



Indiana Economic Development Corporation

One North Capitol, Suite 700
Indianapolis, Indiana 46204
Tel 317.232.8800
Fax 317.232.4146
www.AccelerateIndiana.com

December 28, 2009

DeAnna L. Brunner
Assistant General Counsel
Indiana Utility Regulatory Commission

Dear Ms. Brunner,

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 09-790. The proposed rule adds 170 IAC 15 to establish sub-billing procedures for water and sewage disposal service.

The economic impact statement prepared by the IURC indicates that the proposed rule will result in no increased costs to small businesses. Landlords are currently under no obligation to sub-bill nor would they be under the proposed rule. Therefore, compliance with the proposed rule is voluntary.

Additionally, the proposed rule could potentially result in decreased costs to landlords by clarifying the means by which a landlord can be classified outside the definition of a "public utility", thus eliminating annual public utility fees for sewage disposal and water.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232-8962 or rasberry@iedc.in.gov.

Regards,

A handwritten signature in black ink, appearing to read "Ryan Asberry", with a long horizontal flourish extending to the right.

Ryan Asberry
Assistant Vice President