



CITY OF SOUTH BEND
PETE BUTTIGIEG, MAYOR
OFFICE OF THE MAYOR

February 4, 2015

Dr. Bradley Borum
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500 E.
Indianapolis, IN 46204-3407
Re: Indiana Michigan Power Integrated Resource Plan

Dear Dr. Borum:

The City of South Bend files these comments on Indiana Michigan Power's integrated resource plan (IRP), submitted to the Indiana Utility Regulatory Commission in November 2015. This 20-year energy plan impacts South Bend, as well as Fort Wayne, Elkhart, Muncie and other communities that I&M serves.

The City of South Bend appreciates I&M's visible efforts to involve stakeholders in the IRP process. As a local government, we understand the value of reliable infrastructure, long-term planning of investments, and public engagement. We also value I&M's partnership with the City, which allows us to "make the basics easy" for our citizens and support local economic growth. We applaud I&M's recent significant investments in solar, wind, and natural gas that provide energy independence and diversification while reducing air emissions.

South Bend is home to citizens of diverse backgrounds, cultures, and means, each a valuable thread in the fabric of our community. We are laser-focused on empowering everyone in our community to thrive. Many of our citizens struggle with the day-to-day costs of living, including aging and poorly maintained homes and small businesses and utility bills that drain limited incomes and meager savings. I&M's investments in demand-side management (DSM) directly improve the financial stability of these under-resourced residents and business owners.

We would like to see an IRP that offered bold support for programs and policies that permanently reduce customers' energy costs, such as:

- low-income residential programs such as weatherization and retrofits,
- residential and small business programs such as energy audits, equipment rebates, direct install programs, and education and outreach,
- support for renewable distributed generation,

- tariffs that incentivize smart energy choices (including rooftop solar, electric vehicle charging, LED streetlights, and peak load shifting),
- training and incentives for schools, churches, local governments, and non-profit organizations, and
- continued investment in utility-scale renewable energy.

Studies suggest that investments in energy efficiency and load reduction are more cost-effective than traditional generation capacity¹ and have the added benefit of local jobs and economic activity. The proposed IRP indicates only 2% of the overall capacity will be provided by energy efficiency² and that I&M's investment in its efficiency program will be kept at current levels.³ The City encourages I&M to commit significant investment to DSM and renewable energy programs and policies. These activities should include specific, measurable, and time-bound goals and continue to challenge the status quo.

Outdated generation technologies can be kept running with the addition of expensive pollution controls, but the IRP's models suggests that leaving these old technologies behind likely won't increase financial risk or customers' costs.⁴ The December 2015 multi-year extension of the federal investment tax credit makes it even easier for I&M (*and* its customers) to choose renewable energy.

Energy efficiency and renewable energy should prove to be a smart financial investment on I&M's part. At the same time, a focus on clean technologies and reduced demand can provide personal financial stability for the people of South Bend, and a resilient, sustainable electrical system for the entire community.

Thank you for your consideration of these comments and for facilitating this public process.

Sincerely,



Pete Buttigieg
Mayor

¹ Molina, M. (March 25, 2014). The Best Value for America's Energy Dollar: A National Review of the Cost of Utility Energy Efficiency Programs. *American Council for an Energy-Efficient Economy*.

² Indiana Michigan Power. (November 2, 2015). Integrated Resource Planning Report to the Indiana Utility Regulatory Commission. Pg. 130

³ Ibid, Pg. 50.

⁴ Indiana Michigan Power. Pg. 126