

December 5, 2008

Beth Krogel Roads
Commission Counsel
Indiana Utility Regulatory Commission

Dear Ms. Roads:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes proposed by the Indiana Utility Regulatory Commission ("IURC") and contained in LSA Document 08-670, which amends 170 IAC 1-5, the minimum standard filing requirements ("MSFR") for a rate case to be decided on an expedited basis. The utility files the required documentation at the beginning of the case, and, in exchange, the Commission agrees to expedite the processing of the rate case, so that the utility has the Commission's decision in a specific timeframe (ten (10) months).

This rule affects only a small percentage of those small businesses that currently, or may at some time in the future, provide electric, gas, water, sewage disposal, or telecommunications services in Indiana under the jurisdiction of the IURC. There are currently 134 small businesses that are authorized to provide the above referenced types of services under the jurisdiction of the IURC. The number of other small businesses that will be subject to this rule will probably increase gradually over time as property continues to be developed in Indiana and small businesses continue to apply for authorization to offer utility services. However, the IURC does not have the information needed to accurately forecast what this increase will be.

The impact statement prepared by the IURC indicates that the rule imposes no new reporting requirements on affected small business other than those that are already required under statute. The IURC does not estimate that these costs will be substantial. Additionally, by providing a process whereby affected utilities can receive a decision regarding future rates within a specific timeframe, the rule supports improved efficiency and financial planning for affected entities. The IURC indicates that the proposed rule does not impose any direct fees or economic costs on affected entities.

The IEDC does not object to the economic impact associated with the proposed rule changes. The rule does not impose any economic costs or reporting requirements not already provided for in statute. Additionally, the rule provides a process by which utilities can receive decisions regarding future rates on an expedited and specific schedule, which is a significant benefit to affected entities. If you have any questions about the comments contained herein please contact me at 232-8962 or rasberry@iedc.in.gov.

Regards,



Ryan Asberry
Assistant Vice President
Indiana Economic Development Corporation



Indiana Economic Development Corporation

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Regards,

A handwritten signature in black ink, appearing to read "Ryan Asberry", written over a horizontal line.

Ryan Asberry
Assistant Vice President
Indiana Economic Development Corporation