

**Response of CAC, Earthjustice, and Vote Solar
to the Director's Draft Report for
NIPSCO's 2021 Integrated Resource Plan**

Submitted to the IURC on January 13, 2023

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Citizens Action Coalition of Indiana (“CAC”), Earthjustice, and Vote Solar appreciate the Director’s Draft Report on Northern Indiana Public Service Company’s (“NIPSCO”) 2021 Integrated Resource Plan (“IRP”), published December 5, 2022, as well as the opportunity to respond before the Director’s Final Report is issued. We concur with the Director that NIPSCO is at the forefront of resource planning in Indiana and that NIPSCO has made significant improvements in its IRP process. That said, there is always room for continued improvement. Our suggestions to that end were included in our comments on NIPSCO’s 2021 IRP. We look forward to working collaboratively with NIPSCO for the next Market Potential Study and IRP filing. Finally, as the Director said about the reliability analysis performed by NIPSCO, he “trusts that this process will evolve as we all learn going forward.”¹ NIPSCO’s contractor, Quanta, performed a similar analysis for the AES Indiana IRP and incorporated many of the suggestions we had made regarding the NIPSCO study. We view this as a very encouraging sign that the study will indeed continue to evolve.

We would like to offer the following comments to ensure there is continued collaboration and improvement between stakeholders and NIPSCO for the next IRP filing. One of the aspects of NIPSCO’s IRP process that the Director highlighted is that “NIPSCO developed its IRP with significant stakeholder input.”² As the Director states, “From the Director’s perspective, NIPSCO, like most utilities across the United States, is addressing unprecedented resource changes in an environment of extreme uncertainty regarding government policy, commodity prices, and technology.”³ We concur with the Director that there are significant changes that utilities are facing and need to incorporate into the planning process. We believe this underscores the need to seek input from stakeholders and to work collaboratively not just in the IRP process, but in subsequent, related steps such as RFPs. NIPSCO issued an RFP in 2022, but did not seek the input of stakeholders on the content of the RFP or the manner in which the capacity and energy requests were structured. In a conversation subsequent to the issuance of the RFP, NIPSCO seemed to agree to seek stakeholder feedback in the future. We look forward to the opportunity to continue a collaborative process with NIPSCO. NIPSCO has also indicated to CAC that it will provide an AURORA license in the future that would enable CAC and its consultants to view all of its modeling files. We appreciate the offer and will work with NIPSCO in the future to utilize this capability and information in our review.

We appreciate the collaborative approach that NIPSCO has undertaken with stakeholders and the willingness to engage with stakeholders on technical calls to address questions and solicit feedback. We encourage NIPSCO to continue this approach and work collaboratively with stakeholders to solicit and incorporate feedback in the next IRP and in related proceedings and analyses.

¹ Director’s Draft Report on NIPSCO’s 2021 IRP, page 27.

² Director’s Draft Report on NIPSCO’s 2021 IRP, page 4.

³ Director’s Draft Report on NIPSCO’s 2021 IRP, page 4.