



MEMORANDUM

TO: Commission Chairman James F. Huston
Commissioners Bennett, Freeman, Veleta and Ziegner

FROM: Commission Technical Divisions

DATE: May 22, 2025

RE: 30-Day Utility Articles for Conference on *Wednesday, May 28, 2025 @ 10:00 a.m.*

The following thirty-day filings have been submitted to the Commission. Each item was reviewed by the appropriate Commission Technical Divisions and all regulations were met in accordance with 170 IAC 1-6 Thirty-Day Administrative Filing Procedures and Guidelines. Therefore, the following filings listed below and attached hereto are recommended to be considered by the Commission at the next conference:

Attachment Number	30-Day Filing No.	Name of Utility Company	Type of Request	Date Received
1	50811	Indiana Michigan Power Company	Amendments to I&M's Rider D.R.S.1 (Demand Response Service - Emergency).	2/20/2025
2	50832	Brown County Water Utility, Inc.	Simultaneous Water Tracker	4/22/2025
3	50833	Northern Indiana Public Service Company - Gas	Revisions to service under Rates 328 and 338.	4/28/2025

Submitted By: Jane Steinhauer
Director, Energy Division

Filing Party: Indiana Michigan Power Company (“I&M”)

30-Day Filing ID No.: 50811

Date Filed: February 20, 2025

Filed Pursuant To: Commission Order No. 43566 PJM 1

Request: An update to Rider D.R.S.1 (Demand Response Service – Emergency) to reflect the current Curtailment Demand Credit based on the PJM Base Residual Auction Rates and new contract termination dates.

Customer Impact: This tariff applies to customers under the rate schedules GS, GS-TOD, LGS, LGS-TOD, IP, MS, WSS, or EGH who have the ability to curtail load under the provisions of Rider D.R.S.1. See below for the comparison of the current and proposed curtailment demand payments.

Curtailment Demand Payment (\$/kW per month)		
Current (2024-2025)	Proposed (2025-2026)	Difference
\$3.12	\$4.93	\$1.81

Tariff Page(s) Affected: IURC No. 20, Original Sheets 36.1, 36.4, 36.5, 36.6, and First Revised Sheets 36.3 and 36.8.

Objection Summary: On March 13, 2025, Atlas Foundry Company, Inc. and Voltus, Inc. (collectively, “Objectors”) filed an objection to I&M’s 30-Day Filing, alleging that the methodology used to calculate the curtailment demand payment did not comport to that plainly stated in I&M’s tariff. Specifically, Objectors noted that the methodology calls for a four-year average of PJM’s delivery year clearing prices for the preceding delivery year, the current delivery year, and the subsequent two delivery years. Due to delays in PJM’s capacity auction schedule, Objectors recognize that executing the methodology is not currently possible but stated I&M arbitrarily replaced the subsequent two years, which are currently unavailable, with the two years prior to the preceding delivery years. Objectors stated that I&M has deviated from the approved methodology in their tariff since the tariff update for delivery year 19/20.

Objectors proposed two options as solutions: (1) use only the 24/25 and 25/26 PJM auction results to calculate the curtailment demand credit, leading to a price of \$4.54/kW-month; or (2) use the 24/25 and 25/26 clearing prices and a price floor for the 26/27 and 27/28 delivery years leading to a price of \$4.93/kW-month.

I&M Response:

On April 4, 2025, I&M filed Additional Information and an Amended Response to the Objection, stating that it had made a good faith effort to calculate the curtailment demand credit in light of the delay in PJM's Base Residual Auctions ("BRA"), which are outside I&M's control. I&M also included a table outlining the past five curtailment demand payments, stating the proposed payment is in line with the historic payments. Finally, I&M stated that Objectors' proposed solutions would be inconsistent with the approved tariff methodology and would negatively impact I&M's other customers, since either alternative would result in an artificially high curtailment demand credit.

I&M agreed to update tariff language to reflect that if subsequent delivery years are unavailable due to auction delays, I&M will use the most recent four-year average, to be updated if the subsequent delivery years become available during the current delivery year. I&M also committed to update the value of the curtailment demand credits once the future delivery year clearing prices from the 26/27 and 27/28 Base Residual Auctions are available.

Objectors' Reply:

On April 21, 2025, Objectors filed a Joint Reply to I&M's Amended Response, in which they requested the following: (1) a pause to the 30-Day Filing process to allow parties in this proceeding to receive information from the Federal Energy Regulatory Commission ("FERC") on whether its upcoming BRAs will be subject to a price floor; (2) for this filing, use the price floor if approved as a proxy for the subsequent two delivery year clearing prices; (3) memorialize in the tariff that in the case of missing auction information, I&M will use the Available Target Methodology (which utilizes only years both available and contemplated in the tariff methodology), to possibly be augmented with price floors if needed to improve accuracy; and (4) maintain I&M's proposed protocol to update remaining months' credit value if missing information becomes available during the delivery year in I&M's tariff.

Commission Response:

On April 24, 2025, the Commission responded to I&M, stating that Staff is unable to recommend approval, but the Commission would provide parties an additional 30 days to come to an agreement. If parties were unable to reach agreement within that 30-day period, I&M was instructed to either withdraw this filing or Commission Staff would recommend denial.

- I&M Response:** On April 28, 2025, I&M filed its response to Objectors' Joint Reply, in which they stated that, subsequent to Objector's Joint Reply, FERC issued an order in Docket No. ER25-1357, approving a price floor of \$175. I&M further stated that, given this development, it would agree to utilize that price floor to calculate the D.R.S.1 credit for the delivery years 26/27 and 27/28, as well as agree to modify its tariff to reflect that, in the case of missing auction information, updated FERC-approved price floors for future years may be used. I&M proposed that, if a FERC-approved price floor is not available for subsequent delivery years, I&M would use actual historical auction results to calculate a four-year average, which would then be updated if the subsequent delivery year(s) became available during the current delivery year.
- Resolution:** On May 13, 2025, I&M filed its Notice of Resolution of Joint Objection, stating that a resolution has been reached between the parties relating to the 25/26 delivery year only. I&M's D.R.S.1 tariff will be amended to show that for the 25/26 delivery year, the credit will be based on a combination of the most recent two auctions and the FERC-approved price floor as a proxy for each of the next two delivery years' clearing prices. I&M also agreed to promptly update pricing as new BRAs are run during the delivery year. I&M stated that Objectors do not object.
- Staff Recommendations:** Staff agrees with the Resolution. Requirements met. Recommend approval.

Submitted By: E. Curtis Gassert
Director, Water/Wastewater Division

Filing Party: **Brown County Water Utility, Inc.**

30-Day Filing ID No.: 50832

Date Filed: April 22, 2025

Filed Pursuant To: 170 IAC 1-6 & 170 IAC 6-5

Request: The utility submits an application for a Water Tracker resulting from a recent rate increase charged by their wholesale service provider, Jackson County Water Utility.

Customer Impact: See below.

Brown County Water Utility, Inc.	Current Charge	Proposed Charge
Water Tracker	\$0	\$0.06 per 1,000 gallons

Tariff Pages Affected: Appendix A

Staff Recommendations: Requirements met. Recommend approval.

Submitted By: Jane Steinhauer
Director, Energy Division

Filing Party: Northern Indiana Public Service Company LLC

30-Day Filing ID No.: 50833

Date Filed: April 28, 2025

Filed Pursuant To: 170 IAC 1-6-1

Request: Revised Rate Schedules for Rate 328 – Large Transportation and Balancing Service and Rate 338 – General Transportation and Balancing Service.

Customer Impact: See below.

RATE CLASS	CHARGE	PROPOSED	CURRENT	\$ INCREASE / (DECREASE) PER THERM OF BILLING DEMAND PER MONTH
RATE 328	MONTHLY DEMAND CHARGE - HP CUSTOMER	\$0.20066	\$0.21404	(\$0.01338)
	MONTHLY DEMAND CHARGE - DP CUSTOMER	\$0.17731	\$0.16764	\$0.00967
RATE 338	MONTHLY DEMAND CHARGE	\$0.34715	0.42200	(\$0.07485)

Tariff Page(s) Affected: IURC Gas Service Tariff, Original Volume No. 10, First Revised No. 74 and Original Sheet Nos. 75 and 93.

Staff Recommendations: Requirements met. Recommend approval.