

VIA EMAIL

April 2, 2024

Beth E. Heline
General Counsel
Indiana Utility Regulatory Commission
101 W. Washington St., Suite 1500 E
Indianapolis, IN 46204
(317) 232-2092

Re: LSA Document #24-90/Economic Impact Statement

Dear Ms. Heline,

Pursuant to Indiana Code 4-22-2.1-5(c)(2), as the Small Business Ombudsman for the state of Indiana, I have reviewed the proposed rule and economic impact analysis for small businesses associated with the rule changes contained in LSA Document #24-90 (proposed rule) proposed by the Indiana Utility Regulatory Commission (IURC) and found the following to be true.

Proposed rule LSA #24-90 updates rules found in Indiana Administrative Code (IAC) under 170 IAC 4-10 as authorized through Indiana Code 8-1-1-3, 8-1-40.5, & 8-1.5-3-8.3. Specifically, the proposed rule amends procedures and guidelines related to cost securitization of certain electric utility assets. Effectively providing investor-owned utilities (IOU) financing opportunities to lessen ratepayer burdens for facilities that are considered “stranded” or “retired” assets. Upon further review, the proposed rule will not impact small businesses, as it only applies to electric IOUs that are regulated by the IURC, of which none are considered small businesses. Furthermore, the proposed rule does not issue new reporting, compliance, or costs that would impact the regulated IOUs or small businesses.

With that said, the IURC’s provided economic impact analysis, regulatory analysis, and proposed rule display a proper due diligence and understanding of how implementation of will not impact small businesses located in Indiana. Based upon this statement and review, the Indiana Small Business Ombudsman supports the proposed rule related to the economic impact on small business if the IURC conclusion reflects the actual result after promulgation. If there are any questions about these comments, please contact me at ombudsman@iedc.in.gov.

Sincerely,

Matt Jaworowski
Small Business Ombudsman
Indiana Economic Development Corporation