

Roads, Beth Krogel

From: Nicholas_Stanger@swissre.com
Sent: Wednesday, August 03, 2011 4:21 PM
To: Roads, Beth Krogel
Subject: Comments re: Indiana's voluntary Clean energy Portfolio Standard (CPS) IC 8-1-37

Hello! I heard you speak at WIndiana in July in Indianapolis. In your presentation, you said that first-round comments would be accepted through August 15th. On behalf of the Whitley County Concerned Citizens (WCCC), these are our comments:

(1) IC 8-1-37-4 defines "clean energy resources" / renewables from which regulated public utilities can get credit such as wind; our concern is this: Why are unregulated renewables exempt from being burdened by regulations like public utilities? e.g., wind turbine siting - it's the wild west out there, and counties and wind developers can work together and do as they please with ordinances and setbacks that are too short and don't protect neighbor's rights and property values, etc. yet there is NO guideline, NO state oversight, nor really any accountability whatsoever;

(2) IC 8-1-37-12 defines the 'qualifications for shareholder financial incentives'. Under (d) how will 'just and reasonable' be determined relative to a the amount of 'increase in the rates and charges' of the electricity supplier due to the cost of clean energy resources available to the electricity supplier? Don't ALL incentive programs ultimately increase the rates charged to Indiana's citizens? Our position is that any program like this per Indiana Code must be *cost and revenue neutral* - i.e., any incentive paid to electric utilities to encourage the use of renewables must come from a cost cut somewhere from within the renewables sector, and not from increasing rates to consumers.

Thank you.

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