

March 23, 2012

Beth Krogel Roads
Legal Counsel, RTO/FERC Issues
Indiana Utility Regulatory Commission
101 W. Washington St., Suite 1500 East
Indianapolis, IN 46204

Dear Ms. Roads:

Following the IRP Workshop on February 10, 2012, these are Wabash Valley's comments on the IRP Strawman.

170 IAC 4-7-2 Sec. 2. (a) (2) The following utilities, or their successors in interest, must submit to the commission an IRP that covers at least a 20 year planning horizon consistent with this rule according to the following schedule: Indianapolis Power and Light Company, Northern Indiana Public Service Company, Southern Indiana Gas and Electric Company, and Wabash Valley Power Association on November 1, 2014, and biennially thereafter.

Wabash Valley recommends a three-year IRP filing cycle to balance the commission's need for timely updates with a utility's resource allocation to produce an IRP.

170 IAC 4-7-2 Sec. 2. (d) The documents listed in subsection (c) shall be submitted electronically to the director of the commission's electricity division.

Will the IURC require submission of each utility's IRP through the IURC's Electronic Filing System located at <https://myweb.in.gov/IURC/efs/>? This section may need to be clarified to prescribe the manner of submission.

170 IAC 4-7-2 Sec. 2. (e) The commission staff shall notify the utility and interested parties of its determination of whether to:

- (1) acknowledge the IRP; or**
- (2) identify compliance deficiencies.**

This section should incorporate a deadline for the IURC to acknowledge or identify deficiencies with the submitted IRPs. Based upon the 75 day comment period and 30 day response period detailed in Sec. 2. (m) and (n), Wabash Valley proposes a 120 day deadline for the IURC to respond.

170 IAC 4-7-2.2 Contemporary issues meeting

This section should incorporate a deadline for the contemporary issues meeting so that any guidance issued by commission staff as a result of the meeting can be incorporated into each utility's IRP development process. Wabash valley proposes a deadline for the contemporary issues meeting no later

than the last working day in May of each year. Additionally, Wabash Valley proposes that any guidance provided by commission staff be issued no later than 45 days after the meeting.

170 IAC 4-7-4 (b) (10) – (12) Methodology and documentation requirements FERC Form 715

These sections should acknowledge that certain parts of FERC Form 715 and “transmission maps, including the utility’s generating stations, substations, and interconnection ties” are deemed Critical Energy Infrastructure Information (CEII) and should be filed confidentially without a request for waiver.

170 IAC 4-7-5 (a) (1) A historical and projected analysis of a variety of load shapes, including, but not limited to, the following:

- (A) Annual load shapes.
- (B) Seasonal load shapes.
- (C) Monthly load shapes.
- (D) Selected weekly and daily load shapes. Daily load shapes shall include, at a minimum, summer and winter peak days and a typical weekday and weekend day.

The IURC should evaluate whether an analysis of all these load shapes provides value. During the IRP Workshop, the utilities indicated that an annual load shape is the most utilized.

170 IAC 4-7-8 (b) Discuss the financial impact on the utility of acquiring future resources identified in the utility's preferred resource portfolio. The discussion of the preferred resource portfolio shall include, where appropriate, the following:

- (D) The impact of the preferred resource portfolio on the utility's rate.

The IURC should evaluate whether providing an estimated impact of the preferred resource portfolio on the utility’s rate provides value.

170 IAC 4-7-10 Updates

- (a) The utility may provide an IRP update if substantial unexpected changes occur.
- (b) Upon the request of the commission or its staff, the utility shall provide the requested updated IRP information.
- (c) The utility shall report its implementation progress between IRP filings in a manner to be specified by the Commission or its staff.

The IURC should clarify how changes are to be communicated. Should changes be communicated via letter, through the Summer Reliability process, or in some other manner?

If you have any questions on Wabash Valley’s comments, I may be reached at (317) 481-2862.

Sincerely,



Brenda Melendez, Lead Analyst, Budgets & Forecasts