



2501 South Cooperative Way
P.O. Box 908
Bloomington, IN 47402-0908
Office 812-876-2021
Fax 812-876-3476
HEPN.com

March 31, 2016

Beth Krogel Roads
General Counsel
Indiana Utility Regulatory Commission
101 W. Washington St., Suite 1500 East
Indianapolis, IN 46204

Dear Ms. Roads:

Hoosier Energy has reviewed 170 IAC 4-7 and 4-8, Second Strawman Draft Proposed Rule, dated March 2, 2016 ("Second Draft Proposed Rule"). Hoosier Energy has one suggested edit to the Second Draft Proposed Rule:

In the Second Draft Proposed Rule, 170 IAC 4-8-1 (mm) defines "Utility" as

- (1) A public, municipally owned, or cooperatively owned electric utility; or**
 - (2) A joint agency created under IC 8-1-2.2;**
- Unless the utility is exempt under IC 8-1-8.5-7.**

IC 8-1-8.5-10 specifically exempts municipally owned and cooperatively owned electric utilities from the energy efficiency plan filing requirements. Therefore, Hoosier Energy believes that the reference to IC 8-1-8.5-7 should be replaced by a reference to IC 8-1-8.5-10 in the proposed language in 170 IAC 4-8-1 (mm).

Estimated Financial Impact of Proposed Changes:

Hoosier Energy estimates that the impact of the proposed changes to the Integrated Resource Plan rule will be as follows:

- Hoosier Energy anticipates that the analytical requirements outlined throughout 170 IAC 4-7 will require additional modeling and assessment.
- Hoosier Energy estimates that it will require substantial input from its Power Markets staff to meet the Resource Adequacy Annual Update requirements mandated in 170 IAC 4-7-2.2.

The estimated annual financial impact of these changes will be \$25,000 - \$50,000. Thank you for the opportunity to provide comments regarding the Second Strawman Draft Proposed Rule.

Sincerely,

HOOSIER ENERGY RURAL ELECTRIC COOPERATIVE, INC.

A handwritten signature in black ink, appearing to read "Rich Gillingham". The signature is written in a cursive style with a large initial "R" and a stylized "G".

Richard Gillingham
Senior Analyst, Resource Planning
(812) 876-0268
rgillingham@hepn.com