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Beth Krogel Roads  
Assistant General Counsel  
Indiana Utility Regulatory Commission  
101 W. Washington Street, Suite 1500 E  
Indianapolis, IN 46204

November 8, 2012

Re: IURC RM #11-07—IRP rulemaking comments

Dear Ms. Roads:

The Sierra Club Hoosier Chapter, Citizens Action Coalition of Indiana, Hoosier Environmental Council, Indiana Distributed Energy Alliance and the Environmental Law and Policy Center jointly submit these comments in response to the request for additional input you made at the contemporary issues technical conference on October 18. Specifically we would like to share our thoughts on whether the commission should have an emergency rule in place while the proposed rule is being finalized and on the fiscal impacts of the proposed rule.

We believe it is imperative that the commission adopt an emergency rule so all parties know exactly what the requirements are as the first four utilities develop their plans for the November 1, 2013, submission deadline. With an emergency rule in place, stakeholders can work collaboratively with the utilities to make the initial planning process as effective as possible. Without such a rule, the commission could well find itself reviewing four plans next year developed using very different procedures, which could only lead to more confusion and, potentially, conflict.

Regarding the fiscal impact of the proposed rule, we hope the commission will take into account the substantially lower costs that utilities as well as their customers are likely to realize from an effective, transparent and participatory planning process. The additional expenditures that utilities might encounter to coordinate such a process will be recouped many times over as input from commission staff and members of the public during the IRP development process helps the companies in better assessing future needs and business, financial and regulatory risks than has occurred in the past. Moreover, the resources expended by utilities, staff and other interested parties in the collaborative process will help to avoid much greater resource commitments to address unresolved issues through litigation during contested certificate of need proceedings.

Finally, we wish to thank the commission and its staff for the excellent manner in which it has conducted this rulemaking. The openness and intellectual rigor of the process are reflected in the rule, which we are confident will result in much better planning.

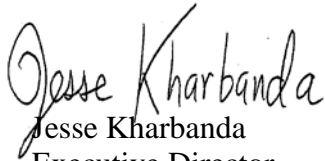
Sincerely,



Bowden Quinn  
Conservation Director  
Sierra Club Hoosier Chapter



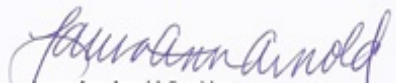
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