March 23, 2026

Dr. Bradley Borum, Director of Research, Policy, and Planning
Indiana Utility Regulatory Commission
PNC Center, 101 W. Washington Street, Suite 1500E
Indianapolis, IN 46204

Re: Clean Grid Alliance comments on the CenterPoint Energy Indiana South 2025 IRP

I. INTRODUCTION

Clean Grid Alliance ("CGA") is a membership-based, 501(c)(3) nonprofit organization with a mission of advancing clean energy in the Midwest through participation in the Midcontinent Independent System Operator ("MISO") stakeholder process and engagement before public utility regulatory commissions and state legislatures across MISO's North and Central footprint. CGA's diverse membership includes more than 80 companies representing clean energy developers, clean energy and environmental nonprofit organizations, data centers, and businesses providing goods and services to the clean energy industry.

CGA respectfully submits these comments on the 2025 Integrated Resource Plan ("IRP") of CenterPoint Energy Indiana South ("CEIS" or "the Company"). CGA participated in two of the three technical meetings hosted by CEIS and attended three of the Company's four public meetings.[1] We also utilized the discovery process for clarification; suggesting modifications to modeling inputs, assumptions, and scenarios; and proposing new sensitivities or modeling modifications based on material presented at these meetings. CGA thanks the CEIS team for their responsiveness to our questions and feedback throughout the development of this IRP. Nevertheless, we remain concerned about several issues which we address in these comments:

- capital cost assumptions in the Reference Case,
- risk related to large load additions in the Alternate Reference Case, and
- the overall lack of resource diversity in the Preferred and Alternate Preferred Portfolios.

Finally, we appreciate the Company's study of the potential for replacing the Culley 2 coal-fired unit with on-site storage, and we support the proposed short term action to issue a Request for Proposal ("RFP") for battery storage in 2026.[2]

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[1] CGA attended the August 20th and October 15th Tech-to-Tech meetings as well as the May 14th, September 11th, and October 23rd Public Stakeholder meetings.
[2] CenterPoint Energy Indiana South 2025 IRP Vol. 1 ("2025 IRP"). Ch. 7, "Short Term Action Plan," Fig. 7.1, "Implementation Schedule", p. 191. CEIS proposed issuing the RFP in Q1 or Q2 of 2026.

II. OVERVIEW: PREFERRED OVERVIEW & SHORT TERM ACTION PLAN

CEIS derived 12 candidate portfolios from five unique scenarios that envisioned different regulatory, economic, and environmental policy conditions through the planning period (i.e., 2025-2039).[3] The "Reference Case" scenario "provides an outlook on likely future conditions" and reflects current environmental, economic, and carbon emissions policy and baseline load growth, commodity price, and capital cost trends.[4] Extrapolating from there, the "Alternate Reference Case" scenario adds 1,500 MW of large load growth to the Reference Case; the "High Regulatory" scenario introduces stronger environmental, economic, and carbon emissions policies, with impacts to load, commodity price, and capital cost forecasts; the "Alternate High Regulatory" scenario modifies carbon policy, load, and demand-side resource inputs compared to the High Regulatory scenario; and the "Low Regulatory" scenario strongly limits environmental policy and economic support for a clean energy transition. These scenarios informed the resulting candidate portfolios, which tested unique pathways to meet the Company's needs by varying resource mixes, generator retirement timelines, and renewables and storage deployment levels.[5] CEIS selected the Delayed Reference and Alternate Reference portfolios as the 2025 IRP dual Preferred Portfolios.

Short Term Action Plan. From now to 2028, the Delayed Reference Case Preferred Portfolio maintains renewable additions from the Company's 2022 IRP, adds up to 90 MW of 4-hour energy storage and delays replacement of the coal-fired Culley 3 unit, and the Alternate Reference Case Preferred Portfolio relies on expanded transmission capacity from the MISO Long Range Transmission Plan to meet new large load additions. Neither portfolio adds new wind or solar in this short-term period, nor though 2039.

Both portfolios accounted for the planned retirement of 90 MW at Culley 2 at the end of 2025, but since this IRP was filed, the U.S. Department of Energy ("DOE") exercised Federal Power Act ("FPA") authority under Section 202(c) to force the coal-fired unit to remain operational into 2026. The DOE order is being challenged by public interest organizations.[6] Meanwhile, CEIS opened a case at the Indiana Utility Regulatory Commission ("IURC") seeking permit approval and cost recovery associated with compliance with the order.[7] The impact of the DOE's use of FPA Section 202(c) on this IRP is undetermined, but the DOE order is temporary. Thus, CGA encourages the Company to proceed with the planned RFP for a battery storage replacement per the 2025 IRP Short Term Action Plan,[8] and in doing so, seek bids for storage of any duration (including multi-day systems) and from lithium-ion alternatives.

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[3] 2025 IRP, Ch. 2, "Resource planning process", pp. 58-62. Note Fig. 2-2 on p. 61.
[4] 2025 IRP, Ch. 2, pp. 58-59.
[5] 2025 IRP, Ch. 2, Sec. 2.9, "Comprehensive portfolio development & testing", pp. 65-68.
[6] On January 22, 2026, the Sierra Club, Citizens Action Coalition of Indiana, Just Transition Northwest Indiana, Hoosier Environmental Council, Environmental Law and Policy Center, and Public Citizen (collectively, "Public Interest Organizations" or "PIOs") requested a rehearing and stay of DOE Order No. 202-25-13.
[7] IURC. Cause No. 46350. (Filed January 5, 2026).
[8] 2025 IRP, Ch. 7, "Short Term Action Plan", Section 7.2.2 on p.190 and Fig. 7-1 on p. 191.

III. CAPITAL COSTS: REFERENCE CASE & ALTERNATE REFERENCE CASE

The Delayed Reference Case underpinning the Preferred Portfolio is representative of current market conditions, including tax credit assumptions for utility-scale wind, solar, storage, and nuclear reflecting changes from the new federal tax law (the "OBBBA") and capital costs and fuel prices based on the Company's assessment of the current market. The Alternate Reference Case retains these assumptions, with the exception of incrementally increasing the load forecast up to 1,500 MW representative of potential economic development customers. CGA's comments in this section focus on problematic capital cost assumptions while we address concerns related to treatment of large loads under the Alternate Reference Case in Section IV.

Capital costs for renewable and storage resources are comparatively high. CEIS developed base capital cost estimates for new wind, solar, and storage by blending responses to the Company's 2024 All-Source Request for Proposals ("All-Source RFP") with the National Renewable Energy Laboratory ("NREL") Annual Technology Baseline cost curves, with adjustments made for inflation and supply chain constraints.[9] Even so, the Company's cost projections appear high relative to other regional projections. For example, the table below compares CEIS' capital cost assumptions to those from the AES Indiana ("AES") 2025 IRP which, importantly, was developed during the same period:

Table 1: Comparison of solar & storage capital cost assumptions of CEIS[10] and AES[11].

Resource type	CEIS (2025 $/kW)	AES (2025 $/kw)
4-Hour lithium-ion storage	$2,273	$2,024
Solar	$2,351	$1,731
Solar + 4-hour storage[12]	$4,130	$3,500
Wind + 4-hour storage	$3,630	N/A

[9] 2025 IRP, Ch. 2, p. 59, and Ch. 3, "Forecasts and key modeling assumptions", Sec. 3.7, "Potential future resource options", pp. 104-115. *Also see* 2025 IRP Vol. 2, "Technical appendix attachments", Att. 2.2, "2025 Technology assessment summary".
[10] *Ibid.*
[11] AES Indiana 2025 IRP. (Filed October 30, 2025). *See* Section 6.2, "Supply-side resource options", from p. 77.
[12] As another point of comparison, Lawrence Berkeley National Labs recently showed that solar and storage hybrids average $2,500/kW, with the storage component adding approximately $1,000/kW to total system costs, but CEIS and AES both estimated that storage would add about $1,400-1,500/kW to total solar project costs. *See* Lawrence Berkeley National Labs. "U.S. utility-scale solar: 2025 Data update". (October 2025). Accessed at: https://emp.lbl.gov/sites/default/files/2025-10/Utility%20Scale%20Solar%202025%20Edition%20Slides.pdf

While CEIS has no plans to add renewables beyond those included in the 2022 IRP, CGA encourages CEIS to reevaluate renewable integration in the 2028 IRP and reissue an All-Source RFP prior to that for the most up to date cost projections. Affordability is of increasing concern, and the 2026 midterms or 2028 presidential election could lead to the reinstatement of some level of federal support for clean energy resources. CEIS assumed wind and solar projects would qualify for federal tax credits under the OBBBA until 2030, an approach CGA believes made sense for an initial base case analysis. However, CEIS did not conduct any sensitivity analysis of the Reference Case with any level of federal support for wind and solar re-instated within the planning period. When reevaluating renewable integration in the 2028 IRP, CEIS should test the base case scenario with tax credits for renewables reinstated in 2030. CEIS must look ahead to the possibility of a policy regime centering renewables, such as the energy future in which renewables play a central and strategic role being contemplated by Indiana's Strategic Energy Growth Task Force, and prepare with diligence and proactive planning.[13]

Capital cost assumptions for natural gas turbines are unrealistically low. Capital costs for a variety of natural gas turbine configurations are based on the Tech Assessment, which applies an escalated inflation rate to the NREL cost curves. Again comparing 2025 Indiana IRPs, CEIS assumes combustion turbines ("CTs") and combined cycle gas turbines ("CCGTs") will cost significantly less than does AES:

Table 2. Comparison of CCGT and CT capital cost assumptions of CEIS[14] and AES[15].

Resource type	CEIS (2025 $/kW)	AES (2025 $/kw)
CCGT	$2,039	$2,771
CT	$1,190	$1,546

As has been widely documented, extraordinary demand for gas turbines has contributed to a more-than-doubling of unit costs and to gigawatt-scale backlogs in turbine orders, trends expected to persist or increase through the early 2030s.[16] CEIS correctly, then, limited new CT availability to

[13] Indiana Office of Energy Development. Strategic Energy Growth Task Force. Meetings of the task force can be viewed here: https://www.in.gov/oed/news-events/

[14] 2025 IRP, Vol. 2, Att. 2.2, "2025 Technology assessment summary".

[15] AES Indiana 2025 IRP. Section 6.2.4. "Natural gas resources". Starting on p. 84.

[16] *See* GridLab, "The new reality of power generation: An analysis of Increasing Gas Turbine Costs in the U.S.", (September 2025), accessed at: https://gridlab.org/portfolio-item/gas-tubine-cost-report/; Utility Dive, "GE Vernova expects to end 2025 with an 80-GW gas backlog that stretches into 2029", (December 11, 2025), accessed at: https://www.utilitydive.com/news/ge-vernova-gas-turbine-investor/807662/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202025-12-11%20Utility%20Dive%20Newsletter%20%5Bissue:79762%5D&utm_term=Utility%20Dive; *and see* S&P Global, "US gas-fired turbine wait times as much as seven years; costs up sharply," (May 20, 2025), accessed at: 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#:~:text=US%20gas%2Dfired%20turbine%20wait,EN.

2030 and new CCGT availability to 2032.[17] However, CEIS should assume capital costs for natural gas will be higher than what was modeled in this IRP through the early 2030s. Indeed, AES saw 2026 CCGT costs *double* from the $1,100/kW the utility estimated in 2022.[18] Beyond capital costs, CEIS forecast that gas fuel prices would increase steadily from $4/MMBtu in 2026 to nearly $8/MMBtu by 2045.[19] These factors lead CGA to raise both affordability and reliability concerns under the Preferred Portfolios (see Section IV below), particularly with regards to the Alternate Preferred Portfolio which cements the Company's reliance on thermal by operating Culley 3 on coal through the planning period and adding a new CCGT after 2032.

Prior to making delayed resource decisions (i.e., related to Culley 3 and the CT conversions) *or* investing in new CCGT(s) in the 2028 IRP, CEIS should reevaluate the prudency of further investment in gas-fired generation and revisit its capital cost outlooks for renewables and advanced technologies.

IV. RISKS: PREFERRED & ALTERNATE PREFERRED PORTFOLIOS

Lack of resource diversity. Major resource decisions under the Preferred Portfolio include converting two existing CTs to CCGTs in 2034, maintaining other existing CTs, and continuing coal-fired operations at Culley 3 rather than converting the unit to gas by 2027 as planned in the Company's 2022 IRP. These actions would leave CEIS heavily dependent on fossil fuel resources. Thus, CGA disputes the Company's characterization of this portfolio as "a diverse mix of resources". While CEIS is proceeding with renewable resource additions from its 2022 IRP, the Company makes no additional investment in new wind or solar through 2039 and plans for only a moderate amount of energy storage, adding the bulk late in the planning period (post 2040).

Indiana's Five Pillars of Energy Policy – resiliency, reliability, affordability, environmental sustainability, and stability – tacitly encourage resource diversity. Grids with greater penetration of wind and solar have demonstrated their resilience in extreme weather and their ability to mitigate blackout intensity.[20] Long-duration and multi-day storage are viewed as critical hedges against power supply interruptions and plant outages during extreme weather.[21] Furthermore, the Department of Energy has previously recommended that utilities take a diversified "portfolio approach" to ensuring resource adequacy.[22] Yet, this IRP leads CEIS to risk affordability, reliability, resiliency, and instability from future regulation of the fossil-fuel resources it relies on.

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[17] 2025 IRP, Ch. 3, Sec. 3.9.1, "Resource availability", pp. 132-134.
[18] 2025 IRP. Section 9.2.2. "Candidate portfolio summaries". P. 203.
[19] 2025 IRP, Ch. 8, "Technical appendix", Sec. 8.4.1.2, "Natural gas price uncertainty". Note Fig. 8-34 on p. 219.
[20] Nature Energy. "Impacts of renewable energy resources on the weather vulnerability of power systems." (October 21, 2024.) Accessed at: https://www.nature.com/articles/s41560-024-01652-1
[21] CRA. "LDES: Leading indicators." (Winter 2023.) Accessed at: https://media.crai.com/wp-content/uploads/2024/03/28175856/IRA-Leading-Indicators-Winter-2023.pdf
[22] U.S. Department of Energy. "The future of resource adequacy." (April 2024.) Accessed at: https://www.energy.gov/sites/default/files/2024-04/2024%20The%20Future%20of%20Resource%20Adequacy%20Report.pdf

The consequences of such risks were recently on display when Winter Storm Fern caused natural gas infrastructure to fail across the U.S., leading to blackouts and spiking power prices. Temperature-related gas supply constraints caused power prices to surge from $400-700/MWh in PJM,[23] while regions with higher levels of renewables and storage (like MISO) weathered the storm with more moderate price impacts.[24] Gas supply, along with associated infrastructure and transport constraints, is tightening as demand for the fuel increases, which more and more concerns the regulatory community – even outside extreme weather events.[25] Yet, timely gas storage and pipeline development face local opposition, siting, and permitting challenges. CEIS did not model the cost or operational effect of emissions abatement, assuming that current greenhouse gas regulations would be repealed, but similar or more aggressive carbon abatement measures could be reinstated by a future administration and would make gas-fired generation an even riskier investment from developmental, operational, and affordability perspectives.

Furthermore, recent U.S. intervention in Iran has disrupted energy production. Longer-term impacts on oil and gas markets are unknown, but in the immediate aftermath, both markets reacted with increased prices.[26]

Thus, CGA cautions CEIS against overreliance on natural gas, and urges the Company to pursue a truly diversified portfolio. Adding clean energy resources will contribute to long-term cost-effectiveness of the Company's generating portfolio through their ability to provide fixed, low-cost power for decades, without exposure to fuel cost volatility. Additionally, investing in wind, solar, and storage would help CEIS avoid stranded assets while ensuring a reliable and resilient system. In Section V we detail actions CEIS should take to capture these benefits.

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[23] Reuters. "Power plant outages surge in Eastern US amid restricted gas supplies and frigid weather". (January 26, 2026) Accessed at: https://www.reuters.com/business/energy/power-prices-surge-winter-storm-spikes-demand-us-data-center-alley-2026-01-25/?utm_campaign=Newsletter&utm_medium=email&_hsenc=p2ANqtz-_QBRinIkaHI16X6wKsZL-Ho7A-p0Ewyz33RV6fgep4dRHTUjNKphaPBB18FzNMVMMQoqLzDp79JhyABNvi-bEMEMNqZw&_hsmi=400360088&utm_content=400360088&utm_source=hs_email

[24] American Clean Power Association. "Clean energy saved consumers 2+ billion during Winter Storm Fern". (February 2026). Accessed at: https://cleanpower.org/resources/clean-energy-saved-consumers-2-billion-during-winter-storm-fern/

[25] The National Association of Regulatory Utility Commissions established the Taskforce on Gas-Electric Alignment for Reliability ("GEAR") in November 2023 to "better align the gas and electric industries to maintain and improve the reliability" of the intertwined energy systems. More information, including GEAR's recent recommendations, is available at: https://maxxwww.naruc.org/forms/committee/CommitteeFormPublic/viewExecCommittee?id=13B6350000001C&multicolumns=1. *Also note* the Multi-utility Emergency Cooperability Work Group, convened by the Michigan Public Service Commission in December 2025, to "review and discuss cooperability between natural gas and electric utilities during multi-utility emergency events." More information about the work group is available at: https://www.michigan.gov/mpsc/commission/workgroups/multi-utility-emergency-cooperability-workgroup.

[26] Politico: E&E News. "Republicans dismiss Iran conflict energy price concerns." (March 3, 2026). Accessed at: https://www.eenews.net/articles/republicans-dismiss-iran-conflict-energy-price-concerns/

Large load uncertainty. CEIS developed the Alternate Reference Case scenario as a theoretical exercise layering *potential* large load demand onto the Reference Case in 250 MW increments.[27] Of the five pathways to meeting this growth, CEIS selected the "optimized" portfolio as the preferred pathway. Major resource decisions according to this plan are similar to those under the Delayed Reference Case, with the exception of the conversion of two CT units to CCGT by 2030 and continued operations at Culley 3 through the planning period, actions the Company acknowledged are "less favorable from an environmental perspective" compared to the other possible pathways.[28] CGA opposes the Company's decision to propose dual preferred portfolios despite not having executed any contract with large load customers by the IRP filing, and not least because the major resource decisions involve substantive investment in new thermal generation.

Speculative loads (i.e., those without executed service agreements or long-term contracts) should not be incorporated into Indiana IRPs, as the IRP process lays the groundwork for future resource actions such as those contemplated in CEIS' Alternate Preferred Portfolio.[29] A suite of emerging resource planning practices aimed at large load integration recommend "maturity assessments" that exclude projects not meeting maturity criteria from load forecasts;[30] "phased infrastructure investment" that is based on confirmed loads and/or key development timelines;[31] and assessments of the likelihood of the load addition using elements such as a new load's interconnection, site control, and permitting status.[32] Along these lines, the Colorado Public Utility Commission recently ordered a Colorado utility to produce contractual commitments before it may include any large loads in its resource planning forecast.[33] Furthermore, the State of Indiana already accommodates today's uncertain planning environment by providing a pathway for expedited approval of new generating resources required by new large loads through the Expedited Generation Resource ("EGR") planning and associated procurement processes.[34]

The EGR policy provides Indiana's regulated electric utilities with an opportunity for expedited planning and procurement—outside the IRP process—when load growth exceeds either (1) prior peak demand (by certain metrics), or (2) 150 MW. Approved EGR plans allow

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[27] 2025 IRP, Ch. 7, "Alternate Preferred Portfolio" starting at p. 177.
[28] 2025 IRP, Ch. 7, p. 183.
[29] See 170 Indiana Administrative Code ("IAC") Chapter 4, Rule 7, "Guidelines for IRP by an electric utility". In particular, see 170 IAC 4-7-2.5, "Effects of IRP in docketed proceedings".
[30] ESIG Large Loads Task Force. "Forecasting for large loads." Pp. 34-35.
[31] Charles River Assoc. "Utility planning best practices", pp. 15-16. *See* MO PSC Docket No. EO-2026-0088, "Annual IRP update: Appendix A".
[32] Energy Futures Group. "Review of large load tariffs to identify safeguards and protections for existing ratepayers." (January 28, 2025). Pp. 28-29. Accessed at: https://energyfuturesgroup.com/wp-content/uploads/2025/01/Review-of-Large-Load-Tariffs-to-Identify-Safeguards-and-Protections-for-Existing-Ratepayers-Report-Final.pdf.
[33] Colorado PUC. Proceeding No. 24A-0442E. *In the matter of the application of Public Service Company of Colorado for approval of its 2024 Just Transition Solicitation*. See Decision No. C25-0747. (Issued November 6, 2025). See 63 at pp. 28-29 and 101 at pp. 44-45
[34] Indiana Public Law 217 (2025), formerly House Bill 1007, "An act to amend the Indiana Code concerning utilities," was added as a new chapter to Ind. Code 8-1-7.9.

utilities to take requisite resource actions and earn cost recovery of generating projects for which need is demonstrated under the EGR plan. In January 2026, Indiana Michigan Power Company, received approval of the state's first EGR plan to meet a 3,400 MW capacity commitment to large customers.[35] Importantly, I&M supported the load forecast in its petition with executed electric service agreements justifying new capacity commitments since its 2025 IRP.[36]

CGA urges the IURC to verify that CEIS' large load forecast is reinforced by firm contractual commitments between the Company and any large customers before providing regulatory pathways to approval of any associated projects. Our recommendations are discussed in detail in Section V(C) below.

V. RECOMMENDATIONS: SHORT TERM ACTION PLAN & 2028 IRP

CGA recommends several improvements to the 2025 IRP to guide the Company's Short Term Action Plan, ensure responsible planning for new large loads, and inform the CEIS 2028 IRP.

A. Short Term Action Plan. Before proceeding with resource actions under the Short Term Action Plan, CEIS should:

1. **Complete a sensitivity analysis of the Delayed Reference Case with pre-OBBBA tax credits for wind and solar reinstated in 2030.** This analysis should inform decision-making related to the major resource decisions described in the Short Term Action Plan.

2. **Pilot long-duration, multi-day, and/or non-lithium-ion storage technologies for some portion of the 90 MW of storage included in the Short Term Action Plan**. CEIS should attempt to elicit responses for long-duration, multi-day and non-lithium-ion storage pilot projects in the storage RFP for replacement resources at Culley 2.

B. 2028 IRP. In developing its next IRP, CEIS should:

1. **Reevaluate the planned CT to CCGT conversions.** CEIS should reconsider the prudency of maintaining thermal generation at that time, based on cost and regulatory outlooks for storage, solar, wind, and thermal resources.
2. **Allow the capacity expansion model to select long-duration, multi-day, and non-lithium-ion storage alternatives.** CGA appreciates that the Company incorporated these technologies into the 2025 IRP per stakeholder request, and further, notes that increased deployment of these technologies will continue to bring their capital costs down.[37]

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[35] *See* Indiana Utility Regulatory Commission ("IURC"). Docket No. 46301. *In the matter of the verified petition of Indiana Michigan Power Company for approval of an Expedited Generation Resource Plan, associated accounting and ratemaking relief (including authority to defer costs for subsequent recovery and timely recovery of costs), a Generation Resource Submittal compliance filing process, and protection of confidential information from public disclosure.* (Filed September 26, 2025).

[36] IURC. Docket No. 46301. Verified Petition at 24 (p. 9) and 26 (p. 10).

[37] *See, for example, the following announcements:* Electrek, "The US's first grid-scale sodium-ion battery is now online," (September 25, 2025), accessed at: https://electrek.co/2025/09/25/us-first-grid-scale-sodium-ion-battery-is-now-online/ek; Minnesota Public Utilities Commission, Docket No. M-23-119, *In the matter of the petition of*

3. **Use the most up-to-date resource accreditation methodology and resource accreditation values.** CEIS should consider preserving the "smoothing" approach taken in this IRP to resource accreditation declines under MISO's direct loss of load ("DLOL") framework during the early years of its implementation (i.e., 2028-2035), and in any case should be aware that MISO's DLOL values are evolving and subject to change.

C. Large loads. Under the regulatory compact, CEIS is charged with both serving the public interest and providing non-discriminatory service to new customers. To do this, CEIS should:

1. **Withdraw actions associated with the Alternate Preferred Portfolio from the Short Term Action Plan.** Rather, at the time of contracting with any large load customer(s), CEIS should evaluate whether additional generating and/or storage resources are required, and subsequently determine whether an EGR Plan, upcoming IRP, or other regulatory avenue is the most appropriate venue for obtaining project approval(s).
2. **File a large load tariff with the IURC prior to the submission of its 2028 IRP.** CEIS should incorporate into such tariff consumer protections like best-practice cost-causation principles and safeguards against stranded assets, as well as incentives for demand response and clean energy (e.g., voluntary programs or interconnection prioritization).
3. **Perform additional diligence on the feasibility of meeting large loads with wind, solar, and energy storage**. As large load customers are contracted, CEIS should conduct subsequent all-source RFPs to identify resources with attributes consistent with those required to serve the large loads rather than prematurely ascribing resources to uncommitted customers.
4. **Exclude uncommitted large loads from future IRP load forecasts.** CEIS should only include in the IRP load forecast those loads for which binding service contracts have been executed.

I. CONCLUSION

CGA thanks the IURC for the opportunity to express our concerns and offer our recommendations in the matter of the CEIS Indiana 2025 IRP. We look forward to feedback from the Commission, CEIS, and other stakeholders on these and other issues related to this IRP.

Sincerely,

Emily Piontek, Regulatory Associate
Clean Grid Alliance

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*Northern States Power Company d/b/a Xcel Energy for approval of a long-duration energy storage pilot project at Sherco, (*Filed March 6, 2023); *and* Xcel Energy, "Xcel Energy to power new Google data center in Minnesota." (February 24, 2026), accessed at: https://newsroom.xcelenergy.com/news/xcel-energy-to-power-new-google-data-center-in-minnesota.