

Indiana ENERGY Association

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Boonville Natural Gas Corp.

Citizens Energy Group

Community Natural Gas Co. Inc.

Duke Energy

Indiana Michigan Power

Indiana Natural Gas Corp.

Indianapolis Power & Light Company

Kokomo Gas & Fuel Co.

Lawrenceburg Gas Co.

Midwest Natural Gas Corp.

Northern Indiana Fuel & Light Co.

Northern Indiana Public Service Co.

Ohio Valley Gas Corp.

Vectren Energy Delivery of Indiana, Inc.

November 14, 2008

OFFICIAL COMMENT

#08-764 (Antidegradation)
MaryAnn Stevens
Mail Code 65-40
Rules Section
Office of Water Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Dear Ms. Stevens,

On behalf of the members of the Indiana Energy Association ("IEA") and individual non-member companies, including Dominion State Line Energy, Indiana Kentucky Electric Corporation, Wabash Valley Power, and Hoosier Energy REC, Inc., we appreciate the opportunity to provide comments on the Indiana Department of Environmental Management's ("IDEM") first notice of rulemaking concerning antidegradation standards and implementation procedures. The IEA is a trade association, whose membership includes 13 investor-owned electric and gas utilities and one charitable public trust gas utility, all operating in the state of Indiana. Collectively, the IEA members and individual non-members listed above are referred to in these comments as the "Indiana Utility Group" or "IUG."

The Indiana Utility Group takes this opportunity to provide our support on record for the comments submitted by Ms. Kari Evans on behalf of the Indiana Water Quality Coalition and the Indiana Manufacturers Association on this matter. The IUG particularly supports two suggestions made in those comments.

The first is that appropriate exclusions from full review be provided for facilities which have been required by state or federal regulation to install equipment to reduce air emissions and, because of these requirements, necessarily generate additional wastewater loadings. Ms. Evans' comments provide clear support for this position and we fully agree with those assertions.

THE VOICE FOR INDIANA ENERGY

Ms. MaryAnn Stevens

November 14, 2008

Page Two

The IUG would also emphasize the need for a reasonable and timely process for obtaining approvals. We agree with the assertions in Ms. Evans' comments that these rules must have a clear, step-wise process that includes reasonable timelines for approval. The utility industry requires regulatory certainty due to the substantial amount of planning, engineering and construction efforts associated with environmental controls at our plants. In addition, regulated utilities in particular must have regulatory certainty and timely decisions due to project approval and cost recovery requirements those utilities must pursue through the Indiana Utility Regulatory Commission.

Thank you for the opportunity to provide these comments. The IUG looks forward to continued participation in this rulemaking activity.

Respectfully submitted,


Stan Pinegar