

Received On: May 29, 2014
IURC 30-Day Filing No.: 3249
Indiana Utility Regulatory Commission

Indiana Michigan Power
P.O. Box 60
Fort Wayne, IN 46801
IndianaMichiganPower.com



A unit of American Electric Power

Secretary of the Commission
Indiana Utility Regulatory Commission
PNC Center
101 West Washington Street, Suite 1500 East
Indianapolis, Indiana 46204

May 29, 2014

Dear Secretary:

Pursuant to 170 IAC 1-6, I&M submits this thirty-day filing requesting amendments to I&M's Rider D.R.S.1 (Demand Response Service - Emergency). In support of this thirty-day filing, I&M represents that on April 27, 2011 in Cause No. 43566 PJM1, the Commission approved I&M's Rider D.R.S.1. Included in the approval of Rider D.R.S.1, was Rider language stating, "The Company reserves the right to make changes to this Rider in order to continue to qualify under the PJM Emergency Demand Response Program, or otherwise, as appropriate." Additionally, I&M represents that on May 9, 2014, the Federal Energy Regulatory Commission (FERC) approved in Docket ER14-822, modifications proposed by PJM Interconnection LLC to its Open Access Transmission Tariff (OATT), some provisions of which go into effect June 1, 2014. I&M requests to amend Rider D.R.S.1 to reflect the new provision of OATT that becomes effective June 1, 2014 pertaining to Pre-Emergency curtailments.

Approved in Docket ER14-822 is a Pre-Emergency curtailment option that provides PJM with additional flexibility while the limit of total curtailment requests per year, Emergency and Pre-Emergency, has not increased. The PJM information regarding the new Pre-Emergency curtailment is included in Attachment A.

As indicated above, included in FERC's approval in Docket ER14-822, are provisions that are not effective June 1, 2014. Specifically, a provision that reduces the notification period to thirty (30) minutes unless the demand response customer has requested and has been approved for an exception that provides a longer notification period. This provision will become effective June 1, 2015. I&M is not addressing this provision in this thirty-day filing. The PJM procedure for customers to apply for the exception is not fully developed at this time. Once the procedure to apply for the exception is developed, I&M will communicate this information to all Rider D.R.S.1 customers. This additional time should allow time for those customers desiring an exception the opportunity to apply for such exception before the effective date of June 1, 2015. I&M will address this new provision in a later filing prior to the effective date.

The proposed modification to Rider D.R.S.1 will allow I&M's customers receiving service under Rider D.R.S.1 to continue to qualify under the PJM Emergency Demand Response Program.

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In support of this 30-Day filing, I&M is submitting the following information:

1. Indiana Michigan Power Company's Rider D.R.S.1 (Demand Response Service - Emergency), Tariff Sheets THIRD REVISED SHEET NO. 29.
2. Supporting PJM documentation, Attachment A, and
3. Verified Statement of Publication.

Upon completion of your review, please return to us one set of the stamped approved tariff sheets.

If you have any questions regarding I&M's filing please contact me at (260) 408-3503 or wwhix@aep.com.

Sincerely,



William W. Hix
Principal Regulatory Consultant

Enclosures

cc: Andrew Williamson-I&M
Brad Borum-IURC
David Stippler-OUCC

**RIDER D.R.S.1
(Demand Response Service – Emergency)**

Availability of Service.

Available for demand response service (DRS) to customers taking firm service from the Company under Tariffs G.S., G.S.-TOD, L.G.S., L.G.S.-TOD, I.P., M.S., W.S.S., or E.H.G. who have the ability to curtail load under the provisions under this Rider. Each customer electing service under this Rider shall contract for a definite amount of DRS capacity, not to exceed the customer’s normal demand capable of being curtailed.

The Company reserves the right to limit the aggregate amount of DRS capacity contracted for under this Rider and Tariff C.S.-IRP2 to 235 MVA. The Company will take DRS requests in the order received. The customer’s DRS capacity under this Rider will be enrolled in the PJM Interconnection, L.L.C. RTO (PJM) Emergency Demand Response Program through the Company. The Company further reserves the right to limit registrations should PJM restrict the Company from registering customers in any PJM product type. The customer’s DRS capacity is not eligible for enrollment in any PJM demand response program either directly or through a Curtailment Service Provider (CSP). Customer’s participating in this Rider may elect to use the services of a CSP provided that such arrangements do not violate the terms and conditions of this Rider.

A CSP is an entity such as a PJM-qualified CSP that the customer has designated to facilitate all or some of the customer notifications and transactions under this Rider.

The customer must provide written notice to the Company of any such designation. Such written notice shall specify the authority that the customer has granted to the CSP, including any authority to access customer data. The customer is ultimately responsible for compliance with the terms and conditions of this Rider, including any charges under this Rider, in which the customer has voluntarily elected to participate.

The term “customer” as used herein shall mean the customer or an aggregation of customers that have agreed for purposes of participation in the Rider to participate as an aggregation in the same manner as a single customer would under this Rider. The term “participant” as used herein shall mean the customer or customer-designated CSP as defined above.

Conditions of Service.

- (1) The provisions of this Rider qualify under the PJM Emergency Demand Response Program as of the effective date. The Company reserves the right to make changes to this Rider in order to continue to qualify under the PJM Emergency Demand Response Program, or otherwise, as appropriate.
- (2) The Company reserves the right to call for (request) customers to curtail their DRS load when a Pre-Emergency and/or Emergency Mandatory Load Management Reduction Action has been issued by PJM.
- (3) The Company will endeavor to provide as much advance notice as possible of curtailments under this Rider including an estimate of the duration of such curtailments. However, the customer’s DRS load shall be curtailed within 90 minutes if so requested.
- (4) All curtailments will apply for the delivery year (DY) which is defined by PJM as June 1 through May 31 of the following year. Contracts will apply for multiple delivery years.

N
N

(Cont’d on Sheet No. 29.1)

**ISSUED BY
PAUL CHODAK III
PRESIDENT
FORT WAYNE, INDIANA**

**EFFECTIVE FOR ELECTRIC SERVICE RENDERED
ON AND AFTER , 2014**

**ISSUED UNDER AUTHORITY OF THE
INDIANA UTILITY REGULATORY COMMISSION
CONFERENCE DATED
30-DAY FILING NO.**

**RIDER D.R.S.1
(Demand Response Service – Emergency)**

Availability of Service.

Available for demand response service (DRS) to customers taking firm service from the Company under Tariffs G.S., G.S.-TOD, L.G.S., L.G.S.-TOD, I.P., M.S., W.S.S., or E.H.G. who have the ability to curtail load under the provisions under this Rider. Each customer electing service under this Rider shall contract for a definite amount of DRS capacity, not to exceed the customer’s normal demand capable of being curtailed.

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- (3) The Company will endeavor to provide as much advance notice as possible of curtailments under this Rider including an estimate of the duration of such curtailments. However, the customer’s DRS load shall be curtailed within 90 minutes if so requested.
- (4) All curtailments will apply for the delivery year (DY) which is defined by PJM as June 1 through May 31 of the following year. Contracts will apply for multiple delivery years.

N
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(Cont’d on Sheet No. 29.1)

**ISSUED BY
PAUL CHODAK III
PRESIDENT
FORT WAYNE, INDIANA**

**EFFECTIVE FOR ELECTRIC SERVICE RENDERED
ON AND AFTER , 2014**

**ISSUED UNDER AUTHORITY OF THE
INDIANA UTILITY REGULATORY COMMISSION
CONFERENCE DATED
30-DAY FILING NO.**

Summary of Proposed Changes (2014-2015 DY)

- **Registration**
 - All registrations classified as Pre-Emergency or Emergency
 - Emergency = On-Site generation that may only operate under PJM emergency conditions
 - New 30 minute lead time (short), rename 60 minute lead time to (medium) and 120 lead time (long)
 - Emergency energy offer price cap by lead time:
 - 30 minutes, Price \leq \$1,000 MWh plus Primary Reserve factor minus \$1
 - 60 minutes, Price \leq \$1,000 MWh plus (Primary Reserve factor/2)
 - 120 minutes, Price \leq \$1,100 MWh
- **Event**
 - Pre-Emergency vs Emergency (both Pre-Emergency and Emergency DR must respond to event)
 - Min event duration reduced from 2 hours to 1 hour
- **M&V**
 - PJM will measure compliance for partial dispatch clock hours based on prorated commitment based on number of minutes dispatched in hour where PJM dispatched for at least 30 minute of clock hour.
 - Ability to use 1 minute meter data instead of prorate process
- **Penalties**
 - No changes
- **CSP Load Reduction Reporting (used for PJM dispatch and price formation)**
 - CSP provide aggregation expected real time load reductions by:
 - Zone (same as today), Lead time (new 30 minute classification), Event type (Emergency vs Pre-Emergency)

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

VERIFIED STATEMENT OF PUBLICATION

William W. Hix, being duly sworn upon oath, deposes and says that:

1. I am a Principal Regulatory Consultant for Indiana Michigan Power Company (I&M).
2. Pursuant to 170 IAC 1-6-5(a), I affirm that affected customers have been notified of I&M's thirty-day filing of an updated Rider D.R.S.1 (Demand Response Service-Emergency) to reflect the addition of a Pre-emergency curtailment option to PJM Interconnection LLC's Open Access Transmission Tariff (OATT) approved by FERC in Docket ER14-822 which goes into effect June 1, 2014.
3. Notification of the thirty-day filing updating Rider D.R.S.1 (Demand Response Service-Emergency) was made by publication of a Legal Notice in a newspaper of general circulation that has a circulation encompassing the highest number of I&M's customers, and posting the notice on I&M's website.
4. A true and correct copy of I&M's Legal Notice is attached hereto as Exhibit "A".

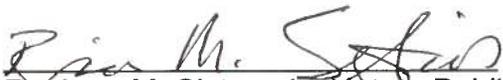
Date: May 28, 2014



William W. Hix
Principal Regulatory Consultant
Indiana Michigan Power Company

STATE OF INDIANA)
) ss:
COUNTY OF ALLEN)

Subscribed and sworn to before me, a Notary Public, in and for said County and State this 28 day of May 2014.



Regina M. Sistevaris, Notary Public

I am a resident of Allen County, Indiana.
My commission expires: March 6, 2015

Received On: May 29, 2014
IURC 30-Day Filing No.: 3249
Indiana Utility Regulatory Commission



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Keyword: on or before May 27

Category: Any

Type: Any

From: Today

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Public Notice- Legal Individual - 9906

LEGAL NOTICE
STATE OF INDIANA
INDIANA UTILITY REGULATORY
COMMISSION

Indiana Michigan Power Company (I&M), an Indiana corporation, gives notice that on or before May 27, 2014, it will submit for approval under the Indiana Utility Regulatory Commission's thirty-day filing process, an updated Rider D R S 1 (Demand Response Service-Emergency) to reflect the changes to the PJM Interconnection LLC (PJM) Open Access Transmission Tariff (OATT) approved by FERC on May 9, 2014 in Docket ER14-822 that will go into effect June 1, 2014. The operational change that affects the demand response rider customers during the PJM year 2014/2015 pertains to PJM's ability to issue, in addition to Emergency curtailment requests, Pre-emergency curtailment requests. The addition of the Pre-emergency curtailment provides PJM with additional flexibility while the limit of curtailment requests per year, Emergency and Pre-emergency, has not increased. I&M will submit proposed language that adds the Pre-emergency curtailment as a possible curtailment option. While Rider D R S 1 customers may be affected by the addition of the Pre-emergency curtailment requests, the maximum number and maximum duration of curtailment events has not changed. A decision on the proposed revisions to Rider D R S 1 is expected from the Indiana Utility Regulatory Commission on or before June 25, 2014. Please direct inquiries to:

Indiana Michigan Power Company
Attn: Director of Regulatory Services
P.O. Box 60
Fort Wayne, IN 46801
Objections to this filing can be made to the following:
Indiana Utility Regulatory Commission
Attn: Commission Secretary
PNC Center
101 West Washington Street
Suite 1500 East
Indianapolis, Indiana 46204
Indiana Office of Utility Consumer Counselor
PNC Center
115 W. Washington Street
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Indianapolis, Indiana 46204
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AEP	52.70	+1.29
Comcast	52.06	+0.09
GE	26.57	+0.06
ITT Exelis	17.00	+0.26
LNC	48.84	+0.55
Navistar	35.00	+1.57
Raytheon	96.82	-0.21
SDI	17.87	+0.10
Verizon	49.62	-0.12

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