

Public Comments on CenterPoint Energy Indiana South's 2025 Integrated Resource Plan (IRP) by Hoosier Environmental Council

Submitted on March 31, 2026

To the Indiana Utility Regulatory Commission:

We appreciate the opportunity to provide comments on CenterPoint Energy Indiana South's 2025 Integrated Resource Plan. We recognize the importance of this planning process in shaping Indiana's energy future and acknowledge the complexity of balancing reliability, affordability, and environmental responsibility.

1. Reliance on coal to address affordability concerns dismisses the importance of public health costs.

We want to begin by acknowledging that affordability is a significant and legitimate concern for CenterPoint's ratepayers. Many Hoosiers are already facing rising energy burdens, and it is critical that utility planning considers the real financial impacts on households and businesses. However, affordability cannot be considered in isolation, nor can it outweigh the broader and long-term risks to public health and environmental quality faced by all Hoosiers. Continued reliance on coal and expanded investment in natural gas infrastructure carry well-documented health impacts, including air pollution that contributes to respiratory illness, cardiovascular disease, and premature death. These impacts impose real costs—both economic and human—on communities across Indiana. From an environmental and public health perspective, the IRP raises concerns regarding the continued operation of coal-fired generation and the potential expansion of fossil fuel resources. While the plan emphasizes uncertainty and the need for flexibility, it risks locking customers into long-lived fossil investments at a time when cleaner, more cost-effective alternatives are increasingly available. This approach may expose ratepayers to future regulatory, fuel price, and carbon-related risks, while also delaying necessary progress toward reducing emissions.

2. Potential future policy should not justify delays in doing the right thing for Hoosiers.

The IRP suggests that future policy changes may become more stringent and uses this uncertainty, in part, to justify maintaining existing fossil fuel assets. We are concerned that this line of reasoning is fundamentally flawed. Anticipating that policy may tighten in the future is not a justification for continuing to operate the highest-emitting and most polluting resources in the present.

In fact, this approach creates a perverse outcome: it prolongs the operation of the very resources most likely to be impacted by future regulation, increasing the risk of abrupt, costly transitions later. Rather than mitigating risk, it compounds it—potentially leaving ratepayers exposed to stranded asset costs, compliance expenses, and rushed infrastructure investments under tighter timelines.

Sound utility planning should be proactive, not reactive. If future policy is expected to become more stringent, that is a clear signal to begin an orderly and cost-effective transition now. Delaying action only increases long-term costs and extends the period during which Hoosiers are exposed to harmful pollution. Moreover, this rationale fails to account for the current and ongoing public health impacts of continued fossil fuel operation, which exist regardless of whether or when new policies are enacted.

3. Centerpoint's transition to solar could be more impactful with greater ability to site what the model predicts.

We also want to acknowledge the important role that solar energy is beginning to play in CenterPoint's planning. Increased deployment of solar generation—particularly when paired with storage—represents a critical opportunity to reduce emissions, stabilize long-term energy costs, and enhance grid resilience.

However, the success of this transition depends not only on modeling and procurement decisions, but also on the ability to actually site and build projects in a timely manner. In Indiana, local siting barriers have increasingly delayed or blocked solar development, creating a disconnect between what utilities plan for and what can realistically be achieved.

If solar is to have its rightful place in the IRP process, it must be treated as a viable, dependable resource—not one that is implicitly discounted due to external barriers. This requires greater alignment between state-level energy planning and local siting practices. We encourage the Commission to recognize the growing importance of siting reform and to ensure that these constraints are addressed so that cost-effective, clean energy resources are not unnecessarily excluded from consideration.

4. Large out-of-state loads should not be treated as functionally equivalent to Hoosiers' energy needs, especially when Hoosiers bear the cost of pollution directly.

We are also concerned by the treatment of large load growth—particularly in the alternate preferred scenario—and the implications for resource selection. The IRP appears to treat large, often out-of-state commercial loads, such as data centers, as functionally equivalent to native residential and commercial demand. This framing warrants closer scrutiny.

Large load customers like data centers are not homes, hospitals, or Hoosier employers embedded in local communities. They are frequently owned by out-of-state corporations whose profits leave Indiana, while the environmental and infrastructure costs remain borne by Hoosiers.

The IRP's approach suggests that, in order to serve this load growth, CenterPoint may rely heavily on dispatchable fossil resources, including natural gas and even continued coal generation. This raises a fundamental equity and policy concern: why are Indiana

ratepayers and communities expected to absorb the pollution and public health impacts of fossil generation used to serve non-native, profit-driven load?

The pollution from these facilities does not follow the profits—it stays in Indiana. The health impacts, environmental degradation, and associated costs are borne locally, even as the economic benefits of these large loads often flow out of state. This dynamic risks creating a system in which Hoosiers shoulder disproportionate burdens without commensurate benefits.

We urge the Commission to apply greater scrutiny to proposals that rely on carbon-emitting resources to serve speculative or non-native large loads. At a minimum, such growth should not be used to justify the expansion or prolonged operation of high-emitting generation. Instead, large load customers should be required to align with cleaner resource strategies that do not exacerbate local environmental harms or undermine state policy goals.

5. Increases in energy efficiency and demand response are critical, positive steps for increasing both affordability and environmental sustainability.

At the same time, we commend CenterPoint for its increased emphasis on energy efficiency and demand response. These resources are among the most cost-effective tools available to reduce system costs, lower customer bills, and improve grid reliability. Treating efficiency and demand response as core system resources—not optional programs—is a positive and important step forward. Continued expansion of these programs can help mitigate the need for expensive new generation, reduce peak demand, and deliver immediate benefits to customers.

We commend CenterPoint for expanding this program in the near term and encourage CenterPoint to continue its significant investment in energy efficiency and demand response, especially to serve low-income customers.

Conclusions

Looking ahead, we encourage the Commission and CenterPoint to prioritize a resource strategy that accelerates investment in clean, non-emitting energy resources, including renewable generation paired with storage, while maximizing the potential of demand-side solutions. Such an approach can better protect public health, reduce long-term costs, and position Indiana for a more resilient and sustainable energy future.

In conclusion, while we recognize the challenges inherent in long-term planning, we urge a more decisive shift away from fossil fuel dependence and toward a portfolio that fully accounts for the health, environmental, and economic well-being of all Hoosiers.

Thank you for your consideration.
Sincerely,
Hoosier Environmental Council

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