January 12, 2016

Dr. Bradley Borum
Director of Research, Policy and Planning
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500 E.
Indianapolis, IN 46204-3407

Dear Dr. Borum:

I'm writing to express my concern with I&M's proposed plan to have the AEP Rockport plant – the sixth largest carbon polluter in the U.S. – continue to operate for at least another 20 years. Instead of investing in clean energy such as solar and wind, the plan calls for spending more than $6 billion during the next 20 years to retrofit and install expensive pollution controls and lock us into an outdated technology for years to come. I&M could have chosen to end the lease on Rockport Unit 2 when it expires in 2022 and end this reliance on fossil fuels.

It's unnecessary to lock us into another 20-40 years of carbon dioxide (CO_2)-emitting fossil fuel consumption for electricity generation. Global CO_2 concentration in the atmosphere is over 400 parts per million (PPM). At the beginning of the industrial revolution it was around 280 PPM. Using U.S. government data it is possible to project future growth in this concentration. A straight-line projection shows that we will pass 450 PPM by 2040. At this level, scientists predict that positive feedback mechanisms in the global climate system will lead to catastrophic runaway global warming that human intervention can no longer halt.

To forestall this eventuality, we must utilize renewable, carbon-neutral sources of energy to replace the combustion of fossil fuels (coal, oil, and natural gas) to power our society. Committing to recovery of the amortized capital costs of building new or refurbishing/retrofitting existing fossil-fuel-powered power plants will lock us into a deadly delay in the conversion to renewables. It doesn't have to be this way. The use of solar, wind, efficiency, and conservation are available now and their use is growing exponentially.

In 2013, 98.4 million metric tons (MMT) of carbon dioxide were emitted in Indiana by generating electricity with fossil fuels (of this 95% (93 MMT) was from coal). This was almost 50% of CO_2 emissions derived from <u>all uses</u> of fossil fuel combustion and more than double emissions of 40.9 MMT from transportation (gasoline, diesel, compressed natural gas or propane).

For the same period, Indiana was 7th among states in energy-related CO_2 emissions. Fossil-fuel powered power plants in Indiana are a significant source of U.S CO_2 emissions. These emissions must be brought to zero by 2050 to avoid catastrophic climate change. This can only be accomplished by rapid retirement of all fossil-fuel-

powered power plants and their replacement with renewable energy sources – the opposite of what I&M's plans for the Rockport plant. I&M should work to retire the Rockport plant and instead invest in renewables along with conservation and efficiency initiatives.

John W. Vann, Ph.D.
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Ball State University Council on the Environment

Source for Indiana emissions information: U.S. Energy Information Administration, http://www.eia.gov/environment/emissions/state/analysis/