REVISED DIRECT TESTIMONY OF ROGER A. FLICK, II
RATES & REGULATORY STRATEGY MANAGER
DUKE ENERGY BUSINESS SERVICES LLC
ON BEHALF OF DUKE ENERGY INDIANA, INC.
BEFORE THE INDIANA UTILITY REGULATORY COMMISSION

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Roger Flick, and my business address is 1000 East Main Street, Plainfield, Indiana.

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

A. I am employed by Duke Energy Business Services LLC, the service company affiliate of Duke Energy Indiana, Inc. ("Duke Energy Indiana," "Petitioner," or "Company") as a Rates & Regulatory Strategy Manager.

Q. PLEASE DESCRIBE YOUR DUTIES AS A RATES & REGULATORY STRATEGY MANAGER.

A. My job duties span a spectrum of activities. At the highest level, I provide technical regulatory, financial, accounting, analytic and strategic support to Duke Energy stakeholders. I am often engaged in matters that require technical pricing and/or tariff administrative support. My work is principally focused on Duke Energy Indiana, but I do participate in work that extends into other Duke Energy jurisdictions.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. I began my career with the Company in 2000 as an Analyst in the Rates Department. I continued working in the Rates Department in positions of increasing responsibility until

2014 when I moved to Pricing, Load Analytics, and Regulatory Solutions in the Customer Solutions and Strategies group. I hold Bachelor of Science degrees in Finance and Legal Studies from Indiana University's Kelley School of Business and a Masters of Business Administration degree from Indiana State University's Scott College of Business. Prior to working for the Company, I was employed by National City Bank, which was subsequently acquired by PNC Bank, as a Commercial Credit Analyst.

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

A. The purpose of my testimony in this proceeding is to discuss and explain: (1) proposed changes to the Company's retail electric tariff; (2) proposed changes in nonrecurring rates and charges and their effect on forecasted revenue, including supporting the resulting *pro forma* adjustment; and (3) "Other Revenue" analysis used in the determination of present revenue.

II. RETAIL ELECTRIC TARIFF

Q. PLEASE DESCRIBE THE RETAIL ELECTRIC TARIFF BEING SUBMITTED WITH YOUR TESTIMONY ON THE COMPANY'S BEHALF.

A. Duke Energy Indiana's Retail Electric Tariff is meant to document and inform stakeholders of programs and services, and general terms and conditions of service, the Company offers and related details. I am submitting both clean and red-line versions of the tariff. The red-line version is intended to highlight changes the Company is proposing to the currently approved tariff. The clean version of the tariff has been attached to my testimony as Petitioner's Exhibit 9-A (RAF). The red-line version is being attached as Petitioner's Exhibit 9-B (RAF). Please note that substantive changes

are redlined using computer redlining tools and in some cases due to formatting issues, the headers and footers are not fully redlined.

Q. HAVE YOU INCLUDED REVISED TARIFF SHEETS FOR RATE SCHEDULES SINCE THE INITIAL FILING?

A. Yes, I have. The Revised Direct Testimony of Mr. Bailey supports changes to the following tariff sheets:

1) Sheet No. 10, Rate LLF

2) Sheet No. 10.1, Rate LLF – Optional High Efficiency Total Electric Commercial Service

3) Sheet No. 10.2, Rate LLF – Optional Time-of-Use Service

4) Sheet No. 12, Rate HLF

5) Sheet No. 12.2, Rate HLF – Optional Time-of-Use Service

6) Sheet No. 97 - Experimental Demand Management, and Stability Program

7) Sheet No. 98 – Experimental Market Pricing Program

For ease of review and filing, I have provided the clean version only of these revised tariff sheets in Revised Petitioner's Exhibit 9-A (RAF).

Q. PLEASE EXPLAIN HOW THE COMPANY'S RETAIL ELECTRIC TARIFF IS ORGANIZED.

A. The tariff is first divided into two (2) sections. Section I contains all elements of the tariff except for the affiliate guidelines. Section I is further subdivided into sheets which extend from 1 to 99. Those sheets are grouped by either purpose or type of service or rider (*e.g,*. reference or single-phase). A list of sheet groupings follows.

1) Reference

2) General Terms and Conditions for Electric Service

3) Single-Phase

4) Three-Phase

5) Lighting Service

6) Miscellaneous

7) Rate Adjustment Riders

8) Pilots and Experimental Rates

9) Rate Decoupling Mechanism

Section II

1) Affiliate Guidelines

My testimony below is organized in a manner that reflects the tariff sheet groupings above.

1. REFERENCE

Q. IS THE COMPANY PROPOSING ANY SUBSTANTIVE ADJUSTMENTS TO THE GROUP OF TARIFF SHEETS YOU REFER TO AS REFERENCE?

A. This group is composed of sheet numbers 1 – 4. All proposed adjustments to sheets 1, 2 and 4 were of a clerical nature. Sheet No. 3, Index of Cities, Towns and Unincorporated Communities Served by Company reflects substantive adjustment. The Company's geographic information system enabled more comprehensive reporting of areas within the State it provides service. I would also point out that Sheet No. 2 contains a roadmap of the Company's tariff in the form of a table of contents.

2. GENERAL TERMS AND CONDITIONS

Q. WHERE CAN THE COMPANY'S GENERAL TERMS AND CONDITIONS FOR ELECTRIC SERVICE BE ACCESSED?

A. The Company offers this information along with its entire Retail Electric Tariff to its customers and the general public on its webpage at the following universal resource locator (URL):

https://www.duke-energy.com or https://www.duke-energy.com/home/billing/rates

Q. IS THE COMPANY PROPOSING ANY CHANGES TO THE TARIFF'S GENERAL TERMS AND CONDITIONS?

A. Yes, a number of adjustments were made and are visible within Petitioner's Exhibit 9-B (RAF). Many of the changes are of a clerical nature, but a number were substantive.

Q. PLEASE IDENTIFY AND DISCUSS THE SUBSTANTIVE CHANGES THE COMPANY IS PROPOSING.

A. A number of definitions were either added or amended within the document. First, the term "Cost of underground service extension" was added. This was added to clearly differentiate the Company's general standard for service extension (overhead) from the generally more costly underground extension. The term, "Cost of modifications to service extensions" was also added. This addition was meant to underscore cost responsibility for customers requesting physical modification of their existing electric service. The word customer was redefined in a more specific manner by adding terms like municipalities and governmental agencies as potential customer entities. The illustrative example of the computation of kilowatt hours was modernized with light bulb consumption amounts more in line with LED technology. The term "Power Factor" was

redefined in a manner believed to be more instructive. The word "contiguous" was added to the definition of premises in an attempt to further refine that definition. Primary Direct Service was also added to the Company's definitions to help clarify requirements. A more descriptive explanation of Reactive Volt-Amperes was also added.

Q. ARE THERE OTHER NOTABLE PROPOSED ADJUSTMENTS?

A. Yes. Section 3.7 was updated to reflect a more modern explanation of what constitutes an application for service and potential corresponding deposit requirements. Section 4.1 was amended to add irrevocable letters of credit and surety bonds as viable forms of posting service deposits. Section 4.2, 4.4 and 12.2 were enhanced or added based on recommendations from our Customer Services department. I would refer further discussion regarding those adjustments to Duke Energy Indiana Company witness Ms. Lesley G. Quick. Section 5.5 was added to address the Company's intent to continue offering the Energy Profiler Online ("EPO") program, but with more streamlined pricing. The program existed in its prior form with a number of pricing options which through discussions with program managers were determined to be unnecessary. Going forward the Company intends to offer this purely elective service at a single price of $15 a month. Section 6.1 was updated to reflect an increased transformer size limit under our general standards for three phase-service.

Q. THE COMPANY IS IN THE PROCESS OF DEPLOYING SMART METERING TECHNOLOGY THROUGHOUT ITS SERVICE TERRITORY. COULD YOU PLEASE EXPLAIN WHAT IMPACT THAT HAS HAD ON PROPOSED NON-PAYMENT RECONNECTION CHARGES AND THE PURPOSE OF THOSE CHARGES?

A. Yes. Non-payment reconnection charges serve a valuable purpose. They deter non-payment disconnection and act to insulate other paying customers from the cost incurred to reconnect non-paying customers' service. Smart metering technology has acted to significantly reduce the cost for remotely reconnecting service, but a charge is still warranted for the aforementioned reasons. In this proceeding the Company is proposing a $6 remote reconnection rate, which is down considerably, from the existing reconnection charge of $25. Manual reconnection is anticipated to still be necessary even after smart metering technology has been fully deployed in some instances. For example, if a customer has opted-out of smart metering technology deployment, a manual reconnection would be necessary. Therefore, an updated manual non-payment reconnection charge of $37 per occurrence is also being proposed. Both charges are based on the updated cost of service, and details can be found in the Minimum Standard Filing Requirements ("MSFR") for non-recurring rates and charges.

Q. IS THE COMPANY ALSO REQUESTING AN UPDATE TO ITS AFTER HOURS SERVICE RATE OR OTHER TERMS OF EXISTING STANDARD CONTRACT RIDER 55?

A. Yes. The Company wants to transition its current Standard Contract Rider 55 – After Hours Service Rate to the General Terms and Conditions for Electric Service under Section 12.9 and amend the period of time the charge applies. Moving the terms of service to the General Terms and Conditions for Electric Service is believed to be more administratively efficient. Adjusting the hours of applicability from 8:00 AM to 5:00 PM to 7:30 AM to 3:30 PM better aligns with operational activities and the Company's cost incurrence for offering after hours service. For example, requests for service taken after

3:30 PM generally cannot be resolved before a typical service representative ends his shift creating more cost to perform the job. The new charge, based on updated cost for the service, is $250 per trip compared to the existing rate of $125. Cost details can be found in the MSFR for non-recurring rates and charges.

Q. DO THE PROPOSED GENERAL TERMS AND CONDITIONS FOR ELECTRIC SERVICE REFLECT A PROPOSAL TO CHARGE ADDITIONAL AMOUNTS TO DETER THEFT AND TAMPERING WITH ELECTRIC SERVICE?

A. Witness Ms. Quick addresses this matter in her testimony and explains this is an additional tool the Company hopes to use to further dissuade the dangerous practice of tampering with electric service.

Q. ARE THERE OTHER ADJUSTMENTS YOU WOULD LIKE TO ADDRESS?

A. Just two (2) more items. Section 16.1 had the word terrorism added to it and Section 21 contains adjusted language which is believed to be more concise and instructive regarding the taxes that are included in our rates and charges.

3. SINGLE-PHASE SERVICE

Q. WOULD YOU PLEASE ADDRESS ANY NOTABLE PROPOSED ADJUSTMENTS TO THE COMPANY'S SINGLE-PHASE TARIFFS?

A. Certainly. Sheet No. 6, Rate RS – Schedule for Residential Electric Service was updated to reflect availability of the *YourFixed Bill* as a pricing option. Although no change in current practice is being proposed, a term was added to the Special Terms and Conditions section for informational purposes to distinguish residential and allowable nonresidential service under Rate RS. Sheet No. 6.3, Rate RS – Optional High Efficiency Service has been closed to new customers since 2007. The Company intends to continue offering this

rider to existing participants only and updated its language to better align with the standard residential rate. Sheet No. 7.1, Rate CS – Optional High Efficiency Total Electric Commercial Service is open to new customers and reflects new efficiency standards for qualifying equipment. Sheet No. 20 – *Your FixedBill* reflects clarification within its formula that projected energy values are used in its pricing. Several sentences were struck from Standard Contract Rider No. 59, Advanced Meter Opt-Out, because they apply only during the smart meter roll-out, which is planned to be completed in 2019 prior to the expected date of the order in this proceeding approving the riders.

Q. ARE THERE ANY OTHER SINGLE-PHASE TARIFF MATTERS YOU WOULD LIKE TO ADDRESS?

A. Yes. The Company is proposing a new tariff, Sheet No. 27, RATE USFL – Unmetered Small Fixed Load Service. The tariff is necessary to specifically address increased demand for small wattage attachments (*e.g.,* video cameras and wireless technology) to the Company's distribution system. These types of loads are generally predictable and small. In fact, the tariff requires loads to be less than or equal to 100 Watts. Energy consumption can be reasonably determined without the added cost metering would require.

4. THREE-PHASE SERVICE

Q. PLEASE ADDRESS ANY NOTABLE PROPOSED ADJUSTMENTS TO THE COMPANY'S THREE-PHASE TARIFFS.

A. Sheet No. 10, Rate LLF, reflects an additional term intended to provide for the Fast Charging Fee of the Direct Current Fast Charging program that the Direct Testimony of Duke Energy Indiana witness Mr. Lang W. Reynolds addresses in more detail. Sheet No.

10.1, Rate LLF – Optional High Efficiency Total Electric Commercial Service, reflects updated equipment requirements. Sheet No. 10.2, Rate LLF – Optional Time-of-Use Service and Sheet No. 12.2, Rate HLF – Optional Time-of-Use Service, propose adjusted periods of applicability with summer peak hours of 11:01 AM – 6:00 PM, Monday through Friday from 12:01 PM through 8:00 PM, Monday through Friday. Winter peak hours from 6:01 AM through 2:00 PM from 7:01 AM through 1 PM with the evening peak staying the same as before at 6:01 PM though 9:00 PM. All Spring and Fall hours are proposed to remain off-peak. The testimony of Duke Energy Indiana witness Mr. Jeffrey B. Bailey also addresses this change and others related to our new dynamic pricing and time-of-use rates in more detail. Both tariffs 10.2 and 12.2 also had language pertaining to the rate equalization adjustment struck in order to make the tariffs more attractive to the Company's customers. The Connection Fee on Sheet No. 21, Rate BDP – Backup Delivery Service was changed to reflect that pricing is dependent upon on a customer's standard service rate.

Q. HAVE THERE BEEN ANY SUBSTANTIVE CHANGES TO SHEET NO. 23, PEAK LOAD MANAGEMENT?

A. Yes. The Company proposes to expand the period of general summer applicability to May and October. Summer hours generally extend from 11:00 AM to 8 PM, but are not intended to preclude agreements for other hours. The non-summer period is proposed to include November through April and the hours of 6 AM to 10 PM. The Company also wants to extend participation to customers on either Sheet Nos. 7 or 7.1, Commercial Service.

5. LIGHTING

Q. WOULD YOU NEXT ADDRESS THE SET OF TARIFFS YOU IDENTIFIED ABOVE AS LIGHTING?

A. Yes. For informational purposes, please note that this set of tariffs is composed of both metered and unmetered lighting rates. Our metered lighting rates ("MS", "MHLS", "MOLS") are for unpredictable loads or unique groups of customers who desire metered service. Our unmetered lighting rates ("SL", "UOLS", "LED") are for lighting customers with predictable loads who do not desire metering or the cost that accompanies it. The six (6) rates hereafter are referred to as the lighting rates. Lighting system ownership and attendant maintenance responsibilities stretch a spectrum from customers that own and maintain their lighting systems to customers that receive lighting service from the Company from Company-owned and maintained lights. The matter of lighting system ownership, and tariff applicability, is generally addressed in the body of our Lighting tariffs.

Q. WHAT APPROACH DID THE COMPANY TAKE IN DESIGNING ITS LIGHTING RATES?

A. The Lighting rates were designed in much the same manner explained in Duke Energy Indiana Witness Direct Testimony of Mr. Jeffrey R. Bailey. Billing records for the period of July 2017 through June 2018 were accumulated to create a frequency distribution. I then reconciled kilowatt-hours ("kWh") sold and revenues to the Company's books and records to ensure accuracy. The distribution of sales was then used to apportion the forecast data (calendar year 2020) into necessary amounts. The rate

was then designed to reflect revenue levels after subsidy and excess revenue reductions for the Lighting rates.

Q. WOULD YOU PLEASE BEGIN BY EXPLAINING PROPOSED CHANGES TO THE COMPANY'S METERED LIGHTING TARIFFS?

A. Yes. The Company requests authority to terminate Sheet No. 35, Rate TS – Schedule for Traffic Signal Service and Sheet No. 36, Rate FS – Schedule for Flasher Signal Service and to transition remaining customers to Sheet No. 46, Rate MS – Metered Signal Service. The Company requested, and received approval, to close Rates TS and FS to new participation and signaled its intentions to transition those customers to Rate MS in the last general rate case. In this case the Company is simply requesting authority to complete the transition process. It is my understanding the Company initiated the process of transition to MS from the unmetered rates TS and FS because the Company was regularly encountering situations where it was unaware of changes being made to customer-owned lighting systems that affected electricity consumption. The Company intends to proactively work with impacted customers to manage impacts of the transition.

Q. IS THE COMPANY PROPOSING OTHER ADJUSTMENTS TO ITS METERED LIGHTING TARIFFS?

A. Yes. Sheet No. 38, Rate MHLS – Schedule for Metered Highway Lighting Service and Sheet No. 41, Rate MOLS – Schedule for Metered Outdoor Lighting Electric Service were adjusted to include language clarifying that the Company does not perform vegetation trimming for illumination obstruction.

Q. WOULD YOU PLEASE CONTINUE BY ADDRESSING ADJUSTMENTS TO THE UNMETERED LIGHTING TARIFFS?

A. Certainly. Sheet No. 33, Rate SL - Street Lighting Service has new proposed equipment and energy rates. The Company also clarified that as a matter of policy it does not trim vegetation due to illumination obstruction. SL is to remain closed and subject to transition to another then-active lighting rate, as of May 1, 2024. Sheet No. 42, Rate LED – Unmetered Outdoor Lighting Service and Sheet No. 40, Rate UOLS Unmetered Outdoor Lighting Service had energy rates updated and language added proposing that electronic signatures could be used to execute lighting contracts. Rate UOLS also had language added indicating the Company will not trim vegetation for illumination obstruction. Rates UOLS and LED also had their corresponding contracts refreshed and are being submitted for Commission review.

Q. HOW IS THE COMPANY PROPOSING TO ADMINISTER ITS LED PROGRAM IN THE FUTURE?

A. Given technology continues to advance and customer preferences and the Company's product line continue to evolve, the Company intends to submit filings with the Commission, no more frequently than annually, requesting authority to make necessary updates and changes to the program. These annual filings will not include adjustments in the program's energy charges which are being submitted for Commission consideration in this proceeding.

Q. DOES THE COMPANY INTEND TO RETAIN BOTH RATE UOLS AND RATE LED IN THE FUTURE?

A. Yes. Rate UOLS serves as a valuable complement to Rate LED. The Company intends for Rate LED to be its primary lighting tariff for unmetered service in the future, but has found a significant number of customers still require an unbundled pricing option.

Q. ARE THERE ANY OTHER LIGHTING TARIFF MATTERS YOU WOULD LIKE TO ADDRESS?

A. Yes. The Company's Lighting Department provided me with updated monthly energy consumption information by type of equipment. This is the basis for determining the amount of energy that an unmetered lighting customer consumes and is billed for monthly. This information is being submitted for consideration as Sheet No. 39 – Estimated kWh Consumption for Unmetered Lights by Month.

6. MISCELLANEOUS

Q. HAVE THERE BEEN ANY NOTABLE CHANGES TO THE GROUP OF TARIFFS YOU REFER TO AS MISCELLANEOUS ABOVE?

A. Yes. Sheet No. 26, Solar Services, reflects tariff references that better align with tariff naming proposed in this proceeding. A term was also added excluding customers on the Solar Services Rider from also participating in the Company's newly proposed dynamic pricing options for commercial service customers. This is necessary to keep the pilot program's data as consistent and reliable as possible. Sheet No. 53, Excess Facilities reflects a proposed monthly excess facilities charge of 1.37% and a one-time payment of 1.25 times the estimated cost of installing excess facilities.

Q. WOULD YOU ADDRESS ANY CHANGES YOU ARE PROPOSING TO THE *GOGREEN* PROGRAM?

A. Yes. Sheet No. 56 documents terms and conditions of the *GoGreen* program. The Commission issued an order in Cause No. 44933 on October 25, 2017 that, among other things, extended the Company's authority to offer the program through calendar year 2022 at which time, barring an extension or rate case proceeding, the program would

terminate. The Company is requesting the authority to offer this program on a permanent basis. The program is valued by our customers as evidenced by increased participation shown in our most recent informational filing below.

Table 1:

2018	Total Customers
January	1,359
February	1,357
March	1,354
April	1,356
May	1,406
June	1,406
July	1,679
August	1,683
September	1,693
October	1,688
November	1,686
December	1,688

The program has a long history which stretches back almost two decades to 2001. Its long history and proven customer demand suggest permanent status is appropriate.

Q. WOULD YOU PLEASE ADDRESS ANY TARIFFS WITHIN THE MISCELLANEOUS GROUP YOU ARE PROPOSING TO TERMINATE?

A. Yes. The Company is proposing to terminate Sheet No. 19, Non-Firm Service. This tariff is not part of the Company's future vision. Programs like those offered under Sheet No. 23, Peak Load Management and proposed under Sheet No. 97 - Experimental Demand Management, and Stability Program and Sheet No. 98 – Experimental Market Pricing Program, have supplanted the need for Sheet 19.

Q. HOW IS THE COMPANY PROPOSING TO ADMINISTER ITS QUALIFYING FACILITIES ("QF") PROGRAM IN THE FUTURE?

A. The Company intends to continue to make annual filings with the Commission to adjust the capacity and energy rates reflected on Sheet No. 50, RATE QF, Parallel Operation For Qualifying Facility. In this filing the Company is also announcing its intention to adjust the periods of capacity payment eligibility to better align with the On-Peak periods proposed for its LLF and HLF time-of-use tariffs. The Company will formally request authority to make that change in its next QF filing in 2020.

Q. WITH THOSE PROGRAM MATTERS ADDRESSED, ARE THERE OTHER CHANGES OF NOTE IN THIS SERIES OF TARIFFS?

A. No.

7. RATE ADJUSTMENT RIDERS

Q. REGARDING THE SET OF TARIFFS YOU REFER TO ABOVE AS RATE ADJUSTMENT RIDERS, ARE YOU ADDRESSING PROPOSED CHANGES TO THESE TARIFFS?

A. I have submitted the adjusted rate adjustment tariffs with my testimony to provide a single location interested stakeholders can access our comprehensive tariff. Any substantive adjustments to these tariffs will be addressed by the Company witnesses Ms. Christa L. Graft, Ms. Diana L. Douglas and Ms. Suzanne E. Sieferman.

8. PILOTS AND EXPERIMENTAL RATES

Q. REGARDING THE SET OF TARIFFS YOU REFER TO ABOVE AS PILOTS AND EXPERIMENTAL RATES, ARE YOU ADDRESSING THOSE PROPOSALS?

A. No. Duke Energy Indiana witness Mr. Bailey addresses those matters in his testimony. Similar to the situation with Rate Adjustment Riders, I submitted eight (8) tariffs to provide a single location interested stakeholders can access our comprehensive tariff.

9. DECOUPLING MECHANISM

Q. REGARDING THE TARIFF YOU REFER TO ABOVE AS THE DECOUPLING MECHANISM, ARE YOU ADDRESSING THAT PROPOSAL?

A. No. Witnesses Dr. Daniel G. Hansen, Ms. Maria T. Diaz and Mr. Bailey address that matter in their testimonies. For the same reasons mentioned above, I submitted that tariff with my testimony.

10. SECTION TWO AFFILIATE STANDARDS

Q. IS THE COMPANY PROPOSING AMENDMENTS TO THE AFFILIATE STANDARDS?

A. No.

III. NON-RECURRING RATES AND CHARGES

Q. PLEASE ADDRESS THE COMPANY'S PROPOSAL TO CHANGE THE ITEMS YOU REFERRED TO AS NON-RECURRING RATES AND CHARGES AND ANY RELATED IMPLICATIONS.

A. There were a number of non-recurring charge amounts that needed updating that had not been identified when the revenue forecast was created. This caused a subsequent need to adjust forecasted revenues lower to ensure synchronization with the proposed charges. More specifically, there are seven (7) charges or rates the Company is seeking to adjust, and they net to a $662,000 reduction in revenue. Petitioner's Exhibit 9-C (RAF) Schedule REV 7 shows the *pro forma* adjustment to revenue for the change in amount for

these charges. I provided witnesses Mr. Bailey and Ms. Douglas with the results of my work and this exhibit. I discuss each of the seven (7) items below.

1) The Company is proposing to lower its current non-payment reconnection charge from $25 to $6 for automated reconnections. This is expected to reduce revenues by $1,207,000 from what was in the revenue forecast.

2) The Company is proposing to increase its after-hours service call charge to $250 per trip from $125 per trip. This is expected to increase revenues by $272,000.

3) The revenue forecast did not include a full year's amount of AMI Opt-out revenue. Annualizing these charges results in additional revenue of $13,000.

4) The Company is proposing the monthly Excess Facilities rate be reduced from 1.43% to 1.37% causing revenues to be reduced by $6,000.

5) Provisions within the Company's HLF tariff permit customers to declare maintenance outages and have their demand charges prorated subject to the terms of that rate. Each maintenance outage triggers a $500 charge. This charge resulted in a cumulative amount of $31,000 that needs to be added to forecasted revenues.

6) The Company is proposing to assess a Theft/Tampering Deterrence Charge. Doing so is expected to generate $194,000 that needs added to forecasted revenue.

7) The Company is also proposing to increase the elective Energy Profiler Online program's charge to $15 generating an incremental $41,000 that also needs added to forecasted revenues.

IV. OTHER REVENUE

Q. WOULD YOU PLEASE ADDRESS THE "OTHER REVENUE" MATTER YOU REFERENCED ABOVE?

A. Yes. I worked collaboratively with witnesses Mr. Bailey and Ms. Douglas to determine the Company's present revenue by rate class. Mr. Bailey calculated present base revenue while witness Douglas determined present tracker revenue. I calculated the net amount of "Other Revenue" which is composed of several unique items that, if omitted, would overstate present revenue. I calculated a net amount of ($13,297,000) of Other Revenue. This amount is primarily composed of demand side management credits the Company provides to participants of the PowerShare® program ($10.1M). The balance of Other Revenue is owed to an assortment of less consequential items that include: Economic Development credits, Maintenance Period revenue reductions for prorated demand charges and revenue generated from customers who have bulked meters.

V. CONCLUSION

Q. WERE PETITIONER'S EXHIBITS 9-A (RAF) AND 9-B (RAF) AND 9-C (RAF) PREPARED BY YOU OR UNDER YOUR DIRECTION?

A. Yes, they were.

Q. DOES THIS CONCLUDE YOUR PREPARED TESTIMONY?

A. Yes, it does.

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

RATE LLF - LOW LOAD FACTOR SERVICE

Availability

Available to any customer contracting for light and/or power purposes, provided, however, that all electric service at one location on customer's premises is supplied hereunder.

Character of Service

Electric energy supplied hereunder shall be alternating current, sixty Hertz, at any standard single phase and/or polyphase voltage supplied by Company in the locality for which the service is requested.

Connection Charges Per Month:

Secondary	$ 22.83
Primary and Primary Direct	$ 109.43
Transmission	$ 360.20

Rate For Primary and Transmission Service*

Maximum Load Charge *(Monthly)*

Primary Service at Nominal Voltage of 2,400 to 34,500 Volts

Each kW of Billing Maximum Load	$4.38 per kW
Energy Charge *(In Addition to the Maximum Load Charge)*	$0.083507 per kWh

Primary Direct Service at Nominal Voltage of 2,400 to 34,500 Volts

Each kW of Billing Maximum Load .	$4.46 per kW
Energy Charge *(In Addition to the Maximum Load Charge)* ……	$0.077944 per kWh

Transmission Line Service at Nominal Voltage of 69,000, 138,000, 230,000 or 345,000 Volts

Each kW of Billing Maximum Load	$4.01 per kW
Energy Charge *(In Addition to the Maximum Load Charge)*	$0.076602 per kWh

kVAr Charge

For Each kVAr of the Monthly Billed kVAr Demand	$0.28 per kVAr*

Rate For Secondary Service*

First 300 kWh	$0.205062 per kWh
Next 700 kWh	$0.164888 per kWh
Next 1500 kWh	$0.148590 per kWh
Over 2500 kWh	$0.110505 per kWh

*Subject to the riders listed on Appendix A – List of Applicable Rate Adjustment Riders.

Issued: **Effective:**

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

RATE LLF - LOW LOAD FACTOR SERVICE

Load Factor Provision

That portion of monthly use which is in excess of 190 hours use of the Billing Maximum Load will be billed at the following rate:

Next 110 hours use of Billing Maximum Load ..... $0.098098 per kWh
Over 300 hours use of Billing Maximum Load ..... $0.088988 per kWh

kVAr Charge*

For Each kVAr of the Monthly Billed kVAr Demand..... $0.28 per kVAr

*Until such time as Company has installed the appropriate metering and billing facilities to bill Secondary customers for kVAr usage, the kVAr charge will not apply to Secondary customers.

Billing Maximum Load

Shall be the maximum average number of kilowatts in the thirty-minute interval which the energy metered is greater than in any other thirty-minute interval in such month. When energy is metered through more than one meter the maximum loads, separately determined for each meter, shall be added together for determining the maximum load for the month.

Billing of kVAr

For customers who have pulse metering, the billed kVAr demand will be determined by trigonometric calculation using the customer's peak 30-minute kW demand for the month and the power factor coincident with the peak 30-minute kW demand for the month. For customers who do not have pulse metering, the billed kVAr demand will be determined by trigonometric calculation using the customer's peak 30-minute kW demand for the month and the average power factor for the month.

Measurement of Energy

Energy shall be measured by a suitable integrating instrument or instruments.

Metering Adjustments

At the option of the Company, service hereunder may be metered at voltage levels different from delivered voltages. In the event metered voltages exceed delivered voltages, before computing the charges, the actual measurement of energy, kVAr and Billing Maximum Load shall be decreased by one percent (1%). In the event delivered voltages exceed metered voltages, before computing the charges, the actual measurement of energy, kVAr and Billing Maximum Load shall be increased by one percent (1%).

Monthly Minimum Charge

For customers served at or above primary voltages, the Monthly Minimum Charge shall be the greater of the Billing Maximum Load Charge or the Connection Charge.

For customers served at secondary voltage, the Monthly Minimum Charge shall be the Connection Charge.

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

RATE LLF - LOW LOAD FACTOR SERVICE

Reconnection Charge

When the service has been turned off by Company for nonpayment of bills, a reconnection charge must be paid by customer before such service is reconnected. (See Section 12 of General Terms and Conditions for Electric Service).

Special Terms and Conditions

1. All service hereunder may be furnished through one meter, or through not more than one meter for the lighting service and one meter for the power service, unless the law requires that a separate service for exit lighting be installed, in which case an additional meter for the exit lighting will be installed by the Company.
2. Where service is metered at secondary voltage, as hereinabove designated, the service will normally be supplied from Company's distribution line transformers.
3. Where primary voltage, as hereinabove designated, is required, Company will furnish one transformation to a standard voltage, provided, however, that where the service supplied is three-phase and the voltage of the load side of such transformation is approximately 480 or 240 Volts delta and customer requires approximately 120/240 Volts three-wire, for lighting purposes, Company will supply the transformation to obtain such lighting voltage.
4. Where customer requests transformation to more than one standard voltage or service of a standard voltage at more than one location within his premises, Company will, at its option, furnish and maintain such additional transformation equipment and such interconnecting lines as may be necessary, provided, however, that customer shall bear the cost of furnishing the facilities which are in excess of those facilities furnished in paragraph 3 above. The right and title to all equipment so furnished by Company shall be and remain in Company.

   Should customer require a nonstandard voltage, customer shall, at his own expense, furnish and maintain all transformers and protective equipment therefore necessary in order to obtain such nonstandard voltage.
5. All wiring, pole lines, wires, and other electrical equipment and apparatus located beyond the point of connection of customer's service lines with the lines of Company are considered the distribution system of customer and shall be furnished, owned, and maintained by customer, except in the case of metering equipment and other equipment incidental to the rendering of service, if any, that is furnished, owned, and maintained by Company, and installed beyond the point of connection.
6. Unmetered electric service will be available under this rate schedule for the operation of municipal sirens (e.g., Fire, Tornado, Emergency Management, etc.) with three phase electric motors in excess of 7-1/2 horsepower capacity. Such municipal siren service will be billed monthly at the secondary connection charge rate, of this rate schedule, per delivery point.
7. Direct Current Fast Charging (DCFC) services will be offered under Rate LLF in exchange for a Fast Charge Fee. The Fast Charge Fee is composed of an energy charge of $0.205328 per kWh plus all applicable riders listed on Appendix A – List of Applicable Rate Adjustment Riders. The Fast Charge fee is intended to maintain near equivalence with the statewide average cost for fast charging. If the statewide average cost for fast charging exceeds the Fast Charge Fee by more than 20% a market adjustment fee will be added to the Fast Charge Fee $0.205328 energy rate and then current tracker rates to arrive at parity. The Fast Charge Fee may be adjusted quarterly.

Issued: **Effective:**

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

OPTIONAL RATE LLF - HIGH EFFICIENCY TOTAL ELECTRIC COMMERCIAL SERVICE

Availability

Available only for the electrical requirements of a three-phase total electric commercial building whose space conditioning requirements are provided by an energy efficient electric space conditioning system.

Character of Service

Electric energy supplied hereunder shall be alternating current, sixty Hertz, at any standard three phase voltage supplied by Company in the locality for which the service is requested.

Rate*

Connection Charge $28.08

Maximum Load Charge (Monthly)

Each KW of Billing Maximum Load ..... $12.21 per kW

Energy Charge

For all energy used per month ..... $0.068213 per kWh

*Subject to the riders listed on Appendix A – List of Applicable Rate Adjustment Riders.

Monthly Minimum Charge

The Minimum Charge shall be the Connection Charge.

Billing Maximum Load

Billing Maximum Load for the month shall be the Maximum Load for the month.

Measurement of Maximum Load and Energy

Maximum load shall be the maximum average number of kilowatts in the thirty-minute interval which the energy metered is greater than in any other thirty-minute interval in such month. When energy is metered through more than one meter the maximum loads, separately determined for each meter, shall be added together for determining the maximum load for the month.

Energy shall be measured by a suitable integrating instrument or instruments.

Metering Adjustments

At the option of the Company, service hereunder may be metered at voltage levels different from delivered voltages. In the event metered voltages exceed delivered voltages, before computing the charges, the actual measurement of energy, kVAr and Billing Maximum Load shall be decreased by one percent (1%). In the event delivered voltages exceed metered voltages, before computing the charges, the actual measurement of energy, kVAr and Billing Maximum Load shall be increased by one percent (1%).

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OPTIONAL RATE LLF - HIGH EFFICIENCY TOTAL ELECTRIC COMMERCIAL SERVICE

Reconnection Charge

When the service has been turned off by Company for nonpayment of bills, a reconnection charge must be paid by customer before such service is reconnected. (See Section 12 of General Terms and Conditions for Electric Service).

Special Terms and Conditions

1. The availability of the Rider is limited to the electrical requirements of a total electric commercial building whose air conditioning requirements are provided by energy efficient electric equipment. All air conditioning equipment within a total electric commercial building, based on equipment type, shall meet the following energy efficiency standards:

TYPE	SIZE	SEER/EER
Packaged Terminal Air Conditioners (PTAC) and Packaged Terminal Heat Pumps (PTHP)	All Sizes	MIN 10.9 EER
Unitary Air Conditioners (Air Cooled Split Systems and Heat Pumps)	Less Than 65,000 BTUH More Than 65,000 BTUH More Than 135,000 BTUH	MIN 13.0 SEER MIN 11.2 SEER MIN 11.0 SEER
Rooftop Units (Includes Rooftop Heat Pumps)	Less Than 65,000 BTUH 65,000 - 135,000 BTUH More Than 135,000 BTUH	MIN 13.0 EER MIN 10.8 EER MIN 10.4 EER
Water Source Heat Pumps (Including Building Loop Heat Pumps and Geothermal Heat Pump)	All Sizes	MIN 12.0 EER
Air Cooled Chiller	All Sizes	MIN 3.10 COP
Water Cooled Chiller	Less Than 150 Tons 150 - 300 Tons More Than 300 Tons	MIN 5.0 COP MIN 5.55 COP MIN 6.10 COP

In cases where any air conditioning equipment is not covered by the above energy standards, the Company shall have sole discretion as to whether such equipment qualifies in terms of the customer being eligible for this Rider.

To be eligible for this Rider, customers must demonstrate that Rate LLF would be the most cost effective rate to receive service and they otherwise meet the requirements of this Rider. customers taking service under this Rider prior to "Effective Date" are exempt from this requirement.

2. All service hereunder may be furnished through one meter, or through not more than one meter for the lighting service and one meter for the power service, unless the law requires that a separate service for exit lighting be installed, in which case an additional meter for the exit lighting will be installed by the Company.

3. Where service is metered at secondary voltage, as hereinabove designated, the service will normally be supplied from Company's distribution line transformers.

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OPTIONAL RATE LLF - HIGH EFFICIENCY TOTAL ELECTRIC COMMERCIAL SERVICE

4. Where primary voltage, as hereinabove designated, is required, Company will furnish one transformation to a standard voltage, provided, however, that where the service supplied is three phase and the voltage of the load side of such transformation is approximately 480 or 240 volts delta and customer requires approximately 120/240 volts three-wire, for lighting purposes, Company will supply the transformation to obtain such lighting voltage.

5. Where customer requests transformation to more than one standard voltage or service of a standard voltage at more than one location within his premises, Company will, at its option, furnish and maintain such additional transformation equipment and such interconnecting lines as may be necessary, provided, however, that customer shall bear the cost of furnishing the facilities which are in excess of those facilities furnished in paragraph 3 above. The right and title to all equipment so furnished by Company shall be and remain in Company.

   Should customer require a nonstandard voltage, customer shall, at his own expense, furnish and maintain all transformers and protective equipment therefore necessary in order to obtain such nonstandard voltage.

6. All wiring, pole lines, wires, and other electrical equipment and apparatus located beyond the point of connection of customer's service lines with the lines of Company are considered the distribution system of customer and shall be furnished, owned, and maintained by customer, except in the case of metering equipment and other equipment incidental to the rendering of service, if any, that is furnished, owned, and maintained by Company, and installed beyond the point of connection.

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1000 East Main Street
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RATE LLF - OPTIONAL TIME-OF-USE SERVICE

Availability

Available to customers whose electric service is provided under Rate LLF - Schedule for Low Load Factor Service (Rate LLF) and whose average Billing Maximum Load over the last twelve (12) months is greater than or equal to 1,000 kW. Customers receiving service under this schedule prior to July 1, 2019 with average Billing Maximum Load less than 1,000 kW, may continue to receive service under this schedule until such time they elect to receive service under an alternative rate schedule.

Rate*

Connection Charge Per Month

Secondary Delivery at a nominal voltage of 600 volts or lower	$ 22.83
Primary Delivery at a nominal voltage of 2,400 to 34,000 volts	$ 109.43
Transmission Delivery at a nominal voltage of 69,000 volts or higher	$ 360.20

Energy Delivery Charge Per Month *(Each kW of Billing Maximum Load)*

Secondary Delivery	$5.55 per kW
Primary Delivery	$4.65 per kW
Primary Delivery-dedicated service from the transmission system	$3.42 per kW
Transmission	$2.59 per kW

kVAr Charge ..... $0.28 per kVAr

Generation Charges

Demand Charge *(Each kW of Period Maximum Load)*

Summer Season	
Peak Billing Period	$ 8.04 per kW
Off-Peak Billing Period	$ 0.00 per kW
Winter Season	
Peak Billing Period	$ 4.27 per kW
Off-Peak Billing	$ 0.00 per kW
Spring/Fall Season	
All Hours	$ 1.89 per kW

Energy Charge *(Billing Period kWh)*

Summer Season	
Peak Billing Period	$ 0.085584 per kWh
Off-Peak Billing Period	$ 0.071517 per kWh
Winter Season	
Peak Billing Period	$ 0.078948 per kWh
Off-Peak Billing Period	$ 0.071517 per kWh
Spring/Fall Season	
All Hours	$ 0.071517 per kWh

*Subject to the riders listed on Appendix A – List of Applicable Rate Adjustment Riders.

Issued: **Effective:**

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

RATE LLF - OPTIONAL TIME-OF-USE SERVICE

On-Peak/Off-Peak Hours

Company shall consider the following as the on-peak/off-peak billing periods for each season. All hours shall be Eastern Standard Time.

Summer Season: *(June through September)*

Peak: 11:01 am through 6:00 pm

Off-Peak: All Other Hours

Winter Season: ***(December through March)***

Peak: 6:01 am through 2:00 pm and 6:01 pm through 9:00 pm

Off-Peak: All Other Hours

Spring/Fall Seasons: ***(April – May & October - November)***

Off-Peak: All Hours

Holidays:

The entire twenty-four (24) hours of the following holidays will be considered off-peak hours:

New Year's Day	Labor Day
Memorial Day	Thanksgiving Day
Independence Day	Christmas Day

Whenever any of the above holidays occur on a Sunday and the following Monday is legally observed as a holiday, the entire twenty-four (24) hours of such Monday will be considered as off-peak hours.

Whenever any of the above holidays occur on a Saturday and the preceding Friday is legally observed as a holiday, the entire twenty-four (24) hours of such Friday will be considered as off-peak hours.

Measurement of Billing Maximum Load, Period Maximum Load Energy and kVArs

Billing Maximum Load shall be measured by suitable instruments, and, in any month the Billing Maximum Load shall be the average number of kilowatts in the thirty-minute interval during which the energy metered is greater than in any other thirty-minute interval in such month.

Period Maximum Loads for the peak, and off-peak billing periods shall be measured by suitable instruments, and, for any billing period the Period Maximum Load shall be the average number of kilowatts in the thirty-minute interval during such billing period in which the energy metered is greater than in any other thirty-minute interval in such billing period.

Energy and KVArs shall be measured by suitable integrating instruments.

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RATE LLF - OPTIONAL TIME-OF-USE SERVICE

Metering Adjustments

Whenever the customer's maximum load and energy requirements are metered at a lower voltage than the delivered voltage, then the metered Billing Maximum Load, kVAr and the Period Maximum Loads shall be increased by one percent (1%) and the metered energy shall be increased by one percent (1%) before applying any other adjustment or computing the charges.

Whenever the customer's maximum load and energy requirements are metered at a higher voltage than the delivered voltage, then the metered Billing Maximum Load, kVAr and the Period Maximum Loads shall be decreased by one percent (1%) and the metered energy shall be decreased by one percent (1%) before applying any other adjustment or computing the charges.

Minimum Monthly Charge

The Monthly Minimum Charge shall be the Connection Charge.

Special Terms and Conditions

1. This Rider is available to any customer currently served under Rate LLF or Rider 10.1. New customers, or customers migrating to this Rider from another Rate Schedule, will be eligible to receive service under this Rider if they can demonstrate that Rate LLF would otherwise be the most cost-effective rate to receive service under.

2. Customer will enter into a written Agreement under the Program for an initial term of one (1) year with automatically renewing one (1)-year terms. customer may change to other eligible rates after the initial term of the Agreement or at the end of subsequent one (1)-year terms by giving sixty (60) days advance written notice prior to the expiration of the initial term or subsequent one (1)-year terms.

3. All provisions included in the currently approved Rate LLF shall apply except as provided for herein.

Duke Energy Indiana, LLC
1000 East Main Street
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RATE HLF - HIGH LOAD FACTOR SERVICE

Availability

Available to any customer contracting for a specified capacity of not less than 25 kW. Applicant must be located adjacent to an electric transmission or distribution line of Company that is adequate and suitable for supplying the service requested.

Character of Service

Alternating current having a frequency of sixty Hertz and furnished in accordance with the provisions set forth hereunder.

Rate*

Connection Charges per Month:

Secondary	$ 26.80
Primary and Primary Direct	$ 105.07
Transmission	$ 727.14

Maximum Load Charge *(Monthly)*

Transmission Line Service at nominal voltage of 138,000, 230,000 or 345,000 Volts

Each kW of Billing Maximum Load ..... $ 17.85 per kW

Transmission Line Service at nominal voltage of 69,000 Volts

Each kW of Billing Maximum Load ..... $ 18.72 per kW

Primary Direct Service at nominal voltage of 2,400 to 34,500 Volts

Each kW of Billing Maximum Load ..... $ 19.82 per kW

Primary Service at nominal voltage of 2,400 to 34,500 Volts

Each kW of Billing Maximum Load ..... $ 15.14 per kW

Secondary Service at nominal voltage of 480 Volts or lower

Each kW of Billing Maximum Load ..... $ 20.66 per kW

Energy Charge *(In addition to the Maximum Load Charge)*

Transmission Line Service at nominal voltage of 138,000, 230,000 or 345,000 Volts

For All Energy Used Per Month ..... $0.044226 per kWh

Transmission Line Service at nominal voltage of 69,000 Volts

For All Energy Used Per Month ..... $0.044143 per kWh

Primary Direct Service at nominal voltage of 2,400 to 34,500 Volts

For All Energy Used Per Month ..... $0.045068 per kWh

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RATE HLF - HIGH LOAD FACTOR SERVICE

Primary Service at nominal voltage of 2,400 to 34,500 Volts

For All Energy Used Per Month ..... $0.059861 per kWh

Secondary Service at nominal voltage of 480 Volts or lower

For All Energy Used Per Month ..... $0.054431 per kWh

KVAr Charge

For Each kVAr of the Monthly Billed kVAr Demand..... $0.28 per kVAr

*Subject to the riders listed on Appendix A – List of Applicable Rate Adjustment Riders.

Monthly Minimum Charge

The monthly minimum charge shall be the Maximum Load Charge.

Measurements of Maximum Load and Energy

Maximum Load shall be measured by suitable recording instruments provided by Company and be the customer's highest average thirty-minute kW load in the billing period.

When energy is measured through more than one meter the Maximum Loads, separately determined for each meter, shall be added together for determining the Maximum Load for the month.

Energy shall be measured by suitable integrating instruments provided by Company.

Metering Adjustments

At the option of the Company, service hereunder may be metered at voltage levels different from delivered voltages. In the event metered voltages exceed delivered voltages, before computing the charges, the actual measurement of energy, kVAr and Billing Maximum Load shall be decreased by one percent (1%). In the event delivered voltages exceed metered voltages, before computing the charges, the actual measurement of energy, kVAr and Billing Maximum Load shall be increased by one percent (1%).

Billing Maximum Load

Shall be the maximum average number of kilowatts in the thirty-minute interval which the energy metered is greater than in any other thirty-minute interval in such month. When energy is metered through more than one meter the maximum loads, separately determined for each meter, shall be added together for determining the maximum load for the month.

In no event shall the Billing Maximum Load be less than 25 kW.

Billing of kVAr

For customers who have pulse metering, the billed kVAr demand will be determined by trigonometric calculation using the customer's peak 30-minute kW demand for the month and the power factor coincident with the peak 30-minute kW demand for the month. For customers who do not have pulse metering, the billed kVAr demand will be determined by trigonometric calculation using the customer's peak 30-minute kW demand for the month and the average power factor for the month**.**

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RATE HLF - HIGH LOAD FACTOR SERVICE

Special Terms and Conditions

1. For customers taking transmission or primary service, customer shall furnish, own, and maintain, at his own expense, the complete substation structure and equipment, including switches and protective equipment, transformers and other apparatus, any or all of which is necessary for customer to take service at the standard primary or transmission line voltage selected by Company. Company will, however, furnish, own, operate, and maintain all necessary metering equipment. Failure of a customer to provide proper maintenance on facilities described hereinabove which results in premature equipment failure and/or interruption to the Company's other customers shall be considered negligent and the Company may require the customer to install protective equipment as specified by the Company in order to provide the necessary protection and isolation. Said protective equipment shall be furnished, owned, and maintained by the customer, however, in certain instances Company retains the option of requiring the customer to enter into a specific maintenance agreement with the Company. Company also retains the option of furnishing, owning, and maintaining said protective equipment as per "Standard Contract Rider No. 53 - Excess Facilities."

2. All wiring, pole lines, wires, and other electrical equipment and apparatus located beyond point of connection of customer's service lines with the lines of Company are considered the distribution system of customer and shall be furnished, owned, and maintained by customer, except in the case of metering equipment and other equipment incidental to the rendering of service, if any, that is furnished, owned and maintained by Company, and installed beyond point of connection.

3. The Company normally does not provide transformations within the transmission and/or primary service classifications as described in the transmission and primary maximum load charges. However, in the case of unusual service requests where the Company's existing facilities adjacent to the customer are inadequate, the Company may furnish such transformations upon customer paying the appropriate excess facilities charge. The Company shall not furnish, own, and maintain such transformers on an excess facilities basis solely for the purpose of modifying Paragraph 1 on the previous page.

4. The rates hereunder are predicated upon the supply of service being delivered at a single location in such a manner that the measurement of the various components of the service may be made through one metering installation, except that service metered at a voltage of 480 Volts or lower may be furnished through not more than one meter for the lighting service and one meter for the power service, unless it is required by law to install a separate service for exit lighting, in which case an additional meter will be installed for the exit lighting.

5. During certain scheduled periods of time, customers served at primary voltage and higher may perform normal maintenance or repair that will result in a partial or total reduction in electrical consumption during certain monthly billing periods. Such maintenance or repair period may be scheduled and agreed upon by customer and Company at least thirty (30) days prior to such period. There shall be a maximum of two (2) such scheduled periods in a twelve-month consecutive period not to exceed 14 days in total duration for both such periods.

   Whenever such maintenance or repair periods have been scheduled with and agreed to by Company, customer will be billed for the actual maximum load during such periods on the basis of the proration of the Maximum Load Charge. Such proration will be based on the ratio of the number of days in the scheduled maintenance or repair period, divided by thirty (30) days. The actual energy used during the maintenance or repair period will be billed according to the Energy Charge of this rate schedule.

   For all of the other days during the monthly billing period in which there has been a scheduled maintenance or repair period, customer will be billed for the maximum load, as determined by the Billing Maximum Load provision of this rate schedule, multiplied by the complement of the above computed prorate ratio. The Energy Charge will be computed on the actual energy used during the remaining portion of the monthly billing period.

   A $500.00 fee will be imposed on customers taking advantage of the Maintenance Period Provision, but only at those times when such periods are taken.

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1000 East Main Street
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OPTIONAL RATE HLF - TIME-OF-USE SERVICE

Availability

Available to customers whose electric service is provided under Rate HLF - Schedule for High Load Factor Service (Rate HLF) and whose average Billing Maximum Load over the last twelve (12) months is greater than or equal to 1,000 kW. Customers receiving service under this schedule prior to July 1, 2019 with average Billing Maximum Load less than 1,000 kW, may continue to receive service under this schedule until such time they elect to receive service under an alternative rate schedule.

Rate*

Connection Charge Per Month

Secondary Delivery at a nominal voltage of 600 volts or lower	$ 26.80
Primary Delivery at a nominal voltage of 2,400 to 34,000 volts	$ 105.07
Transmission Delivery at a nominal voltage of 69,000 volts or higher	$ 727.14

Energy Delivery Charge Per Month *(Each kW of Billing Maximum Load)*

Secondary Delivery	$21.88 per kW
Primary Delivery	$20.47 per kW
Primary Delivery-dedicated service from the transmission system	$18.45 per kW
Transmission	$17.74 per kW

kVAr Charge	$0.28 per kVAr

Generation Charges

Demand Charge *(Each kW of Period Maximum Load)*

Summer Season	
Peak Billing Period	$ 9.16 per kW
Off-Peak Billing Period	$ 0.00 per kW
Winter Season	
Peak Billing Period	$ 4.26 per kW
Off-Peak Billing	$ 0.00 per kW
Spring/Fall Season	
All Hours	$ 2.00 per kW

Energy Charge *(Billing Period kWh)*

Summer	
Peak Billing Period	$ 0.061949 per kWh
Off-Peak Billing Period	$ 0.045397 per kWh
Winter Season	
Peak Billing Period	$ 0.051359 per kWh
Off-Peak Billing Period	$ 0.045397 per kWh
Spring/Fall Season	
All Hours	$ 0.045397 per kWh

*Subject to the riders listed on Appendix A – List of Applicable Rate Adjustment Riders**.**

Issued: **Effective**

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1000 East Main Street
Plainfield, Indiana 46168

OPTIONAL RATE HLF - TIME-OF-USE SERVICE

On-Peak/Off-Peak Hours

Company shall consider the following as the on-peak/off-peak billing periods for each season. All hours shall be Eastern Standard Time.

Summer Season: *(June through September)*

Peak: 11:01 am through 6:00 pm

Off-Peak: All Other Hours

Winter Season: ***(December through March)***

Peak: 6:01 am through 2:00 pm and 6:01 pm through 9:00 pm

Off-Peak: All Other Hours

Spring/Fall Seasons: ***(April – May & October - November)***

Off-Peak: All Hours

Holidays:

The entire twenty-four (24) hours of the following holidays will be considered off-peak hours:

New Year's Day	Labor Day
Memorial Day	Thanksgiving Day
Independence Day	Christmas Day

Whenever any of the above holidays occur on a Sunday and the following Monday is legally observed as a holiday, the entire twenty-four (24) hours of such Monday will be considered as off-peak hours.

Whenever any of the above holidays occur on a Saturday and the preceding Friday is legally observed as a holiday, the entire twenty-four (24) hours of such Friday will be considered as off-peak hours.

Measurement of Billing Maximum Load, Period Maximum Load and Energy and kVArs

Billing Maximum Load shall be measured by suitable instruments, and, in any month the Billing Maximum Load shall be the average number of kilowatts in the thirty-minute interval during which the energy metered is greater than in any other thirty-minute interval in such month.

Period Maximum Loads for the peak, and off-peak billing periods shall be measured by suitable instruments, and, for any billing period the Period Maximum Load shall be the average number of kilowatts in the thirty-minute interval during such billing period in which the energy metered is greater than in any other thirty-minute interval in such billing period.

Energy and KVArs shall be measured by suitable integrating instruments.

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OPTIONAL RATE HLF - TIME-OF-USE SERVICE

Metering Adjustments

Whenever the customer's maximum load and energy requirements are metered at a lower voltage than the delivered voltage, then the metered Billing Maximum Load, kVAr and the Period Maximum Loads shall be increased by one percent (1%) and the metered energy shall be increased by one percent (1%) before applying any other adjustment or computing the charges.

Whenever the customer's maximum load and energy requirements are metered at a higher voltage than the delivered voltage, then the metered Billing Maximum Load, kVAr and the Period Maximum Loads shall be decreased by one percent (1%) and the metered energy shall be decreased by one percent (1%) before applying any other adjustment or computing the charges.

Minimum Monthly Charge

The Monthly Minimum Charge shall be the Connection Charge.

Special Terms and Conditions

1. This Rider is available to any customer currently served under Rate HLF. New customers, or customers migrating to this Rider from another Rate Schedule, will be eligible to receive service under this Rider if they can demonstrate that Rate HLF would otherwise be the most cost-effective rate to receive service under.

2. Customer will enter into a written Agreement under the Program for an initial term of one (1) year with automatically renewing one (1)-year terms. customer may change to other eligible rates after the initial term of the Agreement or at the end of subsequent one (1)-year terms by giving sixty (60) days advance written notice prior to the expiration of the initial term or subsequent one (1)-year terms.

3. All provisions included in the currently approved Rate HLF shall apply except as provided for herein.

Duke Energy Indiana, LLC
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Plainfield, Indiana 46168

EXPERIMENTAL RATE - DEMAND MANAGEMENT AND STABILITY PROGRAM

Availability

Available to any Customer currently contracting for service under Rate HLF or Rate LLF, and whose non-coincident peak demand is 5 MW or greater. In addition, Customer must be willing to curtail load. The minimum load to be curtailed is 75% of Customer's average on-peak demand as determined by Company. Customer must also commit to load levels and continued interruptible levels for a period of five (5) years. Company and Customer must enter into an agreement defining the terms and conditions of this Rider.

Customers will be on a first-come, first-served basis, with an aggregate amount of load limited to 100 MW, determined by the sum of each Customer's annual maximum non-coincident load. Applicant must be located adjacent to an electric transmission or distribution line of Company that is adequate and suitable for supplying the service requested. This experimental program will remain in effect, upon approval by the Commission, through December 31, 2025.

General

The rates and charges payable by Customer shall consist of a combination of the following components: (a) demand response incentives pursuant to the terms and conditions set forth in the Company's PowerShare Program; (b) MISO Real Time Pricing for a portion of Customer's load; and (c) modification of Company's HLF or LLF Rate Schedules for a portion of Customer's service that incorporates an on-peak/off-peak provision. All bills will be calculated and rendered using Eastern Standard Time.

Term

Customer and Company must enter into a five (5) year agreement ("Agreement") in which interruptible load will be maintained or increased. In no event shall Customer reduce load available for curtailment and/or shifted load and subsequently cause an increase in Company's peak power capacity requirements. An exception may be made to the extent that slight variations in Customer's average on peak demand may reduce the amount of load available for interruption. The Agreement shall contain an "evergreen" provision for subsequent one (1) year terms.

Stability Provision

By entering into the above refenced agreement, Customer commits to maintaining a significant level of production and power usage at the given Premise and account. On a monthly basis, Customer must maintain a non-coincident peak demand of at least 75% of the average on-peak demand and 75% of the average monthly energy usage as compared to the previous 12-month period prior to commencement of agreement. These baseline demand and usage levels must be agreed to by both Company and Customer and shall be included in the Agreement. Exceptions may be granted if Customer has a scheduled period of maintenance downtown which impacts demand and/or energy usage and Customer communicates the dates/times for the maintenance period prior to its commencement.

In the event Customer's demand and/or energy usage decreases below the above thresholds, Customer will immediately revert to Company's Rate HLF or Rate LLF as appropriate, without the application of this Rider. In addition, Customer will be required to refund one half (1/2) of all savings obtained from being on this Rider for the lessor of the previous three years or the commencement of the agreement.

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EXPERIMENTAL RATE - DEMAND MANAGEMENT AND STABILITY PROGRAM

Rate*

Additional Administrative Billing Charge

Due to complexity of bill preparation, the Customer Charge for the appropriate Standard Tariff Rate will be increased by $500 per month.

Standard Tariff Rate HLF or Rate LLF

Customer shall be billed for electric demand and energy using the Company's then current Rate HLF or Rate LLF up to and including, the Standard Tariff Load Cap ("Load Cap"), subject to all applicable Company Standard Contract Riders and Charges. The Load Cap shall be 75% of the Customer's annual average on peak demand as determined by Company, and shall be revised annually at the beginning of each contract year. Agreement on the Load Cap is a requirement for participation in the program.

Network and Ancillary Service Charges

All of Customer energy usage above the Load Cap will be charged the following depending upon delivered voltage levels:

Transmission Line Service at nominal voltage of 138,000, 230,000 or 345,000
For all kWh in excess of Firm Load level…… $0.006630 per kWh

Transmission Line service at nominal voltage of 69,000 Volts
For all kWh in excess of Firm Load level…… $0.009822 per kWh

Primary Direct Service at nominal voltage of 2,400 to 34,500 Volts
For all kWh in excess of Firm Load level…… $0.009561 per kWh

Primary Service at nominal voltage of 2,400 to 34,500 Volts
For all kWh in excess of Firm Load level…… $0.019500 per kWh

Secondary Service at nominal voltage of 480 Volts or Lower
For all kWh in excess of Firm Load level…… $0.022955 per kWh

MISO Real Time Pricing**

All of Customer's load above the Load Cap in any 30-minute demand interval shall be billed at the Midcontinent Independent System Operator ("MISO") Energy Market's Real Time Locational Marginal Pricing for CIN.PSI. The Real Time hourly values available at the time of billing, will be used for each 30-minute demand interval for billing purposes.

On-Peak and Off-Peak Billing Maximum Load

For calculating all demand related charges, the applicable Rate HLF or Rate LLF demand charge shall be applied to the On-Peak demand. Off-Peak demand greater than the On-Peak demand shall be billed at 50% of the applicable Rate HLF or Rate LLF demand charge. On and Off-Peak hours are defined below:

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EXPERIMENTAL RATE - DEMAND MANAGEMENT AND STABILITY PROGRAM

The Summer Peak Hours are defined as follows. For the months of May, June, July, August, September, and October, the time from 12:01 pm to 8:00 pm on weekdays shall be considered On-Peak, with all other hours, including all hours of the weekends and on the federally recognized holidays of Memorial Day, Independence Day and Labor Day, considered to be Off-Peak; and,

The Winter Peak Hours are defined as follows. For the months of January, February, March, April, November, and December, the time from 6:01 am to 11:00 am and 5:01 pm to 10:00 pm on weekdays shall be considered On-Peak, with all other hours, including all hours of the weekends and on the federally recognized holidays of Thanksgiving Day, Christmas Day, and New Year's Day considered to be Off-Peak.

Interruptible Provision / Demand Response

Company and Customer agree to participation in demand response through the Company's PowerShare® CallOption Program. Customer must select a program option that includes the potential for at least 75 hours of economic events as well as the maximum of 5 emergency events.

A. Mandatory Annual Test

A mandatory interruptible provision test will occur each contract year during Summer Peak Hours as defined above. Customer will be given a two (2) hour notice and will be required to curtail load to the Firm Load Level for the stated four (4) hour curtailment period.

B. Firm Load Level

Customer shall annually select its "Firm Load Level" which is the amount of Customer load which is not subject to curtailments by Company. In no event shall Customer Firm Load Level be greater than 25% of Customer's average on peak demand as established by company.

General Interruption Provisions/Continuity of Service

This rider and agreement shall not be construed as a promise or warranty by Company to provide continuous or uninterrupted electric service to Customer. This disclaimer shall include, but not be limited to, the Customer's designation of Firm Load Level. (Reference: Company Retail Electric Tariff, General Terms & Conditions – Section 16)

Special Terms and Conditions

1. All Special Terms and Conditions applicable under the Customer's Standard Tariff Rate HLF or Rate LLF apply and are incorporated herein by reference.

*Subject to the riders listed on Appendix A – List of Applicable Rate Adjustment Riders.

**Subject to:
Standard Contract Rider No. 66-A – Energy Efficiency Revenue Adjustment
Standard Contract Rider No. 68 – Midcontinent ISO Management Cost and Revenue Adjustment
Standard Contract Rider No. 70 – Reliability Adjustment

Duke Energy Indiana, LLC
1000 East Main Street
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EXPERIMENTAL RATE - MARKET PRICING PROGRAM

Availability

Available to Customers served under Rates LLF and HLF with a minimum monthly peak load of 1 MW. The incremental cost of any special metering required for service under this Program beyond that normally provided under the applicable Standard Tariff shall borne by the Customer. Customers must enter into a written service agreement with a minimum term of one year. Service under this Program will be limited to 100 MW in aggregate demand, determined by the sum of each Customer's annual maximum non-coincident load. This experimental program will remain in effect, upon approval by the Commission, through December 31, 2025.

Program Description

The Experimental Market Pricing Program is voluntary and offers Customers the opportunity to manage their electric costs by either shifting load from higher cost to lower cost pricing periods and adding new load during lower cost pricing periods. Binding Price Quotes will be sent to each Customer on a day-ahead basis. The program utilizes the Company's Rates HLF and LLF through the use of a Customer Baseline Load (CBL) and hourly prices above or below the CBL.

Customer Baseline Load

The CBL is one complete year of Customer hourly load data and is the basis for bills rendered under Rate LLF or Rate HLF (non-Rider 20). The CBL must be mutually agreeable to both the Customer and the Company. Agreement on the CBL is a requirement for participation in the Experimental Market Pricing Program.

Market Pricing Billing**

Customers participating in the Experimental Market Pricing Program will be billed monthly based on the following calculation:

$$\text{Market Pricing Bill}^* = BC + PC + RC + \sum_{t=1}^{n} \{ (CC_t + ED_t + ASC_t) \times (AL_t - CBL_t) \}$$

Where:

BC	=	Baseline Charge
PC	=	Program Charge
RC	=	Reactive Charge
CC_t	=	Market Charge for hour t
ED_t	=	Energy Deliver Charge for hour t
ASC_t	=	Ancillary Services Charge for hour t
AL_t	=	Customer Actual Load for hour t
CBL_t	=	Customer Baseline Load in hour t
n	=	Total number of hours in the billing period
t	=	And hour in the billing period

Baseline Charge (BC)

The Baseline Charge is independent of Customer's currently monthly usage based on Rate HLF or Rate LLF if no change in electricity usage pattern occurs (less applicable program charges). The Baseline Charge is calculated at the end of the billing period.

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The Baseline Charge will be calculated as follows:

BC = (Standard Bill @ CBL)

Where:

BC	=	Baseline Charge
Standard Bill @ CBL	=	Customer's bill for the specific month on the applicable Rate Schedule including applicable Standard Contract Riders using the CBL to establish the applicable billing determinants. Applicable kVAr reactive charges shall be excluded from the Baseline Charge.

The CBL shall be adjusted to reflect applicable metering adjustments under Rate HLF or Rate LLF.

Price Quotes

The Company will send to Customer, by 3:00 p.m. each day, Price Quotes to be charged the next day. Such Price Quotes shall include the applicable Market Charge, the Energy Delivery Charge and the Ancillary Services Charge.

The Company may send more than one-day-ahead Price Quotes for weekends and holidays identified in Company's tariffs. The Company may revise these prices by 3:00 p.m. the day before they become effective.

The Company is not responsible for failure of Customer to receive and act upon the Price Quotes. It is Customer's responsibility to inform Company of any failure to receive the Price Quotes by 5:00 p.m. the day before they become effective.

Market Charge (CC)

The Market Charge is a charge for generation. The applicable hourly Market Charge (Credit) shall be applied on an hour by hour basis to Customer's incremental (decremental) usage from the CBL.

Charge (Credit) For Each kW Per Hour From The CBL:

For kWh_t above the CBL_t, $CC_t = MGC_t \times ADD \times LAF$
For kWh_t below the CBL_t, $CC_t = MGC_t \times 90\% \times LAF$

Where:

ADD	=	Percent Adder
	=	120% for Rate HLF
	=	120% for Rate LLF
LAF	=	Loss Adjustment Factor
1.086	=	For Secondary Delivery
1.056	=	For Primary Delivery
1.040	=	For Primary Direct Delivery
1.036	=	for Transmission Delivery at 69,000 volts
1.024	=	for Transmission Delivery at 138,000 volts and higher

The kW Per Hour incremental or decremental usage from the CBL shall be adjusted to reflect applicable metering adjustments under the Rate HLF or Rate LLF.

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Energy Delivery Charge (EDC)

The hourly Energy Delivery Charge is a charge for using the transmission and distribution system to deliver energy to the Customer. The applicable hourly Energy Delivery Charge (Credit) shall be applied on an hour by hour basis to Customer's incremental (decremental) usage from the CBL.

Charge (Credit) For Each kW Per Hour From the CBL

Secondary Delivery ……..	$0.022130	Per kW per hour
Primary Delivery ……..	$0.018698	Per kW per hour
Primary Direct Delivery ……	$0.008771	Per kW per hour
Transmission Delivery at a nominal voltage of 69,000 volts ……..	$0.009036	Per kW per hour
Transmission Delivery at a nominal voltage of 138,000 volts or higher …..	$0.005853	Per kW per hour

The kW Per Hour incremental (or decremental) usage from the CBL shall be adjusted to reflect applicable metering adjustments under the Rate HLF or Rate LLF.

Reactive Charge

For Each kVAr of the Monthly Billed kVAr Demand ..... $0.28 per kVAr

For Customers who have pulse metering, the billed kVAr demand will be determined by trigonometric calculation using the customer's peak 30-minute kW demand for the month and the power factor coincident with the peak 30-minute kW demand for the month. For Customers who do not have pulse metering, the billed kVAr demand will be determined by trigonometric calculation using the Customer's peak 30-minute kW demand for the month and the average power factor for the month**.**

The kVAr Demand shall be adjusted to reflect applicable metering adjustments under the Rate HLF or Rate LLF.

Ancillary Services Charge

The hourly Ancillary Services Charge is a charge for:
- Scheduling, System Control & Dispatch
- Reactive and Voltage Control
- Regulation and Frequency Response
- Spinning Reserve
- Supplemental Reserve

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The applicable hourly Ancillary Services Charge (Credit) shall be applied on an hour by hour basis to Customer's incremental usage from the CBL.

Charge (Credit) For Each kW Per Hour From the CBL

Secondary Delivery ……..	$0.000825	Per kW per hour
Primary Delivery ……..	$0.000802	Per kW per hour
Primary Direct Delivery ……..	$0.000790	Per kW per hour
Transmission Delivery at a nominal voltage of 69,000 volts ……..	$0.000787	Per kW per hour
Transmission Delivery at a nominal voltage of 138,000 volts or higher …..	$0.000778	Per kW per hour

The kW Per Hour incremental (decremental) usage from the CBL shall be adjusted to reflect applicable metering adjustments under the Rate HLF or Rate LLF.

Program Charge

Company will provide Internet based communication software to be used to provide Customer with the Price Quotes. Customer will be responsible for providing its own Internet access. A charge of $150.00 per billing period per site shall be added to Customer's bill to cover the additional billing, administrative, and cost of communicating the hourly Price Quotes associated with the Experimental Market Pricing Program.

Customer may purchase from either Company or any other third-party suppliers any other necessary equipment or software packages to facilitate participation in this program. While Customers are encouraged to use such equipment or software packages to maximize benefits under this Program, it is not a requirement for program participation. It is Customer's responsibility to ensure the compatibility of third-party equipment or software packages with any Company owned equipment or software packages.

Special Terms and Conditions

A. Except as provided in this Rider, all terms, conditions, rates, and charges outlined in the Rate HLF or Rate LLF that the customer has been served under for the twelve months prior to participating in the Experimental Market Pricing Program will apply. Participation in the Experimental Market Pricing Program will not affect Customer's obligations for electric service under the Customer's current Rate Schedule.

B. The primary term of service is one (1) year consisting of a consecutive twelve-month period.

C. Customers who terminate their service agreement under this Rider No. 20 after the initial one (1) year term shall not be eligible to return to the program for twelve (12) months from the termination date.

D. Customers returning to the standard tariff shall have any historical demands in excess of the CBL, re-evaluated for establishment of applicable billing demands.

*Subject to the riders listed on Appendix A – List of Applicable Rate Adjustment Riders.

**Subject to:
Standard Contract Rider No. 66-A – Energy Efficiency Revenue Adjustment
Standard Contract Rider No. 68 – Midcontinent ISO Management Cost and Revenue Adjustment
Standard Contract Rider No. 70 – Reliability Adjustment

Issued: Effective:

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: Roger A Flick Dated: 9-9-19

Roger A. Flick