

# Wabash Valley Power

energy smart

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November 12, 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 Contemporary Issues Technical Conference on October 18, 2012, these are Wabash Valley's comments.

WVPA encourages the IURC to issue an emergency rule to assure all Indiana utilities of the manner and timing of their respective submissions. It is WVPA's understanding that the emergency rule would specify that the Draft Proposed Rule dated 10/04/2012 would be in effect until a new revised rule is implemented through the official rulemaking process. WVPA suggests that the emergency rule be issued no later than six months in advance of the November 1, 2013 filing date.

On September 13, 2012, WVPA provided an estimated annual financial impact of the proposed changes of approximately \$50,000 - \$100,000. Although the exact manner in which WVPA will comply with the new integrated resource plan rule is yet to be determined, WVPA may incur increased costs in development of its Power Requirements Study (PRS), development of the IRP summary document, and potentially in analyzing and/or applying contemporary methods. Due to WVPA's size, some of these tasks may need to be outsourced.

Additional PRS Scenarios	\$ 5,000 - \$10,000
Additional Stochastic or Econometric Model Runs	\$50,000 - \$85,000
Development of an IRP Summary Document	\$ 5,000 - \$10,000

Sincerely,

**WABASH VALLEY POWER ASSOCIATION, INC.**



Brenda Melendez  
Lead Analyst, Budgets & Forecasts