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INDIANA UTILITY REGULATORY COMMISSION

**Indiana Michigan Power Company's Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

Submitted to:

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Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

I. Introduction

Indiana Michigan Power (I&M) submitted its 2013 Integrated Resource Plan (2013 IRP) on November 1, 2013. I&M agreed to follow the proposed IRP development and submission process under review by the Indiana Utility Regulatory Commission (IURC). On January 29, 2014, Wind on the Wires (WOW) filed comments in response to the IRP filing. On January 30, 2014, the Citizens Action Coalition of Indiana, Inc., Earthjustice and Sierra Club collectively provided comments as did the Hoosier Environmental Council. In addition, on February 28, 2014, the IURC Electricity Division Director submitted a draft report (Director's Report) regarding IRPs filed in 2013 by utilities. I&M clarified with Director Borum that it should wait until his draft Director's Report was issued and then provide a response to the interested stakeholders and the Director's Report at the same time. Please accept these comments in reply as I&M's response to the Director's Report and comments provided stakeholders.

II. I&M Integrated Resource Plan Stakeholder Process

I&M, as part of the development of its 2013 IRP, established a stakeholder engagement process, pursuant to pending revisions to the Indiana IRP rules. Interested parties were invited to three public advisory (stakeholder) meetings where participants were provided the opportunity to discuss modeling assumptions, processes and ultimately, results. Additional detailed information requested by process participants was published on I&M's website. I&M incorporated feedback, where reasonable, and explained reasons why other suggestions were not utilized, in a collaborative discussion with the meeting participants¹. After conducting the work necessary to

¹ WOW did not participate.

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

develop the IRP and considering the input provided in the stakeholder process, I&M then submitted its IRP on November 1, 2013, in accordance with the existing and proposed IRP rules.

The stakeholder process allowed for a new interaction amongst interested parties prior to the filing of the official IRP with the Commission. The interaction in the stakeholder process facilitated extended conversations on a variety of IRP topics to develop an IRP that, as the Hoosier Environmental Council's comments correctly point out, "is largely an advisory document unless and until it becomes relevant in another docket where I&M is seeking specific relief." I&M will conduct another set of stakeholder meetings associated with and prior to its next IRP to be submitted in November 2015. I&M is surprised by some of the comments filed in response to its 2013 IRP submission given the robust interactions that occurred in this process. Certain issues raised in filed comments had a forum for discussion and could have been easily discussed and resolved during the 2013 IRP stakeholder meetings if raised, while others are just speculations that will be better defined as future events unfold and will be better addressed in future IRPs. Still other comments are factually incorrect.

III. IRP Comments

The IRP is a planning document that represents I&M's view of the resource planning landscape at a point in time. It seeks to capture very dynamic information under multiple parameters and provide the reader with a sense of not only what is practical but what is probable. The IRP process is a fluid activity; assumptions and plans are reviewed as new information becomes available and modified as appropriate. The IRP is not a commitment to a specific course of action, as the future is highly uncertain. The resource planning process is becoming increasingly complex given pending legislative and regulatory restrictions, technology

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

advancement, changing energy supply pricing fundamentals, uncertainty of demand and energy efficiency advancements, all of which necessitate a respect for flexibility in any ongoing planning activity and processes.

The inputs and development of an IRP requires recognition of a developing industry, but the nature of the underlying process once that is defined follows timeworn steps in regard to assembling and distilling information that form the bases for input assumptions and modeling them in a way that is consistent with industry practice. Stakeholder input was incorporated in the assumptions or otherwise addressed in all cases.

The Director's Report indicated a desire for some information that is "one-layer down" from what was included in the IRP. I&M sought to balance the inclusion of detailed information with the readability of the document. This is a balance that can be revisited and adjusted in subsequent IRPs.

A. I&M's Reply Comments on the Director's Report

Director Borum raises a number of issues in his draft report concerning the IRPs filed. Some of the questions raised appear to request information beyond the level of detail contemplated by the proposed rule review of IRPs. However, I&M addresses each of the issues raised below. I&M extends an offer to sit down with Dr. Borum or anyone on Staff to the extent there are more questions or any of the responses below do not reach the deeper level of review shared in the Director's Report.

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

1. Issue: Load Forecast Methodology

The Company's load forecast methodology has two sets of models. They both model monthly energy sales by sector and provide monthly forecasts. The short-term models are time-series based and rely on trends and weather to describe fluctuations in sales and to provide forecasts for no longer than two years out. The long-term models rely on economic and demographic variables, energy prices and weather to model energy sales and to provide forecasts 30 years out. The goal of the blending process is to provide a reasonable forecast for the Company's planning process for both the short- and long-terms. To that end, the Company will evaluate the strengths of both the short- and long-term forecasts.

The blending process is not purely mechanical, rather it is evaluative. The Company is interested in the monthly patterns forecast for near-term planning and annual trends in the longer term. Obviously, the long-term models are used for forecasts beyond the first couple of years. The Company will compare forecasts from short- and long-term models to determine which forecast better reflects recent trends and provides a reasonable forecast to best position the Company for short-term planning. In times of economic uncertainty, the long-term models may be more in sync with economic changes than the trend based short-term model. But, the Company does not go into the evaluative process of comparing the two forecasts with a prejudice of selecting either the short- or long-term model. Rather, the Company seeks a reasonable forecast that provides the best planning parameters possible.

**Indiana Michigan Power's Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

a. Why have a detailed discussion of the short-term models if the models were not used for Indiana?

The short-term models are an integral part of the forecast and review processes. If a model is not explicitly used in the Company's load forecast, it still has an important role in analyzing the long-term model's forecast. The forecasts are compared to see which may best reflect economic and energy consumption trends. The goal of the forecasting process is to provide a reasonable forecast that best reflects expectations at the time the forecast is developed and to that end it sometimes uses the long-term forecast throughout the forecast period.

b. The explanation given about better anticipating turning points in economic growth is both vague and confusing. Are long-term load forecasting models normally used to forecast changes in economic growth?

No. The long-term models better reflect forecasted changes in the economy than do the time series based short-term models. The economic forecast drives the long-term forecast, rather than the long-term forecast being used to forecast economic growth.

c. Are the short-term models estimated separately for the Indiana and Michigan service territories like the long-term models are?

In both of the Company's jurisdictions, there are a set of short-term and long-term models estimated for each sector.

d. Was a blended forecast used for Michigan? If yes, why the difference in treatment between Michigan and Indiana?

Among the retail sectors in Michigan, only the commercial sector's forecast was blended. As with Indiana, the forecast review process determined that the long-term forecast better reflected recent reasonable trends and economic growth expectations than did the short-term forecast.

**Indiana Michigan Power's Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

e. Did I&M use the blended forecast in the 2011 IRP? If yes, what changed between 2011 and now to warrant this change in the 2013 IRP?

In the 2011 IRP, the Indiana residential energy sales forecast was blended and the other Indiana retail sectors relied on the long-term forecast. The commercial and other retail sectors were blended in Michigan, while the residential and industrial sectors reflected only the long-term forecast. The blending process for the forecast used in the 2011 IRP is similar to what is currently used by the Company, with the same objective of providing a reasonable forecast.

f. I&M states on page 54 there have been some changes to the load forecast methodology. What are the changes?

As stated on page 54 of the 2013 IRP, changes have been minimal. The basic modeling structure has not changed, but all long-term models and all input variables in long-term models are now monthly instead of quarterly or annually.

2. Issue: Scenario/Risk Analysis - The relationships between the scenarios are counterintuitive. For instance, the Base case price is lower than both the Lower Band and the Higher Band prices from 2017-2029. No explanation for this is provided.

The *Aurora*^{XMP} model determines capacity price based upon the revenue needed to make the marginal capacity unit whole. The high case capacity price is greater than the capacity price in the reference case because the revenue required to make the marginal capacity unit whole is higher. The same is true of the low case capacity price when compared to the reference case. This is because the marginal capacity unit high and low cases have higher fixed costs than in the reference case. It is a coincidence that the high and low cases result in similar capacity pricing.

Indiana Michigan Power’s Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

3. Issue: Use of old Load Forecast

The use of two load forecasts was not ideal, but is a result of the stakeholder process. The exercise undertaken to have stakeholders define resource plans and run their scenarios and discuss the outcome was a lengthy process, but one the Company feels provided the stakeholders a glimpse into the difficulty of being the utility and designing and being responsible for a plan. The stakeholder process spanned six months, so it is not surprising that an update in the load forecast occurred in the interim period. But this ultimately did not have a material impact on the substance of the stakeholder portfolios. As pointed out in subsequent comments, the difference between portfolios optimized under the two load forecasts was minimal. In fact, there was nothing to suggest that these portfolios would have been materially different in any way—*i.e.*, amount, timing or ‘type’ of resources selected—had the stakeholders re-established their respective profiles based on the updated load forecast. Ultimately, comparisons of stakeholder portfolios and the portfolio optimized under the new load forecast were done as overtly as possible and cannot “mislead” the reader to any conclusion that is not factual.

4. Issue: Methodology

I&M had stakeholders construct portfolios that encompassed a wide range of resource options. The range of resource options was far more diverse than what would have been developed with modeling-derived optimizations based on the low and high long-term commodity pricing scenarios. For instance, because the Rockport and Cook plants have been and continue to be economically-viable, going concerns, and I&M’s load is relatively static, it cannot be surprising that practical resource portfolios are not wholly different.

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

5. Issue: CO₂ Sensitivity

Determining a break-even cost of carbon dioxide, where the Rockport units are no longer viable, was an issue addressed during the stakeholder meetings. Today, coal-fired generation provides up to 40 percent of this nation's energy needs. Therefore, it was discussed that for the very efficient Rockport units to become un-dispatchable due to any assumed high carbon pricing threshold would infer that the overall U.S. coal fleet was similarly unviable; a situation which is not tenable. Thus, a carbon price that would cause, specifically, the Rockport units to sit idle is not a realistic carbon price proxy.

6. Issue: Treatment of Energy Efficiency Resources

Energy efficiency is a topic of great interest to many of the stakeholders who attended meetings and readers of the IRP. It is also a very difficult resource to quantify prospectively in terms of cost and performance given the vast differences between reported past program performance in other, dissimilar states prior to the phase-in of significant efficiency standards and industry-intensive, high heating and cooling load, post-phase-in, Indiana.

a. I&M does not explain in the IRP what the “forecasted expected performance in Indiana” for energy efficiency programs is. Nor does I&M explain or demonstrate how this level was established.

The reduced quantity of energy efficiency assumed embedded in the forecast was the result of management judgment given the realized results of the prior three years and the phase-in of lighting standards, which will greatly reduce the ability of future energy efficiency programs to achieve lasting energy savings above load forecasts which will naturally *include* those standards.

**Indiana Michigan Power's Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

- b. How was the load forecast modified to reflect the impact of energy efficiency trends and programs? The reader assumes this was done for the residential and commercial sectors by adjusting the Statistically Adjusted End-Use Model (SAE) component of each model, but the methodology and data adjustments are not discussed.**

The SAE models reflect the impact of Federal regulations on energy efficiency requirements for appliances, equipment and lighting. The models will also reflect the historical trends in Company-sponsored Energy Efficiency (EE) programs. The forecast reflects what the Company reasonably expects to attain in Commission-approved EE programs (i.e. Core and Core Plus). The expected EE impact is subtracted from the load forecast to provide the final load forecast projections.

- c. How does the industrial load forecast model reflect the impact of existing energy efficiency programs?**

To the extent that EE programs have occurred historically, they will be reflected in industrial sales model trends. Otherwise, the Company's estimation of EE program impacts on load will be subtracted from the load forecast to provide the final load forecast projections.

- d. I&M used data from Efficiency Vermont, but does not specify the exact information used and how it was modified for use in Indiana.**

I&M used the cost and performance statistics of energy efficiency programs administered by Efficiency Vermont for the year 2011 and available on their website. Costs, which are utility costs (revenue requirements) were faithfully replicated while performance data was altered in the following way(s):

- i. For climate-sensitive measures such as air conditioning, I&M-specific cooling degree-days were used to increase the energy savings vis-à-vis such load

**Indiana Michigan Power’s Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

expectations in the state of Vermont. The reverse was true when establishing heating measure performance using heating degree-days.

- ii. Net-to-gross values for lighting measures were changed to reflect more typical values.
 - iii. Lighting performance was reduced to reflect the standards that are in place currently that were not in place in 2011.
- e. I&M validated the load forecast by using the *Plexos* model to optimize energy efficiency resources starting in 2014, but does not specify the results. The reader is left to assume the load forecast was “validated” but it is unclear what exactly that means.**

By validated the Company means that the validation recognizes that achieving this level of savings would result in significant avoided costs. However, that statement does *not* imply that the mandated efficiency levels are achievable at any reasonable cost.

- f. Do the extrapolated prospective DSM programs include impacts representative of the current lighting programs? If yes, is this a reasonable assumption given the impact of lighting efficiency standards discussed by I&M in the report?**

Projected I&M 2020 energy efficiency measures include some lighting programs, but are anticipated to be available in limited amounts. For instance, current codes and standards do not cover “specialty” bulb applications and it is reasonable to assume some programs to address this, but at levels that are significantly smaller than current lighting programs. On the commercial side, there are alternatives that represent energy savings (*e.g.*, T8 -to- T5) that are currently expensive, but will likely become more cost effective over time. However, those retrofits will save, in most cases, well less than half as much energy as a current T12 -to- T8 retrofit and thus offer more limited benefits.

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

7. Issue: Treatment of Distributed Generation

Distributed resources were modeled at their full (avoided) retail rate, which represents its impact on revenue requirements. (Note, this is also how energy efficiency resources are modeled). The 'full retail rate' is derived from a weighting of the tariffs for commercial and residential customers. The suggestion that distributed generation could or should be modeled at its capital cost is problematic. First, what a rooftop solar, or any other distributed generator pays for their generation is unknown but, more importantly, does not currently factor into what costs find their way into rates. Second, for capital costs to be considered, a scheme where a customer hosts a utility-owned asset and continues to pay their current tariff would have to be in place. That may be a possible arrangement, although not without significant issues, but it does not add anything to the analysis that having a "utility-owned" option does not already include. Third, a hybrid approach, where the utility would be willing to pay what the distributed generation was worth (or less) would not have been particularly informative. Even though it might appear as an option, there would be considerable doubt as to customer adoption rates and the viability of the scheme in light of current net metering requirements to pay the full retail rate. Conversely, paying an incentive in excess of the net metering rate would only be less cost-effective to non-participating ratepayers, but may increase adoption rates.

Figure 4E-3, at page 93, (repeated as Figure 8C-2 at page 184) of the 2013 IRP shows the estimated increasing cost of net metering payments (*i.e.*, its present value over 25 years with an assumption of annual increases) - the customer's perspective; and a similarly constructed line using the forecast of energy and capacity value in PJM - the utility's perspective. It should not be entirely surprising that the fully-bundled cost of delivered electricity—the full retail/net

**Indiana Michigan Power’s Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

metering rate—exceeds the projected market cost of generation (energy and capacity). Comparatively, the PV cost lines are merely the expectations of declining costs of PV solar. At the point where the lines cross, depending on your perspective—whether from a utility’s or a customer’s—the decision to install solar becomes economical.

Determining how much solar will be added is, at this point, a matter of judgment. Clearly, some customers have installed panels well before they could be considered economical, and some never will, regardless of economics. The addition of distributed solar in any reasonable quantity does not change the fact that I&M has sufficient capacity (and energy) with or without this incremental solar.

B. I&M’s Reply Comments on Comments filed by Wind on the Wires, the Citizens Action Coalition of Indiana, Inc., Earthjustice and Sierra Club, and the Hoosier Environmental Council

1. Issue: Energy efficiency was not modeled on an equivalent basis as supply-side resources and was unfairly limited.

This criticism from the Citizens Action Coalition of Indiana, Inc., Earthjustice and Sierra Club (collectively “Environmental Respondents”) is meritless. First, as explained during the stakeholder meetings, “embedding a known resource” is common practice for both supply and demand resources. For instance, I&M included the output from the Cook Nuclear Plant in all cases. The model was not allowed to select or reject that resource, very much akin to the energy efficiency resources assumed to be acquired prior to 2020. After 2020, energy efficiency resources were an option and were included as part of I&M’s Preferred Portfolio. While there is disagreement about the cost of the resources in the next decade, there is ample time prior to any post-2020 program filings to refine those estimates.

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

When it comes to limiting the energy efficiency resource to something less than a level that comports with the Phase II Order, this is somewhat a moot point given I&M's lack of forecasted load growth. Environmental Respondents and others can insist that the Phase II order be met or exceeded, but in I&M's experience and judgment, and in light of the Energy Independence and Security Act of 2007 (EISA 2007) and the American Recovery and Reinvestment Act of 2009 (ARRA) standards, it is not the probable case. I&M participates in the statewide programs developed from the Phase II Order and implemented its own Core Plus programs implementing demand-side management and energy efficiency programs specific to its territory. But as the Commission indicated in a recent entry opening an investigation on demand-side management issues, the Phase II Order goals are not mandates.² The IRP filing is intended to reflect the Company's best estimate of future conditions. Last, it must be pointed out that several stakeholder portfolios were constructed and evaluated which included levels of energy efficiency in excess of the requirements in the Phase II Order.

2. Issue: Distributed solar resources are undervalued.

I&M's Preferred Plan includes levels of distributed solar that greatly exceed what is currently connected to its system. The level of cost detail requested would have been supplied at a stakeholder meeting when this issue was discussed, if there was a request for it. I&M stands behind its conclusions.

² Order Cause No. 44441 at 1 (January 15, 2014)

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

3. Issue: Cogeneration and distributed wind resources were not evaluated.

As explained during the stakeholder meetings, I&M evaluated distributed resources using a solar load shape. The solar load shape provides the most "PJM" value per unit of energy to I&M because of its relative high coincidence with PJM's peak, and relatively low capacity factor, and thus was a suitable or even a "best case" proxy for any or all distributed technologies.

While I&M agrees with Environmental Respondents that there is nearly 2,500 MW of Combined Heat and Power (CHP) capacity in Indiana, if you aggressively round up (the actual total is 2,266 MW³), it must be pointed out that only 0.25 percent of that capacity has been added in the last 10 years. The reason for this is simple, and was pointed out in ACEEE's 2011 CHP assessment, "Electricity is extremely inexpensive in Indiana, so an economically viable opportunity is hard to find."⁴ This point was raised by the Hoosier Environmental Council where their comment was essentially, that avoided costs are too low. To remedy that would amount to an argument for treating demand resources differently from supply-side resources. The mechanisms are in place for regulatory recovery of CHP investment and I&M will incorporate CHP as a resource at such time as it becomes more economically viable.

With regards to distributed wind resources, I&M would further point out that 251 kW of nameplate generation currently on I&M's net metering tariff is producing less than 0.5 GWh annually, which for a system the size of I&M's, is a rounding error (approximately 0.003 percent). There is little prospect that distributed (non-utility) wind generation becomes anything

³ See DOE CHP database <http://www.eea-inc.com/chpdata/States/IN.html>

⁴ Challenges Facing Combined Heat and Power Today: A State-by-State Assessment, Sept 2011, ACEEE Report Number IE111. Pg 40.

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

other than a niche resource given the limited ability to site it and its relatively high cost that will have no discernable impact on system requirements. At a minimum, there will be many more IRPs where that statement can be revisited.

4. Issue: I&M did not use the correct capacity factor to evaluate solar resources.

In stark contrast to other respondents, WOW feels that solar was given too great an advantage by using a 38 percent capacity factor. I&M would like to point out the distinction between “capacity value” or “useful capacity” and “capacity factor.” As defined in PJM Manual 21, solar has an initial capacity value of 38 percent, which means that, on average, solar resources are producing at 38 percent of their nameplate capacity at the time of PJM’s summer peak (2 PM – 6 PM in June, July, and August). Solar has an estimated annual capacity factor of approximately 16 percent in Indiana, which means that, on average, solar resources will produce an equivalent of 16 percent of their nameplate rating over an entire calendar year. This was a topic discussed in the stakeholder meetings. As explained during those meetings, this is an accepted understanding and methodology among PJM stakeholders and I&M used in its modeling a solar shape with those approximate values.

5. Issue: I&M assumes regulations governing greenhouse gas emissions will become effective much later than is reasonable.

Environmental Respondents provided comments regarding the implementation timeline for new greenhouse gas (GHG) regulations. While I&M appreciates their insights into the potential impact of GHG regulation, in reality, no one knows how such regulation will impact I&M’s existing coal-fired sources. As Environmental Respondents are aware, for existing sources, the United States Environmental Protection Agency (EPA) was directed to propose

Indiana Michigan Power's Reply to the IURC and Stakeholder Comments on the 2013 Integrated Resource Plan

GHG New Source Performance Standards (NSPS) by June 1, 2014, and finalize those standards by June 1, 2015. States would then develop and submit a plan to the EPA for implementing the existing source standards by June 30, 2016. Implementation of the standards will occur after the EPA approves each state's plan. Further, it is common for implementation periods for programs of this magnitude to extend over a number of years. Any significant controversy or litigation regarding the standards could extend the implementation timeline.

For example, EPA first adopted standards for the Regional Haze Program in 1999, but revised the rules in 2005 as a result of litigation. States are still in the process of submitting plans to satisfy those requirements, and sources have up to five years after EPA approval to implement the state plan requirements. Looking at this schedule in total indicates that the timing for implementation of GHG requirements for existing sources is in line with I&M's assumptions in the IRP analysis.

6. Issue: I&M assumes a cost of carbon dioxide (CO₂) emissions that are less than reasonable.

Environmental Respondents express concern about I&M's assumed cost of CO₂ emissions once such rules are implemented. Again, while I&M appreciates Environmental Respondents' insights and opinions on this matter, no one knows what cost, if any, will be assigned to CO₂ emissions. In any event, while various parties can opine as to the magnitude of such costs, the actionable steps I&M would take to mitigate risk in this regard are those that are recommended in the Preferred Plan.

**Indiana Michigan Power's Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

7. Issue: I&M does not address sulfur dioxide (SO₂) National Ambient Air Quality Standards (NAAQS).

Similar to GHG regulations, until state implementation plans are submitted to EPA and approved, the timing and extent of any potential remediation by I&M is uncertain. If a plan requires I&M to add a flue gas desulfurization (FGD) system at Rockport, then the only issue relative to the Preferred Plan is timing, as I&M includes FGDs to be installed at the Rockport Plant in the late 2020s. Stakeholders, through the stakeholder process, could have asked I&M to analyze a portfolio where the FGD equipment installation was accelerated if this was a concern.

8. Issue: I&M did not disclose assumed effluent limitation guidelines (ELG) and coal combustion residuals (CCR) related cost for the Rockport Plant.

Although I&M stated that it included costs associated with these proposed environmental rules, Environmental Respondents are concerned that these costs were not provided so that they could determine if they were reasonable. I&M could have made this data available during the stakeholder process if the concern was made known to I&M at the time.

9. Issue: I&M did not address the impact of the possible reinstatement of the Cross State Air Pollution Rule (CSAPR).

I&M did not address the reinstatement of CSAPR because CSAPR is currently vacated, and the Clean Air Interstate Rule (CAIR) remains in effect.

10. Issue: I&M used natural gas prices that are higher than those of others, such as the U.S. Energy Information Administration (EIA), and capacity costs that exceed the PJM market price.

I&M's commodity price forecast development, as well as the shortcomings of EIA's projection, were discussed during the first stakeholder meeting on March 7, 2013. Interestingly, the spot price of natural gas today exceeds I&M's forecast significantly; and the I&M forecast for 2014 is closer to the New York Mercantile Exchange (NYMEX) future price than is the EIA

**Indiana Michigan Power’s Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

forecast. As for capacity prices, and as explained at the first stakeholder meeting, the *Aurora*^{XMP} model produces a suite of energy and capacity prices that, together, provide a sufficient economic signal to build or retire capacity. While the resultant “capacity” price is reasonably indicative of what may be experienced in PJM, it is not intended to be a stand-alone capacity price that is directly comparable to a PJM auction price. In any event, short-term anomalies that are largely a consequence of the recession and the influx of non-permanent resources cannot be expected to continue over the longer term.

11. Issue: I&M did not address the risk of receiving power from Ohio Valley Electric Corporation (OVEC).

Power from OVEC is assumed to be available during the entire IRP period. There may certainly come a point where the OVEC power is no longer economical, or the OVEC units are retired. Being that the IRP is prepared every two years, there will be plenty of opportunities to revisit the OVEC entitlement to determine the timing of a potential replacement.

IV. Conclusion

In conclusion, I&M’s assumptions in developing its IRP, and its treatment of existing and proposed resources, are reasonable and appropriate. Prior to reaching its final conclusions, I&M met with interested stakeholders under the Commission’s proposed process and initiated a dialogue on IRP topics. That process and nature of the dialogue exchanged for the issues raised appeared to address a number of the stakeholder’s concerns. I&M reiterates its offer to meet with interested Staff of the Commission if such a meeting is determined to be beneficial to further discuss these matters or any deeper analysis of the issues involved. I&M appreciates the

**Indiana Michigan Power's Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

opportunity to participate in the comment process and trusts its comments will help alleviate any concerns with the IRP document produced by the Company.

Respectfully Submitted,

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**Indiana Michigan Power's Reply to the IURC and
Stakeholder Comments on the 2013 Integrated Resource Plan**

Certificate of Service

I&M certifies that on March 31, 2014, a copy of these Response Comments were submitted electronically to the Director of the Electricity Division of the Commission and served via electronic mail on the Office of the Utility Consumer Counselor and the following interested parties that submitted written comments:

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