FILED May 4, 2018 INDIANA UTILITY REGULATORY COMMISSION

Petitioner's Exhibit No.4 Vectren South Page 1 of 12

SOUTHERN INDIANA GAS AND ELECTRIC COMPANY d/b/a VECTREN ENERGY DELIVERY OF INDIANA, INC. (VECTREN SOUTH)

IURC CAUSE NO. 45086

DIRECT TESTIMONY

OF

J. CAS SWIZ

DIRECTOR, RATES AND REGULATORY ANALYSIS

ON

PROPOSED RATEMAKING, ACCOUNTING TREATMENT, AND CALCULATION
OF THE REVENUE REQUIREMENT UNDER VECTREN SOUTH'S
CLEAN ENERGY COST ADJUSTMENT (CECA)

SPONSORING PETITIONER'S EXHIBIT NO. 4, ATTACHMENTS JCS-1 THROUGH JCS-2

DIRECT TESTIMONY OF J. CAS SWIZ

1	1.	INTRODUCTION					
2							
3	Q.	Please state your name and business address.					
4	A.	J. Cas Swiz					
5		One Vectren Square					
6		Evansville, Indiana 47708					
7							
8	Q.	What position do you hold with Petitioner Southern Indiana Gas and Electric					
9		Company d/b/a Vectren Energy Delivery of Indiana, Inc. ("Vectren South" or "the					
10		Company")?					
11	A.	I am Director, Rates and Regulatory Analysis of Vectren Utility Holdings, Inc. ("VUHI"),					
12		the immediate parent company of Vectren South. I hold the same position with two other					
13		utility subsidiaries of VUHI—Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery					
14		of Indiana, Inc. ("Vectren North") and Vectren Energy Delivery of Ohio, Inc. ("Vectren					
15		Ohio").					
16							
17	Q.	Please describe your educational background.					
18	A.	I am a 2001 graduate of the University of Evansville with a Bachelor of Science Degree					
19		in Accounting, and a 2005 graduate of the University of Southern Indiana with a Masters					
20		of Business Administration.					
21							
22	Q.	Please describe your professional experience.					
23	A.	From 2001 to 2003, I was employed by ExxonMobil Chemical as a Product and					
24		Inventory accountant. Since 2003, I have been employed with VUHI in various					
25		accounting capacities. In 2008, I was named Manager, Regulatory and Utility					
26		Accounting, and in November 2012, I was promoted to Director, Regulatory					
27		Implementation and Analysis. I was named to my current position in August 2015.					
28							
29	Q.	What are your present duties and responsibilities as Director, Rates and					
30		Regulatory Analysis?					
31	A.	I am responsible for the regulatory and rate matters of the regulated utilities within VUHI					

in proceedings before the Indiana and Ohio utility regulatory commissions. I also have

responsibility for the financial analysis and implementation of all regulatory initiatives for VUHI's utility subsidiaries, as well as, the preparation of accounting exhibits submitted in various regulatory proceedings.

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- 5 Q. Are you familiar with the books, records, and accounting procedures of Vectren South?
- 7 A. Yes, I am.

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- 9 Q. Are Vectren South's books and records maintained in accordance with the
 10 Uniform System of Accounts ("USOA") and Generally Accepted Accounting
 11 Principles ("GAAP")?
- 12 A. Yes.

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- 14 Q. Have you previously testified before this Commission?
- 15 Α. Yes. I have testified before the Indiana Utility Regulatory Commission ("Commission") 16 on behalf of Vectren South and Vectren North in its Gas TDSIC proceedings, Cause No. 17 44429 (Vectren South) and Cause No. 44430 (Vectren North). I have testified on behalf of Vectren South in its Electric TDSIC proceedings, Cause No. 44910. I also testified on 18 19 behalf of Vectren South in Cause No. 44909 and in support of its Clean Energy Cost Adjustment ("CECA") mechanism. I have also testified in numerous Gas Cost 20 21 Adjustment ("GCA"), Fuel Adjustment Clause ("FAC"), and other regulatory proceedings 22 on behalf of Vectren North and Vectren South.

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- 24 Q. What is the purpose of your testimony in this proceeding?
- 25 Α. The purpose of my testimony is to provide a brief description of Vectren South's 26 proposed solar project (the "Solar Project"), which qualifies as a "Clean Energy Project" under Ind. Code Ch. 8-1-8.8 ("the Statute"). I will explain the proposed ratemaking and 27 accounting treatment of the Solar Project within Vectren South's CECA, which the 28 Commission approved on August 16, 2017 in Cause No. 44909. I also will discuss how 29 30 Vectren South proposes calculating the Solar Project's revenue requirement, which is incorporated into the CECA, and how Vectren South proposes the Solar Project should 31 32 be depreciated.

- 1 Q. Are you sponsoring any attachments in this proceeding?
- 2 A. Yes. I am sponsoring the following exhibits in this proceeding:
- Petitioner's Exhibit No. 4, Attachment JCS-1 (Confidential): (Illustrative) CECA
 Total Annual Revenue Requirement, reflecting an illustrative filing cut-off date of
 September 30, 2020, and Rate Derivation, Schedules 1-12; and
 - Petitioner's Exhibit No. 4, Attachment JCS-2: CECA Tariff Sheet modifications.

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- 8 Q. Were these attachments prepared by you or under your supervision?
- 9 A. Yes, they were.

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12 II. PROPOSED SOLAR PROJECT

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- Q. Please briefly describe the Solar Project Vectren South has proposed in thisproceeding.
- 16 Α. As explained in more detail by Vectren South witness Wayne D. Games, Vectren South 17 is requesting Commission approval to construct a solar generating facility totaling 18 approximately 50 megawatts of alternating current ("MWac") within Vectren South's 19 service territory. The Solar Project is located on 300 acres of land in Spencer County, 20 Indiana. The Solar Project was initially initiated by Orion Renewable Energy Group LLC 21 ("Orion"). Vectren South ultimately determined Orion's development of the facility in its 22 service area presented a unique opportunity to add solar assets to the Company's 23 portfolio of generation assets and negotiated to acquire certain assets and associated 24 rights to complete the Solar Project. As further discussed by witness Games, Vectren 25 South engaged First Solar Electric, LLC ("First Solar") to be the Engineering, 26 Procurement and Construction contractor for the Solar Project.

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III. OVERVIEW OF PROPOSED RATEMAKING AND ACCOUNTING TREATMENT

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- Q. Please summarize Vectren South's specific ratemaking and accounting proposals and the statutory authority supporting these proposals.
- 33 A. The Statute provides for financial incentives including the timely recovery of costs and expenses incurred during the construction and operation of clean energy projects. Ind.

Code § 8-1-8.8-2(2) defines clean energy projects as those "to develop alternative energy sources, including renewable energy projects or coal gasification facilities." Ind. Code § 8-1-8.8-10(1) defines renewable energy resources as those listed in Ind. Code § 8-1-37-4(a)(1) through 4(a)(16) — specifically, 4(a)(2) "solar energy," and 4(a)(3) "photovoltaic cells and panels." In accordance with Ind. Code § 8-1-8.8-11 and utilizing the CECA mechanism approved in Cause No. 44909, Vectren South requests the Commission authorize the necessary accounting and ratemaking treatment to permit Vectren South to timely recover, through the CECA, the project costs it will incur during the construction and operation of qualifying projects, such as this Solar Project, through its rates.

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If the Commission approves this Solar Project, Vectren South will include these costs in its annual CECA filing once all of the Solar Project investments have been placed into service. These CECA rate updates will be filed as a subdocket of Cause No. 44909, the proceeding in which the CECA was originally approved. These subsequent CECA filings will allow Vectren South to recover costs incurred for the proposed project, including depreciation expense, PISCC, taxes, and O&M expenses.

Vectren South will depreciate all investments within the Solar Project over a period of 30 years. Carrying costs on the Solar Project investment will be calculated on an annual basis by applying Vectren South's pre-tax Weighted Average Cost of Capital ("WACC"), utilizing Vectren South's most recent cost of long-term debt and Commission approved cost of equity, to the capital investments for the Solar Project as each project is placed into electric plant in service. This calculation will be updated and included in each annual CECA filing in order to capture any changes in capital structure and the costs of debt and equity.

CECA revenue requirements will continue to be based on up to date cost and sales forecasts and will be allocated to Vectren South's retail rate schedules using the modified four coincident peak ("4CP") demand allocation percentages utilized in Vectren South's Reliability Cost and Revenue Adjustment ("RCRA"), and shown below in the table on page 11.

Approved CECA revenue requirements will be reconciled with actual recoveries in subsequent annual updates, in accordance with the Statute. Credits for the amortization of Investment Tax Credits ("ITCs") associated with the proposed project and proceeds from the sale of Renewable Energy Certificates ("RECs") generated by the Solar Project will be reflected as offsets to the CECA revenue requirement.

Prior to the initial CECA filing, depreciation expenses, PISCC, including both debt and equity, taxes, and O&M expenses associated with the Solar Project will be deferred into a regulatory asset until such time as the Solar Project investments, and the associated deferred balances, are included for recovery in the CECA.

Α.

Q. Is Vectren South requesting construction work in progress ("CWIP") ratemaking treatment for the proposed project in this proceeding?

Vectren South is not requesting CWIP ratemaking treatment through the proposed CECA. Vectren South will accrue an allowance for funds used during construction ("AFUDC") to reflect the cost of borrowed or invested funds, both debt and equity, used to finance the construction of the proposed project. In accordance with GAAP requirements, AFUDC amounts will be recorded and capitalized as part of the total cost of the Solar Project. Vectren South will continue to accrue AFUDC on the proposed project until such time as it is placed in service. Once the Solar Project is placed into service, AFUDC will cease and Vectren South will begin accruing PISCC deferrals, calculated at its WACC, until such time as the Solar Project investment expenditures are included for recovery in Vectren South's CECA.

Q. What types of costs will be included as utility plant upon which the Company will earn a return?

A. CECA will apply to the construction costs of the proposed project, including engineering and project management, permitting, contractor costs, site preparation, equipment and installation, and other costs approved by the Commission.

Q. What capitalized overheads will be included in the construction costs?

An allocation for general oversight, management and administrative costs will be included, consistent with Company policy. Costs associated with accounting, legal

services, human resource management, insurance and other similar costs are included as overhead costs that are allocated to construction projects. As described by witness Games, the Solar Project will be managed by First Solar with appropriate overheads directly charged to the project, which limits the amount of overhead expected on this Solar Project. The work papers in the CECA filing will segregate the applicable project costs included for recovery into categories of direct costs and indirect capital overheads.

Α.

Q. What AFUDC rate will be applied to project construction costs?

Vectren South will use the same AFUDC rate it uses for all other construction projects. This AFUDC rate is calculated each calendar month and represents the weighted cost of investor supplied capital adjusted to include short-term debt, as provided by Federal Energy Regulatory Commission ("FERC") accounting procedures. The periodic AFUDC rate is based on actual cost rates for long-term debt during a particular period and the actual cost rate of short-term debt for the same period. The cost rates for common equity are the cost of common equity determined in Vectren South's last electric base rate case, Cause No. 43839 (10.40%).

Q. Do Vectren South's AFUDC accrual procedures comply with the FERC USOA?

19 A. Yes.

IV. REVENUE REQUIREMENT

Α.

Q. Please generally explain how the CECA revenue requirement is calculated.

In each annual CECA update, Vectren South will calculate a revenue requirement on all approved investments placed in-service that includes the return on capital investment, incremental property tax, depreciation, and O&M expenses, as well as, recovery of the regulatory assets recorded through the deferral of O&M expense, the interim deferral of depreciation expense, and PISCC. An illustrative schedule demonstrating the components of the CECA revenue requirement is provided in Petitioner's Exhibit No. 4, Attachment JCS-1, Schedule 1. The total recoverable CECA revenue requirements will be allocated to Vectren South's retail rate schedules using the 4CP demand allocation percentages from Vectren South's last base rate case, Cause No. 43839, as modified in

Vectren South's most recent RCRA filing, as shown in the table below. Once the CECA revenue requirements have been allocated among the Rate Schedules, Vectren South will utilize the projected annualized sales volumes for its retail Rate Schedules to derive a CECA rate per kWh applicable to each Rate Schedule.

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Q. Please describe Schedule 1 (Revenue Requirement) of Attachment JCS-1.

This schedule illustrates the calculation of the proposed revenue requirement Vectren South will seek to recover in its periodic CECA updates. The revenue requirement calculation is divided on this schedule between the "Return on New Capital Investment", which calculates the pre-tax return on total net new investment (Lines 1 through 7), and the Incremental Expenses and Credits, which calculates the recoverable expenses, both projected and amortized from previously deferred balances (Lines 8 through 14), less the amortization of ITCs (Line 15) and any proceeds from the sale of RECs (Line 16).

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Q. Please describe Schedule 2 (New Capital Investment) of Attachment JCS-1.

A. This schedule supports the Gross New Capital Investment by project and the Accumulated Depreciation related to new capital investments for the Solar Project as of the filing date. These cumulative amounts will be reflected on Lines 1-3 of Attachment JCS-1, Schedule 1, and utilized in the return on new capital investment calculation. Vectren South will provide charge level detail to support these amounts within its workpaper schedules in subsequent CECA updates.

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Q. Please describe Schedule 3 (Post In-Service Carrying Costs (PISCC)) of Attachment JCS-1.

25 A. This schedule summarizes the calculation of the PISCC balance on investments placed 26 in service but not yet captured for recovery within the CECA. This schedule will be used 27 to support line 4 of Schedule 1, and the amount will be utilized in the return on new 28 capital investment calculation. In addition, this schedule will be used to determine the 29 recoverable amortization expense on the cumulative deferred PISCC balance, included 30 on line 12 of Schedule 1.

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32 Q. Please describe Schedule 4 (Pre-Tax Rate of Return/After-Tax PISCC).

33 A. Schedule 4 contains two pages. Page 1 of this schedule calculates the illustrative pre-

tax return used in the return on calculation on line 6 of Schedule 1. The pre-tax return is calculated by taking the WACC specific to the CECA revenue requirement and grossing up the equity component to capture recovery of state and federal taxes at current rates. The WACC shown in Schedule 4 is illustrative and will be adjusted in Vectren South's annual CECA filings to reflect the most current rates. Lines 6 through 12 of Schedule 4, Page 1 show the detailed calculation of the pre-tax equity rate.

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Page two of this schedule calculates the after-tax rate of return to be applied to PISCC deferrals, as shown on Schedule 3 of Attachment JCS-1.

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- 11 Q. Please describe Schedule 5 (Annualized Depreciation Expense on New Capital Investment) of Attachment JCS-1.
- A. This schedule supports the annualized depreciation expense utilized on line 8 of Attachment JCS-1, Schedule 1. This amount is calculated by multiplying the gross new capital investment balance as of the cut-off date from Attachment JCS-1, Schedule 2, by Vectren South's proposed depreciation rate for depreciable assets installed for the Solar Project.

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- Q. Please describe Schedule 6 (Amortization of Deferred Depreciation) of Attachment
 JCS-1.
- A. This schedule calculates the annualized level of deferred depreciation amortization expense included for recovery on line 11 of Schedule 1. It is calculated by multiplying the cumulative deferred depreciation balance as of the cut-off date by the annual depreciation rate being requested in this proceeding. As previously discussed, depreciation will be deferred on any project placed in service not yet included for recovery in the CECA.

- Q. Please describe Schedule 7 (Annualized incremental O&M and Amortization of deferred incremental O&M Expense) of Attachment JCS-1.
- 30 A. This schedule calculates the annualized level of O&M and amortization of deferred O&M expense, included for recovery in the CECA revenue requirement. Witness Games supports the estimated amount of O&M to include for recovery in rates. As discussed previously, the deferred O&M expense balance represents the cumulative expenses

incurred but not yet recovered in the CECA. The deferred balance, less amounts directly amortized for recovery in prior CECA updates, will be amortized and recovered over twelve (12) months. The annualized level of O&M represents the expected level of expense that will be built into the annual revenue requirement for the subsequent twelve (12) month period. This schedule supports lines 9 and 10 of the revenue requirement calculation on Attachment JCS-1, Schedule 1.

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- Q. Please describe Schedule 8 (Investment Tax Credit Calculation) of Attachment
 JCS-1.
- 10 A. This schedule provides the total amount of ITCs generated by project. In accordance 11 with federal tax normalization rules, ITCs must be deferred and amortized through 12 income tax expense over the life of the investment. This schedule supports line 15 of 13 Attachment JCS-1, Schedule 1.

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- 15 Q. Please describe Schedule 9 (Annualized Property Tax Expense) of Attachment JCS-1.
- 17 A. This schedule shows the calculation of the annualized level of property tax expense 18 associated with the Solar Project investments that will be included within the projected 19 revenue requirement calculation. This schedule supports line 13 of Attachment JCS-1, 20 Schedule 1.

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- 22 Q. Please describe Schedule 10 (NOI Adjustment for FAC Earnings Test) of Attachment JCS-1.
- A. Vectren South will adjust its statutory NOI earnings test by increasing the authorized NOI utilized in the test to reflect incremental earnings from approved CECA updates. This schedule calculates the after-tax return on investment that will be added to the authorized NOI by multiplying the net new capital investment from line 5 of Attachment JCS-1, Schedule 1 by the after-tax WACC on line 5 of Schedule 4, Page 1.

- 30 Q. Please describe Schedule 11 (Variance Calculation) of Attachment JCS-1.
- A. This schedule illustrates how future over- and under-recovery variances will be treated in each annual CECA update. Variances will be calculated by taking the difference between actual recoveries, exclusive of Indiana Utility Receipts Tax ("IURT"), and

approved recoveries from the prior CECA update. The variance is determined by month and by rate schedule, to ensure that customers are paying for only the costs allocated to and approved for recovery from that Rate Schedule.

Α.

Q. Please describe Schedule 12 (Rate Derivation) of Attachment JCS-1.

This schedule provides an example CECA rate derivation. CECA revenue requirements from Attachment JCS-1, Schedule 1 will be allocated to Vectren South's various retail Rate Schedules using the 4CP allocation percentages approved in Vectren South's most recent base rate case, modified to reflect the migration of a large customer to Vectren South's LP rate schedule, as described within the most recent periodic filing of Vectren South's RCRA rate adjustment mechanism, shown in the table below, and in Column A of this schedule.

	Cause No. 43839			Modified 4CP	
Rate Schedule	Demand (kW)	Original 4CP Allocation	Shift in Demand (kW)	Modified Demand (kW)	Modified 4CP Allocation
RS	464,042	40.4145%		464,042	43.1221%
В	1,406	0.1225%		1,406	0.1307%
SGS	19,622	1.7089%		19,622	1.8234%
DGS/MLA	300,282	26.1523%		300,282	27.9043%
OSS	23,196	2.0202%		23,196	2.1556%
LP/BAMP	218,745	19.0511%	39,190	257,935	23.9692%
HLF	120,912	10.5305%	(111,284)	9,628	0.8947%
	1,148,205	100.0000%	(72,094)	1,076,111	100.0000%

Prior period variances will be added to the incremental CECA revenue requirements (column C), and divided by an estimated level of annual sales (column E) for each rate schedule to derive a CECA rate for each Rate Schedule (column F). These rates will be grossed up for recovery of IURT (column G) to derive the final CECA rate for each rate schedule.

- Q. In Cause No. 44909, Vectren South received approval for the construction of three projects and the recovery of these project costs within the CECA. How will the proposed Solar Project be captured in the CECA schedules?
- A. In Cause No. 44909, Vectren South committed to a filing of the initial CECA rates and charges once the projects were completed and placed in-service. These projects have

not been completed yet, thus no CECA rates and charges are currently in place or pending approval by the Commission. Within the illustrative schedules presented in Cause No. 44909, Vectren South segregated the investments and associated costs by project, and will continue to maintain this segregation once the proposed Solar Project is approved for inclusion in the CECA. The illustrative schedules presented in this proceeding only capture the costs attributed to the proposed Solar Project.

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V. <u>TARIFF MODIFICATIONS</u>

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- 11 Q. Please describe <u>Petitioner's Exhibit No. 4</u>, Attachment JCS-2.
- A. Attachment JCS-2 is the modified CECA tariff sheet, Sheet No. 67, Appendix C, CECA.

 The CECA mechanism and the associated tariff sheet originally were approved in Cause

 No. 44909. The changes made to this tariff sheet are to update the allocation
 percentages to reflect those utilized in Vectren South's RCRA mechanism.

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VI. CONCLUSION

- 20 Q. Does this conclude your direct testimony?
- 21 A. Yes, at the present time.

VERIFICATION

I, J. Cas Swiz, Director of Rates and Regulatory Analysis for Vectren Utility Holdings, Inc., under the penalties of perjury, affirm that the answers in the foregoing Direct Testimony are true to the best of my knowledge, information and belief.

J. Cas Swiz

Director, Rates and Regulatory Analysis

The materials comprising Petitioner's Exhibit 4, Attachment JCS-1 contain confidential and proprietary information. A Motion for Protection relating to those materials was filed in this Cause on May 4, 2018.

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APPENDIX C CLEAN ENERGY COST ADJUSTMENT

<u>APPLICABILITY</u>

The Clean Energy Cost Adjustment (CECA) shall be applicable to all Rate Schedules as reflected in the CECA Rates section below.

DESCRIPTION

The CECA shall recover Clean Energy Investments, as approved by the Commission, as follows:

(1) Company's costs and expenses incurred during the construction and operation of clean energy projects pursuant to Ind. Code Ch. 8-1-8.8.

The CECA shall be calculated annually for each Rate Schedule as follows:

$$CECA = \frac{[(RR + V)x \ Rate \ Schedule \ Allocation \ Percentage]}{Rate \ Schedule \ Sales \ Quantities}$$

Where:

RR is the Revenue Requirement on eligible Clean Energy Investments as follows:

- (a) The Annualized Return on the Net Plant Balance of eligible Clean Energy Investments, inclusive of deferred Post In-Service Carrying Costs (PISCC); plus
- (b) Incremental Depreciation Expense on in-service qualified CECA Investments; plus
- (c) Incremental Operation & Maintenance expenses associated with Clean Energy Investments; plus
- (d) Amortization of Deferred Operation & Maintenance expenses associated with Clean Energy Investments; plus
- (e) Amortization of Deferred Depreciation Expense on in-service qualified CECA Investments; plus
- (f) Amortization of Deferred PISCC on qualified CECA Investments: plus
- (g) Associated Taxes including Property Taxes; less
- (h) Investment Tax Credit (ITC) Amortization Credits; less
- (i) Proceeds from the sale of Renewable Energy Credits associated with qualified Clean Energy Investments.

 $\underline{\mathbf{V}}$ is the variance from the applicable prior period reconciliation, with any differences being reflected as a charge or credit in a subsequent CECA.

Rate Schedule Allocation Percentage is the proportion of the CECA applicable to each Rate Schedule. The percentage for each Rate Schedule is shown in the CECA Rates section below.

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APPENDIX C CLEAN ENERGY COST ADJUSTMENT

(Continued)

Rate Schedule Quantities are the estimated billing determinant quantities for each Rate Schedule for the projection period.

The calculated CECA rates shall be further modified to include the impact of the Indiana Utility Receipts Tax and other similar revenue-based tax charges.

CECA RATES

Modified 4CP Allocation <u>Percentage</u>	Charge Adjusted	CECA Rate (\$ per KWh)
43.1221%	Energy	\$0.xxxxx
0.1307%	Energy	\$0.xxxxxx
1.8234%	Energy	\$0.xxxxxx
27.9043%	Energy	\$0.xxxxxx
2.1556%	Energy	\$0.xxxxxx
23.9692%	Energy	\$0.xxxxxx
0.8947%	Energy	\$0.xxxxxx
	Allocation Percentage 43.1221% 0.1307% 1.8234% 27.9043% 2.1556% 23.9692%	Allocation Percentage Charge Adjusted 43.1221% Energy 0.1307% Energy 1.8234% Energy 27.9043% Energy 2.1556% Energy 23.9692% Energy

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APPENDIX C CLEAN ENERGY COST ADJUSTMENT

APPLICABILITY

The Clean Energy Cost Adjustment (CECA) shall be applicable to all Rate Schedules as reflected in the CECA Rates section below.

DESCRIPTION

The CECA shall recover Clean Energy Investments, as approved by the Commission, as follows:

(1) Company's costs and expenses incurred during the construction and operation of clean energy projects pursuant to Ind. Code Ch. 8-1-8.8.

The CECA shall be calculated annually for each Rate Schedule as follows:

$$CECA = \frac{[(RR+V)x \ Rate \ Schedule \ Allocation \ Percentage]}{Rate \ Schedule \ Sales \ Quantities}$$

Where:

RR is the Revenue Requirement on eligible Clean Energy Investments as follows:

- (a) The Annualized Return on the Net Plant Balance of eligible Clean Energy Investments, inclusive of deferred Post In-Service Carrying Costs (PISCC); plus
- (b) Incremental Depreciation Expense on in-service qualified CECA Investments; plus
- (c) Incremental Operation & Maintenance expenses associated with Clean Energy Investments; plus
- (d) Amortization of Deferred Operation & Maintenance expenses associated with Clean Energy Investments; plus
- (e) Amortization of Deferred Depreciation Expense on in-service qualified CECA Investments; plus
- (f) Amortization of Deferred PISCC on qualified CECA Investments; plus
- (g) Associated Taxes including Property Taxes; less
- (h) Investment Tax Credit (ITC) Amortization Credits; less
- (i) Proceeds from the sale of Renewable Energy Credits associated with qualified Clean Energy Investments.

 $\underline{\underline{V}}$ is the variance from the applicable prior period reconciliation, with any differences being reflected as a charge or credit in a subsequent CECA.

Rate Schedule Allocation Percentage is the proportion of the CECA applicable to each Rate Schedule. The percentage for each Rate Schedule is shown in the CECA Rates section below.

Effective:

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APPENDIX C CLEAN ENERGY COST ADJUSTMENT

(Continued)

Rate Schedule Quantities are the estimated billing determinant quantities for each Rate Schedule for the projection period.

The calculated CECA rates shall be further modified to include the impact of the Indiana Utility Receipts Tax and other similar revenue-based tax charges.

CECA RATES

	Rate <u>Schedule</u>	Modified 4CP Allocation <u>Percentage</u>	Charge Adjusted	CECA Rate (\$ per KWh)	
	RS	4 3 <u>,1221</u> %	Energy	\$0.xxxxxx	Deleted: 0
	В	0. <u>1307</u> %	Energy	\$0.xxxxx	Deleted: 4145
ľ	SGS	1 <u>,8234</u> %	Energy	\$0.xxxxxx	Deleted: 1225
	DGS/MLA	2 <u>7,9043</u> %	Energy	\$0.xxxxxx	Deleted: 7089
	oss	2 <u>,1556</u> %	Energy	\$0.xxxxxx	Deleted: 6
	LP/BAMP	2 3,9692%	Energy	\$0.xxxxx	Deleted: 1523
İ	HLF	0.8947%	Energy	\$0.xxxxx	Deleted: 0202
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Effective: