

**COPY**

**FILED**

AUG 15 2012

INDIANA UTILITY  
REGULATORY COMMISSION

**CITIZENS THERMAL**

**Verified Petition for Approval  
of  
Fuel Cost Adjustment for Steam Service  
Effective  
November 1, 2012**

**Cause No. 41969 – FAC27**

**Direct Testimony and Exhibits  
of  
Korlon L. Kilpatrick II  
and  
Robert R. Purdue**

**Filed  
August 15, 2012**

## TABLE OF CONTENTS

<u>Exhibit No.</u>	<u>Description</u>	<u>Tab</u>
1	Petition	1
2	Direct Testimony of Korlon L. Kilpatrick	2
3	Tariff	3
4	Schedules	4
5	Earnings Test	5
6	Direct Testimony of Robert R. Purdue	6

**BEFORE THE  
INDIANA UTILITY REGULATORY COMMISSION**

**PETITION OF THE BOARD OF DIRECTORS )  
FOR UTILITIES OF THE DEPARTMENT OF )  
PUBLIC UTILITIES OF THE CITY OF )  
INDIANAPOLIS, AS SUCCESSOR TRUSTEE )  
OF A PUBLIC CHARITABLE TRUST FOR ) CAUSE NO. 41969 FAC 27  
APPROVAL OF FUEL COST ADJUSTMENT )  
FOR STEAM SERVICE EFFECTIVE NOVEMBER 1, )  
2012, PURSUANT TO THE COMMISSION'S ORDER )  
IN CAUSE NO. 43821 AND APPLICABLE LAW )**

**VERIFIED PETITION**

The Board of Directors for Utilities of the Department of Public Utilities of the City of Indianapolis, as Successor Trustee of a Public Charitable Trust, d/b/a Citizens Thermal (“Petitioner”), respectfully represents and shows the Commission, as follows:

1. Petitioner is a municipal steam utility subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana, including certain sections of the Public Service Commission Act, as amended. Petitioner’s rates and charges and terms and conditions for steam service are subject to the approval of this Commission by virtue of the provisions of Ind. Code § 8-1-11.1-3(c)(9). Pursuant to Ind. Code § 8-1-11.1-3.1, Petitioner’s Board of Directors operates as both the board and the municipal legislative body for purposes of Ind. Code § 8-1.5-3-8(f). Petitioner’s principal office is at 2020 North Meridian Street, Indianapolis, Indiana 46202.

2. Petitioner is authorized to and is engaged in rendering steam utility service in Marion County, Indiana. It owns, operates, manages and controls plant and equipment, which

plant and equipment are used and useful for the distribution and furnishing of steam service to the public.

3. The books and records of Petitioner supporting the data, calculations and allegations contained in this Petition are available for inspection and review by the Commission and the Indiana Office of Utility Consumer Counselor.

4. The names and addresses of Petitioner's attorneys in this matter, to whom all correspondence and communications in this Cause should be sent, are:

Michael E. Allen (Attorney No. 20768-49)  
Citizens Energy Group  
2020 North Meridian Street  
Indianapolis, Indiana 46202

Michael B. Cracraft (Attorney No. 3416-49)  
Hackman Hulett & Cracraft, LLP  
111 Monument Circle, Suite 3500  
Indianapolis, Indiana 46204-2030

The foregoing attorneys are authorized to accept service of papers in this Cause on behalf of Petitioner. In addition, papers filed in this proceeding should be served on:

Korlon L. Kilpatrick II  
Manager, Rates & Business Applications  
Citizens Energy Group  
2020 North Meridian Street  
Indianapolis, Indiana 46202

5. This Verified Petition is an application for Commission approval of Petitioner's fuel cost adjustment to be effective November 1, 2012. It is filed in accordance with the Public Service Commission Act, as amended, and in compliance with Petitioner's rates and charges and terms and conditions for steam service approved by the Commission in Cause No. 43821 on May 11, 2010.

6. A copy of Petitioner's Standard Contract Rider No. 1 incorporating its proposed fuel cost adjustment is attached as Exhibit No. 3.

7. Petitioner's average cost of fuel for steam for the three (3) months of November 2012 through January 2013, after taking into consideration its estimated fuel costs and the actual fuel costs for the months of February through April 2012 is estimated to be \$0.50215 per therm, and after adjustment for Indiana Utility Receipts Tax, the proposed fuel cost adjustment is \$0.50928 per therm. This proposed fuel cost adjustment represents a decrease in the applicable steam rates and charges to be effective November 1, 2012. The data and calculations supporting such estimated fuel cost and proposed fuel cost adjustment are set forth in Exhibit No. 4, Schedules 1 through 6, and Exhibit No. 5, which are attached hereto and made a part hereof.

8. Petitioner seeks to make the proposed fuel cost adjustment effective November 1, 2012 for retail steam service rendered by Petitioner.

9. Petitioner is filing the proposed fuel cost adjustment tariff and supporting schedules consistent with the provisions of this Commission's October 30, 2007 Order in Cause No. 43201 approving the change from an annual FAC to a quarterly FAC. Each of the Commission's FAC-related requirements in said Order are included in this quarterly FAC filing.

10. Petitioner is filing concurrently herewith its prepared direct testimony and exhibits supporting the relief requested in this Verified Petition.

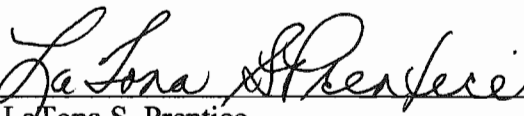
WHEREFORE, Petitioner respectfully requests that the Indiana Utility Regulatory Commission conduct a summary hearing on the matters set forth herein and thereafter enter an Order in this Cause:

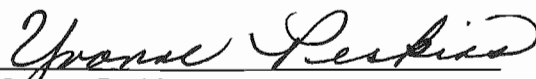
- (1) approving Petitioner's proposed Standard Contract Rider No. 1, as attached to this Verified Petition;

- (2) authorizing and approving the fuel cost adjustment set forth on Standard Contract Rider No. 1, and in the supporting schedules attached to this Petition, to become effective November 1, 2012; and
- (3) making such further orders and providing such further relief as may be appropriate and proper.

DATED this 15<sup>th</sup> day of August, 2012.

BOARD OF DIRECTORS FOR UTILITIES FOR THE  
DEPARTMENT OF PUBLIC UTILITIES OF THE CITY  
OF INDIANAPOLIS, AS SUCCESSOR TRUSTEE OF A  
PUBLIC CHARITABLE TRUST d/b/a CITIZENS  
THERMAL

By:   
LaTona S. Prentice  
Vice President  
Citizens Energy Group  
2020 North Meridian Street  
Indianapolis, Indiana 46202  
(317) 927-4529

ATTEST:   
Yvonne Perkins  
Vice President, Community Relations

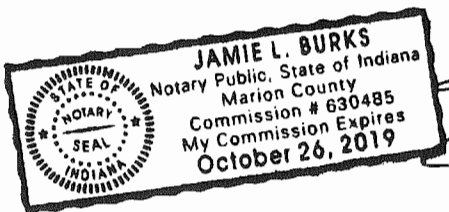
STATE OF INDIANA        )  
                                  ) SS:  
COUNTY OF MARION     )

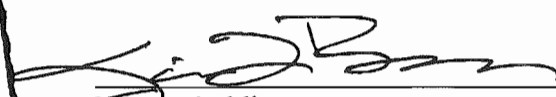
**VERIFICATION**

I, LaTona S. Prentice, being first duly sworn upon my oath, hereby affirm that I am the Vice President of the Board of Directors for Utilities of the Department of Public Utilities of the City of Indianapolis, as Successor Trustee of a Public Charitable Trust, d/b/a Citizens Thermal, Petitioner in the foregoing Petition, and that in such capacity I have reviewed the above and foregoing "Verified Petition" and that the matters contained therein are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
LaTona S. Prentice

Subscribed and sworn to before me a Notary Public in and for said County and State this 15<sup>th</sup> day of August, 2012.



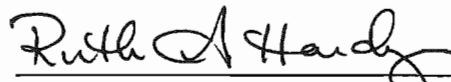
  
\_\_\_\_\_  
Notary Public  
Printed Signature: Jamie L. Burks  
Resident of Marion  
County

My Commission Expires:  
October 26, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of August, 2012, I served a copy of the foregoing Verified Petition upon the Indiana Office of Utility Consumer Counselor by delivery to the following address:

Randall C. Helmen  
Indiana Office of Utility Consumer Counselor  
115 West Washington Street, Suite 1500 South  
Indianapolis, Indiana 46204



Ruth A. Hardy, Attorney No. 29275-49  
Michael E. Allen, Attorney No. 20768-49  
2020 N. Meridian Street  
Indianapolis, IN 46202  
Telephone/Fax: (317) 927-4398 / (317) 927-4318  
Email: [rhardy@citizensenergygroup.com](mailto:rhardy@citizensenergygroup.com)  
[mallen@citizensenergygroup.com](mailto:mallen@citizensenergygroup.com)

Michael B. Cracraft, Attorney No. 3416-49  
Hackman Hulett & Cracraft, LLP  
111 Monument Circle, Suite 3500  
Indianapolis, IN 46204-2030  
Telephone: (317) 636-5401  
Attorneys for Citizens Thermal



1 **Q. PLEASE STATE YOUR NAME.**

2 A. My name is Korlon L. Kilpatrick II.

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

4 A I am employed by the Board of Directors for Utilities of the Department of Public  
5 Utilities of the City of Indianapolis (the "Board"). The City of Indianapolis (the "City")  
6 is the successor trustee of a public charitable trust and, acting through the Board of  
7 Directors for Utilities doing business as Citizens Energy Group, manages and controls a  
8 number of businesses, including the municipally-owned steam utility doing business as  
9 Citizens Thermal ("Citizens Thermal" or "Petitioner). Since October 2010, I have held  
10 the position of Manager, Rates & Business Applications.

11 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

12 A I hold a Bachelor of Arts degree with a major in Computer Science from Harvard College  
13 and a Master of Business Administration degree with a major in Finance from the  
14 University of North Carolina at Chapel Hill.

15 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND AND**  
16 **EXPERIENCE.**

17 A. Prior to joining Citizens in 2010, I worked for the Indiana Office of Utility Consumer  
18 Counselor ("OUCC") as a Utility Analyst. In that capacity, my work focused on  
19 economic and financial analysis of various regulatory issues including demand-side  
20 management / energy efficiency issues (DSM/EE) and cost of equity analysis. I regularly  
21 attended Midwest ISO stakeholder committee meetings and served as the Public

1 Consumer Advocate sector representative to Midwest ISO's Finance subcommittee.  
2 Prior to my employment with the OUCC, I was part of the senior management team of a  
3 start-up business, and prior to that, I worked for several years as a management  
4 consultant performing economic and financial analysis for clients in various industries.

5 **Q. WHAT ARE YOUR RESPONSIBILITIES AND DUTIES AS THE MANAGER,**  
6 **RATES & BUSINESS APPLICATIONS FOR CITIZENS ENERGY GROUP?**

7 A. I assist in development, implementation, and administration of Citizens Energy Group's  
8 regulated utilities' rates and charges and Terms and Conditions for Service. I have been  
9 responsible for the preparation of GCA changes, and other miscellaneous rate matters.  
10 Also, I am responsible for the preparation and filing of Citizens Thermal's quarterly fuel  
11 cost adjustment ("FAC") charges. I prepared or supervised the preparation of the  
12 schedules filed in connection with Petitioner's proposed FAC charge in this Cause.

13 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

14 A. Yes.

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS FAC**  
16 **PROCEEDING?**

17 A. To describe and provide support for the FAC charge Citizens Thermal is requesting  
18 Indiana Utility Regulatory Commission ("Commission") approval of in connection with  
19 the steam service it provides. Additionally, I shall provide a brief update on the Natural  
20 Gas Conversion Plan pursuant to the August 8, 2012 Order in I.U.R.C. Cause No. 44149.

21 **Fuel Adjustment Clause Calculation**

1 **Q. PLEASE IDENTIFY PETITIONER'S EXHIBIT NO. 1.**

2 A. Petitioner's Exhibit No. 1 is a copy of the Verified Petition filed in this matter, including  
3 Exhibit Nos. 3 through 5.

4 **Q. WERE THE VERIFIED PETITION AND ITS ATTACHED EXHIBITS**  
5 **PREPARED BY YOU OR UNDER YOUR DIRECT SUPERVISION?**

6 A. Yes, they were.

7 **Q. IS THE INFORMATION SET FORTH IN PETITIONER'S EXHIBIT NO. 1 AND**  
8 **EXHIBIT NOS. 3 THROUGH 5, TRUE AND CORRECT?**

9 A. Yes, to the best of my knowledge.

10 **Q. PLEASE DESCRIBE EXHIBIT NO. 3.**

11 A. Exhibit No. 3 is a copy of Standard Contract Rider No. 1. Citizens Thermal proposes to  
12 make Standard Contract Rider No. 1 part of its steam service tariff upon approval of the  
13 FAC charge by the Commission. Standard Contract Rider No. 1 sets forth the amount of  
14 the FAC charge that Citizens Thermal proposes to apply to the steam service rates under  
15 Rate 1, Rate 2 and Rate 3B, effective November 1, 2012.

16 **Q. PLEASE PROVIDE A BRIEF EXPLANATION OF EACH OF THE ABOVE-**  
17 **DESCRIBED RATE CLASSES.**

18 A. Citizens Thermal's steam tariffs contain three rates for steam service: Rate 1 – General  
19 Steam Service; Rate 2 – Demand Rate Service; and Rate 3 – Additional Summer Service.  
20 Under Rate 3, Citizens Thermal offers steam using: (1) Provision A (referred to as Rate  
21 3A), and (2) Provision B (referred to as Rate 3B). Additionally, certain steam customers

1 are served pursuant to customer-specific contracts that have been approved by the  
2 Commission.

3 Retail customers served under Rates 1 and 2 are impacted by the calculation of  
4 Citizens Thermal's FAC charge. All of the sales to customers served under Rates 1 and 2  
5 are included in the calculation of the proposed FAC charge.

6 The situation under Rate 3 is slightly different. During the summer months, the  
7 Covanta resource recovery facility has extra steam available. Rate 3A provides a reduced  
8 rate for eligible customers with the ability to use additional steam-driven equipment in  
9 the summer. The cost of summer steam is tracked separately and billed directly to the  
10 customers using it. Therefore, summer steam used under Rate 3A is not included in  
11 either the cost or revenue portions of the FAC calculation.

12 Sales of steam under Rate 3B apply when normal summer customer load is  
13 greater than the steam available for consumption from Covanta. If Rate 3 customers still  
14 require steam when no Covanta steam is available, any additional load is billed under  
15 Rate 3B. Since Citizens Thermal will be producing steam to meet the consumption needs  
16 of those customers being served under Rate 3B, the FAC charge applies to Rate 3B.  
17 Applying the FAC charge to Rate 3B allows those customers to contribute the same  
18 amount toward the cost of steam as Rate 1 and Rate 2 customers. All customer classes  
19 pay the same costs when steam must be generated or purchased to meet their load.

20 The charges paid by customers served under customer-specific contracts also are  
21 adjusted by the FAC factor and, therefore, included in the calculation of the FAC charge

1 and related variance recovery.

2 Citizens Thermal uses secondary steam primarily to generate electricity for sale to  
3 Indianapolis Power & Light Company (“IPL”) pursuant to a contract approved by the  
4 Commission in Cause No. 43117. Use of secondary steam for this purpose occurs when  
5 IPL calls upon Citizens Thermal to generate electricity, and for certain other limited  
6 circumstances. Since secondary steam is generally used only for the generation of  
7 electricity sold to IPL, it is not included in the costs recovered through the FAC charge.

8 For purposes of calculating the average cost of fuel, the total fuel cost and  
9 purchased steam cost, exclusive of purchases for Rate 3A and secondary steam are  
10 divided by the total sales volumes for Steam Rates 1, 2, 3B and customer-specific  
11 contracts. This calculation assures the same cost per unit applies to these rate classes and  
12 that each rate class pays no more or less than the average cost of fuel. The amount of fuel  
13 cost allocated to FAC-related sales is determined by multiplying the average cost of fuel  
14 per therm (which is the same for Rates 1, 2, 3B and customer-specific contracts) by FAC-  
15 related sales.

16 **Q. PLEASE DESCRIBE EXHIBIT NO. 4.**

17 A. Exhibit No. 4 consists of all the schedules required in support of the proposed FAC charge  
18 shown in Exhibit No. 3.

19 Schedule 1 reflects the resulting calculation of the proposed FAC charge based on  
20 the data and calculations in Schedules 1A, 2, 3, 4, 5 and 6 described below.

21 Schedules 1A and 2 provide information on forecasted sales and cost of fuel

1 during the three months beginning November 1, 2012. Schedules 3, 4, 5 and 6 contain  
2 and establish the actual cost of fuel Citizens Thermal incurred for its steam utility system  
3 during the period from February 2012 through April 2012, and those Schedules reconcile  
4 actual fuel costs to fuel adjustment cost revenue collected during the same period.

5 **Q. HAS CITIZENS THERMAL CHANGED THE METHODOLOGY USED IN**  
6 **MAKING THE CALCULATION SET FORTH IN EXHIBIT NO. 4, AND THE**  
7 **IDENTIFIED SCHEDULES, FROM THAT USED IN ITS PRIOR FAC FILINGS?**

8 A. No. FAC 27 reflects the use of the same methodology authorized and approved by the  
9 Commission in its October 30, 2007 Order in Cause No. 43201.

10 **Q. PLEASE DESCRIBE EXHIBIT NO. 5.**

11 A. Exhibit No. 5 is included for purposes of providing evidence related to the earnings test  
12 in accordance with the terms of the Settlement Agreement approved in Cause No. 43201.

13 **Q. IS THE BASE COST OF FUEL REFLECTED IN CITIZENS THERMAL'S**  
14 **RATES FOR STEAM SERVICE?**

15 A. No. In Cause No. 43201, the Commission authorized Citizens Thermal to recover all of  
16 its fuel costs through quarterly FAC charges. Therefore, a base cost of fuel has not been  
17 reflected in the base rates for steam service that became effective on and after November  
18 1, 2007.

19 **Q. WHAT IS THE AMOUNT OF THE FUEL COST ADJUSTMENT CHARGE**  
20 **CITIZENS THERMAL HAS APPLIED FOR IN FAC 27?**

21 A. The proposed fuel cost adjustment charge in FAC 27, which would become effective

1 November 1, 2012, is \$0.50928 per therm.

2 **Q. HOW DOES THE PROPOSED FUEL COST ADJUSTMENT CHARGE**  
3 **COMPARE TO THE EXISTING FUEL COST ADJUSTMENT CHARGE**  
4 **APPROVED IN FAC 26?**

5 A. The proposed fuel cost adjustment charge is 2.96% lower and represents a decrease of  
6 \$0.01554 per therm from the current fuel cost adjustment charge of \$0.52482 per therm,  
7 which was approved in Cause No. 41969 – FAC 26.

8 **Q. WHAT IS THE PERCENTAGE IMPACT ON RATE 1 AND RATE 2**  
9 **CUSTOMERS OF THE FAC 27 CHARGE WHEN COMPARED TO THE**  
10 **EXISTING FUEL COST ADJUSTMENT CHARGE?**

11 A. The proposed decrease of \$0.01554 per therm from the current fuel cost adjustment  
12 charge will result in an overall decrease of 0.81% and 1.35%, respectively in current rates  
13 for the typical customers served under Rate 1 and Rate 2.

14 **Q. WHAT IS THE VARIANCE CALCULATED IN FAC 27?**

15 A. The variance amount calculated for the three months reconciled in this FAC proceeding,  
16 February 2012 through April 2012, nets to an under recovery variance in the total amount  
17 of \$174,140. The under recovery variance for the 3-month period is primarily the result  
18 of lower than expected retail sales. The proposed FAC 27 charge to be effective  
19 November 1, 2012 includes a quarterly allocation of the foregoing reconciliation variance  
20 from this FAC proceeding and the three prior FAC proceedings. Therefore, the total

1 FAC variance included in the FAC 27 charge, including prior period variances, is an  
2 under collection of \$136,615.

3 Citizens Thermal continues to review its projections and operations on a quarterly  
4 basis prior to filing its FAC petition to reflect a fact-based estimation of its fuel cost.  
5 Occasionally, unpredictable expenses are incurred, resulting in fuel costs that vary from  
6 our estimates. The final outcome is that Citizens Thermal's customers pay dollar for  
7 dollar the cost of the steam they purchase. Citizens Thermal is constantly working to  
8 minimize that cost.

9 **Q. IS CITIZENS THERMAL SUBJECT TO THE "EARNINGS" TEST?**

10 A. Yes. On June 23, 2004, the Commission issued an Order approving the Stipulation and  
11 Settlement Agreement in Cause No. 41969 FC3S1 and FAC 04, which in part provided  
12 that Citizens Thermal would be subject to the "earnings" test in its FAC proceedings. For  
13 FAC 07, the "earnings" cap was established at \$7.85 million. This "earnings" cap was  
14 applicable through October 31, 2007. The Commission's Order in Cause No. 43201  
15 established the earnings cap at \$6,074,745, which applied to each "earnings" test  
16 beginning November 1, 2007 through May 16, 2010. On May 11, 2010, the Commission  
17 issued an order in Citizens Thermal's last rate case and the earnings cap was established  
18 at \$6,226,690, effective May 17, 2010.

19 **Q. UNDER THE SETTLEMENT AGREEMENT IN CAUSE NO. 43201, HOW IS**  
20 **THE "EARNINGS" TEST CALCULATION PERFORMED?**



1 A. Beginning with the first quarterly FAC application, whose “earnings” test period is the  
2 twelve months ended January 31, 2012, Citizens Thermal will apply the “earnings” test  
3 on a quarterly basis in its quarterly FAC applications. Exhibit No. 5 illustrates the  
4 application of the quarterly “earnings” test schedule.

5 In the Cause No. 43201 Settlement Agreement, the Parties agreed that the first  
6 quarterly FAC whose “earnings” test was to be conducted with the twelve months  
7 following Commission approval of the Settlement Agreement (i.e., the twelve months  
8 ended October 31, 2008); Citizens Thermal performed a quarterly “earnings” bank  
9 calculation starting with an amount in the “earnings” bank of zero. Beginning with the  
10 first quarterly FAC application whose “earnings” test period is the twelve months ended  
11 January 31, 2012, Citizens Thermal will continue filing a quarterly FAC, but will apply  
12 the “earnings” test on a quarterly basis, including the use of whatever amount has been  
13 accumulated in the quarterly “earnings” bank since the FAC whose “earnings” test was  
14 conducted with the twelve months ended October 31, 2008, as described above.

15 In FAC 13, Exhibit No. 2C, Schedule 1a, the first entry was made based on the  
16 comparison of the 12 months ending October 31, 2008 to the approved annual earnings of  
17 \$6,074,745. This resulted in the initial quarterly “earnings” bank entry. In this FAC 27,  
18 the income/(loss) of (\$1,106,199) for the 12-months ending April 30, 2012 compared  
19 with the prorated Commission authorized annual earnings from Cause No. 43821  
20 produces an additional entry of (\$7,332,889), for a total of (\$91,386,630) of accumulated  
21 bank dollars for the Quarterly “earnings” bank.

**Natural Gas Conversion Update**

1  
2 **Q. PLEASE PROVIDE AN UPDATE ON THE PROGRESS OF THE NATURAL**  
3 **GAS CONVERSION PLAN BEING IMPLEMENTED BY THE PETITIONER.**

4 A. On August 8, 2012, the Commission issued an Order in Cause No. 44149 approving the  
5 Stipulation and Settlement Agreement. That Order provided in pertinent part that  
6 “Petitioner shall include testimony regarding the progress and status of the Natural Gas  
7 Conversion Plan in each quarterly FAC proceeding until it has been completed.”  
8 Petitioner recently received permission from the Indiana Department of Environmental  
9 Management (IDEM) to start construction. However, Petitioner is still awaiting full  
10 approval from IDEM of the air permit modification for all external approvals to be met.  
11 Once IDEM approval is received, the initial phase of the Natural Gas Conversion Plan  
12 will begin. Petitioner will provide periodic progress and status reports in its future FAC  
13 proceedings in compliance with the foregoing requirement.

14 **Conclusion**

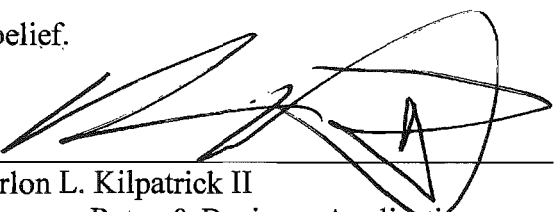
15 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

16 A. Yes, it does.

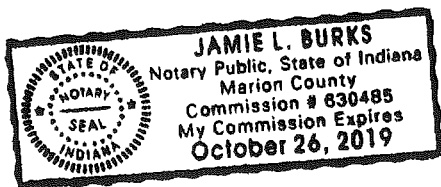
**VERIFICATION**


STATE OF INDIANA        )  
                                  ) SS:  
COUNTY OF MARION     )

The undersigned, Korlon L. Kilpatrick II, under penalties of perjury and being first duly sworn on his oath, says that he caused to be prepared and read the foregoing Direct Testimony and that the representations set forth therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Korlon L. Kilpatrick II  
Manager, Rates & Business Applications

Subscribed and sworn to before me a Notary Public in and for said County and  
State this 15<sup>th</sup> day of August, 2012.



  
\_\_\_\_\_  
Notary Public  
Printed Signature: Jamie L. Burks

My Commission Expires: October 26, 2019

My County of Residence: Marion

**Citizens Thermal  
2020 North Meridian Street  
Indianapolis, Indiana 46202**

**Twenty-Eighth Revised Page No. 201  
Superseding Twenty-Seventh Revised Page No. 201**

**STANDARD CONTRACT RIDER NO. 1  
FUEL COST ADJUSTMENT  
(Applicable to Rate 1 and Rate 2)**

A fuel cost adjustment shall be made in accordance with the following provisions:

- A. The fuel cost adjustment per therm shall be calculated by multiplying the Therms billed by an Adjustment Factor established according to the following formula:

$$\text{Adjustment Factor} = \frac{F}{S}$$

where:

1. "F" is the estimated expense of fuel based on a three-month average cost beginning with the month of November 1, 2012, and consisting of the following costs:
    - (a) the average cost of fuel burned for the production of steam in the Utility's plants, including only those items listed in Account 151;
    - (b) the average cost of purchases from the Indianapolis Resource Recovery Project (Covanta) of displaced net steam to mains.
  2. "S" is the estimated applicable sales in Therms for the same estimated period set forth in "F".
- B. The Adjustment Factor as computed above shall be further modified to allow the recovery of the utility receipts taxes and other similar revenue based tax charges occasioned by the fuel adjustment revenues.
- C. The Adjustment Factor shall be further modified to reflect the difference between fuel cost billed and fuel cost actually experienced during the three-month period ending April 30, 2012, and other Commission authorized adjustments as appropriate.
- D. The Adjustment Factor to be effective with meter readings on November 1, 2012 for all General Service and Demand Rate Accounts is \$0.50928 per Therm.

---

**Current base rates effective pursuant  
to I.U.R.C. Order in Cause No. 43821**

**Effective: November 1, 2012**

**CITIZENS THERMAL**  
Determination of Steam Fuel Cost Charge  
For November & December 2012, January 2013

Line No.	Month	Year	A	B	C	D
			Estimated Sales, Therms (Sch. 2)	Estimated Fuel Cost (Sch. 1A, col A)	Estimated Covanta Purchases (Sch. 1A, col.G)	Total Fuel Costs (F) (col. B + col. C)
1	November	2012	4,900,956	\$899,640	\$1,551,601	\$2,451,241
2	December	2012	6,971,988	1,908,293	1,480,559	3,388,852
3	January	2013	7,693,525	2,305,607	1,542,897	3,848,504
4	Total		19,566,469	\$5,113,540	\$4,575,057	\$9,688,597
5	Total FAC variance (Sch.6, ln.14)					\$136,615
6	Total Cost to be recovered in FAC (ln.4 + ln.5)					\$9,825,212
7	FAC factor to be recovered per therm of steam used (ln.6 /ln.4, col.A)					\$0.50215
8	FAC factor modified for Indiana Utility Receipts Tax (ln.7 / (1-1.4%)), per therm					\$0.50928

**CITIZENS THERMAL**  
**Estimated FAC Fuel Cost**

			A	B	C	D	E	F	G
			Usage, Tons	Usage in DTH <sup>1</sup>	Pric, \$/ton	Cost	Avg. cost, \$/Dth (D4/B4)		
<b>Coal</b>									
Line no.									
1	November	2012	9,631	213,808	\$66.619	\$641,608			
2	December	2012	19,695	437,229	66.659	1,312,849			
3	January	2013	20,292	450,482	68.269	1,385,315			
4	Total		49,618	1,101,519		\$3,339,772	\$3.0320		

			Usage, gal.	Usage in DTH <sup>2</sup>	Price, \$/Gal.	Cost	Avg. cost, \$/Dth (D8/B8)
<b>Fuel Oil</b>							
Line no.							
5	November	2012	310	42	\$2.6200	\$812	
6	December	2012	490	66	2.6200	1,284	
7	January	2013	340	46	2.6200	891	
8	Total		1,140	154		\$2,987	\$19.3961

			Dth	Price, \$/Dth	Cost
<b>Natural Gas-Perry K</b>					
Line no.					
9	November	2012	60,000	\$4.2870	\$257,220
10	December	2012	140,000	4.2440	594,160
11	January	2013	210,000	4.3781	919,401
12	Total		410,000	\$4.3190	\$1,770,781

<b>Total Fuel Cost</b>					
Line no.					
13	November	2012	\$899,640	(ln.1 + ln.5 + ln.9)	
14	December	2012	1,908,293	(ln.2 + ln.6 + ln.10)	
15	January	2013	2,305,607	(ln.3 + ln.7 + ln.11)	
16	Total		\$5,113,540		

			Base Primary Steam (+ winter incentive)			Additional Primary Steam			Total Covanta FAC Cost (c+f)
Line no.			Therms	\$/therm	Cost	Therms	\$/therm	Cost	
17	November	2012	4,106,937	\$0.377800	\$1,551,601	0	\$0.00000	\$0	\$1,551,601
18	December	2012	3,918,896	\$0.377800	1,480,559	0	0.00000	0	1,480,559
19	January	2013	4,083,900	\$0.377800	1,542,897	0	0.00000	0	1,542,897
20	Total		12,109,733		\$4,575,057	0		\$0	\$4,575,057

<sup>1</sup> Multiply tons by 22.2

<sup>2</sup> Multiply Gallons by 0.135

**CITIZENS THERMAL**

Estimated Sales Volume for the Twelve Months ending October 31, 2013

Line No.	Month	A Rate 1	B Rate 2	C Rate 3B	D Rate 4- Special Contract	E Total sales subject to FAC
	<b>First Quarter</b>					
1	Nov 2012	241,946	2,958,721	52,940	1,647,349	4,900,956
2	Dec 2012	506,101	3,967,215	579	2,498,093	6,971,988
3	Jan 2013	559,707	4,386,839	558	2,746,421	7,693,525
4	Quarter total	1,307,754	11,312,775	54,077	6,891,863	19,566,469
	<b>Second Quarter</b>					
5	Feb 2013	528,905	3,909,567	3,196	2,248,690	6,690,358
6	Mar 2013	394,043	3,204,636	62,880	1,759,097	5,420,656
7	Apr 2013	106,040	2,526,484	412,918	1,255,883	4,301,325
8	Quarter total	1,028,988	9,640,687	478,994	5,263,670	16,412,339
	<b>Third Quarter</b>					
9	May 2013	56,453	2,032,795	288,749	1,173,136	3,551,133
10	Jun 2013	37,224	1,734,727	194,864	1,116,285	3,083,100
11	Jul 2013	17,497	1,643,502	326,082	1,145,824	3,132,905
12	Quarter total	111,174	5,411,024	809,695	3,435,245	9,767,138
	<b>Fourth Quarter</b>					
13	Aug 2013	26,675	1,691,836	370,846	1,180,142	3,269,499
14	Sep 2013	42,180	1,800,630	185,507	1,190,404	3,218,721
15	Oct 2013	67,427	2,361,478	253,351	1,425,880	4,108,136
16	Quarter total	136,282	5,853,944	809,704	3,796,426	10,596,356
17	<b>Year total - Therms</b>	<b>2,584,198</b>	<b>32,218,430</b>	<b>2,152,470</b>	<b>19,387,204</b>	<b>56,342,302</b>
			Quarterly allocation factor			
18	First Quarter (Col.E, ln 4 / ln 17)		34.73%			
19	Second Quarter (Col.E, ln 8 / ln 17)		29.13%			
20	Third Quarter (Col. E, ln 12 / ln 17)		17.34%			
21	Fourth Quarter (Col.E, ln 16 / ln 17)		18.81%			
22	Total (ln 18 + ln 19 + ln 20 + ln 21)		100.00%			

**CITIZENS THERMAL**  
 Actual Cost of Fuel

Line No.			A	B	C	D	E	F	G	H
			<b>Coal</b>							
			Usage in Ton.	Rate \$/ton	Coal Inventory Usage Cost	CSX Lease Agreement Fee	Coal Misc. Invoices	Total Cost (C+D+E)		
1	February	2012	16,254	\$ 65.3666	\$ 1,062,441.89	\$2,738.98	\$10,740.47	\$1,075,921.34		
2	March	2012	13,569	65.5494	889,446.39	2,738.98	2,745.99	894,931.36		
3	April	2012	10,689	65.8650	704,038.07	2,738.98	13,766.27	720,543.32		
4	Total		40,512	\$65.5593	\$2,655,926.35	\$8,216.94	\$27,252.73	\$2,691,396.02		
			<b>Fuel Oil</b>							
			Usage in Gal.	Cost \$/Gal.	Fuel Oil Invent. Usage Cost	Fuel Oil Misc. Invoices	Total Cost (C+D)			
5	February	2012	398	\$2.61899	\$1,042.36	\$0.00	\$1,042.36			
6	March	2012	877	2.61899	2,296.85	0.00	2,296.85			
7	April	2012	986	2.61899	2,582.32	0.00	2,582.32			
8	Total		2,261	\$2.61899	\$5,921.53	\$0.00	\$5,921.53			
			<b>Natural Gas-Perry K</b>							
			Commodity Dth	Rate \$/Dth	Commodity Cost	Transportation rate, \$/Dth	Transp. Cost	Company Use	Metered Boiler Use	Total Cost (C+E+F+G)
9	February	2012	60,153	\$3.73620	\$224,743.64	\$0.7170	\$43,129.70	\$0.00	\$0.00	\$267,873.34
10	March	2012	54,899	3.82647	210,069.14	0.7170	39,362.58	0.00	0.00	249,431.72
11	April	2012	79,776	3.08914	246,438.88	0.7170	57,199.39	0.00	0.00	303,638.27
12	Total		194,828	\$3.49668	\$681,251.66		\$139,691.68		\$0.00	\$820,943.34
			<b>Total Fuel Cost</b>							
			(E + F + H)							
13	February	2012	\$1,344,837	(ln 1 + ln 5 + ln 9)						
14	March	2012	1,146,660	(ln 2 + ln 6 + ln 10)						
15	April	2012	1,026,764	(ln 3 + ln 7 + ln 11)						
16	Total		\$3,518,261							
			<b>Covanta Steam - Purchased</b>							
			Base primary Therms	Base Cost per Therm	Base Primary Cost	Winter Incentive Cost per Therm	Winter Incentive Payment	Total FAC 1/ Cost (C+E)		
17	February	2012	4,170,660	\$0.37780	\$1,575,675	\$0.12390	\$516,745	\$2,092,420		
18	March	2012	3,419,156	0.37780	1,291,757	0.00000	0	1,291,757		
19	April	2012	2,970,890	0.37780	1,122,402	0.00000	0	1,122,402		
20	Total		10,560,706	\$0.37780	\$3,989,834	\$0.12952	\$516,745	\$4,506,579		

1/ Total FAC Cost does not include Summer Steam





**CITIZENS THERMAL**  
 Calculation of Actual FAC Variance  
 For the period of: February 2012 through April 2012

Line No.		A	B	C	D
		February	March	April	Total
<u>Steam Sales Volumes (therms)</u>					
1	Steam Rate No. 1 (Sch. 4, col.A)	340,263	186,449	126,299	653,011
2	Steam Rate No. 2 (Sch. 4, col.B)	3,469,242	2,569,144	2,216,695	8,255,081
3	Steam Rate No. 3B (Sch. 4, col.D)	18,646	190,293	189,197	398,136
4	Special Contract (Sch. 4, col.E)	1,992,938	1,581,168	1,451,007	5,025,113
5	Total Therm Sales (In 1 + In 2 + In 3 + In 4)	<u>5,821,089</u>	<u>4,527,054</u>	<u>3,983,198</u>	<u>14,331,341</u>
<u>Actual Cost of FAC related Fuel Incurred</u>					
6	Cost of fuel (Sch. 3, lines 13, 14 & 15)	\$1,344,837	\$1,146,660	\$1,026,764	\$3,518,261
7	Cost of Purchased Fuel (Sch. 3, col. F, lines 17, 18 & 19)	<u>2,092,420</u>	<u>1,291,757</u>	<u>1,122,402</u>	<u>4,506,579</u>
8	Total cost of Steam (In 6+ In 7)	<u>\$3,437,257</u>	<u>\$2,438,417</u>	<u>\$2,149,166</u>	<u>\$8,024,840</u>
<u>Calculation of FAC Recovery</u>					
9	FAC rate Cause No. 41969-FAC 24	\$0.55642	\$0.55642	\$0.55642	
10	Actual cost of fuel billed including Utility Receipts Tax ( In 5 * In 9)	\$3,238,970	\$2,518,943	\$2,216,331	\$7,974,244
11	Actual cost of fuel billed excluding Utility Receipts Tax ( In 10 * ( 1 - 1.4% ))	\$3,193,624	\$2,483,678	\$2,185,302	\$7,862,604
12	Variance from Cause No. 41969-FAC 24 (-\$99,908/ 3)	\$3,968	\$3,968	\$3,968	\$11,904
13	Fuel cost recovered to be reconciled with fuel cost incurred ( In 11 - In 12)	<u>\$3,189,656</u>	<u>\$2,479,710</u>	<u>\$2,181,334</u>	<u>\$7,850,700</u>
14	Fuel cost variance (over)/under recovery ( In 8 - In 13)	<u>\$247,601</u>	<u>(\$41,293)</u>	<u>(\$32,168)</u>	<u>\$174,140</u>

**CITIZENS THERMAL**  
 Allocation of Actual Fuel Cost Variances  
 For the Period of: February 2012 through April 2012

<u>Line No.</u>	<u>Calculation of Total Fuel Cost Variances</u>		
1	February 2012 (Sch.5, ln.14, col.A)		\$247,601
2	March 2012 (Sch.5, ln.14, col.B)		(41,293)
3	April 2012 (Sch.5, ln.14, col.C)		(32,168)
4	Total Variance from this Cause		<u>\$174,140</u>
		A	Variance
	<u>Distribution of Variances to Quarters</u>	<u>% sales</u>	<u>(ln. 4 * col. A)</u>
5	Nov 2012 - Jan 2013 (Sch. 2, ln. 18)	34.73%	\$60,479
6	Feb 2013 - Apr 2013 (Sch. 2, ln. 19)	29.13%	50,727
7	May 2013 - Jul 2013 (Sch. 2, ln. 20)	17.34%	30,196
8	Aug 2013 - Oct 2013 (Sch. 2, ln. 21)	<u>18.81%</u>	<u>32,758</u>
9	Total (ln 5 + ln 6 + ln 7 + ln 8)	100.01%	<u>\$174,160</u>
	<u>Calculation of Variance for this Cause</u>		
10	Cause No. 41969-FAC 24 (Sch. 6, ln.8)		(\$139,926)
11	Cause No. 41969-FAC 25 (Sch. 6, ln.7)		226,705
12	Cause No. 41969-FAC 26 (Sch. 6, ln.6)		(10,643)
13	Cause No. 41969-FAC 27 (ln.5)		<u>60,479</u>
14	Total FAC variance to be included in this FAC (Over)/Underrecovery		<u>\$136,615</u>

**Citizens Thermal**  
Quarterly Net Operating Income Earnings Test

Line No.	12 Months Ended		FAC No.	Net Operating Income	Authorized	Differential
	Month	Year				
1	April	2012	27	\$ (1,106,199)	\$ 6,226,690	\$ (7,332,889)
2	January	2012	26	(218,418)	6,226,690	(6,445,108)
3	October	2011	25	1,789,914	6,226,690	(4,436,776)
4	July	2011	24	2,789,897	6,226,690	(3,436,793)
5	April	2011	23	2,558,834	6,220,029	(3,661,195)
6	January	2011	22	1,615,162	6,182,979	(4,567,817)
7	October	2010	21	(259,809)	6,144,681	(6,404,490)
8	July	2010	20	(1,544,951)	6,106,383	(7,651,334)
9	April	2010	19	(4,190,753)	6,074,745	(10,265,498)
10	January	2010	17 & 18	(4,444,628)	6,074,745	(10,519,373)
11	October	2009	16	(3,154,420)	6,074,745	(9,229,165)
12	July	2009	15	(1,651,593)	6,074,745	(7,726,338)
13	April	2009	14	1,802,588	6,074,745	(4,272,157)
14	January	2009	13	2,797,947	6,074,745	(3,276,798)
15	October	2008	12	3,913,846	6,074,745	(2,160,899)
16				<u>\$ 697,417</u>	<u>\$ 92,084,047</u>	<u>\$ (91,386,630)</u>
17	NOI to be Refunded					\$ -
18	Times:Filing Frequency					<u>25.00%</u>
19	Amount to be Refunded					<u>\$ -</u>

Note: Per IURC Order in Cause No. 43201, the earnings test will be performed each quarterly FAC through the 12-months ending with 1/31/2012. The 1/31/2012 balance of the Quarterly earnings bank will replace the Annual earnings bank that would have been calculated through 12/31/011.

Authorized NOI (effective Cause No. 43821) \$ 6,226,690

**Citizens Thermal**  
**Net Operating Income Statement**  
**For the Twelve Months Ended April 30, 2012**  
**(Unaudited)**

Line  
No.

1	Operating Revenues	<u>\$65,173,308</u>
	<u>Operating Expenses</u>	
2	Operation and maintenance expenses	\$60,476,548
3	Depreciation and Amortization expense	4,648,792
4	Total Taxes	1,154,166
5	Total Operating Expenses	<u>\$66,279,506</u>
6	Net Operating Income (In 1 - In 5)	<u><u>(\$1,106,199)</u></u>

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Robert R. Purdue. My business address is 366 Kentucky Avenue,  
3 Indianapolis, Indiana, which is the address for the Perry K Steam Plant owned and  
4 operated by the Board of Directors for Utilities of the Department of Public Utilities  
5 of the City of Indianapolis, as Successor Trustee of a Public Charitable Trust, d/b/a  
6 Citizens Thermal (“Citizens” or “Utility”).

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

8 A. I am employed as Director of Thermal Operations for Citizens Energy Group.

9 Q. HOW LONG HAVE YOU HELD THAT POSITION?

10 A. Since January 2003. In November 2000, I was hired by the Utility as the Operations  
11 & Maintenance Manager for the Perry K Steam Plant.

12 Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND AND  
13 EXPERIENCE.

14 A. Immediately prior to my employment with Citizens in November 2000, I was an  
15 employee of Indianapolis Power & Light Company (“IPL”) and worked at the Perry  
16 K Steam Plant. I have over 18 years of experience with the operating side of the Perry  
17 K Steam Plant, over 6 years of experience in maintenance at the Plant, and 9 years  
18 experience in the management of the steam business.

19 Q. WHAT ARE YOUR RESPONSIBILITIES AND DUTIES AS THE DIRECTOR  
20 OF STEAM?

21 A. As the Director of Thermal Operations for Citizens, I participate in all aspects of the

1 oversight and operation of the Perry K Steam Plant, which includes the purchase and  
2 delivery of the fuel that Citizens uses for the production of steam and electricity. As  
3 part of this activity, I also supervise Citizens' fuel procurement process, including the  
4 negotiation and administration of coal purchase and transportation contracts.

5 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

6 A. Yes. Starting with Cause No. 41969 FAC 08, I have submitted prepared direct  
7 testimony on behalf of the Utility.

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS FAC**  
9 **PROCEEDING?**

10 A. The purpose of my testimony is to generally address the subject of coal procurement  
11 for Citizens.

12 **Q. EARLIER IN YOUR TESTIMONY YOU REFERRED TO COAL PURCHASE**  
13 **CONTRACTS. PLEASE EXPLAIN THE PROCESS UNDER WHICH**  
14 **CITIZENS NEGOTIATES AND ENTERS INTO COAL CONTRACTS.**

15 A. Citizens generally purchases coal under contracts of one year or more in order to  
16 assure a dependable supply of adequate quantities of coal with consistent quality  
17 characteristics is delivered to the Perry K Steam Plant at a competitive price.  
18 Contract coal supply proposals are secured from producers and evaluated thoroughly,  
19 taking into account coal quantity and quality (which must be low-sulfur, compliance  
20 coal), transportation alternatives and price, among other factors. The coal producer  
21 (or producers) whose compliance coal offers the best value for Citizens, particularly

1 with regard to overall utilization costs, is selected for further negotiations, with the  
2 ultimate goal to secure a written contract or contracts for the delivery of compliance  
3 coal. As an example of that process, Citizens recently entered into a contract with a  
4 producer to provide coal over a 3-year term, which ends on December 31, 2013. For  
5 calendar years 2010 through 2013, the quantity of coal to be delivered to Citizens will  
6 be 175,000 tons, plus or minus 10%. Citizens must give the coal producer its  
7 estimated annual nominations at least 90 days prior to the beginning of each contract  
8 year and include a monthly breakdown of the amount of coal requested. Coal is  
9 priced FOB railcar and the price per ton changes by year. Finally, the coal  
10 procurement contract contains provisions governing sources of the coal, quality of the  
11 coal, invoicing and payment. Transportation of coal to the Perry K plant is provided  
12 by Indiana Southern Railroad (ISSR) or Indiana Railroad (INRD) and CSX. Pricing  
13 of transportation is set utilizing Private Price List and Contract CXST 36771, issued  
14 July 1, 2009, and Private Pricing Authority CSXT-C-46031(1) issued January 1,  
15 2011. Effective July 1, 2012, the transportation price for CXST 36771 was \$8.39 per  
16 ton. Effective January 1, 2011, our coal supplier notified Citizens that the coal supply  
17 for 2011 would be supplied by the Bear Run mine, which is served by INRD. INRD  
18 transportation pricing, using the CSXT-C-46031 (1) Private Pricing effective July 1,  
19 2012, was \$9.58 per ton. However, the coal supplier reserves the right to supply coal  
20 from alternate sources that are served by ISSR. Both pricing structures are subject to  
21 quarterly price adjustments.



1 Q. HOW DOES THE COST OF COMPLIANCE COAL PURCHASED BY  
2 CITIZENS PURSUANT TO CONTRACTS WITH PRODUCERS COMPARE  
3 WITH THE COST OF COMPLIANCE COAL ON THE OPEN MARKET?

4 A. Citizens purchases approximately 175,000 tons of coal per year, which has decreased  
5 the past couple of years from 230,000 tons. Citizens is considered by coal producers  
6 to be an “industrial” consumer of coal, as opposed to a much larger “utility”  
7 consumer of coal. Generally speaking, the larger electric “utility” purchasers of coal  
8 have much more market power than Citizens and, as a result, often they are able to  
9 negotiate lower coal prices than Citizens can negotiate. However, in comparing  
10 statistics periodically compiled by the Platts Coal Trader, I believe that Citizens has  
11 negotiated competitive coal procurement contracts that provide the best terms and  
12 conditions possible under the circumstances we face. The spot coal price for Illinois  
13 Basin Coal as of June 11, 2012 was \$50/ton for 2.5 lb sulfur coal and the lookout  
14 price for calendar year 2013 is estimated to be \$51/ton, which reflects the changing  
15 market dynamics of compliance coal contracts expiring and the effect of low natural  
16 gas prices on coal generation by electric utilities. Therefore, our current contract  
17 price of \$53.56 per ton of coal reaffirms the opinion set forth in my testimony that  
18 Citizens has negotiated a competitive coal contract for its customers through  
19 December 2013. On January 1, 2013, Citizens will experience an increase of 3% as  
20 part of the current coal contract.

21 Q. BASED UPON YOUR EXPERIENCE AT THE PERRY K STEAM PLANT

1           **BOTH WITH IPL AND NOW WITH CITIZENS, DO YOU HAVE AN**  
2           **OPINION AS TO WHETHER CITIZENS HAS PURCHASED COAL AT THE**  
3           **LOWEST PRICES REASONABLY POSSIBLE?**

4    A.    I do.

5    Q.    **WHAT IS THAT OPINION?**

6    A.    In my opinion, Citizens has purchased its compliance coal at prices as low as  
7           reasonably possible.

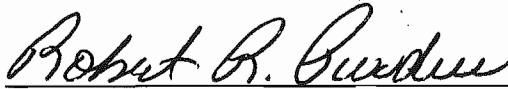
8    Q.    **DOES THIS CONCLUDE YOUR DIRECT TESTIMONY IN THIS**  
9           **PROCEEDING?**

10   A.    Yes, it does.

**VERIFICATION**

STATE OF INDIANA        )  
                                  ) SS:  
COUNTY OF MARION     )

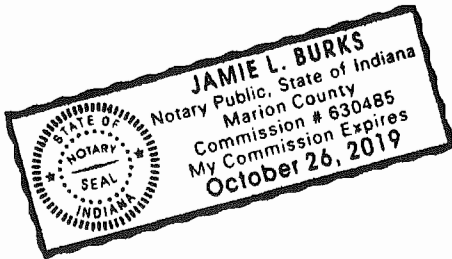
The undersigned, Robert R. Purdue, under penalties of perjury and being first duly sworn on his oath, says that he caused to be prepared and read the foregoing Direct Testimony; and that the representations set forth therein are true and correct to the best of his knowledge, information and belief.

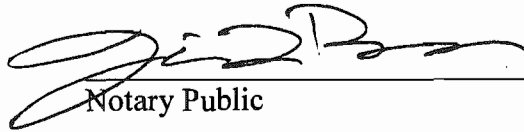


Robert R. Purdue  
Director of Thermal Operations for Citizens Energy Group

Subscribed and sworn to before me a Notary Public in and for said County and

State this 15<sup>th</sup> day of August, 2012.



  
Notary Public

Printed Signature: Jamie L. Burks

My Commission Expires: October 26, 2019

My County of Residence: Marion