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INDIANA UTILITY  
REGULATORY COMMISSION

January 9, 2016

Dr. Bradley Borum  
Director of Research, Policy and Planning  
Indiana Utility Regulatory Commission  
101 West Washington Street, Suite 1500 E.  
Indianapolis, IN 46204-3407

Dear Dr. Borum:

I am writing to comment on Indiana Michigan Power's integrated resource plan spelling out a 20-year energy plan for Fort Wayne, South Bend, Elkhart, Muncie and other communities that I&M serves.

I am a full professor, now retired from the Biology Department at Ball State University (home of the world's largest geothermal plant which has replaced on-campus carbon burning altogether). Because of my scientific background and interests in climate and sustainability issues I currently volunteer as the Regional Coordinator for Sustainable Indiana 2016 (a subsidiary of Earth Charter Indiana). When I learned of the recent SUN grants for support of solar panel installation I helped two organizations get the first solar arrays in Muncie. I also volunteer with a group of University, Sierra Club, and community individuals interested in making Muncie the greenest city in Indiana. We recently wrote and submitted a Rockefeller grant (100 Resilient Cities) for the city of Muncie, which if awarded would help make our city more sustainable.

I am very concerned that under I&M's proposed plan, the AEP Rockport plant – the sixth largest carbon polluter in the U.S. – will continue to operate for at least another 20 years. AEP Rockport is the sixth worst polluter in Indiana and second most toxic power plant in Indiana. Not only is the Rockport plant bad for the environment and public health, it's a bad deal for consumers. I&M did not choose a less expensive plan that would end the lease on Rockport Unit 2 when it expires in 2022 and instead opted not to invest in more clean energy such as solar and wind. I do not support I&M's proposed plan which is extremely shortsighted. It would spend more than \$6 billion during the next 20 years to retrofit and install expensive pollution controls and lock us into an outdated technology for years to come.

I&M can and must do better. According to I&M's own analysis, the same customer dollars re-invested in cleaner forms of energy would reduce carbon pollution 57% by 2040. Such a plan would likely create hundreds of local green energy jobs and economic opportunities in communities like mine. That would be a large step in making a cleaner and more sustainable environment in our state.

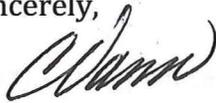
Instead of investing further in dirty coal-burning generation, I&M could instead invest in renewable energy that would directly benefit the communities that I&M serves and ensure compliance with the federal Clean Power Plan. I&M can do more

to harness Indiana's wind resources which are plentiful in I&M territory. The Indiana Department of Environmental Management estimates that Indiana potentially has five times the wind resources to meet federal renewable energy requirement of 20.5 percent clean energy by 2030. According to the Indiana Office of Energy Development as of October 2015, Indiana homes and businesses have connected about 118 megawatts (MW) of solar PV to the electric grid, most of which is sold to Indiana utilities through purchase power agreements. However, recently I&M and other utilities have attempted to push legislation to restrict energy freedom by raising rooftop solar costs and giving less than fair credit for power generated.

I am also deeply concerned the I&M-sponsored energy efficiency programs - which include home energy audits, rebates on efficient appliances and low - income weatherization programs - are proposed to fall to 7 percent of their current levels by 2021. I&M has a responsibility to help customers reduce their electricity bills through programs that help save energy, especially for those who can least afford the rising cost of electricity.

Please take these considerations into account as you review and comment on I&M's integrated resource plan and take note of I&M's missed opportunities for improved energy efficiency, enhanced future economic growth and for providing cleaner air in Indiana. Most important of all is the need for I&M to contribute to reductions in CO<sub>2</sub> emissions globally, which is absolutely necessary for future human survival.

Sincerely,



Carolyn N. Vann, Ph.D.  
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Ball State University  
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