

Received: January 30, 2015

Indiana Utility Regulatory Commission



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Dr. Brad Borum
Director, Electricity Division
Indiana Utility Regulatory Commission
101 W. Washington Street
Indianapolis, IN 46204

Re: Comments on Northern Indiana Public Service Company's 2014 Integrated Resource Plan related to the Stakeholder Process

Dear Dr. Borum:

Please accept the following comments related to the process undertaken by NIPSCO in relation to its Integrated Resource Plan for 2014. Comments on the technical aspects of the plan will be submitted separately. The Sierra Club Hoosier Chapter has been involved in many IRP's over the last two years. The process used by NIPSCO by far was one of the most open and participatory of the ones we have been involved in and we believe should provide a model for others moving forward in the second round of plans this year. The following five points illustrate why the process deployed by NIPSCO was exceptional:

- 1) NIPSCO offered multiple meetings with individual stakeholders to discuss various drafts of the plan, answered questions about the modeling and assumptions underlying the model and followed up promptly with responses throughout the year;
- 2) All meetings were held in the NIPSCO service territory which allowed customers and stakeholders in the area to attend;
- 3) NIPSCO held more than the minimum two public sessions by adding a third public meeting in response to requests for more review when it became apparent that stakeholders were not satisfied with the two meetings as required by the rule;
- 4) In addition to the three general public meetings and numerous individual stakeholder meetings, NIPSCO agreed to run models of various scenarios and sensitivities as requested by the Sierra Club to further analyze higher carbon costs, earlier retirement of existing generation facilities and accompanying net revenue requirements of scenarios beyond the minimum number they had initially set up;
- 5) Upon our request, on several occasions, NIPSCO made key personnel available who were doing the modeling and who provided detailed answers to our questions regarding the model itself which went above and beyond requirements.

By going beyond the minimum requirements of the new rule, NIPSCO invested substantial resources into the modeling and the process which led to a much better understanding of the IRP

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process itself and the results. Although we may not agree on all the conclusions as evidenced in technical comments being submitted separately, the process NIPSCO used, the company's willingness to answer every question and to provide more meetings than required was exemplary. We believe these best practices should become the basis for improving the process in subsequent years. I would be happy to answer any questions you may have regarding these comments, especially as you work to improve the process and implement best practices that could be adopted by the Commission as it develops the IRP process in future iterations.

Sincerely,

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