

1/29/2016

Dr. Bradley Borum
Director of Research, Policy, and Planning
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500 E.
Indianapolis, IN 46204-3407
Re: Indiana Michigan Power Integrated Resource Plan

Dear Dr. Borum:

I am writing to comment on Indiana Michigan Power's integrated resource plan, which spells out a 20-year energy plan for Fort Wayne, South Bend, Elkhart, Muncie and other communities that I&M serves. The plan was submitted to the Indiana Utility Regulatory Commission on November 2.

I am requesting emergency reduction of CO2 beyond national energy plan goals of 37% by 2030 based on a combination of increased utility scale wind power and energy efficiency solar integration (EESI), a plan for minimal 'base load' distributed solar cells with small battery storage for every building (minimally to cover emergency lighting, continuous access to telephonic and internet service, and supplemental power to cover a short power outage). This IRP modification would be based on elimination of both Rockport units by 2030 and elimination of all coal, nuclear and fossil fuels generated electricity by 2050. Emergency national executive action will release all lease limitations to this plan with planning evolution built on democratization of I & M Power Company and its parent company. Capital costs for distributed solar 'base load' system would be paid for 80% Federal, 15% State, 5% Local national emergency homeland security financing. This would return an expected leverage of private funding for building beyond minimal financing of distributed systems. In addition to the EESI the utility scale wind energy portfolio would be increased to supplement and complete the energy transition based on a national cost sharing plan that would hold customer costs to the national standard for a Ready State national energy portfolio to bring CO2 under control for reducing atmospheric CO2 to 350ppm.

I am very concerned that under I&M's proposed plan, the AEP Rockport plant – the sixth largest carbon polluter in the United States – will continue to operate for at least another 20 years. AEP Rockport is the sixth worst toxic polluter in Indiana and second most toxic power plant in Indiana. Not only is the Rockport plant bad for the environment and public health, it's a bad deal for consumers. I&M did not choose a less expensive plan that would end the lease on Rockport Unit 2 when it expires in 2022 and build more clean energy like solar and wind. I do not support I&M's proposed plan, which would spend more than \$6 billion during the next 20 years to retrofit and install expensive pollution controls on the AEP Rockport plant. I&M can and must do better. According to I&M's own analysis, the same customer dollars re-invested in cleaner forms of energy would reduce carbon pollution by 57 percent by 2040. Such a plan would likely create hundreds of local green energy jobs and economic opportunities in communities like mine.

Instead of investing further in dirty coal-burning generation, I&M could instead invest in clean energy like wind, solar, and energy efficiency that would directly benefit the communities I&M serves and ensure compliance with the federal Clean Power Plan. I&M also can do more to harness Indiana's wind resources, which are plentiful in I&M territory. The Indiana Department of Environmental Management estimates that Indiana potentially has five times the wind resources needed to meet federal renewable energy requirements of 20.5 percent clean energy by 2030.

I am also deeply concerned that I&M-sponsored energy efficiency programs – which include home energy audits, rebates on efficient appliances, and low-income weatherization programs – would fall to 7 percent of their current levels by 2021. I&M has a responsibility to help customers reduce their electricity bills through programs that help save energy, especially for those who can least afford the rising cost of electricity.

Please take these considerations into account as you review and comment on I&M's integrated resource plan, and take note of I&M's missed opportunities for cleaner air in Indiana, improved energy efficiency, and future economic growth in the I&M territory.

Sincerely,

Howard Traxmor, Member, Northeast Indiana 350
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