HOOSIER ENERGY
A Touchstone Energy® Cooperative

August 17, 2018

Mr. Jeremy Comeau
Assistant General Counsel
Indiana Utility Regulatory Commission
101 W. Washington St., Suite 1500 East
Indianapolis, IN 46204

Mr. Comeau:

With respect to the Indiana Utility Regulatory Commission's (IURC) draft Statewide Analysis of Future Resource Requirements for Electricity (Statewide Analysis), Hoosier Energy provides the following comments:

1. In Appendix 1, "Coal Fleet Currently in Operation", on P. 65 and 66, Line 7, Merom Unit 1 is owned by Hoosier Energy, not NIPSCO.
2. In Appendix 1, "Coal Fleet Currently in Operation" on P. 65, lines 7 and 10, per Hoosier Energy's 2017 Integrated Resource Plan (IRP), Merom's Net Demonstrated Summer Capacity Ratings are as follows:
    a. Unit 1 – 501 MW
    b. Unit 2 – 482 MW
3. With respect to Appendix 3, "Wind Purchased Power Agreements by Indiana's Investor-Owned Utilities", Hoosier Energy proposes that the Appendix also include those Wind PPAs entered into by Hoosier Energy, Wabash Valley Power Agency and Indiana Municipal Power Agency. Hoosier Energy's existing contracted Wind PPAs are included on P. 41 of its 2017 IRP and shows that it has contracted for 125 MW of Wind PPAs, which are in line with the amounts contracted by most of the Indiana IOUs.
4. With respect to the Solar Photovoltaic Generation information provided in Appendix 4, in addition to the ten 1 MW utility-scale solar installations provided in the Appendix, Hoosier Energy developed 12 small-scale renewable projects across the service territory. These projects were sized based upon what a member-customer might consider for their farm, residence or business. Hoosier Energy's web site (see link) provides the installed cost and access to generating performance data allowing the member to evaluate the long-term feasibility of small-scale wind and solar generation at their location.

    Link: https://hoosierenergy.com/about/energy-strategy/renewable-energy/

5. In Appendix 5, "Renewable Resource Summary", on P. 69, Hoosier Energy is credited with 13 MW of Coalbed Methane Capacity. As reflected on P. 39 of Hoosier Energy's 2017 IRP, Osprey Point's operations were suspended in 2016. Hoosier Energy is studying the feasibility of serving the units from an alternative fuel supply.
6. With respect to the information provided in Appendix 5, Hoosier Energy does not have access to SNL and would welcome the opportunity to review the capacity values that SNL assigns to its renewable resources in order to

determine the accuracy of the provided information. To that end, Hoosier Energy is providing its resource capacity information from its 2017 IRP as a reference in Attachment 1.

7. On P. 70, the "Small Wind Demos" column in the "Renewable Resource Summary with Details", does not capture the small wind demos that Hoosier Energy has developed and about which relevant information is contained in the above link in Comment No. 4.
8. Appendix 7, "Map of Generating Units" does not include Hoosier Energy's ownership of the Livingston and Orchard Hills Landfill Gas facilities, which are described on P. 38 and 39 of its 2017 IRP.
9. The Statewide Analysis does not include significant language regarding the Demand Side Management efforts of the Indiana utilities. Hoosier Energy and its member distribution cooperatives have developed a number of demand response and energy efficiency programs, which are detailed in its annual Demand Side Management Report. These programs include Residential Lighting, Residential HVAC, Duct Sealing and Attic Insulation, and Commercial and Industrial Programs. Hoosier Energy's 2016 DSM Report was provided as Appendix F to its 2017 IRP and a link to its 2017 DSM Report is provided below.

   Link: https://hoosierenergy.com/wp-content/uploads/2018/06/2017_DSM_AnnualReport.pdf

   In addition, Hoosier Energy implemented new wholesale tariffs designed to encourage demand response participation by the member systems and to introduce time-of-use energy pricing. The tariffs are also designed to provide the G&T with tools to better manage costs during periods of high demand and market prices and to promote consumer-owned distributed generation, including the purchase of consumer power by Hoosier Energy.

Regards,

/s/ Richard Gillingham

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Attachment 1 – Hoosier Energy's Resource Capacity Information

Resource	Type	Nameplate Capacity (MW)	Net Demonstrated Capacity (MW)	ISO/RTO Unforced Capacity (MW)
Merom 1	Coal	535	501	455
Merom 2	Coal	535	482	438
Holland	Gas	315	307	301
Worthington	Gas	174	169	163
Lawrence	Gas	176	175	166
Clark-Floyd	Landfill Gas	4	4	4
Livingston	Landfill Gas	15	13	11
Orchard Hills	Landfill Gas	16	16	14
Solar Units	Solar	10	10	5

Table 1: Hoosier Energy's Owned Generation Summary

Resource	Type	Expires	Contracted Capacity (MW)	ISO/RTO Unforced Capacity (MW)
Duke Indiana	Slice of System	2023	100	100
Duke Indiana	Slice of System	2025	50	50
Story County	Wind	2019	25	0
Dayton Hydro	Hydro	2031	4	2
Rail Splitter	Wind	2029	25	4
Meadow Lake	Wind	2037	25	4
Meadow Lake	Wind	2039	50	8
Solar PPA *	Solar	2039	100	19
Solar PPA *	Solar	2039	100	19

* - pending

Table 2: Hoosier Energy's Power Purchases Summary