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**INDIANA INVESTOR-OWNED ELECTRIC UTILITIES' MARCH 31, 2023  
COMMENTS/RECOMMENDATIONS ON FERC ORDER 2222**

Duke Energy Indiana, LLC, Indiana Michigan Power Company, Indianapolis Power & Light Company d/b/a AES Indiana, Northern Indiana Public Service Company ("NIPSCO"), and Southern Indiana Gas & Electric Company d/b/a Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (collectively the "Indiana Investor-Owned Electric Utilities" or "Utilities") appreciate the opportunity to provide further comments and recommendations concerning FERC Order 2222, specifically the IURC's preparations for a rulemaking concerning that Order. We recognize that the IURC has been and continues to be a leader among state commissions in identifying and discussing state issues related to the implementation of FERC Order 2222. Thanks to the IURC's initiative and timeline, Indiana is well-positioned for a robust consideration of pertinent rulemaking issues in a timely manner.

The Utilities recommend that Indiana stakeholders hold roundtable discussions on relevant FERC 2222 issues every other month. We recommend that topics for such roundtable meetings include the following non-exhaustive list of issues:

- Common definition of DER / what is permitted to be aggregated
- Implementation timeline
- Double counting (retail and wholesale)
- Necessary new monitoring equipment
- Need for updated interconnection standards
- Safety and reliability
- Generation interconnection issues — impact on interest in DERs stemming from modification to MISO compliance filing; supply-side developments; capacity accreditation; MISO's long range planning; interconnection path of least resistance
- Flexibility in interconnection regulations — non-serial application processing; best efforts review timelines; size limits; metering and telemetry requirements; prevention of speculative applications

- Aggregation enrollment/modification — customer protections; reliability under a 60-day clock; modifications;
- Operation oversight and control of DERs — functionality needs for distribution system; system configuration for system reliability and safety; override and dispute resolution; metering/impact on wholesale dispatch
- Aggregators as public utilities — customer protections; participation guidelines
- Cost recovery/allocation
- Adoption of IEEE 1547-2018

Respectfully submitted, on behalf of  
Indiana Investor-Owned Electric Utilities

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