

November 10, 2021

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Via E-mail to bheline@urc.IN.gov and URCComments@urc.in.gov

Ms. Beth E. Heline, General Counsel
Indiana Utility Regulatory Commission
101 W. Washington St. Ste. 1500 East
Indianapolis, IN 46204-3407

Re: Additional Comments regarding Securitization Strawman Rule, RM #12-02

Dear Ms. Heline:

Thank you for the opportunity to again provide comments on the Commission's "strawman" securitization rule. We appreciate the consideration given to our previous comments, and have just a few additional comments at this time. I am submitting the collective comments of the following utilities: Duke Energy Indiana, Indiana Michigan Power Co., Indianapolis Power & Light Co. (AES), Northern Indiana Public Service Co., and Southern Indiana Gas & Electric Co. (CenterPoint).

Section 1

To improve consistency with the language of the statute (IC ch. 8-1-40.5), we suggest use of the term "qualified costs" instead of "retired electric utility generation assets". The past tense of "retired" is a concern given that assets may be retired post-securitization.

Section 5

In subsection (c)(10), we recommend using the phrase "including discussion of consistency with Ind. Code § 8-1-40.5-10(d)(4)(A)" instead of the phrase "with justification of any plan investment that is not identified as a clean energy resource." This would be more consistent with the language of IC ch. 8-1-40.5, which directs the Commission to encourage investments in clean energy resources, but does not require such.

In subsection (c)(11), we recommend deleting the word "all" before "assumptions, to avoid inadvertent technical violations.

In subsection (c)(7), there is a typo ("utilized"). And in subsection (c)(12), "in" should be "if".

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Thank you again for seeking and considering our input.

Sincerely,

ICE MILLER LLP

A handwritten signature in black ink that reads "Kay E. Pashos". The signature is written in a cursive style with a light blue shadow effect behind the text.

Kay E. Pashos

:rkah