

2021 I&M IRP Website Stakeholder Comment Summary				
	Stakeholder	Topic	Comment	I&M Response
CAC and Earth Justice submitted comments on Friday, March 26, 2021 7:39 PM; for tracking purposes Day 1 of the 15 working day clock begins on MARCH 29TH. The comments are due on April 16.				
1.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Metrics/balanced scorecard	<p>the proposed metrics are too narrow, arbitrarily limited to the “balanced scorecard” framework, and do not always capture the variables they intend.</p> <p>The “balanced scorecard” framework is arbitrary for several reasons. First, because it is a table, the metrics that populate it have to be presented as a single value. This would result in CO2 emissions in a single year or in total, for example, being the single measure of “sustainability impact”. But the impact of CO2 emissions on climate change or as an economic risk to I&M and its customers is not the same in any given year. It would be far more informative to present a visualization of emissions for each simulated portfolio throughout the planning period. And the same is true for many of the other metrics, e.g. spot purchases and sales. We should be far more concerned with a proposal to sell large quantities of energy in the near-term than a portfolio that shows that happening in the late 2030s because the results that far out are far less certain than the near-term results. These important details cannot be shared in a scorecard framework. Using a scorecard prioritizes brevity of information over utility of information.</p>	<p>General Note: Please review the responses to these questions in total, as they will provide additional clarity for each individual question.</p> <p>The Balanced Scorecard provides many benefits to decision makers and consumers of the IRP analysis. A principle benefit of the Balanced Scorecard is that it can be used to communicate the balanced nature of the ultimate preferred portfolio. By displaying relevant metrics for sustainability, affordability and reliability, the Balanced Scorecard shows the manner in which these important portfolio attributes are balanced to best meet the needs of all of I&M’s stakeholders.</p> <p>The Company plans to use Time Series metrics in addition to those used in the Balanced Scorecard and will consider the weighting methodologies that could be used within these metrics to address short-term vs. long-term impacts.</p>
2.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Scorecard Color Coding	<p>Second, the scorecard is arbitrary because of the color coding.¹ During the IRP workshop, Siemens and I&M both stated that the color coding is intended to make the scorecard easier to digest, but this is exactly the problem with color coding. Rather than allowing the reader to draw his/her own conclusions about the metrics, the color coding is effectively telling the reader which portfolio is preferable. We have observed in prior Siemens scorecards that the red, green, and yellow coding is sometimes assigned based on trivial differences, for example. So the color coding is not providing neutral guidance about what is important, rather it is a product of the totally subjective color coding that Siemens and I&M choose.</p>	<p>As with most visualization methods, colors provide another method of consumption for the information presented but it doesn’t prevent readers from drawing their own conclusions.</p> <p>I&M continues to promote broad and diverse access to its publically available information. We will include in the report, the opportunity for those with disabilities to receive an alternative format.</p>

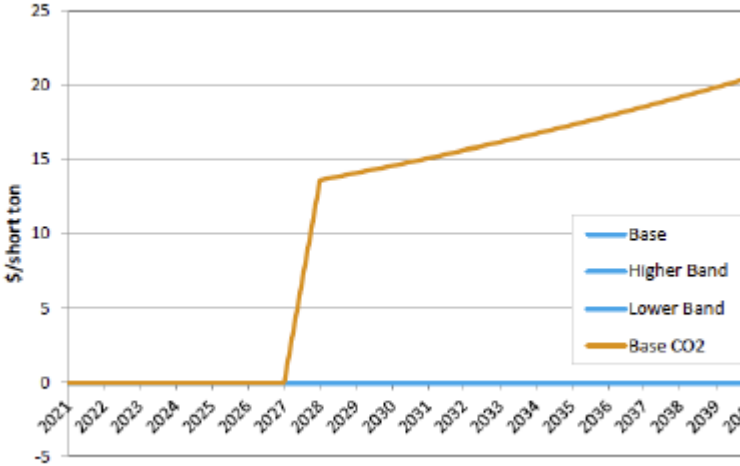
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			<i>1 It is also important to note that a color-coded scorecard does not communicate anything additional to those who are color blind.</i>	
3.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Metrics	Finally, the metrics proposed do not necessarily capture the concern they purport to. Rate stability is much more of a near-term concern in the sense that cost and rate impacts are more known in the near term. Testing portfolios stochastically and particularly in the manner proposed by Siemens, does not differentiate between near and long-term concerns. Nor do we think this methodology is actually representing revenue requirements. It is our understanding that Aurora is incapable of calculating revenue requirements, all capital costs are represented as a carrying charge (levelized charge) rather than as assets with depreciation schedules, which can have a very different rate impact. We also do not believe measuring reserve margin captures reliability concerns, all portfolios will have to meet that constraint. It would be much more informative to measure how resilient the system would be to a major contingency like a long-duration generation outage and/or to think about other points of weakness such as reliance on a single gas pipeline. Lastly, we do not believe “mix of adequate resources” is a good measure of Resource Diversity. Where fuel supply is not at issue, diversity by resource type has little meaning. A better indicator would be number of unique generators relied upon.	As part of our continuous improvement in IRP’s, new metrics are being considered to which, many different attributes could be considered as part of the evaluation. The Company will continue to consider additional metrics associated with this IRP throughout the process to support the stated objectives. Detailed production cost modeling issues will be addressed in more context during the Aurora Technical Conference scheduled to occur in late May.
4.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Metrics/Score card	Our top-level recommendation as it relates to metrics would be to skip the scorecard altogether and talk about each metric qualitatively supplemented with quantitative data that captures the objective of the metric. For example, a discussion of off-system sales and purchases in each portfolio with a chart showing how those change over time. It is much more informative, though no more subjective for I&M to then discuss how it balances these data into the selection of a preferred plan rather than simply color coding the “winning” portfolio.	See response to item 1 pertaining to the use of a scorecard. However, for metrics that change over the planning period, the Company is considering supplemental analysis methods to inform the relative value between portfolios.
5.	Citizens Action Coalition of Indiana (“CAC”)		As it relates to a diversity, equity and inclusion (“DE&I”) metric, because this metric should be reflective of the preferences of affected communities, it makes the most sense to solicit the feedback of those communities. Since those preferences may vary amongst different	Good feedback regarding our impact on communities. We are committed to working with the communities in which we work, live and locate resources. We have a team of

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and Earthjustice		<p>service territories, we would propose the following as interim metrics. First, a metric that measures whether emitting units in each portfolio are located in low-income and/or communities of color. An example of this as it relates to peaker plants in New Mexico is given below. See comment package for example) .</p> <div data-bbox="682 609 1344 1356" data-label="Figure"> <p>Demographics Near New Mexico Peakers</p> <p>Population (in selected radius)</p> <ul style="list-style-type: none"> 1,000 20,000 40,000 60,230 </div>	<p>external affairs representatives that engage customers, officials, and community leaders and organizations to understand their interests and concerns and to help them understand our goals and objectives in meeting their needs. For this IRP, we also value the feedback we receive through the stakeholder process and are pleased that it is a diverse group of interests that includes communities we serve, customer groups and individual customers. We are also aware of the demographics of the communities in which we have existing resources and can discuss those as appropriate. The location of new resources is generally not known or specified when developing an IRP and the impact on communities of new resources may be better discussed as part of the review of a specific resource action. For more information regarding I&M's and AEP's commitment to a Just Transition within the communities we serve, please reference our recently issued Climate Impact Analysis.</p> <p>http://www.aepsustainability.com/performance/report/docs/AEPs-Climate-Impact-Analysis.pdf</p>	
		<p>The circle size indicates the population within a given radius of the plant and the color, in this case, distinguishes between peakers at their own</p>		

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			<p>site versus those co-located with a combined cycle plant. We would also note that this is another example of useful information that cannot easily be included in a scorecard. For I&M’s purposes, we would recommend keeping the low-income and community of color axes, but changing the color coding to reflect the fuel burned at emitting units. We would note that a similar graph, but for all fuel types, could be used to identify some of the positive and negative impacts as well as the equity of those impacts of replacement generation once those locations are identified.</p>	
6.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	metrics	<p>We would also propose a second DE&I metric that attempts to capture the potential for benefits of new resources (both supply and demand-side) to low-income and communities of color in I&M’s service territory by quantifying the total investment that has potential to be located in these communities. That investment could include dollars spent on energy efficiency, dollars spent on solar, etc. This is a metric that will need future refinement, but should be accompanied by consideration of programs that will directly address the objective of the metric. Ideally, I&M would also be evaluating programs that directly impact affected communities as part of its IRP, e.g., low-income community solar, low-income electric vehicle incentives, investment in “green zones” in communities located near I&M’s power plants, etc. 3</p> <p><i>3 Clearly, there is an implementation component to this that is important and complementary. And that is to weigh where to invest those dollars also using these metrics (and other metrics) once I&M moves from the generic resources modeled in the IRP to the specific resources it would seek to implement. At that stage, I&M could also supplement this analysis by considering whether historic investment has gone equitably towards affected communities.</i></p>	<p>We appreciate this feedback and input. DE&I considerations are very important to our business goals and objectives. The IRP process typically is focused on a more macro resource plan level, however, consideration will be given to programs similar to what is described in the feedback. For example, IRP modeling could specifically capture some of the factors mentioned as they would be location and situation specific. That said, renewables and demand-side resources will continue to be key elements of the IRP and</p> <p>I&M will be incorporating DE&I considerations into future resource decisions and new customer programs. As an example, I&M recently proposed and received Commission approval of new programs in Michigan that expand opportunities for low-income and customers without broadband access to customize their electric service and manage their electric bill. I&M plans to seek approval of similar programs in Indiana. Also, see response to 5.</p>

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7	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Scenarios	<p>We believe the carbon reduction goal for Net Zero by 2050 should be at least a 95% reduction from a baseline year. Because we would have to transition so many end-uses to electricity to meet an economy wide climate goal, there will be extremely limited options to offset electric sector GHG emissions, and the modeled goal should reflect that reality.</p> <p><i>4. A common baseline year is 2005, but we recognize that AEP’s corporate goal is relative to a year 2000 baseline.</i></p>	The Company agrees that a substantial reduction is necessary and is consistent with its recently released Climate Impact Analysis report.
8	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Scenarios	<p>Furthermore, because a plan to achieve this goal would most reasonably result in system emissions reductions over time, it will likely make sense to model one or more interim goals. An annual constraint is probably overly limiting, but a 2030 goal could be reasonable. AEP’s corporate goal of an 80% reduction from 2000 emissions by 2030, as applied to I&M’s system, may be a good choice though it’s unclear if this would be achieved by already contemplated reductions such as the retirement of Rockport. And because this magnitude of decarbonization will have to happen system-wide, we recommend two scenarios that include this goal: one with I&M’s base case load forecast as proposed, and the other reflecting I&M’s best estimate of the load impacts of large scale electrification (likely more electrification than would be reflected in the “market electrification” scenario).</p>	The Company expects the final IRP scenarios will address a variety of alternative futures including increased ambitions around climate and scenarios around higher electrification. Further analysis related to the suggested additional high electrification scenario will be considered and reviewed through the stochastics analysis.
9.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Scenarios	<p>We also concur with Emily Medine’s recommendation that gas assets should be modeled as fully depreciated, ideally by 2040, in at least this scenario. Finally, we note that in evaluating and modeling resource options, I&M should factor in the lifecycle GHG impacts of each option, rather than considering only the CO2 directly emitted by the resource. This is especially important with regards to gas-fired resources given the significant GHG impacts from the extraction and transport of natural gas.</p>	<p>The Company does not plan to modify the asset lives of its non-CCS fossil resources due to the expectation of the availability of low carbon fuels. Furthermore, the Company may constrain energy production from non-CCS fossil resources to support a “Net Zero by 2050” objective.</p> <p>The Company plans to review GHG impacts from the resource perspective and the lifecycle perspective.</p>

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10.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Scenarios	<p>We understand that I&M wishes to keep its scenarios to a manageable number, so we would recommend the following:</p> <table border="1" data-bbox="592 508 1215 673"> <tr> <td>Reference</td> </tr> <tr> <td>Net Zero by 2050</td> </tr> <tr> <td>Net Zero by 2050 with Electrification</td> </tr> <tr> <td>Rapid Technology Advancement</td> </tr> </table>	Reference	Net Zero by 2050	Net Zero by 2050 with Electrification	Rapid Technology Advancement	We appreciate the suggestion for a reduced number of scenarios and are considering the final set of scenarios and their inputs based on all the Stakeholder feedback. The Company intends to make adjustments to the proposed scenarios discussed in the Stakeholder Meeting #1 and will share these during Stakeholder Meeting #3.
Reference								
Net Zero by 2050								
Net Zero by 2050 with Electrification								
Rapid Technology Advancement								
11.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Scenarios	We are uncertain about the value of the Market Electrification scenario. I&M’s stakeholder presentation implied that High Load is merely reflective of more optimistic economic assumptions, which would not necessarily be reflective of electrification because the shape of load may not reflect the realities of electrification. If that is the case, we think high load is better reflected as a sensitivity than a scenario.	See response to 10.				
12.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Scenarios	We are also uncertain about the value of the Enhanced Regulation Case. Slide 48, pasted below, does not include the High CO2 price, so it is not clear what I&M would model.5 Indeed, this graph raises the question of whether “Base” CO2 means no CO2 price at all, which would raise other concerns about the remaining scenarios.	The Chart shown illustrates only the Base CO2 price in the current fundamentals of \$15/metric ton starting in 2028. The Enhanced Regulation case assumes a higher CO2 burden, as noted in slide 37 of the presentation. The charts will be updated as the Company continues through the process				

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			<p style="text-align: center;">CO2 Prices (Nominal \$/short ton)</p>  <p>5. We note that AEP’s Climate Impact Analysis has a “Fast Transition” CO2 price of \$30 per ton escalating at 3.5% per year, but it’s not clear if this is what AEP intends as the High value. http://www.aepsustainability.com/performance/report/docs/AEPs-Climate-Impact-Analysis.pdf</p>	
13.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Capital Cost Curves and Stochastics	As we stated during the IRP workshop, we do not believe it is appropriate to test capital costs stochastically. Capital costs, particularly those for renewables and battery storage, do not increase in one year, then decrease in the next, and then increase in the subsequent year, a situation that is entirely possible with the probability bands given. Renewable and battery storage capital costs are uncertain, but their overall trend is downward, a dynamic that makes scenario analysis the more appropriate way to examine their uncertainty.	While it may be correct that capital cost recovery for existing units does not vary from year-to-year, this is not the case for overnight costs or financing costs that are applicable for new units in Siemens PTI’s analysis. Perhaps more importantly, capital cost uncertainty is not typically applied to candidate portfolios. Capital cost uncertainty is most frequently applied to the dynamic build logic that is used to add or retire capacity in neighboring energy

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				market areas in response to varying supply-demand conditions across the stochastic simulations. This is necessary to ensure that the simulated inter-tied areas maintain a reasonable supply-demand balance while capturing the uncertainty regarding the technologies that neighboring regions might add.
14.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Resource cost estimates	The proposed solar, wind, and storage costs appear to be roughly similar to National Renewable Energy Laboratory’s Annual Technology Baseline (NREL ATB), which is often used to characterize generic pricing of these resources. However, we’ve found that the NREL ATB often overstates storage costs in particular. A possible solution to this may be to use I&M’s RFP responses rather than Siemens’ capital cost curve (similar to the approach that Vectren and Siemens used in preparing Vectren’s 2019 IRP), and then apply the ATB’s cost curves going forward	The capital costs depicted in the initial slide deck were still in development. The Siemens team will be incorporating the results of I&M’s RFP responses.
15.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Load Forecast	<p>The presentation of I&M’s load forecasts raised several questions. First, it is not clear why the extreme weather forecast would have the same compound average growth rate (“CAGR”) as the Base forecast. If the extreme weather forecast is intended to account for significant climate impacts, it would seem likely that both the air conditioning loads and line losses would grow significantly. We also are not clear why the loss of wholesale customers in approximately 2034 would have such an outsized impact on the CAGR calculated over the entire period from 2020 – 2035.</p> <p>Finally, we renew our request that I&M not use “degradation” to adjust incentivized energy efficiency either in its load forecast or in the modeling of energy efficiency. This is a critical issue to the accurate modeling of energy efficiency in the IRP.</p>	<p>The extreme weather scenario had a neutralizing impact on overall load growth. In other words, the higher loads it created during the summer months (due to warmer temperatures) was offset by the lower heating loads during the winter (also caused by warmer temperatures).</p> <p>The load impact of wholesale contracts ending in 2034 has a significant impact on the compound average growth rates computed for the period between 2020-2035. You could exclude the wholesale load from the comparison, but it would no longer represent I&M’s projected load growth.</p> <p>The Company is committed to accurately modeling the impact of energy efficiency in the IRP and is actively working with our Market Potential Study (MPS) Consultant, GDS, to ensure these resources are included appropriately.</p>

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16.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Stakeholder Engagement –define limits of renewables that will be modeled	We would also request that I&M work with stakeholders to define the limits on renewables that it will model consistent with Section 6(d) of the settlement regarding I&M’s 2019 IRP that was filed with the Michigan Public Service Commission, which states, “I&M will work with stakeholders to define the modeling inputs for the IRP, including scenarios for [...] renewable generation resources”.	The Company has invited all Stakeholders to be part of the process that includes an open and transparent discussion on modeling inputs and scenarios.
17.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Stakeholder Engagement – Rockport 1 5/31/25 scenario	Pursuant to Section 6(c) of the Michigan settlement, we urge I&M to work with stakeholders in establishing the inputs to be used in modeling a scenario that includes a May 31, 2025 retirement of Rockport Unit 1.	See response to item 16
18.	Citizens Action Coalition of Indiana (“CAC”) and Earthjustice	Stakeholder Engagement – OVEC	We also urge I&M to include on the agenda for the next stakeholder meeting discussion of the approach to evaluating the costs to customers of the Inter Company Power Agreement and the economics of terminating the operation of the OVEC units under the ICPA by the end of 2030, as required by Section 10(k) and 12 of the Michigan settlement.	As discussed in I&M’s first stakeholder meeting, I&M has a contractual obligation to purchase power from OVEC until 2040. The OVEC purchase is part of I&M’s diversified resource portfolio and will be modeled as a going-in resource consistent with the term of the agreement and other I&M resources that are owned or under long-term purchase agreements. Given this, Section 10(k) and 12 of the referenced settlement agreement were specifically written to provide supplemental information and testimony that I&M will prepare and file in support of I&M’s Preferred Plan as part of its next Michigan IRP filing.
Posted Q1-Q18 on April 16, 2021				
19.	Jennifer A. Washburn, Counsel Citizens Action Coalition of Indiana, Inc. 4/7/21	Request Stakeholder Presentation at Meeting #2	<p>Could we please do a stakeholder presentation at the April I&M IRP meeting next week?</p> <p>Follow up: Thanks for the confirmation. We’ll work to get you a presentation as soon as we can but we are unlikely to be able to meet the COB on Friday deadline. We’ll be in touch.</p> <p>Follow-up on 4/12/21 : Here is our stakeholder presentation for Wednesday. Thanks!</p>	<p>Jennifer, thank you for the note. Interested stakeholders will have an opportunity to speak at the April 14th meeting. To ensure we are able to balance the amount of materials to be covered and allow multiple interested parties an opportunity to speak, I&M is making the following arrangements:</p> <ul style="list-style-type: none"> • 30 minutes will be allotted for stakeholder presentations/comments

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				<ul style="list-style-type: none"> • Each presenter is asked to limit their presentation/comments to 15 minutes • Any presentation to be used during the stakeholder comments will need to be presented to I&M by COB this Friday, April 9, 2021 <p>Presentation was provided on 4/12/21. Anna Sommer presented Modeling EE in I&M's IRP at stakeholder meeting #2.</p>
20.	Gould, Karen (LARA) 4/15/21	GDS MPS	One other question, could you follow up with the question I think Dan posed to have GDS benchmark your average incentive as a % of incremental cost compared to other areas? I&M's numbers were fairly low which could be a great indicator why you've been unable to achieve the levels of other utilities in MI. Other utilities in Michigan are usually around 50 and can go as high as 100% (even for non-low income programs such as hard-to-reach commercial customers).	<p>I&M has tasked GDS with recommending industry best practice measures and programs as part of the MPS deliverables. Part of the expected work product from GDS is to benchmark incremental costs for each EWR measure and recommend incentive pricing levels that are economic so that I&M can be aligned with industry best practice but analyzed under I&M's specific avoided costs.</p> <p>From GDS' MPS work product, I&M plans to implement EWR programs consistent with IRP selection and GDS' recommended program delivery models and pricing structures.</p> <p>Internally only, Dan Mellinger already commented on the call yesterday and then back stepped, that I&M's rebates were either at or near 100% of IMC. These rebate levels are still what's implemented in I&M Michigan in our 2020 and 2021 programs.</p>
21.	Jennifer Washburn 4/14/21	Aurora Workshop	<p>Just a note per Jay's request to let you know that my colleagues cc-ed here and I are interested in attending the late May Aurora technical workshop. (cc: Kerwin Olson, Reagan Kurtz, Anna Sommer, Chelsea Hotaling, Sameer Doshi).</p> <p>4/15/21 follow-up: Our IRP expert, Anna Sommer, will be out May 10-28. Is there any way we can do a one off meeting with I&M to cover this</p>	<p>Thank you for confirming your interest in this technical workshop. We are currently in the process of finalizing details associated with this and plan on providing more information to stakeholders in the near future. Ultimately, we plan on providing access to the model in June and holding the workshop at a later date that better aligns with when we expect to have more of the modeling input data</p>

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			Aurora subject matter, assuming the meeting may be scheduled when she is out? If so, perhaps sometime during the week of May 3rd?	available. Our goal is to make the workshop a meaningful opportunity for our stakeholders.
22.	Wesley Rice-Snow April 14, 2021	Rockport	Hello; my home town of Muncie has experienced the many gifts that investing in solar power gives. When I volunteered to film an informative video about the local Unitarian Universalist church’s solar installation, I talked with the many congregation members proud of their contribution to fighting climate change. I also saw first-hand the well-paying and meaningful jobs the process provided to a town where most factory jobs have disappeared. As the disastrous weather effects of climate change shake our country, I worry that renewable energy will not be implemented swiftly enough by I&M. I also think about the many low-income communities who would benefit greatly from solar initiatives. I ask if I&M will commit to not buying power from Rockport Unit 2 when the current lease ends. I also ask if I&M will commit to quickly implementing solar power, including in Muncie.	I&M would like IRP stakeholders to be aware of the plans announced by AEP on April 22, 2021 to add more than 16,500 MWs of renewable energy across AEP’s service area by 2030 (see below). I&M intends to engage stakeholders in the current IRP process to assist in the evaluation of the plan for I&M. AEP also announced that I&M and AEP Generating Company have agreed to acquire Rockport Unit 2 as a capacity resource to help bridge I&M’s capacity needs as I&M continues its orderly transition to more renewable resources. I&M expects the inclusion of Rockport 2 in I&M’s generation portfolio used to serve customers will be reviewed with state commissions and stakeholders in filings before the commissions and as part of the IRP process. The Rockport 2 agreement was reached after I&M decided to not renew the lease and began confidential discussions with the owners about how the unit would be operated after the lease ended. As those discussions progressed, I&M recognized that it would be beneficial to all concerned if I&M controlled the unit after the lease expired. The generation changes at AEP will help grow renewable generation to 51 percent of AEP’s total capacity by 2030, as the company works to achieve its goal of net zero carbon emissions by 2050. Please refer to I&M’s IRP webpage for additional information.
23.	Anna Sommer – Energy Futures Group April 14, 2021 8:26 PM; 4/15/21 for	G, T, and D modeling	I also wanted to follow up with my question for Bob and Carlos. We were part of a team that recently wrapped up a study looking at meeting up to 75% of Puerto Rico’s energy needs from rooftop solar and battery storage. For that work our team did nodal simulations in Plexos, grid stability analysis in PSS/E, and distribution modeling using OpenDSS. So	In response to the first comment related to the frequency of performing G, T and D planning together, we would agree that it can be highly iterative and complex, and therefore requires a tenor reflective of the nature of the work involved. What will be important is that all three

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	business purposes		<p>we can directly relate to the challenge of aligning these functions across different platforms that you were all describing.</p> <p>I had two big takeaways from that work that I think apply to the discussion today. First, it's really not tractable to perform G, T, and D modeling together with a lot of frequency. There is so much iteration that takes a lot of time. Second, we saw some counterintuitive results in our study, particularly as it relates to the distribution system. A relatively modest number of mitigations were needed on the distribution system to achieve 75% solar/storage penetration. This was in part because those systems were spread out across lines rather than concentrated. And so I wonder if what I&M might aim for, likely in the next IRP, is to bookend a heavy buildout of DERs throughout its distribution system but particularly on all lines that are or are likely to become overloaded? It seems like the main way we can get distribution planning results to interface with generation planning (for the moment) is if we can better evaluate and isolate the deferral benefit of DERs. And I worry that doing this on a piecemeal basis as is typically done in non-wires alternatives analysis leaves much to be desired in terms of optimizing the total value of DERs. I realize that is a super conceptual suggestion, but it also seems like having an analytical goal to aim for is the only way to start doing this work and figure out how to align these planning processes. So I'd be interested to hear what Bob and Carlos think about that?</p>	<p>processes have the same set of goals and objectives. Establishing this up front will influence what happens in each of the planning processes. The conceptual example described in the question highlights this need for a common set of goals and objectives. When the non-wires alternatives analysis is approached from the perspective of distribution planning, it is done with the objective to resolve an emerging need on the distribution system more so than trying to address a more holistic concern that might involve G and T. If the perspective is changed to where the need is more broadly defined to include G and T requirements, then the analysis, solutions and economics all begin to look very different. This is the perspective the newly formed Grid Solutions organization is expected to bring to our planning efforts going forward – a holistic view of our customers' and/or system's needs and an array of solutions to best address those needs.</p> <p>Relative to the specific analytics being described in the question, there are likely steps we could take in the short-term. For example, distribution station transformers or feeder exits out of substations may be an area where we could focus our initial efforts. We would need to spend some time working out criteria, assumptions, assessment of benefits and costs and process details that don't exist today. For example, developing a set of assumptions around the type/sizing/performance expectations of the DERs would be extremely important. In addition, our planning criteria will need to be enhanced to be more inclusive of the types of solutions we would deploy and when and how we would deploy them. There are other</p>

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				<p>challenges we would need to address, especially if we want to take this type of analysis to the broader reaches of the distribution system, including more detailed load forecasting, enhanced information technology to drive process efficiencies given the potential volume of work, and the new tools and analytics required to develop solutions.</p> <p>All that said, this is a great aspirational goal to put in front of us and we agree that having the goal is a necessary requirement if we ever hope to get there.</p>
24.	Jennifer A. Washburn, Counsel Citizens Action Coalition of Indiana, Inc. April 29, 2021	Aurora Meeting	<p>Just touching base about our email below re: the Aurora meeting.</p> <p>“My pleasure. Our IRP expert, Anna Sommer, will be out May 10-28. Is there any way we can do a one off meeting with I&M to cover this Aurora subject matter, assuming the meeting may be scheduled when she is out? If so, perhaps sometime during the week of May 3rd? “</p>	See response to Q 21.
25.	Jennifer A. Washburn, Counsel Citizens Action Coalition of Indiana, Inc. April 29, 2021	RFP	When will I&M be releasing the RFP and sharing that with the I&M IRP listserv?	<p>I&M issued an All Source Informational Request for Proposal (RFP) on April 23, 2021. Additional information is available at:</p> <p>All-Source Informational RFP (indianamichiganpower.com)</p>