

**STATE OF INDIANA**  
**INDIANA UTILITY REGULATORY COMMISSION**  
**IN THE RULE DEVELOPMENT PHASE OF RM 18-02**

---

**SUBMISSION OF INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S  
RESPONSES TO FINANCIAL IMPACT QUESTIONS CONCERNING RM 18-02**

---

**IURC: Please answer the following questions regarding business type:**

1. Are you a state or local government? If so, please respond to the questions below considering increases in revenues, expenditures, appropriations, and distributions.

**OUCG Answer:**

Yes. The Indiana Office of the Utility Consumer Counselor's ("OUCC") authorizing statute is Ind. Code ch. 8-1-1.1.

2. Are you a small business, defined by IC 4-22-2.1-4 as a business where on at least 50% of your working days occurring during the preceding calendar year, your business employed not more than 150 employees and the majority of your employees work in Indiana?

**OUCG Answer:**

Not Applicable

3. How many customers/constituents/businesses/etc. do you have in Indiana?

**OUCG Answer:**

Although the exact number is not currently known, the OUCC is the statutory representative of Indiana utility consumers. The OUCC primarily represents customers of electric, gas, water and wastewater utilities subject to full regulation by the Indiana Utility Regulatory Commission ("IURC") or to those subject to a lesser degree of regulation under Indiana's alternative regulatory laws. The OUCC also protects the public interest in such proceedings.

**IURC: In assessing the financial impact, we request information on the following:**

1. What direct savings do you see as a result of the new procedural rule? This could include but is not limited to savings in printing, mailing, courier service, and overtime costs.

**OUCG Answer:**

The OUCC has used electronic service of documents extensively for many years, so there weren't significant new savings from reduced expenses for copying, mailing or courier services. The OUCC is based in a different tower of the same office building in which the IURC is located, so it does not take significant personnel hours to hand-deliver

documents for filing with the IURC. However, the OUCC administrative staff has certainly benefitted from added convenience, reduced stress and some timing savings from the IURC's launching of its electronic filing system.

2. What direct savings do you see as a result of the new ex parte rule? This could include but is not limited to research costs and costs for professional services like legal and accounting.

**OUCC Answer:**

No opinion at this time.

3. What indirect savings do you see as a result of the rule? This could include but is not limited to changes and additions regarding settlement, mediation, and confidentiality.

**OUCC Answer:**

No opinion at this time.

4. What direct costs do you see as a result of the new rule?

**OUCC Answer:**

No opinion at this time.

5. Are there any changes to the rule you suggest specifically as a cost-saving measure?

**OUCC Answer:**

Not at this time.

6. Are there any other changes you would suggest being made to the rule?

**Answer:**

Not at this time.

Respectfully submitted,

*/s/ Karol H. Krohn*

---

Karol H. Krohn (Atty. No. 5566-82)  
Deputy Consumer Counselor  
Direct Phone: 317-233-3235  
[kkrohn@oucc.in.gov](mailto:kkrohn@oucc.in.gov)

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR  
115 West Washington Street, Suite 1500 South  
Indianapolis, IN 46204  
317-232-2494 - Telephone  
317-232-5923 – Facsimile  
[infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)

**Note:**

*Since all comments will be promptly and publicly posted on the IURC's web page, parties to this IURC rulemaking proceeding are not required to make same-day service of comments under a certificate of service.*