

Indiana Michigan Power

P.O. Box 60

Fort Wayne, IN 46801

IndianaMichiganPower.com

Received: August 6, 2014
IURC 30-Day Filing No.: 3262
Indiana Utility Regulatory Commission



A unit of American Electric Power

Secretary of the Commission
Indiana Utility Regulatory Commission
PNC Center
101 West Washington Street, Suite 1500 East
Indianapolis, Indiana 46204

August 6, 2014

Dear Secretary:

Pursuant to 170 IAC 1-6, I&M submits this thirty-day filing requesting amendments to I&M's Rider R.P.R. (Residential Peak Reduction Rider). In support of this thirty-day filing, I&M represents that on April 27, 2011 in Cause No. 43959, the Commission approved I&M's Rider R.P.R. Included in the approval of Rider R.P.R. was Rider language stating, "For emergency purposes, load management events shall not exceed 10 events per PJM planning year (June – May) and not last longer than six (6) hours duration. Emergencies shall be determined by PJM as defined in PJM Manual 13 – Emergency Operations. Emergency load management events can only occur between Noon and 8 pm on weekdays during May through September." Additionally, I&M represents that on May 9, 2014, the Federal Energy Regulatory Commission (FERC) approved in Docket ER14-822, modifications proposed by PJM Interconnection LLC to its Open Access Transmission Tariff (OATT), some provisions of which went into effect on June 1, 2014. I&M requests to amend Rider R.P.R. to reflect the new provision of OATT that became effective June 1, 2014 pertaining to Pre-Emergency curtailments.

Approved in Docket ER14-822 is a Pre-Emergency curtailment option that provides PJM with additional flexibility while the limit of total curtailment requests per year, Emergency and Pre-Emergency, has not increased. The PJM information regarding the new Pre-Emergency curtailment is included in Attachment A.

In support of this 30-Day filing, I&M is submitting the following information:

1. Indiana Michigan Power Company's Rider R.P.R. (Residential Peak Reduction Rider), Tariff Sheets SECOND REVISED SHEET NO. 8.
2. Supporting PJM documentation, Attachment A, and
3. Verified Statement of Publication.

Upon completion of your review, please return to us one set of the stamped approved tariff sheets.

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If you have any questions regarding I&M's filing please contact me at (260) 408-3503 or wwhix@aep.com.

Sincerely,



William W. Hix

Principal Regulatory Consultant

Enclosures

cc: Andrew Williamson-I&M
Brad Borum-IURC
David Stippler-OUCC

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**RIDER R.P.R.
(Residential Peak Reduction Rider)**

T

Availability of Service.

Available on a voluntary basis for customers receiving residential electric service.

For non-owner occupied multi-family dwellings, the Company may require permission from the owner to install load control equipment and, if necessary, auxiliary communicating devices. Customers will not be eligible for this rider if the owner does not allow installation of such equipment.

Program Description.

To participate, customers must allow the Company, or its authorized agents, to install load control equipment and, if necessary, auxiliary communicating devices to control the customer's central electric cooling unit(s). All such devices shall be installed at a time that is consistent with the orderly and efficient deployment of this program.

The Company will utilize the installed control devices to reduce customer's energy use during load management events. The Company plans to control devices for up to 150 hours per year with no single event lasting more than six (6) consecutive hours. The Company plans to initially utilize a 50% cycling strategy of the central electric cooling unit(s) during summer months. However, other cycling strategies may be employed and evaluated to determine the strategy that optimizes load reduction without significantly affecting customer comfort.

Company planned load management events shall not exceed six (6) hours per day. Such non-emergency load management events shall not exceed 15 events per year and shall occur only during the months of May through September between Noon and 8 pm.

The customer may opt out of a Company planned load management event by contacting the Program Administrator by telephone.

For emergency and pre-emergency purposes, load management events shall not exceed 10 events per PJM planning year (June – May) and not last longer than six (6) hours duration. Emergencies and pre-emergencies shall be determined by PJM as defined in PJM Manual 13 – Emergency Operations. Emergency and pre-emergency load management events can only occur between Noon and 8 pm on weekdays during June through September.

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Rate Credit.

Customers shall receive an \$8.00 monthly billing credit for each central electric cooling unit controlled during the billing months of May to September.

Such credit shall not reduce the customer's bill below the minimum charge as specified in the tariff under which the customer takes service.

(Cont'd on Sheet No. 8.1)

**ISSUED BY
PAUL CHODAK III
PRESIDENT
FORT WAYNE, INDIANA**

**EFFECTIVE FOR ELECTRIC SERVICE RENDERED
ON AND AFTER _____**

**ISSUED UNDER AUTHORITY OF THE
INDIANA UTILITY REGULATORY COMMISSION
CONFERENCE DATED _____, 2014
30-DAY FILING NO. _____**

Received: August 6, 2014
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RIDER R.P.R.
(Residential Peak Reduction Rider)

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PAUL CHODAK III
PRESIDENT
FORT WAYNE, INDIANA

EFFECTIVE FOR ELECTRIC SERVICE RENDERED
ON AND AFTER _____

ISSUED UNDER AUTHORITY OF THE
INDIANA UTILITY REGULATORY COMMISSION
CONFERENCE DATED _____, 2014
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Summary of Proposed Changes (2014-2015 DY)

- **Registration**
 - All registrations classified as Pre-Emergency or Emergency
 - Emergency = On-Site generation that may only operate under PJM emergency conditions
 - New 30 minute lead time (short), rename 60 minute lead time to (medium) and 120 lead time (long)
 - Emergency energy offer price cap by lead time:
 - 30 minutes, Price \leq \$1,000 MWh plus Primary Reserve factor minus \$1
 - 60 minutes, Price \leq \$1,000 MWh plus (Primary Reserve factor/2)
 - 120 minutes, Price \leq \$1,100 MWh
- **Event**
 - Pre-Emergency vs Emergency (both Pre-Emergency and Emergency DR must respond to event)
 - Min event duration reduced from 2 hours to 1 hour
- **M&V**
 - PJM will measure compliance for partial dispatch clock hours based on prorated commitment based on number of minutes dispatched in hour where PJM dispatched for at least 30 minute of clock hour.
 - Ability to use 1 minute meter data instead of prorate process
- **Penalties**
 - No changes
- **CSP Load Reduction Reporting (used for PJM dispatch and price formation)**
 - CSP provide aggregation expected real time load reductions by:
 - Zone (same as today), Lead time (new 30 minute classification), Event type (Emergency vs Pre-Emergency)

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

Received: August 6, 2014
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Indiana Utility Regulatory Commission

VERIFIED STATEMENT OF PUBLICATION

William W. Hix, being duly sworn upon oath, deposes and says that:

1. I am a Principal Regulatory Consultant for Indiana Michigan Power Company (I&M).
2. Pursuant to 170 IAC 1-6-5(a), I affirm that affected customers have been notified of I&M's thirty-day filing of an updated Rider R.P.R. (Residential Peak Reduction Rider) to reflect the addition of a Pre-emergency curtailment option to PJM Interconnection LLC's Open Access Transmission Tariff (OATT) approved by FERC in Docket ER14-822 which went into effect on June 1, 2014.
3. Notification of the thirty-day filing updating Rider R.P.R. (Residential Peak Reduction Rider) was made by publication of a Legal Notice in a newspaper of general circulation that has a circulation encompassing the highest number of I&M's customers, and posting the notice on I&M's website.
4. A true and correct copy of I&M's Legal Notice is attached hereto as Exhibit "A".

Date: August 6, 2014

William W. Hix
Principal Regulatory Consultant
Indiana Michigan Power Company

STATE OF INDIANA)
) ss:
COUNTY OF ALLEN)

Subscribed and sworn to before me, a Notary Public, in and for said County and State this 6th day of August 2014.

Regina M. Sistevaris, Notary Public

I am a resident of Allen County, Indiana.
My commission expires: March 6, 2015

The Journal Gazette

Received: August 6, 2014
IURC 30-Day Filing No.: 3262
Indiana Utility Regulatory Commission
Allen County, Indiana

Account # 1065923 - 1138726
Indiana Michigan Power Co

ATTACH COPY OF ADVERTISEMENT HERE

PUBLISHER'S CLAIM

LINE COUNT

Display Master (Must not exceed two actual lines, neither of which shall total more than four solid lines of the type in which the body of the advertisement is set) -- number of equivalent lines	_____
Head -- number of lines	_____
Body -- number of lines	_____
Tail -- number of lines	_____
Total number of lines in notice	67

COMPUTATION OF CHARGES

<u>67</u> lines, <u>1</u> column(s) wide equals	
<u>67</u> equivalent lines at \$ <u>2.610</u> cents per line	\$ 174.87
Additional charges for notices containing rule or tabular work (50 per cent of above amount)	-
Charge for extra proofs of publication (\$1.00 for each proof in excess of two)	-
TOTAL AMOUNT OF CLAIM	\$ <u>174.87</u>

DATA FOR COMPUTING COST

Width of single column in picas 9.8 Size of type 7point.
Number of Insertions 1

Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid.

I also certify that the printed matter attached hereto is a true copy, of the same column width and type size, which was duly published in said paper 1 times.

The dates of publication being as follows:

<u>8/1/2014</u>	-	-	-
-	-	-	-
-	-	-	-

Additionally, Newspaper has a Web site and this public notice was posted on the same day as it was published in The Journal Gazette.

T. Brown-Smith
Legal Clerk

Date: August 1, 2014

Received: August 6, 2014
IURC 30-Day Filing No.: 3262
Indiana Utility Regulatory Commission

**LEGAL NOTICE
STATE OF INDIANA
INDIANA UTILITY REGULATORY
COMMISSION**

Indiana Michigan Power Company (I&M), an Indiana corporation, gives notice that on or before August 6, 2014, it will submit for approval under the Indiana Utility Regulatory Commission's thirty-day filing process, an updated Rider R.P.R. (Residential Peak Reduction Rider) to reflect the changes to the PJM Interconnection LLC (PJM) Open Access Transmission Tariff (OATT) approved by FERC on May 9, 2014 in Docket ER14-822 that went into effect June 1, 2014. The operational change that affects the demand response rider customers during the PJM year 2014/2015 pertains to PJM's ability to issue, in addition to Emergency curtailment requests, Pre-emergency curtailment requests. The addition of the Pre-emergency curtailment provides PJM with additional flexibility without increasing the limit of curtailment requests per year allowed, which includes Emergency and Pre-emergency curtailments. I&M will submit proposed tariff modifications that add the Pre-emergency curtailment as a possible curtailment option. While Rider R.P.R. customers may be affected by the addition of the Pre-emergency curtailment requests, the maximum number and maximum duration of curtailment events has not changed. A decision on the proposed modification to Rider R.P.R. is expected from the Indiana Utility Regulatory Commission on or before September 10, 2014.

Please direct inquiries to:

Indiana Michigan Power Company
Attn: Director of Regulatory Services
P.O. Box 60
Fort Wayne, IN 46801

Objections to this filing can be made to the following:

Indiana Utility Regulatory Commission
Attn: Commission Secretary
PNC Center
101 West Washington Street
Suite 1500 East
Indianapolis, Indiana 46204

Indiana Office of Utility Consumer
Counselor
PNC Center
115 W. Washington Street
Suite 1500 South
Indianapolis, Indiana 46204
8--1 1138726 hspaxlp