

**Hoosier Energy REC, Inc.**  
**Submission of Comments on the IURC's Proposed Integrated Resource Plan Rulemaking**

At its October 18, 2012 Contemporary Issues Technical Conference, the Commission requested responses from all parties on a number of issues. With respect to the Commission's request, Hoosier Energy submits the following responses:

**1. Written comments on the Proposed Draft Rule.**

Hoosier Energy has no additional comments on the Proposed Draft Rule.

**2. The fiscal impact of the Proposed Rule to Hoosier Energy.**

Hoosier Energy estimates that the impact of the proposed changes to the Integrated Resource Plan rule will be as follows:

- Hoosier Energy anticipates using its corporate communications staff to develop the IRP summary document described in 170 IAC 4-7-4 (a). The estimated fiscal impact is \$5,000 - \$15,000.
- Hoosier Energy estimates that it will require substantial input from its Power Delivery staff to meet the additional requirements mandated in 170 IAC 4-7-4 (b) (10). The information in this section was previously provided through the submission of FERC Form 715. The estimated fiscal impact is \$15,000 - \$25,000.
- Hoosier Energy estimates that the requirements mandated in 170 IAC 4-7-6 will require additional input and support from its Marketing & Member Services, Power Delivery and Power Market staffs. The estimated fiscal impact of these requirements is \$10,000 - \$20,000.
- Hoosier Energy estimates that the requirements mandated in 170 IAC 4-7-8 will require additional modeling and consulting expenses. The estimated fiscal impact of these requirements is \$25,000 - \$35,000.
- Hoosier Energy estimates that the changes in the Proposed Rule will require additional legal expenditures. The estimated fiscal impact of these requirements is \$5,000 - \$15,000.

The total estimated fiscal impact of the proposed changes to the Integrated Resource Plan rule is \$60,000 - \$110,000.

**3. Input on the necessity of an Emergency Rule and supporting reasoning.**

Hoosier Energy supports the issuance of an Emergency Rule in this Integrated Resource Plan (IRP) Proposed Rulemaking by the IURC. Under the current IRP Rule, each individual utility is scheduled to file its IRP in 2013, which would require that the utilities begin their IRP planning processes almost immediately. This could potentially have the effect of stalling the rulemaking

process by limiting the availability of input from utility technical staffs. Implementation of an Emergency Rule would provide a degree of timing certainty to all parties, allowing those entities that are required to file IRPs in 2013 to begin their planning processes now. It would also allow the Commission to continue the development of the Proposed Rule until it can be promulgated.