

Wabash Valley Power

energy smart

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August 31, 2015

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

Dear Ms. Roads:

On July 30, 2015, several members of Wabash Valley Power (WVPA) staff attended the initial Rule Development Workshop of the Indiana Utility Regulatory Commission ("Commission" or "IURC") regarding the Integrated Resource Plan ("IRP") – Energy Efficiency Plan Rulemaking (IURC RM #15-06). We appreciate the opportunity to make written comments at this time.

As stated during the workshop, the current IRP Draft Proposed Rule dated 10/04/2012 was developed through a joint process between the IURC, 8 Indiana electric utilities and numerous stakeholders through IURC RM #11-07. The intent in late 2012 was for this Draft Proposed Rule to be adopted and effective by the November 2013 IRP deadline. This was so clear that the 8 Indiana electric utilities required to file an IRP committed to a good faith effort to comply with the Draft Proposed Rule despite the rulemaking moratorium issued in January 2013. Given this history, WVPA believes that modifications to the current IRP Draft Proposed Rule should be limited to updates concerning the inclusion and/or description of energy efficiency (EE) and demand response (DR) within the Resource Assessment, Selection of Future Resources and Resource Integration sections. The passage of Senate Enrolled Act 412 during the 2015 legislative session does not authorize nor warrant a complete revamping of the existing Draft Proposed Rule.

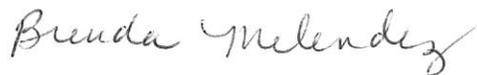
Pursuant to IC 8-1-8.5-10, WVPA as an electric cooperative formed under the Indiana Nonprofit Corporations Act is not considered an electricity supplier for purposes of IC 8-1-8.5 which was added to the Indiana Code as a new section by Senate Enrolled Act 412. Therefore, WVPA is not required to petition the commission for approval of an energy efficiency plan once every three years as mandated by this new section. However, WVPA has and will continue to offer EE and DR programs to our members' customers. Within the context of the IRP, WVPA is committed to providing the IURC with a description of our programs and an analysis of our achieved savings. Additionally, WVPA is working towards treating EE and DR in a manner comparable to traditional generating resources in our IRP. However, we believe this to be an iterative task which may take a few attempts to arrive at a method that provides the level of evaluation desired by the Commission.

Additionally, as an electric cooperative, WVPA is currently exempt from the public advisory process described in 170 IAC 4-7-2.1 of the Draft Proposed Rule. As discussed above, a rulemaking initiated out of Senate Enrolled Act 412 should not create an opportunity to alter that exemption. There is a sound basis as to why WVPA is exempted from the public advisory process. Under our cooperative business structure, WVPA's members are represented by their respective Board Director and CEO at monthly board meetings where each Director votes on power supply decisions that directly impact WVPA's future resource planning. These power supply decisions include the level and type of energy efficiency and demand response programs offered to our members, which our cooperative members can ultimately offer to their respective members. Because our members, who are our customers, have a direct voice in decisions, we do not feel that requiring a cooperatively owned entity to participate in a public advisory process is necessary.

WVPA plans to participate in future workshops regarding the Integrated Resource Plan – Energy Efficiency Plan Rulemaking. We look forward to making additional comments on the next strawman draft.

Sincerely,

WABASH VALLEY POWER ASSOCIATION, INC.



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