STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF **INDIANA MICHIGAN POWER** COMPANY, AN INDIANA CORPORATION, FOR (1) AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE THROUGH A PHASE IN RATE ADJUSTMENT; (2) APPROVAL OF: **ACCOUNTING** REVISED **DEPRECIATION** RATES; RELIEF; INCLUSION IN BASIC RATES AND CHARGES OF QUALIFIED POLLUTION CONTROL PROPERTY, **CAUSE NO. 44967** CLEAN ENERGY PROJECTS AND COST OF BRINGING I&M'S **SYSTEM** TO ITS PRESENT STATE **EFFICIENCY**; RATE **ADJUSTMENT MECHANISM** PROPOSALS: COST DEFERRALS; MAJOR STORM DAMAGE RESTORATION RESERVE DISTRIBUTION VEGETATION **MANAGEMENT** PROGRAM RESERVE; AND AMORTIZATIONS; AND (3) FOR APPROVAL OF NEW SCHEDULES OF RATES, RULES AND REGULATIONS.

SUBMISSION OF RESPONSE TO DOCKET ENTRY DATED MARCH 1, 2018

Indiana Office of Utility Consumer Counselor ("OUCC"), the City of S. Bend, City of Marion Utilities, City of Muncie, City of Ft. Wayne, Kroger, 39 North Conservancy District, Wal-Mart Stores East, LP and Sam's East, Inc., Citizens Action Coalition of Indiana, Indiana Coalition for Human Services, Indiana Community Action Association, and Sierra Club by counsel, hereby submit the attached response to the Docket Entry dated March 1, 2018.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served upon the following via electronic email, hand delivery or First Class, or United States Mail, postage prepaid this 2nd day of March, 2018 to:

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Docket Entry Request No. 3-1

Request

As a part of the Settlement Agreement, is I&M committing to implement a four-year cycle for vegetation management and, if so, by what date?

Response

The OUCC and other Settling Parties defer to I&M's answer to this question.

Docket Entry Request No. 3-2

Request

The Settlement Agreement is silent on the issue of creating a collaborative process to develop performance metrics for I&M across a range of company operations, similar to that implemented for IPL and NIPSCO. Do the Settling Parties see a directive by the Commission to create a collaborative process as detrimental to the implementation of the Settlement Agreement?

Response

The OUCC and most of the other Settling Parties see the Commission's consideration for a performance metrics collaborative process as beneficial and would not object to it. A voluntary collaborative process is implied in the Settlement regarding I&M's commitment to work with the Joint Municipals on issues of weatherization, electric vehicles, low income assistance, and other matters. The Settlement also provides for I&M to provide the OUCC and other Settling Parties with information in I&M's on-going filings with PJM. The OUCC and other Settling Parties welcome the opportunity to engage with I&M, and if deemed appropriate, with the Commission and its staff, in a collaborative manner on a range of issues.