

**INDIANA MICHIGAN POWER COMPANY
JANUARY 20, 2025 COMMENTS
ON IURC 170 IAC 4-4.3 STRAWMAN, RM #24-01**

I. INTRODUCTION

Indiana Michigan Power Company (I&M or the Company) submits these comments on the Indiana Utility Regulatory Commission's (IURC or Commission) updated Strawman proposal on changes to 170 IAC 4-4.3 and to the additional input Commission Staff requested comments on via email on December 9, 2024. I&M appreciates this opportunity to provide these comments.

II. GENERAL COMMENTS

1. If the Level 1 Interconnection is updated to include generators up to 25kW, 170 IAC 4-4.3-4(a)(1)(A) will additionally need updated to reflect this change.
2. Replacing "Generator" with "Facility"
 - a. I&M provides the following additional comments regarding the replacement of the term "Customer Generator" with "Customer Facility." The term "Facility" is a North American Electric Reliability Corporation (NERC) defined term with the following definition: 'A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). The use of the defined term, "Facility," is likely to be found extensively throughout the hundreds of NERC Standards and Requirements.¹ Additionally, the terms, "Bulk Electric System" and "Element," found within the "Facility" definition, are also NERC defined terms. According to these NERC definitions, a "generator" is one type of "Facility."
 - b. I&M additionally provides that a "generator facility" is not typically certified as a whole, as referenced in 170 IAC 4-4.3-5, but the individual components may be certified. For additional context, switchgear (or "other interface devices") aren't typically certified to IEEE 1547-2018 or UL 1741, those standards are usually referring to the inverter. It is possible for an 'Equipment Package' to be certified, for example a transformer and inverter package can be purchased that is built all-in-one and has been certified together. If the redlines to the rule are accepted as proposed, I&M recommends the language in 170 IAC 4-4.3-5(a), "...a customer-facility must be certified..." be replaced with, "...the components within a customer- facility must be certified as applicable...."

¹ <https://www.nerc.com/pa/Stand/Pages/default.aspx>

III. IURC Specific Requests

1. IURC staff are particularly interested in feedback regarding whether 11kw - 25kw customer-facilities can be sufficiently reviewed under Level 1 interconnection reviews (see 170 IAC 4-4.3-6) or whether they require Level 2 interconnection reviews (see 170 IAC 4-4.3-7).

I&M Response: I&M has no concerns at this time regarding this change.

2. IURC staff requests input regarding the potential costs and benefits of these changes and the identities of impacted parties.

I&M Response: I&M would like to note that with the threshold increase proposed for Level 1 interconnections, this will expand the amount of customers who will not have to directly pay an application fee.² I&M provides that cost causers should be responsible for the costs being caused by their impact to the grid, and, in this instance, those submitting applications should be subject to associated application costs. If not charged directly to the cost causers, that overhead application expense is still ultimately reflected in I&M's base rates, which will increase its base rate case test year level of expenses associated with these uncollected applications fees, ultimately resulting in all customers paying these fees through higher rates.

IV. CONCLUSION

I&M appreciates the opportunity provided by the Commission for interested stakeholders to provide these additional comments on the updated 170 IAC 4-4.3 Strawman Revisions. As stated prior, one of I&M's main concern with the changes are unintended consequences to interpretation of 170 IAC 4-4.3 are accepted as proposed. I&M submits these comments for consideration by the Commission along with additional resources to assist with the final decision to updated 170 IAC 4-4.3.

Respectfully submitted,

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² See 170 IAC 4-4.3-4(a)(3e)(1).