

**DIRECT TESTIMONY OF  
CHRISTINE E. SMITH  
PRODUCT AND SERVICES MANAGER  
DUKE ENERGY CAROLINAS LLC  
ON BEHALF OF DUKE ENERGY INDIANA, INC.  
CAUSE NO. 44578 BEFORE THE  
INDIANA UTILITY REGULATORY COMMISSION**

**I. INTRODUCTION**

1  
2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Christine E. Smith and my business address is 400 South Tryon Street,  
4 Charlotte, North Carolina 28202.

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

6 A. I am employed as Product and Services Manager of Direct Offer Programs by Duke  
7 Energy Carolinas LLC. Duke Energy Carolinas LLC is a wholly owned, indirect  
8 subsidiary of Duke Energy Corporation. Duke Energy Indiana, Inc. ("Duke Energy  
9 Indiana" or "Company") is a wholly owned, indirect subsidiary of Duke Energy  
10 Corporation.

11 **Q. WHAT ARE YOUR RESPONSIBILITIES AS PRODUCT AND SERVICES  
12 MANAGER?**

13 A. As Product and Services Manager, I am responsible for the delivery of renewable and  
14 energy efficiency programs for all Duke Energy Corporation regulated entities, except  
15 Duke Energy Florida. In this role, I manage the marketing and operations of the  
16 programs.

**CHRISTINE E. SMITH**

-1-

1 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**  
2 **BACKGROUND.**

3 A. I have a background in business and marketing, with expertise in marketing strategy,  
4 business development and customer relationship management. I received a Bachelor of  
5 Arts (B.A.) in Economics from the University of North Carolina at Chapel Hill and a  
6 Masters in Business Administration (M.B.A.) from Wake Forest University. I started my  
7 career in financial services at two (2) large international banks, working in New York and  
8 London from 1992 to 2000. In 2002, I founded a marketing and distribution business  
9 working with several British based companies to develop their U.S. expansion. Since  
10 starting at Duke Energy in 2008, I have held various responsibilities in program  
11 management and new product development. Since 2009, I have been responsible for the  
12 business, regulatory and marketing aspects of GoGreen Indiana and managed the product  
13 life cycle for GoGreen through regulatory updates, renewal of Tariffs and price reduction  
14 enhancements.

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16 A. The purpose of my Testimony is to explain and support the Company's request for  
17 flexibility to consider the inclusion of Renewable Energy Credits ("RECs") from Duke  
18 Energy Indiana's solar Power Purchase Agreements ("PPAs"), at issue in this proceeding,  
19 in the Indiana GoGreen program for the benefit of customers participating in that  
20 program.

21 **Q. PLEASE EXPLAIN THE GOGREEN PROGRAM.**

1 A. Starting in 2001, Duke Energy Indiana's predecessor company offered customers the  
2 opportunity to voluntarily add \$1 per month to their electric bill to support two (2)  
3 demonstration projects in Duke Energy Indiana's service territory. In 2006, the  
4 Commission approved a Settlement Agreement between Duke Energy Indiana and the  
5 Indiana Office of Utility Consumer Counselor ("OUCC"), wherein, Duke Energy Indiana  
6 received authority to create the GoGreen program. GoGreen is a voluntary customer  
7 program providing a convenient and affordable option for customers to invest in  
8 renewable energy. GoGreen Indiana customers participate in and promote green power  
9 generation, through their monthly electric utility bill, by paying \$0.90 per 100 kWh  
10 block, with a minimum two (2) block monthly purchase. The GoGreen program offers a  
11 competitively priced green power rate for retail customers by aggregating participation to  
12 purchase volume Green-e certified wind RECs on the open competitive market. The  
13 market price for RECs can fluctuate geographically for a specific type of REC and can  
14 also vary across various types of renewable generation from wind to solar. Accordingly,  
15 the collective amount of GoGreen funds received must be sufficient to purchase a load  
16 matching level of RECs and continue supporting the GoGreen service offering. Under  
17 the approved Settlement Agreement, the rate charged to GoGreen customers for  
18 renewable energy can be adjusted to reflect market conditions by adjusting the price  
19 and/or size of the green power blocks. The Company monitors contributions to fully  
20 cover the cost of the program.

21 **Q. WHAT CHANGES TO THE GOGREEN PROGRAM ARE YOU MAKING IN**  
22 **THIS FILING?**

1 A. The Company proposes to continue the GoGreen program in compliance with the terms  
2 stated in the most recent Settlement Agreement approved by the Commission. The only  
3 changes proposed are: (i) as RECs from Duke Energy Indiana's solar generation projects  
4 located in Indiana become available, the GoGreen program would have the opportunity to  
5 purchase the Duke Energy Indiana certified RECs associated with any of the four (4)  
6 PPAs in Indiana on behalf of GoGreen participants at the established market price, rather  
7 than buying national RECs from an open marketplace; (ii) Duke Energy Indiana seeks  
8 approval to file its Annual Report on GoGreen under seal to maintain the confidentiality  
9 of REC pricing per the Duke Energy Indiana PPAs at issue in this proceeding; and (iii)  
10 the Company seeks approval for pricing flexibility in the event that it becomes necessary  
11 to increase the GoGreen rate above \$0.90 in order to provide sufficient funding to offset  
12 the cost of including locally generated solar RECs in the inventory portfolio.

13 Specifically, Duke Energy Indiana seeks authority to increase the customer charge  
14 by no more than twenty-five percent (25%) with sixty (60) days advance notice to  
15 customers if such an increase is justified by demand for locally generated RECs.

16 Otherwise, there are no Tariff changes proposed at this time, provided the current  
17 program rate of \$0.90 per 100 kWh block will allow for the inclusion of Duke Energy  
18 Indiana solar RECs in the GoGreen portfolio. The Company will update the marketing  
19 messages to reflect the local renewable generation if supported by the GoGreen  
20 participants.

21 Q. **WHY ARE YOU PROPOSING THIS CHANGE AT THIS TIME?**

1 A. These changes will differentiate the GoGreen program as a program supporting local  
2 renewable energy, increase satisfaction and loyalty from its participants, provide a good  
3 market for renewable generation projects that need the support of REC buyers to get  
4 started, and generate economic benefits in Indiana. GoGreen Indiana has had modest  
5 growth over the years and to evolve the program, the next step would be to encourage  
6 customer participation and respond to the change in market conditions for renewable  
7 energy by investing in local solar renewable energy projects. (See Exhibit B-1 for  
8 GoGreen Indiana 5-year growth.)

9 Duke Energy Indiana GoGreen surveys and emails from participants indicate  
10 utility investment in renewable energy and in particular solar, is a priority for participants  
11 in the program. By adding this option, we are responding to customer demand. Adding  
12 locally generated RECs, where reasonable and feasible, will be a step forward in many  
13 ways for the program. If the changes are approved, GoGreen Indiana could offer  
14 customers the option to purchase locally generated renewable energy from solar RECs in  
15 the State of Indiana. In addition to the tangible environmental benefit, the availability of  
16 local RECs should increase customer satisfaction among the GoGreen participants. The  
17 ability to fund local renewable energy would be a significant and appealing benefit to  
18 current and new subscribers and this should increase program participation. As  
19 participation increases, there is more support for renewable energy projects in the state  
20 that provide economic and environmental benefits for all customers in the community.

21 **Q. ARE YOU SPONSORING ANY EXHIBITS IN THIS PROCEEDING?**

22 A. Yes, Petitioner's Exhibits B-1.

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**II. CONCLUSION**

2 **Q. WAS PETITIONER'S EXHIBIT B-1 PREPARED BY YOU OR AT YOUR**  
3 **DIRECTION?**

4 **A. Yes.**

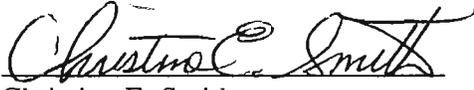
5 **Q. DOES THIS CONCLUDE YOUR PREPARED DIRECT TESTIMONY AT THIS**  
6 **TIME?**

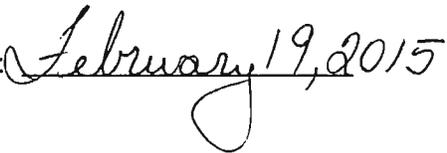
7 **A. Yes.**



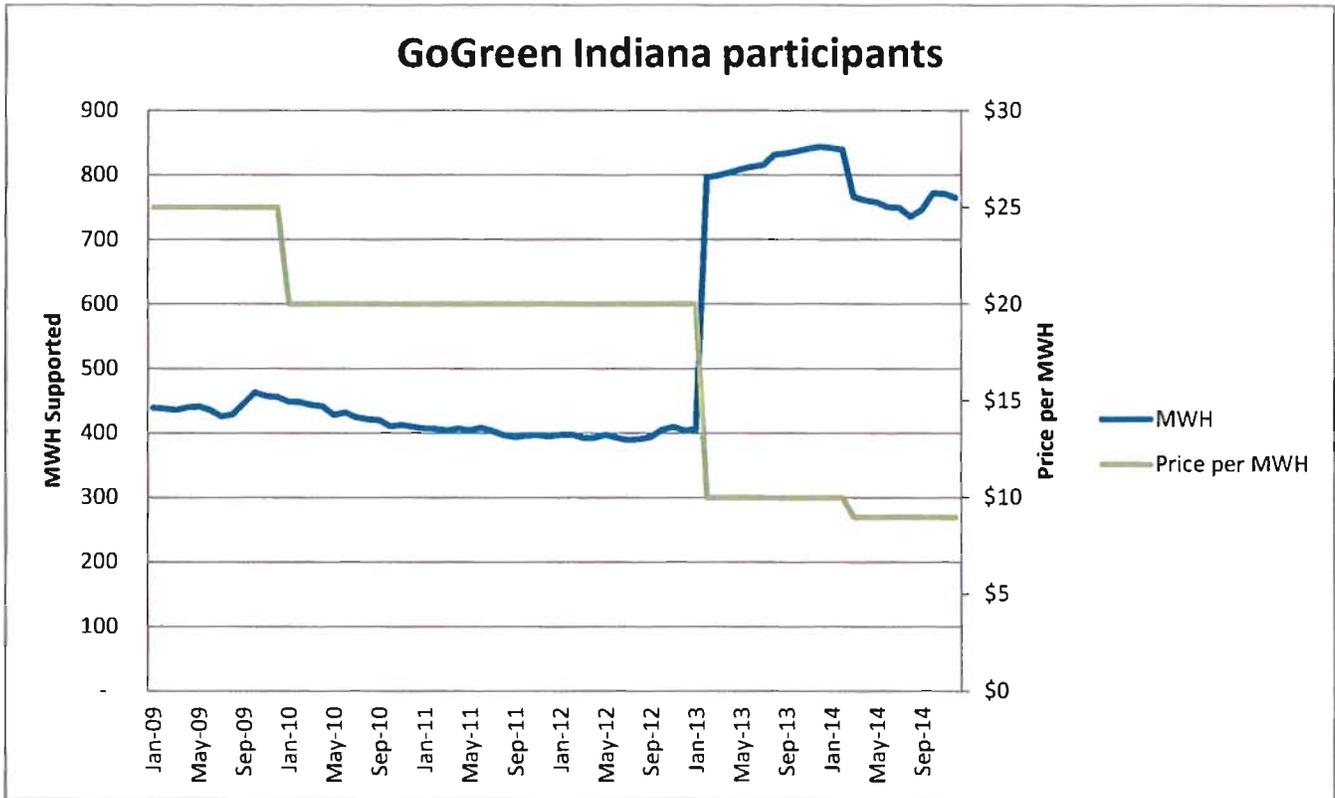
**VERIFICATION**

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

Signed:   
Christine E. Smith

Dated: 





GoGreen Indiana	Annual MWH
2009	5,309
2010	5,143
2011	4,821
2012	4,766
2013	9,431
2014	9,258