SUMMARY of the
INTEGRATED RESOURCE PLANNING TECHNICAL CONFERENCE
Held on SEPTEMBER 22-23, 2011
In GOVERNMENT CENTER SOUTH CONFERENCE ROOM 22

NOTE: Headings and numbered items were in part of IURC handout and agenda; summary comments/responses are bulleted.

DAY 1 – September 22, 2011

SESSION I: INTRODUCTION AND OVERVIEW

Objectives of updated Rule include:

1. Assure that IRPs are the best product possible, resulting in a preferred portfolio of supply side and demand side resources which:
    a. Represents the most cost-effective life cycle resource plan by accounting for risk mitigation; and
    b. Is the most robust under a wide range of potential futures.
2. Increase the value of the IRP to the utility, the IURC, and other stakeholders
3. Increase transparency and confidence in the IRP process
4. Leverage resources by harmonizing IRP with other requirements

Objectives of Technical Conference include:

1. Obtain input from a wide range of stakeholders
2. Provide venue for collaboration through participation and discussion
3. Provide a basis for a "strawman" draft Rule

Ground Rules:

1. Everyone participate and be heard
2. Be respectful of each other
3. Desire sharing and discussion, but not speeches

Purpose, Value, and Usefulness of IRPs

1. What have the purposes, uses, and value of the IRPs been to date?
    - Educational process
    - Indicative planning tool
    - Report on ongoing business planning process
    - Snapshot in time – assumption on that date
    - Not a commitment to spend money
    - Short-term capacity needs
    - Long-term – what considering
    - Plans to meet environmental requirements and resource needs
    - Clean energy standards and goals
    - IRP used as a starting point when looking at other filings
    - IRP serves as a starting point for the planning processes for utilities
    - IRP doesn't "get into the weeds"
    - Informational document – basis for communicating to other parties
    - Brings the utilities together – communication among themselves
    - Not an opportunity for others to tell utilities how to plan generation
    - Changes over time – snapshot only – no value over longer term
    - Process to meet IURC IRP requirements
    - Internal utility look only
    - Used to be more isolated, internal approach but finding recently more external value
    - Demonstrates analytical process, the decision-making foundation

2. What should the purposes, uses, and value of the IRPs be? How can the value and usefulness be enhanced?
    - Improve communication – accessible on website, find out what process is, meet with interested parties to discuss plan
    - Make publicly available and increase accessibility (e.g. interested parties have had trouble finding IRPs on websites)

- Post-report technical conference – explanation; meet with interested parties
- Shortening the IRP – data requirements
- 20 year out – too long – just a guess
- 5-10 years; others say must be minimum 15 years
- No need to change the purpose but could change certain technical elements
- Better express IURC expectations of what IURC would like to see, which will help shorten and economize the IRP
- Allow electronic submittals
- Little value to short term action plan as currently done
- Clarify confidentiality
- Harmonize the efforts of various reports
- Not as technical
- Customer input from their perspective regarding demand going forward
- How long before an IRP is stale? Too long between filings is problematic because data is constantly changing (1-3 years appropriate)
- Have utilities use consistent data
- Looking at IRPs side by side
- Value in looking at in broader terms; more than just single utility basis
- External audience – IDEM – need to know re assumptions
- Non-technical audience – to understand general direction of resources in the state
- Credit-rating agencies view IRP process favorably.
- Regionalize IRP process
- It would be good to bring utilities together to work on planning process together.
- IRP should not be form over substance.

- Improve transparency in the process (for communication and review benefits) – possibility of OUCC getting data and finding comparability

Who wants this information?

- MISO/PJM
- Large industrial customers
- Other agencies (e.g. DHS, IDEM)
- Summary: civic groups and policymakers

MISO

- regional resource planning for robust transmission planning –
- IRP could provide some information to MISO
- regional could give some input to IRP particularly re assumptions
- Less capacity needed when looking at a larger region; regional-scale resource planning is more economic, identified capacity overbuild in regional analyses (fragmented IRPs do not adequately capture opportunity costs)
- Shorter time frame makes larger capacity investments (coal, nuclear) harder to plan for
- If same data base and assumptions, can have a regional look

PJM

- Haven't really seen the IRPs; get input through stakeholders groups
- Most economic solution looking at all resource types
- IRPs from various states would be informative by helping to firm assumptions based on a set document that can be referenced
- Useful input in developing various scenarios
- Load forecasting done on zone basis (i.e., AEP zone) not on a state basis

Ideal Relationships for Various Requirements and Processes

1. Consider, as a minimum, the IRP, CPCN, DSM, RTO, Summer Preparedness reviews and VCEPS requirements. What should be the relationship between the IRP and these or other processes?
    - IRP is an input into any CPCN proceeding
    - Summer Preparedness review – not seen as providing value (in part because reporting is in May, which is late in planning process), instead provide an update on the IRP; if an input to the IRP changes, could discuss the changes and the impact on resource planning; do in March, instead of May (May is a little late); if capacity shortfall, could report on issuing RFPs
    - Provide update on changes in assumptions made in IRP
    - IRP = supporting document that feeds into CPCN or VCEPS; provides the background, could serve as utility accountability check
    - Timing being off between the various proceedings types
    - Jumping off point to other types of proceedings

2. What recommendations do you have to improve the harmonizing of these requirements and the leveraging of efforts?
    - Have stakeholder input in IRP process (much like DSM oversight boards) so at least understand positions of the parties
    - Harmonize – have stakeholders give input into IRP process so that you can understand upfront the position of the parties; also need to know what the IURC's requirements are for similar/comparable reporting in order to find ways to leverage efforts.
    - Consistent and known expectations of the IURC needed by reviewers and utilities
    - Be able to compare IRPs side by side – consistent and known expectations would help this; but standardizing format may be difficult to incorporate utility's unique characteristics

- Make the IRP a summary document; don't spend all the time on the big data report; more detail when making CPCN or other filing.
- Common timing and physical aspects of the IRPs; run one main report with annual updates.
- Post-IRP review with IURC (e.g. "IRP Summit"), so Summer Preparedness would not have the data requirements.
- Shorter meeting could start with MISO and PJM perspective with utilities then giving their reports.
- Timing of IRP doesn't harmonize with other proceedings, but timing continuity is beneficial to check consistency of treatment of inputs in IRPs with other proceedings
- Filing of IRP in Nov/Dec - good time to focus on IRP
- Budget and other utility-internal time frames – need to discuss the timing of the IRP

SESSION II: COMPLIANCE REVIEW, ENFORCEMENT, AND SECONDARY OBJECTIVES

Compliance Review

1. IURC Presentation – see slides # 1 to 7 of attached PowerPoint.
2. Should there be any change to the existing comment and review process? If so, what changes should be made and what would be the value of the change?
    - IURC website – need to be able to find the IRPs and the IRP process
    - Currently, IRP and CPCN are related but have different purposes
    - Now, silence from IURC means acceptance; deficiency letters are issued if all the filing requirements are not met, but is only a communication tool (no teeth)
    - Silence is not golden; utilities need to have timely feedback as to whether the IRP is okay.

- Compliance process should reflect that utilities are not asking for anything at IRP time
- If compliance review and/or enforcement becomes more stringent, utilities would like an early symbol of compliance
- Must have balance and accountability
- Need annual update, which can isolate what has changed since IRP was developed and there won't be surprises at CPCN time
- Docketed proceeding?
- Coordination regarding IRP and updates (in same docket?)
- If the IRP is not robust enough, the integrated objectives of IRP are shorted in the CPCN process that simply focuses on the one facility (harder to go back and review IRP during CPCN proceeding). It is important to have a robust and reasonably vetted IRP to understand the whole integrated process and then to examine what has changed. IRP should be reviewed in mindset that utilities will be seeking cost recovery later based on IRP.
- Review can take a long time and at its conclusion conditions will have changed

3. What should acknowledgement/acceptance of the IRP by the Commission mean?
    - If IRP has prudency implications, will affect review process and how parties approach IRP; concerns over prudency implications (e.g. pre-approval) need to be addressed
    - Timing so known prior to the next IRP process whether IRP is sufficient
    - Would be good to get a response within a specific time frame; so know prior to next IRP
    - Commission could make requests re next IRP

4. What are the implications for how IRP relates to resource proceedings?
    - IRP are high level; not the detail needed in resource proceedings – so should affect cost recovery
    - IRP is snap shot in time; CPCN is the implementation proceeding when it is necessary to get into greater detail
    - IRP = internal guidance for utility; different burden of proof than a CPCN proceeding
    - IRP must be robust enough regarding integrated planning; CPCN is about a smaller subset of planning. IRP helps to understand the whole integrated process and helps to understand what has changed by the time of the CPCN.
    - How to adjust for variation over time between IRP done and when CPCN is requested
    - Annual summary update re IRP for major changes
    - CPCN specific data for project; anything that has changed from IRP that impacts the change in data and conclusions
    - If IRP is made to be too critical in prudence review, then perhaps difference in willingness to provide information

Enforcement

1. What are possible enforcement mechanisms?
    - Rule compliance enforcement vs. utility action (prudency gauge) enforcement (emphasis here on former)
    - IRP is snapshot, living document with changes over time – why is enforcement needed – as long as information is being shared and open and transparency
    - Deficiency letters – utilities have always complied
    - If no enforcement then plan is pro forma, doesn't pull weight in later proceedings
    - Comparison of plan vs actual – differences should be explained

- Snapshot – more of a slow motion movie – planning is dynamic, but report is a snapshot
- Nothing needs to change re enforcement
- Customer files complaint – not regarding plan but whether requirements of rule and inputs were met
- Mechanism to address issues and concerns – may be resolved through a stakeholder process – not an enforcement action
- Open transparent stakeholder review reduces need for a "stick"; e.g. DSMCC has stakeholder process resolve disputes
- Governance re the rule
- Deficiency letter process has worked, however easier to address deficiencies if utilities notified in developmental stage; the better the job done on IRP, the easier the certificate process
- If carrot is big enough you don't need a stick (de facto enforcement if cost recovery proceedings tied to IRP)

2. What enforcement mechanism is most likely to assure IRPs result in the most robust portfolio for planning, as well as being the basis for other proceedings?
    - Perhaps the acceptance or acknowledgement of the IRP by the IURC could be like a report card, just "complete" or "incomplete" and give reason.
    - Enforcement is not necessary – no problem so far with compliance.

Secondary Objectives

1. Should the IRP have secondary objectives?
    - Primary IRP objective is about reliability and costs.
    - "End of life", decommissioning, retirement, in overall life cycle – not just what should be added; but what units should be retired.
    - Life cycle and retirement are considered in existing IRP

- If IURC has a direction it would like to see the IRPs go in, then that needs to be communicated to utilities.
- Secondary objectives = how to determine tie breakers
    - E.g. environmental considerations and critical infrastructure protection (CIP)
- Could be like the scenario approach in the existing rule

2. How could the following issues be addressed within the IRP process: reliability, critical infrastructure protection, environmental impact/social cost? Any other factors?
    - Already included – not "secondary" – instead primary objectives
    - Commission needs to communicate expectations

SESSION III: TREATMENT OF RESOURCES, RISK AND UNCERTAINTY

Treatment of Resources

1. How can it be assured that both supply and demand side resources are thoroughly and comprehensively addressed? Should a list of resources to cover be provided in the Rule?
    - Legislature has given a list of resources under IC 8-1-37-4
    - Technologies change – some do not develop as fast as expected; some develop faster; or are unknown currently – would need to keep changing the rule unless list regularly updated in a collective meeting before the IRP process.
    - Develop a list prior to each IRP
    - Modeling uses proxies (peaking, intermediate, etc); at plan implementation, choose specific technology for that time
    - Can look at technologies and screen them down in model
    - Can screen technology by commercial status

2. Discuss treatment of resources with particular characteristics. Consider the following questions/issues:
    a. There is the intention to treat all resources on cost basis. How should the rule be written so that demand-side resources must be considered on a "consistent and comparable basis" with utility-owned supply-side resources?
        - Key issues - how do energy efficiency resources costs change over time? How does the amount of and benefits from energy efficiency change over time?
        - Look at avoided costs – model will select cost effective
        - Energy efficiency is a very cost effective resource.
        - Dynamic vs. Static modeling – already need to do 2% - DSM programs looked at, developed and modeled
        - Utility Cost Test – Participant Test – Can the models look at the various tests. Utility Cost Test is the main test that should be used in the model.
        - Look at doing more OR looking at it on a comparable basis.
        - Run without DSM assumption first
        - DSM program has to pass the participation test; then the utility cost test (present value of future revenue requirements), and participant test
        - Do costs tests need further discussion?
        - DSM rules already contain what tests to use; DSM and IRP rules should be consistent
        - *This topic requires further discussion

    b. Same question as a. for customer-owned generation?
        - Is customer-owned generation a subset of DSM?
        - Offsets building new generation
        - Customer-owned generation falls into different categories -- behind the meter generation, vs. net metering, vs. feed-in tariff (premium)
        - Solar and wind more like net metering

- Intermittent resource needs a capacity factor to get on same basis as a supply side resource (e.g. RTO capacity ratings) or economic dispatchable resources (by fuel type and market price)
- Not enough CHP used – may not be economic at this time
- Resource identification for CHP customer: unclear what should be expected of utilities (how can utility plan based on another's plan and to what extent should utilities engage potential candidates?)
- Develop utility relationship with customer
- Customer's financial consideration; but need feedback to know what customer is doing

c. How should energy storage be treated?
   - Different types of energy storage (pumped storage – price differential between peak and off-peak; battery storage – ancillary services – look at market prices and equipment prices and then insert manually)
   - Varies depending on technology, e.g. modeling capabilities adequate for price differential application but not necessarily for ancillary services
   - Mandate of "consistent usage" may be difficult at this time; may not be possible at this time
   - Question of how each resource is characterized; now; at a later time

d. How should efficiency upgrades and lifetime extension projects be considered for applicable existing resources?
   - "lifetime extension projects" – bad term – do not use in rule
   - Plant engineers are also looking at improvements to power plant, continuous small improvements; not every improvement hits the IRP process, but improvement is captured in the heat rate in modeling
   - Attempting to capture all potential improvements would "choke" model

e. What expectations should there be for treating currently pre-commercial technologies that are expected to become commercially viable during the planning horizon?
   - Demand side – technology by industrial customer (could affect load quickly)
   - Supply side – acknowledged, identified, and listed as potential pre-commercial technologies; difficult to measure cost, so can't be incorporated into modeling
   - Both the customer and the utility should communicate regarding emerging technology; make sure there is a mechanism to communicate as technology ramps up
   - Need a stakeholder meeting to become aware of emerging technology (or another communication mechanism), but probably cannot model in IRP due to difficulty in costing; perhaps the state utility forecasting group (SUFG) could be used to identify such technologies.
   - Laws that plan on being enacted end up not being enacted, so use of emerging technology can change
   - If rate of technology change is same in the future as in the past, then load forecast should pick that up, watch for double-counting.
   - Energy efficiency technologies, reduce load, embedded in load forecast

f. Should and/or how to account for extra system costs (e.g. intermittency, interconnection, and line losses)?
   - The intermittency is already accounted for in the models (e.g. Vyntex), more attention could be paid to load shapes
   - Line losses are already incorporated in the models
   - Built into RTO models (e.g. MTEP) and built into utility model as well
   - Capacity factors for intermittent resources may not be what is commonly modeled based on RTO capacity factors
   - Utilities need to plan based on what the RTO models
   - Interconnection costs can be included if contract is in place
   - Some of these costs could be incorporated better, but need to question whether it is worth it

g. What timescale should resource value be assessed for (e.g. hourly scale might capture differences in time of day values of electric services)?
    - If using an hourly dispatch model, it is in there as well.

Do renewable resources need to be addressed?
- Indiana now has voluntary clean energy portfolio standard goals.

Risk and Uncertainty

1. Presentation by IURC: Trends in the treatment of cost uncertainty – see slide #8 to #21 in attached PowerPoint.
2. What risks and uncertainties should be accounted for via risk analysis and scenario planning?
    - Outage in California – how do you plan for that? MACT rules changing – how do you plan for that? Air quality rules – how can the IRP be useful in those situations?
    - Look ahead to what might happen, what's plausible, putting together a plan to cover those scenarios
    - Need to have stakeholder talk and agreement of risks and uncertainties from beginning of IRP
    - 4-5 scenarios is manageable; 8-9 tough; 11-12 very hard
    - At what point is it non-productive?
    - Technology conditions; regulatory environment; economic assumptions – different assumptions for each area – what are the most important things that may be game changers in the future?
    - Risk approach address issues we have more information on, so tends to be more short-term
    - 2009 IRP – carbon price in base case = 100% probability occurring (turned out to be wrong); if probability is closer to reality than 100%, then it is better.
    - Current practices: some prefer stochaistic approach and select the portfolio based on its risk profile

- Cost/benefit to adding scenario planning

3. What minimum standards/methods should be in the Rule?
   - Without being prescriptive and understanding different operations
   - Wide range of scenarios that need to be considered

4. How has risk and uncertainty been treated in previous IRPs? (For example, sensitivity, scenario analysis, probabilistic…)
   - IRP is a result of a business planning process, which includes scenario analysis, risks, probabilities, sensitivities to certain futures, operating characteristics of portfolio.
   - Incorrect premise that current IRPs do not include scenario analysis
   - Current IRPs include looking at probabilities and different scenarios
   - Diversity in the methods used – need dialogue regarding what is being used and why
   - Stochastic methodology – shows volatility and risks in the short term (3-5 years), but not as useful in longer term planning and very computer-intensive

5. How should risk and uncertainty be treated in future IRPs?
   - Set up a plan and then run it against different futures
   - IURC could indicate what it would want in the next IRP (not delineated in the rule)
   - Collaboration and communication – stakeholder process

How to write a rule that ages well? That sets up a process that can include changes?

Important Impacts

1. What 20% of IRP elements have 80% of the results impact?
   - Very utility-specific
   - Don't want to be overly prescriptive.

- Carbon pricing is a good example of a scenario that did not come to fruition.

Incremental Review

1. What is the value of incremental, informal review (by IRP development stage) as opposed to relying only on final formal review? Early review at specific times during IRP development could be beneficial, as discussed previously.

SESSION IV: OTHER REQUIREMENTS, UPDATES, DELIVERABLES, AND FORMAT

Updates, Additions, Deletions, Clarifications; Please provide rationale for all responses below:

1. Requirements that should be changed due to utilities' involvements in RTO's
   - Transmission planning section may not be relevant
   - Look at portions of the rule that deal with transmission – should it be changed? Deleted? How does it coincide with information that utilities give to RTOs? How to harmonize those requirements?
   - Submission of FERC form 715 = in compliance with the transmission part of the rule? Regional planning is evolving and RTO can change that.

2. Definitions to be added, deleted, modified
   - See the comments filed by the utilities in the IURC's investigation
   - If position has changed, let us know
   - Delete the "system lambda" – same concept for everyone; different numbers between MISO and PJM;

3. Planning horizon of 20 years
   - If 20 years not correct, what is a more realistic number and why?

- Long-term analysis is done over 20-30 years – reporting may be 10 year horizon
- 10 years more reasonable, because accuracy diminishes greatly after that. Hard to get commodity price estimates past 10 years.
- Actionable period – short term period
- What's the longest lead time for a plant? Most resources have a 3-6 year construction period, could be over 10 (even 15) for some capital-intensive technologies.
- Demand side – anything beyond 5 years on energy efficiency you can't predict
- 10 years too short – can choose wrong resource if not looking longer term
- Stakeholders might be interested in longer term
- Still running the models out 20+ years, so does not affect amount of resources to do IRP

4. Environmental reporting requirements (e.g. the aggregate and incremental change in emission profiles between the preferred and alternative portfolios and current levels)
   - Any issues?
   - The more we understand about the environmental effect of options, the better off we are.
   - Unit-specific emission statistics outside the scope of IRP (units have to meet requirements anyway to operate) – secondary objective
   - Emissions profile may be of interest to IDEM and citizen groups or public

5. Explanation of differences between the last short term action plan and actual
   - Explanation of differences from the last IRP
   - Update – what's changed and why
   - Dialogue should be part of post-IRP stakeholder process

6. Need to provide spreadsheets and data bases in formats that allow data to be manipulated to run cases based on different combinations of input values
    - OUCC has used and continues to use that kind of data
    - Models are proprietary (from third party); not utility's models to give so that results can be duplicated
    - Options: (1) non-disclosure agreement with vendor – not a confidentiality issue; it's a copyright issue; (2) give specifics on data to be included – use subset of data.
    - Item for further discussion – what subset of data does IURC/OUCC need to analyze IRP
    - Reviewers only need input and to check the reasonableness of the output, don't need to run models themselves

7. Discussion of select contingency portfolios based on key factors that can change quickly
    - Some IRP rules elsewhere require utilities to develop alternative/contingency portfolios that would become the preferred plan if certain conditions changed (usually based on most sensitive and/or likely potential changes from expected case)

8. Rule requirements that need to be clarified
    - Give specifics on what needs to be clarified
    - Redundancy of description of short-term plan vs description of the energy efficiency portfolio
    - "Clear expectations of IURC" – clarify
    - Format of the report – narrative, etc.

9. Other substantive requirements

Deliverables and Format

1. How and to what extent should the IRP be standardized (or what constraints on standardization) for ease of development, review, and understanding, including presentation of results?
    - Standardize to be able to compare; utility's concern about having to tailor company format to state's rules (difficult for multi-state utilities)
    - Ohio forms – tedious and too rigid
    - Basic general data
    - Can you find the information in a similar spot for all the utilities? Would be a good thing for stakeholders
    - Cross-reference table to rule (OUCC says that's helpful)
    - Standardization in presentation of results
    - Shorten and standardize short term action plan, allow it to reference the IRP to avoid redundancy

2. How to make the IRP more concise and to the point?
    - Can't reduce discussion if don't know what IURC wants
    - What's the most important information and what's the least costly to create
    - Provide an executive summary

3. Discuss need for a less technical summary of IRP results, as a useful communication tool (Refer to APS Resource Plan summary)

4. How to make IRPs more available to stakeholders, the public, and interested parties?
        - Should DHS and IDEM be involved in these discussions?
        - Executive Summary on website
        - APS – good structure for IRP

Relationship between SUFG forecast and IRPs – consider

DAY 2 – September 23, 2011

SESSION I: STAKEHOLDER/PUBLIC PARTICIPATION PROCESS

1. Presentation by IURC: Stakeholder Public Participation Process
   -- See slides #22 to 31 in attached PowerPoint.
   -- See also this link to the PNM (New Mexico) IRP site - http://www.pnm.com/regulatory/irp.htm
2. What role should the public and stakeholders have in the IRP process? (For example, advisory, consensus-building, etc.)
   - Advisory – utilities have obligation to serve and IRP is a planning document.
   - Current process (IRP) does not preclude doing this.
   - If you can gain consensus on IRP, it may reduce problems on CPCN. (reduce, not eliminate)

3. What are pros and cons of such a stakeholder process?
   - Agreement on assumptions; educational benefit to both stakeholders and utilities; mitigate negative public perceptions
   - There has been value in other stakeholder processes like DSMCC; the value or net benefits depend on how you set it up (and who's involved)
   - Data gets stale; forecasts get updated regularly; lots of resources involved in stakeholder process (multi-states); confidential information (limit who's involved); new model runs based on stakeholder input
   - If no new resources needed short term, then less controversial but also may not need extensive stakeholder process.
   - Each stakeholder group is advocating for their position – industrial groups, consumers, environmental, power producers, etc.
   - As long as each group thinks it's being heard, then they feel it's fair.
   - Already can do this process under current IRP rules (it's optional); interested persons can request to receive copies of IRP rules. Utilities see some value and may voluntarily introduce this process if it expects significant resource activity to soon follow.

- Time intensive; will add work, not eliminate it
- Can you back off the process once you start it?
- Does involvement affect whether and how input is given later?
- Resolve access issue by increasing ease of access on IURC website
- Some additional transparency – understand what all parties need
- IRP is only useful if have stakeholder input – some utilities are getting that now through involvement with Industrials
- Success depends upon how you set up the process
- Is this process needed if no plans to build?
- Some believe working now as the rule is currently written
- Naïve to assume that this process will eliminate litigation and dissension – level of conflict goes up if building base load and whether doing energy efficiency
- Level of dissent has been narrowed by using the stakeholder process in other states

4. What challenges does such a process bring?
    - Costs
    - Logistics
    - Changing input assumptions

5. Who should administer the process?
    - Utility
    - Third party
    - (New Mexico – utility run, but third party administrator)

6. How would a utility set up such a process?
    - Utility facilitates stakeholder meeting with information sent out ahead; educational portion; groups and moderator; stakeholders provide input; stakeholders produced report to utility

- Benefit – takes away mystery in process and stakeholders gained understanding of utility and utility received input
- Pre-IRP stakeholder meeting to provide input; IRP; post-IRP stakeholder meeting to explain results
- Stakeholder meeting to inform
- Stakeholders break into groups and breakdown issues, then submit report to utility. Learning experience for stakeholders. At the end of the IRP process, have a meeting with stakeholders and show them how their input was used in IRP.
- Could be another item on an agenda of an existing collaborative group (such as DSM collaborative)

7. Should meetings be open to the public at large or limited to a stakeholder team?
   - Limited to stakeholders, intervenors, public officials
   - Need to limit participation due to confidentiality concerns.
   - No media
   - If not open to public, this is a closed process and causes suspicion.
   - Better if those attending have enough basic knowledge, otherwise more time and resources will need to be used.
   - [Note from IURC staff – this Technical Conference is an open public meeting that was publicly noticed; however no public participation occurred]

8. Should any IRP-conducting entities be exempted from such a process?

- No, every utility should be required to follow process.
- Co-ops – because of how entity is set up – 12 stakeholder meetings a year – already have stakeholder process and input in place

Additional Comments

- Time commitment of stakeholder process will be costly
- Stakeholder enlightenment can lead to second guessing of the value of the process if significant changes occur after the IRP is issued
- Stakeholder process could result in finger pointing in docketed cases – "you had your chance to speak up and you didn't"
- Don't necessarily need open stakeholder process, but rather should try to improve/tweak current process. Perhaps submitting comments via websites.
- Maybe valuable, but we need to know more about what is being done with the documents/information shared and who would be using it.
- IRP is not a very useful document if you DON'T get input from industrials – Some utilities already do this, so what is currently broken?
- May not narrow dissension, but may add to it because of the education. The process allows for public input during ratemaking process. Already is a collaborative process.
- From experience with past stakeholder processes, at end of day, some feel it is not valuable to formalize stakeholder process.
- The goal is to arrive at better assumptions.
- How do we determine which stakeholders should be involved?
- Generic stakeholder process can result in huge time commitments
- Not the best use of time for utilities. It is a technical process and "public" will not understand.
- Most already have a collaborative DSM process. Could take one of these meetings and address IRP perhaps.
- Is there any value if you don't plan on building anything?
- Do we need a rule that says you "must" do this. Current process seems to be working and there is already incentive for utilities to get input.
- It is naïve to think that the level of dissension would be reduced by this process.
- Always going to be pressure on energy efficiency side.

SESSION II: PROCEDURAL ISSUES

1. How can data requests be expedited?
    - [Please comment on in written comments.]

2. Suggestions on process for requesting waiver early in IRP development
    - [Please comment on in written comments]

3. Suggestions to update and streamline filing process
    - [Please comment on in written comments]

4. Suggestions on filing and review schedule, e.g., Is there a better filing date? What is a reasonable review timeframe, assuming stakeholders will be involved in IRP development?
    - November 1st - currently
    - December 1st proposed but spring load forecasts start to become dated and doesn't work well for some utilities, who prefer it to be sooner
    - OUCC states that 3 months over the holidays is a constraint – better for OUCC to have filing date in January, or lengthen the time for comments.
    - Different utilities file on different schedules – staggered – but makes comparison and regional analysis more difficult.
    - Stakeholder process – may not save time on review.
    - End of the year tends to be the time when employees are trying to use vacation time

5. What are the pros and cons of a filing frequency different from every 2 years? How could an annual update of evolving issues and results relate to filing frequency?
    - More time in between is better for utility, but if 3 year (or longer) filing, then could see 18 month (narrative) update, but depends on what's happening (new building, etc.)

- If have more involved stakeholder process, then longer filing frequency (3 years or more) would be better
- If 3 year, don't same years as Kentucky (2011-Duke; 2012-AEP) ; [North Carolina 2 year IRP with extensive annual update]
- Need to consider other states' schedules.
- [Please include scheduling issues in written comments.]

SESSION III: CONTEMPORARY ISSUES AND ANNUAL UPDATE CONCEPTS

1. Presentation by IURC: Contemporary Issues and Annual Update Proposal – see slides #32 to 37 in attached PowerPoint.
2. What are the pros and cons of instituting the concept of Contemporary Issues agenda/meeting?
   - Current summer preparedness could be contextualized with the IRP process. Present actionable issues rather than what keeps the CEO up at night (e.g, Japan and nuclear). Can spur good ideological discussion and examine issues which could change assumptions in IRP. Short-term action plans should not be viewed in a vacuum. It is an interim plan between IRPs.
   - Explanation of what changes an assumption that's in an IRP
   - No problem with being presented with special issues/topics to comment on, but give enough time (early in IRP process) for utility to reply in IRP
   - Can become confusing. If you have an annual update, do you need a summer preparedness report? Environmental issues, DSM program, other reporting. Not a lot of value, given other required reporting.
   - Best done in spring if IRP due in November
   - Commission would need to send out topics in a timely manner
   - Example is Ohio, which issues list of special topics (draft Missouri IRP rule also has contemporary issues)

3. What are the pros and cons of instituting an annual update?
    - Do not use “revision of Short-term action” which could require a formal IRP revision
    - Materiality level that would trigger reporting
    - Concept vs numbers; would just a narrative be required or models expected to be re-run?
    - Tag on to another meeting, so not spending a whole lot of time on something with limited value
    - IRP is a “living document” but preparing for public consumption is a lot more work
    - With being on a 2 year IRP cycle, annual update doesn’t make sense
    - Any major changes would probably fall out to another IURC proceeding (CPCN, etc)
    - If on 3 year IRP cycle, forum on what changed for IRP
    - The value of the process is contingent upon the amount conditions change
    - Could limit focus to changes in short term action plan, not entire IRP planning horizon

4. How can these concepts be harmonized with the annual Summer Preparedness presentations?
    - Connect with IRP process
    - If have an annual update, do you need Summer Preparedness?
    - How does being in RTO effect Summer Preparedness?
    - Overlap with July compliance update in DSM order
    - Beneficial to do with Summer Preparedness if going to be major changes from IRP; oral presentation only
    - Will be difficult to harmonize timing (Nov IRP filing will be getting old come spring when summer preparedness comes into play)
    - Don’t have all the information (e.g. contracts incomplete) or modeling done by time of Summer Preparedness if time moved up

- Summary of changes
- Value in Tech Conf set up

Other Comments:

- Spring would not be a good time to submit an IRP for some utilities due to other organizational requirements.
- March 1st date to submit load and resource info to MISO for it to prepare for its summer assessment.

WRAP-UP

1. What other issues have not yet been addressed?
   - How can we make better use of SUFG?
   - "Fragmented planning results in overbuilding" – is there any way for utilities to cooperate with each other and collaborate in developing their plans, considering expected future regional resource conditions?

2. Possible action on issues in "parking lot" See above

3. Feedback on making 2011 IRPs more available
   - Executive summary for public consumption; not necessarily a separate document
   - IURC post all of the executive summaries of the IRPs
   - Executive summary of 2011 IRP that is more appropriate for non-technical audiences okay for some utilities, but may be a strain on others

4. Next steps: remaining process and schedule

- IURC will circulate and post Tech Conf summary - Actual
- Oct 21st – Written comments on questions and in preparation of strawman draft proposed rule
- Nov 18th – IURC will circulate and post strawman
- Jan 3rd – Written comment on strawman
- January 2012 – date TBD – Workshop on strawman
- Goal is to have rulemaking process complete by Fall 2012.