**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

**IN THE RULE DEVELOPMENT PHASE OF RM 15-06**

**Submission of INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR’S August 8, 2016 RECOMMENDED CHANGES TO THE INDIANA UTILITY REGULATORY COMMISSION’S july 5, 2016 DRAFT PROPOSED RULE IN THE RULE DEVELOPMENT PHASE OF RM 15-06, AMENDING 170 iac 4-7 ON integrated resource planS and 170 IAC 4-8 ON ENERGY EFFICIENCY AND Demand RESPONSE programs**

The Indiana Office of Utility Consumer Counselor (“OUCC”) submits the attached red-lined comments suggesting further changes to the Indiana Utility Regulatory Commission’s (“Commission’s”) July 5, 2016 draft proposed rule to amend the Commission’s integrated resource plan (“IRP”) rule in 170 IAC 4-7 and its energy efficiency (“EE”) and demand response (“DR”) rule in 170 IAC 4-8.

Readers should note that all yellow highlighting in the document marks the Commission’s red-lined changes to the last strawman draft proposed rule. The OUCC’s proposed changes appear in a blue font with comment blocks in the right margin explaining the reasoning behind each proposed change. At several points, the text is highlighted in yellow, but appears in the OUCC’s blue font. Please refer to the Commission’s July 5, 2016 draft proposed rule for any needed clarification.

The OUCC appreciates the Commission’s investment of significant time and effort and its thoughtful consideration of these and prior comments filed in the rule development phase of this proceeding. The OUCC understands that, since the Commission will promptly post all comments received on its public web page for RM 15-06, parties are not required to serve their comments on other interested parties.

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

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

115 West Washington Street, Suite 1500 South

Indianapolis, IN 46204

infomgt@oucc.in.gov

317-232-2494 - Telephone

317-232-5923 – Facsimile