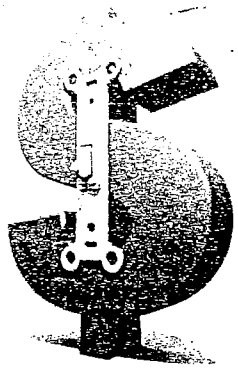
Reinstate Indiana's Energy Efficiency Programs!



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Cody Baker
500 E. Rhorer Rd.
Bloomington IN 47401

Regarding the IURC's EE/DSM recommendations, please recommend to Gov. Pence that Indiana enact strong statewide energy efficiency policy that establishes:

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's

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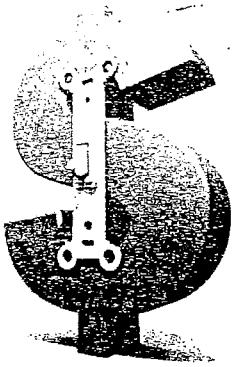

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Elizabeth Conder
3607 E Morningside
Bloomington IN 47405

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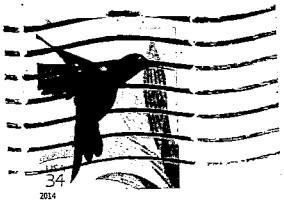

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

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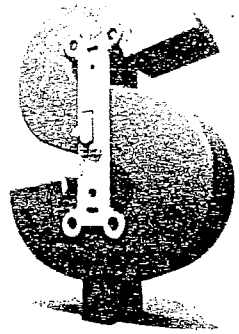

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D. Fannicum
4802 S. Old St. RD37, Apt. 5
Bloomington, IN 47401

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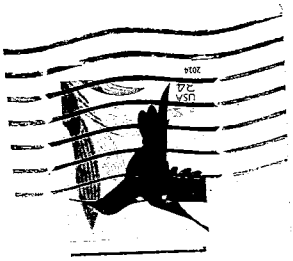

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

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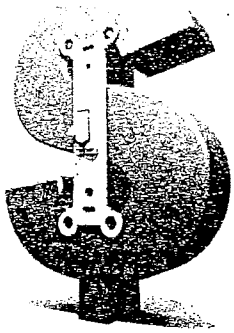

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U. Gwaiyra Dabel
1005 Deer Lick Rd
Bloomington IN 47401

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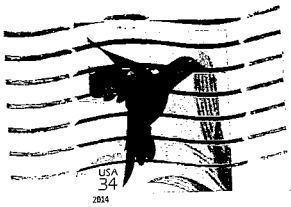

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Indianapolis, IN 46204

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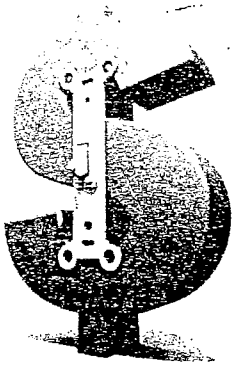

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Andy Ashler
910 Prospect St
Indianapolis, IN 46203

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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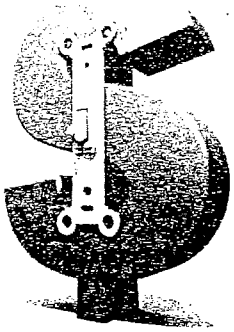

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John Buchanan
301 Clear Creek Rd.
Bloomington, IN 47403

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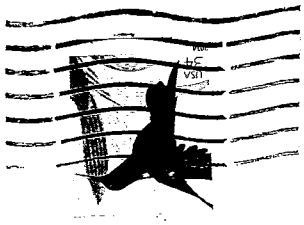

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Indianapolis, IN 46204

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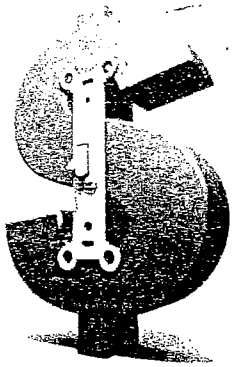

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Aaron Brewington
5801 S Rogers St
Bloomington, IN 47403

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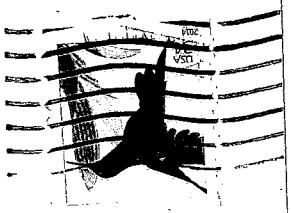

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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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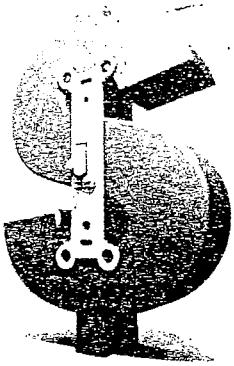

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A. Cottier
532 N Kerry Dr
Bloomington IN 47408

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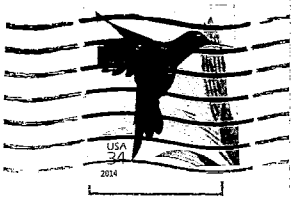

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

Reinstate Indiana's

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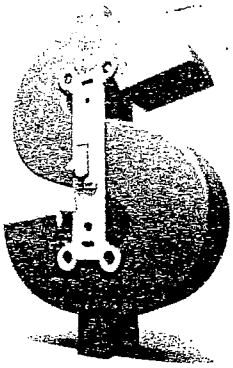

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Andrew Pabrowski
5308 S. White Pl.
Bloomington IN

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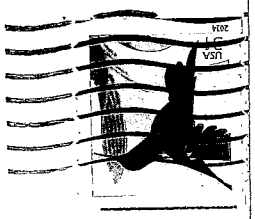

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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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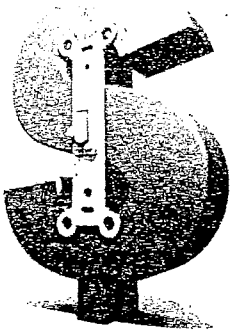

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Andy Karegi
808 Winding Brook Ln
Greenwood, IN 46142

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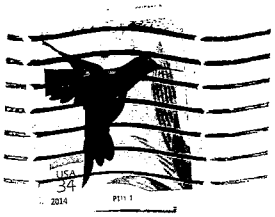

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

Reinstate Indiana's

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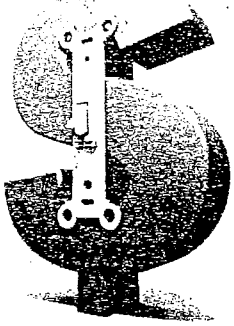

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Ariadne J. Lieber
3801 E. Morningside Dr.
Bloomington, IN 47408

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Indiana Utility Regulatory Commission
Attn: Beth Kroegel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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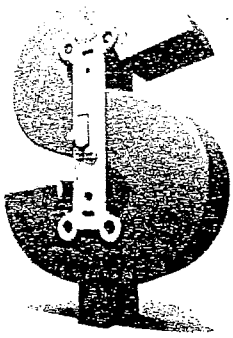

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Amie McCarty
602 N. Kerry Dr.
Bloomington IN 47408

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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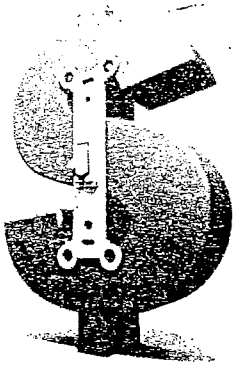

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B. Alexander
4303 E. Stephens Dr.
Bloomington, IN 47408

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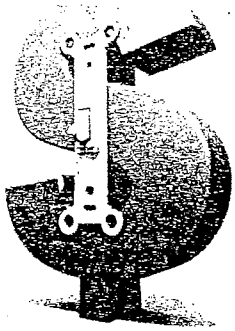

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Beth Bunch
624 Oak Dr.
Greenwood IN
46142

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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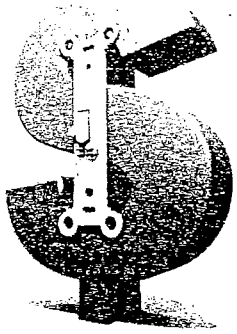

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Bryson Day
212 S. Smith Rd
Bloomington, IN 47408

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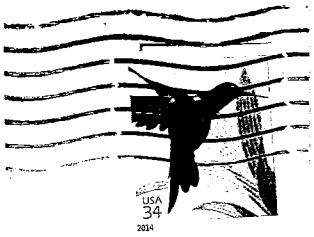

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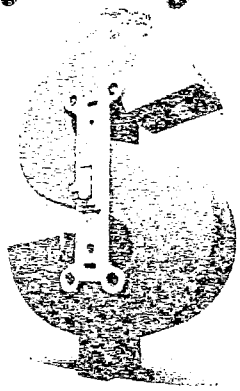

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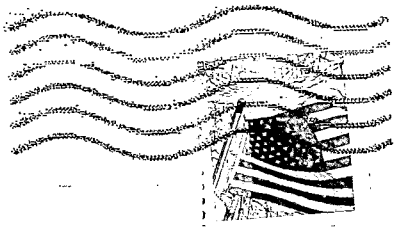
ERNIE FREY
5024 W. SEPTEMBER DR.
BLOOMINGTON, IN 47404



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Indianapolis, IN 46204

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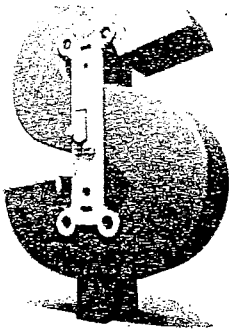

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B. Smythe
416 Olive Ave
Franklin, IN 46131

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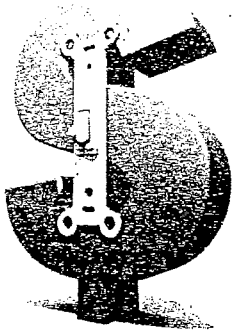

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Carla + Bruce Wheeler
700 Young St.
Franklin, IN 46131

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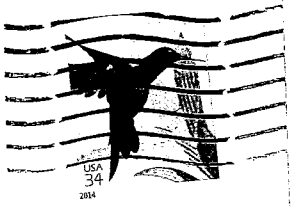

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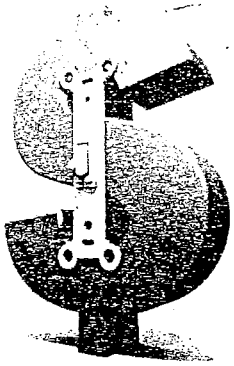

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Constance Bailey
348 W. Persimmon
Bloomington, In

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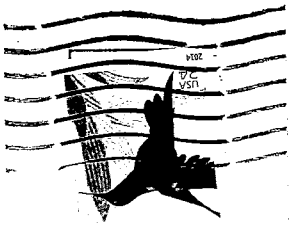

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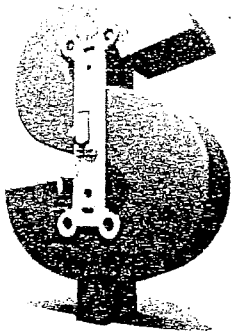

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Carol Benedyk
510 E. Holland Dr.
Bloomington, IN 47401

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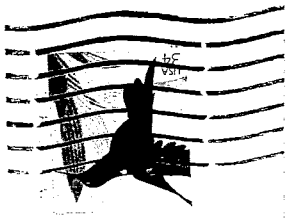

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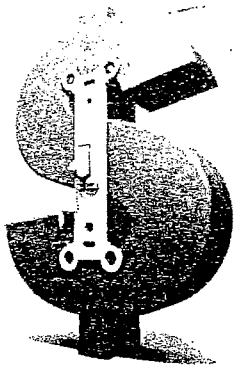
Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!



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Catly Gott
4900 So. Rogers
Bloomington, In. 47403

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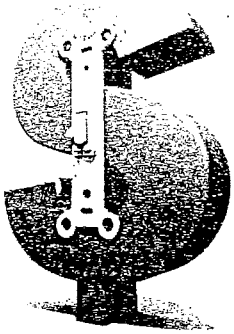

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Cheryl Green
653 Walnut St
Franklin IN 46131

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Indiana Utility Regulatory Commission
Attn: Beth Kroger Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's

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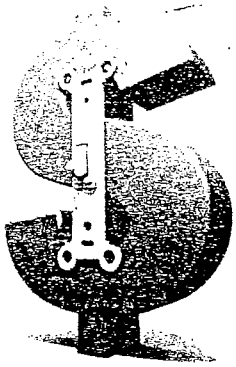

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Carol Langlin
4515 N Delaware
Indpls IN 46205

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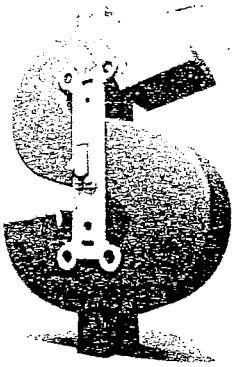

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INDIANA UTILITY
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Charles Leganza
2009 E Viva Dr
Bloomington 47401

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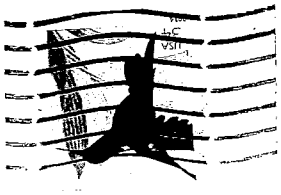

Indiana Utility Regulatory Commission
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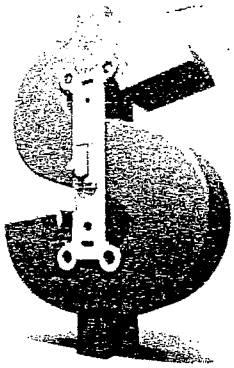

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Charlie McDonald
4554 N. Delaware
Indianapolis IN 46205

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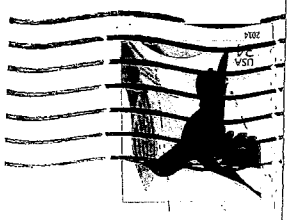

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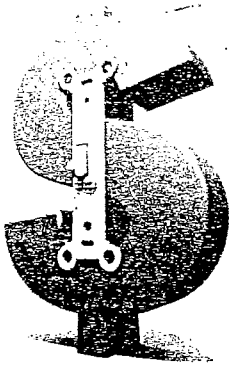

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Carol Orbison
138 E. 48th St
Indpls, IN 46205

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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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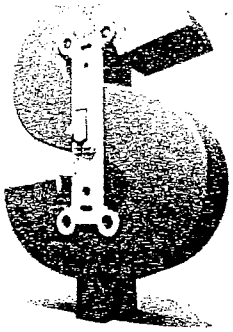

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INDIANA UTILITY
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C.A. Tasich
220 Herriott St.
Franklin, IN 46131

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Indianapolis, IN 46204

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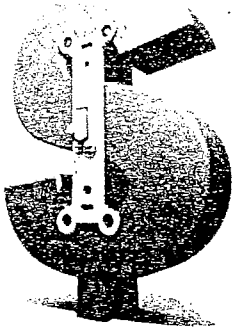

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Craig Peck
200 Herriott St
Franklin, Ste 46131

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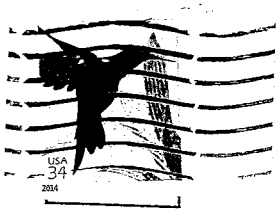

Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

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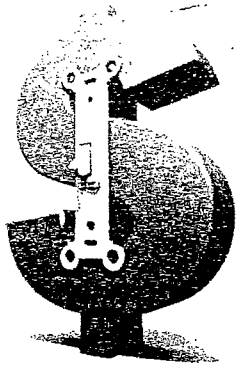

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Doris Clay
P.O. Box 65
Clear Creek, In 47426

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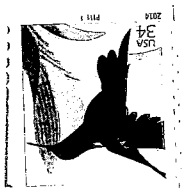

Indiana Utility Regulatory Commission
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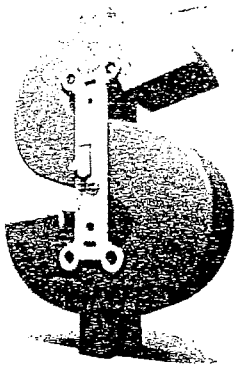

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Dorothy L. Gerne
4436 N. Pennsylvania
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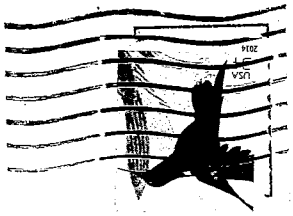

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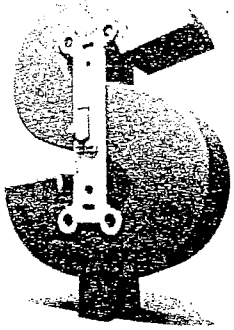

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Dale R. Hall JR
4820 S Rogers St
Bloomington, IN 47403

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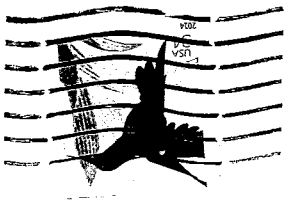

Indiana Utility Regulatory Commission
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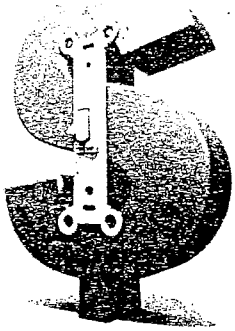
Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!



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D.W. Holbrook
795 E Rhoner Rd
Bloomington, IN 47401

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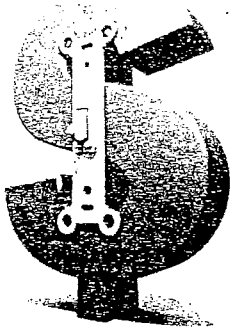

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D. Singer
4822 Washington Bl.
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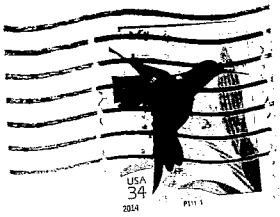

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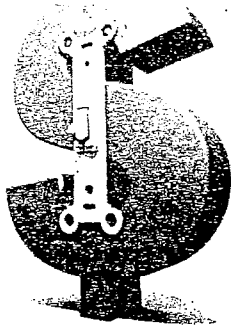

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Elizabeth Busey
4324 E. Beacon Ct
Bloomington IN 47408

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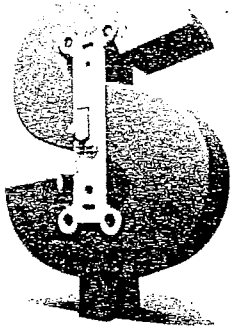

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Elizabeth Johnson
4408 E. Stephens Dr.
Bloomington, IN 47408

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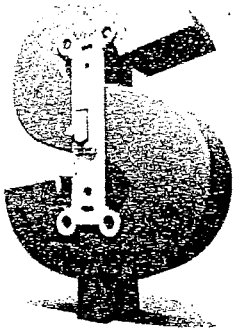

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E. Pierre
529 E. Holland Pr.
Bloomington, IN 47401

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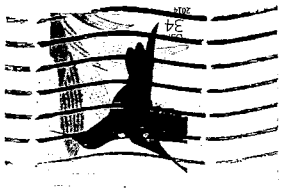

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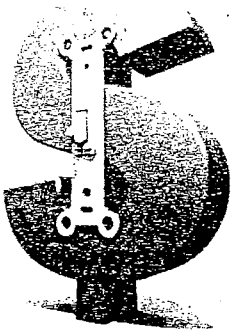

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Erica M Seifert
645 E Holland Dr #
Bloomington, IN 47401

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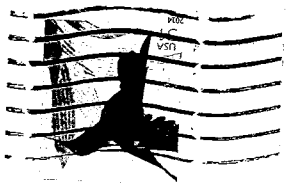

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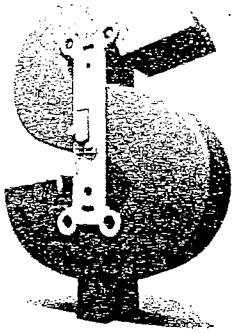

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Emily Walwood
4420 N. Pennsylvania
Indianapolis IN 46205

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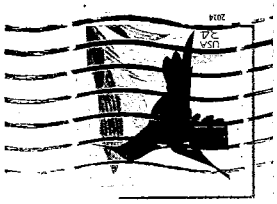

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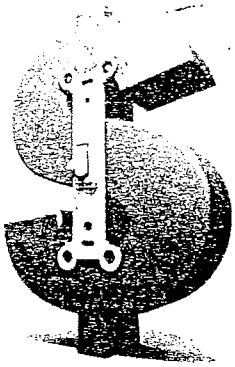

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Gary L. Minardo
155 N. Howard RD
Greenwood, Ind. 46142

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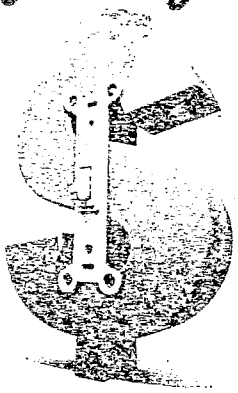

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Homer Brown
4850 No 0th St
Bloomington In 47404

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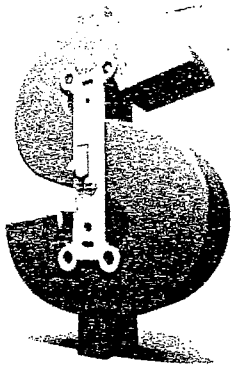
Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!



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Haley Gilly
4462 N Delaware St
Indy, IN 46205

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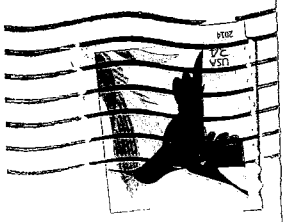

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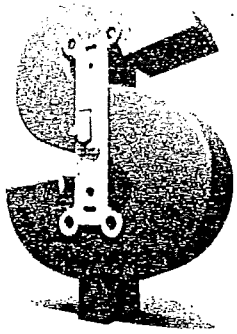

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Heather Utterback
3630 E. Morningside Dr.
Bloomington, IN 47408

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Indianapolis, IN 46204

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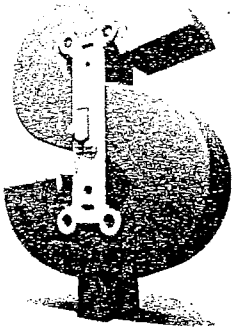

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Ismail Tezer
3500 E. Park Ln.
Bloomington IN 47408

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Indianapolis, IN 46204

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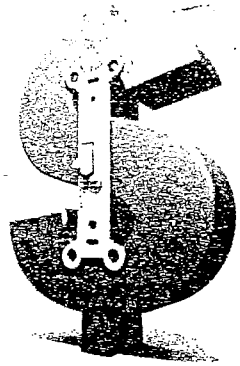

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Joanne Agostino
4466 Central Ave
Indpls IN 46205

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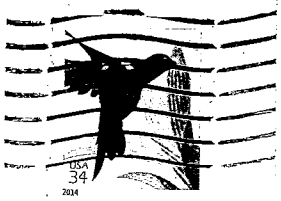

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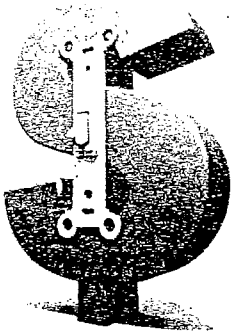

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Jill Andrews
521 N. Staats Dr
Bloomington IN
47408

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Indianapolis, IN 46204

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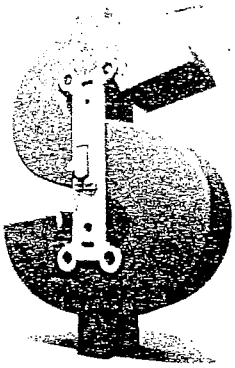

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Janice Anesa
3614 Post
Bloomington IN 47408

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Indianapolis, IN 46204

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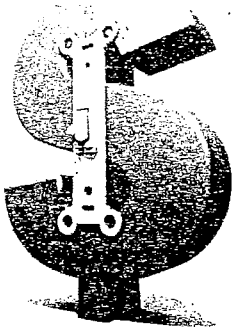

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Jim Brining
4606 Wash. Blvd
Indpls, IN 46205

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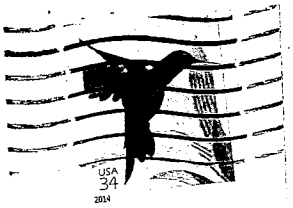

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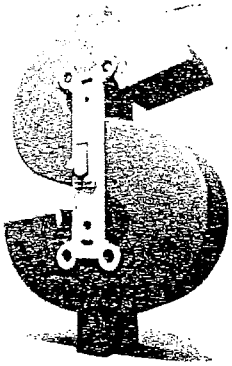

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Ashli Bentley
4949 S. Rogers St
Bloomington, IN 47403

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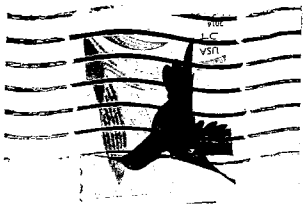

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Indianapolis, IN 46204

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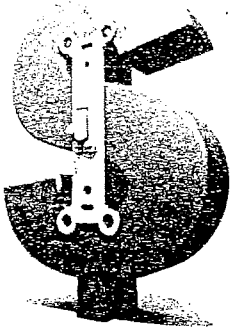

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Judee Butcher
660 N. Meadowlark Lane
Bloomington, IN 47408

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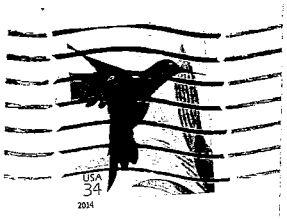

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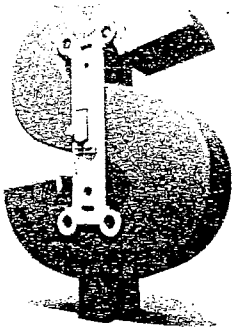

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Josh Copeland
791 Kensington Park Road
Greenwood IN 46124

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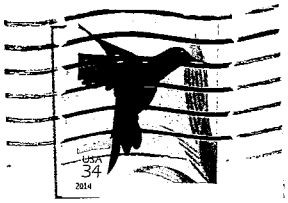

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Indianapolis, IN 46204

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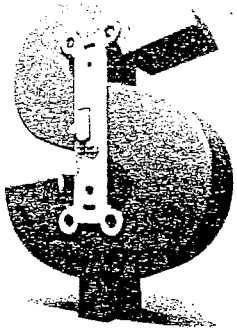

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Jack Ensley
3619 Morningside
Dr. 47404

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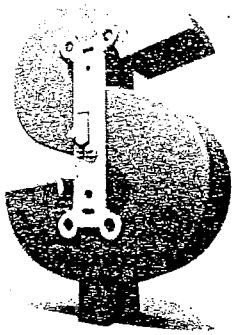

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Judith R. Andrews
4949 E. Ridgewood
Bloomington, Ind
47401

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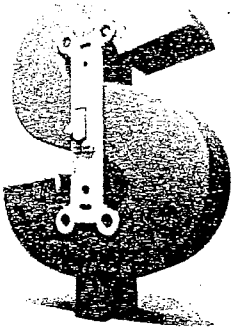

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Jim Kepliner
4307 E Weymouth
Bloomington, IN 47408

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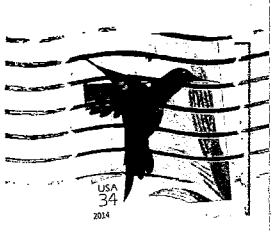

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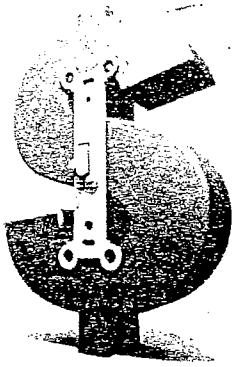

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Jordan Korth
710 E. holland d
Bloomington, IN 47401

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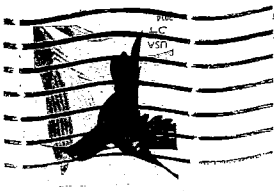

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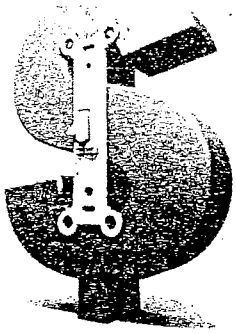

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Jordan Maxedon
5201. S. Rogers St
Bloomington, IN. 47403

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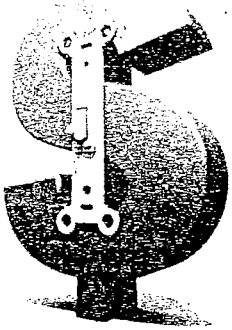

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Julie McNamar
4454 Central Ave.
Indls, IN 46205

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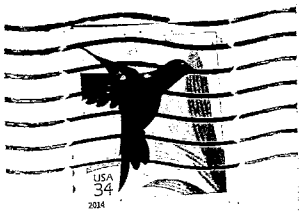

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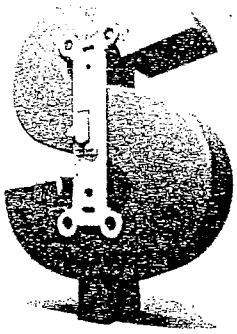

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smile
Mr. Jeffrey Morris
601 N Staats Dr.
Bloomington, IN 47408

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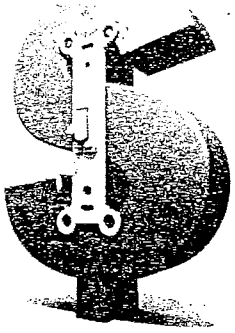

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Janet L. Orth
4425 Central
Indianapolis IN
46205

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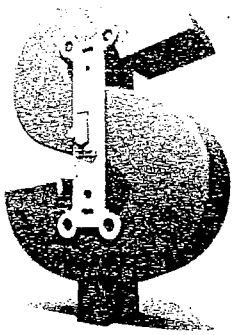

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Jeanne Perry
200 Harriott St.
Franklin, IN 46131

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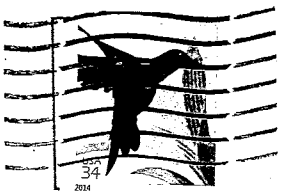

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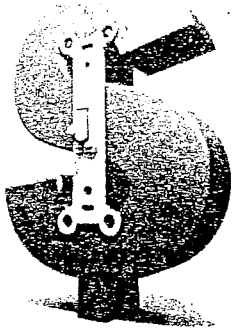

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Jacob Sowder
5050 S. Old S.R. 37
Bloomington, IN 47401

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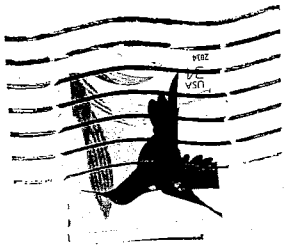

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Indianapolis, IN 46204

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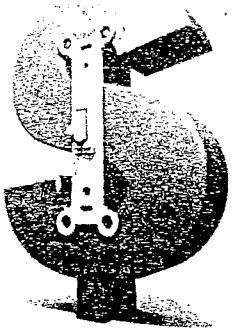

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Jacob Summers
3502 E Andrews Dr
Bloomington IN 47408

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Regarding the IURC's EE/DSM recommendations, please recommend to Gov. Pence that Indiana enact strong statewide energy efficiency policy that establishes:

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's

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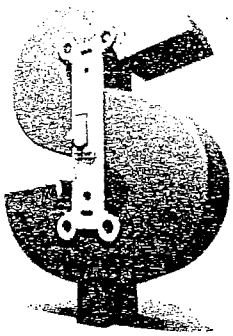

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Judy Surzycki
4310 Wembley Ct
Bloomington, IN 47408

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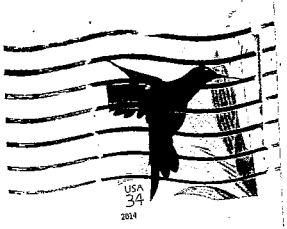

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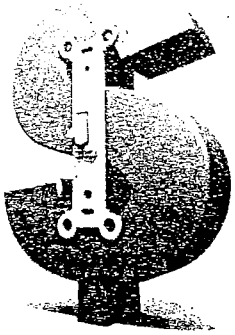

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Jennifer Thompson
589 Graham st
Franklin IN 46131

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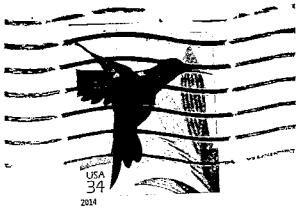

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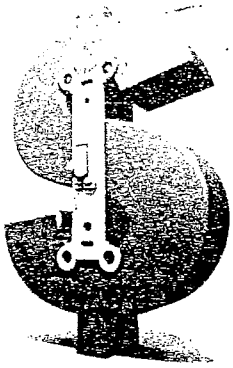

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Don Pitts
3607 E. Hollywood Dr
Bloomington In 47408

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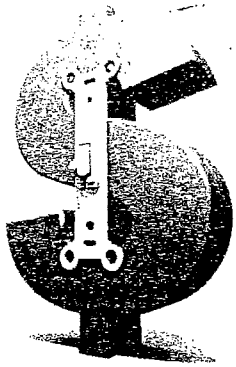

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K Bowers
39 Meridian Pl
Indpls, IN 46205

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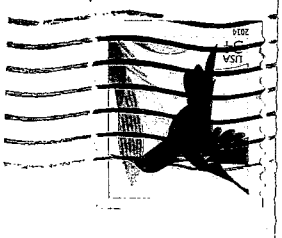

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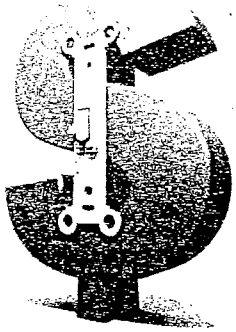

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Kenneth Buzzard
4155 S Derby Dr
Bloomington, IN 47401-8347

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

June 2, 2014

General Counsel Beth Krogel Roads
Indiana Utility Regulatory Commission
101 West Washington Street, Ste. 1500 E
Indianapolis, IN 46204

RECEIVED
JUN 06 2014
INDIANA UTILITY
REGULATORY COMMISSION

Ms. Kristy Cooper, BS CPhT
349 Jackson Avenue
Peru, IN 46970
klooper11@hotmail.com
765-244-1379

Re: IURC's EE/DSM Recommendations

Dear IURC,

I live in Peru, IN in Miami County. My Electric Service provider is Peru Utilities. I have received utility assistance for both my heat and electric for the last two years. I've applied for it in previous years, but been turned down because funds were exhausted by the time I learned of the program. I was discriminatorily fired from my employment with IU Health Arnett in 2010. They damaged my ability to work from a job site accident and through the firing. The Utility Assistance I received through my local Area Five Agency was the only reason I had heat and electricity during this 4 year ordeal.

I'm back to work nearly full time now and probably will not need the program this year. But I know there are many disabled, elderly and low income individuals in Miami County who do need the Utility Assistance Program and will suffer if it is not renewed.

I would also like to express my concern about the billing practices of Peru Utilities. In April, while making a payment, a cashier mentioned that I was still being charged for a security light that was removed 5+ years ago from my property. The $5/month fee calculates to an approximately $300 overcharge. The cashier stated that Peru Utilities could only credit my account for 1 year, because their system doesn't allow for a multi-year credit. I had no way of knowing this charge was accruing because their billing is not itemized or harmonized with their accounting screens. In other words, the charge did not appear on my bill for the last 5 years.

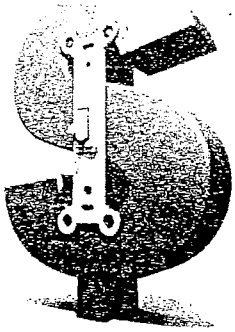
I would like to see more legislation to protect utility consumers from this type of billing fraud. I say fraud, because I have heard from other residents who've been double billed for trash service (on the utility bill along with water & sewage) for both their home and garage on the same address. This person in particular was told that they would be given no credit for the overcharge because 45 days had elapsed since the billing error.

Sincerely,

Kristy Cooper

Kristy Cooper, BS CPhT

Reinstate Indiana's Energy Efficiency Programs!



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Kari Drake
769 E. Holland Dr.
Blmgtn IN 47408

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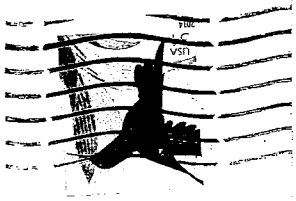

Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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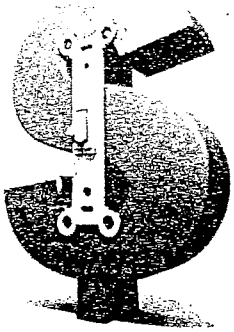

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K. Marks
143 Herriott St
Franklin, IN 46131

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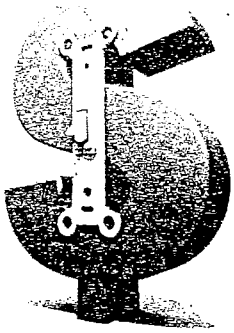

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Keith A Morris
501 Johnson Ave
Franklin IN 46131

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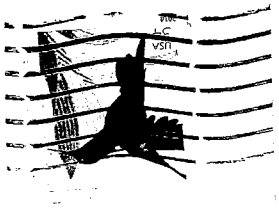

Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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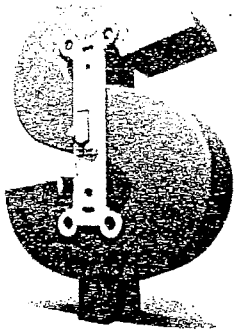

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Kevin Pierce
489 Johnson Ave
Franklin Ind 46131

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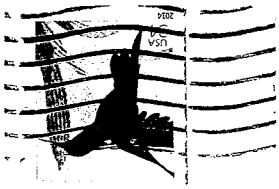

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Indianapolis, IN 46204

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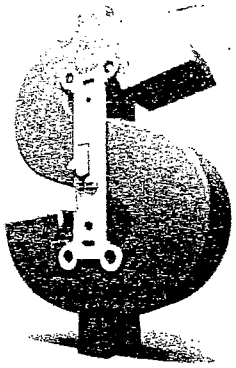

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KARLA SCHELLER
806 BERKLEY RD
INDPLS IN 46208

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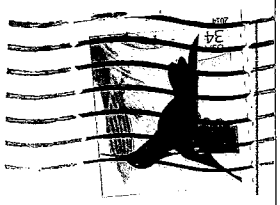

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Indiana Utility Regulatory Commission
Attn: Beth Kroger Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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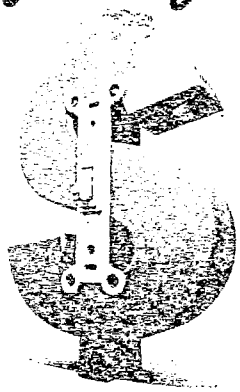

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Kathy Taber
4630 N. October Dr.
Bloomington, IN 47404

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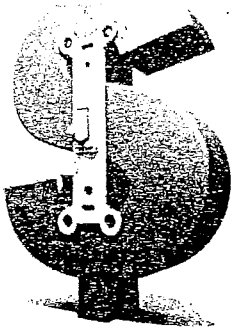

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K. Waite
331 W Persimmon Ct.
Bloomington, IN 47403

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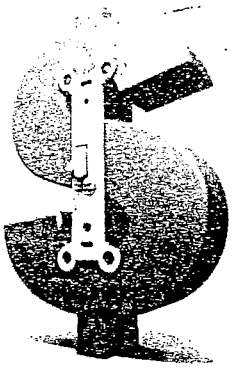

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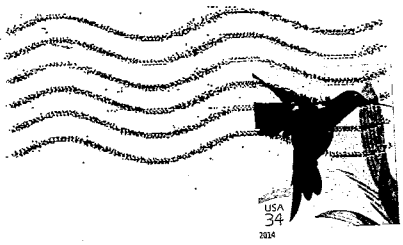
Lori Meyers
1071 Elm St
Greenwood, IN 46142



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Indianapolis, IN 46204

76499

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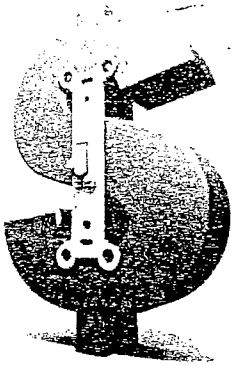

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L.R. OConnor
4451 Central
Indpls IN 46205

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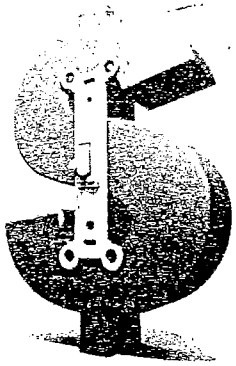

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LINDA SHOWALTER
1056 LAWNDALE CT
GREENWOOD IN, 46142

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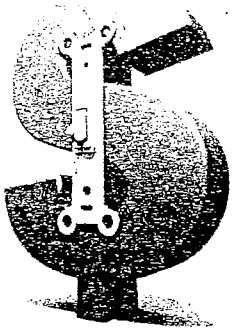

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Lisa Williams
525 N. Grandview
Bloomington IN 47408

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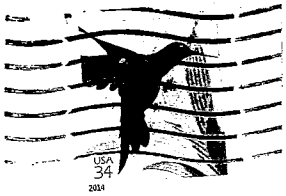

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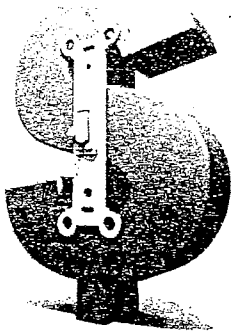

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Matt Callison
665 N. Meadowlark LN
Bloomington, IN 47408

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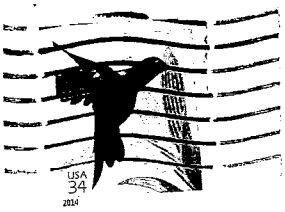

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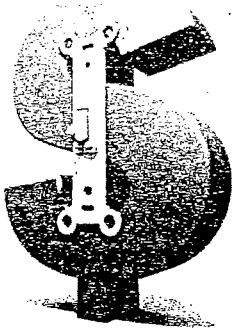

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Mike Hammel
699 YANDES ST
FRANKLIN, IN. 46131

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Indianapolis, IN 46204

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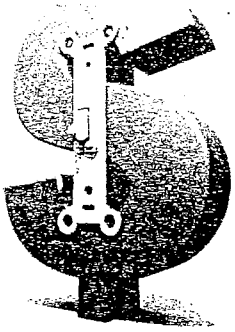

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Marissa Moorman
612 N. Kenny Dr.
Bloomington, IN 47408

Regarding the IURC's EE/DSM recommendations, please recommend to Gov. Pence that Indiana enact strong statewide energy efficiency policy that establishes:

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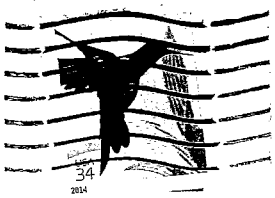
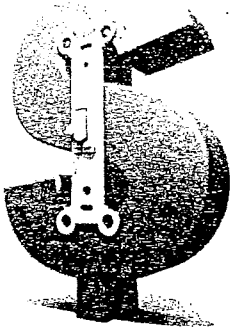


Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!



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Michael Shanton
5854 Primrose
Ave Indianapolis
46220

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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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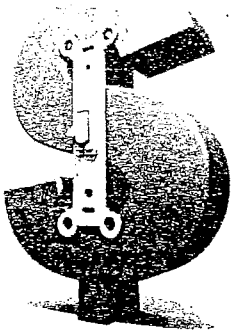

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Michael Wilson
141 Clive Ave
Franklin, IN 46131

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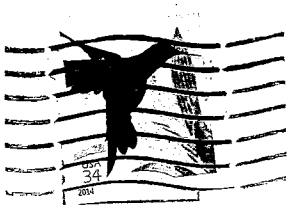

Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
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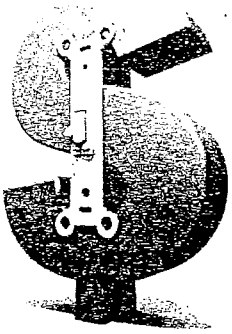

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NICK LIGHTFOOT
543 N. PARK RIDGE RD
BLOOMINGTON, IN 47408

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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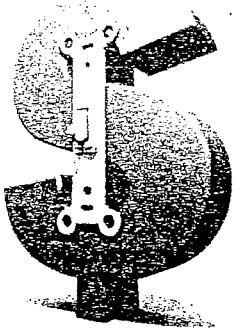

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Nick Crisolli
600 Walnut St
Franklin, IN 46131

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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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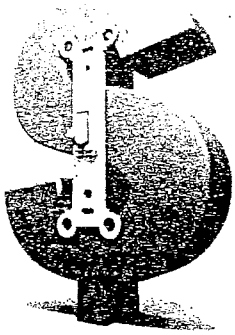

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Mr. & Mrs. Peter Grossman
4410 N Pennsylvania St
Indianapolis, IN 46205-1728

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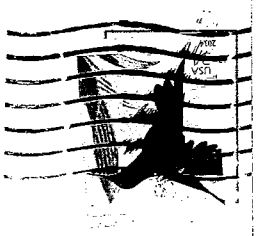

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Indiana Utility Regulatory Commission
Attn: Beth Kroger Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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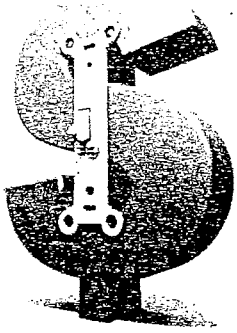

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Rebecca Adams
4517 Central Ave
Indpls. IN. 46205

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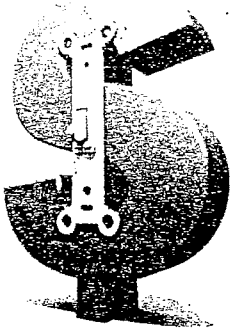

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Rob Cox
5101 S Rogers St.
Bloomington IN, 47403

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Indiana Utility Regulatory Commission
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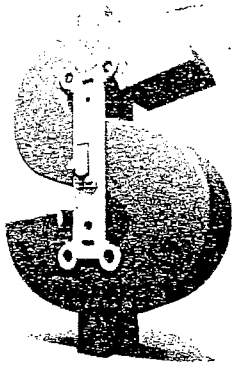

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R. Cronin
5656 Ralston Ave
Indpls, IN 46220

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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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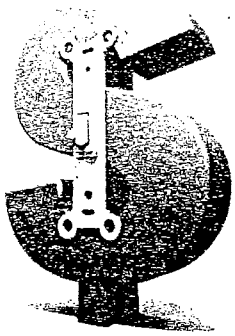

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Robert E Page
4830 S. Rogers St.
Bloomington IN 47403

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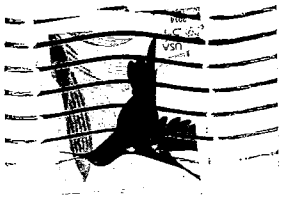

Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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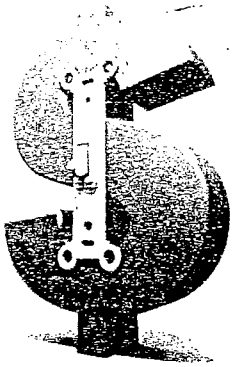

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Rose Sisco
4077 Walnut St.
Bloom. Ind.

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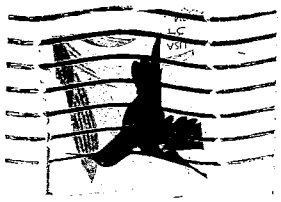

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Indiana Utility Regulatory Commission
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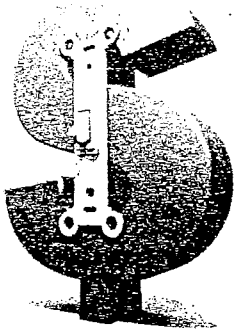

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Shane Abbott
305 W Clear Creek Dr
Bloomington IN 47403

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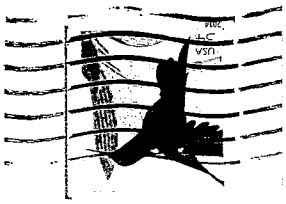

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Indianapolis, IN 46204

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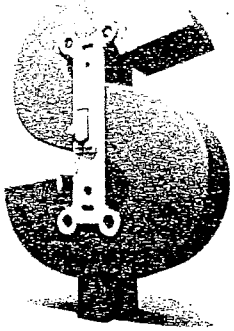

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S. Beauregard
4155 S. Walnut St. Pike
Bloomington, IN 47401

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

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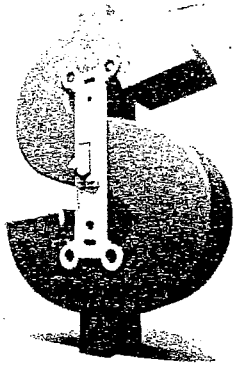

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STACY BROWN
5333 S. WHITE PINE DR
Bloomington IN 47403

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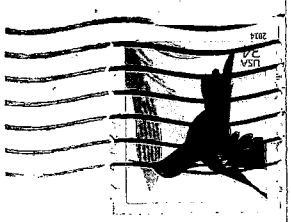

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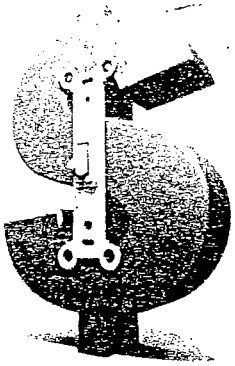

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Steven Cornwell
657 N. Meadowlark Ln.
Bloomington, IN 47408

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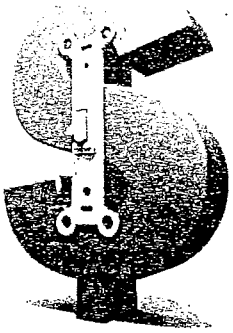

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Sue Crawford
4802 Old St Rd 37
Bloomington, IN

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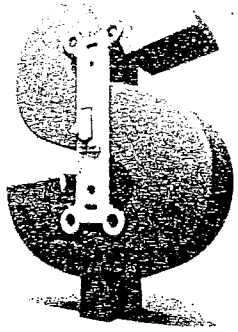

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Scott Schmitt
4456 Central Ave
Indpls IN 46205

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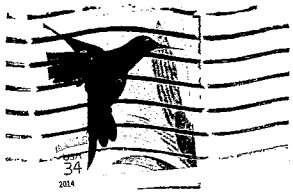

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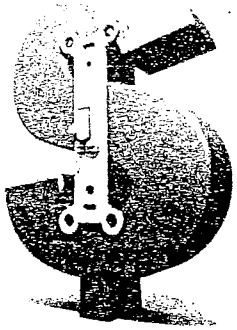

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Scott Wilkerson
133 Oliver Ave
Franklin, IN 46131

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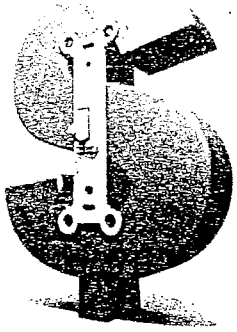

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5545 Primrose Ave
Indpls, IN 46220

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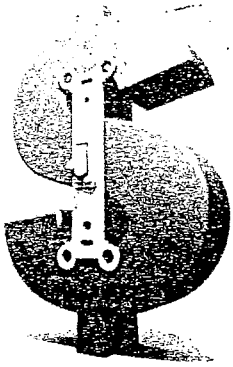

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Todd + Tracey Thorsen
127 N Concord Rd
Bloomington, IN 47408

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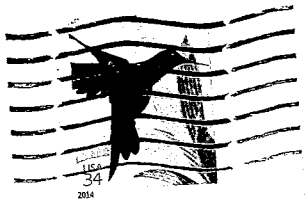

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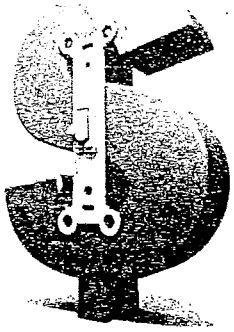

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Terry Peacock
154 Kensington Pk Rd
Greenwood, In.
46142

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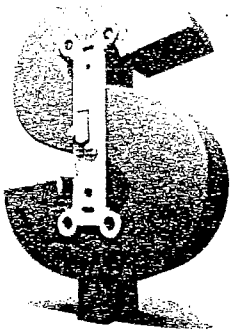
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

INDIANAPOLIS IN 462
3 JUN 2014
PM

Reinstate Indiana's

Energy Efficiency Programs!



RECEIVED
JUN 05 2014
INDIANA UTILITY
REGULATORY COMMISSION

TOM SHAFER
915 N. PLYMOUTH CT
BLOOMINGTON, IN 47408

Regarding the IURC's EE/DSM recommendations, please recommend to Gov. Pence that Indiana enact strong statewide energy efficiency policy that establishes:

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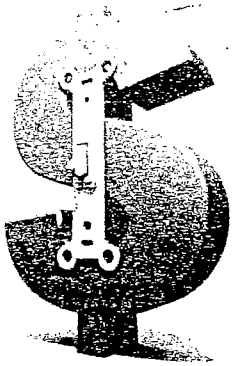
Indiana Utility Regulatory Commission
Attn: Beth Kroger Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!



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TAD Anderson
910 PROSPECT ST
INDIANAPOLIS, IN 46203

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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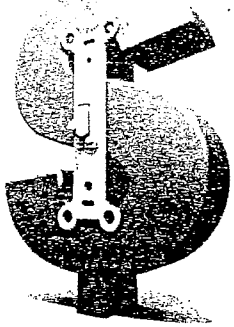

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WILLIAM SNAPP
3643 E. PARK LN.
BLOOMINGTON, IN. 47408

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Indianapolis, IN 46204

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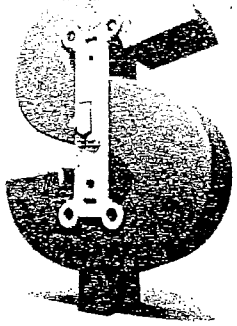

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REGULATORY COMMISSION

Zach DeWitt
654 Walnut St.
Franklin, IN 46131

INDIANAPOLIS IN 462
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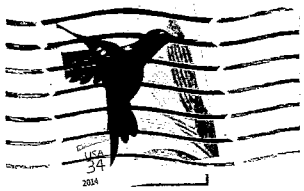
3 JUN
2014



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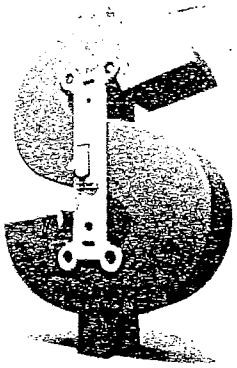

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INDIANA UTILITY
REGULATORY COMMISSION

Calesha Zwiebel
4802 S. Old St Rd 37 Apt 1
Bloomington IN 47401

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INDIANAPOLIS IN 462
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3 JUN
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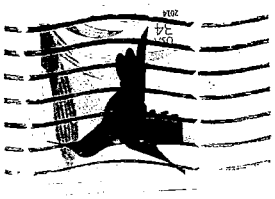

Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

Reinstate Indiana's

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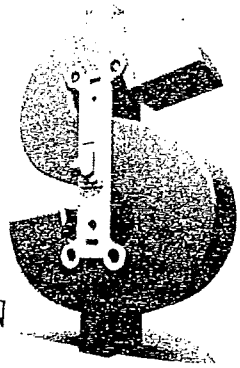
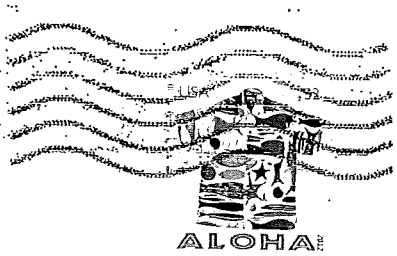


Aaron Beach
5630 Crittenden Ave
Indianapolis, IN 46220

2014 MAY 30 PM 5 1



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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Indiana Utility Regulatory Commision, June 3, 2014

Please recommend to Governer Pence that Indiana enact strong statewide energy efficiency policy that estatilishes these things. Statewide savings goal similar to those estalilished in the December 2009 order in Cause number 42693. A public purpose fund that all ratepayers contribute to. Also an independent, non profit Statewide third party administrator to oversee those funds. Energy efficiency programs create jobs here in Indiana. Indiana needs more opperteunlyes for employment. I looked for a job for 6 months until I finally found a job. In the meantime I had to relay on finical assistance from the Government. When I seriously want to work and not relay on government programs to get by.

Thank You
Amy Kochillatra

Reinstate Indiana's

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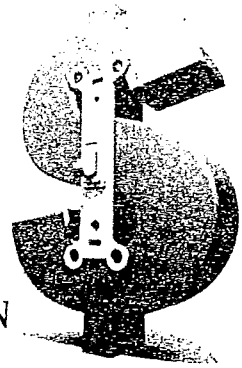
INDIANA UTILITY
REGULATORY COMMISSION



Betty L Seipel

INDIANAPOLIS IN 460

30 MAY 2014 PM 1 1

Ms. Betty L. Seipel
5629 Crittenden Ave.
Indianapolis, IN 46220-3401

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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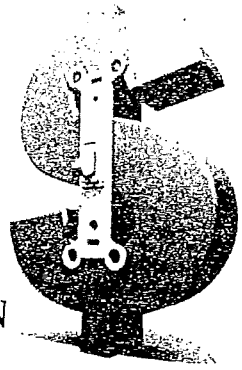

Bill Growdon
6834 Ralston Ave
Indianapolis, IN

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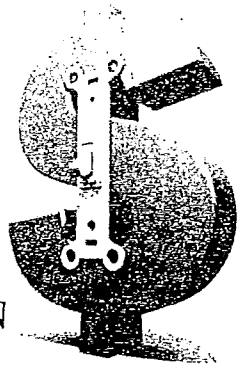
Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!



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JUN 02 2014

INDIANA UTILITY
REGULATORY COMMISSION

INDIANAPOLIS IN 460
30 MAY 2014 PM 2 L

Christi Barber
5733 Crittenden Ave
Indianapolis, IN 46220

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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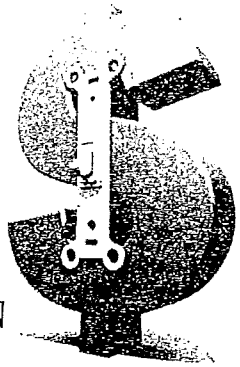
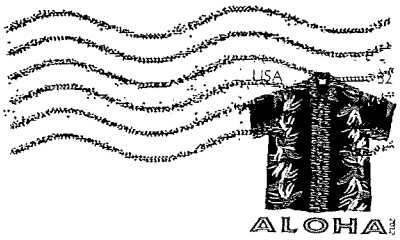


D. Moreland
4823 Central Av
Indianapolis, IN 46205

INDIANAPOLIS IN 460
2014 PM 1 1



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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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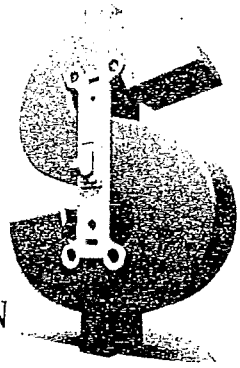
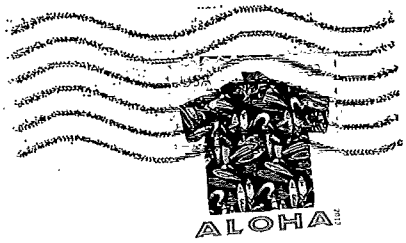
REGULATORY COMMISSION



Eric Olimb
5752 Cr. Harden Ave
Indianapolis IN 46820



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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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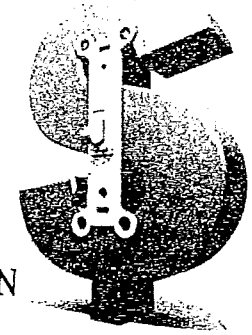

Georg INDIANAPOLIS IN 460

135 E. 46 MAY 2014 PM 1 L

Indianapolis, IN 46205

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Indiana Utility Regulatory Commission

Attn: Beth Krogel Roads

101 West Washington St., Ste 1500E

Indianapolis, IN 46204

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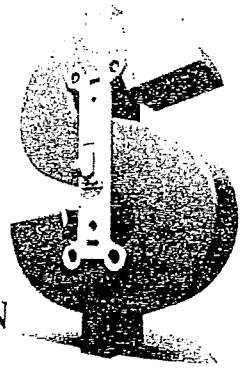
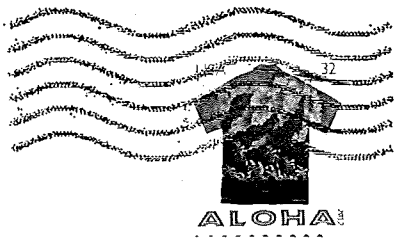


JOAN WRISTEN
5722 RALSTON AVE
INPLS, IN 46220

INDIANAPOLIS IN 450
2014 PM 1.1



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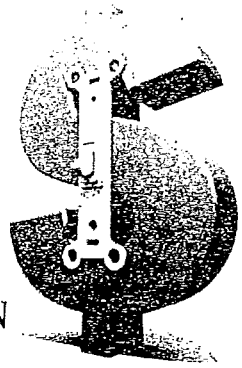
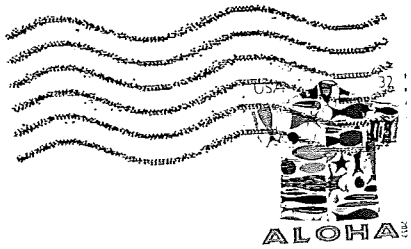


KRISTEN STAMPER
809 N. PLYMOUTH RD
BLOOMINGTON, IN 47408

INDIANAPOLIS IN 460
20 MAY 2014 PM 1 L



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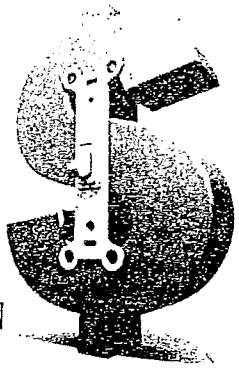
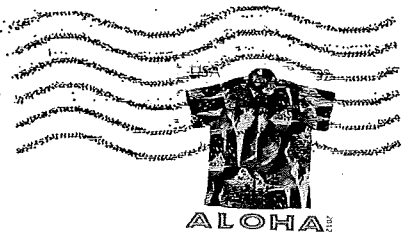


Matt Gregoire
5832 Ralston Ave.
Indianapolis, IN 46220

INDIANAPOLIS IN 460
30 MAY 2014 PM 3 L



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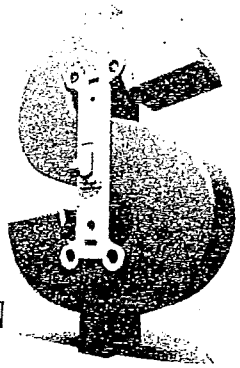
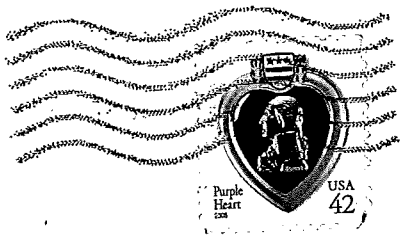


Mike Hallen
4411 S. College Dr
Bloomington IN 47403



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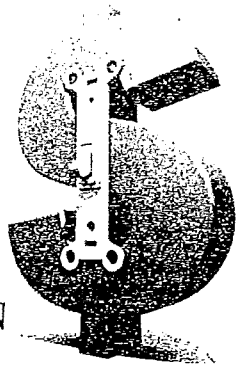
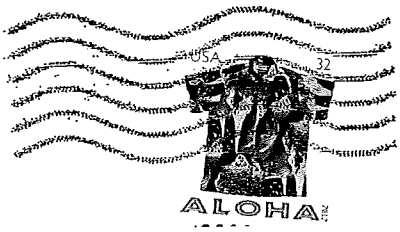


Maggie
5733 Crittenden Ave
Indpls IN 46220

INDIANAPOLIS IN 460
2014 PM 1 L



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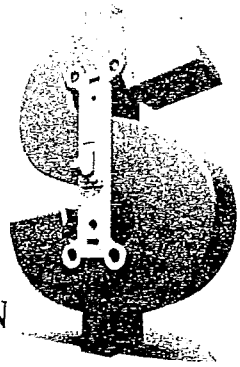

M. Koche
5620 Crittenden Ave.
Indpls. IN 46220

INDIANAPOLIS IN 460
MAY 2014 PM 1 L

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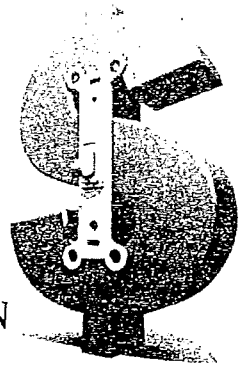

Nancy D. L[illegible]
4601 S. Co[illegible] D[illegible]
Bloomington, IN. 47403

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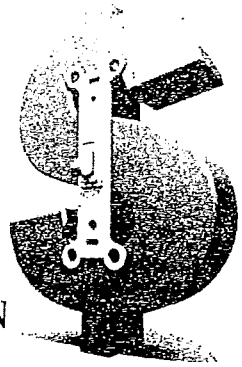

PARVEL BLANK
5755 PRIMROSE AVE.
INDPLS, IN 46220

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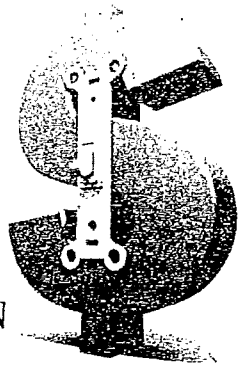
INDIANA UTILITY
REGULATORY COMMISSION



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BLOOMINGTON, IN 47408

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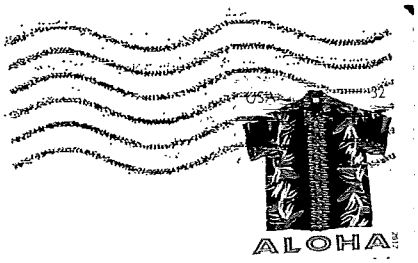

Regarding the IURC's EE/DSM recommendations, please recommend to Gov. Pence that Indiana enact strong statewide energy efficiency policy that establishes:

1. Statewide savings goal similar to those established in the December 2009 order in Cause No. 42693.
2. A public purpose fund which ALL ratepayers contribute to.
3. An independent, non-profit Statewide third party administrator to oversee those funds.

Indiana Utility Regulatory Commission

Attn: Beth Krogel Roads

101 West Washington St., Ste 1500E

Indianapolis, IN 46204

Reinstate Indiana's

Energy Efficiency Programs!

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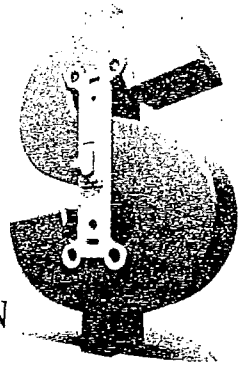
JUN 02 2014

INDIANA UTILITY
REGULATORY COMMISSION



R Nicholson
5842 Primrose
In In 46220

INDIANAPOLIS IN 460
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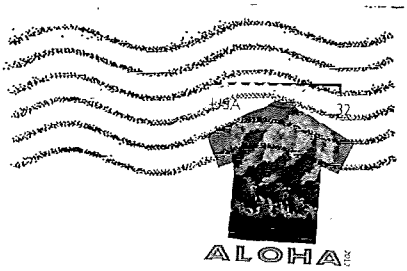

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!

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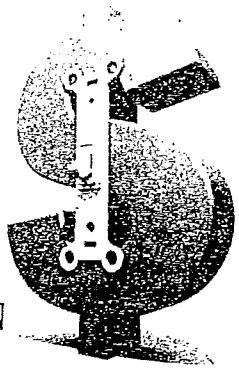

Rebecca Rivas
4555 Gov Max Pl
Indianapolis IN
46205

INDIANAPOLIS IN 460
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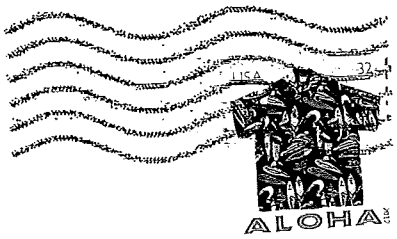

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

Reinstate Indiana's

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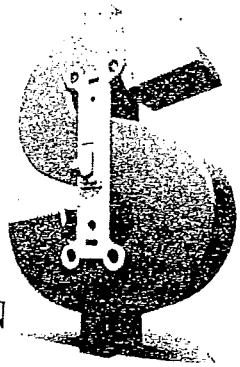
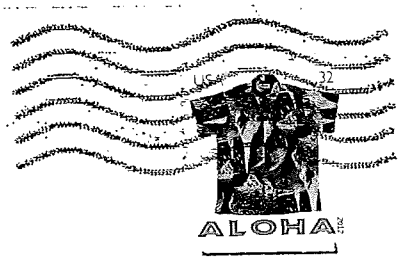
INDIANA UTILITY
REGULATORY COMMISSION



Shawn McAbee
5625 Crittenden Ave.
Indianapolis IN 46220

INDIANAPOLIS IN 460
MAY 2014 PM 11



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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

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Reinstate Indiana's

Energy Efficiency Programs!

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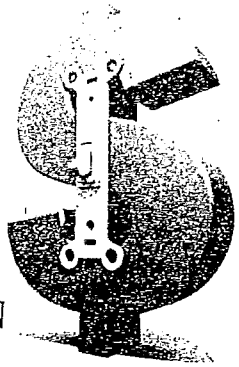
INDIANA UTILITY
REGULATORY COMMISSION



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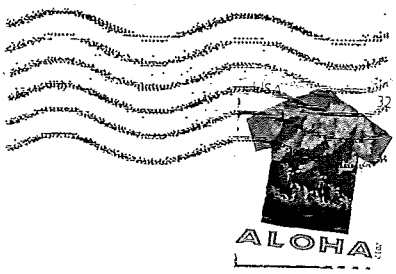

Tom Betley
324 E 45th St
Indpls, IN 46205

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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
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Indianapolis, IN 46204

Reinstate Indiana's Energy Efficiency Programs!

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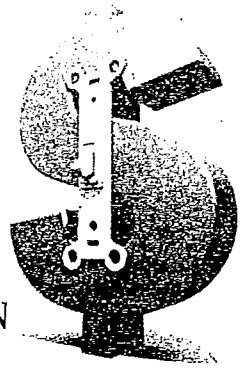
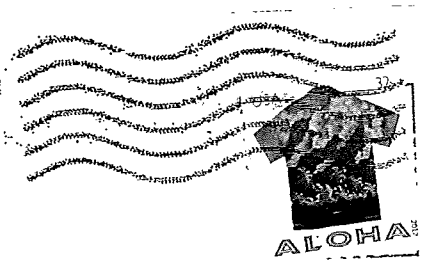


Tom Grissmer

5751 [illegible]

Indy 46220



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Indiana Utility Regulatory Commission
Attn: Beth Krogel Roads
101 West Washington St., Ste 1500E
Indianapolis, IN 46204

Layton, Kimberly

From: Jacquie Hilterman [hilterwoman@gmail.com]
Sent: Monday, June 02, 2014 3:46 PM
To: Comments, Urc
Subject: IURC's EE/DSM Recommendations

General Counsel Beth Krogel Roads:

- Indiana NEEDS an Energy Efficiency Standard and our original goal from 2009 is aggressive, but achievable. Our neighboring states are way ahead of us – Illinois has a goal of 2% energy reduction by 2015 and Ohio has a goal of 2% by 2019.
- We want to make Indiana an attractive state for business by having low energy costs, but what about sustainability, air quality and water quality? These items attract good workers, families and businesses to Indiana.
- The Senate opted to eliminate energy efficiency programs because of cost; however, it is much cheaper to save a kilowatt than it is to figure out how to produce 1,500 more megawatts.
- Any opt-outs for large electricity consumers must be fair and have other energy efficiency requirements associated with their ability to opt-out.
- Read the Citizens Action Coalition to Speak Out to Help Reinstate Indiana's Energy Efficiency Programs!

It's not just about the cost, it's about the cost to our future generations!

Sincerely,

jacquie Hilterman

Jacquie Hilterman
17241 Joliet Road
Westfield, IN 46074

Layton, Kimberly

From: Jeff Helm [jhelm@yocinc.org]
Sent: Tuesday, June 03, 2014 5:04 PM
To: Comments, Urc
Attachments: IURC_Public_Comment.pdf

Ms. Roads:

Please accept the attached recommendation for consideration. Youth Opportunity Center submits this document in response to IURC's request for public comments on DSM and EE policies and programs.

Respectfully,

Jeff Helm
Director of Information Technology and Facilities
Youth Opportunity Center, Inc.
3700 W. Kilgore Avenue
Muncie, IN 47304
(765) 289-5437 ext. 2213

http://www.linkedin.com/in/jlhelm

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YOUTH OPPORTUNITY CENTER INCORPORATED

The Youth Opportunity Center, Inc. (YOC) proposes that a 50% tax credit be made available to donors who contribute money to a qualified not-for-profit Indiana agency that will use that money to invest in energy efficiency (EE) projects.

Indiana tax filers contributing to eligible Indiana colleges or universities are allowed a credit of 50% of the contribution or $100 on a single ($200 on a jointly filed return), whichever is less. A corporation's credit is equal to 50% of the total amount given during the tax year, with credit caps set at the lesser of 10% of the tax liability or $1,000.[1]

YOC is committed to responsible stewardship of financial and environmental resources. A 2013 project to replace inefficient lighting fixtures in two of the Muncie campus's 18 buildings has reduced electrical use by 35% and 11% respectively, based on a six-month year-over year comparison. This project was made possible in part by an Energizing Indiana rebate program targeting inefficient fixtures. Smaller projects throughout campus include adopting best-practices such as installing motion-detecting light switches, upgrading HVAC programming control systems and variable-frequency drives, and adding insulation.

As a not-for-profit agency, YOC is supported in part by donors invested in the mission of serving at-risk juveniles. A tax credit as described above would be helpful in engaging donors and, in the case of many small donors, increasing the amount of their contributions.

The benefits of such a program include:

1. Decreased utility demand without additional fiscal or administrative burdens on utility providers.
2. Prompting and encouraging not-for-profit agencies to undertake EE projects. Existing donors may ask the organization about planned EE projects, their interest prompted by the tax credit.
3. Agencies would receive an on-going economic benefit through reduced monthly operational costs.
4. Projects undertaken would involve Indiana skilled trades such as electricians, plumbers, roofers, HVAC, and others. This would stimulate work and economic activity throughout the state.

Respectfully Submitted,

Jeff Helm
Director of IT & Facilities

[1] State of Indiana. Department of Revenue. (January 2003) Information Bulletin #14. Income Tax. http://www.in.gov/dor/reference/files/ib14.pdf

3700 W. Kilgore Ave.
Muncie, IN 47304
765.289.5437
fax 765.741.5269
www.yocinc.org

Layton, Kimberly

From: Michelle Payne [tmmcpayne@myfairpoint.net]
Sent: Wednesday, June 04, 2014 1:47 PM
To: Comments, Urc
Subject: Energizing Indiana

In just the few weeks since Gov. Pence decided to end the Energizing Indiana program, even more reports have come out showing the relationship between ignoring the effect of our energy choices and global climate change.
We MUST continue to do our part as a state to reduce the carbon emissions from our state and continue to make all Hoosiers more aware of what they can do as individuals and communities to contribute to the solution instead of continuing to add to the problem.
Please reinstate this valuable program.
Remember that not all companies are looking to locate in places with the lowest energy costs. Many are looking for quality of life for their employees. Indiana can attract more businesses with progressive energy initiative, clean air and water.
Michelle Payne

Layton, Kimberly

From: johnj.morgan@comcast.net
Sent: Wednesday, June 04, 2014 2:22 PM
To: Comments, Urc
Subject: Reinstate the energy efficiency program

While I signed a petition in support of this position, I want to expand my comments to emphasize that we should look at improving the program, not just continue it as is. There is also an important codicil: During the energy "crisis" of the 1970s and early 80s, the people of Indiana enthusiastically and successfully embraced energy saving measures. Our reward was that the electric providers asked for and got a rate increase due to the reduced energy consumption resulting in reduced profits.
To get consumer buy-in for such programs, we really need a guarantee that we will not get punished for success by new rate increases.
I would also like to see protection for individual ratepayers against being used to pay for huge discounts to corporate entities. (e.g. when Wishard Hospital agreed to have Citizens Gas install a huge gas-fired generator to provide the hospital's electricity, IPL agreed to a huge rate cut to keep them as a customer, then turned around and got a major rate increase from private citizens.

John J. Morgan

2340 S Audubon Road
Indianapolis, IN 46203
317-755-3926

johnj.morgan@comcast.net

Layton, Kimberly

From: David Parsons [dashparsons@bluemarble.net]
Sent: Wednesday, June 04, 2014 3:29 PM
To: Comments, Urc
Subject: IURC Recommendations for EE and DSM legislation

IURC members,

Increasing energy efficiency is widely recognized as one of the most cost effective long lasting methods to reduce energy costs for any user of energy whether residential, municipal or commercial. It also reduces the need for expansion of generating capacity, saving all consumers money. As we enter the era of switching from burning high carbon coal to other sources of power, increasing energy efficiency will be a key component of reducing carbon emissions.

I urge you to recommend strong, widely based energy efficiency programs that will create the conditions for an efficient power production and consumption system.

David N. Parsons
8779 S Rockport Rd
Bloomington, IN 47403-9163

Layton, Kimberly

From: Ned & Marie GeiserHarnish [geiser.harnish@sbcglobal.net]
Sent: Wednesday, June 04, 2014 5:55 PM
To: Comments, Urc
Subject: Energy Efficiency

Dear IURC,

I participated in IPL's Energy Efficient home inspection in the past several years. From this inspection, I reduced my energy usage considerably, including installing a 95% efficient heater. Please, please continue to fund this service for Indiana as we continue to reduce energy use for the next 7 generations.

Thank you,

Sincerely,

Marie Harnish
5141 Lancelot Drive
Indianapolis, IN 46228

Layton, Kimberly

From: sheilamarie [sheilamarie@benedictine.com]
Sent: Wednesday, June 04, 2014 9:34 PM
To: Comments, Urc
Subject: Energy Efficiency Efforts

To representatives at the IURC:

I find the arguments for stopping energy efficiency efforts to be rather short-sited. I cannot imagine why efforts to aid people in conserving energy hurt our economy. I can appreciate that large manufacturing businesses are energy intensive, and likely did share the burden of the cost in the Energizing Indiana program. But that does not mean that they are exempt from any effort to conserve. In fact, there is the most to gain here. And raising awareness with the citizens of the state can only aid in helping us, both fiscally and physically.

Reduced energy usage mean s better quality of life.
Reduced energy use means less demand on the utilities.
Reduced energy use means saving money.
And study after study shows that new innovations stimulate the economy.

It is smart to move on from the old, inefficient technologies such as incandescent and T12 bulbs. The new technology will never become mainstream without a little "activation energy". Human nature tends toward keeping the same old stuff, despite its inefficiency. The faster we can get over the hump, the better off we all will be.

Sheila Marie Fitzpatrick, OSB
Director of Facilities
Benedict Inn Retreat & Conference Center
317-788-781 ext. 2

Layton, Kimberly

From: teresa sullivan [mail@changemail.org]
Sent: Thursday, June 05, 2014 9:33 AM
To: Comments, Urc
Subject: 100 new signers: teresa sullivan, Margo Axelson...

Another 100 people added their names to Citizens Action Coalition's petition "Indiana Utility Regulatory Commission: Recommend to Gov. Pence that Indiana enact strong statewide energy efficiency policy!" -- momentum is growing.

There are now 1199 signatures on this petition. Read reasons why people are signing, and respond to Citizens Action Coalition by clicking here:
http://www.change.org/petitions/indiana-utility-regulatory-commission-recommend-to-gov-pence-that-indiana-enact-strong-statewide-energy-efficiency-policy/responses/new?response=64c4c0fa7692

Dear Indiana Utility Regulatory Commission,

Regarding the IURC's EE/DSM recommendations, please recommend to Gov. Pence that Indiana enact strong statewide energy efficiency policy that establishes: - Statewide savings goal similar to those established in the December 2009 order in Cause No. 42693. - A public purpose fund which ALL ratepayers contribute to. - An independent, non-profit Statewide third party administrator to oversee those funds.

Sincerely,

1200. teresa sullivan , United States
1199. Margo Axelson Murphy, North Carolina
1198. KEnneth Sanchez castro vallye, California
1197. Liv Biron Mansfield Center, Connecticut
1196. Mary Bates Indianapolis, Indiana
1195. Christine Lundberg Indianapolis, Indiana
1194. Rick Cook Ashley, Indiana
1193. Grant Smith Indianapolis, Indiana
1192. Devan Crume Kokomo, Indiana
1191. lebaron Montgomery Merrillville, Indiana
1190. concetta fallucca lanciano, Indiana
1189. Larry Alexander Muncie, Indiana
1188. Michael Wilson Indianapolis, Indiana
1187. Benjamin Tebbe Indianapolis, Indiana
1186. Cindy Walker Indianapolis, Indiana
1185. Adriana Tebbe Indianapolis, Indiana
1184. Beth Pickett Portland, Indiana
1183. Elizabeth Garber Indianapolis, Indiana
1181. Michael Rhees Clinton, Indiana
1179. Chuck Deppert Indianapolis, Indiana
1178. kenneth brock montpelier, Indiana
1177. raleigh sneed ward, Arkansas
1176. Brian ALano Bloomington, Indiana
1175. Loren Stumpner Bloomington, Indiana
1174. Edwin Paynter Bloomfield, Indiana

1173. Michele West Zionsville, Indiana
1172. Christopher Haynes Bloomington, Indiana
1171. Ben Smith Jacksonville, Florida
1170. Keith Davis Clinton, Indiana
1169. Neil Hudelson Indianapolis, Indiana
1168. Elmallah Kuluazeem Riverside, California
1166. maya carter evansville, Indiana
1165. Jeana Buck Evansville, Indiana
1164. Karisa Stojkovich Indianapolis, Indiana
1163. Renee Sweany Indianapolis, Indiana
1162. Brett Meyer wilton manors, Florida
1161. Jeana Martin White City, Oregon
1160. bret daugherty seymour, Indiana
1159. nicole rosenberger kenmore, Washington
1158. caroline iorio evansville, Indiana
1157. George Alvara Fresno, California
1156. Serrin Anderson Richmond, Indiana
1155. Leah Serb Richmond, California
1154. Susan Valiga Rockville, Maryland
1153. Wilma Hash sacramento, California
1152. Dawn O'Friel Indianapolis, Indiana
1151. David Bird Elkhart, Indiana
1150. Shawn Fisher Spencer, Indiana
1149. Kendra Harter Indianapolis, Indiana
1148. Hillary Stallings Syracuse, New York
1147. Jill Christman Muncie, Indiana
1146. Lee Zuver Labolt, South Dakota
1145. Michael F. Whisler Indianapolis, Indiana
1144. Hans Kelson bloomington, Indiana
1143. Frank Arnold Lafayette, Indiana
1142. Jesse Coker Vancouver, Washington
1141. Sue Purviance Chandler, Indiana
1140. Richard Wright Friday Harbor, Washington
1139. Alyssa Jackson Selma, Indiana
1138. Matthew Yates Jacksonville, Florida
1135. Michael Gold Riverdale, New York
1134. debra cummings Hammond, Indiana
1133. NICOLE LITTLEJOHN las vegas, Nevada
1132. Craig Luginbill Bloomington, Indiana
1131. Bob Jones Pleasantville, New York
1130. Jonna Gleason Newburgh, Indiana
1129. Lora Bunger Indianapolis, Indiana
1128. kevin lawson acton, Indiana
1127. Ray Taylor Kokomo, Indiana
1125. Ellen Lunsford Terre Haute, Indiana
1124. Delun Shi Granger, Indiana
1122. Greg Buse Auburn, Indiana
1120. Meghan Reef Bloomington, Indiana
1119. marcos mercado hemet, California
1117. Garoldina Vasque Rushville, Indiana
1116. Denice Scott Charlotte, North Carolina

1115. Chloe Holland Charleston, West Virginia
1114. Maja Cadikovska Crown Point, Indiana
1112. Victoria Hay Warwick, Rhode Island
1111. marlayna wright Austin, Texas
1110. Carol Hill Indianapolis, Indiana
1109. Chris Coffey Denver, Colorado
1108. Hilary Huddleston Nevada, Missouri
1106. Barbara Scheffer Fort Wayne, Indiana
1105. Zach Sellers Indiana, Indiana
1104. Nicholas Gross Shelbyville, Indiana
1103. Mark Bailey frankfort, Indiana
1102. Rebecca Harding Indianapolis, Indiana
1100. Christopher Elsner Indianapolis, Indiana
1099. Sarah Kirchner Warsaw, Indiana
1098. Carol Bunk Concord,, New Hampshire
1096. Josh Seier Cornelius, North Carolina
1095. Rebecca Bahr New York, New York
1094. Candy Smith Hobart, Indiana
1093. William McGuire Knightstown, Indiana
1092. Velinda Walton Antioch, California
1091. Sarah Heckathorn Pleasant Lake, Indiana
1090. Beatriz Pallanes Santa Ana, California
1089. Chad Badchkam West Palm Beach, Florida
1088. jenny Spurlock Milford, Ohio

Layton, Kimberly

From: Gary Borgmann [gborgmann@circledesigngroup.com]
Sent: Thursday, June 05, 2014 1:20 PM
To: Comments, Urc
Subject: Energy Efficiency in Indiana

I can't believe our Governor and our Legislators are terminating the **Energize Indiana** program halfway through before the benefits can be realized! Energy conservation is here to stay and to abandon it now is only putting off today what must be done tomorrow! It will not go away! The time is now! Why must we play catch-up? Why must we follow our neighboring states instead of leading? We should at the very least, keep up with the pack! Cancelling this program is so very shortsighted, and it concerns me and my faith in our leaders abilities to serve their constituents best needs! I have lived in Indiana for 56 years, since my birth and I have witnessed many changes. All changes related specifically to energy and the environment were necessary and costly, but it was for the good of the community, for Indiana, for our country! Everyone benefited! These changes will only cost more in the future. You know this to be true! I implore you to do the right thing for Indiana and our nation. Any future plans, or programs must be effective and fair to all citizens, and not just to industry.
Thank you for your time.

Sincerely,

Gary Borgmann, CPD
Plumbing Designer
Circle Design Group, Inc.
5510 S. East St., Suite F,
Indianapolis, IN 46227
Phone: 317.781.6200 Ext. 131

http://www.circledesigngroup.com
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Layton, Kimberly

From: Greene, Terri B [tgreene@indiana.edu]
Sent: Thursday, June 05, 2014 3:30 PM
To: Comments, Urc
Subject: Embrace Energy Efficiency of Indiana

Please recommend to Governor Pence that Indiana enact strong statewide energy efficiency policy. Energy efficiency is the least cost resource and the sooner we embrace energy efficiency as the preferred resource option, the sooner Indiana will realize the economic and societal benefits that come from continuing these investments.

Terri Greene
9510 S Snow Rd
Bloomington, IN 47403

Layton, Kimberly

From: Sam M. [kwyksylvyr29@gmail.com]
Sent: Thursday, June 05, 2014 10:02 PM
To: Comments, Urc
Subject: Energy Rates

I want the people who represent the state of Indiana to read the information on this news article link and be able to explain to its taxpaying citizens why it is that Indiana, specifically Evansville, is being screwed over on Vectren utility rates when comparing the same usage to our neighbor city of Henderson, KY. We both live by the river and both use the same electric, gas and coal for our heating and cooling. Yet Evansville Vectren bills are 300% higher than Hendersons.

Another example would be my coworker who lives in Louisville. He has a 2 story house with a basement and keeps his thermostat at a more comfortable level year-round than I do for a newer 1 story house without basement, and yet still my bill is ALWAYS at least TWICE the amount his is.

I'm calling bull***t and calling for the representatives of our state to stand up and reform our regulatory committee tolower our rates to at least a more modest level or watch our state lose homeowners and (more importantly) taxpaying locals.

Thank you
Samuel Magill

Layton, Kimberly

From: eric [echoem@att.net]
Sent: Friday, June 06, 2014 4:43 AM
To: Comments, Urc; echoem@att.net
Subject: State Energy Savings Program Rule Comments
Attachments: IURC.doc

Please find attached my comments.

Eric Michael

June 5, 2014

Eric Michael
Mishawaka, In 46544

General Counsel Beth Krogel Roads
Re: IURC's EE/DSM Recommendations
Indiana Utility Regulatory Commission
101 West Washington Street, Ste. 1500 E
Indianapolis, IN 46204

RE:Propsed IURC EE/DSM

According to Purdue University Indiana's electric rates are expected to rise about 32% by 2023.
http://www.courier-journal.com/story/news/local/indiana/2014/06/01/much-ind-power-plants-reduce-emissions/9841739/

And according to the U.S. Energy Information Administration's Consumer Expenditure Estimates for Energy by End-Use Sector, 1970-2010, residential customers have been paying more per year than either commercial customers or industrial customers for energy costs.
http://www.eia.gov/totalenergy/data/annual/#financial

It made no sense to me, in times like these that the Indiana Legislature would deem it fitting to eliminate the Energizing Indiana program. Indiana was the first state in the nation to eliminate it's energy efficiency program. At that time Gov. Pence failed to veto this legislative action.

Any new energy efficiency program for Indiana should be available to all residential customers in Indiana, not just those who are provided with energy from a utility under IURC oversight as the previous Energizing Indiana program operated.

The program should not be designed to cater to a limited number of industrial or commercial interests, who often, after having obtained government assistance, either fail or relocate. They have the means to include any expenditure as a business expense, whereas homeowners do not. Approximately 70% of the houses in Indiana are owner-occupied according to the US Census Bureau.
http://quickfacts.census.gov/qfd/states/18000.html
The rest would be occupied by tenants.

Indiana should adopt goals for energy efficiency. All ratepayers should contribute to a funding mechanism, on a per KwH used basis, that will fund projects to enable ratepayers to meet the established goals.

As electricity is a basic necessity of life in the present age the program should first seek to help those with limited incomes, who will by necessity be paying a higher percentage of their earnings than those with higher incomes.

Finally, there should be a third-party non-profit administrator to oversee the program.

Eric Michael

Layton, Kimberly

From: Leslie Webb [lwebb@indy.rr.com]
Sent: Friday, June 06, 2014 2:17 PM
To: Comments, Urc
Subject: Public Comment for New Energy Efficiency Program

Dear IURC -

I'm writing in regard to the IURC recommendations for a new energy efficiency program for legislation next year. I urge the IURC to:

- Re-instate energy efficiency goals in Indiana at least as good as goals established in Cause No. 42693, 2009
- Require ALL ratepayers to contribute. Any opt-outs for large electricity consumers must be fair and have other energy efficiency requirements associated with their ability to opt-out.
- Require an independent, non-profit third party administrator to oversee the program.

In 2009, under Gov. Daniels, the IURC set a state-wide energy savings target of 2% by 2019 and established the guidelines for what became the Energizing Indiana program. The IURC required that the program be administered by a third-party, and that ALL electric ratepayers contribute to the program.

Though not as ambitious as some states, such as Illinois which has a goal of 2% by 2015, the Energizing Indiana program is Indiana's most successful energy efficiency program to-date. A recent report shows Energizing Indiana has been more successful than prior utility-run programs and costs less than the national average to administer.

Third party audits show Indiana is saving $2 to $3 for every dollar invested in the program. These savings in energy dollars are good for families and the local economy. The program also created as many as 400 direct "green" jobs, and has saved enough energy to power over 93,000 homes since its inception in January 2012.

But perhaps the greatest benefit of an effective state-wide energy efficiency program is the reduced demand for electricity in the long run which delays the need to build expensive new power plants (such as the Edwardsport plant). **It is far less expensive to invest in 1,500 negawatts (watts not used) through energy efficiency programs, than to build new 1,500 megawatts of generation.** We all benefit from keeping energy rates stable.

It is rather embarrassing that Gov. Pence and Indiana legislators passed a law (SB340) that dismantles the state's successful energy efficiency program, becoming the first state in the country to do so. I urge the IURC to recommend a robust demand-side management program that is as good as or better than Energizing Indiana.

Warm regards,

Leslie Webb

5113 Hummingbird Circle

Carmel, Indiana

317-440-4017

Layton, Kimberly

From: Jennifer Blythe [riverbeauty3@gmail.com]
Sent: Friday, June 06, 2014 5:35 PM
To: Comments, Urc
Subject: Energy Policies - Public Comments

A wonderful activist from Citizens Action Coalition just stopped by and told us that Indiana is the first state in the USA to ELIMINATE ENERGY EFFICIENCY PROGRAMS! I can't believe it! In a state with such extreme high and low temps every year, people die without utilities, and the Efficiency Programs help keep costs down for people who can't afford the outrageous prices that are charged. Thank God in Heaven that our home was improved by the Monroe County Community Action Program's Weatherization services before this evisceration happened! Living on a fixed income is hard enough without having to be concerned if we can keep our house warm enough, as it is we set our heat at 65*F in the winter and bundle up because the cost of Duke Energy Electricity is so high! Our Church STILL helped us with our Electric bill this winter with the polar vortex and the opportunistic price hikes... we couldn't keep up! Please don't take away a major cost reducer for low-income folks in Indiana. Hoosiers are better than that! We take care of our own people.

Jennifer Blythe
1818 S. Olive Street
Bloomington, IN. 47401
(360) 525-4064

Layton, Kimberly

From: cmossian@aol.com
Sent: Friday, June 06, 2014 7:46 PM
To: Comments, Urc
Subject: Energy Efficiency Program

Please consider the following going forward:

Re-instate energy efficiency goals in Indiana at least as good as 2% by 2019, goals established in Cause No. 42693, 2009

- Require ALL ratepayers to contribute. Any opt-outs for large electricity consumers must be fair and have other energy efficiency requirements associated with their ability to opt-out.
- Require an independent, non-profit third party administrator to oversee the program

Thank you,

Claude Mossian

Layton, Kimberly

From: Schertz, Hannah H. [hschertz@indiana.edu]
Sent: Friday, June 06, 2014 8:09 PM
To: Comments, Urc
Subject: Energy efficiency

Hello,
I am writing to encourage support for reinstating Indiana's statewide energy efficiency programs. This includes Energizing Indiana. And minimizing support for new power plants. I would like to see Indiana at the helm of energy efficiency policy by implementing a statewide savings goal and an independent not-for-profit third part administrator to oversee a public purpose fund.

Sincerely,
Hannah Schertz

512 S Rose Ave.
Bloomington, IN 47401

Layton, Kimberly

From: Barbara Eden [edenbarbara@att.net]
Sent: Friday, June 06, 2014 10:37 PM
To: Comments, Urc
Subject: reinstate the state's energy efficiency program!

The state of Indiana's energy efficiency program is very important.
Please reinstate

Barbara Eden
Commercial & Residential Design
Space Planning
Project Management
edenbarbara@att.net
317-902-4131
http://www.linkedin.com/in/barbeden

P Please consider the environment before printing this email

Layton, Kimberly

From: gschenetzke@yahoo.com
Sent: Sunday, June 08, 2014 9:25 AM
To: Comments, Urc
Cc: Barb Richardson; Linda Porter
Subject: Make our energy use more efficient

Indiana needs to join the 21st Century and cut our carbon pollution, first by the URC recommending to the state legislature what laws are needed to assist Hoosiers become more efficient in its use, then by recommending a more balanced source of energy for our tomorrows.

Sent from Windows Mail

Layton, Kimberly

From: D Giangrossi [dgiangrossi@gmail.com]
Sent: Sunday, June 08, 2014 10:48 AM
To: Comments, Urc
Subject: Energy Efficiency in Indiana

I would like to add my comments regarding Indiana's energy strategy:

- The current administration — like others before — wants to make Indiana an attractive state for business by having low energy costs, but what about sustainability, air quality and water quality? Won't these things attract good workers, families and businesses to Indiana? Our neighboring states are way ahead of us – Illinois has a goal of two percent energy reduction by 2015 and Ohio has a goal of two percent by 2019.
- The Senate opted to eliminate energy efficiency programs because of cost; however, it is much cheaper to save a kilowatt than it is to figure out how to produce 1,500 more megawatts.
- Any opt-outs for large electricity consumers must be fair and have other energy efficiency requirements associated with their ability to opt-out.

Thank you,
Diane Giangrossi
110 W Main St Apt 449
Carmel IN 46032

Layton, Kimberly

From: JJ Newman Rode [jjnewmanrode@gmail.com]
Sent: Sunday, June 08, 2014 1:47 PM
To: Comments, Urc
Subject: We MUST support energy efficiency!

Dear members of the Utility Regulatory Commission,

First of all, thank you for the opportunity to provide comments on the issue of your recommendation to Governor Pence regarding statewide energy efficiency policy.

There is no doubt in anyone's mind that the world cannot go on using natural resources at the rate that we do. Even those who do not believe that global warming is an issue do not dispute the fact of shrinking oil and natural gas reserves. That is an established fact.

However, what we do about the issue is another matter. And yet, whatever we do to lower fuel costs for all of us, each and every one of us can conserve and do what we can to stretch our energy resources as far as possible. It only makes sense. In fact, only an idiot would not see the sense in conserving. Plus, everyone wants to save money!

But, how does an individual or family know how and where to best do so, especially with home energy? Energy Indiana's home energy audits have helped umpteen Indiana families to identify where they can save both energy and dollars. These programs are both extremely helpful to Hoosier families, but also necessary to help make our future energy picture brighter.

I STRONGLY urge you to recommend to Governor Pence a statewide energy efficiency policy that is both thorough and wide-reaching.

Thank you very much for this opportunity to provide comments.

Sincerely,

JJ Newman Rode
West Lafayette, Indiana

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You gain strength, courage and confidence by every experience in which you really stop to look fear in the face. You must do the thing you think you cannot do - *Eleanor Roosevelt*

Layton, Kimberly

From: Eisenberg, Paul D. [eisenber@indiana.edu]
Sent: Sunday, June 08, 2014 4:30 PM
To: Comments, Urc
Subject: reinstate energy eficiency

Attn: Beth Krogel Roads

I urge you to keep in mind that energy efficiency is the least cost resource, and that the sooner the state reinstates Energizing Indiana as the preferred resource option, the sooner we shall realize the economic and the societal benefits that come from continuing these investments.

Thanks very much for giving your attention to this VERY IMPORTANT matter.

Yours truly,

Paul D. Eisenberg, Ph.D.
1005 S. Hawthorne Drive
Bloomington, IN 47401

Layton, Kimberly

From: Rowe, Jeannette C [jrowe@iupui.edu]
Sent: Sunday, June 08, 2014 8:12 PM
To: Comments, Urc
Subject: energy efficiency

I am responding to requests for suggestions for a substitute for the energy efficiency program that was just eliminated. A 2 per cent reduction in use of electricity could easily be reached by conservation--turning lights and all electrical appliances off when they are not in use, by replacing appliances that are energy6 efficient. RE-instituting the Energizing Indiana plan. It has been very efficiently conducted and has saved electricity use by ratepayers. What more could we want?

Jeannette Rowe
4980 W. 59th Street
Indianapolis, IN 46254

Layton, Kimberly

From: Åsa [asa.wrammerfors@att.net]
Sent: Sunday, June 08, 2014 8:21 PM
To: Comments, Urc
Subject: Reinstate energy efficiency goals in Indiana

Please,

- Re-instate energy efficiency goals in Indiana at least as good as 2% by 2019, goals established in Cause No. 42693, 2009
- Require ALL ratepayers to contribute. Any opt-outs for large electricity consumers must be fair and have other energy efficiency requirements associated with their ability to opt-out.
- Require an independent, non-profit third party administrator to oversee the program.

Åsa Wrammerfors
1297, Helford Lane
Carmel, IN 46032

Skickat från min iPad

Layton, Kimberly

From: Tom Plant [tplant@aee.net]
Sent: Sunday, June 08, 2014 10:44 PM
To: Comments, Urc
Subject: Comments to the Indiana URC from Advanced Energy Economy
Attachments: IURC Comments from AEE.pdf

To Whom it may concern:

Advanced Energy Economy respectfully submits the attached comments in response to the request for public comments on the Indiana Energy Savings Program.

Sincerely,

Tom Plant

Tom Plant
Vice President, State Policy
Advanced Energy Economy
The business voice of advanced energy

Email: tplant@aee.net | Mobile: 303.249.0887
Web: www.AEE.net | Twitter: @AEEnet

ADVANCED ENERGY ECONOMY

the business voice of advanced energy

Comments to the Indiana Utility Regulatory Commission (IURC)

ENERGY EFFICIENCY (EE) AND DEMAND SIDE MANAGEMENT (DSM) RECOMMENDATIONS

INTRODUCTION

Advanced Energy Economy (AEE) is a national business organization representing leaders in the advanced energy industry. In the report *Advanced Energy Now – 2014 Market Report* it was shown that advanced energy represents a global market of over $1.1 trillion and that the US share of this market grew from 11% in 2012, to 15% in 2013.

This growth in advanced energy is being driven rapid technological change, and is supported by policies and regulations designed to maximize the efficiency, intelligence and effectiveness of the energy sector. AEE supports a broad portfolio of technologies, products and services that enhance US competiveness and economic growth through an efficient energy system that is clean, secure and affordable.

Energy efficiency (EE) represents the first opportunity in developing a modern, high-performing electricity grid. While there are many important generation, distribution and energy management decisions to be made by public utility commissions around the country, the effect of those decisions is always improved when placed upon the foundation of a system that is operating efficiently and that has customers that are using energy in an efficient manner.

Indiana has great opportunities to increase energy productivity, and in so doing, increase the benefit to ratepayers of all other utility investments. Energy efficiency investments represent the greatest value to the ratepayer on a per kWh basis.

After taking an inventory of energy efficiency programs from around the country, the Lawrence Berkley National Laboratory[1] determined that, on average, energy efficiency investments nationwide were delivered at a cost of just 2.1¢/kWh and $0.56/therm. In the Midwest, these improvements were delivered at a nation-leading 1.4¢/kWh. Contrast this with the 9¢/kWh the average customer pays for electricity in Indiana. Furthermore, the study found that commercial and industrial (C&I) investments in natural gas efficiency programs were achieved at just $0.17/therm. If efficiency is viewed as a resource for meeting demand just like any other resource, it represents the lowest cost option. Clearly, investments in energy efficiency are in the economic interests of all Indiana ratepayers.

Moreover, investments in energy efficiency may help ease anticipated capacity shortfalls over the next few years. Recent rules regarding emissions of mercury and other toxins from coal and oil generators, coupled with low natural gas prices, have led to a wave of plant closures. As this wave crests in the next few years, reserve margins throughout the Midwest – especially in Indiana and Michigan – are expected to fall. To keep the lights on during peak days, grid

[1] US Department of Energy, *"The Program Administrator Cost of Saved Energy for Utility Funded Energy Efficiency*

operators will need new capacity resources to meet potential shortfalls. Energy efficiency can help do this in a quick and affordable way.

Finally, recently released draft rules from the Environmental Protection Agency[2] include direct reference to the acceptance of strong energy efficiency objectives as a mechanism for compliance with upcoming regulations of greenhouse gases under section 111(d) of the Clean Air Act. As Indiana develops a plan for section 111(d), strong energy efficiency targets will represent one of the most cost-effective mechanisms for state compliance.

BACKGROUND ON CURRENT RECOMMENDATIONS

On March 28, 2014, Indiana Senate Enrolled Act 340 (SEA 340) became law in Indiana. SEA 340 provides that certain industrial customers may opt out of participation in utility energy efficiency programs and that after December 31, 2014, the IURC may not require an electricity supplier to meet a goal or target established in their December 9, 2009, DSM/EE order.

On April 9, 2014, the IURC issued a General Administrative Order requesting comments regarding what should be considered as part of their EE and DSM recommendations to Governor Pence and the Indiana General Assembly. Specifically, Governor Pence requested the IURC address the following issues:

1. Include appropriate energy efficiency goals for Indiana.
2. Reflect an examination of the overall effectiveness of current DSM programs in the state.
3. Reflect any and all issues that may improve current DSM programs.
4. Reflect a thorough benefit-cost analysis of the cost impact to ratepayers of possible DSM programs
5. Allow for an opt-out whereby large electricity consumers can decide not to participate in a DSM program

In the comments below, AEE has focused on issues 3, 4 and 5.

The final section entitled "Modernizing utility program offerings" contemplates additional considerations for the IURC as they seek to improve utility energy efficiency offerings on behalf of the state's ratepayers.

ISSUE #3: REFLECT ANY AND ALL ISSUES THAT MAY IMPROVE CURRENT DSM PROGRAMS

EXPEDITE APPROVAL OF CURRENT EE PROGRAMS

Energy efficiency programs are providing cost savings benefits for consumers as well as avoiding costly future investments in generation and transmission infrastructure around the country. Additionally, the energy efficiency industry provides jobs that can't be outsourced and contribute to the state's economy. By these measures, utility investments in EE programs are good for the state and the utility's ratepayers.

Such experiences have been studied and documented in many other states. For example, a recent economic impact study conducted in Michigan estimated the creation of 101 annual full-time equivalent jobs for every $1 million spent

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[2] Environmental Protection Agency, "Clean Power Plan – Carbon Pollution, Emissions guidelines for existing stationary sources: Electric Utility Generating Units", (June 2014)

on energy efficiency programs.[3] In Wisconsin, a report conducted by Cadmus and commissioned by the state's Public Utilities Commission[4] found that efficiency measures cost the consumer on average 2.5¢/kWh – and reduced demand by 88 MW. In Ohio, Ohio State University ran a Dynamic Energy-Economic Policy Simulation (DEEPS) and found that their energy efficiency standard:

> *"resulted in a 1.4% reduction in Ohio electricity bills. In addition, increased investments in the energy sector stimulated GDP by $160 million in 2012, and created over 3,200 Ohio jobs in the period from 2008 to 2012."*

A recent study from the American Council for an Energy-Efficient Economy (ACEEE)[5] estimated that a 1.5% annual energy efficiency standard in Indiana, implemented cost-effectively, would drop demand by over 5,800 GWh/year by 2020. This would reduce customer bills substantially while avoiding future generation costs.

At a time when Indiana is still recovering from the recession, it is more important than ever that the IURC send a signal to businesses regarding the 2015 EE/DSM programs that will allow them to retain their investments and workforce in the state. Furthermore, this will ensure continuity while the IURC evaluates future EE/DSM program offerings. To put current programs on hold would not only have near-term negative impacts on the state's economy, but would also burden future programs with start-up costs and delays and lead to customer confusion associated with an interruption in program outreach efforts.

Recommendation 1: To ensure continuity in program delivery, customer engagement and private industry investment, the IURC should expedite approval of regulatory filings aimed at continuing EE/DSM programs in 2015. The goal should be to complete approvals by September 1, 2014, to minimize disruption among consumers and market providers by allowing program implementation contractors sufficient time to transition and/or startup programs.

ESTABLISH AN ENERGY EFFICIENCY TARGET BASED UPON A RIGOROUS ASSESSMENT OF MARKET AND TECHNOLOGY POTENTIAL

With the recent legislation removing the statutory directive on energy efficiency targets, the IURC now has an opportunity to look at the system-wide potential to achieve energy efficiency savings beyond the 2015 program year. The legislation frees the commission to conduct an analysis of the current opportunities and look toward leading practices throughout the country that will best serve the Indiana ratepayer. There is also the opportunity to engage with stakeholders and build consensus on a set of EE targets and an implementation plan that will receive broad-based support.

Recommendation 2: AEE recommends the IURC hire an experienced, impartial third party to conduct a rigorous assessment of the market potential for cost effective energy efficiency programs in Indiana. This analysis should include an evaluation of existing market potential studies, the savings that will likely be achieved through market evolution, and what savings can be driven by utility program implementation. The market study should evaluate

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[3] http://www.michigan.gov/documents/mpsc/econ_impact_ee_investments_402572_7.pdf

[4] "Focus on Energy - Calendar Year 2013 Evaluation Report, Volume II", Public Service Commission of Wisconsin, (May 2014)

[5] Hayes, S. et al. 2014. *Change Is in the Air: How States Can Harness Energy Efficiency to Strengthen the Economy and Reduce Pollution.* Washington, DC: American Council for an Energy-Efficient Economy. http://aceee.org/research-report/e1401

those programs that are both technologically and economically achievable as well as recommendations on appropriate evaluation, measurement and verification (EM&V) procedures.

Recommendation 3: AEE supports the development of a well-defined binding target for cost effective energy efficiency deployment. In our experience, a binding target sends a clear signal to utilities and market participants, and provides the certainty necessary for development and execution of business plans and investment.

COPY OR EXPAND THE SCOPE OF THE SUCCESSFUL NATURAL GAS DSM OVERSIGHT BOARD MODEL

The natural gas DSM Oversight Board governance model offers a good model for consideration by the IURC. This board ensures representative governance and sufficient focus on energy efficiency while allowing the utilities to administer programs in an efficient manner. It has served Indiana well since 2006, and could be replicated or extended to include the electricity efficiency programs.

Recommendation 4: AEE recommends either copying or expanding the natural gas DSM oversight board model to include electricity. The board approval process should be limited to only those changes in the program that exceed a specified threshold of modification in the established objectives for the utility program offerings. Utilities should be granted the authority to administer modifications below such a threshold, which will avoid delays due to oversight board approval for relatively small changes in the program.

CONSIDER ENERGY EFFICIENCY AS A RISK REDUCTION INVESTMENT STRATEGY

Historically, Indiana has seen a steady rise in electricity prices (see Figure A below). While this trend can be attributed to many factors, as has already been pointed out above, the most cost-effective way to mitigate this impact on the consumer is to maximize investments in energy efficiency as a resource. Beyond this direct economic benefit, EE has an important risk mitigation function. In their study entitled *Practicing Risk Aware Regulation*,[6] CERES identified energy efficiency as the utility investment with the lowest long-term risk (Figure B). From a consumer protection standpoint, this is an important part of a diversified utility investment portfolio.

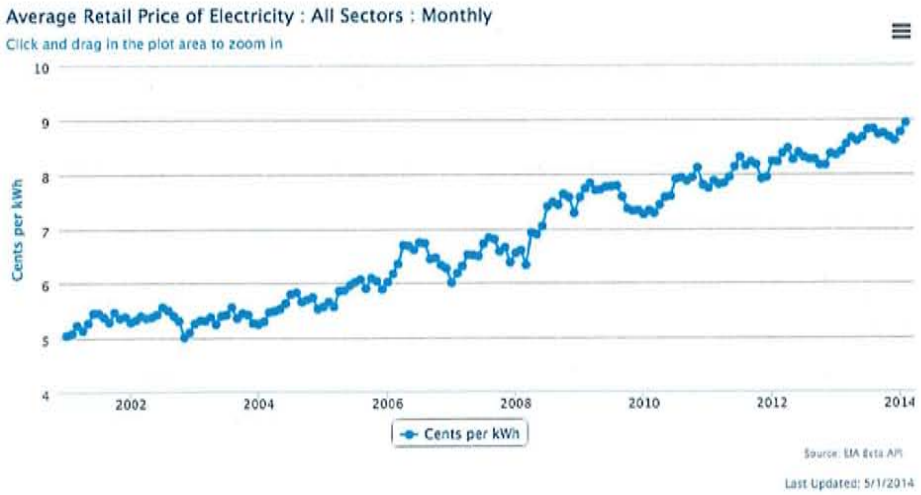

Figure A - Average retail price of electricity, Ohio - Source: Energy Information Agency

[6] Binz, Sedano, Furey, Mullen, *Practicing Risk Aware Electricity Regulation: What every state regulator needs to know*, April 2012.

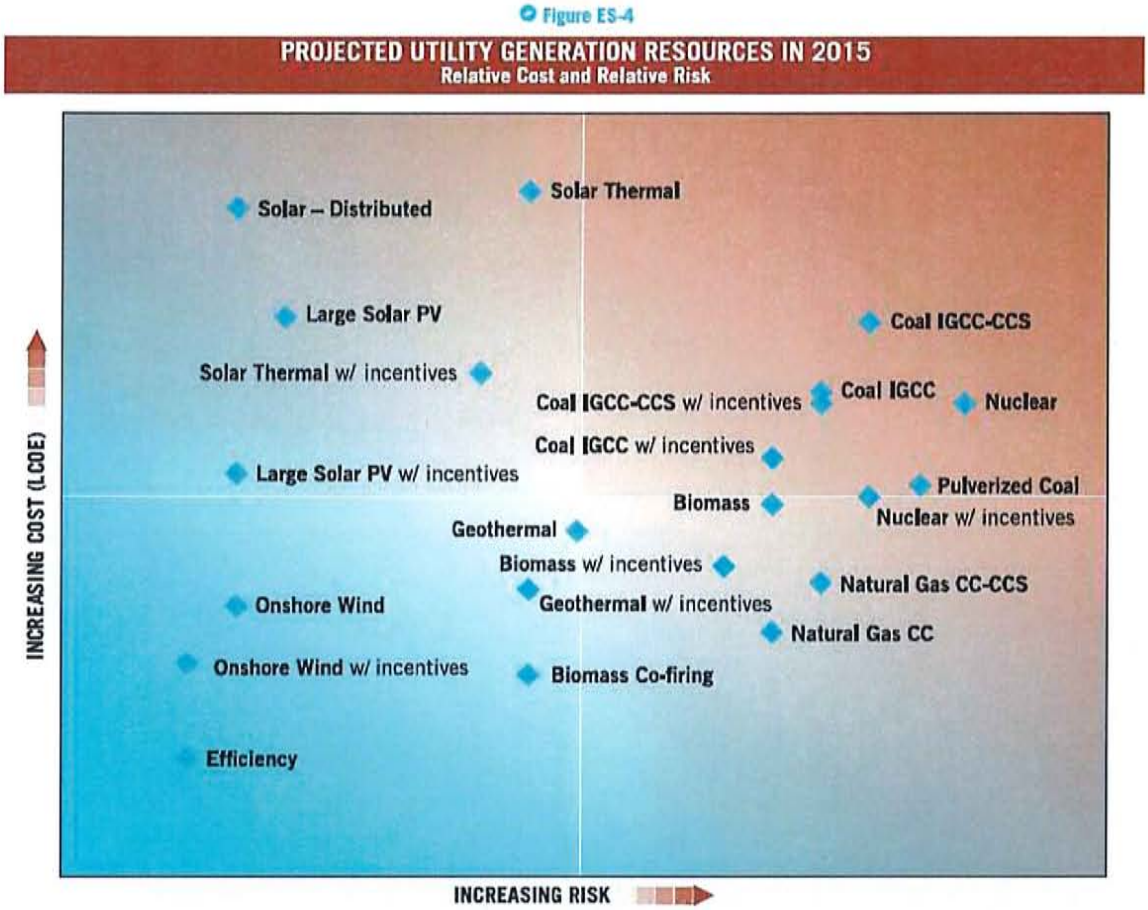

Figure B - Relative Cost vs Risk of Resources

Recommendation 5: By including risk mitigation in IRP investment decisions, the IURC can ensure they are performing their fiduciary duty to not only choose the least cost resource, but also mitigate consumer risk of increasing energy costs in the future.

Energy efficiency programs can involve short-term savings as well as longer term system improvements. Both of these types of programmatic structures serve to make the energy system more productive, but exhibit differing characteristics related to short and long term returns as well as long term risk reduction for consumers.

Recommendation 6: The IURC should establish lifecycle savings goals as well as annual incremental goals within the DSM portfolio. This will allow for a diversity of program offerings that can balance immediate "low-hanging fruit" with energy efficiency measures that deliver greater savings over time and reduce the overall risk to the ratepayer.

PROVIDE UTILITIES WITH A BUSINESS INCENTIVE TO ACHIEVE AND EXCEED NEWLY ESTABLISHED EFFICIENCY GOALS

Utilities operate under a business model that provides an inherent disincentive to their investors to employing an efficient utility system – particularly on the demand side. Since demand side efficiency is one of the primary objectives

of an effective DSM program, the commission should establish an incentive structure whereby the utility earns lost revenue + an added bonus for achieving the goals with an additional bonus for exceeding the goals. Utility shareholders should see a significant return on equity in cost effective efficiency investments to support the utility business case for such investments. By employing such a policy, Indiana can be certain the utility and the investors will see a financial benefit to achieving energy productivity goals.

Recommendation 7: The IURC should establish incentives including lost revenue recovery plus a bonus structure that rewards the utility and their investors for achieving, and exceeding, energy efficiency goals. The objective should be to make energy efficiency investments attractive for the utility business model.

ISSUE #4: REFLECT A THOROUGH BENEFIT-COST ANALYSIS OF THE COST IMPACT TO RATEPAYERS OF POSSIBLE DSM PROGRAMS

The cost effectiveness test is one of the most important tools to ensure Indiana's ratepayers are getting the best value for their investment in all resources, including energy efficiency. A great deal has been written recently[7] on the use of cost effectiveness tests in DSM programs, and a uniform conclusion is that the Total Resource Cost (TRC) test is not necessarily the best measure for the cost effectiveness of utility investments in DSM programs.

The legislative language within SEA 340 directing that costs of utility programs should include only "program costs, lost revenues and incentives approved by the commission" supports this conclusion. With this language, the legislature suggests a move away from the TRC test and toward a cost-benefit test such as the Program Administrator Cost (PAC) test or a Levelized Cost of Saved Energy (CSE) test. AEE agrees with this recommendation from the legislature.

The PAC test is not only a much better comparison of demand side investments versus supply side investments, but it also provides a more flexible mechanism for utilities to identify the appropriate level of incentive for a broad range of energy efficiency technologies. In their assessment of cost tests, Cadmus's utility DSM experts[8] concluded that:

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[7] US Department of Energy, *"The Program Administrator Cost of Saved Energy for Utility Funded Energy Efficiency Programs", Lawrence Berkeley National Laboratory (March 2014)*

Ellsworth, et al, "Energy Efficiency at a Crossroads: Opportunities for the Future", (August 2013)

"Picking a Standard: Implications of Differing TRC Requirements," by Elizabeth Daykin with Jessica Aiona and Brian Hed- man of Cadmus (presented at the AESP National Conference and Expo, January 2011).

"Best Practices in Energy Efficiency Program Screening: How to Ensure that the Value of Energy Efficiency is Properly Accounted For," Synapse Energy Economics, July 2012.

"Valuing Energy Efficiency," by Hossein Haeri and M. Sami Khawaja. Public Utilities Fortnightly (July 2013): pp. 28-36.

"Is it Time to Ditch the TRC? Examining Concerns with Current Practice in Benefit-Cost Analysis," Neme and Kushler, 2010 ACEEE Summer Study on Energy Efficiency in Buildings.

[8] "Valuing Energy Efficiency," by Hossein Haeri and M. Sami Khawaja. Public Utilities Fortnightly (July 2013): pp. 28-36.

"The advantages of using the PAC test are many and obvious. It reduces the uncertainties associated with estimating incremental measure costs, avoids the complexities of estimating potential non-energy benefits to participants and worrying about how to discount them; above all, it provides a more rational basis for designing programs and incentive structures that are more compatible with how utilities' procure resources."

A recent report from the Lawrence Berkeley National Laboratory proposed the use of a similar "Cost of Saved Energy" Test (CSE) to determine cost effectiveness, but also allows for the application of a discount rate over time to arrive at a "levelized cost of saved energy". The American Council for an Energy Efficient Economy agrees. In their March 2014 report, *The Best Value for America's Energy Dollar: A National Review of the Cost of Utility Energy Efficiency Programs,* the ACEEE states:

"The levelized CSE is the best measure for comparing energy efficiency to other energy resource options"[9]

In either case, use of the PAC or the CSE tests would provide a better measure of DSM program cost effectiveness than the current TRC. Adoption of either of these mechanisms would allow the IURC and utilities to determine the most cost effective program design allowing for an adjustment up (to drive the market) or down (to increase cost effectiveness). The TRC does not allow for an effective measure of either of these important considerations. Finally, the TRC does not allow for a comparison on a cost per kWh, or per therm, basis of demand side resources with supply side resources. Efficiency saves money for the ratepayers when it is less expensive than generation or transmission alternatives. The PAC and CSE allow for an accurate comparison of those costs.

Recommendation 8: AEE recommends that the IURC adopt either the PAC or CSE cost-effectiveness tests for its DSM programs.

PROMOTE INNOVATION AND EVOLUTION OF INDIANA'S DSM PROGRAMS

While the cost-effectiveness test is a critical tool for establishing a comprehensive DSM program it is important to continue to innovate and provide a pathway for new technologies in the DSM portfolio. Technologies early in their lifecycle may not meet such a cost effectiveness screening, but carefully applied, a pathway toward market adoption for such technologies can attract investment to Indiana and spur innovation.

Recommendation 9: To promote continued innovation and investment in Indiana, the IURC should consider a pathway toward market adoption for technologies that the commission determines may show technological promise but may not currently meet cost effectiveness tests. Such a pathway should allow for both an analysis of those promising technologies, a structure for accelerated market deployment with an eye toward evaluation for inclusion in the state's energy efficiency program offerings. Furthermore, utilities should be allowed to capture the program savings associated with these new and innovative technologies and count those savings toward their energy efficiency targets.

DEVELOP A PATHWAY FOR JOINT PROGRAMS TO IMPROVE COST EFFECTIVENESS

Oftentimes there are co-benefits in energy efficiency investments on the natural gas side and the electric side. For example, improved insulation in a home not only reduces the natural gas needed for heating, but also reduces electricity used for air conditioning. The IURC should develop a standard for the allocation of costs between electric and natural gas utilities when operating joint programs or when they cover common measures, which will improve overall program cost-effectiveness.

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[9] Maggie Molina, "The Best Value for America's Energy Dollar: A National Review of the Cost of Utility Energy Efficiency Programs", (March 2014)

Recommendation 10: AEE recommends allocating costs based on the proportion of benefits associated with each fuel type to maximize the deployment and investment in energy efficiency technologies that show impacts in both the electric and the gas sectors, and ensures an equitable distribution of cost among both electric and natural gas ratepayers.

PROVIDE UTILITY WITH SUFFICIENT PROGRAMMATIC TIMEFRAME TO ACHIEVE THEIR GOALS

The IURC should allow for multi-year, not annual, savings goals to provide flexibility in program implementation for the utility. Oftentimes, laying the foundation for a successful program takes time and requires an extended period of evaluation. Providing a sufficiently long timeframe for program implementation avoids costly program stops and starts and allows for modifications and course corrections as needed. Even with a multi-year approach it will be important to have interim goals to ensure that programs are on track.

Recommendation 11: The IURC should combine the utility's DSM program design with the utility's Integrated Resource Plan (IRP). In doing so, the commission both allows time for the programs to succeed while incorporating energy efficiency as a resource within the utility's overall strategic investment plan.

ISSUE #5: ALLOW FOR AN OPT-OUT WHEREBY LARGE ELECTRICITY CONSUMERS CAN DECIDE NOT TO PARTICIPATE IN A DSM PROGRAM

This is an approach that has been pursued by a number of states. The mechanism for implementation is the most critical component in achieving the desired outcome.

Large electricity consumers argue they should be allowed an opt-out from ratepayer supported efficiency programs because 1) there is a disproportionately large financial impact when an efficiency surcharge is allocated on a cost/kWh basis for large consumers and 2) they invest separately in their own efficiency improvements as a regular course of business.

Clearly, it is in the interests of both the large industrial customer and the overall customer base for large energy users to make investments in energy efficiency. Therefore, an opt-out provision should be structured to ensure those investments are being made – if not by the program, then by the large industrial customer themselves. If there aren't existing opportunities, the large industrial customer should be rewarded for already making those investments by being excluded from participation in the DSM program.

Recommendation 12: A large industrial consumer opt-out program should be structured to both drive investment in energy efficiency and reward early adopters. The IURC should adopt an opt out program that includes the following components:

- Require a thorough audit of operations to identify and quantify the best investments the company can make in cost-effective energy efficiency improvements

- The company should develop a Strategic Energy Management Plan (SEMP) to prioritize and plan for investment in improvements that show a five-year simple payback or less

- Report to the IURC on their progress toward achieving the efficiency objectives and share with the utility the results of their investment

- Require verification of the results achieved by an unbiased third-party consistent with the treatment of utility funded programs

This will ensure not only that the industrial customers are contributing to the efficiency of the overall utility system through an alternative mechanism, but that they are investing in the most cost effective measures for their industrial processes.

EXPAND OPPORTUNITIES FOR COMBINED HEAT AND POWER (CHP)

Combined heat and power (CHP) has met with great success in Indiana, but there is additional potential that has not been captured. In a report from the Great Plains Institute, over 3,000MW of technical capacity was identified.[10] Technical potential is defined as the CHP electrical capacity that could be installed at existing industrial and commercial sites based on their electric and thermal needs.

Recommendation 13: The IURC should consider a separate program for large industrial consumers to drive deployment of CHP in combination and coordination with any large industrial user opt-out provisions.

MODERNIZING UTILITY PROGRAM OFFERINGS

Utilities face a critical challenge throughout the country attempting to achieve compliance with energy efficiency targets. Specifically, with the advent of new federal lighting standards, utilities can no longer claim lighting upgrades toward compliance with these targets. This is significant, because utilities around the nation have relied heavily on lighting upgrades in their efficiency program offerings.

Lighting has represented the low-hanging fruit of electric efficiency efforts for quite some time. The recent LBNL study found that lighting accounted for 44% of the national residential program savings at a cost of just 0.7¢/kWh. However the national average cost for residential efficiency programs of 1.8¢/kWh only increased to 2.8¢/kWh when lighting programs were completely removed, demonstrating that efficiency programs are still very cost effective investment even without traditional lighting retrofits.[11]

In a Cadmus study released in August 2013,[12] they acknowledged these challenges, but argued against eliminating energy efficiency targets because of them. In making this argument, they highlighted a number of programmatic changes (including a reform of the cost effectiveness tests discussed earlier) that would benefit the utility customer, the efficiency of the system, as well as allowing utilities to continue to meet their efficiency objectives.

Included in these recommendations were:

- Incorporating promising new technologies including
  - LED Lighting
  - Heat Pump Water Heaters
  - Advanced Controls

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[10] "Combined Heat and Power Fact Sheet" http://www.betterenergy.org/sites/gpisd.net/files/Indiana.pdf

[11] US Department of Energy, *"The Program Administrator Cost of Saved Energy for Utility Funded Energy Efficiency", Lawrence Berkeley National Laboratory (March 2014)*

[12] Ellsworth, et al, "Energy Efficiency at a Crossroads: Opportunities for the Future", (August 2013)

- Alternative Program Design Concepts
    - Upstream Programs
    - Instant Rebates
    - Off-site residential audits
    - Residential Performance Contracting
    - Leveraging Codes and Standards
    - Behavior Based Programs
- Advanced Financing Programs
    - While financing should not be considered a way of driving demand, it can be an effective way to remove barriers for deployment. States such as Hawaii, Connecticut and Michigan among others have developed loan funds for accelerating adoption of energy efficiency measures.
    - Utilities can be partners in the deployment of these funds through on-bill loan repayment programs (as contrasted with on-bill financing) that leverage private sector capital and use the convenience of the utility bill to collect repayment of loans.
    - Private capital can be effectively leveraged with a robust energy performance-contracting program that maximizes efficiency targets in the MUSH (Municipal, University, Schools, Hospitals) market.

All of these are available program modifications to the current DSM plan that would contribute to consumer savings and modernize the program offerings to provide system-wide improvements in energy efficiency.

CONCLUSIONS

The legislative actions under SEA 340 allow the IURC to conduct a thorough examination of Indiana's demand side management programs and make comprehensive changes that will accelerate growth of Indiana's growing efficiency industry while reducing costs for utility customers.

The IURC should embrace this opportunity by considering the following recommendations contained in our comments:

Recommendation 1: To ensure continuity in program delivery, customer engagement and private industry investment, the IURC should expedite approval of regulatory filings aimed at continuing EE/DSM programs in 2015. The goal should be to complete approvals by September 1, 2014, to minimize disruption among consumers and market providers by allowing program implementation contractors sufficient time to transition and/or startup programs.

Recommendation 2: AEE recommends the IURC hire an experienced, impartial third party to conduct a rigorous assessment of the market potential for cost effective energy efficiency programs in Indiana. This analysis should include an evaluation of existing market potential studies, the savings that will likely be achieved through market evolution, and what savings can be driven by utility program implementation. The market study should evaluate those programs that are both technologically and economically achievable as well as recommendations on appropriate evaluation, measurement and verification (EM&V) procedures.

Recommendation 3: AEE supports the development of a well-defined binding target for cost effective energy efficiency deployment. In our experience, a binding target sends a clear signal to utilities and market participants, and provides the certainty necessary for development and execution of business plans and investment.

Recommendation 4: AEE recommends either copying or expanding the natural gas DSM oversight board model to include electricity. The board approval process should be limited to only those changes in the program that exceed a specified threshold of modification in the established objectives for the utility program offerings. Utilities should be granted the authority to administer modifications below such a threshold, which will avoid delays due to oversight board approval for relatively small changes in the program.

Recommendation 5: By including risk mitigation in IRP investment decisions, the IURC can ensure they are performing their fiduciary duty to not only choose the least cost resource, but also mitigate consumer risk of increasing energy costs in the future.

Recommendation 6: The IURC should establish lifecycle savings goals as well as annual incremental goals within the DSM portfolio. This will allow for a diversity of program offerings that can balance immediate "low-hanging fruit" with energy efficiency measures that deliver greater savings over time and reduce the overall risk to the ratepayer.

Recommendation 7: The IURC should establish incentives including lost revenue recovery plus a bonus structure that rewards the utility and their investors for achieving, and exceeding, energy efficiency goals. The objective should be to make energy efficiency investments attractive for the utility business model.

Recommendation 8: AEE recommends that the IURC adopt either the PAC or CSE cost-effectiveness tests for its DSM programs.

Recommendation 9: To promote continued innovation and investment in Indiana, the IURC should consider a pathway toward market adoption for technologies that the commission determines may show technological promise but may not currently meet cost effectiveness tests. Technologies early in their lifecycle may not meet such a cost effectiveness screening, but carefully applied, a pathway toward market adoption for such technologies can attract investment to Indiana and spur innovation. Such a

pathway should allow for both an analysis of those promising technologies, a structure for accelerated market deployment with an eye toward evaluation for inclusion in the state's energy efficiency program offerings. Furthermore, utilities should be allowed to capture the program savings associated with these new and innovative technologies and count those savings toward their energy efficiency targets.

Recommendation 10: AEE recommends allocating costs based on the proportion of benefits associated with each fuel type to maximize the deployment and investment in energy efficiency technologies that show impacts in both the electric and the gas sectors, and ensures an equitable distribution of cost among both electric and natural gas ratepayers.

Recommendation 11: The IURC should combine the utility's DSM program design with the utility's Integrated Resource Plan (IRP). In doing so, the commission both allows time for the programs to succeed while incorporating energy efficiency as a resource within the utility's overall strategic investment plan.

Recommendation 12: A large industrial consumer opt-out program should be structured to both drive investment in energy efficiency and reward early adopters. The IURC should adopt an opt out program that includes the following components:

- Require a thorough audit of operations to identify and quantify the best investments the company can make in cost-effective energy efficiency improvements
- The company should develop a Strategic Energy Management Plan (SEMP) to prioritize and plan for investment in improvements that show a five-year simple payback or less
- Report to the IURC on their progress toward achieving the efficiency objectives and share with the utility the results of their investment
- Require verification of the results achieved by an unbiased third-party consistent with the treatment of utility funded programs

This will ensure not only that the industrial customers are contributing to the efficiency of the overall utility system through an alternative mechanism, but that they are investing in the most cost effective measures for their industrial processes.

Recommendation 13: The IURC should consider a separate program for large industrial consumers that drive deployment of CHP in combination and coordination with any large industrial user opt-out provisions.

Advanced Energy Economy submits these recommendations on behalf of the energy efficiency companies that make up our membership and are committed to maximizing efficiency opportunities within a high-performing electric utility system. AEE is willing to assist the commission in this endeavor and continue to work with the commission to expand investment opportunities in Indiana while bringing utility customers a more cost effective and efficient energy system.