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October 3, 2011

DeAnna Poon  
Assistant General Counsel  
Indiana Utility Regulatory Commission  
101 W. Washington Street, Suite 1500E  
Indianapolis, IN 46204

Dear Ms. Poon:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 11-426 and proposed by the Indiana Utility Regulatory Commission ("IURC"). The proposed rule amends 170 IAC 6-1.1-4 to require a utility to give notice to its wholesale customers when it makes a distribution system improvement charge filing. The proposed rule also amends 170 IAC 6-1.1-8 to require utilities to file reconciliation reports for all reconciliation periods.

The economic impact statement prepared by the IURC indicates that three small businesses would be subject to the proposed rule. Utilities choose whether to employ the distribution system improvement charge which subjects them to IURC regulations. The economic impact statement also indicates that the three small businesses currently subject to this regulation would experience no economic impact from the proposed rule.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 234-3997 or [eshields@iedc.in.gov](mailto:eshields@iedc.in.gov).

Regards,

A handwritten signature in black ink, appearing to read "Eric P. Shields". The signature is fluid and cursive.

Eric P. Shields  
Policy Director