

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF DUKE ENERGY )  
INDIANA, LLC, INDIANA MICHIGAN POWER )  
COMPANY, INDIANAPOLIS POWER & LIGHT )  
COMPANY D/B/A AES INDIANA, NORTHERN )  
INDIANA PUBLIC SERVICE COMPANY, LLC, )  
SOUTHERN INDIANA GAS & ELECTRIC )  
COMPANY D/B/A CENTERPOINT ENERGY )  
INDIANA SOUTH, FOR EMERGENCY AND )  
EXPEDITED DETERMINATIONS THAT CERTAIN ) CAUSE NO. 45744  
INFORMATION CONTAINED IN REPORTS )  
SUBMITTED TO THE COMMISSION PURSUANT )  
TO IND. CODE § 8-1-8.5-13 IS CONFIDENTIAL )  
AND EXEMPT FROM DISCLOSURE PURSUANT )  
TO 170 IAC 1-1.1-4, IND. CODE § 8-1-8.5-13, IND. )  
CODE § 8-1-2-29, IND. CODE § 5-14-3-4, AND IND. )  
CODE § 8-1-2-113 )

**INDIANA MICHIGAN POWER COMPANY'S  
SUBMISSION OF REDACTED 1520 RESPONSES**

Indiana Michigan Power Company ("I&M", "Company", or "Petitioner"), by counsel,  
in accordance with the July 13, 2022 Docket Entry in this Cause, respectfully submits the  
attached public version of its HEA 1520 Responses.

Respectfully submitted,



---

Jeffrey M. Peabody (No. 28000-53)  
Barnes & Thornburg LLP  
11 South Meridian Street  
Indianapolis, Indiana 46204  
Peabody Telephone: (317) 231-6465  
Facsimile: (317) 231-7433  
Peabody Email: jpeabody@btlaw.com

ATTORNEY FOR PETITIONER  
INDIANA MICHIGAN POWER COMPANY

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served this 25th day of July, 2022, via email transmission to:

William I. Fine  
Randall C. Helmen  
Kelly Earls  
Office of Utility Consumer Counselor  
PNC Center  
Suite 1500 South  
115 W. Washington Street  
Indianapolis, Indiana 46204  
wfine@oucc.in.gov  
rhelmen@oucc.in.gov  
keearls@oucc.in.gov  
infomgt@oucc.in.gov

Kay E. Pashos  
Ice Miller LLP  
One American Square, Suite 2900  
Indianapolis, Indiana 46282-0200  
kay.pashos@icemiller.com

Teresa M. Nyhart  
Barnes & Thornburg LLP  
11 South Meridian Street  
Indianapolis, Indiana 46204  
tnyhart@btlaw.com

Jennifer A. Washburn  
Citizens Action Coalition  
1915 West 18th Street, Suite C  
Indianapolis, Indiana 46202  
jwashburn@citact.org

Courtesy Copy to:  
Reagan Kurtz  
rkurtz@citact.org

Heather Watts  
Jeffrey A. Earl  
Centerpoint Energy, Inc.  
One Vectren Square  
211 N.W. Riverside Drive  
Evansville, Indiana 47708  
Heather.Watts@centerpointenergy.com  
Jeffery.Earl@centerpointenergy.com

Liane Steffes  
Associate General Counsel  
Duke Energy Business Services LLC  
1000 East Main Street  
Plainfield, Indiana 46168  
liane.steffes@duke-energy.com

Bryan Likins  
NiSource Corporate Services – Legal  
150 West Market, Suite 600  
Indianapolis, IN 46204  
blinkins@nisource.com



---

Jeffrey M. Peabody

Jeffrey M. Peabody (No. 28000-53)  
Barnes & Thornburg LLP  
11 South Meridian Street  
Indianapolis, Indiana 46204  
Peabody Telephone: (317) 231-6465  
Facsimile: (317) 231-7433  
Peabody Email: jpeabody@btlaw.com

ATTORNEY FOR PETITIONER  
INDIANA MICHIGAN POWER COMPANY

**- Pre 12/08/2022**

Note: Final except for DR, which is to be finalized by PJM by June 1, 2022

Reliability Adequacy Metrics <i>[defined in IC 8-1-8.5-13(e)]</i>	
Summer RA Metric <i>IC 8-1-8.5-13(e)(1)</i>	Winter RA Metric <i>IC 8-1-8.5-13(e)(2)</i>
	Winter UCAP/PRM Requirement = N/A - See Post 12/07/22 Tab

## INDIANA MICHIGAN POWER COMPANY

Note: Preliminary estimate, expected to be finalized PJM by June 1, 2022.

[illegible]

Contracted Resource <i>IC 8-1-8.5-13(i)(2) definition</i>	ICAP (MW) <i>Nameplate capacity</i>	Summer UCAP (MW) <i>IC 8-1-8.5-13(f) definition</i>	Winter UCAP (MW) <i>IC 8-1-8.5-13(g) definition</i>	Location: <i>RTO</i> <i>interconnection zone</i>	Fuel Source	Additional Comments
OVEC	166.0			PJM RTO	Coal	
FOWLER RIDGE WF	100.0			PJM RTO	Wind	
FOWLER RIDGE 2 WF	50.0			PJM RTO	Wind	
HEADWATERS WF	200.0			PJM RTO	Wind	
WILDCAT 1B WF	100.0			PJM RTO	Wind	
IMPA	53.4			PJM RTO	Various	Wholesale Customer Cap.
				PJM MAAC	Gas	MI Self-Supply Capacity (MI specific resource)

[illegible]

RTO established Planning Reserve Margin requirement (see IC 8-1-8.5-13 (i)(4))	Summer Demand 3,766.3 MWx(1+ % PRM 9.06) = 4,107.5 MW	*Note, this value reflects the final 22/23 I&M load obligation
---	---	--

Please describe any other federal reliability requirement:	
--	--

Reliability Adequacy Metrics <i>[defined in IC 8-1-8.5-13(e)]</i>		
Summer RA Metric IC 8-1-8.5-13(e)(1)	Winter RA Metric 8-1-8.5-13(e)(2)	IC
Summer UCAP/PRM Requirement = N/A - See Pre 12/08/2022 Tab		



Reliability Adequacy Metrics <i>[defined in IC 8-1-8.5-13(e)]</i>		
Summer RA Metric <i>IC 8-1-8.5-13(e)(1)</i>	Winter RA Metric <i>8-1-8.5-13(e)(2)</i>	<i>IC</i>



An AEP Company

BOUNDLESS ENERGY™

Indiana Michigan Power  
P O Box 60  
Fort Wayne, IN 46801  
indianamichiganpower.com

**CONFIDENTIAL: EXCLUDED FROM PUBLIC ACCESS PER ACCESS TO COURT RULE 5**

July 6, 2022

To: Ryan Heater, Indiana Utility Regulatory Commission

Re: Resource Adequacy, I.C. 8-1-8.5-13 (HB 1520)

Indiana Michigan Power Company (I&M or Company) provides the following response to the Indiana Utility Regulatory Commission (IURC)'s data summary.

**Q1 Do you agree or disagree with the summary included below?**

A1 Agree.

**Q2 If you disagree, please explain any corrections.**

A2 Not applicable.

**Q3 What are the action plans you expect to implement to address the resources not yet at a commitment-level certainty (in bold) below?**

A3 PY 23/24 74MW DRR increase – I&M anticipates DRR commitments in PY 22/23 reaching approximately 350MW; the remaining DRR requirements for PY 23/24 will be achieved through normal program growth.

[REDACTED]

**Q4 Are there any other data or details to explain the certainty and risk of any action identified as being needed in advance of PY 23/24 and PY 24/25?**

A4 I&M would categorize the actions described above for PY 23/24 as relatively low risk.

[REDACTED]

[REDACTED]

BOUNDLESS ENERGY™