

June 9, 2015

DeAnna Poon, Assistant General Counsel
Indiana Utility Regulatory Commission

Via e-mail (dpoon@urc.in.gov)

Re: IURC RM #15-02

Dear Ms. Poon:

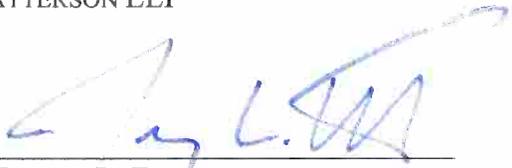
Attached please find comments to the Indiana Utility Regulatory Commission's ("Commission") procedural rules as discussed at the May 26, 2015 Rule Development Workshop no. 1 with respect to IURC RM #15-02.

On behalf of Wabash Valley Power Association, Inc. ("Wabash Valley"), we hope that the feedback provided will be helpful to the Commission.

Feel free to contact me with any questions.

Sincerely,

PARR RICHEY OBREMSKEY FRANDSEN
& PATTERSON LLP

By: 
Jeremy L. Fetty

jmp

cc: Wabash Valley Power Association, Inc. (via e-mail)

Wabash Valley Power Association, Inc.'s ("Wabash Valley") Comments to Procedural Rules for IURC RM #15-02

Wabash Valley supports procedural rule updates that encourage and/or require electronic filing and service and believes it is important to develop electronic processes that are flexible and user friendly. Wabash Valley requests that the Indiana Utility Regulatory Commission ("Commission") consider the following:

- Use the Federal Energy Regulatory Commission ("FERC") eFiling system and eLibrary system as a model and resource. Wabash Valley has used these very user-friendly systems regularly and would strongly encourage, to the extent possible, the Commission model its electronic procedures and processes after the FERC systems.
- Allow for electronic signatures and conformed signatures for filed documents and documents offered into evidence, including use of PDF signatures which are not originals. Use of a PDF signature should not be an issue under the "best evidence" rule as duplicates are admissible to the same extent an original unless genuine issues are raised regarding authenticity making it unfair to admit. Indiana Rules of Evidence 1003. If there is a question regarding authenticity, a party can cross-examine a witness to prove the content.
- Allow all filings (petitions and pleadings) to be submitted electronically. With the use of an electronic system, Wabash Valley suggests that the deadline for all electronic filings and service be midnight.
- Electronic system should generate cause numbers, thus eliminating requirement to call ahead of time to obtain a cause number.
- Electronic service should be mandatory. In the alternative, electronic service should be the default method unless postal service is requested.
- Ability to request receipt of electronic notices of filings, orders and docket entries by subscribing to, or intervening in, a proceeding.
- Electronic filing system should permit the filing of Excel spreadsheets.
- Service lists should be maintained and accessible on the electronic system.
- Ability to file confidential documents through a confidential tab on the electronic filing system.