

**Indiana Municipal Power Agency**  
**Comments to the IURC regarding Proposed Rule 170 IAC 4-7**

The Indiana Municipal Power Agency (IMPA) would like to thank the Indiana Utility Regulatory Commission for providing IMPA and other interested stakeholders an opportunity to comment on the proposed Integrated Resource Planning (IRP) rule.

For the past three years, the eight Indiana utilities required to file IRPs have done so based on a proposed rule (170 IAC 4-7). This proposed rule was developed over a two to three year period and included input from many interested stakeholders including IURC Staff, the OUCC, consumer groups, environmental groups as well as the eight utilities. Through this collaborative process, an updated and functional proposed IRP rule was developed that was acceptable to all parties.

Having filed one IRP per the proposed rule, and about to file its second, IMPA believes the current proposed rule should be made final without change, except where necessary to implement Senate Enrolled Act 412 requirements. The current proposed rule was painstakingly developed over a long period of time and included many stakeholder meetings and opportunities for comment; both verbal and through written submission to the IURC. While most stakeholders undoubtedly have certain portions of the rule they would like to see different, the proposed rule is the result of compromise and is typical of the rulemaking process. IMPA does not believe the proposed rule should be completely reopened for revision.

The proposed rule instituted the stakeholder public advisory process to be used in preparing IRPs. Per section 170 IAC-4-7-0.1, municipally and cooperatively owned as well as joint agencies are exempted from the requirements. Per the rule, IMPA, Hoosier Energy Electric Cooperative and Wabash Valley Power Association are exempt from the public advisory process. During the introductory workshop held on July 30, 2015, a verbal proposal was made to require these three wholesale utilities to participate in the public advisory process. IMPA does not believe this exemption should be removed because subjecting IMPA to the rule's public advisory process would be duplicative:

- IMPA is a non-profit entity owned and governed by the members it serves. Since IMPA members are the ratepayers, there is no conflict of interest between shareholder and ratepayer.
- IMPA's members are 59 Indiana municipalities and their utilities, all of which are subject to Indiana's Open Door Law and which hold meetings open to the public for matters concerning the utilities.
- Each of IMPA's 59 board members is a publically elected or appointed official from an Indiana city or town. These local officials are all responsible to the constituency of their own municipalities.

- IMPA has monthly board meetings whereby the board is continually updated on IMPA activities, generating resource performance and long term power supply procurement efforts.
- The IMPA annual meeting held each spring features a multiday session on electric industry topics; keeping the board educated and up to date on current industry trends.
- During the IRP preparation period, IMPA staff makes presentations to the board and receives feedback from the board members, each representing their city or town, regarding the IRP process.
- Prior to filing, IMPA IRPs are presented to the board and approved for filing at the IURC.

For the reasons stated above, IMPA believes the exemption from the public advisory process in the proposed rule should be retained.