

April 10, 2012

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101 West Washington Street  
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**RM#11-07: Integrated Resource Planning Rulemaking**

Dear Beth:

Enclosed are Wind on the Wires comments on the strawman revisions to 170 IAC 4-7, *Guidelines for Electric Utility Integrated Resource Plans*, for staff's consideration. Our comments address the following five points: [1] integrated resource plans need to analyze the CHOICE plan a utility submits, or has approved, for their enrollment in the Indiana Voluntary Clean Energy Portfolio Program; [2] utilities should compare their resources to those of third party resource providers (sec. 4-7-6 and 4-7-8); [3] the benefits of the acknowledgment process (Sec. 4-7-2) and the benefits of the public advisory process (sec. 4-7-2.1); [4] the Commission should publish integrated resource plans (sec. 4-7-2(k)); and [5] utilities should continue to provide information about a variety of load shapes, including annual, seasonal, monthly and other relevant load shapes (sec. 4-7-5(a)(1)).

## **COMMENTS**

### **IRP Plans Need to Analyze the Utility's CHOICE Plan**

The integrated resource plan (IRP) process should account for the CHOICE plan utilities submit as part of their Voluntary Clean Energy Portfolio Standard ("VCEPS"). Utilities interested in receiving the incentives offered in the VCEPS Program are to submit a CHOICE Plan identifying how that utility intends to obtain at least ten percent of the total electricity it supplies to its customers from clean energy resources. The VCEPS rule states that the clean energy resources are to be evaluated through the IRP modeling, but the current rule does not provide for such modeling. Wind on the Wires has provided edits to section 4-7-6 of the strawman rule that reflect this proposed amendment.

### **Utilities Should Review and Compare Their Services to Those of Third Party Resource Providers**

The preferred resource portfolio is supposed to be a mix of resources that provide the lowest reasonable cost. (sec. 4-7-1(ee) of the strawman) As a check on the reasonableness of those costs, the utility should have to compare the cost of their resources to those of third party resource providers. Wind on the Wires recommends that this be done as part of the Resource Assessment (sec. 4-7-6 of the strawman) and development of a resource portfolio in its Resource Integration (sec. 4-7-8 of the strawman) analysis.

## **The Acknowledgment and Public Advisory Processes are Improvements to the IRP Process**

The Acknowledgment and Public Advisory processes are additions to the current IRP process. The Acknowledgment process (sec. 4-7-2 of the strawman) provides Staff feedback to the utility on the content of the plan to ensure the utility has provided the information delineated in section 4(a) of the rule with sufficient supporting material. Moreover, the Acknowledgment process maintains Staff's impartiality towards a utility's specific resource actions, while discouraging utilities from submitting IRPs that report only the individual Utility's current planning and resource preferences.

The Public Advisory process (sec. 4-7-2.1 of the strawman) provides public and private stakeholders the opportunity to be updated on key aspects of a utility's IRP and to provide comments. Utilities will only need to consider and respond to relevant comments, therefore, keeping utilities free from the burden of replying to issues unrelated to the IRP process. Wind on the Wires welcomes the changes the Commission has made to bring review and insight into the IRP process.

## **IURC Should Publish the Integrated Resource Plan of Each Utility on its Website**

Proper availability and access to resource plans should be encouraged for technical and non-technical audiences. Wind on the Wires welcomes the proposed changes allowing the Commission to publish an IRP on its website, in addition to requiring the utility to publish a graphical summary on its website.

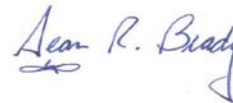
## **Use of Multiple Load Shapes**

To properly analyze the impacts and benefits of all resources the utility needs to look at a variety of load shapes. Renewable resources are known to have capacities that vary seasonally, monthly and daily. Therefore, continuing to look at historical and forecasted demand and energy usage (sec. 4-7-5(a) of the strawman) allows the utility to better evaluate the benefits of renewable energy resources.

## **Conclusion**

Wind on the Wires has prepared replacement language that accompanies the comments above. Those edits are provided in a redline version of the strawman rule. Wind on the Wires requests that you adopt the changes in the redline version of the rule.

Respectfully submitted,



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