

STATE OF INDIANA
 INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE VERIFIED) PETITION OF INDIANA MICHIGAN) POWER COMPANY FOR APPROVAL) OF DEMAND SIDE MANAGEMENT) (DSM) PLAN, INCLUDING ENERGY) EFFICIENCY (EE) PROGRAMS, AND) ASSOCIATED TREATMENT,) INCLUDING TIMELY RECOVERY) THROUGH I&M’S DSM/EE) PROGRAM COST RIDER OF) ASSOCIATED COSTS, INCLUDING) PROGRAM OPERATING COSTS,) NET LOST REVENUE, AND) FINANCIAL INCENTIVES.))	CAUSE NO. 45285	
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**CITY OF SOUTH BEND NOTICE OF CORRECTIONS OR ALTERNATIVE REQUEST
 FOR LEAVE TO MAKE NECESSARY CORRECTIONS**

The City of South Bend (“South Bend”) hereby provides notice of corrections to its prefiled testimony in this Cause filed herewith, or in the alternative requests Commission’s leave to make these necessary corrections. In support thereof South Bend states.

1. The prehearing conference Order in this Cause states that corrections to prefiled testimony should be made in writing as soon as possible after discovering the need to make such corrections (Order p. 3). The necessary corrections provided herewith comply with that requirement.

2. South Bend’s case in chief testimonies in this current Cause were timely prefiled on January 31, 2020, prior to I&M’s March 11, 2020 base rates case Order in Cause No. 45235 (“Base Rate Order”). South Bend’s rate case testimonies addressed I&M’s PES program and

PES rates as they would have been prior to the Base Rate Order impact's upon PES rates and on South Bend's interests in and participation in this current DSM Cause.

3. South Bend's January 31, 2020 filed testimonies in this current Cause did not reflect the Base Rate Order's impacts on the PES program, the PES rates and the required information exchange between I&M and South Bend.

4. I&M's recent base rate order in Cause No. 45235 impacts I&M proposed PES LED rates and the program in multiple ways including: (a) The Base Rate Order approved a 50% reduction in the streetlight class rates (Order p. 89). (b) The Base Rate Order approved an aggregate annual revenue requirement lower than that requested by I&M. (c) The Base Rate Order instructed South Bend to participate in and provide input upon I&M's revised PES Program in this current Cause No. 45285 (Order p. 116). (d) The Base Rate Order required I&M to meet and work with South Bend regarding its concerns with the design and implementation of the PES Program LED retrofits. *Id.* Such a beneficial meeting has recently occurred telephonically enhancing each participants understanding of each other's concerns, interests, needs and hopefully enhancing the potential for mutual agreement.

5. On March 31, 2020 I&M filed a Petition for Reconsideration Clarification or Rehearing in the base rate case, creating some chance that the Base Rate Order revenue requirements might be changed, resulting in a changed I&M aggregate annual revenue requirement and in turn changed PES LED rates. However that Petition was denied on May 20, 2020.

6. On May 5, 2020 I&M supplemented its response to South Bend's Data Request 4-01 by providing the PES rates it believes will result from this current Cause. I&M has not filed updated PES LED retrofit rates in this current Cause to reflect the PES rate impacts steaming

from the Base Rate Order subsidy and revenue requirement findings. Those rates are provided in South Bend's witness Seelye Corrected Attachments.

7. Provided herewith are clean versions of the corrected testimonies of Mr. Seelye with Attachments and Mr. Sommer, with courtesy redlined versions also served on all Parties and the assigned ALJ. These changes are necessary to make those testimonies accurate and reflective of the changes to PES considerations created by the Base Rate Order's approval, requirements its affirmation by the Commission and new information.

8. These changes are being made as soon as possible after discovering the need to make them and promote public convenience and modernization of I&M's municipal streetlights.

9. These necessary corrections may also promote administrative efficiency by serving to reduce the amount of South Bend's cross examination of I&M witnesses at the hearing in this current Cause.

WHEREFORE, the City of South Bend respectfully requests that the Commission accept the attached Correct Testimonies of Mr. Seelye and Mr. Sommer or, if deemed necessary by the Commission, grant South Bend leave to make these necessary corrections.

Respectfully Submitted,

/s/ R.M. Glennon

Robert M. Glennon

Attorney #8321-49

Robert M. Glennon

Robert Glennon & Associates. P.C.

3697 N. Co. Road 500 E.

Danville, IN 46122

Telephone: 317-852-2723

Fax: 317 852-0115

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May, 2020, copies of the foregoing have been served by electronic mail upon the following:

Teresa Morton Nyhart
Jeffrey M. Peabody
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204
tnhart@btlaw.com
jpeabody@btlaw.com

Karol Krohn
Jeff Reed
Indiana Office of Utility Consumer Counselor
115 West Washington Street, Suite 1500 S
Indianapolis, IN 46204
kkrohn@oucc.in.gov
infomgt@oucc.in.gov

Jennifer A. Washburn
Margo Tucker
Citizens Action Coalition
1915 West 18th Street, Suite C
jwashburn@citact.org
mtucker@citact.org

Mathew S. McKenzie
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
msmckenzie@aip.com

/s/ R.M. Glennon

Robert M. Glennon

Attorney #8321-49

Robert M. Glennon

Robert Glennon & Associates. P.C.

3697 N. Co. Road 500 E.

Danville, IN 46122

Telephone: 317-852-2723

Fax: 317 852-0115