

Indiana Municipal Power Agency

Comments on Draft Statewide Analysis of Future Resource Requirements for Electricity dated June 20, 2018

The Indiana Municipal Power Agency appreciates the opportunity to comment on the IURC's draft Statewide Analysis of Future Requirements for Electricity document issued June 20, 2018. IMPA believes that the final draft of the resource analysis should fully reflect the goals dictated by SEA 412 (2015) and the final GAO of the Indiana Utility Regulatory Commission. While IMPA believes there are errors in the document as drafted, our comments are limited specifically to those areas of the report that are related to IMPA's 2017 IRP or its portfolio of resources.

Section III.A.1.d. – Page 11

- The language in this paragraph uses quotes from two different sections of IMPA's 2017 IRP. The first portion is from the executive summary and the second portion is from the forecast section of the IRP. The paragraph states the long term annual growth rate twice. While this seems a bit repetitive as written, more importantly, the two figures do not match. The actual growth rate should be the .6% figure referenced in the detailed forecast section of the IRP report and second portion of the paragraph. IMPA apologizes for this typographical error in the executive summary of its IRP.

Section III.C.3 – Page 46

- The three non-IOU IRP filing entities are left out of the wind PPA totals; however, IMPA has an out of state wind PPA for 50 MW.

Section III.C.3 – Page 48

- The table in the middle of the page is not labeled, refers to kW instead of MW and excludes 5 MW of IMPA solar facilities greater than the 1 MW threshold. (See additional comments on Appendix 4)

Appendix 2 - Coal Fleet Retirements – Page 64

- Whitewater Valley Station (WWVS) #2 did not retire in 2015 and remains in service along with WWVS #1.

Appendix 2 - Coal Fleet Currently in Operation – Page 65

- Table excludes WWVS #1 (30 MW - 1955) and #2 (60 MW – 1973).
- IMPA’s ownership share of Prairie State #1 and #2 is approximately 103 MW per unit.
- There is another Indiana participant in the Prairie State project – WVPA.

Appendix 2 – Coal Units in Operation with Status notes based on IRPs. – Page 66

- Table excludes WWVS #1 (30 MW - 1955) and #2 (60 MW – 1973). IMPA’s 2017 IRP showed the WWVS station retiring in 2025.
- IMPA’s ownership share of Prairie State #1 and #2 is approximately 103 MW per unit.
- Gibson #5 is not retiring in 2019 nor did Duke’s 2015 IRP state this (see page 23 of draft report).

Appendix 3 – Wind PPAs by Indiana IOUs – Page 67

- IMPA believes this table should also include the wind PPAs of the non-investor owned utilities (IMPA, WVPA and Hoosier).

Appendix 4 – Solar PV generation greater than 1 MW (ac) – Page 68

- This table is missing one IMPA project over 1 MW and some of the capacities listed in the report are incorrect.
- The correct projects and capacities are shown below, as presented in IMPA’s 2017 IRP.

Project	Draft Report	IMPA 2017 IRP
Anderson 1	Not listed	5.0
Anderson 2	8.2	8.1
Washington	3.0	3.9
Crawfordsville	3.0	3.0
Peru	3.0	3.0
Greenfield	3.0	2.8
Pendleton	2.0	2.0
Huntingburg	1.8	2.1
Frankton	1.0	1.0
Tell City	1.0	1.1
Rensselaer 1	1.0	1.0
Richmond 1	1.0	1.0
Total	28.0	34.0

- The table at bottom of the page references kW instead of MW.

Appendix 5 - Renewable Resource Summary with Details – Page 70

- It appears as though this table includes solar projects under 1 MW, planned projects and customer generation projects. (220.1 MW in App. 5 vs 190.6 MW in App. 4)
- If this is the case, then the IMPA solar figures should include the total amount of its existing projects, including those under 1 MW (36.7 MW), the new projects currently under development/construction and scheduled to be online within the next 12 months (16.9 MW) and the customer-owned solar generation that IMPA is aware of on its system (.7 MW).
- This would bring IMPA's total on this table to 54.3 MW of solar.

Appendix 7 – Map of Generating Units – Page 70

- Whitewater Valley is not retired – capacity should be 90 MW.
- IMPA's Prairie State #1 and #2 share should be 206 MW and perhaps include a state reference like the other out of state plants listed.
- Gibson and Prairie State are not shown to be co-owned by Indiana utilities as are the other co-owned plants.