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Citizens Energy Group

Community Natural Gas Co., Inc.

Duke Energy

Fountaintown Gas Co., Inc.

Indiana Michigan Power

Indiana Natural Gas Corp.

Indianapolis Power & Light Company

Midwest Natural Gas Corp.

Northern Indiana Public Service Co.

Ohio Valley Gas Corp.

South Eastern Indiana Natural Gas Co., Inc.

Sycamore Gas Co.

Vectren Energy Delivery of Indiana, Inc.

THE VOICE FOR INDIANA ENERGY

August 17, 2018

Via Fax

Ms. Beth Heline – bheline@urc.in.gov

Mr. Jeremy Comeau – jcomeau@urc.in.gov

Indiana Utility Regulatory Commission

**Comments of the Indiana Energy Association
Concerning the Commission's Proposed Modifications to
Integrated Resource Plan and Energy Efficiency Plan**

The Indiana Energy Association ("IEA"), on behalf of its investor-owned electric utility members, hereby submits one suggestion on the Commission's proposed modifications to its Integrated Resource Plan rules – specifically, a proposed modification to 170 IAC 4-7-2 (Integrated resource plan submission), to provide some flexibility into the timing of IRP submissions. Please do not hesitate to contact the IEA at (317) 632-4406 if you have any questions or need further information

Sec. 2.

(a) The following utilities, or their successors in interest, shall submit to the commission an IRP consistent with this rule according to the following schedule:

(1) By November 1, 2017, and every three (3) years thereafter:

(A) Indiana Municipal Power Agency;

(B) Hoosier Energy Rural Electric Cooperative; and

(C) Wabash Valley Power Association.

(2) By November 1, 2018, and every three (3) years thereafter:

(A) Duke Energy Indiana; and

(B) Indiana Michigan Power Company.

(3) By November 1, 2019, and every three (3) years thereafter:

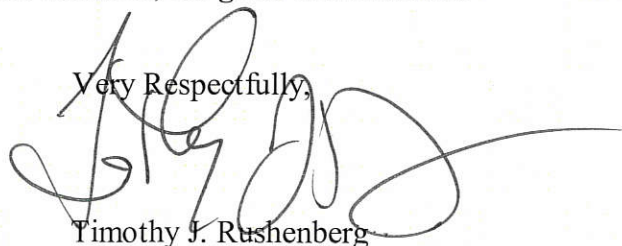
(A) Indianapolis Power & Light Company;

(B) Northern Indiana Public Service Company; and

(C) Southern Indiana Gas and Electric Company.

(b) Upon request of a utility, the director may grant an extension or modification of submission deadline, for good cause shown.

Very Respectfully,



Timothy J. Rushenberg
Vice President