ADVANCED ENERGY UNITED

COMMENTS ON THE

CENTERPOINT ENERGY'S 2025 INTEGRATED RESOURCE PLAN

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Introduction:

Advanced Energy United ("United") respectfully submits these comments in response to CenterPoint Energy's ("CenterPoint" or "Company") 2025 Integrated Resource Plan ("IRP") submitted to the Indiana Utility Regulatory Commission ("Commission") on December 5, 2025. United appreciates the effort that CenterPoint and other

stakeholders have put into developing the 2025 IRP and emphasizes the importance of continuing to forecast and plan for Indiana's energy needs in the future. Indiana's utilities are at a critical juncture in planning for the State's future, facing a growing need to temper rising energy costs and a potential for exponentially higher load growth driven by new large load customers. United highlights that there are proven and readily available advanced energy technologies that can help address both of these concerns currently plaguing Indiana Utilities. By facilitating the deployment of advanced energy technologies, CenterPoint would be able to satisfy its obligation to cost effectively, reliably, and sustainably serve ratepayers and meet Hoosier's energy needs into the future.

United is the only national business association representing leaders in the advanced energy industry. Members include front-of-meter and behind-the-meter ("BTM") renewable energy and battery storage manufacturers and developers, electric vehicle ("EV") and EV charging equipment suppliers, providers of energy efficiency ("EE"), demand response ("DR"), and virtual power plants ("VPP"), as well as larger users of energy wanting to ensure that clean energy is available on the grid to facilitate corporate sustainability goals. United members work to enhance the United States' competitiveness and economic growth through an efficient, high-performing energy system that is clean, secure, affordable, and reliable. United works with decision-makers at the state and national level as well as regulators of energy markets to achieve this goal. In Indiana, United aims to drive the development of advanced energy by identifying growth opportunities, removing policy barriers, encouraging market-based policies, establishing partnerships, and serving as the voice of innovative companies in the advanced energy sector.

Although the Commission is unable to make direct changes to CenterPoint's 2025 IRP, United would like to identify some concerns with CenterPoint's IRP in the hope that the Director's Report in response to the IRP will encourage CenterPoint to improve its processes for developing future IRPs. The nine areas that United addresses in these comments are as follows: 1) Modeling Scenario Development and Portfolio Development, 2) Demand-Side Management Consideration, 3) Demand Response Aggregation Considerations, 4) the Distributed Generation ("DG") Incentive Program, 5) F.B. Culley 2 Conversion, 6) F.B. Culley 3 Conversion Considerations, 7) A.B. Brown Units 5 and 6 Conversion Considerations, 8) Fossil Fuel Supply Chain Risk and Capital Cost Assumptions, and 9) Large Load Customers: Load Considerations & Supply Flexibility. Each of these concerns is discussed in more detail within the "Key

Considerations and Recommendations" section of these comments. Silence regarding other aspects of CenterPoint's IRP should not be taken as support or acquiescence.

Background:

Indiana defines an IRP as "a utility's assessment of a variety of demand-side and supply-side resources to cost effectively meet customer electricity service needs".[1] As established in Indiana Administrative Code ("IAC") 170 4-7-2, each utility that owns generating facilities is required to submit an IRP to the Commission every three years.[2] CenterPoint has previously submitted IRPs to the Commission in 2020 and 2023 respectively. As mentioned in the Final Directors Report for CenterPoint's 2023 IRP, the purpose of an IRP is to "develop a long-term power system resource plan that will guide investments to provide safe and reliable electric power at the lowest delivered cost reasonably possible."[3] Furthermore, it is critical for IRPs to be flexible, as well as support the unprecedented pace of change currently occurring in the production, delivery, and use of electricity.

Following the submission of an IRP by a utility, the Commission does not have the authority to make direct changes to an IRP, however, as established in Indiana Code 8-1-8.5-3.3, "the director of the commission's research, policy, and planning division shall evaluate and comment in the commission's final director's report for the plan as to whether the electric utility's preferred resource portfolio takes into account the attributes of electric utility service including: 1) reliability; 2) affordability; 3) resiliency; 4) stability; and 5) environmental sustainability".[4] The Director's Report is a critical document, as it takes into account outside stakeholders' comments and serves as the main conduit for influencing and guiding utilities' future IRP proposals. The Final Director's Report for CenterPoint's 2023 IRP and subsequent stakeholder comments has therefore served as an informative resource when understanding CenterPoint's 2025 IRP.

In preparation for the 2025 IRP filing, CenterPoint engaged with stakeholders to receive feedback on the development of the IRP and hosted four public stakeholder meetings between March 2025 and October 2025 to promote transparency and

[1] *See* Indiana Administrative Code 170 17.1-2-11
[2] *See* Indiana Administrative Code 170 4-7-2
[3] *See* Final Director's Report for CenterPoint Energy Indiana South's 2022/2023 Integrated Resource Plan, May 14, 2024
[4] *See* Indiana Administrative Code 8-1-8.5-3.3

encourage feedback on the IRP process. In addition to the public advisory meetings, CenterPoint also hosted three technical meetings for stakeholders that signed a Non-Disclosure Agreement ("NDA") and were interested in the specific modeling assumptions, evaluation criteria, and technical details of the IRP process. CenterPoint accepted written thoughts and questions as well and ultimately submitted the IRP to the Commission on December 5, 2025.

CenterPoint's 2025 IRP – Overview:

CenterPoint's 2025 IRP indicates that the Company is susceptible to various market-wide transformations that are occurring or expected to occur in the near future, and the Company is proposing several actions (or in some cases non-actions) to mitigate the impacts of these changes and remain flexible in the face of volatility. As of 2025, the Company's annual energy requirement is 5,201,610 Megawatt-hours ("MWh") with a Summer peak demand of 1,083 Megawatts ("MW") and a Winter peak demand of 813 MW.[5] CenterPoint forecasts its energy load and peak demand to have relatively modest growth in the future with energy requirements increasing 0.3% per year, summer peak demand increasing 0.5% per year, and winter peak demand increasing 0.3% per year over the IRP planning horizon ending in 2045 with future demand-side management ("DSM") impacts removed from consideration.[6] The Company's forecasted energy requirements and demand include the impacts of customer-owned distributed generation ("DG"), EVs, trends in weather, company-owned DG, and customer energy efficiency ("EE") outside of CenterPoint's sponsored programs.[7] CenterPoint also developed three additional alternative scenario load forecasts to represent three different possible futures (low regulatory, high regulatory, and alternative high regulatory), by shifting model inputs on EV/DG forecasts, economics, and end-use saturation/efficiency. Furthermore, the Company developed additional forecasts based on varying levels of large load customer additions that CenterPoint could be subject to.[8] Including these additional load forecasts allows CenterPoint to better navigate a volatile future with regards to both regulatory policy and large load customer inclusion. These forecasts are shown below in **Figure 3-4, Figure 3-5, and Figure 3-6.**

[5] *See* CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 78
[6] *Ibid.*
[7] *Ibid.*
[8] *Id.* At Pg. 79

Figure 3-4 – Alternate Scenario Forecasts

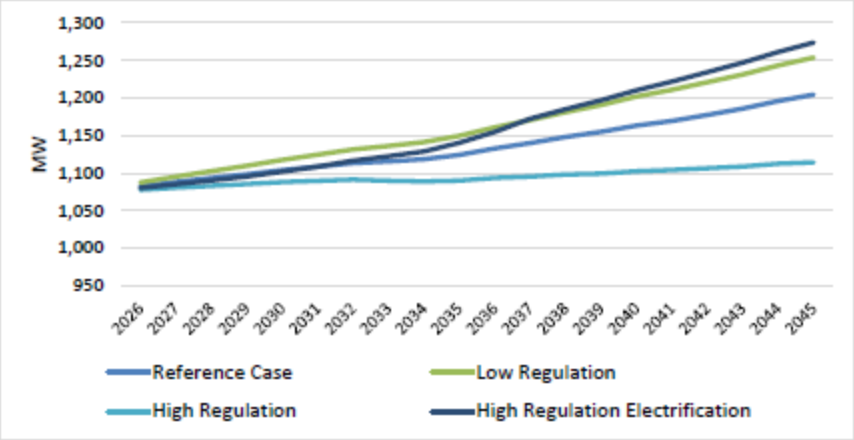


Figure 3-5 – Sensitivity Forecasts

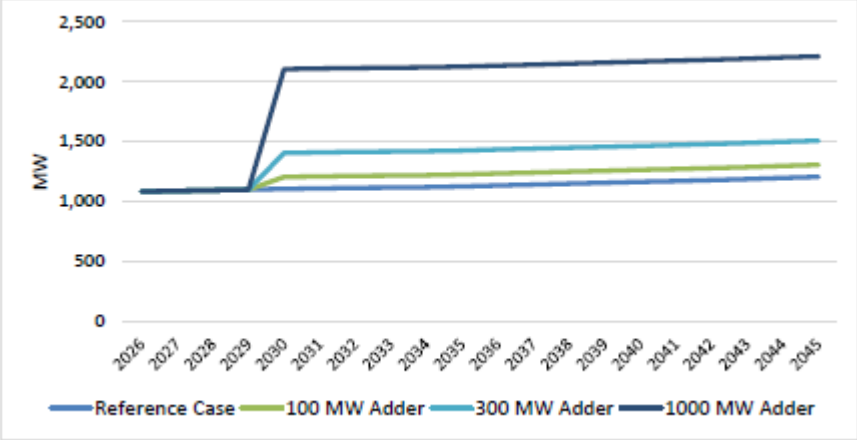
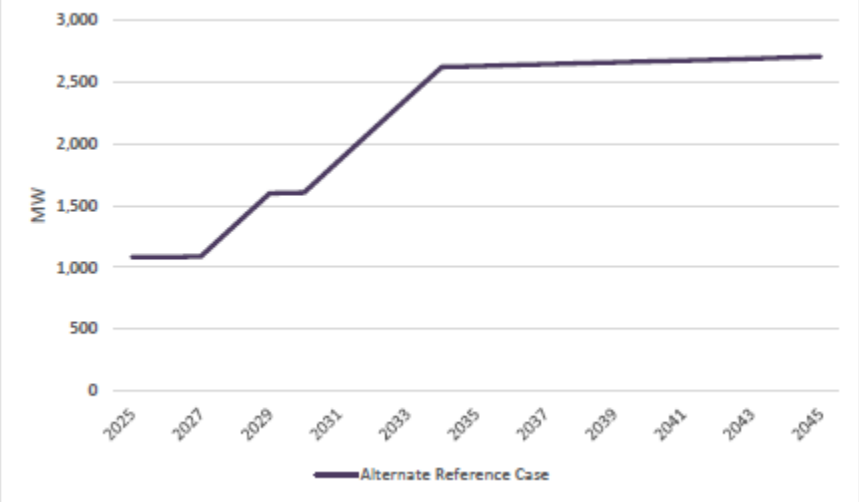


Figure 3-6 – Alternate Reference Case



In addition to the uncertain load and demand impacts due to an uncertain regulatory environment and large load customers, CenterPoint is also experiencing changes in its generation resource composition with the Company contemplating the retirement and conversion of its F.B. Culley 2 unit, its F.B. Culley 3 unit, as well as its A.B. Brown Units 5 and 6. F.B. Culley 2 is a 90 MW coal unit that officially retired at the end of 2025 and CenterPoint plans to transfer the interconnection rights to a 90 MW battery storage unit before the end of 2028 based on the results of a Request for Proposal ("RFP") conducted by the Company as well as the Company's previous IRP decisions.[9] F.B. Culley 3 is a 270 MW coal unit that, based on the decisions made in the Company's previous IRP, CenterPoint planned to retire and convert F.B. Culley 3's operations to natural gas by 2027. However, as part of the Company's short-term plan for the 2025 IRP, CenterPoint is rescinding this previous decision and is pausing F.B. Culley 3's conversion to natural gas due to increased change and uncertainty.[10] A.B. Brown units 5 and 6 are two 230 MW natural gas generating stations that both came online in 2025.[11] In CenterPoint's preferred portfolio, A.B. Brown units 5 and 6 are selected to be converted to a Natural Gas Combined Cycle ("NGCC") turbine by 2030.[12] These resources are discussed in greater detail in the sections below.

Since 2023, CenterPoint has also made a few changes to its IRP methodology, incorporating feedback from both the Commission and stakeholders following the 2023 IRP. These changes largely revolve around the DSM process including: 1) improved DSM modeling allowing cost-effective decision making across the short, mid, and long run (20-year period), and 2) improved selection of DSM resource bundles to include more emerging technologies across all sectors.[13]

Due to the various forms of uncertainty that the Company is experiencing, CenterPoint crafted five different IRP scenarios to represent a distinct set of assumptions related to environmental regulation, federal policy, demand growth, fuel pricing, capital costs, and technology adoption. The five different IRP scenarios are as follows: 1) Reference Case representing CenterPoint's best estimate of future conditions, 2) Alternate Reference case that is inclusive of substantially higher load growth, 3) High Regulatory

[9] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 190
[10] *Id.* At Pg. 189
[11] *Ibid.*
[12] *Id.* At Pg. 185
[13] *Id.* At Pg. 123

that assumes tighter compliance obligations under the Clean Air Act and other environmental statutes as well as a carbon price, 4) Alternate High Regulatory that assumes tighter compliance obligations with environmental statutes without the use of a carbon price, and 5) Low Regulatory that assumes Clean Air Act 111 (b) and (d) are repealed and no new decarbonization mandates are introduced.[14] Of note, the Alternate Reference case is the only IRP scenario that used a sensitivity analysis on the potential impacts of large load customer additions by including additional load into the scenario in 250 MW increments until overall load reaches 1,500 MW.[15] CenterPoint utilized these five IRP scenarios to develop resource portfolios that represent long-term resource pathways to meet future energy needs and are centrally focused on three major decisions within CenterPoint's business: 1) replacement of the F.B. Culley 2 interconnection, 2) the next three-year DSM plan, and 3) the evaluation of F.B. Culley 3.[16] Utilizing deterministic and probabilistic modeling as well as the EnCompass capacity expansion model, CenterPoint developed 12 final resource portfolios which were then assessed using evaluation metrics based on Indiana's five pillars.[17] CenterPoint additionally utilized sensitivity analyses to explore the effects of several factors on portfolio performance such as: distributed solar incentives, large load additions, A.B. Brown 5 and 6 conversion costs, inclusion of an F.B. Culley 2 storage resource, demand response, as well as the alternate low regulatory scenario.[18] **Figure 4-5** shows a description/genesis of the 12 portfolios and **Figure 4-8** shows the evaluation of the 12 portfolios.

[14] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 61
[15] *Id.* At Pg. 179
[16] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 66
[17] *Id.* At Pg. 146
[18] *Id.* At Pg. 73

Figure 4-5 – Description of Portfolio Motivations

Portfolio Name	Motivation
2-Convert FB Culley 3 to NG by 2035	Deterministic Portfolios (economically optimized model given fixed existing site decisions and potential replacement options for F.B. Culley 3)
3-Continue FB Culley 3 on Coal through 2045	
5-FB Culley 3 to Simple Cycle Gas Turbine	
11-FB Culley 3 Co-Fire	
12-Delayed Reference Case	
1-Reference Case Portfolio	Scenario-Based Portfolios (economically optimized model for each scenario)
8-Low Regulatory Approach	
9-High Regulatory Approach	
10-Alternate High Regulatory Approach	
4-FB Culley 3 to Small Modular Reactor	Stakeholder Input Portfolios
6-Renewable Heavy	
7-FB Culley 3 Gas Conversion with Renewables	

Figure 4-8 – IRP Portfolio Balanced Scorecard Color-Coded Comparison

Objective	Affordability					Environmental Sustainability				Reliability/Resiliency/Stability					Risk/Other			
Portfolio Description	20 Year NPVRR ($M)	Delta From Reference (%)	5% Value of NPVRR ($M)	95% Value of NPVRR ($M)	Incremental Energy Burden (%) 2030 - 2035	CO_2 Intensity (Tons CO_2e/MWh)	CO_2 Equivalent Emissions (Stack Emissions) (1000s Tons CO_2e)	SOx Emissions (Tons)	NOx Emissions (Tons)	Unserved Energy (MWh)	Spinning Reserve (MW)	Fast Start Capability (MW)	Transmission Reliability Analysis MVAR	Transmission Reliability Analysis SCR	Energy Market Sales (%)	Energy Market Purchases (%)	Capacity Sales NPV ($M)	Capacity Purchases NPV ($M)
2-FBC3 NG 2035	$3,718	0%	$2,941	$4,464	0.13% - 0.22%	0.368	48,696	18,017	13,091	119	1,031	253	753	3.5	26%	9%	$217	$6
1-Reference Case	$3,726	0%	$2,963	$4,439	0.11% - 0.25%	0.346	44,302	12,877	10,650	61	842	340	665	3.5	26%	10%	$140	$14
8-Low Reg	$3,764	1%	$2,983	$4,475	0.15% - 0.20%	0.345	44,199	12,908	10,582	49	842	366	665	3.5	26%	10%	$167	$6
12-Delayed Reference	$3,836	3%	$3,195	$4,467	0.16% - 0.26%	0.391	46,535	21,885	14,539	56	701	444	665	3.5	23%	12%	$115	$18
11-FBC3 Co-Fire	$3,854	3%	$3,064	$4,587	0.18% - 0.17%	0.354	46,317	14,397	11,812	61	937	308	753	3.5	26%	10%	$192	$12
3-FBC3 on Coal	$4,034	8%	$3,511	$4,630	0.03% - 0.29%	0.522	53,636	51,793	25,931	43	302	835	626	3.5	15%	19%	$117	$22
10-Alt High Reg	$4,211	13%	$3,444	$4,829	0.17% - 0.48%	0.280	34,415	14,226	10,985	29	660	486	665	3.5	25%	9%	$159	$19
9-High Reg	$4,297	15%	$3,543	$4,926	0.43% - 0.44%	0.234	25,913	13,701	12,322	15	113	935	605	3.5	20%	14%	$128	$23
5-FBC3 to SCGT	$4,306	16%	$3,857	$4,770	0.14% - 0.59%	0.408	41,016	22,763	16,698	73	154	955	665	3.5	14%	21%	$93	$26
6-Renewable Heavy	$4,309	16%	$3,756	$4,723	0.10% - 0.62%	0.329	28,966	14,385	14,597	38	113	985	605	3.5	11%	30%	$95	$22
7-FBC3 NG with Renewables	$4,375	17%	$3,912	$4,771	0.26% - 0.49%	0.357	34,642	8,289	18,780	76	302	802	626	3.5	14%	23%	$106	$24
4-FBC3 to SMR	$4,456	20%	$3,674	$5,185	0.15% - 0.76%	0.342	45,224	18,653	11,950	52	938	273	665	3.5	26%	9%	$171	$13

CenterPoint ultimately selected both a preferred portfolio and an alternative preferred portfolio that will be used to develop a short-term plan that will guide resource acquisition in the near term through 2028.[19] CenterPoint's selected preferred portfolio is based off of the Delayed Reference Case portfolio which uses the reference case scenario while also delaying the decisions on A.B. Brown unit 7 and F.B. Culley 3.[20] CenterPoint's alternative preferred portfolio represents the reference case portfolio,

[19] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pgs. 165 and 185

[20] *Id.* At Pg. 165

however, utilizes forecasting and assumptions that load will increase in 250 MW increments until it reaches 1,500 MW, which is indicative of a large load customer coming online in CenterPoint's service territory.[21]

CenterPoint's preferred portfolio includes the following resource decisions: 1) a 90 MW energy storage system at F.B. Culley 2 by 2028, 2) the conversion of A.B. Brown 5 and 6 to a NGCC turbine in 2034, 3) the retirement of F.B. Culley 3 by 2035, 4) 100 MW of storage resources between 2040 and 2045, and 5) 46 MW of DSM capacity in the first year of the study period with 156 MW of DSM capacity by 2045.[22] CenterPoint's alternate preferred portfolio (with the assumption that a substantial load increase will occur as previously stated) includes the following resource decisions: 1) a 90 MW energy storage system at F.B. Culley 2 by 2028, 2) the conversion of A.B. Brown 5 and 6 to an NGCC turbine in 2030, 3) maintaining F.B. Culley 3 throughout the entirety of the IRP period, 4) adding an additional large NGCC in 2032, 5) adding an additional small simple cycle natural gas unit in 2035, 6) the procurement of an additional 150 MW of standalone storage in 2035, 7) an additional hybrid wind plus storage facility brought online around 2040, and 7) 46 MW of DSM capacity in the first year of the study period with 118 MW of DSM capacity by 2045.[23] CenterPoint notes that, currently, no contract has been executed to secure a large load customer, however, the Company will continue ongoing conversations with prospective customers.[24]

The two preferred portfolios utilized by CenterPoint led to the development of the Company's short-term plan which outlines the near-term decisions that CenterPoint intends to make in the next few years (through 2028). Regarding F.B. Culley 3, despite CenterPoint selecting a portfolio that converted F.B. Culley 3 to natural gas by 2027 in its previous 2023 IRP, the Company has determined to pause this conversion and not take action on F.B. Culley 3 in its 2025 IRP.[25] CenterPoint's reasoning for this decision is due to market uncertainty and because "while coal to gas conversion may make sense in the future, it does not today" and that CenterPoint will reevaluate the conversion of F.B. Culley 3 in its next IRP.[26] Regarding F.B. Culley 2, CenterPoint has

[21] *Id.* At Pg. 179
[22] *Id.* At Pg. 165
[23] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pgs. 179, 184, and 185
[24] *Id.* At Pg. 186
[25] *Id.* At Pg. 189
[26] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 189

placed the F.B. Culley 2 unit in suspension with plans to transfer the interconnection rights to a 90 MW battery storage unit by the end of 2028, and will utilize the results a prospective storage RFP to further evaluate the economics of this option before filing for a Certificate of Public Convenience and Necessity ("CPCN") to carry out this action.[27] The Company also has the 170 MW Galesburg Wind Power Purchase Agreement ("PPA") expected to come online in 2026, as well as the 150 MW Wheatland Solar PPA expected to come online at the end of first quarter of 2026.[28] Additionally, CenterPoint aims to have EE programs save 1.1% of eligible retail sales consistent with its 2025-2027 DSM plan, and anticipates an effective 5-year DR aggregation pilot with C&I customers led by Enel X as the program administrator.[29] The specific details of CenterPoint's short-term plan are discussed in greater detail in the sections below and outlined in **Figure 7-1** below.

Figure 7-1 - Implementation Schedule

Timing	Activity Type	Actions
Q3 2025	Demand Response	Initiation of DR aggregator program
Q1 2026	Generation Transition	Salt Creek Wind (170 MW PPA) online Wheatland Solar (150 MW PPA) online
Q1 – Q2 2026	Storage RFP	Conduct an RFP for storage at F.B. Culley 2. If determined to be affordable, submit a Certificate of Public Convenience and Necessity (CPCN) for 90 MW battery storage in Q3.
Q1 – Q2 2026	Demand Response	Planned implementation of DR aggregator program
Q2 2026	Rate Design	Planned implementation of TOU CPP Pilot program
Q2 – Q3 2026	Generation Transition	Galesburg Wind (147 MW PPA) online
Q1 – Q2 2027	DSM Plan	File a 3-year DSM plan for 2028 through 2030 informed by the 2025 IRP in the first half of 2027
Ongoing	Large Load Addition	Continue to work through due diligence for possible large load addition

Key Considerations and Recommendations:

United has reviewed CenterPoint's 2025 IRP and appreciates the work that CenterPoint invested in the process. Nevertheless, United has identified areas of concern within the 2025 IRP and provides the following general considerations on the IRP as a whole, as well as specific recommendations and analysis on the individual topics mentioned below.

[27] *Id.* At Pg. 90
[28] *Id.* At Pg. 190
[29] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 190

1. *Modeling Scenario Development and Portfolio Development*

   As discussed in the previous section, CenterPoint engaged in a robust process to craft its various modeling scenarios that are ultimately used to develop multiple different resource portfolios which are eventually evaluated using specific portfolio scoring measures to determine the "preferred resource portfolio". One of the modeling scenarios that CenterPoint developed is the "Low Regulatory" scenario which represents a future where Clean Air Act (CAA) 111(b) and (d) are repealed, no new decarbonization mandates are introduced, Inflation Reduction Act (IRA) provisions are cancelled, and resource decisions are largely driven by market forces.[30] CenterPoint further states that "this scenario helps identify portfolios that remain viable in policy-light conditions with limited external drivers for transition".[31] In other words, United understands this scenario to be indicative of a future with little to no regulatory and legislative oversight regarding resource decisions and greenhouse gas emission reductions. CenterPoint, when discussing Greenhouse Gase regulations, however, states that, "We believe it is unlikely that we will cease to have any regulatory requirements applicable to greenhouse gas emissions from fossil fuel-fired generating units".[32] Ultimately, it appears that CenterPoint contradicts itself by stating that regulatory requirements applicable to greenhouse gas emissions from fossil fuel-fired generating units will likely exist in the future, while at the same time developing a modeling scenario that assumes the opposite. Overall, United questions why CenterPoint developed this aggressive "Low Regulatory" scenario given its statements on the future of greenhouse gas emission reductions, and ultimately recommends that CenterPoint discontinue the development of this modeling scenario in future IRPs.

2. *Demand-Side Management Considerations*

   In accordance with the IURC's Rule 170 IAC 4-7-6(b), CenterPoint is required to incorporate demand-side resources into its IRP and integrate a set of DSM options that can be utilized as selectable alongside supply-side resources.[33] To accomplish this, CenterPoint worked with the consultant GDS to develop a

[30] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 61
[31] *Ibid.*
[32] *Id.* At Pg. 94
[33] *Id.* At Pg. 115

Market Potential Study ("MPS") in order to identify the best opportunities to utilize EE and DR savings opportunities in the residential, commercial and industrial customer classes, which can then be used to determine the types of programs that should be implemented and invested in.[34] The results of an MPS are bifurcated by: 1) a Maximum Achievable Potential representing maximum adoption rates and incentives equal to 100% of the incremental costs to implement the program, and 2) a Realistic Achievable Potential representing expected adoption rates and incentive levels based on historic data.[35] The EE and DR programs are then adapted into bundles of the various DSM programs that CenterPoint operates and modeled as a selectable resource within the EnCompass capacity expansion utilized by the Company for portfolio development.[36] Of note, CenterPoint utilized EE and DR costs that have been adjusted to net out avoided transmission and distribution costs because the EnCompass capacity expansion model does not calculate these costs.[37] Adjustments were also made to convert achievable potential of DR and EE from gross savings and provide savings at the generator level. In total, CenterPoint utilized 12 different annual selectable bundles of EE and DR across 3 different time-series.[38]

Ultimately, CenterPoint's preferred portfolio and the alternate preferred portfolio chose to continue the Company's current EE programs targeting energy savings of 1.18% over the next 6 years and 1.17% over the following 14 year period.[39] Additionally, CenterPoint chose to continue its current DR programs and selected the following programs: the Direct Load Control residential AC switch program, the residential bring your own thermostat ("BYOT") program, the approved DR aggregation program, the Critical Peak Pricing Time-of-Use rate program, as well as a new commercial BYOT program that will be introduced.[40] CenterPoint stated that it will file a 3-year DSM plan in 2027 consistent with the EE savings identified within the 2025 IRP.[41] In reviewing

[34] *Id.* At Pg. 116
[35] *Id.* At Pg. 117
[36] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 118
[37] *Id.* At Pg. 119
[38] *Id.* At Pg. 120
[39] *Id.* At Pg. 166
[40] *Ibid.*
[41] *Id.* At Pg. 190

CenterPoint's IRP, United notes that it is unclear the specific bundles that the Company selected within its preferred portfolio, as well as the total level of MW for DSM resources that the Company has selected. United posits that this is shortcoming of CenterPoint's 2025 IRP as DSM should be properly considered as an eligible resource to accommodate the Company's forecasted load especially during a time of market uncertainty and the anticipation of large load growth. Furthermore, United urges CenterPoint to consider growing its EE and DR programs to achieve greater savings, as opposed to continuing the current programs in perpetuity as provided in the Company's 2025 IRP. For comparison, United notes that AES Indiana's 2025 IRP preferred portfolio selected 150 MW of firm capacity in DR programs and 130 MW of EE program savings, while growing these programs over time and including new potential programs.[42] Specifically, AES Indiana noted that, absent new large load customers coming online within its service territory, it would be able to meet a majority of its forecasted load growth through the use of the selected EE and DR bundles.[43] Furthermore, United recommends that CenterPoint consider ways to properly consider avoided transmission and distribution costs within an IRP (even if a capacity expansion model does not account for this), on the grounds that avoided transmission and distribution costs are extremely relevant to the applicability and success of EE and DR resources. Overall, United recommends that in future IRPs, CenterPoint give greater consideration to EE and DR programs towards meeting forecasted load growth.

3. *Demand Response Aggregation Considerations*

As selected within CenterPoint's preferred portfolios and prospectively executed in the short-term plan, the Company has signed a contract with Enel X to add commercial and industrial demand response resources through an approved Aggregation Demand Response rider.[44] The Company states that 12 MW were included in the preferred portfolio increasing to 25 MW in 2027, and CenterPoint has received letters of authorization to begin sharing meter data for potential

[42] *See* AES Indiana's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on October 31, 2025
[43] *Id.* At Pg. 262
[44] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 167

enrollment from 20 customers with 5 customers signing contracts.[45] This Aggregation Demand Response rider was launched in September 2025 as a 5-year contract with Enel and will be ongoing until it is re-evaluated in 2030.[46] Furthermore, it is noted by CenterPoint that following a June 10, 2021 MISO curtailment event, the Company lost its largest interruptible commercial and industrial customer of 30 MW, as the customer chose to no longer participate in the interruptible tariff after the event.[47] United, recommends that CenterPoint work with Enel to try to entice this customer that no longer participates in the interruptible program to potentially participate in the Aggregation Demand Response program. In general, United strongly supports CenterPoint's implementation of this DR Aggregation program and notes the importance of utilizing aggregated DR resources to accommodate energy needs and mitigate issues associated with prospective load growth and market volatility. United, however, recommends that CenterPoint consider expanding this program to include more aggregation companies like Enel and include additional types of DR programs aside from those attributed to commercial and industrial customers. United further notes the importance of coalescing DR aggregation programs and the consideration of such programs with prospective DER aggregation implementation in accordance with FERC Order No. 2222.

4. *Distributed Generation ("DG") Incentive Program*

When evaluating DG resource portfolios, CenterPoint evaluated a potential DG solar incentive program with the stated intent of encouraging customers to install BTM solar resources, thus reducing system energy requirements.[48] Working with Itron, the Company modeled a $500/kW incentive, which would reduce non-coincident system load by 137 MW by 2045, while increasing the net present value of revenue requirements by $34.6 million.[49] CenterPoint ultimately did not include this DG incentive as the Company concluded that the reduced energy requirements from the incentive would not change resource

[45] *Id.* At Pg. 167 and 189
[46] *Id.* At Pg. 190
[47] *Id.* At Pg. 102
[48] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 142
[49] *Ibid.*

requirements because long-term planning needs are driven by capacity, and cost savings from reduced operational costs were insufficient to offset the cost of the program with the optimized DG portfolio being ~$10 million greater than the reference case portfolio.[50] United disagrees with CenterPoint's exclusion of a DG incentive as a way to reduce system load, and recommends that CenterPoint consider and enact a DG incentive in future IRPs. In an economic sector that is currently being impacted by market volatility and uncertainty surrounding the addition of substantial large load customers, electric utilities should utilize all available actions that can be used to mitigate these potential negative impacts. An estimated 137 MW reduction of non-coincident system load by 2045 is not insignificant when utilities are currently seeking all possible options to mitigate a substantial increase in load in the future. Furthermore, with DER aggregation implementation set to begin in the coming years due to the passage of FERC Order No. 2222, DG resources can be further utilized to provide capacity needs of a utility, which is an additional benefit that CenterPoint didn't consider when contemplating this DG incentive. Overall, United believes that a DG incentive is worthwhile to help reduce system energy requirements and should be considered and implemented by CenterPoint in future IRPs.

5. *F.B. Culley 2 Conversion*

As determined by the preferred portfolio and the alternative preferred portfolio, and outlined within the short-term plan, CenterPoint has suspended the operation of F.B. Culley 2 with plans to transfer the interconnection rights to a 90 MW battery storage unit before the end of 2028.[51] The Company states that it evaluated four different options for F.B. Culley 2, 1) replacement with 91.5 MW of natural gas ("NG") reciprocating engines, 2) replacement with 104.4 MW of NG aeroderivative engines, 3) replacement with a 90 MW 4-hour lithium-ion battery storage system, or 4) expiration without reuse of the interconnection.[52] Capital costs associated with a storage resource at F.B. Culley 2 were informed by CenterPoint's 2024 All-Source RFP that was issued, and the results shown in the 2025 IRP highlight that replacement of F.B. Culley 2 with a storage resource

[50] *Ibid.*
[51] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 190
[52] *Id.* At Pg. 105

is the lowest cost solution.[53] Despite the overwhelming cost-effectiveness and ultimate determination to replace F.B. Culley 2 with a storage resource, CenterPoint has stated that before executing this plan and filing for a CPCN for a storage resource, the Company will analyze the results of RFPs for capacity and for a new RFP for battery storage to further evaluate the economics and reliability attributes of this option relative to purchasing required capacity to maintain reliability.[54] United understands the need to conduct and RFP for a battery storage resource in order to actually select the specific resource that will replace F.B. Culley 2, however, United disagrees with CenterPoint's stated need for further evaluation to assess this option. United strongly agrees with CenterPoint's selection of a storage resource to replace F.B. Culley 2 and asserts that a storage resource will likely continue to be the most cost-effective resource to replace F.B. Culley 2. United believes that there is no need to evaluate purchasing further capacity, especially during a time of volatile and high capacity market prices, and recommends that CenterPoint confirm its plans and move quickly to construct an energy storage resource that will replace F.B. Culley 2.

6. *F.B. Culley 3 Conversion Considerations*

As determined by the preferred portfolio, the alternative preferred portfolio, and outlined within the short-term plan, CenterPoint is deciding to make no decision on F.B. Culley 3's conversion or retirement at this time and postpone a decision on F.B. Culley 3 until the Company's next IRP. For the 2025 IRP, it is stated that CenterPoint considered three possible options for the future of F.B. Culley 3 including: continued operation on coal until retirement in 2031 or 2034, conversion to operating on NG by 2030 and 2035, or co-fire with 40% NG in 2030 with retirement in 2038.[55] Ultimately, CenterPoint's preferred portfolio and alternative preferred portfolio selected to either continue the use of F.B. Culley 3 until its retirement in 2035 or converting F.B. Culley to natural gas

[53] *Ibid.*
[54] *Id.* At Pg. 190
[55] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 105

use.[56] It is crucially important to note, however, that CenterPoint's previous 2023 IRP selected and decided to convert F.B. Culley 3 to NG use by 2027.[57]

United is strongly opposed to CenterPoint making no decision on F.B. Culley 3 at this time and ultimately punting any action on F.B. Culley 3 until its next IRP. Firstly, this decision reverts the decision that CenterPoint had made in its previous 2023 IRP regarding F.B. Culley 3 converting to natural gas by 2027, which creates uncertainty and confusion for decisionmakers and stakeholders regarding CenterPoint's long-term business plans. Secondly, CenterPoint considered an incredibly small set of options for the retirement and conversion of F.B. Culley 3 limited to either the continued use of coal until retirement or the conversion to natural gas use. CenterPoint failed to consider any other resource options in its 2025 IRP that would be potentially more cost-effective such as storage, solar+storage, wind, increased DSM utilization, or even nuclear. United views this lack of consideration of other resources as short-sighted, and recommends that CenterPoint consider a full suite of resources to replace F.B. Culley 3 in future IRPs. Furthermore, with the Company making no decision on F.B. Culley 3 at this time, CenterPoint is committing to the continued use of a resource that is inefficient, expensive, subject to a volatile fuel source market, and emits a substantial amount of pollution (which is discussed in greater detail in the sections below). For these reasons, United strongly disagrees with CenterPoint's decision pertaining to F.B. Culley 3.

7. *A.B. Brown Units 5 and 6 Conversion Considerations*

A.B. Brown Units 5 and 6 collectively represent 460 MW of Natural Gas Combustion Turbines that have come online in August 2025 and May 2026 respectively to replace the aging A.B. Brown Coal units 1 and 2 at a cost of ~$287 million.[58] Within both the preferred portfolio and the alternative preferred portfolio, CenterPoint selected to convert A.B. Brown 5 and 6 to a collective 850 MW NGCC turbine either by 2030 or to a "2X1" NGCC by 2034.[59] CenterPoint

[56] *Id.* At Pg. 165 and 179
[57] *Id.* At Pg. 189
[58] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pgs. 15 and 189
[59] *Id.* At Pgs. 165 and

states that this conversion would improve thermal efficiency, increase generation capacity, and transition the resource to be a baseload resource, however, the costs of the conversion will range between $950/kW and $1,050/kW for capital expenditures, $6.2 million per year in fixed operation and maintenance costs, $37.7 million per year in gas transportation costs, and $1.5 million per MWh in variable operation and maintenance costs.[60] These costs are further highlighted in **Figure 3-25** shown below. United has concerns regarding CenterPoint's potential decision to convert A.B. Brown 5 and 6 in the near future which would be very expensive especially with regards to how soon this conversion would come following the ~$287 million completion of A.B. Brown 5 and 6 in 2025. United notes that this expensive conversion could exacerbate customer affordability concerns in CenterPoint's service territory especially when more cost-effective advanced energy technologies exist that could provide CenterPoint with a base load resource without the need to convert the recently constructed A.B. Brown 5 and 6 units. United therefore recommends that CenterPoint consider different cost-effective advanced energy base load resources in lieu of converting A.B. Brown 5 and 6 in its future IRPs.

Figure 3-25 – A.B. Brown Potential Future Conversion Options

Operating Characteristics and Estimated Costs	2x1 F Class SCGT to CCGT Conversion, Unfired	2x1 F Class SCGT to CCGT Conversion, Fired
Base Load Net Output (MW)	735	734
Base Load Heat Rate (HHV Btu/MWh)	6,430	6,440
Duct Fired Net Output (MW)	N/A	893
Duct Fired Heat Rate (HHV Btu/MWh)	N/A	6,830
Capital Expenditures (2025$/kW)	$1,050	$950
Fixed O&M (2025$MM/yr)	$6.2	$6.2
Gas Transportation Costs (2025$MM/yr)	$37.7	$37.7
Variable O&M (2025$/MWh)	$1.5	$1.5

8. *Fossil Fuel Supply Chain Risk and Capital Cost Assumptions*

As discussed extensively in previous sections, CenterPoint has selected preferred portfolios and made decisions that rely heavily on the use of fossil fuels such as coal and natural gas generators in both the near-term and long-term. Specifically, CenterPoint's preferred portfolios continue the use of F.B.

[60] *Id.* At Pg. 107

Culley 3 for coal generation, propose for the conversion of A.B. Brown 5 and 6 to an NGCC turbine in 2030, as well as adding an additional large NGCC and an additional small simple cycle natural gas unit under the alternative preferred portfolio. United disagrees with CenterPoint's selection (and decision) to continue utilizing coal and natural gas resources rather than shifting towards cleaner alternatives. Specifically, advanced energy technologies such as utility-scale wind and solar projects can replace the need for gas turbines and replace plant retirements in a cleaner and more cost-effective manner. Furthermore, United asserts that there is a large amount of uncertainty within the natural gas turbine supply chain currently which creates risk regarding CenterPoint's ability to construct a natural gas turbine in the near future. Recent industry reports from both Power Engineering and S&P suggest that wait times for gas turbine equipment is currently between seven or eight years and equipment costs have increased dramatically in recent years.[61] [62] Furthermore, a report from Lawrence Berkeley National Laboratory shows that the average processing time from interconnection request to an interconnection agreement is nearly 40 months for MISO and over 40 months for PJM.[63] This information indicates that the time to receive an interconnection agreement and receive gas turbine equipment could add up to over 10 years, making the construction of a natural gas steam turbine tumultuous to consider in 2026 and years after. Furthermore, natural gas plants are highly susceptible to changes in fuel price. Beyond an anticipated increase in fuel price (as the EIA projects average gas prices will increase to nearly $5/MMBtu in 2027), recent extreme weather events have highlighted the cost risks of an overreliance on natural gas.[64] During the recent nationwide cold snap in January 2026, certain regions of the country experienced the magnitude of these risks, as natural gas prices increased 63% in the week prior to Winter

[61] Power Engineering article 'Long lead times are dooming some proposed gas plant projects' by Kevin Clark on February 20, 2025 available here: https://www.power-eng.com/gas/turbines/long-lead-times-are-dooming-some-proposed-gas-plant-projects/

[62] S&P Global article 'US gas-fired turbine wait times as much as seven years; costs up sharply' by Jared Anderson on May 20, 2025 available here: https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply

[63] Berkeley Lab "Queued Up: 2025 Edition, Characteristics of Power Plants Seeking Transmission Interconnection As of the End of 2024" Published in December 2025 available here: https://emp.lbl.gov/publications/queued-2025-edition-characteristics

[64] EIA article 'Short-Term Energy Outlook' on February 10, 2026 available here: https://www.eia.gov/outlooks/steo/report/natgas.php

Storm Fern and power prices spiked up to $700/MWh in PJM, largely due to restricted gas supply. [65] [66]

Furthermore, United has concerns regarding the general capital cost assumptions that CenterPoint makes within its IRP on various different energy technologies, especially assumptions on solar and natural gas capital expenditures. **United Table 1** below shows the capital cost assumptions that Indiana utilities have made in recent IRPs, and United notes that CenterPoint's solar capital cost assumptions are higher than 3 out of the 4 other utilities and it's natural gas CT assumptions are lower than 3 out of the 4 other utilities. United understands that, regarding capital costs, CenterPoint states, "where available baseline resource capital costs were developed utilizing a blend of All-Source RFP results and National Renewable Energy Laboratory ("NREL") Annual Technology Baseline ("ATB") curves, with adjustments made for inflation and supply chain constraints".[67] United appreciates CenterPoint's use of NREL ATB information to develop cost assumptions, however, notes that it is unclear to what extent this information was used in conjunction with the All-Source RFP, inflation, and supply chain constraints. This beckons the question of how realistic some of CenterPoint's capital cost assumptions are especially given that these assumptions are quite different from the other Indiana utilities' assumptions. United therefore recommends that CenterPoint provide a detailed explanation into how NREL ATB values are incorporated into CenterPoint's capital cost assumptions in future IRPs, and recommends that CenterPoint give greater deference to NREL ATB values when making capital cost assumptions on the ground that NREL ATB is widely used and respected in the market.[68]

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[65] WSJ article 'Natural-Gas Prices Soar as U.S. Braces for Arctic Blast' by Ryan Dezember and Jennifer Hiller available here: https://www.wsj.com/us-news/natural-gas-prices-arctic-blast-6542d0a8

[66] Reuters article ' Power plant outages surge in Eastern US amid restricted gas supplies and frigid weather' by Tim McLaughlin and Arathy Somasekhar on January 26, 2026 available here: https://www.reuters.com/business/energy/power-prices-surge-winter-storm-spikes-demand-us-data-center-alley-2026-01-25/

[67] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 59

[68] 2024 NREL ATB Assumptions on Utility-Scale Solar are available here: https://atb.nrel.gov/electricity/2024/utility-scale_pv and 2024 NREL ATB Assumptions on Fossil Energy Technologies are available here: https://atb.nrel.gov/electricity/2024/fossil_energy_technologies

United Table 1: Capital Cost Assumptions by Utility & Fuel Type[69]

Fuel Type	AES IN 2025 ($/kW)	CenterPoint 2025 ($/kW)	NIPSCO 2024 ($/kW)	I&M 2024 ($/kW)	Duke IN 2024 ($/kW)
Solar	1,731	2,351	2,092	2,500	1,800
Wind	3,331	2,194	2,248	3,000	2,000
Storage	2,024	2,273	1,612	2,000	2,150
Solar + Storage	--	3,491	--	3,100	--
CCGT	2,629	2,039	1,225	1,100	1,180
CT	1,546	1,190	1,284	1,500	1,000

CenterPoint should also be transparent about potential costs of keeping F.B. Culley 2 and 3 open if directed to do so under an Emergency Order, as was experienced by Northern Indiana Public Service Company ("NIPSCO"). In the case of NIPSCO, the first 90-day extension of NIPSCO's Schaefer units is expected to cost ratepayers $20.6 million in operating costs and an additional $33.7 million to replace old equipment.[70] A similar order could impact the F.B. Culley 2 and 3 plants and CenterPoint should be proactive about communicating the total costs that would be passed on to ratepayers. Ultimately, United recommends that CenterPoint push back on an emergency order, if it were to come, and take a similar stance as recently seen by utilities in Colorado, who emphatically responded by detailing the poor economics of keeping open aging

[69] These values were taken from each utility's respective most recent IRP filings and midpoints values were utilized when ranges of values were provided by the utility. Recent utility IRP filings are available here: https://www.in.gov/iurc/energy-division/electricity-industry/integrated-resource-plans/

[70] RTO Insider article 'MISO Stakeholders Should Decide Cost-sharing for DOE Coal Plant Orders' by Amanda Durish Cook available here: https://www.rtoinsider.com/124375-regulators-miso-community-decide-cost-sharing-coal-plants-emergency-extension/

coal plants, where replacement plans are already in place.[71] The added costs of keeping inefficient coal plants online will undermine CenterPoint's emphasis on affordability and lead to unnecessary costs borne by ratepayers.

9. *Large Load Customers: Load Considerations & Supply Flexibility*

As discussed in detail above, CenterPoint has taken the unique approach in its 2025 IRP to develop two preferred portfolios which hinge solely on whether or not large load customers come online in CenterPoint's service territory (the preferred portfolio and the alternative preferred portfolio). Currently, CenterPoint does not have any new large load customers that have signed agreements or contracts to operate within the Company's service territory, however, CenterPoint has had conversations with large load customers expressing interest in development within the service territory. As a result, for the preferred portfolio, CenterPoint forecasts its energy load and peak demand to have relatively modest growth in the future with energy requirements increasing 0.3% per year, summer peak demand increasing 0.5% per year, and winter peak demand increasing 0.3% per year over the IRP planning horizon ending in 2045 (with future DSM impacts removed from consideration). To account for the possibility that new large load customers do come online in CenterPoint's service territory, CenterPoint included such load in its forecasting by separately developing an alternate reference case scenario (and subsequent alternative preferred portfolio) that includes additional load increases in 250 MW increments until it reaches 1,500 MW (while other assumptions remain consistent with the reference case).[72] Under this alternate reference case scenario, CenterPoint developed five different portfolios, each designed to test alternate development pathways under the large load customer growth assumptions. These portfolios are as follows: 1) allowance for the model to freely optimize resource additions at least cost, 2) utilizing a 1x1 J Class NGCC turbine in 2032, 3) utilizing renewables and combustion turbines, 3) assuming F.B. Culley 3 converts to natural gas in 2030, and 5) assuming F.B. Culley 3

[71] CO Sun article ' Tri-State says no thanks to federal orders to keep Craig coal power plant open' by Michael Booth availabe here: https://coloradosun.com/2026/01/30/craig-tri-state-petition-coal-closure/

[72] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 179

converts to natural gas in 2035.[73] These portfolios and the resources assumptions associated with each portfolio is provided below in **Figure 6-1.**

Figure 6-1 – Alternate Reference Case Portfolios

Year	1: Optimization Run	2: 1x1 J Class in 2032	3: Renewables + CT's	4: FB Culley 3 NG Conversion 2030	5: FB Culley 3 NG Conversion 2035
2028	+1 FBC2 Storage (90 MW)	+1 FBC2 Storage (90 MW)	+1 FBC2 Storage (90 MW)	+1 FBC2 Storage (90 MW)	+1 FBC2 Storage (90 MW)
2030	+1 AB Brown7: Fired CCGT 2030 (850 MW)	+1 FB Culley:3 NG 2030 (270 MW) +1 AB Brown7: Fired CCGT 2030 (850 MW)	+1 AB Brown7: Fired CCGT 2030 (850 MW)	+1 FB Culley:3 NG 2030 (270 MW) +1 AB Brown7: Fired CCGT 2030 (850 MW)	+1 AB Brown7: Fired CCGT 2030 (850 MW)
2031			+1 Non IRA Wind + Storage (200 + 100 MW)		
2032	+1 2x1 J Class Fired CCGT (1361 MW)	+1 1x1 J Class Unfired CCGT (568 MW)	+1 Non IRA Wind + Storage (200 + 100 MW)	+1 2x1 J Class Fired CCGT (1361 MW)	+1 2x1 J Class Unfired CCGT (1144 MW)
2033			+5 Non IRA Wind + Storage (1,000 + 500 MW)		+1 2x1 J Class Fired CCGT (1361 MW)
2034		+1 2x1 J Class Unfired CCGT (1144 MW)	+2 Non IRA Wind + Storage (400 + 200 MW)		
2035	+1 J Class SCGT (385 MW)		+1 J Class SCGT (385 MW)	+1 J Class SCGT (385 MW)	+1 FB Culley:3 NG 2035 (270 MW) +1 Non IRA Wind + Storage (200 + 100 MW)
2036					
2037			+1 50 MW 4 Hour Storage (50 MW)		
2039		+1 50 MW 4 Hour Storage (50 MW)			
2040	+1 50 MW 4 Hour Storage (50 MW)		+1 F Class SCGT (222 MW)	+1 Non IRA Wind (Battery) (100 MW) +1 Non IRA Wind (Hybrid) (200 MW)	
2041					+1 50 MW 4 Hour Storage (50 MW)
2042	+1 100 MW 4 Hour Storage (100 MW)	+1 50 MW 4 Hour Storage (50 MW)			
2043					+1 50 MW 4 Hour Storage (50 MW)
2044		+1 50 MW 4 Hour Storage (50 MW)	+1 Non IRA Wind (200 MW)		
2045	+1 FB Culley:3 thru 2045 (270 MW) +1 Non IRA Wind + Storage (200 + 100 MW)	+1 Non IRA Wind + Storage (200 + 100 MW)	+1 FB Culley:3 thru 2045 (270 MW) +1 Non IRA Solar + Storage (100 + 50 MW) +1 Reciprocating Engine (110 MW)	+1 100 MW 4 Hour Storage (100 MW) +1 50 MW 4 Hour Storage (50 MW)	+1 100 MW 4 Hour Storage (100 MW) +1 50 MW 4 Hour Storage (50 MW)

United is concerned with the amount of transmission and specifically the cost of new transmission and transmission upgrades associated with the preferred portfolios and any additional large load coming online within CenterPoint's service territory. For an increase in load exceeding 300 MW, CenterPoint's system would require transmission upgrades, specifically $15.2 million to $16.4 million if A.B. Brown 6 and 7 is converted to an NGCC and additional thermal

[73] *Id.* At Pg. 180

resources come online.[74] CenterPoint further states that if thermal resources do not come online to meet large load increases, transmission upgrades due to required imports from neighboring regions would cost $152 million for a near-term 1000 MW load addition and $147 million for a long-term 1500 MW load addition.[75] CenterPoint specifically states that the costs resulting from this transmission analysis were not factored into the Net Present Value Revenue Requirement, as the location and timing of the load are speculative.[76] United is greatly concerned with customer affordability and transparency because these transmission costs associated with large load customers coming online are not adequately portrayed within the portfolio analysis. Furthermore, United asserts that Advanced Transmission Technology (ATTs), when cost effectively deployed, can allow a utility such as CenterPoint to avoid installing expensive and capitally-intensive generation resources as a result of large loads coming online. In fact, within AES's 2025 IRP, Dynamic Line Rating usage resulted in a 43% average capacity increase on AES's 345 kV lines.[77] United therefore recommends that CenterPoint utilize ATTs such as Dynamic Line Rating ("DLR") sensors for a majority of its transmission lines in order to realize greater benefits associated with DLR such as increased capacity on transmission lines and real-time situational awareness of transmission line conditions. Additionally, United strongly recommends that CenterPoint deploy advanced conductors such as composite conductors for both new transmission line construction and reconductoring of old transmission lines to further realize the benefits of ATTs. United urges CenterPoint to evaluate ATT opportunities on its transmission system and further understand the benefits associated with ATTs such as avoided transmission and generation costs.

United is additionally concerned with the considerable amount of resources that CenterPoint would need to obtain in the long-term in order to accommodate the potential new load that could be brought to CenterPoint's service territory, specifically with regards to the large amount of natural gas turbines that would be needed across the portfolios as showcased above in **Figure 6-1.** United does

[74] *Id.* At Pg. 184
[75] *Ibid.*
[76] *Ibid.*
[77] *See* AES Indiana's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on October 31, 2025 at Pg. 38

not necessarily believe that the best way to accommodate such large loads is for the utility to build large-scale generation resources. Because the large load will have a substantial impact on a utility's energy planning requirements (such as the IRP process), United believes that contracts/agreements/tariffs with new large load customers should address how the energy will be sourced and that such customers should have a choice in how a significant portion of their load will be met. Specifically, any agreement or tariff should generally provide for the customer's ability to choose the type of resources desired, such as generation, transmission, or distribution resources that are sources via utility procurements, bilateral/trilateral contracting, BTM, and/or FTM collocation arrangements. This type of arrangement would allow for the new large load customer to have more say in how their load is served, and will allow the utility to avoid constructing expensive large-scale resources thus insulating existing customers from the high cost associated with serving the new load. To divulge on this topic more, any agreement or tariff should provide options for the large load customer to deploy resources via on-site (or contiguous-site) supply to reduce customer load or provide monetary contributions to existing EE, DR, VPP, or demand flexibility programs that deliver broader grid benefits and create headroom that can lower the cost and increase the speed of connecting new large load customers. These options may not completely alleviate the need for new generation to serve new load, however, such contributions could reduce/mitigate the amount of generation needed to be constructed. To further support this position, CenterPoint states that "the resource mix used to serve the potential [large load] customer will be heavily influenced by the balance of the customer's needs and priorities. As discussions continue, CenterPoint will work to prioritize affordability for its existing customers and minimize future cost risk should conversations advance to negotiations or contracting".[78] Allowing a large load customer to have a say over the resources that are utilized to serve the customer's load can assist in balancing the customer's needs while prioritizing affordability.

In addition to allowing new large load customers greater choice over what resources will meet their load requirements, United asserts that there is a large amount of uncertainty within the natural gas turbine supply chain currently

[78] CenterPoint Energy's '2025 Integrated Resource Plan Volume I' submitted to the Indiana Utility Regulatory Commission on December 5, 2025 at Pg. 186

which allows for pause regarding CenterPoint's ability to construct an NGCC generator in the near future. The uncertainty surrounding the natural gas turbine supply chain is discussed at length in the section of these comments focused on Fossil Fuel Supply Chain Risk and United asks readers to refer to this section for more information on this topic. United therefore recommends that CenterPoint, in any agreements/tariffs/contracts, allow potential large load customers the ability to make decisions on the resources that will be supplying their load in order to reduce CenterPoint's need to construct large-scale generation resources such as an NGCC generator.

Conclusion:

United greatly appreciates the opportunity to provide comments on CenterPoint's 2025 IRP and notes that it has identified concerns and potential improvements on the following topics of the 2025 IRP: 1) Modeling Scenario Development and Portfolio Development, 2) Demand-Side Management Consideration, 3) Demand Response Aggregation Considerations, 4) the Distributed Generation ("DG") Incentive Program, 5) F.B. Culley 2 Conversion, 6) F.B. Culley 3 Conversion Considerations, 7) A.B. Brown Units 5 and 6 Conversion Considerations, 8) Fossil Fuel Supply Chain Risk and Capital Cost Assumptions, and 9) Large Load Customers: Load Considerations & Supply Flexibility. United has specific considerations and recommendations on each of the topics within these comments, and recommends that CenterPoint consider the suggested improvements in each topic area for applicability in future IRPs. United respectfully asks that the Commission and specifically the Commission's Director of Research, Policy, and Planning to consider these comments and recommend that CenterPoint adopt them in future IRP development efforts.

Brett Sproul | Policy Principal

Advanced Energy United