

## **Comments of the Indiana Energy Association Concerning the Commission’s Proposed Modifications to Integrated Resource Plan Rules**

The Indiana Energy Association (“IEA”), on behalf of its investor-owned electric utility members, hereby submits the following brief comments on the Commission’s proposed modifications to its Integrated Resource Plan rules – specifically, proposed modifications to 170 IAC 4-7-2 and 170 IAC 4-7-2.6. The IEA appreciates the opportunity to provide these comments.

### **1. Integrated resource plan submission – 170 IAC 4-7-2**

First, 170 IAC 4-7-2(c) would require submission of the IRP and other related documents via the electronic filing system if requested by the director. IEA simply notes that such documents will be very voluminous and the current electronic filing system’s system limitation of 25 MB may prevent submission of such documents electronically.

Second, IEA suggests that the data required to be filed pursuant to 170 IAC 4-7-2(c)(2)(A) be limited to non-confidential and non-proprietary data. This will give the utility the ability to limit the size of its filing, and the Commission or Commission Staff can follow up and request the additional confidential or proprietary data as needed, after such information has been found to be confidential/proprietary by the Commission.

Third, IEA recommends that the information required to be filed pursuant to 170 IAC 4-7-2(c)(2)(C) be limited to only the input and output files from the capacity planning model, rather than all input and output files. Requiring all input and output files from all models mentioned in the IRP would result in an extremely large amount of data, and much of the information contained therein will likely not be of material importance. Accordingly, IEA suggests that the key input and output files of the capacity planning model be required to be submitted, and the Commission or Commission Staff can follow up and request additional confidential or proprietary data as needed.

Fourth, IEA suggests that the requirement for the user manual in 170 IAC 4-7-2(c)(2)(D) be deleted. IEA would note that some models may have interactive online help only, rather than a user manual; and many user guides are not kept up to date which could lead to stakeholder confusion. At a minimum, IEA suggests that this requirement be modified to require a user manual only to the extent one is available and is permitted to be provided by the license agreement between the utility and its model vendor.

Finally, IEA suggests that the wording of 170 IAC 4-7-2(c)(2)(E) be changed to reflect that revenue requirement calculations be provided for each portfolio, to the extent that such are not provided as an output file.

## **2. Public advisory process (170 IAC 4-7-2.6)**

The proposed changes to 170 IAC 4-7-2.6(b) would require utility responses to requests for information within 15 calendar days of a written request. Given weekends, holidays, etc., along with the complexity of IRP issues, the IEA suggests that this be modified to 15 business days or as otherwise mutually agreed to by the parties.

## **3. IRP updates (170 IAC 4-7-10)**

IEA suggests that 170 IAC 4-7-10(c) be modified to only require the updated sections of an updated IRP be filed (along with a document itemizing the portions that were updated). This change will reduce duplication in filings and will potentially significantly reduce the amount of paper and/or computer size of update filings. This change should also make it easier for the Commission and interested parties to focus on the utility's updates.

Please do not hesitate to contact the IEA at (317) 632-4406 if you have questions or need further information.