

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 want to see Indiana using a much higher rate of renewable energy in 20 years, in fact, in 10 years. I would also like to see Indiana stop burning coal at both coal-burning units at the AEP-Rockport plant and retire half of that plant by 2020. I&M's own analysis shows that continuing to burn coal at the plant will be \$6 billion in additional pollution control equipment and pollution costs. I&M's own analysis shows that a plan that would retire half of the two-unit AEP Rockport in 2022 would cost less in most future scenarios than the plan they actually chose. Why choose the plan that costs more and takes longer to clean our air?

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,

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