
IURC RM #11-xxx

**RULEMAKING COMMENTS ON
INTEGRATED RESOURCE PLANNING**

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UNITED STATES STEEL CORPORATION

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United States Steel Corporation ("U. S. Steel") respectfully submits the following comments in connection with the Commission's rulemaking to implement the Integrated Resource Planning Rules ("IRP Rules"). U. S. Steel is a large industrial customer that also produces energy as a byproduct of its industrial process. As such, U. S. Steel produces energy that qualifies as a "clean energy resource" as described in I.C. 8-1-37(4)(a)(13). It is from the unique perspective of both a large industrial customer and a clean energy resource provider that U. S. Steel offers the following comments for the Commission's consideration in connection with the Commission's IRP Rules.

1. Public Advisory Process - U. S. Steel endorses the process added at 170 IAC 4-7-2.1 that allows for stakeholder input through a Public Advisory Process. Specifically, U. S. Steel agrees with the Commission that it is crucial for stakeholders and the utility to have meaningful conversations and/or meetings about the IRP while the IRP is being developed. U. S. Steel agrees with the Commission that allowing a utility to merely explain its IRP to stakeholders after the IRP's completion does not allow for constructive discourse or the opportunity to create an IRP that reflects legitimate concerns of stakeholders. If necessary, the Commission should adjust the IRP timelines so that a utility may address stakeholder concerns before an IRP is finalized and submitted to the Commission. Additionally, the rule should specify that a utility must respond to stakeholder concerns in good faith. Ultimately, U. S. Steel agrees that the addition of a meaningful and proactive Public Advisory Process has multiple benefits and should be included in the final rule.

2. Reasonable Consideration of All Energy Resources - The Commission should retain the language in 170 IAC 4-7-6(c) and 170 IAC 4-7-8(b)(3) of the proposed rule that requires a utility to consider demand side resource alternatives and all supply-side resources,

including the renewable resources included in I.C. 8-1-37(4) when a utility analyzes the sources of energy it will use to meet demand. In order to give effect to the CHOICE Program established by I.C. 8-1-3 et seq., and to encourage the use of a diverse array of clean energy resources, it is critical that a utility consider a full range of options in the IRP process. As such, the Commission should preserve the language in the proposed IRP rule that requires a utility to consider all of the clean energy resources described in I.C. 8-1-37(4).

U. S. Steel appreciates the Commission's consideration and looks forward to further collaboration with the Commission through the rulemaking process.

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