



Indiana Michigan Power Company (I&M) hereby submits the following Responses to the Commission's questions regarding Net Metering Programs:

1. How does your utility presently communicate to potential customers the program's availability?

Indiana Michigan Power Company (I&M) communicates information on available net metering program offerings through multiple channels. The primary communication channel is the Company website, www.indianamichiganpower.com. Specifically, the site offers an entire page dedicated to providing resources and information to customers interested in installing generating equipment (see: <https://www.indianamichiganpower.com/builders/GeneratingEquipment.aspx>). This page includes links to the Indiana Net Metering Service Packet, the I&M Customer Guide for Interconnection, and the necessary Indiana Interconnection Applications. The website also lists the name and contact information for the customer service representative in charge of interconnection and net metering applications, provides links to other resources, and hosts the current Indiana tariff book for I&M. Additionally, members of the Customer Solution Center are trained to direct customer calls inquiring about net metering to customer service representatives.

2. Does your utility provide public access to program availability on its website?

Yes, see answer to question above.

3. How, if at all, does your utility inform potential customers of the remaining availability of the program in terms of the statutory capacity thresholds?

In compliance with 170 IAC 4-4.2-9(c), I&M submits an annual Net Metering Report to the IURC. In the most recent Report, filed March 1, 2019, I&M was significantly below the capacity thresholds for each of the statutory categories and does not view this as an imminent concern. I&M does monitor its capacity threshold for each category and does not project this to be an issue in the near term. I&M will monitor this progress and inform customers through the application process if the cap for any of the categories starts to close in on the threshold.

4. If so, how often is the availability updated? (weekly, monthly, etc.)

I&M files annual net metering and interconnection reports with the IURC; however, the interconnection and net metering data is updated on a quarterly basis for internal tracking and review.

5. What, if any, limitations are there to providing public access to the program availability in such a context?

I&M currently uses internal systems to track and maintain the net metering program that do not have built in reporting features. In order to generate reports and make this information available publicly, I&M would incur costs that may not be warranted by the low demand for this information.

6. To what extent does your utility facilitate a queue for requests to participate in the program?

I&M maintains a queue based on the timestamp of each application received by the company that meets the minimum application requirements. To avoid filling the queue with unexecuted applications, I&M will remove applications that have not been diligently pursued after notifying the customer of the need to timely complete the process.

7. If you use a queue, what are the minimum requirements that must be satisfied by an applicant in order to be added to the queue?

I&M requires an application for interconnection to contain all required documentation, including: electrical one-line diagram, site diagram, specification sheet, proof of liability insurance coverage, and the applicable application fee. I&M requires all documentation to be complete and accurate prior to the application for interconnection entering the queue.

8. If you use a queue, how is the queue status communicated to the other potential customers?

The queue is tracked internally, and since I&M is still significantly under the capacity thresholds, there has been limited demand for this information. Inquiring potential customers or developers would be directed to the most recent annual Net Metering Report filed with the IURC, or advised of the status directly by a customer service representative.

9. What, if any, limitations are there to providing public access to the program queue in such a context?

Limitations include the cost of providing the access and the potential for information overload to occur on websites. Given that I&M is not close to the capacity thresholds, there may be little benefit to incurring further costs to publicize the program queue. The Commission website may have the potential to house the information provided by the companies and make it accessible to the public.

10. Are there other options your utility has availed itself of to address availability transparency?

I&M currently has a project under development to facilitate queue management and automate the interconnection application process. This project would allow I&M to have a well-maintained queue that provides customers and developers with timely status updates, and allow I&M to keep the queue in good order.

11. Are there other approaches your utility would suggest we explore to address availability transparency?

I&M would recommend that the annual Net Metering Reports be added to the IURC and UCC websites. Additionally, the Commission could create an email subscription list to ensure that interested parties and vendors would receive the Annual Reports.

12. How would your utility suggest customer requests are managed when the availability of net metering to them may be limited because of the statutory reservations?

If it becomes an issue, applications will be processed according to each customer's place in the queue. I&M would also consider offering a distributed generation or energy storage tariff for those customers not able to be served under the Net Metering Service Rider.