



The State Agency Representing
Hoosier Utility Ratepayers

April 17, 2025

Beth E. Heline,
General Counsel
INDIANA UTILITY REGULATORY COMMISSION
101 W. Washington St. Ste., 1500 East
Indianapolis, IN 46204
Email: bheline@urc.IN.gov

Re: OUCC's Comments and Proposals IURC Strawman MSFR and Fiscal Impact

Dear Ms. Heline:

Thank you for providing the OUCC the opportunity to review the Commission's 2/12/2025 Strawman. We support the proposed rule changes included in the Strawman and propose some modifications informed by our experience in reviewing rate cases. Attached to this email is an explanation of our proposed changes. I also include the draft strawman in word with the OUCC's suggested changes in redline. If you have any questions about our comments and suggestions, we would appreciate the opportunity to discuss them.

I am also taking this opportunity to provide a fiscal impact statement that reflects any savings in OUCC personnel hours that may result from the enactment of the rule. The fiscal impact depends on the number of general rate cases that may be filed, which vary from year to year and from division to division. Assuming substantial compliance with the rules, including those changes proposed by the OUCC, we estimate the net effect on personnel hours of the updated MSFRs will be a freeing up of roughly 120-150 total personnel hours per year. Those personnel hours may then be reallocated to pursue our agency mission in other cases.

Thank you again.

Sincerely,

A handwritten signature in black ink, reading "Daniel M. Le Vay".

Daniel M. Le Vay,
Senior Deputy Consumer Counselor

Enclosure