



January 17, 2025

Steven Davies
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Indiana Utility Regulatory Commission
101 W. Washington St., Ste. 1500 East
Indianapolis, IN 46204
via email: URCComments@urc.IN.gov

Re: IURC RM #24-01

Advanced Energy United (“United”)¹ appreciates the opportunity to provide comment on the revised straw proposal concerning the Customer-Generator Interconnection Standards, 170 IAC 4-4.3, released on December 6, 2024. United generally supports the most recent edits to the straw proposal but notes one apparent scrivener’s error. Specifically, in Section 6(a)(2), the straw proposal increases the nameplate capacity threshold for Level 1 interconnection review from 10 kilowatts (“kW”) or less to 25 kW or less. United supports this increase but notes that in Section 4(a)(1)(A), the straw proposal continues to describe the Level 1 review procedures set forth in Section 6 as being applicable to facilities with a nameplate capacity of 10 kW or less. To avoid confusion and maintain consistency throughout the rule, United recommends that the apparent error in Section 4(a)(1)(A) be corrected by replacing “ten (10)” with “twenty-five (25).”

Concerning the substance of the proposed threshold increase, Indiana’s current 10 kW threshold for what constitutes a small facility is an outlier among its neighbors. Small facilities in Michigan are considered those sized up 20 kW (See Mich. Admin. Code, R 490.901b(e)), while in Illinois and Ohio, the threshold is 25 kW (See 83 Ill. Adm. Code 466.80(a) and Ohio Admin. Code §4901:1-22-06(A)(2), respectively). The rationale for increasing the threshold for what constitutes a small facility is also based on the fact that homes and small businesses are employing more electronic devices as well as more commonly adopting electric appliances.² Increasing the threshold for Level 1 interconnection review will enable more

¹ United is a national business association that educates, engages, and advocates for policies that allow its member companies to compete to power the economy with 100% clean energy. United’s members, which include several businesses operating in Indiana, are lowering consumer costs, creating thousands of new jobs every year, and providing the full range of clean, efficient, and reliable energy and transportation solutions.

² October 2024 sales data provided by the Air-Conditioning, Heating, and Refrigeration Institute available at <https://www.ahrinet.org/sites/default/files/2024-12/October2024StatisticalRelease.pdf>.

customers to meaningfully reduce their energy expenses and promote energy independence without incurring higher interconnection fees to do so.

United generally encourages the Indiana Utility Regulatory Commission to aid ratepayers in their efforts to lower their energy costs and enhance their energy security and resiliency through the adoption of policies that reflect the benefits of advanced energy technologies.

Signed,

/s/ John Albers

John Albers, Director
Advanced Energy United

