

**Via Email**

Steven Davies

Deputy General Counsel  
Indiana Utility Regulatory Commission  
101 West Washington Street, Suite 1500 East  
Indianapolis, IN 46204

*Re:* LSA Document # 25-368 /Regulatory Analysis-Small Business Economic Impact Statement

Dear Mr. Davies,

Pursuant to Indiana Code 4-22-2.1-5(c)(2), as the Small Business Ombudsman for the state of Indiana, I have reviewed the proposed rule and economic impact analysis associated with the rule changes contained in LSA Document # 25-368 submitted to the Indiana Small Business Ombudsman by the Indiana Utility Regulatory Commission. I have found the following to be true.

Proposed rule LSA #25-368 amends 170 Indiana Administrative Code (IAC) 4-4.3, the proposed rule implements standards created by the Federal Energy Regulatory Commission's Order No. 2222 by order of the General Assembly. The proposed rule also changes definitions from "customer generation facility" to "customer facility" while updating customer-facility performance standards through the incorporation of IEEE 1547-2018 and UL 1741 standards that were incorporated but have been updated since that past incorporation into Administrative Code. It also changes level 1 review procedure to extend to 25 kilowatts rather than the previous ten kilowatts allowing for more customers to attach to the utility lines without a fee.

The Indiana Utility Regulatory Commission provided analysis displays a proper due diligence and understanding of how implementation must be carried out to ensure compliance while minimizing the potential impact to small businesses and individuals. Based upon this statement and review, the Indiana Small Business Ombudsman is neutral on the proposed rule related to the economic impact on small business if the Indiana Utility Regulatory Commission conclusion reflects the actual result after promulgation. If there are any questions about these comments, please contact me at [ombudsman@iedc.in.gov](mailto:ombudsman@iedc.in.gov).

Sincerely,

Caleb Wakeman

Small Business Ombudsman

Indiana Economic Development Corporation