STATE OF INDIANA INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS)	
POWER & LIGHT COMPANY ("IPL"), AN)	FILED
INDIANA CORPORATION, FOR (1))	APRIL 18, 2017
CERTIFICATES THAT PUBLIC CONVENIENCE)	AF KIL 16, 2017
AND NECESSITY ("CPCN") WILL BE SERVED)	INDIANA UTILITY
BY COMPLIANCE PROJECTS TO ALLOW IPL)	
TO COMPLY WITH FEDERALLY MANDATED)	REGULATORY COMMISSION
REQUIREMENTS AT PETERSBURG)	
GENERATING STATION; (2) APPROVAL OF)	
ASSOCIATED ACCOUNTING AND)	CAUSE NO. 44794
RATEMAKING TREATMENT, INCLUDING)	
COST RECOVERY IN ACCORDANCE WITH)	
IND. CODE § 8-1-8.4-7 AND AUTHORITY TO)	
DEFER COSTS UNTIL SUCH COSTS ARE)	
REFLECTED IN RATES; AND 3) TO THE)	
EXTENT NECESSARY OR APPROPRIATE)	
ISSUANCE OR MODIFICATION OF CPCN FOR)	
THE USE OF CLEAN COAL TECHNOLOGY)	
PURSUANT TO IND. CODE CH. § 8-1-8.7)	

SUBMISSION OF REDACTED PETITION TO REOPEN THE EVIDENTIARY RECORD

Citizens Action Coalition and Sierra Club (collectively, "Joint Intervenors") respectfully

submit the following Redacted Petition to Reopen the Evidentiary Record and associated

attachments and exhibits, under seal, in the above captioned Cause to the Indiana Utility

Regulatory Commission. The unredacted version was filed under seal as it contains information

deemed confidential by Indianapolis Power & Light and is protected on a preliminary basis

pursuant to the Commission's Docket Entry issued on June 15, 2016.

Respectfully submitted,

Jennifer A. Washburn, Atty. No. 30462-49 Citizens Action Coalition of Indiana, Inc. 603 East Washington Street, Suite 502 Indianapolis, Indiana 46204 Phone: (317) 735-7764 Fax: (317) 290-3700 jwashburn@citact.org

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail or U.S.

Mail, first class postage prepaid, this 18th day of April, 2017, to the following:

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

Robert K. Johnson 2454 Waldon Drive Greenwood, Indiana 46143 rjohnson@utilitylaw.us

Randall Helmen Lorraine Hitz-Bradley Indiana Office of Utility Consumer Counselor 115 W. Washington Street, Suite 1500 South Indianapolis, Indiana 46204 rhelmen@oucc.IN.gov lhitzbradley@oucc.IN.gov infomgt@oucc.IN.gov

Anne Becker Joseph Rompala Lewis & Kappes, P.C. One American Square, Ste. 2500 Indianapolis, Indiana 46282 abecker@lewis-kappes.com jrompala@lewis-kappes.com

Respectfully submitted,

Jennifer A. Washbrun Jennifer A. Washburn

STATE OF INDIANA INDIANA UTILITY REGULATORY COMMISSION

REDACTED PETITION TO REOPEN THE EVIDENTIARY RECORD

Pursuant to 170 I.A.C. § 1-1.1-22, Citizens Action Coalition and Sierra Club (collectively, "Joint Intervenors") respectfully request that the Commission reopen the record in Cause No. 44794. This case arises from Indianapolis Power & Light Company's ("IPL") application to the Commission for certificates of public convenience and necessity ("CPCNs") to install and operate projects at its Petersburg Station to comply with both Clean Air Act National Ambient Air Quality Standards ("NAAQS") for sulfur dioxide and the Coal Combustion Residuals ("CCR" or "coal ash") rule. Since the Commission concluded hearings in this case in January 2017, there has been a change of fact that is material to the findings the Commission must make pursuant to Indiana Code § 8-1-8.4-6(b)(1)(A)-(E), (b)(2) (enumerating factors which

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the Commission must examine when considering an application for a CPCN for a "compliance project").

In particular, there has been a material change of fact that affects one of the key assumptions in the Company's economic analysis of the projects. The newly posted MISO capacity clearing price for 2017/2018 is dramatically lower than the capacity price assumption that IPL relied upon in its economic analysis. IPL assumed a

, however the results of MISO's recent 2017/2018 Planning Resource Auction yielded a capacity clearing price of only \$1.50/MW-day. *See* Joint Intervenors' Witness Schlissel's Affidavit, attached as <u>Exhibit 1</u>, and the MISO 2017/2018 Planning Resource Auction Results (Apr. 14, 2017), attached as <u>Exhibit 1</u>, Attachment 1.

The new evidence is material because it is directly relevant to three findings that the Commission must make in a CPCN proceeding, each of which relies on an economic analysis of the compliance projects. Specifically, whether the compliance projects are "reasonable and necessary," IC § 8-1-8.4-6(b)(1)(D), whether the compliance projects will "extend the useful life" of the Petersburg Station and how much the "value of that extension" is worth, IC § 8-1-8.4-6(b)(1)(E), and whether the projects constitute least-cost planning. *See In re Duke Energy Ind. Inc.*, Cause No. 43114, at 30 (I.U.R.C. Nov. 20, 2007) ("[L]east-cost planning is an essential component of our Certificate of Need law." (internal quotation marks omitted)).

I. FACTUAL BACKGROUND

On May 31, 2016, IPL filed a petition seeking CPCNs to install and operate projects at its Petersburg Station to comply with both the NAAQS for sulfur dioxide and the CCR rule. On November 30, 2016, IPL, together with the Indiana Office of the Utility Consumer Counselor ("OUCC") and the IPL Industrial Group ("IG"), filed a joint motion for leave to submit a

settlement agreement, which was granted. IPL and the OUCC subsequently filed testimony and attachments supporting the settlement agreement. The Commission convened an evidentiary hearing, which took place on January 18 and 26, 2017. Following the hearing, the parties filed post-hearing proposed orders and briefs. A Final Order in the matter is currently scheduled to issue on April 19, 2017. *See* Indiana Utility Regulatory Commission, Public Notice of IURC Conference Final Agenda (April 17, 2017), attached as Exhibit 2.

On April 14, 2017, the Midcontinent Independent System Operator ("MISO") released the results of its 2017/2018 Planning Resource Auction. The clearing price for capacity in Zone 6, which encompasses the region served by IPL's Petersburg Station, is \$1.50/MW-day. *See* MISO 2017/2018 Planning Resource Auction Results, at 2, 6, 8 (Apr. 14, 2017), attached as Exhibit 1, Attachment 1.

II. LEGAL STANDARD

170 I.A.C. § 1-1.1-22 authorizes the Commission to reopen the evidentiary record in response to a petition, which must set forth:

(1) Material changes of fact or law alleged to have occurred since the conclusion of the hearing.

(2) The reason or reasons such changes of fact or law could not have been reasonably foreseen by the moving party prior to the closing of the record.

(3) A statement of how such changes of fact or law purportedly would affect the outcome of the proceeding if received into evidence.

(4) A showing that such evidence will not be merely cumulative.

170 I.A.C. § 1-1.1-22(b)(1)-(4).

III. ARGUMENT

A. <u>A Material Change in the MISO Capacity Clearing Price Has Occurred</u> <u>Since the Hearing.</u>

There has been a material change of fact that affects one of the key assumptions in IPL's economic analysis of the proposed compliance projects. The newly released MISO capacity clearing price for 2017/2018 is dramatically lower than the capacity price assumption that IPL relied upon in its economic analysis. IPL assumed a **See** Affidavit of David A. Schlissel ("Schlissel Affidavit"), ¶ 5, attached as <u>Exhibit 1</u>. However, the results of MISO's recent 2017/2018 Planning Resource Auction show a capacity clearing price of only \$1.50/MW-day. *See* Exhibit 1, Attachment 1 at 2, 6, 8.

The discrepancy between MISO's actual capacity clearing price and IPL's capacity price assumptions represents a profound miscalculation on the part of IPL. Instead of

, as IPL predicted, the 2017/2018 capacity auction results declined 98 percent from the previous price of \$72/MW-day. *See* Exhibit 1, at ¶¶ 5-6. The drop in capacity prices can be explained by the inflow of new generating supplies combined with lower load forecasts. *Id.*, at ¶ 7. The new price of \$1.50/MW-day will be in effect through the May 31, 2018 end of MISO's Planning Year 2017/2018. *Id.*, at ¶ 6. Beyond that date, it remains "extremely unlikely, if not impossible" that capacity prices will reach the levels assumed by IPL. *Id.*, at ¶ 8.

By relying on high capacity price assumptions, IPL was able to produce an economic analysis that appeared to favor the proposed compliance projects. That economic analysis evaluated whether or not the proposed NAAQS and CCR compliance projects represented the least-cost option for complying with the applicable environmental requirements. One of the key inputs in that economic analysis is capacity price. By assuming high capacity prices, IPL was able to argue that the Petersburg units will operate at high capacity factors and generate

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substantial additional revenue. This optimistic outlook, IPL argued, favored retrofitting and continuing to operate the Petersburg units instead of retiring them. *See* JI Ex. 1 (Schlissel Direct), p. 3, lines 1-3, & p. 26, line 4 to p. 31, line 8; JI Ex. 1-S (Schlissel Settlement) p. 21, line 8 to p. 27, line 8. However, if IPL were to input *actual* capacity price into its economic analysis, in lieu of *assumed* capacity price, it is far from certain that the updated analysis would support the proposed compliance projects as the least cost option.

The new evidence is material because it is directly relevant to three findings that the Commission must make in a CPCN proceeding, each of which relies on an economic analysis of the compliance projects. First, whether the compliance projects are "reasonable and necessary," § 8-1-8.4-6(b)(1)(D). Second, whether the compliance projects will "extend the useful life" of the Petersburg Station and how much the "value of that extension" is worth, § 8-1-8.4-6(b)(1)(E). Third, whether the compliance projects constitute least-cost planning. *See In re Duke Energy Ind. Inc.*, Cause No. 43114, at 30 (I.U.R.C. Nov. 20, 2007) ("[L]east-cost planning is an essential component of our Certificate of Need law." (internal quotation marks omitted)).

B. <u>The Change in Fact Could Not Have Been Reasonably Foreseen by Joint</u> Intervenors Prior to the Close of the Record.

Joint Intervenors could not reasonably have foreseen this change in fact prior to the close of the record. To be sure, Joint Intervenors have maintained throughout these proceedings that IPL's capacity price assumptions were unreasonably high and that long-term, annual capacity prices in MISO "will continue to see-saw up and down." JI Ex. 1 (Schlissel Direct), p. 39, lines 9-12. But Joint Intervenors could not reasonably have foreseen with any degree of accuracy the dramatically low capacity clearing price of \$1.50/MW-day.

C. <u>The New Evidence Would Support the Finding That the Proposed</u> <u>Compliance Projects Are Not Economic.</u>

The NAAQS and CCR compliance projects are not economic under present market conditions. Previously, Joint Intervenors conducted their own economic analysis using capacity price assumptions lower than those used by IPL, but vastly higher than the newly posted capacity prices, and found that the NAAQS and CCR projects are not economic. JI Ex. 1-S (Schlissel Settlement), p. 22, line 3 to p. 27, line (capacity price assumption set to \$100/MW-day). If Joint Intervenors were to update their analysis using the newly posted price of \$1.50/MW-day, it would absolutely confirm that result.

IPL's high capacity price assumptions mistakenly tilted the economic analysis in favor of retrofitting and continuing to operate the Petersburg units instead of retiring them. By assuming high capacity prices, IPL was able to argue that the Petersburg units will operate at high capacity factors and generate substantial additional revenue. *See JI* Ex. 1 (Schlissel Direct), p. 3, lines 1-3, & p. 26, line 4 to p. 31, line 8; JI Ex. 1-S (Schlissel Settlement) p. 21, line 8 to p. 27, line 8. Those assumptions were unreasonable, as Joint Intervenors argued throughout this proceeding. Instead, it is reasonable to expect that long-term, annual capacity prices in MISO, including Zone 6, will "continue to see-saw up and down" JI Ex. 1 (Schlissel Direct), at p. 39, lines 9-12. Now, with the benefit of the newly posted capacity clearing price to confirm Joint Intervenors skepticism, IPL's argument is impossible to sustain. Under current market conditions, the economic analysis will show that Petersburg is unable to generation enough revenue to operate economically. Under these facts, the economics favor retirement—an alternative which IPL has thus far declined to analyze.

D. <u>The New Evidence Would Not Be Merely Cumulative.</u>

The new evidence would not be merely cumulative because it is the best information available and it contradicts information currently in the record. The new evidence replaces IPL's capacity price *assumptions* with *actual* capacity prices. Moreover, it directly contradicts those assumptions. *Compare*, <u>Exhibit 1</u>, <u>Attachment 1</u>, at 2, 6, 8 (MISO 2017/2018 capacity clearing price is \$1.50/MW-day) *with* <u>Exhibit 1</u>, at ¶ 5 (forecasting base capacity prices of

). Because IPL's capacity price assumptions are key to its economic analysis, reopening the record will ensure that the Commission is using the most current and accurate information as it evaluates the Company's CPCN application.

IV. CONCLUSION AND REQUEST FOR RELIEF

For the foregoing reasons, Joint Intervenors respectfully request that the Commission reopen the evidentiary record in this proceeding in order to admit evidence showing that the MISO 2017/2018 capacity clearing price is \$1.50/MW-day and allowing the parties the opportunity to discover the precise effect of this new information on IPL's economic analysis. The MISO 2017/2018 capacity clearing price contradicts, and would replace, a key assumption in IPL's economic analysis. An updated economic analysis is required so that the Commission may evaluate whether the proposed compliance projects are reasonable and necessary, the value of the extension of the useful life of Petersburg as a result of the compliance projects, and whether the projects constitute least-cost planning. Therefore, Joint Intervenors request that the Commission issue a scheduling order that: (1) provides parties with an opportunity to conduct discovery; (2) allows parties to submit pre-filed testimony; and (3) schedules an evidentiary hearing.

Dated: April 18, 2017

Respectfully submitted,

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Jennifer A. Washburn, Atty. No. 30462-49 Citizens Action Coalition, Inc. 603 East Washington Street, Suite 502 Indianapolis, Indiana 46204 Phone: (317) 735-7764 Facsimile: (317) 290-3700 jwashburn@citact.org

Thomas Cmar, Atty. No. 3491-95-TA Earthjustice 1101 Lake Street, Suite 405B Oak Park, IL 60301 Phone: (312) 257-9338 Facsimile: (212) 918-1556 tcmar@earthjustice.org

Benjamin Locke, Atty. No. 5773-95-TA Earthjustice 1617 John F. Kennedy Blvd., Suite 1130 Philadelphia, PA 19103 Phone: (215) 717-4528 Facsimile: (212) 918-1556 blocke@earthjustice.org

Counsel for Joint Intervenors

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail or U.S.

Mail, first class postage prepaid, this 18th day of April, 2017, to the following:

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

Robert K. Johnson 2454 Waldon Drive Greenwood, Indiana 46143 rjohnson@utilitylaw.us

Randall Helmen Lorraine Hitz-Bradley Indiana Office of Utility Consumer Counselor 115 W. Washington Street, Suite 1500 South Indianapolis, Indiana 46204 rhelmen@oucc.IN.gov lhitzbradley@oucc.IN.gov infomgt@oucc.IN.gov

Anne Becker Joseph Rompala Lewis & Kappes, P.C. One American Square, Ste. 2500 Indianapolis, Indiana 46282 abecker@lewis-kappes.com jrompala@lewis-kappes.com

Respectfully submitted,

Jennifer A. Washbrum Jennifer A. Washburn

EXHIBIT 1

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS)	
POWER & LIGHT COMPANY ("IPL"), AN)	
INDIANA CORPORATION, FOR (1)	
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THE USE OF CLEAN COAL TECHNOLOGY)	
PURSUANT TO IND. CODE CH. § 8-1-8.7	

AFFIDAVIT OF DAVID A. SCHLISSEL

- 1. My name is David A. Schlissel. I am the President of Schlissel Technical Consulting, Inc., 45 Horace Road, Belmont, MA 02478.
- I graduated from the Massachusetts Institute of Technology in 1968 with a Bachelor of Science Degree in Engineering. In 1969, I received a Master of Science Degree in Engineering from Stanford University. In 1973, I received a Law Degree from Stanford University. In addition, I studied nuclear engineering at the Massachusetts Institute of Technology during the years 1983-1986.
- 3. Since 1983 I have been retained by governmental bodies, publicly-owned utilities, and private organizations in 38 states to prepare expert testimony and analyses on engineering and economic issues related to electric utilities. My recent clients have included the U.S. Department of Justice, the Attorney General and the Governor of the State of New York, state consumer advocates, and national and local environmental organizations. I have filed expert testimony before state regulatory commissions in Arizona, New Jersey, California, Connecticut, Kansas, Texas, New Mexico, New York, Vermont, North Carolina, South Carolina, Maine, Illinois, Indiana, Ohio, Massachusetts, Missouri, Rhode Island, Wisconsin, Iowa, South Dakota, Georgia, Minnesota, Michigan, Florida, North Dakota, Mississippi, Maryland, Virginia, Arkansas, Louisiana, Colorado, New Mexico, Oregon and West Virginia and before an Atomic Safety & Licensing Board of the U.S.

Nuclear Regulatory Commission. A copy of my current resume was admitted into the record at the evidentiary hearing as JI Exhibit 1, Attachment DAS-1. Additional information about my work is available at <u>www.schlissel-technical.com</u>.

- 4. As a witness for Joint Intervenors in this proceeding, I testified that the Company relies in its economic modeling on forecasts that assume that natural gas, energy market, and capacity prices will all over the next years, behaving very differently in the future than they have in the recent past. I testified how IPL's forecasts are inconsistent with current market conditions, as reflected both by actual market prices in 2016 (which were lower than those incorporated in IPL's base case in this proceeding) and by forward markets, which project that current trends of low natural gas and energy market prices will likely persist for years into the future. Moreover, I discussed how IPL could and should have updated its forecasts prior to filing its case-inchief with spring 2016 data that more accurately reflects current market conditions, but it chose not to do so. As my testimony demonstrated, if IPL had used realistic assumptions in its modeling equivalent to those in the Company's own "low" gas price scenario, it would have been forced to conclude that the proposed projects are not a reasonable, necessary, or least-cost alternative. JI Ex. 1 (Schlissel Direct), p. 2, lines 23-24, & p. 4, line 3 to p. 24, line 12; JI Ex. 1-S (Schlissel Settlement), p. 1, lines 16-20, & p. 4, line 11 to p. 13, line 9; see also Tr. at B-60 to B-61.
- 5. In my direct testimony, I produced the following two graphs to demonstrate why IPL's forecast, showing that capacity market prices

, is unreasonable. The first graph shows IPL's assumed future MISO capacity prices, while the second shows the MISO Zone 6 capacity prices through the 2017/18:





JI Exhibit 1-Confidential, page 34.

- 6. On April 14, 2017, MISO, the regional transmission organization of which IPL is a participant, posted its latest Planning Year 2017/18 capacity auction results. Instead of climbing, as IPL had assumed, the results, at <u>\$1.50/MW-day</u>, represented a decline of 98 percent from the previous price of \$72/MW-day. *See* <u>Attachment 1</u>. This new price will be in effect through the May 31, 2018 end of MISO's Planning Year 2017/2018.
- 7. The following graph shows the results of MISO's last four capacity auctions for Zone 6 that covers Indiana.

IPL Confidential Workpaper JMS-1.



MISO's Last Four Capacity Auctions for Zone 6

- 8. Thus, instead of increasing as IPL had forecast, capacity prices in MISO Zone 6 have declined.
- 9. It has been noted that the lower capacity prices are largely reflective of new generating supplies and lower load forecasts. Increased demand-side resources and energy efficiency were offered in the auction, and cleared. There also were increases in renewable resources of both wind and solar that were offered in the auction.
- 10. Given the new \$1.50/MW-day capacity price for Planning Year 2017/2018, it is extremely unlikely, if not impossible, that capacity prices for the calendar year 2018, and beyond, will reach anywhere close to the levels assumed by IPL.
- 11. This new information from MISO further demonstrates that IPL unreasonably relied on high capacity prices in this proceeding, resulting in a proposal that is very risky and unlikely to produce benefits to ratepayers.
- 12. To summarize, the MISO Planning Year 2017/18 Capacity Results released on April 14, 2017, show that IPL seriously overstated the future capacity revenues that it will earn from the Petersburg plant and that, consequently, ratepayers are unlikely to benefit from the proposed Petersburg upgrades.

Source	\$/MW-day	
MISO 2017/18 Capacity Results released 4/14/17	\$1.50	
MISO Zone 6 2016/17 Capacity Results as of 10/4/16	\$72	
IPL Projected Capacity Prices for 2018 as of 5/31/16	\$	

- 13. Accordingly, it is my opinion that the Commission should reopen the record to consider the impact of the new MISO capacity prices as it would likely affect the outcome of the proceeding if received into the record.
- 14. I affirm, under the penalties of perjury, that the foregoing statements are based on personal knowledge and are true and correct to the best of my knowledge, information and belief

Further I say not.

Davil a. Scher

David A. Schlissel April 18, 2017

EXHIBIT 1, ATTACHMENT 1

April 14, 2017

2017/2018 Planning Resource Auction Results



MISO
MISO

4	Auction Inputs and Considerations
•	MISO's Resource Adequacy construct combines regional and local criteria to achieve a least-cost solution for the region subject to the following:
	 MISO-wide reserve margin requirements Zonal capacity requirements (Local Clearing Requirement)
	- Zonal transmission limitations (Capacity Import/Export Limits)
	 Sub-Regional contractual limitations such as between MISO's South and Central/North Regions
٠	The MISO-wide reserve margin requirement is shared among the Zones,
	and Zones may import capacity to meet this requirement
•	Multiple options exist for Load-Serving Entities to demonstrate Resource
	- Submit a Fixed Resource Adequacy Plan
	- Utilize bilateral contracts with another resource owner
	- Participate in the Planning Resource Auction
•	The Independent Market Monitor reviews the auction results for physical
	and economic withholding
	OSIM
*	

Auction Output and Settlements

- Key outputs from the Auction
- A commitment of capacity to the MISO region, including performance obligations and I
- The capacity price (Auction Clearing Price) for each Zone I
- This price drives the settlements process
- Load pays the Auction Clearing Price for the Zone in which it is physically located I
- Cleared capacity is paid the Auction Clearing Price for the Zone where it is physically located I
- External Resources are paid the price of the Zone where their firm transmission service crosses into MISO



U	 Changes since PRA 2016/2017 Tariff revisions approved in FERC Docket No. ER17-806-000 exempting Demand Resources (ER) from Market Monitoring and Mitigation in the 2017-18 PRA Resources (ER) from Market Monitoring and Mitigation in the 2017-18 PRA Participants approved in FERC Docket No. ER17-806-000 modified the application of the Physical Withholding Threshold to include Market Participants and their Affiliates Tariff revisions approved in FERC Docket No. ER17-806-000 modified the application of the Physical Withholding Threshold to include Market Participants and their Affiliates Tariff revisions approved in FERC Docket No. ER16-833-004 established default technology specific avoidable costs, in lieu of providing facility specific operating cost information, to request facility specific Reference Levels from the IMM Sub-Regional Export Constraint in the South to Midwest direction increased to a 3000 MW limit from 370 MW in the Midwest to South direction
) />	

2017/2018 Auction Clearing Price Overview



MISO Offer Curve, 2016/2017 vs. 2017/2018



Auction Clearing Prices Since 2014-15 PRA

\$/MW-day

MISO

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10
2014-2015 ACP*	\$3.29	\$16.75	\$16.75	\$16.75	\$16.75	\$16.75	\$16.75	\$16.44	\$16.44	N/A
2015-2016 ACP*	\$3.48	\$3.48	\$3.48	\$150.00	\$3.48	\$3.48	\$3.48	\$3.29	\$3.29	N/A
2016-2017 ACP*	\$19.72	\$72.00	\$72.00	\$72.00	\$72.00	\$72.00	\$72.00	\$2.99	\$2.99	\$2.99
2017-2018 ACP*	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50
Conduct Threshold	\$25.83	\$26.09	\$25.53	\$25.94	\$26.45	\$25.85	\$26.00	\$24.79	\$25.14	\$24.61
Cost of New Entry	\$258.32	\$260.90	\$255.31	\$259.42	\$264.52	\$258.49	\$260.00	\$247.94	\$251.42	\$246.13

- Current Conduct Threshold is 10% of Cost of New Entry (CONE) for each Zone
- Current Conduct Threshold is \$0 for a generator with a facility specific Reference Level

* Auction Clearing Price

2017/2018 Planning Resource Auction Results

Local Resource Zone	Z1	Z2	Z3	Z4	Z5	Z 6	Z7	Z 8	Z9	Z10	System
PRMR	18,316	13,366	9,781	9,894	8,598	18,422	22,295	8,329	20,850	4,902	134,753
Total Offer Submitted (Including FRAP)	19,635	15,149	11,009	10,618	7,950	18,718	22,031	10,914	20, <mark>39</mark> 2	5,732	142,146
FRAP	14,361	11,559	4,197	712	0	4,155	12,374	470	182	1,454	49,463
Self Scheduled	4,004	2,113	5,575	7,723	7,948	13,009	9,462	9,660	16,505	3,556	79,554
ZRC Offer Cleared	4,568	2,207	6,088	8,412	7,950	14,510	9,583	9,669	18,470	3,833	85,290
Total Committed (Offer Cleared + FRAP)	18,929	13,766	10,285	9,124	7,950	18,665	21,956	10,139	18,652	5,287	134,753
LCR	15,975	11,980	7,968	5,839	5,885	13,005	21,109	6,766	17,295	4,831	N/A
CIL	3,531	2,227	2,408	5,815	4,096	6,248	3,320	3,275	3,371	1, <mark>91</mark> 0	N/A
Import	0	0	0	771	648	0	338	0	2,198	0	3,955
CEL	686	2,290	1,772	11,756	2,379	3,191	2,519	2,493	2,373	1,747	N/A
Export	613	400	503	0	0	243	0	1,810	0	385	3,955
ACP (\$/MW-Day)	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	\$1.50	N/A

Additional Details Regarding Supply

Planning Resource Type	2017-2018 Offered	2016-2017 Offered	2017-2018 Cleared	2016-2017 Cleared
Generation	127,637	127,329	121,807	122,379
Behind the Meter Generation	3,678	3,487	3,456	3,462
Demand Resources	6,704	6,322	6,014	5,819
External Resources	4,029	4,385	3, <mark>3</mark> 78	3,823
Energy Efficiency	98	0	98	0
Total	142,146	141,523	134,753	135,483

- Demand Resource quantities include Aggregator of Retail Customers (ARCs) that registered for the 2017-18 PRA
- Registered Energy Efficiency Resources for the 2017-18 PRA for the first time since the 2013-14 PRA



Next Steps

- Detailed results review at May 10 Resource Adequacy Subcommittee (RASC)
- Posting of PRA offer data 30 days after PRA conclusion May 12



Acronyms

- ACP Auction Clearing Price (\$/MW-Day)
- ARC Aggregator of Retail Customers
- BTMG Behind the Meter Generator
- CEL Capacity Export Limit (MW)
- CIL Capacity Import Limit (MW)
- CONE Cost of New Entry
- FRAP Fixed Resource Adequacy Plan (MW)
- FSRL Facility Specific Reference Level (\$/MW-Day)
- LCR Local Clearing Requirement (MW)
- LMR Load Modifying Resource
- LRZ Local Resource Zone
- PRA Planning Resource Auction
- PRM Planning Reserve Margin (%)
- PRMR Planning Reserve Margin Requirement (MW)
- SREC Sub-Regional Export Constraint
- SRIC Sub-Regional Import Constraint
- ZRC Zonal Resource Credit

MISO

References

- Sub-Regional Export and Import Constraints discussed at the Resource Adequacy Subcommittee (RASC)
 - November 2, 2016
- Market Monitoring and Mitigation in the Planning Resource Auction
 - February 8, 2017



EXHIBIT 2

STATE of INDIANA

INDIANA UTILITY REGULATORY COMMISSION 101 WEST WASHINGTON STREET, SUITE 1500 EAST

INDIANAPOLIS, INDIANA 46204-3419



www.in.gov/iurc Office: (317) 232-2701 Facsimile: (317) 232-6758

PUBLIC NOTICE

April 17, 2017

The Indiana Utility Regulatory Commission will meet in Conference this coming <u>Wednesday</u>, <u>April 19, 2017 at 2:00 P.M. LOCAL TIME</u>, IURC Conference Center, Suite 220, PNC Center, Indianapolis, Indiana to discuss or vote on the matters attached.

Questions concerning this proceeding or any other matters pending before the Commission may be directed to Megan Wade-Taxter, Public Relations Manager, at (317) 233-4723.

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MARY M. BECERRA, SECRETARY OF THE COMMISSION INDIANA UTILITY REGULATORY COMMISSION

INDIANA UTILITY REGULATORY COMMISSION Final Agenda

Conference to be held Wednesday, 4/19/2017 at 2:00 PM LOCAL TIME, IURC Conference Center, Suite 220, PNC Center, 101 West Washington Street, Indianapolis, Indiana.

<u>Carol Sparks</u> Drake			
	37369 GCA 117	Boonville Natural Gas Corporation	Final Order
	38706 FAC 114	Northern Indiana Public Service Co.	Final Order
<u>Marya Jones</u>			
	44845	Xcel Energy Transmission Development Company, LLC	Dismissal Order
	44924 VSP 1	Skitter Cable TV, Inc.	Final Order
<u>Aaron Schmoll</u>	44733 TDSIC 1 S 1	Northern Indiana Public Service Co.	Final Order
Loraine Seyfried			
	44794	Indianapolis Power & Light Company	Final Order
	44913	Indiana Michigan Power Company	PHC Order

Technical Divisions may present utility articles for Commission approval.

The Pipeline Safety Division may present proposed findings of violation and Advisory Committee recommendations for Commission approval.

The Chief Administrative Law Judge may present an order authorizing Commissioners and Administrative Law Judges to conduct hearings and investigations in assigned cases.

The Commission may consider any pending appeals to the full Commission of rulings by presiding officers.

This agenda is current as of the time of issue; however, items may be added or deleted at the discretion of the Commission.