



September 7, 2018

Mrs. Beth Heline and Mr. Jeremy Comeau  
Indiana Utility Regulatory Commission  
101 West Washington Street, Suite 1500 East  
Indianapolis, IN 46204

### **Wind on the Wires Written Comments**

#### **Re: IURC LSA Document #18-127: Proposed Revisions to the Rule Governing Preparation and Submission of Integrated Resource Plans by Electric Utilities**

Dear Mrs. Heline and Mr. Comeau:

Enclosed are Wind on the Wires' written comments regarding the proposed revisions to the Commission's rule requiring electric utilities to prepare and submit integrated resource plans (170 IAC 4-7).

#### **I. Written Comments**

##### **1. The Rule Should Not Adopt the Definition of "Renewable Energy Resources" Provided in A Statute Granting The Commission Authority to Issue Financial Incentives for New Generation**

The Proposed Rule defines "Renewable resource"; incorporating by reference a definition of "Renewable energy resources" from a statutory provision (IC 8-1-8.8) that requires the IURC to grant financial incentives to utilities to build new generating facilities if the utility complies with certain rate mechanisms and documentation requirements. That definition should not be used because the statute is unrelated to the integrated resource

plans, and more significantly, the list of ten resources that are defined as renewable is far broader than what is commonly accepted as renewable resources. IC 8-1-8.8 includes a definition of “Renewable Energy Resources” but the IURC is not required to use that definition for this rule, and the IURC should not use it just because it is a similar term.

IC 8-1-8.5-3 does not define “Renewable Resources” so the Commission has discretion in developing that definition. The resources most commonly considered renewable resources available in Indiana are wind, solar (photovoltaic), biomass, and hydropower. This list is consistent with the U.S. Energy Information Administration<sup>1</sup>, U.S. Environmental Protection Agency<sup>2</sup>, and National Renewable Energy Laboratory<sup>3</sup>.

Wind on the Wires recommends the IURC base its definition of “Renewable resources” on the expertise of the EIA, EPA and DOE and define it as wind, photovoltaic solar, biomass and hydropower.

#### PROPOSED REPLACEMENT LANGUAGE

170 IAC 4-7-1

(hh) "Renewable resource" means a facility that generates electricity from wind, sunlight, biomass or hydropower~~renewable energy resource as defined in IC 8-1-8.8-10.~~

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<sup>1</sup> U.S. Energy Information Administration, available at:

[https://www.eia.gov/energyexplained/?page=renewable\\_home](https://www.eia.gov/energyexplained/?page=renewable_home)

<sup>2</sup> U.S. Environmental Protection Agency, available at: <https://www.epa.gov/statelocalenergy/state-renewable-energy-resources>

<sup>3</sup> U.S. Department of Energy -- National Renewable Energy Laboratory, available at <https://www.nrel.gov/workingwithus/learning.html>.

## 2. Utility Should also Evaluate how DSM could defer new generation (170 IAC 4-7-8(c)(6))

Section 8(c)(6) requires a utility to include in the IRP an evaluation of how a utility's DSM (Demand Side Management) program defers or eliminates transmission or distribution facilities. DSM is primarily beneficial in reducing peak load, which directly affects how much generating capacity is needed to reliably serve customer demand. Thus, the utilities should also evaluate how much new capacity can be deferred or eliminated.

### PROPOSED REPLACEMENT LANGUAGE

**(6) An evaluation of dispersed generation and targeted the utility's DSM programs designed to defer or eliminate investment in new generating resources, a transmission or distribution facility, including their impacts, if any, on the utility's transmission and distribution system. for the first ten (10) years of the planning period**

## 3. Improvements to the Process Supported by Wind on the Wires

Wind on the Wires would like to highlight a few revisions that it supports. The proposed rule includes new language defining documents the utility is to include in a technical appendix.<sup>4</sup> This addition is important because it aids intervenors in understanding the structure, assumptions and calculations underlying the utility's IRP decisions. Consequently, this improves intervenor's comments and the credibility of the IRP.

Section 8(9) requires the utility to discuss potential methods it is considering to improve data quality and analysis, in an ongoing effort to improve the resource planning process and keep pace with changes in the electric industry. This addition emphasizes

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<sup>4</sup> §2(c)(2).

the need for constant improvement in the modeling and analysis, and prevents the utility's modeling and analysis from becoming outdated and stale.

Finally, section 8(10) has the utility develop a strategy to adapt the preferred resource portfolio to unexpected circumstances. This emphasizes system flexibility and resilience to adapt.

## **II. Conclusion**

WHEREFORE, Wind on the Wires recommends that the proposed revised rule for integrated resource plans (170 IAC 4-7) reflects the recommended changes proposed herein.

Respectfully submitted,

/s/

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