



**INDIANA INDUSTRIAL ENERGY
CONSUMERS, INC.**

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DeAnna Poon
Indiana Utility Regulatory Commission
101 West Washington St., Ste. 1500 E
Indianapolis, IN 46204
Email: DPoon@urc.IN.gov

Re: Comments on Rulemaking RM #18-02, Practice and Procedure Before the
Commission

Dear DeAnna:

Please accept the following comments with regard to the Commission's Rulemaking from Indiana Industrial Energy Consumers, Inc. (INDIEC).

With regard to 170 IAC 1-1.1-3, INDIEC recommends that the filing date for any document filed electronically with the Commission be the date that the document is actually filed, not the date that the notice of acceptance is emailed to the filing party. This is the current Commission practice, and embodiment of the current practice in the Rule will help reduce confusion among practitioners and reduce unnecessary and wasteful litigation over whether a filing is "timely."

It is my understanding that such a clarification is already being considered, and INDIEC looks forward to working with the Commission on that issue.

With regard to financial impact of the proposed rule, INDIEC does not often participate directly in Commission proceedings. Nevertheless, Lewis & Kappes does serve as INDIEC's counsel in those instances in which the organization does participate; and Lewis & Kappes frequently appears on behalf of INDIEC members either in the individual capacity or as members of a utility-specific Industrial Group.

Speaking in the role as counsel for INDIEC, we believe the ability to electronically file documents provides net cost savings to INDIEC members based on the reduction of time and resources related to costs of printing, copying, and delivering paper documents to the Commission. Electronic filing will also streamline the review process of filed materials and reduce the need for, and related expense of, managing and protecting large volumes of paper documents.

If we can provide any additional information, please feel free to contact me.

Regards,

/s/ Joseph P. Rompala

Joseph P. Rompala
Legislative Director, INDIEC