

**IN VCEPS Stakeholder Meeting with
INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR (OUCC) – July 21, 2011**

See handout from OUCC.

IURC Question re: Section 4 and handout: If the existing clean energy resources of those utilities that were first movers are not counted, does that reward those utilities that waited to act?

Answer: Utilities used sound business rationale in their decisions to add their existing clean energy resources. Those decisions were not based on the new IN VCEPS standard, so they are not harmed because they made those decisions before this statute was enacted.

The deadline for determining whether a clean energy resource counts toward the goal should be the date the utility applies to participate in the program.

Whether the utility was using clean energy resources prior to the IN VCEPS program could be a factor in determining whether and how much of an incentive the utility should receive.

Regarding Section 12(c)(2) requirement of being within the same regional transmission organization (RTO), “an” equals any electricity supplier, so clean energy resources and credits would count whether they were in the MISO or PJM footprint.

IURC: Both PJM and MISO have energy credit tracking systems that can track according to the statutory requirements and allow for Indiana only credits. See, for example, www.pjm-eis.com.

Section 11 – two phase docketed proceeding – Phase I would be the program application; Phase II would be the incentive application. The OUCC does have concern regarding potential regulatory gridlock, but the process needs to assure that the utility’s plan passes muster.

The IURC has processes like the rocket docket and the small utility process.

In order to make the “reasonably be expected” determination, it needs to look at, as factors, the assumptions used in the modeling, the range, and the risk involved.

The process should be similar to the CPCN process – for which there’s a roadmap in IC 8-1-8.5.

No double incentives – activity could count toward goal, but utility should not receive incentives under more than one statutory provision for the same activity.

IURC Question: Does the OUCC want all the utilities to participate? Answer: Qualified yes – subject to development of program consistent with OUCC handout comments.

The OUCC is planning on submitting written comments by the August 15th initial deadline for comments relating to rule development.