



The State Agency Representing
Hoosier Utility Ratepayers

March 3, 2022

Beth E. Heline, General Counsel
INDIANA UTILITY REGULATORY COMMISSION
101 W. Washington St. Ste., 1500 East
Indianapolis, IN 46204
Email: bheline@urc.IN.gov

Re: OUCC's Comments and Proposals IURC Strawman MSFR

Dear Ms. Heline:

We appreciate the hard work you and other IURC staff have undertaken creating a strawman for discussion and the opportunity to provide our comments and suggestions. I recall that the Commission made many revisions to the Minimum Standard Filing Requirements more than a decade ago. From a drafting perspective, the current rulemaking must be particularly challenging because of the Rule's expanding role (e.g. including municipal utilities) and the need to address the timeframes and multiple kinds of test periods authorized by IC 8-1-2-42.7.

We considered the proposed changes in light of our role as a statutory party to all rate case proceedings before the Commission. But we believe revising the rules will benefit all parties to these proceedings by making requirements clear, affording an appropriate mechanism for relief from requirements determined to be unnecessary and tolling statutory timing requirements until parties have submitted the information these rules require.

It was not possible to share all our suggestions, questions and observations or explain all our proposed changes through this submittal. We are hopeful the process will continue in a manner that will permit us to further explain our proposed language and understand more fully the perspectives of other participants and provide input. In addition to addressing what information should be provided in a utility's case-in-chief, we have prepared proposed language establishing a

process for identifying omission's and establishing how such omissions may be cured. Also, where the strawman suggests waivers may be granted from certain requirements, we suggest a section creating a process for establishing those waivers. We propose a separate section establishing how workpapers in general should be presented. We propose definitions including definitions for the various kinds of test periods. We propose language establishing timeframes within a procedural schedule that will allow flexibility while maintaining the timeframes the Commission values such as the 90 days it requires for the preparation of the final order.

Thank you again for the opportunity to participate in this process.

Sincerely,

A handwritten signature in blue ink that reads "Daniel M. Le Vay". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel M. Le Vay
Deputy Consumer Counselor

Enclosure

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