

Indiana ENERGY Association

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Sycamore Gas Co.

Vectren Energy Delivery of Indiana, Inc.

THE VOICE FOR INDIANA ENERGY

November 1, 2018

Ms. DeAnna L. Poon
Assistant General Counsel
Indiana Utility Regulatory Commission
101 West Washington Street
Suite 1500 E
Indianapolis, Indiana 46204

Submitted via email: dpoon@urc.in.gov

Dear Ms. Poon:

The Indiana Energy Association, on behalf of its investor-owned electric and natural gas utility members, hereby submit our comments on the cost and savings impact of complying with the Draft Proposed Rule in IURC Rulemaking #18-02 (formerly #15-02), concerning the procedural rules and ex parte rules of the Indiana Utility Regulatory Commission.

1. Are you a state or local government? If so, please respond to the questions below considering increases in revenues, expenditures, appropriations, and distributions.

No

2. Are you a small business, defined by IC 4-22-2.1-4 as a business where on at least 50% of your working days occurring during the preceding calendar year, your business employed not more than 150 employees and the majority of your employees work in Indiana?

No

3. How many customers/constituents/businesses/etc. do you have in Indiana?

The IEA is the trade association of the 14 investor-owned electric and natural gas utilities in Indiana. In total, our member companies employ about 11,500 individuals in the state and serve about 4,000,000 Hoosiers.

In assessing the financial impact, we request information on the following:

1. What direct savings do you see as a result of the new procedural rule? This could include but is not limited to savings in printing, mailing, courier service, and overtime costs.

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IEA believes removing the requirement to provide hard copies will result in some savings, but we have not quantified them and do not believe them to be material.

2. What direct savings do you see as a result of the new ex parte rule? This could include but is not limited to research costs and costs for professional services like legal and accounting.

IEA does not anticipate significant cost savings because of the new ex parte rule.

3. What indirect savings do you see because of the rule? This could include but is not limited to changes and additions regarding settlement, mediation, and confidentiality.

IEA does not anticipate significant indirect cost savings as a result of the rulemaking.

4. What direct costs do you see as a result of the new rule?

IEA does not anticipate significant added direct costs because of the rulemaking.

5. Are there any changes to the rule you suggest specifically as a cost-saving measure?

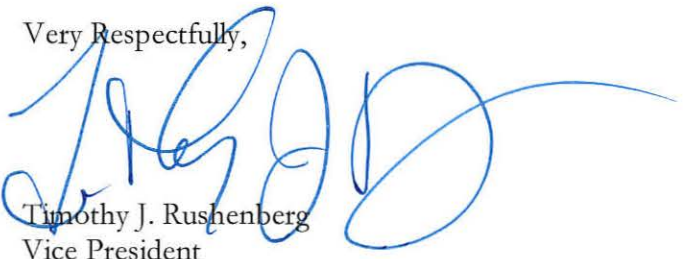
No

6. Are there any other changes you suggest to the rule?

No

Please do not hesitate to contact me at (317) 632-4406 if you have any questions or need further information.

Very Respectfully,



Timothy J. Rushenberg
Vice President