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August 31, 2015

Beth Krogel Roads  
General Counsel  
Indiana Utility Regulatory Commission  
101 W. Washington St., Suite 1500 East  
Indianapolis, IN 46204

Dear Ms. Roads:

Hoosier Energy would like to thank the Indiana Utility Regulatory Commission for providing this additional opportunity to comment on its proposed Integrated Resource Plan Rulemaking. The amount of time that has passed since the last revision of the proposed rule in October 2012 allows all parties to take a fresh look at the proposed rule with the benefit of having conducted a full cycle of Integrated Resource Planning under the proposed rule. Following its review, Hoosier Energy recommends that the proposed rule be adopted as the Final Rule.

The IRP proposed rule was the product of 3 years of collaborative effort and discussion amongst numerous stakeholders, including the IURC, OUCC, the 8 Indiana electric utilities, industrial customer groups and various consumer groups. The process involved in arriving at the current proposed rule was both time-consuming and thorough. Each of the stakeholders has had numerous opportunities to comment on the proposed rule and present modifying proposals, both in public meetings and in comments submitted to the IURC.

While each of the stakeholders might find sections of the current version that it would change, to allow changes at this point is to open up the process for a complete review and reediting of the proposed rule. While the proposed rule may not be perfect, it appears that it is working as designed and that there is no need to change it at the present time. Each of the 8 Indiana utilities have submitted an Integrated Resource Plan under the current proposed rule, including conducting individual workshops as part of the public advisory process. In addition, each of the utilities has been critiqued on its adherence to the standards and procedures set forth in the proposed rule.

As set forth in 170 IAC-4-7-0.1(c)(2) of the proposed rule, Hoosier Energy Rural Electric Cooperative, Wabash Valley Power Association and Indiana Municipal Power Agency are exempted from the public advisory process requirement. At the July 30, 2015 Rule Development Workshop, a proposal was made to remove the exemption and require the three utilities to participate in the public advisory process. Hoosier Energy believes that this would result in a duplication of effort for the following reasons.

First, Hoosier Energy conducts monthly Board meetings at which issues related to resource planning concepts and strategies are discussed in an interactive manner, and at which Hoosier Energy's Board members and member system managers are encouraged to ask specific questions. Second, as an

integral component of its Board education efforts, Hoosier Energy conducts an annual Board Forum at which topical industry-specific issues are presented by industry experts and discussed with Hoosier's Board members. Finally, Hoosier Energy publishes an annual Long Range Resource Plan, which is an internal document that provides a 20-year forward look at its future capacity requirements and the resource options to meet these needs. Thus, through the combination of these efforts, Hoosier Energy is conducting its own public advisory process and should remain exempt from an IURC-mandated public advisory process.

Sincerely,

HOOSIER ENERGY RURAL ELECTRIC COOPERATIVE, INC.

A handwritten signature in black ink, appearing to read "Rich Gillingham". The signature is written in a cursive, slightly slanted style.

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