

# 2019/2020 Integrated Resource Plan



**Non-Technical Summary**

## I. Introduction

Southern Indiana Gas and Electric Company d/b/a Vectren a CenterPoint Energy Company's ("Vectren") 2019/2020 Integrated Resource Plan is submitted in accordance with the requirements of the Indiana Utility Regulatory Commission (IURC or Commission) and the guidance provided in the Commission's recent orders related to the preferred portfolio described in Vectren's previous 2016 Integrated Resource Plan ("IRP"). The preferred portfolio in Vectren's previous 2016 IRP contemplated replacement of some of Vectren's coal fleet by the end of 2023 with a mix of renewable, energy efficiency and gas resources while retaining other coal resources. To implement this plan, Vectren filed two cases seeking Certificates of Public Convenience and Necessity ("CPCN") to (1) own and operate a 50 MW solar project located on its system (the "Troy Solar Project"), (2) install equipment designed to achieve compliance with environmental regulations in order to continue operation of its 270 MW Culley Unit 3 beyond 2023 and construct a 700-850 MW Combined Cycle Gas Turbine ("CCGT"). The Commission approved issuance of CPCNs authorizing the construction of the Troy Solar Project and Culley Unit 3 compliance projects. The Commission order denying a CPCN for the 700-850 MW CCGT urged Vectren to:

- Focus on outcomes that reasonably minimize the potential risk of an asset becoming uneconomic in an environment of rapid technological innovation;
- Fully consider options that provide a bridge to the future;
- Utilize a request for proposals ("RFP") to determine the price and availability of renewables; and
- Consider resource diversity and alternatives that provide off ramps that would allow Vectren to react to changing circumstances.

Vectren began its 2019/2020 IRP process in April 2019 with the objective of engaging in a generation planning process responsive to the Commission's guidance and seeking input from a variety of stakeholders. As part of its 2019/2020 IRP process, Vectren's evaluation has focused on exploring all new and existing supply-side and demand side resource options to reliably serve Vectren customers over the next 20 years. While the

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fundamentals of integrated resource planning were adhered to in developing the 2016 IRP, Vectren has enhanced its process and analysis in several ways. These enhancements include, but are not limited to the following:

- Issuance of an All-Source RFP to provide current market project pricing to be utilized in IRP modeling and potential projects to pursue, particularly for renewable resources such as wind and solar;
- An exhaustive review of reasonable options that leverage existing coal resources;
- increased participation and collaboration from stakeholders on all aspects of the analysis, inputs and resource evaluation criteria, with specific considerations and responses from Vectren;
- An encompassing analysis of wholesale market dynamics that accounts for MISO developments and market trends;
- The use of a more sophisticated IRP modeling tool, Aurora, which provided several benefits (simultaneous evaluation of many resources, evaluation of portfolios on an hourly basis and consistency in modeling, including least cost long-term capacity expansion planning optimization, simulated dispatch of resources and probabilistic modeling); and
- A more robust risk analysis, which encompasses a broad consideration of risks and an exploration of resource performance over a wide range of potential futures.

Based on this planning process and detailed analysis, Vectren has selected a preferred portfolio plan that significantly yet prudently diversifies the resource mix for its generation portfolio with the addition of significant solar and wind energy resources, the retirement or exit of four coal units, and continued investment in energy efficiency. These resources are complemented with dispatchable resources including continued operation of Culley Unit 3 and the addition of two flexible natural gas Combustion Turbines (CTs). The gas units represent a much smaller portion of Vectren's generation portfolio as compared to the 2016 IRP preferred portfolio while still providing reliable capacity and energy. The highly dispatchable and fast-ramping gas units are an important match with the significant renewable investment, enabling Vectren to maintain constant electric supply during

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potentially extended periods of low output from renewable energy sources. The units ramp quickly and provide load following capability, complimenting renewable energy production, which is expected to grow throughout the MISO footprint. Vectren's preferred portfolio reduces its cost of providing service to customers over the next 20 years by more than \$320 million as compared to continuing with its existing generation fleet. Additionally, the preferred portfolio reduces carbon dioxide output by approximately 67% by 2025 and 75% by 2035 when compared to 2005 levels, which helps Vectren's parent company, CenterPoint Energy, achieve its commitments to environmental stewardship and sustainability, while meeting customer expectations for clean energy that is reliable and affordable.

Vectren's preferred resource plan reduces risk through diversification, reduces the cost to serve load over the next 20 years and provides the flexibility to continue to evaluate and respond to future needs through subsequent IRPs. The preferred portfolio has several advantages: including: 1) Energy supplied by this portfolio is generated primarily through a significant amount of near-term renewable solar and wind projects that take advantage of the Investment Tax Credit and the Production Tax Credit. This lowers portfolio costs and takes advantage of current tax-advantaged assets. 2) Two new, low-cost gas combustion turbines, continued use of Vectren's most efficient coal unit (Culley 3) and new battery storage resources, provide resilient, dispatchable power to Vectren's system that is complementary to significant investment in new intermittent renewable resources. This is very important, as coal plants, which have provided these attributes in the past, continue to retire in MISO Zone 6. 3) The portfolio provides flexibility to adapt to and perform well under a wide range of potential future legislative, regulatory, and market conditions. The preferred portfolio performed well under CO<sub>2</sub>, methane constraints, and other related regulations such as a fracking ban. The cost position of this portfolio that is backed up by the two combustion turbine capacity resources does not change because the gas turbines predominantly run during peak load conditions. This provides a financial hedge against periodic instances of high market energy and capacity prices, while also providing reactive reserves and system reliability in times of extended renewable

generation droughts, i.e., cloud cover and low wind. 4) It reasonably balances energy sales against purchases to remain poised to adapt to market shifts. 5) It includes new solar capacity when it is most economic to the portfolio. 6) Finally, it is timely. New combustion turbines can come online quickly to replace coal generation that retires by the end of 2023, minimizing in-service lag and reducing exposure to the market.

The resource options selected in this plan provide a bridge to the future. For example, CT's allow time for battery storage technology to continue to become more competitive in price and further develop longer duration storage capabilities. Further, should there be a need for new baseload generation in the future to accommodate a large load addition or to replace Warrick 4 and Culley 3, one or both CT's could be converted to a CCGT, a highly efficient gas energy resource. Even with the large commitment in the near term to renewable resources, additional renewable resources can be added over time.

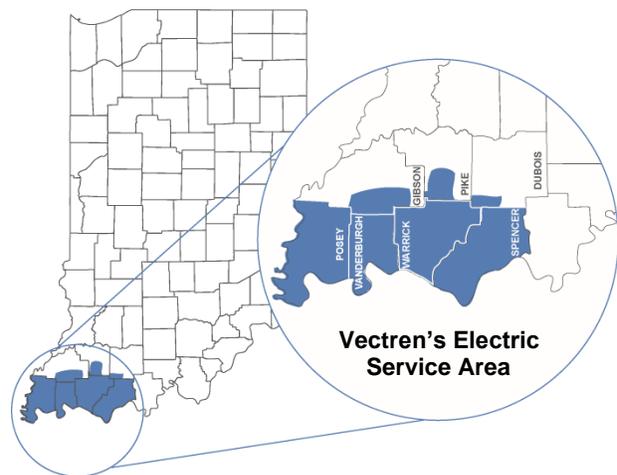
The preferred portfolio also provides several off-ramps (future transitional inflection points) should they be needed. 1) Vectren continues to speak with Alcoa about a possible extension of Warrick 4 (W4) joint operations through 2026. This option could provide additional time and shield Vectren customers from capacity purchases at a time where the market is expected to be tight, causing much higher projected prices than today. Additionally, time may be needed to allow Vectren to secure the level of renewable resources identified in the preferred portfolio and to allow for contingency for permitting and construction of new combustion turbines. 2) While Culley 3 is not scheduled to be retired within the timeframe of this analysis, including thermal dispatchable generation in this portfolio will allow Vectren flexibility to evaluate this option in future IRPs. 3) Vectren will work to secure attractive renewables projects from the recent All-Source RFP but will likely require a second RFP to fully secure 700-1,000 MWs of solar on multiple sites and 300 MWs of wind constructed over a span of several years. Issuing a second RFP provides two main benefits. It allows more local renewable options to select from, as some offered proposals are no longer available. Second, it provides additional time to better understand how MISO intends to move forward with market adjustments, such as

capacity accreditation and energy price formation. MISO’s wholesale market is adapting to fleet transition that is moving toward intermittent renewable resources.

What follows is a summary of Vectren’s process to identify this portfolio, focusing on Vectren’s operations, an explanation of the planning process and a summary of the preferred portfolio.

## II. Vectren Overview

Vectren provides energy delivery services to more than 146,000 electric customers located near Evansville in Southwestern Indiana. In 2018, approximately 44% of electric sales were made to large (primarily industrial) customers, 30% were made to residential customers and 26% were made to small commercial customers.



The table below shows Vectren generating units. Since the last IRP, Vectren has formally retired four, older small natural gas units<sup>1</sup> rather than investing significant capital dollars to ensure safety and reliability. Note that Vectren also offers customers energy efficiency programs to help lower customer energy usage and bills.

Unit	Installed Capacity ICAP (MW)	Primary Fuel	Year in Service	Unit Age	Coal Unit Environmental Controls <sup>2</sup>
A.B. Brown 1	245	Coal	1979	41	Yes
A.B. Brown 2	245	Coal	1986	34	Yes
F.B. Culley 2	90	Coal	1966	54	Yes
F.B. Culley 3	270	Coal	1973	47	Yes

<sup>1</sup> In 2018, Vectren retired BAGS 1 (50 MW). In 2019, Vectren retired Northeast 1&2 (20 MW) and BAGS2 (65 MW)

<sup>2</sup> All coal units are controlled for Sulfur Dioxide (SO<sub>2</sub>), Nitrogen Oxide (NO<sub>x</sub>), Particulate Matter (dust), and Mercury. All coal units are controlled for Sulfur Trioxide (SO<sub>3</sub>) and Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) except F.B. Culley 2.

Unit	Installed Capacity ICAP (MW)	Primary Fuel	Year in Service	Unit Age	Coal Unit Environmental Controls <sup>2</sup>
Warrick 4	150	Coal	1970	50	Yes
A.B. Brown 3	80	Gas	1991	29	
A.B. Brown 4	80	Gas	2002	18	
Blackfoot <sup>3</sup>	3	Landfill Gas	2009	11	
Fowler Ridge	50	Wind PPA	2010	10	
Benton County	30	Wind PPA	2007	13	
Oak Hill <sup>4</sup>	2	Solar	2018	<2	
Volkman Rd <sup>5</sup>	2	Solar	2018	<2	
Troy	50	Solar	2021		

### III. Integrated Resource Plan

Every three years Vectren submits an IRP to the IURC as required by IURC rules. The IRP describes the analysis process used to evaluate the best mix of generation and energy efficiency resources (resource portfolio) to meet customers' needs for reliable, low cost, environmentally sustainable power over the next 20 years. The IRP can be thought of as a compass setting the direction for future generation and energy efficiency options. Future analysis, filings and subsequent approvals from the IURC are needed to implement selection of new resources.

Vectren utilized direct feedback on analysis methodology, analysis inputs, and evaluation criteria from stakeholders, including but not limited to Vectren residential, commercial and industrial customers, regulators, elected officials, customer advocacy groups and environmental advocacy groups. Vectren continues to place an emphasis on reliability, customer cost, risk, resource diversity, and sustainability. The IRP process has become increasingly complex in nature as renewable resources have become more cost competitive, battery energy storage has become more viable, and existing coal resources are dispatched less and less.

<sup>3</sup> The Blackfoot landfill gas generators are connected at the distribution level.

<sup>4</sup> Oak Hill Solar is connected at the distribution level.

<sup>5</sup> Volkman Rd. Solar is connected at the distribution level.

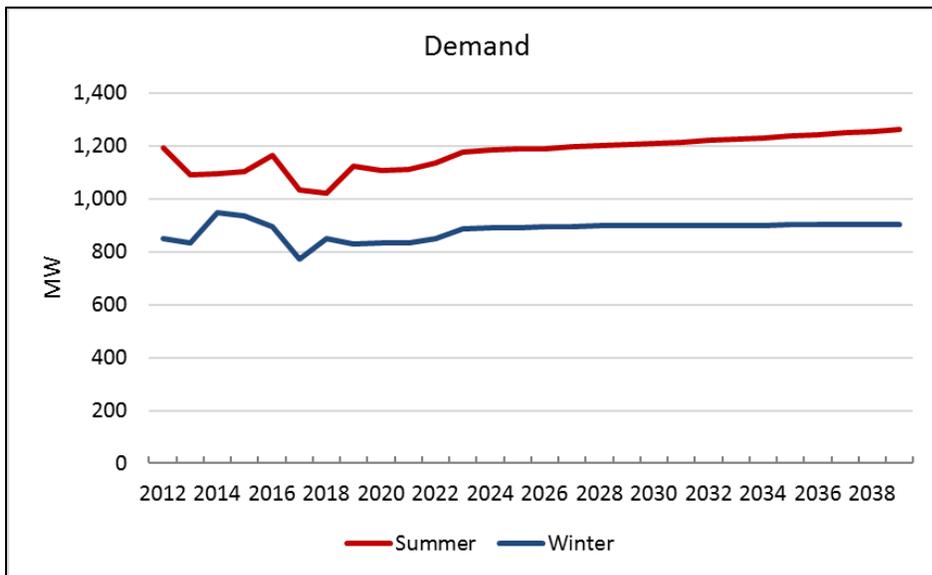
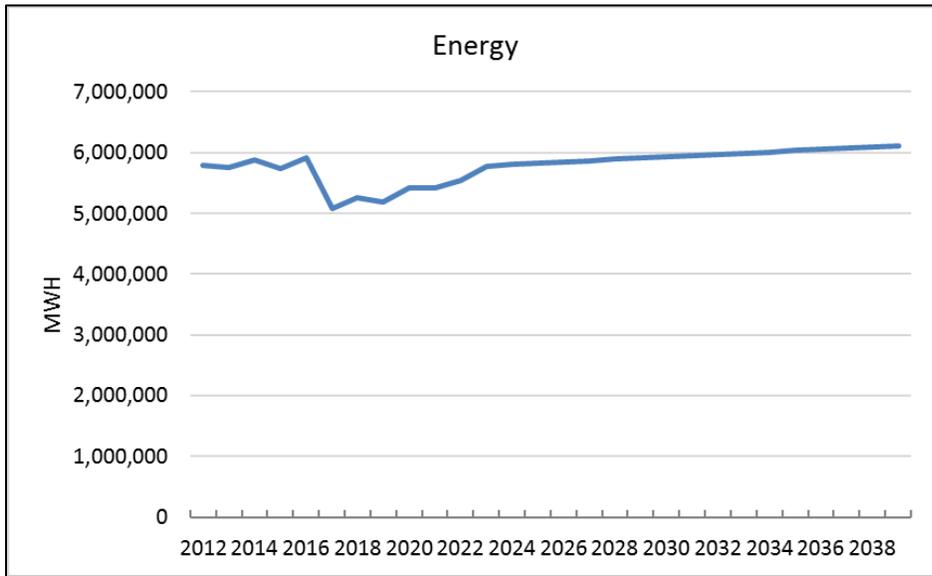
## **A. Customer Energy Needs**

The IRP begins by evaluating customers' need for electricity over the 20-year planning horizon. Vectren worked with Itron, Inc., a leader in the energy forecasting industry, to develop a forecast of customer energy and demand requirements. Demand is the amount of power being consumed by customers at a given point in time, while energy is the amount of power being consumed over time. Energy is typically measured in Megawatt hours (MWh) and demand is typically measured in Megawatts (MW). Both are important considerations in the IRP. While Vectren purchases some power from the market, Vectren is required to have enough generation and energy efficiency resources available to meet expected customers' annual peak demand plus additional reserve resources to meet MISO's Planning Reserve Margin Requirement (PRMR) for reliability. Reserve resources are necessary to minimize the chance of rolling black outs; moreover, as a MISO (Midcontinent Independent System Operator) member, Vectren must comply with MISO's evolving rules to maintain reliability.

Historically, IRPs have focused on meeting customer demand in the summer, which is typically when reserve margins are at a minimum. As the regional resource mix changes towards intermittent (variable) renewable generation, it is important to ensure that resources are available to meet this demand in all hours of the year, particularly in the times of greatest need (summer and winter). MISO functions as the regional transmission operator for 15 Midwestern and Southern states, including Indiana (also parts of Canada). In recognition of MISO's ongoing evaluation of how changes in the future resource mix impact seasonal reliability, Vectren ensured that its preferred portfolio would have adequate reserve margins for meeting both the winter and summer peak demand. Later in this document it is further explained how MISO is evaluating measures to help ensure year-round reliability.

Vectren utilizes sophisticated models to help determine energy needs for residential, commercial and large customers. These models include projections for the major drivers of energy consumption, including but not limited to, the economy, appliance efficiency

trends, population growth, price of electricity, weather, specific changes in existing large customer demand and customer adoption of solar and electric vehicles. Overall, customer energy and summer demand are expected to grow by 0.6% per year. Winter demand grows at a slightly slower pace of 0.5%.



## B. Resource Options

The next step in an IRP is identifying resource options to satisfy customers' anticipated need. Many resources were evaluated to meet customer energy needs over the next 20 years. Vectren considered both new and existing resource options. Burns and McDonnell, a well-respected engineering firm, conducted an All-Source RFP which generated 110



**Energy Efficiency/Demand Response**



**Natural Gas**



**Coal**



**Renewables, Wind & Solar**



**Battery Storage**

unique proposals to provide energy and capacity from a wide range of technologies, including: solar, solar + short duration battery storage, standalone short duration battery storage, demand response, wind, gas and coal. These project bids provided up-to-date market-based information to inform the analysis and provide actionable projects to pursue to meet customer needs in the near to midterm. Additionally, Vectren utilized other information sources for long term costs and operating characteristics for these resources and others over the entire 20-year period. Other options include continuation of existing coal units, conversion of coal units to natural gas, various natural gas resources, hydro, landfill gas, and long-duration batteries, as well as partnering with other load-serving entities. Every IRP is a snapshot in time producing a direction based on the best information known at the time. It is helpful to provide some background into significant issues that help shape the IRP analysis, including but not limited to: projected low stable gas prices, low cost and projected high penetration of intermittent renewable resources, future of coal resources, new technology and projected changes in the MISO market to adapt and help ensure reliability.

### i. Industry Transition

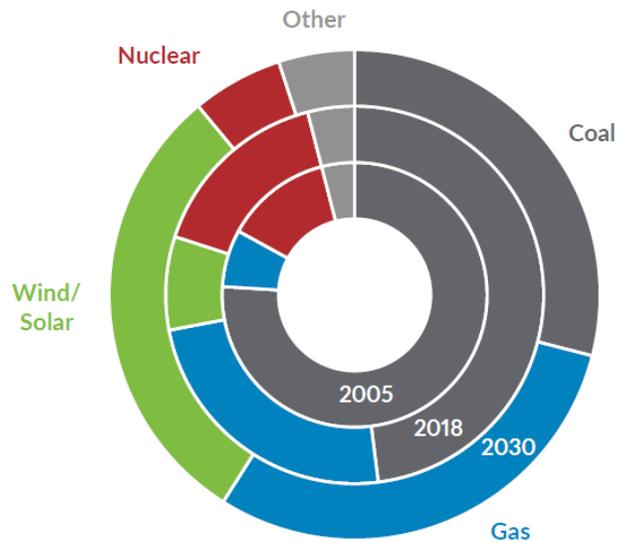
The cost of fuel used by generation facilities to produce electricity is also accounted for in evaluating the cost of various electric supply alternatives. Gas prices are near

record low levels and are projected to remain stable over the long term. Shale gas has revolutionized the industry, driving these low gas prices and has fueled a surge in low-cost gas generation around the country. Vectren’s IRP reflects the benefit low gas prices provide to the market, as gas units are on the margin and typically set market prices for energy.

Within the MISO footprint, energy from gas generation has increased from less than 10% of total electric generation, used primarily to meet the needs during peak demand conditions in 2005, to approximately 26% of total generation in 2018<sup>6</sup>. Meanwhile, the cost of renewable energy has declined dramatically over this time period due to improvements in technology and helped by government incentives in the forms of the Production Tax Credit for wind and the Investment Tax Credit (ITC) for solar, both of which are set to expire or ratchet down significantly over the next few years.

The move toward low cost renewable and gas energy has come at the expense of coal generation, which has been rapidly retiring for several reasons. Coal plants have not been able to compete on price with low cost renewable and gas energy. Operationally, the move toward intermittent renewable energy requires coal plants to more frequently cycle on and off. These plants were not

MISO Energy Mix Transition (GWH) from 2005 to 2018 to 2030  
(Based on Utility Announcements and State Integrated Resource Plans)\*



\*Chart reflects ratios of generation.

<sup>6</sup> MISO Forward Report, March 2019, page 10. <https://cdn.misoenergy.org/MISO%20FORWARD324749.pdf>

designed to operate in this manner. The result is increased maintenance costs and more frequent outages. Additionally, older, inefficient coal plants are being retired to avoid spending significant dollars on necessary upgrades to achieve compliance with Environmental Protection Agency (EPA) regulations. Finally, public and investor pressure, coupled with future cost risk associated with the objective of decreasing carbon emissions, has driven unit retirements. Based on these and other major factors, MISO expects the generation mix in 2030 to be much more balanced than in the past with roughly one third renewables, one third gas and one third coal. Some large nuclear plants remain but have also found it challenging to compete on cost.

**ii. Changing Market Rules to Help Ensure Reliability**

MISO recognizes these major changes in the way energy is being produced. Traditionally, baseload coal plants produced energy at a constant level, while peaking gas plants were available to come online as needed to meet peak demand. Gradual increases and decreases in energy demand throughout the day and seasonally were easily managed with these traditional resources. As described above, the energy landscape is continuing its rapid change with increased adoption of more intermittent renewable generation which is available when the sun is shining, or the wind is blowing. This creates much more variability by hour in energy production. Some periods will have over production (more energy produced than is needed at the time) and other periods will have low to no renewable energy production, requiring dispatchable resources to meet real time demand for power. MISO is in the process of studying how this transition will affect the electrical grid and what is needed to maintain reliable service, as renewables penetrations reach 30-50%. Possible ramifications include challenges to the ability to maintain acceptable voltage and thermal limits on the grid.

To deal with these challenges, MISO has been working through a series of studies and has put forth guidance for how they intend to evaluate resources moving forward. One significant development is the recognition that all hours matter. In the past, MISO

resource adequacy requirements focused on only the peak hour each year. Recent MISO emergencies in all seasons have demonstrated that the system can experience potential energy shortfalls in any hour due to changing resource conditions. As such, MISO is planning for new requirements to ensure resources are available for reliability in each of the 8,760 hours of the year. Each resource has different operating characteristics and different output levels, depending on the season. Vectren has accounted for these changes by validating that portfolios in this analysis provide sufficient resources to meet its MISO obligations<sup>7</sup> in the two heaviest demand periods (summer/winter). MISO has initiatives underway that include new testing requirements to ensure that Demand Response (DR) resources are available when needed. MISO's annual Market Road Map process has prioritized the development of mechanisms to more accurately account for resource availability. This includes an evaluation of how to best incentivize resources with the right kinds of critical attributes needed to keep the system operating reliably. Incentives are contemplated for resources that are available (dispatchable), flexible (ability to start quickly and meet changing load conditions when needed) and visible (have a better understanding of customer owned generation in addition to larger utility assets). MISO expects that traditional dispatchable coal and gas resources will continue to provide resilience to the grid.

### iii. **Battery Storage and Transmission Resources**

Increasingly, utilities are considering the opportunity to add battery storage to resource portfolios to help provide the availability, flexibility and visibility needed to move to more reliance on intermittent renewable resources. Lithium-ion batteries have seen significant cost declines over the last several years as the technology begins to mature and as the auto industry creates economies of scale by increasing production to meet the anticipated demand for electric vehicles. Large scale batteries for utility applications have begun to emerge around the country, particularly where incentives

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<sup>7</sup> Some portfolios have a heavy reliance on the market for both energy and capacity.

are available to lower the cost of this emerging technology or for special applications that improve the economics.

There are many applications for this resource, from shifting the use of renewable generation from time of generation to the time of need, to grid support for maintaining the reliability of the transmission system. Vectren has installed a 1 MW battery designed to capture energy from an adjacent solar project. This test project is providing information regarding the ability to store energy for use during the evening hours to meet customer energy demand. Along with the benefits provided by this technology, there are some limitations to keep in mind as utility scale battery storage is still evolving. Currently, commercially feasible batteries are short duration, typically four hours. There are some commercially available longer-duration batteries that show promise, but these are still very expensive. Additionally, safety standards are being developed and fire departments are being trained for the fire risk posed by L-ion batteries. Other chemistries are being developed to account for this issue but are not commercially imminent. Moreover, batteries today are a net energy draw on the system. They can produce about 90-95 percent of the energy that is stored in them. Part of this loss is due to the need to be well ventilated, cool and dry, which takes energy. Batteries are promising and have their place in current energy infrastructure, but they do not yet replace the need for other forms of dispatchable generation during extended periods without sun and wind. Vectren's All-Source RFP included bids for stand-alone batteries and batteries connected to solar resources.

### **C. Uncertainty/Risk**

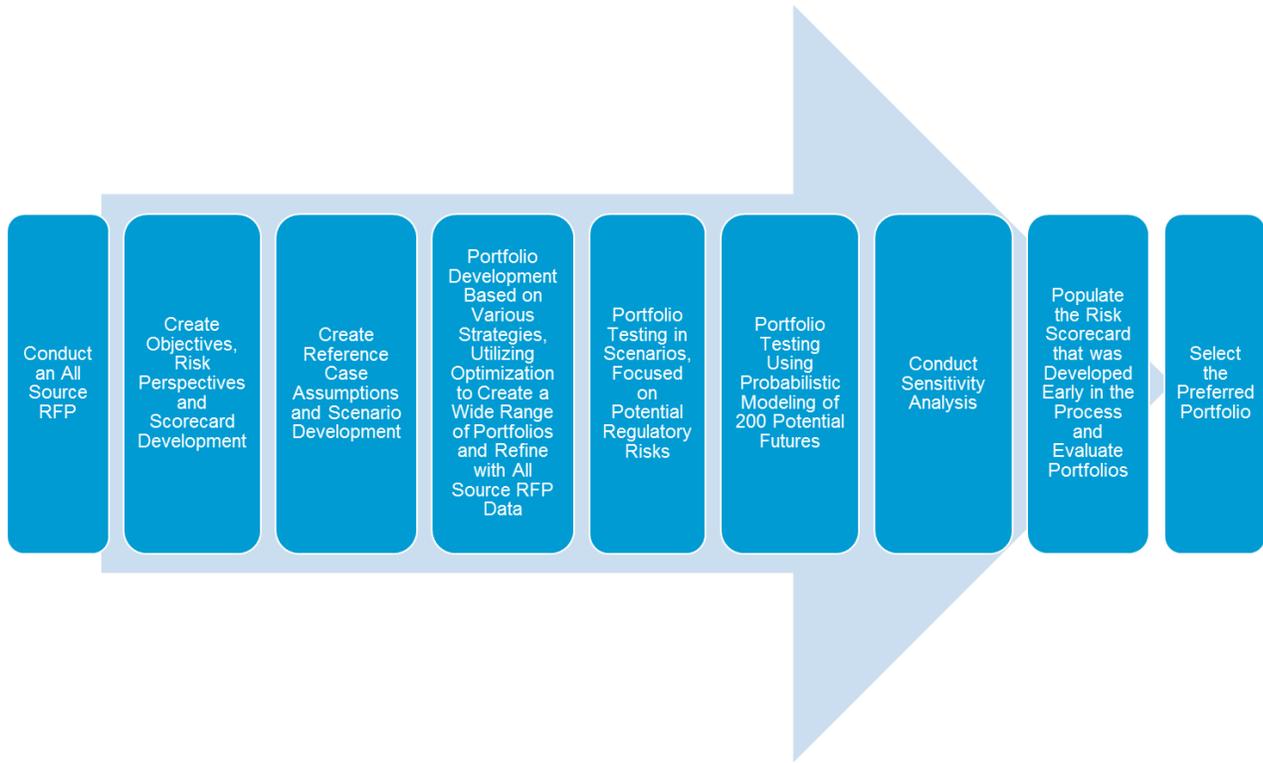
The future is far from certain. Uncertainty creates a risk that a generation portfolio that is reasonable under an anticipated future fails to perform as expected if the future turns out differently. Vectren's IRP analysis was developed to identify the best resource mix of generation and energy efficiency to serve customer energy needs over a wide range of possible future states. Vectren performed two sets of risk analyses, one exposing a defined set of portfolios to a limited number of scenarios and another that exposed the

same portfolios to 200 scenarios (stochastic or probabilistic risk assessment). To help better understand the wide range of possibilities for wholesale market dynamics, regulations, technological breakthroughs and shifts in the economy, complex models were utilized with varying assumptions for major inputs (commodity price forecasts, energy/demand forecasts, market power prices, etc.) to develop and test portfolios with diverse resource mixes.

#### **IV. Analysis**

Vectren's analysis included a step-by-step process to identify the preferred portfolio. The graphic below summarizes the major steps which included the following:

1. Conduct an All-Source RFP to better understand resource cost and availability.
2. Work with stakeholders to develop a scorecard as a tool in the full risk analysis to help highlight several tradeoffs among various portfolios of resources.
3. Work with stakeholders to develop a wide range of future states, called scenarios, to be used for testing of portfolios (mixes of various resource combinations to serve customer power and energy need).
4. Work with stakeholders to develop a wide range of portfolios for testing and evaluation within scenarios, sensitivity analysis and probabilistic analysis. Each of these analyses involves complex modeling.
5. Utilize the quantitative scorecard measures and judgement to select the preferred portfolio (the best mix of resources to reliably and affordably serve customer energy needs while minimizing known risks and maintaining flexibility).



## V. Stakeholder Process

Vectren reevaluated how to conduct the stakeholder process based on comments in the Director’s report, stakeholder feedback and the Commission order in Cause number 45052. Careful consideration was taken to ensure that the time spent was mutually beneficial.

Each of the first three stakeholder meetings began with stakeholder feedback. Vectren would review requests since the last stakeholder meeting and provide feedback. Suggestions were taken and in instances where suggestions were not acted upon, Vectren made a point to further discuss and explain why not. Per stakeholder feedback, notes for each meeting were included in question and answer format, summarizing the conversations. Additionally, feedback was received, and questions were answered via e-mail ([irp@centerpointenergy.com](mailto:irp@centerpointenergy.com)) and with phone calls/meetings in between each session per request.

Three of four public stakeholder meetings were held at Vectren in Evansville, IN. The final stakeholder meeting on June 15, 2020 was held via webinar due to the COVID-19 situation. Dates and topics covered are listed below:

August 15, 2019	October 10, 2019	December 13, 2019	June 15, 2020*
<ul style="list-style-type: none"> <li>• 2019/2020 IRP Process</li> <li>• Objectives and Measures</li> <li>• All-Source RFP</li> <li>• Environmental Update</li> <li>• Draft Reference Case Market Inputs &amp; Scenarios</li> </ul>	<ul style="list-style-type: none"> <li>• RFP Update</li> <li>• Draft Resource Costs</li> <li>• Sales and Demand Forecast</li> <li>• DSM MPS/ Modeling Inputs</li> <li>• Scenario Modeling Inputs</li> <li>• Portfolio Development</li> </ul>	<ul style="list-style-type: none"> <li>• Draft Portfolios</li> <li>• Draft Reference Case Modeling Results</li> <li>• All-Source RFP Results and Final Modeling Inputs</li> <li>• Scenario Testing and Probabilistic Modeling Approach and Assumptions</li> </ul>	<ul style="list-style-type: none"> <li>• Final Reference Case and Scenario Modeling Results</li> <li>• Probabilistic Modeling Results</li> <li>• Risk Analysis Results</li> <li>• Preview the Preferred Portfolio</li> </ul>

- Moved final stakeholder meeting date per stakeholder request and the COVID-19 situation

Based on this stakeholder engagement, Vectren made fundamental changes to the analysis in real time to address concerns and strengthen the plan. IRP inputs and several of the evaluation measures used to help determine the preferred portfolio were updated through this process. Vectren utilized stakeholder information to create boundary conditions that were wide enough to produce plausible future conditions that would favor opposing resource portfolios (i.e. Indiana Coal Council (ICC) request to continue coal through 2029 or 2039 and environmental stakeholders' request to utilize all renewable resources by 2030). For example, the low regulatory future includes declining coal prices and higher gas prices, which was a request from the ICC. The High Regulatory scenario, which was heavily influenced by environmental stakeholders, is the other plausible future

bookend with a natural gas fracking ban (sustained high price), a social cost of carbon fee starting at \$50 per ton in 2022 and lower renewables cost trajectory than what is expected. Additionally, an evaluation measure was adjusted based on direct stakeholder input. Vectren included the life cycle of carbon emissions for all resources in response to the ICC and environmental stakeholders. The table below shows key stakeholder requests made during the process and Vectren’s response.

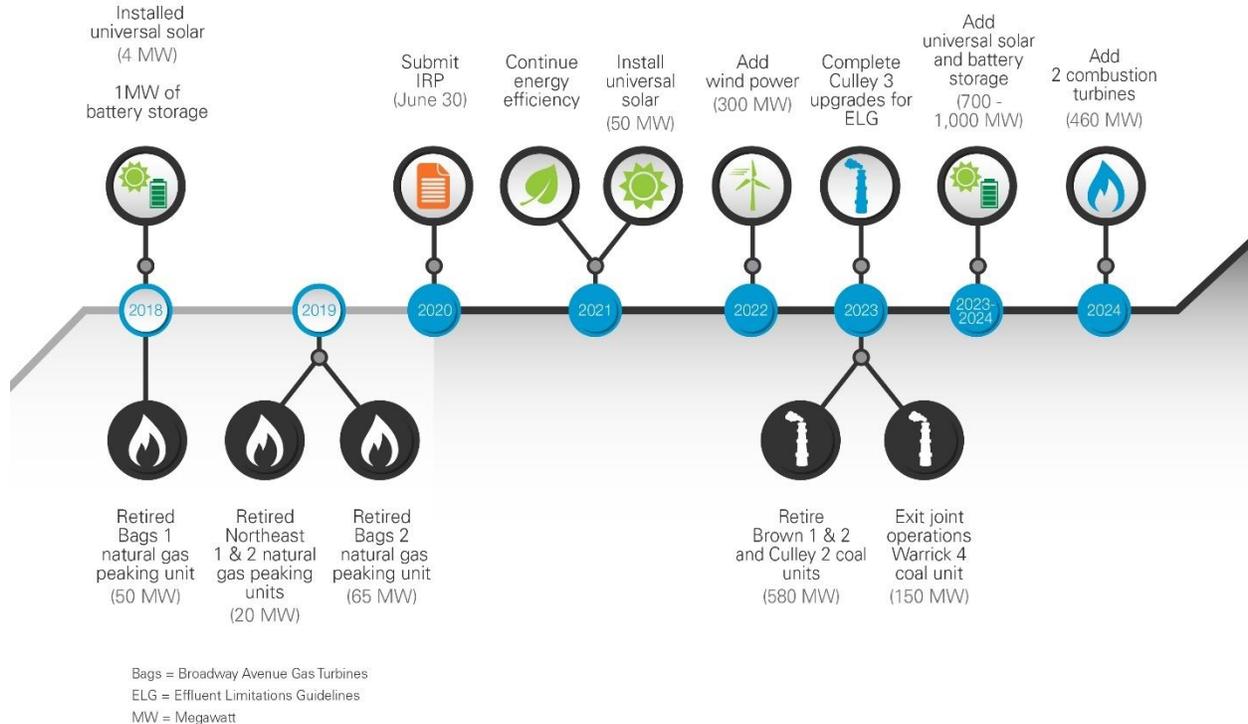
Request	Response
Update the High Regulatory scenario to include a carbon fee and dividend	Included a fee and dividend construct which assumed a balanced impact on the load (the economic drag from a carbon fee is neutralized by the economic stimulus of a dividend)
Lower renewables costs in the High Regulatory and 80% CO <sub>2</sub> Reduction scenarios	Updated scenario to include lower costs for renewables and storage than the Reference scenario
Consider life cycle emissions using CO <sub>2</sub> equivalent	Included a quantitative measure on the risk scorecard based on National Renewable Energy Lab (NREL) Life Cycle Greenhouse Gas Emissions (CO <sub>2</sub> e) from Electricity Generation by Resource
Include a measure within the risk score card that considers the risk that assets become uneconomic	Included an uneconomic asset risk as a consideration in the overall evaluation. Not included in the scorecard.
Include a scenario with a carbon dividend modeled after HB 763 with a CO <sub>2</sub> price that was approximately \$200 by the end of the forecast	Utilized a scenario with these prices to create an additional portfolio. Ultimately, this portfolio was not selected for the risk analysis, as the amount of generation built

Request	Response
	within modeling vastly exceeded Vectren's need and resulted in large energy sales
Reconsider the use of a seasonal construct for MISO resource accreditation	Reviewed calculation for solar accreditation in winter and utilized an alternate methodology, increasing accreditation in the winter
Include a CO <sub>2</sub> price in the reference case	Included mid-range CO <sub>2</sub> prices 8 years into the forecast. The Low Regulatory scenario did not include a CO <sub>2</sub> price, thus becoming a boundary condition

Meeting materials of each meeting can be found on [www.vectren.com/irp](http://www.vectren.com/irp) and in Technical Appendix Attachment 3.1 Stakeholder Materials.

## VI. The Preferred Portfolio

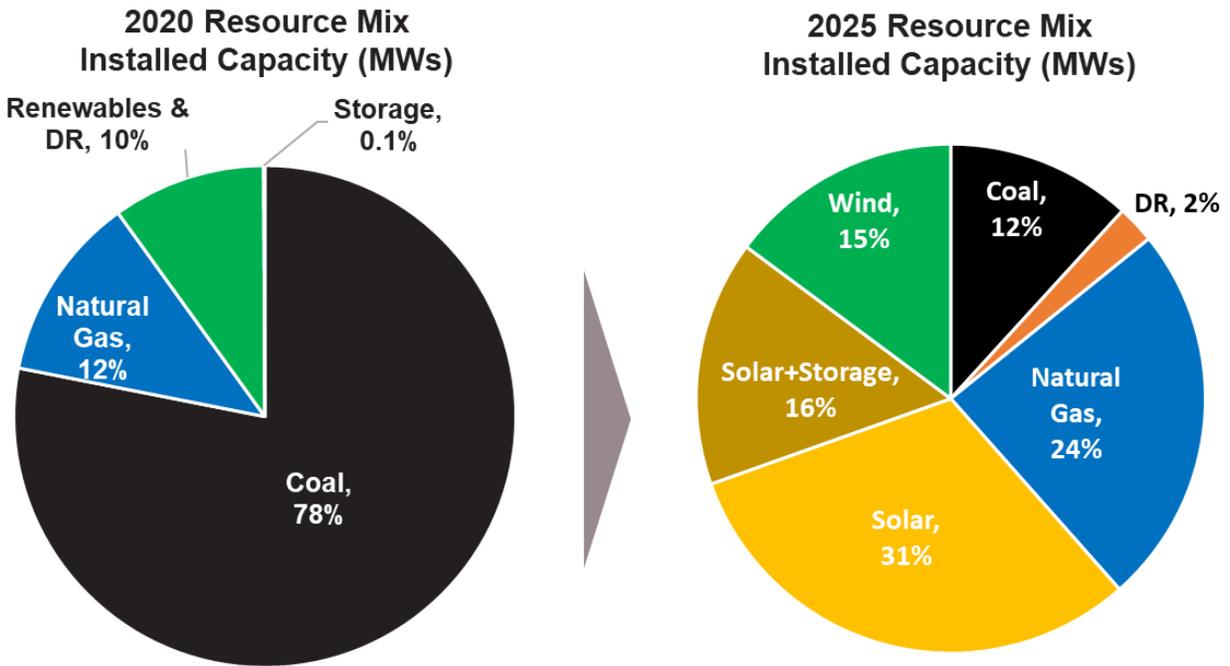
The Preferred Portfolio recommendation is to retire or exit 730 MWs of coal generation and replace with 700-1,000 MWs of solar generation (some connected to battery storage), add 300 MWs of wind backed by dispatchable generation that consists of 2 new Combustion Turbine (CT) gas units and maintaining Culley 3 (coal unit).



This preferred portfolio:

- Allows customers to enjoy the benefits of low-cost renewable energy, while ensuring continued reliable service as Vectren moves toward higher levels of intermittent renewable energy in the future.
- Saves customers over \$320 million over the next 20 years when compared to continued operation of Vectren’s coal fleet. The preferred portfolio is a low-cost portfolio in the near, mid and long term.
- Reduces lifecycle greenhouse gas emissions, which includes methane, by nearly 60% over the next 20 years. Direct carbon emissions are reduced 75% from 2005 levels by 2035.

- Includes a diverse mix of resources (renewables, gas and coal), mitigates the impacts of extended periods of limited renewable generation and protects against overreliance on the market for energy and capacity.
- Maintains future flexibility with several off ramps to accommodate a rapidly evolving industry, includes a multi-year build out of resources on several sites and maintains the option to extend the contract with Alcoa for Warrick 4 for a few years and maintains the option to consider the replacement of Culley 3 in the future when appropriate based on continual evaluation of changing conditions. These options will be reevaluated in future IRPs.
- Provides the flexibility to adapt to future environmental regulations or upward shifts in fuel prices relative to Reference Case assumptions. The preferred portfolio performed consistently well across a wide range of potential future environmental regulations, including CO<sub>2</sub>, methane and fracking.
- Adds some battery energy storage in the near term, paired with solar resources to provide clean renewable energy when solar is not available. Provides time for technological advances that will allow for high penetration of renewables across the system, further cost declines and further Vectren operational experience to meet Vectren's customers' energy needs.
- Continues Vectren's energy efficiency programs with near term energy savings of 1.25% of eligible sales and further long-term energy savings opportunities identified over the next 20 years. Vectren is committed to Energy Efficiency to help customers save money on their energy bills and will continue to evaluate this option in future IRPs.



## VII. Next Steps

The preferred portfolio calls for Vectren to make changes to its generation fleet. Some of these changes require action in the near term. First, Vectren will finalize the selection process to secure renewable projects from the All-Source RFP and seek approval from the IURC for attractive projects. Second, the IRP calls for continuation of energy efficiency. Vectren filed a 2021-2023 plan with the IURC in June of 2020, consistent with the IRP. Third, Vectren intends to pursue two natural gas combustion turbines to provide dispatchable support to the large renewables based preferred portfolio. These filings will be consistent with the preferred portfolio. However, the assumptions included in any IRP can change over time, causing possible changes to resource planning. Changes in commodities, regulations, political policies, customer need and other assumptions could warrant deviations from the preferred plan.

Vectren's plan must be flexible; as several items are not certain at this time.

- The timing of exiting joint operations of the Warrick 4 coal plant could change. The plant is jointly owned with Alcoa. Without incremental investment, the plant does

not comply with the ELG and other water discharge control requirements. Vectren therefore continues to talk to Alcoa about its plans.

- The availability of attractive renewable projects is currently being evaluated. Negotiations for resources must take place to finalize availability and cost of projects. The Coronavirus has put pressure on supply chains and put in jeopardy the ability of full utilization of the Production Tax Credit and Investment Tax Credit for some projects. Competition for these projects is steep, with multiple, on-going RFP processes in the state of Indiana.
- Finally, MISO continues to evaluate the accreditation of resources. Vectren will continue to follow developments to determine the right amount of renewable resources to pursue in the near term.