

Indiana Utility Regulatory Commission
Improving Procedural Efficiencies (“IPE”) – 2020 IPE Issues List

The following issues will be discussed as part of the 2020 Improving Procedural Efficiencies (“IPE”) initiative of the Indiana Utility Regulatory Commission (“IURC” or “Commission”):

I. In all docketed Proceedings:

- A. The Petitioner must provide supporting testimony, in addition to a petition.
- B. The Petitioner should provide more information in its case-in-chief, including, but not limited to:
 - 1) Visibly listing in the petition the estimated dollar amount and percentage increase for which cost recovery is being requested;
 - 2) Answers to questions asked in any pre-petition meetings with Commission staff, the Office of Utility Consumer Counselor (“OUCC”), and other potential parties; and
 - 3) Workpapers as Excel spreadsheets with formulas intact.
- C. An index of issues should be included:
 - 1) In cases in which the utility has more than 8,000 customers and the filing party has at least four witnesses providing testimony and at least two of those witnesses are providing testimony on the same issue(s);
 - 2) By all parties in cases that qualify under C(1) above; and
 - 3) Using the example of the Indiana Michigan Power Company rate case (IURC Cause No. 45235).
- D. All hearings and pre-hearing conferences may be conducted electronically:
 - 1) if no party objects; and
 - 2) at the discretion of, and determination by, the Presiding Officers, on a case-by-case basis.
- E. Proposed orders should:
 - 1) Provide facts used to support the findings and cite those facts, providing the exhibit name/designation and page number;
 - 2) Limit the recitation of facts to those that are the substantive evidence upon which the findings that support the ultimate conclusion(s) are based;
 - 3) Not contain any new evidence or new arguments (i.e., not submitted or made during evidentiary hearing); and
 - 4) Not include settlement agreements entered into after the record is closed.

II. Rate case proceedings:

- A. MSFRs should be amended to:
 - 1) Contain requirements for future test year;

- 2) Require workpapers, testimony, and schedules to be in the same order as listed in the MSFRs or index/references are provided, so the workpapers, testimony, and schedules can be located easily;
 - 3) Extend the timeline for review and requirements for completeness;
 - 4) Provide for a consequence for failure to file a complete case-in-chief (for example, the timeline for the rate case would not start until the filing of a complete case-in-chief as defined in the MSFR rule); and
 - 5) Possibly update technical requirements and eliminate those no longer necessary.
- B. Accounting Schedules – testimony and workpapers shall present three specific schedules – Sch. 1 Revenue Requirements, Sch. 4. Net Operating Income, and the Gross Revenue Conversion Factor in the format of municipal and investor-owned utility strawman schedules, which are posted on the Commission’s website for comment and feedback. Specifically, Sch. 4 *Pro Forma* statement should be detailed by each revenue and expense category. Every adjustment to revenues and expenses should at a minimum include the pro-forma, test year, and adjustment amounts, as well as reference(s) to where more detail of the calculation may be found. (Note: We understand that significant resources have been expended in the development of utility rate accounting schedules; therefore, in addition to the three required schedules, the utility may also submit their preferred style of accounting schedules containing all necessary items for the rate case.)

III. Pilot programs should:

- A. Provide necessary information;
- B. Describe the use of objective criteria for evaluation of the success or usefulness of the program;
- C. Allow for reasonable flexibility; and
- D. Include testimony regarding why the program benefits all of the utility’s customers, not just the participants (i.e., why it is in the public interest of all of the utility’s customers).

Issues not included in this year’s IPE initiative:

- Demand-side management and energy efficiency are being addressed through internal collaboration and through reporting requirements in orders in these docketed proceedings.
- As the decision-maker, it is not appropriate for the Commission to engage directly in settlement conferences, and the Commission does not have the resources or staffing to regularly designate and provide facilitation and/or mediation by IURC testimonial staff.
- Confidentiality concerns should be handled through non-disclosure agreements.
- Issues with CRM and filing should be handled pursuant to the User Manual; any possible changes will be recommended by the internal IURC Information Technology Governance Committee and determined based on Commission resources.
- Paper filings are required to save costs to the IURC; and CDs are required due to security protocols that do not allow flash drives and other technology recommendations.
- This IPE initiative is only about docketed proceedings, not the 30-day filing process.
- Parties may currently request technical conferences and attorney conferences in docketed proceedings.