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Members of the IURC:

Thank you for the opportunity to express these comments concerning the Vectren South 2014 IRP dated November 1, 2014.

By virtue of the monopoly granted to Southern Indiana Gas and Electric Company (dba Vectren South) to operate in its designated area, Vectren South is required to be transparent in its operation and management and must submit to oversight by the public and their representatives. Part of that oversight process includes the submission of an Integrated Resource Plan (IRP) that Vectren South is required to file with the Indiana Utility Regulatory Commission (IURC) covering a twenty year planning horizon that is to be updated every two years. The IRP must detail Vectren South plans for the continued, reliable and cost effective production and distribution of energy products within its assigned service area.

The IRP process purports to allow all stakeholders to have input into planning and seeks to expand the perspective with which Vectren South may operate in the near and long term. Also, the IRP is a somewhat speculative reporting tool that may and should contain information for many different scenarios that may significantly affect operations. To comply with Indiana law, the IURC and the Office of Utility Consumer Counselor (OUCC) have an interest in making sure the Vectren South 2014 IRP is a reasonable document and is in the best of the public. It is therefore in the interest of all stakeholders that Vectren South deliver an IRP that summarizes its plans in a manner that a non-technical audience may understand in order to properly evaluate the effectiveness of operations and suggest alternate strategies that benefit both Vectren South and the ratepayer.

In reviewing Vectren South's 2014 IRP it is most telling in what it does not say. The IRP does not say that Vectren South will invest in and support cleaner renewable technologies wherever and whenever it is feasibly possible to do so. The IRP does not say that Vectren South is withholding information it deems proprietary or confidential (IURC Cause 44556) and refuses to disclose information necessary to provide a proper IRP. Vectren South's 2014 IRP does not say that its customers pay the fifteenth highest electric service delivery rates in the nation and has a plan to reduce those costs to the captured ratepayer. So much information was omitted from the IRP that it produces many doubts about the veracity of the conclusions reached by the Vectren South 2014 IRP. In essence, Vectren South's submitted IRP is a product that attempts to fulfill a legal requirement under Indiana law but does not provide much information in a way the public (non-technical audience) may find useful or informative.

As a member of our community, Vectren South has an obligation to provide a product that is benign to the environment and does not harm the health of the community. Even with modern pollution abatement technologies installed on Vectren South's existing coal fired electric generation facilities they still contribute to anthropogenic climate change and emit poisons into the environment assisting disease development within the community. We cannot ignore the harmful effects of the coal fired electric generation process or turn the clock back to a time when the effects of these processes were unknown. In this context, only an absolute minimum of healthy and environmentally friendly measures were embedded in the IRP by Vectren South to mitigate the degenerative effects of these coal fired facilities upon the population. As a result, the Vectren South 2014 IRP shows a zealous fixation on extending the life of its coal fired electric generation facilities by failing to create any near or long term capital investment plan for any future clean and renewable energy generation facilities.

Also absent from Vectren South's IRP was information that impacted future Demand Side Management (DSM) considerations due to forthcoming Mercury and Air Toxics Standards (MATS) rules being finalized. The same was true for newly issued Environmental Protection Agency CO2 Clean Power Plan draft rules. Instead of using the opportunity of forthcoming EPA MATS rules and the EPA Clean Power Plan draft rule to do any planning, Vectren South chose to ignore these important new toxic environmental safeguards and their impact on Vectren South operations.

Just before Vectren South submitted its IRP, IURC Cause 44556 was filed that claimed some Technical References about its wholesale electric operations were confidential. It is questionable that the confidentiality of this information is in the best interest of the public and ratepayer. IURC Cause 44556 is especially onerous since electric rates are much higher within Vectren South's service area than the Midwest Independent System Operator's (MISO) entire service area. This effectively forces Vectren South ratepayers to subsidize wholesale operations to MISO without understanding the nature of the subsidy. In all these cases, information was omitted that should have been included and used to provide a document that creates a meaningful IRP.

Lastly, Vectren South's 2014 IRP does not state that any planning path contained within the Plan will reduce excessive ratepayer charges except to say that the IRP entails a "plan for the future with an emphasis on keeping costs as low and fair as possible for all customers". It should be noted here that according to a recent survey (National Electric Rate Survey - [www.les.com](http://www.les.com)) Vectren South electric rates are the fifteenth highest in the United States. Captive ratepayers need not suffer the "Stockholm Syndrome" when Vectren South states that it is doing everything possible to achieve lower utility rates when the opposite truth prevails.

These omissions in reporting fail to serve in the best interest of the public and are conspicuously missing from Vectren South's 2014 IRP. In summary, the Vectren South 2014 IRP falls well short of a meaningful near or long term plan that a non-technical audience may effectively use.

Regards,

Mark J Bryant