

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANA MICHIGAN)
POWER COMPANY (I&M) FOR APPROVAL OF)
RENEWABLE ENERGY PURCHASE)
AGREEMENTS WITH THE HOOSIER LINE) CAUSE NO. 46088
SOLAR PROJECT AND THE MEADOW LAKE IV)
WIND PROJECT (CLEAN ENERGY PPA)
PROJECTS) AS CLEAN ENERGY PROJECTS)
AND ASSOCIATED ACCOUNTING AND)
RATEMAKING, INCLUDING TIMELY COST)
RECOVERY, UNDER IND. CODE § 8-1-8.8-11.)

VERIFIED PETITION

Indiana Michigan Power (I&M, Company, or Petitioner) respectfully petitions the Indiana Utility Regulatory Commission (Commission) for approval of renewable energy purchase agreements with the Hoosier Line Solar Project and the Meadow Lake IV Wind Project, and associated accounting and ratemaking, including timely cost recovery, under Ind. Code § 8-1-8.8-11. In accordance with 170 IAC 1-1.1-8 and 1-1.1-9 of the Commission’s Rules of Practice and Procedure, I&M submits the following information in support of this Petition.

I&M’s Corporate Status

1. I&M, a wholly-owned subsidiary of American Electric Power Company, Inc. (AEP), is a corporation organized and existing under the laws of the State of Indiana, with its principal offices at Indiana Michigan Power Center, Fort Wayne, Indiana. I&M is engaged in, among other things, rendering electric service in the States of Indiana and Michigan. I&M owns and operates generation, transmission, and distribution plant and equipment within the States of Indiana and Michigan that are in service and used and

useful in the furnishing of such electric service to the public. I&M has maintained and continues to maintain its properties in a reliable state of operating condition.

2. I&M supplies electric service to approximately 482,000 retail customers in northern and east-central Indiana and 133,000 retail customers in southwestern Michigan. I&M's Indiana service area covers approximately 3,200 square miles. In Indiana, I&M provides retail electric service to customers in the following Indiana counties: Adams, Allen, Blackford, DeKalb, Delaware, Elkhart, Grant, Hamilton, Henry, Howard, Huntington, Jay, LaPorte, Madison, Marshall, Miami, Noble, Randolph, St. Joseph, Steuben, Tipton, Wabash, Wells and Whitley. In addition, I&M serves wholesale customers in Indiana and Michigan.

I&M's "Public Utility" Status

3. I&M is a "public utility" under Ind. Code § 8-1-2-1. I&M is also an "eligible business" as that term is defined in Ind. Code § 8-1-8.8-6. I&M is subject to the jurisdiction of this Commission in the manner and to the extent provided by the Public Service Commission Act, as amended, and other pertinent laws of the State of Indiana.

4. I&M is also subject to the jurisdiction of the Michigan Public Service Commission and the Federal Energy Regulatory Commission (FERC) as to electric service provided by I&M to retail customers in Michigan and to wholesale customers, respectively.

5. I&M's transmission system is under the functional control of PJM Interconnection, L.L.C., a FERC-approved regional transmission organization (RTO), and is used for the provision of open access non-discriminatory transmission service pursuant

to PJM's Open Access Transmission Tariff on file with the FERC. As a member of PJM, charges and credits are billed to AEP and allocated to I&M for functional operation of the transmission system, management of the PJM markets including the assurance of a reliable system, and general administration of the RTO. I&M must also adhere to the federal reliability standards developed and enforced by the North American Electric Reliability Corporation (NERC), which is the electric reliability organization certified by the FERC to establish and enforce reliability standards for the bulk power system. ReliabilityFirst (RF) is one of eight NERC Regional Entities and is responsible for overseeing regional reliability standard development and enforcing compliance. I&M's transmission facilities are wholly located within the RF region.

I&M's Electric Utility System

6. I&M renders electric service by means of electric production, transmission and distribution plant, as well as general property, equipment, and related facilities, including office buildings, service buildings and other property, all of which is used and useful in the generation, purchase, transmission, distribution and furnishing of electric energy for the convenience of the public. To continue to properly serve the public located in its service area and to discharge its duties as a public utility, I&M has and continues to make numerous additions, replacements, and improvements to its electric utility systems.

7. I&M's property is classified in accordance with the Uniform System of Accounts (USOA) as prescribed by the FERC and adopted by this Commission.

Clean Energy PPA Projects

8. The Hoosier Line Solar Project (Hoosier Line Project) will be located in

White County, Indiana and will produce 180 MWs of solar generation. The developer for this Project is Leeward Renewable Energy LLC. The Project is expected to be operational in March 2027. The renewable energy purchase agreement (referred to herein as PPA) provides that I&M will purchase all the renewable energy products (energy, capacity, and renewable energy certificates (RECs) by the facility for a term of 30 years. The Hoosier Line Project will be capable of producing enough energy to power approximately 54,000 homes.

9. The Meadow Lake IV Wind Project (Meadow Lake Project) is a repowering of an existing wind facility placed in service in 2010 and located in White County, Indiana. The developer for this Project is EDP Renewables North America. The Project is expected to be operational by December 31, 2025. I&M will initially purchase 76 MWs of a bundled product (energy and RECs) starting at the re-power operation and step up to 100 MWs starting in June 2032. I&M will be entitled to 100% of the accredited capacity from the Meadow Lake Project for the entire 20-year term of the PPA. The Meadow Lake Project will be capable of producing enough energy to power approximately 30,000 homes.

Requested Relief

10. The Clean Energy Projects are reasonable and necessary. I&M requests Commission approval of each Project as a Clean Energy Project pursuant to Ind. Code § 8-1-8.8-11, authorize timely cost recovery and approve other accounting and ratemaking relief, including recovery of PPA development costs. The Company proposes to administer timely cost recovery for the Clean Energy PPA Projects through I&M's Fuel

Cost Adjustment Clause (FAC).¹ Timely cost recovery is consistent with Ind. Code § 8-1-8.8-11 and Ind. Code § 8-1-2-42(a).

Applicable Law

11. I&M considers the provisions of the Public Service Commission Act, as amended, to be applicable to the subject matter of this Petition, including Ind. Code §§ 8-1-8.8-11, 8-1-2-10, 12, and 42(a), and 8-1-2-0.6.

I&M's Integrated Resource Plan and All-Source Request For Proposals.

12. Indiana's utility regulatory framework requires I&M to submit an Integrated Resource Plan (IRP) to the Commission every three years. Ind. Code § 8-1-8.5-3(e)(2); 170 Indiana Administrative Code (IAC) 4-7-2.

The IRPs are subject to a rigorous stakeholder process. IRPs describe how the utility plans to deliver safe, reliable, and efficient electricity at just and reasonable rates. Further, these plans must be in the public interest and consistent with state energy and environmental policies. Each utility's IRP explains how it will use existing and future resources to meet customer demand. When selecting these resources, the utility must consider a broad range of potential future conditions and variables and select a combination that would provide reliable service in an efficient and cost-effective manner.²

13. I&M's most recent IRP was submitted to the Commission on January 31, 2022 ("2021 IRP").³ The study period for I&M's 2021 IRP is 2022-2041.

14. I&M is undergoing a major generation transformation as Rockport Unit 2 has fully transitioned to a merchant Unit and Rockport Unit 1 will retire from service by

¹ This proposed cost recovery mechanism is consistent with cost recovery for the PPAs approved in Indiana Michigan Power Company, Cause No. 45868 (IURC 10/18/2023) at 27-30, 32, 33 .

² <https://www.in.gov/iurc/energy-division/electricity-industry/integrated-resource-plans/>.

³ *Id.*

the end of 2028. The retirement of these units provides a significant opportunity for I&M to further diversify I&M's generation portfolio and reduce its carbon emissions.

15. In accordance with the Commission's rules, I&M's 2021 IRP includes a Preferred Portfolio. I&M has prepared the Preferred Portfolio with a near-term plan, 2022–2028, and a long-term indicative plan, 2029–2041. The near-term plan addresses resource needs through 2028 and is inclusive of the Company's Short-Term Action Plan. The long-term-indicative plan includes the resource decisions that the Company will need to make from 2029 through the end of the planning period in 2041.⁴

16. I&M issued an All Source Request for Proposal on March 31, 2023. I&M contracted Charles River Associates (CRA) to serve as an independent monitor. CRA also managed the stakeholder process on behalf of the Company and ensured stakeholder feedback was received by the Company and reasonably considered in the RFP process.

17. I&M ultimately entered into the Clean Energy Project PPAs, which are an important step in replacing the capacity and energy from the Rockport facility by the end of 2028.

Procedural and Other Matters

18. I&M is filing its case-in-chief contemporaneous with its Petition, including direct testimony, attachments, and workpapers. Per Commission General Administrative Order (GAO) 2020-05 and GAO 2023-04 an index of the filing is attached to this Petition

⁴ I&M 2021 IRP Report at 6.

as Exhibit A.

19. A Motion for Protective Order and supporting affidavits are being filed contemporaneous with this Petition to protect certain confidential, proprietary, competitively sensitive, and/or trade secret information included with I&M's filing from public disclosure.

20. I&M seeks a final Commission order within 120 days consistent with Ind. Code § 8-1-8.8-11. The current generation procurement landscape is rapidly evolving and a timely decision in this proceeding is a significant milestone in being able to move the Clean Energy Projects forward.

21. In accordance with 170 IAC 1-1.1-9(a)(8), I&M will work with the Indiana Office of Utility Consumer Counselor (OUCC) and any intervenors to come to agreement on a proposed procedural schedule and associated terms and will file any such agreement in this Cause. I&M contemplates the following schedule:

Day 0	Thurs. June 20, 2024	I&M Petition & Filing of Case in Chief.
Day 55	Wed. Aug. 14, 2024	OUCC and Intervenors Filing of Case in Chief.
Day 71 (15 days)	Fri. Aug. 30, 2024	I&M's Rebuttal/OUCC & intervenors Cross Answering, if any.
Day 83-85 (12-14 days)	Sept. 11-13, 2024 (one day)	Evidentiary hearing.
Day 92 (7 days)	Fri. Sept. 20, 2024	I&M proposed order/post hearing brief.
Day 99 (7 days)	Fri. Sept. 27, 2024	OUCC and any intervenor proposed order/brief.
Day 106 (7 days)	Fri. Oct. 4, 2024	I&M Reply.
Day 120 (14 days)	Fri. Oct. 18, 2024	Statutory Order Date (IC 8-1-8.8-11)

Other Terms:

Service: The parties will provide same day service of filings via email, hand delivery or large file transfer.

Discovery: Discovery is available to all parties and shall be conducted on an informal basis. Any response or objection to a discovery request shall be made within ten calendar days of the receipt of such request until August 14, 2024. Thereafter, any response or objection to a discovery request shall be made within five calendar days of the receipt of such request. Any discovery communication received after noon on a Friday or state holiday, or after 5:00 pm on any other day shall be deemed to have been received on the following business day. There will be blackout dates for discovery from August 31, 2024 through Monday, September 2, 2024. Dates designated as “blackout dates” shall not be included in determining the number of days provided for responding to a discovery request.

The parties may conduct discovery through electronic means. The parties agree to serve all parties with discovery requests and responses.

Workpapers: When prefiling technical evidence with the Commission, each party shall file copies of the work papers used to produce that evidence within two business days after the prefiling of such technical evidence. Copies of the same shall also be served on the other parties to this Cause.

Number of Copies/Corrections: Filings with the Commission shall comply with General Administrative Order 2016-2. Any corrections to prefiled testimony shall be made in writing as soon as possible after discovery of the need to make such corrections.

Objections to Prefiled Testimony and Attachments: Any objections to the admissibility of prefiled testimony or attachments shall be filed with the Commission and served on all parties of record not less than five business days prior to the date scheduled for commencement of the hearing at which the testimony or exhibit will be offered into the record.

Petitioner’s Authorized Representatives

22. The names and address of I&M’s attorneys in this matter who are duly authorized to accept service of papers in this Cause on behalf of I&M are:

Teresa Morton Nyhart (Atty. No. 14044-49)
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WHEREFORE, I&M respectfully requests the Commission to promptly publish notice, make such investigation and hold such hearings as are necessary and advisable, and thereafter make and enter an order in this Cause:

- (i) approving the PPA with the Hoosier Line Solar Project as a Clean Energy Project;
- (ii) approving the PPA with the Meadow Lake IV Wind Project as a Clean Energy Project;
- (iii) authorizing, for both Clean Energy Projects, associated accounting and ratemaking, including timely cost recovery as proposed by I&M; and
- (iv) granting to I&M such other and further relief in the premises as may be

appropriate and proper.

Dated this 20th day of June, 2024.

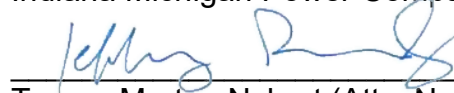
Respectfully submitted,

INDIANA MICHIGAN POWER COMPANY



David A. Lucas

Vice President – Regulatory and Finance
Indiana Michigan Power Company



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Attorneys for INDIANA MICHIGAN POWER
COMPANY

VERIFICATION

I, David A. Lucas, I&M Vice President – Regulatory and Finance, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information, and belief.

Dated: June 20, 2024




David A. Lucas

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served this 20th day of June, 2024, by electronic transmission or United States Mail, first class, postage prepaid on:

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Attorneys for INDIANA MICHIGAN POWER COMPANY

Indiana Michigan Power Company
Index of Issues, Requests, and Supporting Witnesses¹

The Petition seeks approval of two purchase power agreements (PPAs) under Ind. Code 8-1-8.8-11 and associated accounting and ratemaking, including timely recovery of costs through the Resource Adequacy Rider or successor rate adjustment mechanism in accordance with Ind. Code § 8-1-2-42(a). The following Index of Issues, Requests, and Supporting Witnesses is being provided in accordance with General Administrative Order (GAO) 2020-05.

I. Supporting Witnesses

I&M Witnesses		
Name	Position	Major Subject Area
David A. Lucas	Vice President – Regulatory and Finance, Indiana Michigan Power Company (I&M or Company).	<ul style="list-style-type: none">▪ Provides an overview of the relief I&M is seeking in this proceeding.▪ Discusses importance of a timely decision.▪ Describes the Company and its work to meet customers' ongoing needs and interests in reliable, affordable and sustainable generation resources through further diversification of generation resources.▪ Discusses the retirement of the Company's Rockport generating facility and the need to replace this capacity and energy to serve customers.▪ Introduces the renewable projects requested for approval in this case (referred to herein as Clean Energy Projects) and how they align with the Five Pillars.▪ Discusses the Five Pillars and benefits associated with the Clean Energy Projects.

¹ This Index of the Company's case-in-chief is intended to highlight issues and is not an exhaustive list of the Company's requests in this proceeding. A complete account of the Company's requested relief can be found in the Company's filing in this Cause, including the petition, case-in-chief, and workpapers.

Indiana Michigan Power Company Petition
Exhibit A

I&M Witnesses (cont'd)		
Name	Position	Major Subject Area
Mark A. Becker	Managing Director of Resource Planning and Operational Analysis, American Electric Power Service Corporation (AEPSC).	<ul style="list-style-type: none"> ▪ Provides an overview of I&M's 2021 Integrated Resource Plan (IRP) process and resulting Preferred Portfolio and Short-Term Action plan. ▪ Presents the results of the Portfolio Optimization Analysis (POA) used to support the final selection of projects. ▪ Discusses what conclusions can be drawn from the POA's selection of the Clean Energy Projects. ▪ Describes the Company's consideration of IRP resource alternatives.
Timothy B. Gaul	Director – Regulated Infrastructure Development, AEPSC.	<ul style="list-style-type: none"> ▪ Discusses market factors. ▪ Discusses project offers received and integrated into the RFP process. ▪ Reviews the structure and terms of the executed PPAs, including price. ▪ Outlines due diligence.
D. Dean Koujak	Principal, Charles River Associates.	<ul style="list-style-type: none"> ▪ Introduces and describes CRA's role and conclusions as the Independent Monitor for I&M's procurement process under the 2023 All Source RFP. ▪ Discusses the post short-list negotiation process. ▪ Presents Independent Monitor's Report.

(cont'd on next page)

Indiana Michigan Power Company Petition
Exhibit A

I&M Witnesses (cont'd)		
Name	Position	Major Subject Area
Justin T. Dehan	Manager, Regulated Infrastructure Development, AEPSC	<ul style="list-style-type: none"> Provides overview of 2023 All Source RFP. Reviews RFP development and issuance process and engagement of Independent Monitor. Describes review and scoring/ranking of proposals, bid confirmation process, and selection of a shortlist.
Joshua Burkholder	Managing Director of RTO Strategy and Policy, AEPSC	<ul style="list-style-type: none"> Explains capacity market changes regarding accreditation and risk modeling that in turn affects the planning reserve margin that have taken place in PJM resulting in updated assumptions in the POA presented by Company witness Becker. Addresses changes in the generation interconnection process within PJM and how the new generation interconnection process is designed, which had an impact on the short-listing process in the 2023 All Source RFP described by Company witnesses Dehan and Gaul.
Bartley Taberner	Transmission Planning Manager for East Transmission Planning in AEPSC's Grid Solutions.	<ul style="list-style-type: none"> Presents response to Commission's GAO 2022-01 in Attachment BT-1 (which is co-sponsored by Company witnesses Becker, Lucas and Gaul as indicated on the attachment). Explains the transmission interconnection to the PJM RTO and cost estimates for the Clean Energy Projects.

(cont'd on next page)

Indiana Michigan Power Company Petition
Exhibit A

I&M Witnesses (cont'd)		
Name	Position	Major Subject Area
Edward J. Locigno	Manager Regulatory Analysis & Case, AEPSC.	<ul style="list-style-type: none"> ▪ Addresses the accounting and ratemaking associated with the Clean Energy Projects. ▪ Discusses request for timely cost recovery to be administered through I&M's FAC for the costs incurred under the PPAs. ▪ Supports the recovery of development costs associated with the PPAs. ▪ Provides an estimate of the overall incremental rate impact of the PPAs to I&M's customers. ▪ Explains how I&M plans to utilize the renewable energy certificates (RECs) from the Clean Energy Projects to benefit customers.

II. Index of Issues and Requests

Subject	General	Witness/Other Reference
Statutory Framework	<ul style="list-style-type: none"> IC 8-1-8.8-11 (Clean Energy Project and timely cost recovery). IC 8-1-2-10, 12, 42 (Other Accounting & Ratemaking Authority). IC 8-1-2-0.6 (Five Pillars). 	<ul style="list-style-type: none"> Petition, ¶11.
Case Timeline	<ul style="list-style-type: none"> 120 Days. 	<ul style="list-style-type: none"> IC 8-1-8.8-11(d). Petition, ¶20. Lucas, Q/A 28.
I&M characteristics	<ul style="list-style-type: none"> Service area. Generating Resource Portfolio. 	<ul style="list-style-type: none"> Petition, ¶2. Lucas, Q/As 9, 10-14.
Project Description		
Hoosier Line PPA Meadow Lake IV PPA	<ul style="list-style-type: none"> The Hoosier Line Solar Project (Hoosier Line Project) will be located in White County, Indiana and will produce 180 MWs of solar generation. The developer for this project is Leeward Renewable Energy LLC. The Project is expected to be operational in March 2027. The renewable energy purchase agreement (referred to herein as PPA) provides that I&M will purchase all the renewable energy products (energy, capacity, and renewable energy certificates (RECs)) by the facility for a term of 30 years. The Hoosier Line Project will be capable of producing enough energy to power approximately 54,000 homes. The Meadow Lake IV Wind Project (Meadow Lake Project) is a repowering of an existing wind facility placed in service in 2010 and located in White County, Indiana. The developer for this project is EDP Renewables North America. The project is expected to be operational by December 31, 2025. I&M will initially purchase 76 MWs of a bundled product (energy and RECs) starting at the re-power operation and step up to 100 MWs starting in June 2032. I&M will be entitled to 100% of the accredited capacity from the Meadow Lake Project for the entire 20-year term of the PPA. The Meadow Lake Project will be capable of producing enough energy to power approximately 30,000 homes. 	<ul style="list-style-type: none"> Petition, ¶¶8-9. Lucas, QA 17. Gaul, Q/A 14-19.

Indiana Michigan Power Company Petition
Exhibit A

	Index of Issues and Requests (cont'd)	
	Relief Requested	
I&M request	<ul style="list-style-type: none"> The Clean Energy Projects are reasonable and necessary. I&M requests Commission approval of each Project as a Clean Energy Project pursuant to Ind. Code § 8-1-8.8-11, authorize timely cost recovery and approve other accounting and ratemaking relief, including recovery of PPA development costs. The Company proposes to administer timely cost recovery for the Clean Energy PPA Projects through I&M's FAC. Timely cost recovery is consistent with Ind. Code § 8-1-8.8-11 and Ind. Code § 8-1-2-42(a). I&M will begin including the costs associated with the PPAs in I&M's monthly over- / under-accounting when I&M begins incurring such costs. 	<ul style="list-style-type: none"> Petition, ¶10. Lucas, Q/A 18-19. Locigno, Q/A 11-13.
IC 8-1-8.8-6	<ul style="list-style-type: none"> I&M is an "eligible business." 	<ul style="list-style-type: none"> Petition, ¶13. Lucas, Q/A 19.
IC 8-1-8.8-2, 10	<ul style="list-style-type: none"> The Projects are within the definition of "Clean Energy Project." 	<ul style="list-style-type: none"> Lucas, Q/A 19.
IC 8-1-8.8-11	<ul style="list-style-type: none"> Each PPA is reasonable and necessary. 	<ul style="list-style-type: none"> Petition, ¶10. Lucas, Q/As 17, 20-23, 29-30. Gaul, Q/As 9-21. Becker, Sections III-VIII.
IC 8-1-8.8-11 (a)(1), (4) & (5)	<ul style="list-style-type: none"> Project Costs. Project Development Costs. Accounting and Ratemaking, including timely cost recovery. 	<ul style="list-style-type: none"> Gaul, Section IV. Taberner, Q/A 17. Locigno, Section IV.

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	Index of Issues and Requests (cont'd)	
	IRP, All Source RFP and Project Evaluation/Selection	
IRP and All Source Solicitation Process	<ul style="list-style-type: none"> • I&M is undergoing a major generation transformation as Rockport Unit 2 has fully transitioned to a merchant unit and Rockport Unit 1 will retire from service by the end of 2028. • The PPAs are consistent with the Company's 2021 IRP and POA. • I&M's IRP process and POA have clearly established a need for capacity. • The Clean Energy Projects requested in this proceeding are needed to ensure the Company can meet its future customer load obligations as determined by PJM. • The Company conducted an All-Source RFP to solicit responses from the market for capacity resource needs identified in the Company's Preferred Portfolio for the 2028/2029 PJM Planning Year due to the retirement of the Rockport Plant. • The Company performed a POA to account for market changes since the 2021 IRP. The analysis provided further support for the selection of generation resources from the 2023 All Source RFP by considering updates to PJM policy and changes in the Company's capacity needs, and the lack of wind generation available in PJM. As a result of the POA, the Clean Energy Projects were determined to best fulfill I&M's capacity needs consistent with the 2021 IRP. 	<ul style="list-style-type: none"> ▪ Lucas, Sections IV and VII. ▪ Becker Sections – III-VIII. ▪ Dehan, Sections III-V. ▪ Koujak, Sections 3-6.
Project Evaluation/Selection	<ul style="list-style-type: none"> • The proposal review and project selection process involved the following general steps: <ul style="list-style-type: none"> -Proposal Clarification and Eligibility & Threshold (E&T) Review -Detailed Analysis & Due Diligence -Phase 1 Ranking: Top Ranked Proposals by Type Advance to Bid Confirmation -Bid Confirmation: Verification of Key Terms, Bid Assumptions, and Price -Phase 2 Ranking: Top Ranked Proposals Overall Advance to Shortlist -Selection to Shortlist -POA -Project Selection 	<ul style="list-style-type: none"> ▪ Dehan, Section V. ▪ Gaul, Sections II-III. ▪ Becker, Section V.

Indiana Michigan Power Company Petition
Exhibit A

	Index of Issues and Requests (cont'd)	
	IRP, All Source RFP and Project Evaluation/Selection (cont'd)	
Project Evaluation/Selection	<ul style="list-style-type: none"> The proposal review and project selection process involved the following general steps: <ul style="list-style-type: none"> -Proposal Clarification and Eligibility & Threshold (E&T) Review -Detailed Analysis & Due Diligence -Phase 1 Ranking: Top Ranked Proposals by Type Advance to Bid Confirmation -Bid Confirmation: Verification of Key Terms, Bid Assumptions, and Price -Phase 2 Ranking: Top Ranked Proposals Overall Advance to Shortlist -Selection to Shortlist -POA -Project Selection 	<ul style="list-style-type: none"> Dehan, Section V. Gaul, Sections II-III. Becker, Section V.
Consideration of resource alternatives	<ul style="list-style-type: none"> The Company considered a number of options in the IRP process including conventional thermal generation, renewable energy, energy storage, several types of demand-side management including demand response, load management, conservation, conservation voltage reduction and cogeneration. 	<ul style="list-style-type: none"> Becker, Section VII. Dehan, Section III.
	GAO 2022-01	
RTO	<ul style="list-style-type: none"> The information requested by GAO 2022-01 as it applies to the Clean Energy Projects is provided in Attachment BT-1. 	<ul style="list-style-type: none"> Taberner (and co-sponsored by witnesses, Becker, Lucas, and Gaul as indicated on the attachment).

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	Index of Issues and Requests (cont'd)	
	Five Pillars and Benefits	
IC 8-1-2-0.6	<ul style="list-style-type: none"> • The objectives and metrics that I&M used during the 2021 IRP process to determine the Preferred Portfolio were very closely aligned with the Five Pillars. • The Clean Energy Projects are a critical element in implementing I&M's Preferred Portfolio and supports the Five Pillars as described below: • Reliability – The Clean Energy Projects are necessary to provide reliable capacity and energy to replace Rockport once it retires in 2028. As discussed by Company witness Becker, the Clean Energy Projects are consistent with the Preferred Portfolio from the Company's 2021 IRP, which included metrics for reliability. • Affordability – The Clean Energy Projects were selected from the Company's 2023 All-Source Request for Proposal (RFP) using both price (60%) and non-price (40%) scoring as discussed by Company witness Dehan. Further, as discussed by Company witness Locigno, the overall estimated year one rate impact inclusive of the Clean Energy Projects, the Lawrenceburg CPA6, and the projects approved in Cause Nos. 458687 and 45869, combined with the cost reductions associated with the retirement of Rockport Units 1 and 2, results in a net savings for I&M's customers. • Resiliency and Stability – As discussed further by Company witness Becker, the Clean Energy Projects allow I&M to further diversify its generation resource portfolio which includes a combination of dispatchable and intermittent resources of various technology types. A diverse set of generation resources, that will be in different locations throughout the state of Indiana and southwest Michigan, will provide the Company with optionality on how to manage the overall system in the event of disruptions or off-nominal events. • Environmental Sustainability – The Clean Energy Projects will provide emission free energy to serve I&M's customers. The renewable energy certificates (RECs) that will be generated from the Clean Energy Projects will be utilized through Commission approved programs to meet customers' interest in renewable energy. • The Clean Energy Project have many benefits for I&M's customers, including economic development benefits, environmental benefits, diversity of generation resources, renewable energy certificate benefits, and local economic benefits. 	<ul style="list-style-type: none"> ▪ Lucas Q/As 16, 29. ▪ Becker, Attachment MAB-1 IRP Report, pp. 10-13, 15-19, 138, 148-155. ▪ Locigno, Section V; Attachments ELJ-1, EL-2, and ELJ-2C.