

FILED
October 14, 2019
**INDIANA UTILITY
REGULATORY COMMISSION**

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN POWER COMPANY, AN INDIANA CORPORATION, FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE THROUGH A PHASE IN RATE ADJUSTMENT; AND FOR APPROVAL OF RELATED RELIEF INCLUDING: (1) REVISED DEPRECIATION RATES; (2) ACCOUNTING RELIEF; (3) INCLUSION IN RATE BASE OF QUALIFIED POLLUTION CONTROL PROPERTY AND CLEAN ENERGY PROJECT; (4) ENHANCEMENTS TO THE DRY SORBENT INJECTION SYSTEM; (5) ADVANCED METERING INFRASTRUCTURE; (6) RATE ADJUSTMENT MECHANISM PROPOSALS; AND (7) NEW SCHEDULES OF RATES, RULES AND REGULATIONS.

CAUSE NO. 45235

**INDIANA COAL COUNCIL'S
NOTICE OF CORRECTION TO PREFILED TESTIMONY**

The Indiana Coal Council, Inc. (ICC), by counsel, provides notice to the Indiana Utility Regulatory Commission (Commission) of corrections to the prefiled direct testimony of Emily S. Medine. The sole correction is on page 4 of Ms. Medine's Direct Testimony. A redlined version of page 4 showing the correction is attached to this Notice. The ICC is also concurrently providing a copy of this Notice of Correction to all parties in this Cause. The ICC intends to offer a corrected version of Ms. Medine's Direct Testimony at the evidentiary hearing in this Cause.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JAE', positioned above a horizontal line.

Jeffery A. Earl, Atty. No. 27821-64

BOSE MCKINNEY & EVANS LLP

111 Monument Circle, Suite 2700

Indianapolis, IN 46204

(317) 626-0811

jearl@boselaw.com

Counsel for ICC

CERTIFICATE OF SERVICE

I certify that on October 14, 2019, a copy of this Notice of Correction was filed with the Indiana Utility Regulatory Commission using the Commission's e-filing system and was served electronically on the parties below:

I&M

Teresa Morton Nyhart
Jeffrey M. Peabody
Nicholas K. Kile
T. Joseph Wendt
Barnes & Thornburg LLP
tnyhart@btlaw.com
jpeabody@btlaw.com
nkile@btlaw.com
jwendt@btlaw.com

Matthew S. McKenzie
American Electric Power Service Corp.
msmckenzie@aep.com

CAC and INCAA

Jennifer Washburn
Margo Tucker
Citizens Action Coalition
jwashburn@citact.org
mtucker@citact.org

City of Marion

J. Christopher Janak
Kristina Kern Wheeler
Bose McKinney & Evans LLP
cjanak@boselaw.com
kwheeler@boselaw.com

SDI

Robert K. Johnson
RK Johnson, Attorney-At-Law
rjohnson@utilitylaw.us

Alliance Coal, LLC

Nikki Gray Shoultz
Bose McKinney & Evans LLP
nshoultz@boselaw.com

39 North Conservancy District

Shaw Friedman
Friedman & Associates
Sfriedman.associates@frontier.com

Keith Beall
Clark, Quinn, Moses, Scott & Grahn, LLP
kbeall@clarkquinnlaw.com

Kroger

Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz, and Lowry
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

Kevin Higgins
Energy Strategies, LLC
khiggins@energystrat.com

John P. Cook
John P. Cook & Associates
John.cookassociates@earthlink.net

Industrial Group

Bette J. Dodd
Joseph P. Rompala
Anne E. Becker
Amanda Tyler
Ellen Tenant
Lewis & Kappes P.C.
bdodd@lewis-kappes.com
jrompala@lewis-kappes.com
abecker@lewis-kappes.com
atyler@lewis-kappes.com
etenant@lewis-kappes.com

WVPA

Randolph G. Holt
Jeremy L. Fetty
Liane K. Steffes
Parr Richey
R_holt@wvpa.com
jfetty@parrlaw.com
lsteffes@parrlaw.com

City of South Bend

Robert Glennon
Robert Glennon & Assoc.
robertglennonlaw@gmail.com

Walmart, Inc.

Eric E. Kinder
Barry A. Naum
Spilman, Thomas, & Battle, PLLC
ekinder@spilmanlaw.com
bnaum@spilmanlaw.com

City of Auburn

W. Erik Weber
Mefford Weber and Blythe
erik@lawmwb.com

Mark W. Cooper

Attorney-At-Law

attymcooper@indy.rr.com

City of Fort Wayne, Indiana

Brian C. Bosma
Kevin D. Koons
Ted W. Nolting
Kroger Gardis & Regas, LLP
bcb@kgrlaw.com
kdk@kgrlaw.com
tw@kgrlaw.com

OUCC

Tiffany Murray
Indiana Office of Utility Consumer Counselor
infomgt@oucc.in.gov
tmurray@oucc.in.gov

1 requests related to base rates (Rate Case). My testimony provides a review of the
2 following components of I&M's Rate Case.

- 3 • Approval of revised depreciation rates;
- 4 • Inclusion in rate base of qualified pollution control equipment costs;
- 5 • Approval for enhancements to the dry sorbent injection (DSI) system; and
- 6 • Approval of an Environmental Cost Rider for Consumables and Allowances.

7
8 **Q. PLEASE SUMMARIZE THE FINDINGS OF YOUR REVIEW.**

- 9 A. 1. I&M has not provided sufficient evidence to justify not renewing/extending its
10 lease on Rockport Unit [24](#).
- 11 2. AEP has acknowledged that the Fifth Modification of the Consent Decree would
12 not have been required if AEP had complied with the deadline for retrofitting the
13 SCR on Rockport Unit 2.
- 14 3. The expected test year costs for the SO₂ control system I&M selected for
15 Rockport are higher than for other SO₂ control options and will limit the dispatch
16 of the Rockport units if they are recovered through an Environmental Compliance
17 Rider.

18
19 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

- 20 1. The Commission should not approve any of the requested changes to depreciation
21 rates related to Rockport Units 1 and 2.
- 22 2. The Commission should limit recovery of costs related to the Fifth Modification
23 because such costs are akin to a fine for failure to perform, not a regulatory