Environmental (Excl. CWIP) 8/							\$551,494,236		100.00%	\$551,494,236
Non-Identified Environmental					50.56%		\$1,811,993,486		50.56%	\$916,143,907
<b>Sugar Creek Gas</b>										
Sugar Creek #1A	Gas	203.2								
Sugar Creek #1B	Gas	203.2								
Sugar Creek Steam Turbine	Gas	<u>213.4</u>								
Total Sugar Creek Gas		619.8	2,674,913	49.27%	49.27%	\$26.17	\$132,510,458	\$214	49.27%	\$65,283,606
<b>Schahfer Gas</b>										
Schahfer #16A	CT Gas	129.0	4,264	0.38%		\$92.40				
Schahfer #16B	CT Gas	<u>129.0</u>	<u>3,597</u>	<u>0.32%</u>		<u>\$76.94</u>				
Total Schahfer CT Gas		258.0	7,861	0.35%	0.35%	\$85.33	\$40,327,014	\$156	0.35%	\$140,265
<b>Bailey Gas</b>										
Bailey #10	CT Gas	<u>37.5</u>	<u>716</u>	<u>0.22%</u>		<u>\$92.40</u>	<u>\$8,481,784</u>			
Total Bailey CT Gas		37.5	716	0.22%	0.22%	\$92.40	\$8,481,784	\$226	0.22%	\$18,487
Norway	Hydro	7.2	18,145	28.77%	--	\$0.00	\$10,712,692	\$1,488	100.00%	\$10,712,692
Oakdale	Hydro	9.2	17,311	21.48%	--	\$0.00	\$21,567,260	\$2,344	100.00%	\$21,567,260
							Total Gross Plt	\$3,787,437,129		
							Total Energy	\$2,316,440,991		
							PCT Energy	61.16%		
							PCT Demand	38.84%		

1/ Per Company response to OUCC-9-007, Attachment B.

2/ Per Company response to OUCC-9-007, Attachment A (Corrected).

3/ Calculated as: [Column (2) divided by 8,760] divided by Column (1).

4/ Per Company response to OUCC-9-012, Attachment A.

5/ Per NTPSCO 2014 FERC Form 1 (revised).

6/ Per Direct Testimony of Michael Hooper, page 23.

7/ Per Cause No. 42150-ECR-17, Exhibit 3, Schedules 1 and 1A.

8/ Per OUCC Informal Data Request 2-001.









**NORTHERN INDIANA PUBLIC SERVICE COMPANY**  
**Current and NIPSCO Proposed Revenues**

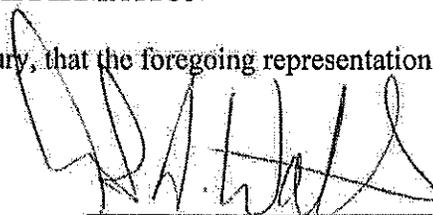
Rate Class	Current Rate Code	Current Revenue			NIPSCO Proposed Increase Including Riders			
		Actual Revenue Including Riders	Interruptible Credit Offset	Net of Interruptible Credit	NIPSCO Proposed Revenue Including Riders	Amount	Percent Before Interruptible Credit Offset	Percent Net Of Interruptible Credit Offset
<b>Rate Revenue</b>								
Residential	Rate 611	\$ 433,840,509	\$ (8,803,701)	\$ 425,036,808	\$ 479,340,094	\$ 54,303,286	12.52%	12.78%
Commercial and General Service - Heat Pump	Rate 620	\$ 838,466	\$ (29,606)	\$ 808,860	\$ 916,984	\$ 108,124	12.90%	13.37%
General Service - Small	Rate 621	\$ 205,612,924	\$ (3,637,874)	\$ 201,975,051	\$ 218,879,105	\$ 16,904,054	8.22%	8.37%
Commercial Spaceheating	Rate 622	\$ 1,276,134	\$ (37,015)	\$ 1,239,119	\$ 1,330,702	\$ 91,583	7.18%	7.39%
General Service - Medium	Rate 623	\$ 166,602,223	\$ (3,719,730)	\$ 162,882,493	\$ 178,406,075	\$ 15,523,581	9.32%	9.53%
General Service - Large	Rate 624	\$ 209,249,933	\$ (4,845,977)	\$ 204,403,956	\$ 221,548,155	\$ 17,144,199	8.19%	8.39%
Metal Melting Service	Rate 625	\$ 6,422,934	\$ (164,728)	\$ 6,258,206	\$ 6,805,200	\$ 546,994	8.52%	8.74%
Off-Peak Service	Rate 626	\$ 71,595,733	\$ (1,626,890)	\$ 69,968,843	\$ 75,300,358	\$ 5,331,515	7.45%	7.62%
Industrial Power Service	Rate 632	\$ 151,342,967	\$ 13,823,856	\$ 165,166,823	\$ 174,468,791	\$ 9,301,968	6.15%	5.63%
High Load Factor Industrial Power Service	Rate 633	\$ 188,158,466	\$ (5,019,533)	\$ 183,138,934	\$ 189,275,217	\$ 6,136,283	3.26%	3.35%
Industrial Power Service for Air Separation & Hydrogen Prod.	Rate 634	\$ 117,677,346	\$ 14,380,126	\$ 132,057,472	\$ 149,759,156	\$ 17,701,684	15.04%	13.40%
Municipal Power	Rate 641	\$ 3,151,305	\$ (61,565)	\$ 3,089,740	\$ 3,436,856	\$ 347,117	11.02%	11.23%
Intermittent Wastewater Pumping	Rate 642	\$ 120,372	\$ (603)	\$ 119,769	\$ 120,986	\$ 1,217	1.01%	1.02%
Railroad Power Service	Rate 644	\$ 2,042,981	\$ (38,891)	\$ 2,004,090	\$ 2,171,533	\$ 167,443	8.20%	8.36%
Streetlighting	Rate 650	\$ 8,674,398	\$ (69,216)	\$ 8,605,182	\$ 9,258,218	\$ 653,037	7.53%	7.59%
Traffic and Directive Lighting	Rate 655	\$ 904,881	\$ (13,711)	\$ 891,170	\$ 934,302	\$ 43,132	4.77%	4.84%
Dusk to Dawn Area Lighting	Rate 660	\$ 2,215,773	\$ (16,546)	\$ 2,199,227	\$ 2,411,637	\$ 212,410	9.59%	9.66%
Interdepartmental	Interdepart.	\$ 2,699,701	\$ (118,399)	\$ 2,581,302	\$ 5,617,132	\$ 3,035,830	112.45%	117.61%
<b>TOTAL RATE REVENUE</b>		\$ 1,572,427,045	\$ -	\$ 1,572,427,045	\$ 1,719,980,501	\$ 147,553,456	9.38%	9.38%
<b>Other Revenue (Allocated)</b>		\$ 36,819,653	\$ -	\$ 36,819,653	\$ 36,819,653	\$ -	0.00%	0.00%
<b>TOTAL REVENUE</b>		\$ 1,609,246,698	\$ -	\$ 1,609,246,698	\$ 1,756,800,154	\$ 147,553,456	9.17%	9.17%

**NORTHERN INDIANA PUBLIC SERVICE COMPANY**  
**Customer Cost Analysis**

	Residential	Sm. Comm. Combined (Rates 620, 621, & 622)	
<b>Gross Plant</b>			
369 Services	\$184,553,292	\$19,266,038	
370 Meters	\$54,575,575	\$19,350,721	
<b>Total Gross Plant</b>	<b>\$239,128,867</b>	<b>\$38,616,759</b>	
<b>Depreciation Reserve</b>			
Services	-\$165,794,753	-\$17,307,781	
Meters	-\$6,254,192	-\$2,217,533	
<b>Total Depreciation Reserve</b>	<b>-\$172,048,944</b>	<b>-\$19,525,314</b>	
<b>Total Net Plant</b>	<b>\$67,079,923</b>	<b>\$19,091,445</b>	
<b>Operation &amp; Maintenance Expenses</b>			
586 Dist Oper - Meter	\$1,991,190	\$706,011	
902 Meter Reading Manual	\$199,340	\$368,351	
902 Meter Reading AMR	\$1,062,091	\$133,945	
903 Records & Collections	\$9,609,351	\$1,646,771	
<b>Total O &amp; M Expenses</b>	<b>\$12,861,971</b>	<b>\$2,855,078</b>	
<b>Depreciation Expense</b>			
Services	\$1,236,434	\$129,075	
Meters	\$3,979,253	\$1,410,913	
<b>Total Depreciation Expense</b>	<b>\$5,215,686</b>	<b>\$1,539,988</b>	
<b>Revenue Requirement</b>			
Interest	\$1,589,794	\$452,467	
Equity return	\$4,212,619	\$1,198,943	
State Income Taxes	\$323,175	\$91,978	
Income Tax	\$2,094,316	\$596,058	
Revenue For Return	8,219,905	2,339,446	
O & M Expenses	\$12,861,971	\$2,855,078	
Depreciation Expense	\$5,215,686	\$1,539,988	
Subtotal Customer Revenue Requirement	\$26,297,562	\$6,734,512	
<b>Total Revenue Requirement</b>	<b>\$26,297,562</b>	<b>\$6,734,512</b>	
Number of Customers	402,973	51,001	
Number of Bills	4,835,676	612,010	
Monthly Cost Before Bad Debts & Utility Receipts Tax	\$5.44	\$11.00	
Bad Debts + Utility Receipts Tax Rate	1.5217%	1.5217%	
<b>TOTAL MONTHLY CUSTOMER COST</b>	<b>\$5.52</b>	<b>\$11.17</b>	
	<b>% of Total</b>	<b>Cost Rate</b>	<b>Wgtd. Cost</b>
Debt	41.56%	5.71%	2.37%
Equity	58.44%	10.75%	6.28%
Total	100.00%		8.65%

**AFFIRMATION**

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



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Glenn A. Watkins  
Consultant for  
Indiana Office of Utility Consumer Counselor

January 22, 2016  
Date

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Cause No. 44688  
NIPSCO