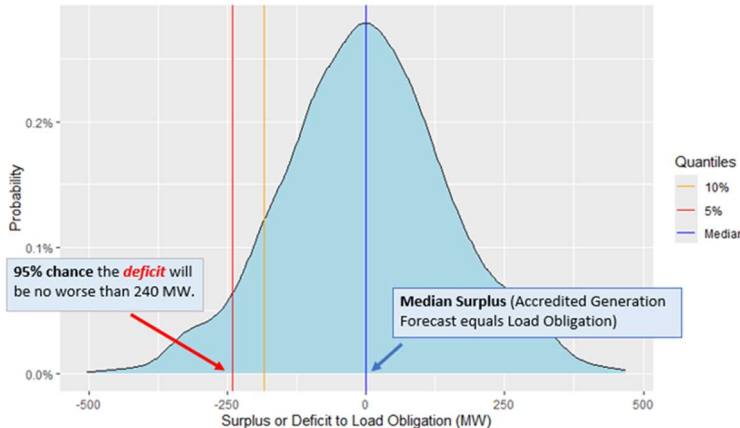


2024 Indiana IRP Stakeholder Comment Summary

	Stakeholder	Topic	Comment	I&M Response
CAC, Earthjustice, Vote Solar, and Solar United Neighbors submitted comments on Wednesday, October 2, 2024				
1.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Reserve Margin Obligation Contingency	One of the items discussed during the September 9th meeting was the inclusion of a 5% contingency for the reserve margin obligation, which translated to about 450 MW of additional capacity. Since this is a new concept that I&M is incorporating into the IRP and not one that we have seen used by other utilities, it would be helpful if I&M shared any supporting analyses that were undertaken to develop the 5% contingency. We also ask that I&M show how much of this contingency was assigned to each of the various factors it described during the September 9th and 24th meetings, such as potential changes in accreditation.	<p>It is prudent to plan above the minimum reserve margin obligation to address risks associated with load requirements and capacity accreditation that are largely outside the utilities control. This is particularly important given that I&M is moving from an extended period of having surplus capacity relative to PJM's requirements to the position of needed to add significant new resources to meet PJM's requirements.</p> <p>There are many factors that lead to uncertainty in the peak load forecast and the other factors driving uncertainty in the amount of generating capacity that I&M will have accredited in any future planning year. Together, these factors contribute to meaningful risk that the Company's accredited capacity will not meet its load obligation if it is not exceeded. For Indiana, I&M's analysis supports that to have 90% to 95% confidence that the Company will meet its load obligation in a future planning year, it will be necessary to add approximately 5% to the PJM-forecasted load obligation, depending on the types of resources in our portfolio and how distant is the planning year. There is the potential for significant financial risk if I&M is unable to meet its capacity obligation. If deficient, PJM will either a) remove the company from participating in the FRR option (initial demonstration is short) or b) impose a capacity deficiency charge (short within the planning year). For reference, the capacity deficiency charge for planning year 2025/2026 is \$452/MW-day. The following graph illustrates an example of the distribution of the demand surplus or deficit compared to the reserve margin obligation for a planning year, if the median accredited capacity equals the reserve margin obligation based on the current load forecast.</p>

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				 <p>If I&M targets a surplus equal to zero, then there would be only 50% confidence (1 out of every 2 years) that the Company will have sufficient capacity. I&M aims for 90% to 95% confidence. In this illustration, the Company would need to target another 200 MW capacity to achieve 90% confidence and 240 MW to achieve 95% confidence. In addition to this response, I&M plans to include a section in its IRP filing that will further detail this analysis.</p>
2.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Load Forecast	During the technical stakeholder meeting, we requested to receive access to the supporting information used to develop the load forecast that will be modeled in the IRP, in particular related to loads from new customers. Since the load forecast and assumptions around load growth from new customers will be an important driver of resource decisions in this IRP, we request that I&M provide supporting workbooks with stakeholders. Information that would be beneficial for stakeholders to review include MW additions for new customers, any applicable ramp rates, the customer category (i.e. data center, hydrogen production, manufacturing, etc.), and the 8,760	<p>I&M provided the following data directly to its IRP technical stakeholders who have executed a non-disclosure agreement (NDA).</p> <ul style="list-style-type: none"> - 2024 Indiana Load Additions: This included the year and month of the addition, the customer class, the facility type, the MW and MWh additions, and the associated load factor. - Indiana Large Load Shapes: This included the 8760 shape for all new customers.

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			shape. In addition, if I&M is using a process to forecast additional levels of new customer additions above what is already known to them, that would also be beneficial to share with stakeholders.	
3.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Bonus Investment Tax Credit	<p>Another topic discussed during the September meeting was assumptions for supply side resources. During the meeting, we recommended that I&M include the 10% additional energy communities bonus tax credit in its modeling. It is our understanding that I&M's position is that the energy communities bonus credit is only important for evaluating the merits of resources responding to I&M's RFP. While we agree that it will be important for evaluation of resources in an RFP, we disagree that it does not hold value for IRP modeling and resource selection. Including this tax credit adder could materially impact the type of supply-side capacity additions selected by the model, as it will affect the relative cost-competitiveness of different capacity options. For its 2024 IRP, Duke Energy Indiana is including assumptions around the energy communities bonus credit for wind, solar, and battery storage resources.¹ We appreciate that I&M has reconsidered its position will include some level of solar resource that is eligible the energy communities bonus credit but we do not yet know what that amount is and whether it is additional to the UPV I&M currently plans to model.</p> <p>¹ Duke Energy Indiana 2024 Integrated Resource Plan Public Stakeholder Meeting 1 Presentation, Slide 43. Retrieved from https://www.duke-energy.com/-/media/pdfs/for-your-home/dei-irp/20240222-dei-irp-public-meeting-1-slides.pdf?rev=c4b04eb66fdf4ba7a6f775eb38cc8778</p>	I&M has taken this feedback into consideration and is modeling a subset of our solar resources that will have capital costs with deductions to reflect the energy community tax credit bonus in addition to the Investment Tax Credit (ITC). Please reference the response to question 27 in the Stakeholder Meeting 2 Meeting Minutes.

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	Stakeholder	Topic	Comment	I&M Response
4.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	IRA Tax Credits	<p>I&M plans to assume that the PTC and ITC will reach 75% of their current value in 2037, 50% in 2038, and 0% in 2039. Based on a commencement-of-construction safe harbor assumption,² it appears that the underlying premise of this assumption is that nationwide total electric generation greenhouse gas (“GHG”) emissions will be reduced by 75% from 2022 levels in 2032.³ Given the enormous quantities of new load that I&M and many other electric utilities across the country are planning to add, we are extremely skeptical that this nationwide goal is likely to be achieved by 2032. We recommend that I&M instead assume that the federal tax credits are available at current value through the end of the planning period (based on a more likely assumption that nationwide electric sector GHG emissions will not reach 25% of 2022 levels until 2040, which, per statute, would push back the federal tax credit phaseouts accordingly). As a check on this, I&M may want to benchmark its own emissions in 2032 under the simulations it is presumably currently running compared to its 2022 levels. In its last IRP, the Preferred Portfolio did result in a reduction in direct emissions from 2022 levels of about 75%. However, that included the removal of Rockport 2 from I&M’s portfolio in 2024, retirement of Rockport 1 in 2028, and no additions of gas capacity through 2032 other than 1,000 MW of peakers. Since I&M plans to add approximately 4,400 MW of new data center load during this time and its proposed renewable and battery storage build limits would prevent its model from selecting adequate quantities of clean energy resources to meet this drastic load increase in that time period,</p>	<p>I&M’s modeling is utilizing the most up to date information provided in the Internal Revenue Code, which references that the PTC and ITC can begin to phase out beginning in 2032 if the nationwide goal is met. I&M will keep its current assumption of the IRA Tax Credits for modeling all scenarios and sensitivities. The Company will include the stakeholder requested assumption around tax credit availability throughout the planning period for the Carbon-Free Sensitivity.</p> <p>As part of the portfolio performance indicators (scorecard), I&M will complete a comparison of our emissions to the 2005 levels for each scenario and sensitivity modeled. Regarding the availability of new resources, I&M’s near-term build limits are informed by our market intelligence. Additional information to support the near-term build limits are noted below in the response to comments 7 and 8.</p>

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	Stakeholder	Topic	Comment	I&M Response
			<p>I&M's modeling appears to be forcing in a large increase in its carbon emissions relative to its last IRP.</p> <p>² 26 U.S.C. §§ 45Y(d)(1), 48E(e)(1).</p> <p>³ 26 U.S.C. §§ 45Y(d)(3), 48E(e)(3). If 2032 were the "applicable year" as defined in Section 45Y(d)(3), then the 75% tax credit value would obtain for projects commencing construction in 2034, and, based on I&M's remarks at the September 24 stakeholder meeting, we presume I&M is estimating that such 2034 projects would reach completion in 2037.</p>	
5.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	ICE Report	<p>During the September meetings, I&M discussed that certain resources will be considered for the value they can provide to help avoid interruptions for customers. It would be helpful for stakeholders to understand how the values for this modeling were developed. We ask that I&M provide the parameters that were specified for the Interruption Cost Estimation ("ICE") Calculator so that stakeholders can replicate the values that were developed.</p>	<p>For clarification purposes, the Interruption Cost Estimation (ICE) Calculator that is currently available online was not directly used to develop the estimated avoided customer minutes of interruption (CMI) savings value presented in the Indiana IRP. The avoided CMI savings value from the application of Distribution Storage Resource Options was calculated by multiplying the following three parameters for each proposed option:</p> <ul style="list-style-type: none"> • The 3 Year (2021-2023) Historical CMI of the benefitting feeder(s). <ul style="list-style-type: none"> ○ Whitaker-Elk: 1,631,324 ○ Pleasant-Yoder: 1,072,833 • A 30% CMI Reduction Assumption attributed to the proposed distribution storage resource option. • A 0.06 \$/CMI avoided cost value which was obtained for residential customers in the Eastern AEP footprint from an analysis performed by the Lawrence Berkley National Lab and Resource Innovations as part of the ICE Calculator 2.0 update project. AEP is one of the Phase 1 sponsoring utilities of that project. More information on the ICE Calculation 2.0 project can be found here: https://icecalculator.com/recent-updates.
6.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Data Sharing	<p>As we discussed at the June 27th meeting, we have no meaningful feedback to provide on sensitivities, scenarios, and inputs until we can review the data that will be used. We appreciate the provision of the PLEXOS license, but do not yet have data to review and therefore do not have comments on</p>	<p>I&M provided the referenced data on October 4, 2024, directly to its IRP technical stakeholders who have executed a non-disclosure agreement (NDA).</p>

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	Stakeholder	Topic	Comment	I&M Response
			<p>those items at this time. On September 30th, I&M emailed stakeholders to say that the following information would be shared on October 1st:</p> <ul style="list-style-type: none"> • Load shape • Energy market price forecast • Renewable energy shapes • Gas price forecast • Cook operating data • Elkhart and Mottville operating data and generation <p>These data, which have not yet been provided, would allow us to only partially comment on the proposed market scenarios and sensitivities presented at last public stakeholder meeting.</p>	
7.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	New Thermal Resources	<p>As we discussed at the September 24th meeting, we are surprised by the relative low cost of existing thermal assets in I&M's proposed inputs. We would expect to see stiff competition for such resources, driving actual purchase prices for these assets much higher than assumed by I&M. The extraordinary load growth projects from other utilities in Indiana and across PJM are also likely to mean that few existing assets will actually be available to I&M. We request I&M provide additional data to support its cost assumptions and assumptions about the quantity of such capacity that would be available since I&M has never provided stakeholders with even summary data from its last RFP.</p>	<p>I&M provided the following data directly to its IRP technical stakeholders who have executed a non-disclosure agreement (NDA).</p> <ul style="list-style-type: none"> - Details to support the cost and quantity assumptions for its existing thermal resources. <p>I&M does expect to see prices for all resources increase due to the competition for all resources and this view is shared by many market analysts. For example, the industry resource, LevelTen PPA Price Index¹, notes in their Q3 2024 executive summary that there will be increased competition for clean energy supply due to the decarbonization goals of the companies building data centers. The company is modeling a High Technology Cost sensitivity that will reflect the most up to date cost information that the Company is seeing in the marketplace.</p> <p>¹https://www.leveltenenergy.com/ppa</p>
8.	CAC, Earthjustice,	Build Limits	<p>I&M's resource build limits for solar, wind, and battery storage are unreasonably restrictive and</p>	<p>The changes requested by the stakeholders are separated below into additional sections with responses noted for each section.</p>

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	Stakeholder	Topic	Comment	I&M Response
	Vote Solar, and Solar United Neighbors		<p>would effectively prevent I&M from meeting a substantial portion of its proposed load growth with clean energy resources. Conversely, I&M has proposed far more relaxed build limits on fossil-fuel-based resources, as well as on speculative, unproven technologies like nuclear SMRs. We request major changes to these build limits so I&M's IRP modeling assumptions does not effectively force an outcome that entails a massive buildout of new fossil-fuel resources.</p> <p>I&M has proposed unprecedented load growth of approximately 4.4 GW by the early 2030s, which would net the company about \$2.2 billion in additional annual revenues and risk extreme rate increases for customers.⁴ With such an unexpected opportunity to massively grow its profits, I&M should have ample financial capacity to invest in a much more ambitious clean energy procurement initiative than it has historically considered feasible. As a part of AEP, one of the largest and most sophisticated utilities and power generation asset owners in the country, I&M should be capable of going to significant lengths to ensure its load growth is met with clean energy solutions. Furthermore, an ambitious load growth strategy will not be consistent with Indiana's Five Pillars, and particularly Environmental Sustainability, if it results in the addition of large quantities of fossil fuel resources to power these facilities, putting existing ratepayers at risk of potentially enormous environmental compliance costs as climate regulations continue to be strengthened.</p> <p>We recommend the following changes:</p>	

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	Stakeholder	Topic	Comment	I&M Response
			⁴ Cause No. 46097, Workpaper AJW-2.	
8.1	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Build Limits: For so-called "Base Load (New Resources)"	<p>For so-called "Base Load (New Resources):</p> <ul style="list-style-type: none"> Limit nuclear small modular reactor Total Cumulative Build Limit through Planning Horizon to 2,000 MW or less rather than 5,100 MW. This is a new technology that has never been licensed by the NRC or installed in America. I&M's suggestion that it could somehow build 5,100 MW of SMRs while capping wind to only 3,200 MW and 15-year solar to 4,800 MW raises serious concerns about the reasonableness and objectivity of this analysis. It is unclear why I&M is severely constraining proven, existing, cost-effective clean energy resources while allowing a much quicker, larger, and far more speculative SMR build-out in the late 2030s and early 2040s. The Total Cumulative Build Limit through Planning Horizon for New NG Combined Cycle should be significantly reduced down from 5,600 MW to 1,500 MW or less. Building 5,600 MW of new base load fossil fuel resources beginning in the 2030s is inconsistent with the Environmental Sustainability pillar and would lock in I&M's customers to high levels of climate pollution for decades. The Total Cumulative Build Limit through Planning Horizon for New NG Combined Cycle w/CCS should be reduced down from 3,800 MW to 1,000 MW. This is a new technology that has not been widely deployed in the power sector to date. Allowing up to 3,800 MW could impose an unreasonable risk on ratepayers and is completely unrealistic in this 	<p>I&M stands by its total cumulative build limits through the planning horizon for New Baseload Resources. The Company believes the total cumulative build limits for the planning horizon (through 2059) for both SMR and CC w/ CCS are achievable. The Company is including analysis related to the environmental sustainability pillar by completing a comparison of the company's emissions to the 2005 level for each scenario and sensitivity. The Company is also including analysis related to the affordability pillar by completing rate impact analysis for each scenario and sensitivity. This analysis, in combination with the other portfolio performance indicators (scorecard), will guide the company in its selection of a Preferred Portfolio. The portfolio performance indicators have been shared with stakeholders and can be referenced in the Stakeholder Meeting 1 materials (slide 21)².</p> <p>²https://www.indianamichiganpower.com/lib/docs/community/projects/IM-irp/IM-Stakeholder-Meeting-1-6.27.pdf</p>

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	Stakeholder	Topic	Comment	I&M Response
			timeframe given the long lead time, technological complexity, and novel nature of the technology.	
8.2	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Build Limits: For the so-called “Base Load (Existing Resources)”	<p>For the so-called “Base Load (Existing Resources)” category:</p> <ul style="list-style-type: none"> • Reduce the Annual Build Limit to 1,000 MW. • Reduce the Cumulative Build Limit through 2030 from 3,600 MW to 1,000 MW. • Reduce the Total Cumulative Build Limit through Planning Horizon from 5,400 MW to 1,500 MW. Given load growth forecasts, planned resource retirements, and interconnection challenges, there does not appear to be justification for assuming large amounts of existing resources will be available to I&M during the Planning Horizon. 	<p>I&M provided the following data directly to its IRP technical stakeholders who have executed a non-disclosure agreement (NDA).</p> <ul style="list-style-type: none"> - Details to support the annual and cumulative build limits for the so-called “Base Load (Existing Resources)”
8.3	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Build Limits: For the so-called “Intermittent (Wind & Solar)” and “Intermittent (Storage)” category of resources	<p>For the so-called “Intermittent (Wind & Solar)” category of resources:</p> <ul style="list-style-type: none"> - Increase annual build limits for wind and solar to 1,500 MW per year for each subcategory (e.g., Wind (15 year), Wind (30 year), etc.), eliminate the total cumulative build limits through the planning horizon (there is no reason to artificially limit the build out of lower-cost clean energy options beyond an annual build limit), and increase the Cumulative Build Limit through 2030 to 3,000 MW for each subcategory. <ul style="list-style-type: none"> ○ Consider new strategies to significantly increase access to wind capacity, such as utility self-build projects. It is our understanding that one of the main reasons for the low 	<p>I&M’s cumulative build limits through 2030 for wind, solar, and storage consider multiple variables impacting I&M’s ability to contract for new renewable resources, including availability in the PJM queue, local permitting challenges, and other project-specific risks, known opportunities, and resource constraints. Based on PJM’s current interconnection queue timeline, projects that were placed in the “Transition Cycle #2” are expected to have executed Generator Interconnection Agreements (GIA) by the end of 2026. As a result of extended lead times for critical high voltage equipment, such as breakers and transformers, current target energization dates are roughly 30 months after execution of the GIA. Under this set of assumptions, projects in the Transition Cycle 2 would expect target energization dates in mid-2029. Typical construction schedules target a Commercial Operation Date (COD) roughly 6 months after the energization date, meaning that the Transition Cycle 2 projects would expect to achieve COD at the end of 2029, which would make them available to I&M for the 2030/31 capacity planning year. Given this logic, cumulative build limits through 2030 for wind, solar, and storage were based on projects in the PJM interconnection queue in or before Transition Cycle 2 located in the states of IN, MI, OH, IL, KY, and WV.</p>

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Stakeholder	Topic	Comment	I&M Response
		<p>availability of wind projects is local siting restrictions prevent private developers from building new facilities. I&M, as a public utility in Indiana, is not subject to having its infrastructure constrained by local siting restrictions that are unreasonable, such as county-wide moratoriums on all new wind projects.</p> <ul style="list-style-type: none"> - The First Year Available for new solar and storage projects (2028) appears too conservative. It is possible that there is some solar and / or storage capacity available sooner. We recommend modifying this to 2027 or earlier, depending on RFP results. - The Overnight Cost for wind appears to be higher than other cost assumptions we have seen recently. We request that I&M update these cost assumptions if the RFP results suggest adjustments are warranted. <p>For the so-called “Intermittent (Storage)” category, we recommend:</p> <ul style="list-style-type: none"> - Moving up the First Year Available for 6-hour and 8-hour storage to 2028. It is unclear why this year is currently 2029, when 4-hour storage is shown as 2028. - Increasing the Annual Build Limit to at least 2,000 MW for 4-, 6-, and 8-hour storage, respectively. - Increasing the Cumulative Build Limit through 2030 to at least 3,000 MW for 4-, 6-, and 8-hour storage, respectively. 	<p>Similarly, I&M’s first year availability for wind, solar, and storage consider multiple variables impacting I&M’s ability to contract for new renewable resources, including availability in the PJM queue, local permitting challenges, and other project-specific risks, known opportunities, and resource constraints. Based on PJM’s current interconnection queue timeline, projects that were placed in the “Expedited Process” (a.k.a “Fast Lane”) are expected to have executed GIAs by the end of 2024. Under this set of assumptions, projects in the Expedited Process would expect target energization dates in mid-2027. Typical solar and storage schedules target a COD roughly 6 months after the energization date, meaning that the Expedited Process project would expect to achieve COD at the end of 2027, which would make them available to I&M for the 2028/29 capacity planning year. While there are limited projects that executed GIAs ahead of the Expedited Process, I&M cannot assume that these mature projects remain uncontracted and available to I&M. Even if these projects do bid into I&M’s 2024 RFP, developers would likely be required to initiate construction of the facility prior to I&M’s receipt of regulatory approval to achieve COD prior to the 2027/28 capacity planning year, which is an unlikely scenario.</p> <p>Details regarding the PJM Interconnection Queue have been shared with stakeholders and can be reference in the Stakeholder Meeting 2 materials (slide 17)³.</p> <p>It is also important to note that I&M’s preliminary modeling results for its reference case demonstrated the total cumulative build limits for solar and storage are not a constraining factor. I&M updated the total cumulative build limit for wind as it was a constraining factor in the reference case. This was communicated to the IRP technical stakeholders on 10/17/24. I&M will continue to evaluate the build limits as we model different scenarios and sensitivities and adjust the build limits if they become a constraint to meet the load growth.</p> <p>Regarding comments on I&M’s self-build options, I&M’s current focus is to promote and maintain positive working relationships with the local</p>

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			<ul style="list-style-type: none"> - Eliminating the Total Cumulative Build Limit through Planning Horizon for 4-, 6-, and 8-hour storage and increasing it to at least 1,000 MW for 100-hour storage. 	<p>communities that it serves and that it relies upon to host its transmission and generation infrastructure. With that overarching intent, the Company is not actively considering superseding or overruling the siting and permitting decisions of local officials that represent the communities they serve for the purpose of developing new generation resources.</p> <p>I&M will update cost assumptions for wind, if warranted, in the High Technology Cost sensitivity. The High Technology sensitivity will reflect the most up to date cost information that the Company is seeing in the marketplace.</p> <p>³https://www.indianamichiganpower.com/lib/docs/community/projects/IM-irp/IN_Stakeholder_Meeting_2.pdf</p>
9.	CAC, Earthjustice, Vote Solar, and Solar United Neighbors	Power Prices	<p>We are increasingly concerned that the rapid load growth currently envisioned in I&M's service territory and across PJM are not being adequately represented in I&M's modeling. The unprecedented, rapid growth in demand at a time when new supply resources are severely constrained will result in power prices increasing. For instance, a recent ICF analysis found that data center load growth could lead to a 19% increase in U.S. power prices by 2028.⁵</p> <p>We therefore request I&M update its power prices based on refreshed analysis that includes this load growth to ensure these power price assumptions are still reasonable. For example, I&M is currently using a projection of the on-peak PJM Market Prices in its Base and EER cases that are between \$30-\$40/MWh for each year 2025 through approximately 2037 (slide 36, IRP Meeting #2) and below \$30/MWh for each year in the Low case for every year through the mid-2040s. The High case</p>	<p>The Company's portfolio analysis uses load forecasts that include the rapid load growth in development of the preferred plan.</p> <p>The market price scenarios do not include rapid load growth. These scenarios were created prior to the forecasted rapid load growth. The Company is using load forecasts that include the hyperscale load for the modeling. The Company's scenarios provide a wide range of power prices used in development and testing of the Preferred Portfolio. The wide range is intended to address any unknown economic factors at the time of scenario development. The Company maintains its position that the range of current scenarios for power prices is sufficiently wide to encapsulate the potential near-term price risk identified by CAC.</p> <p>Note: updated bold response on 10/28/2024</p>

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			<p>has on-peak prices below \$50/MWh through 2035. These assumed prices might warrant upward revisions.</p> <p>⁵ https://www.icf.com/news/2024/09/icf-report-projects-surge-in-us-electricity-demand-by-2028</p>																																																																																																																																																																																																																																										
10	Black Sun Light Sustainability	MPS	I would like to review the Market Potential Study (MPS) models.	I&M issued an NDA that is required to view the MPS models.																																																																																																																																																																																																																																									
11	CAC	MPS	I notice that the IRP website still has the 2021 MPS. Could you please provide the <u>public</u> 2024 MPS documents? I didn't see those in the Stakeholder Comment document, but let me know if I missed it.	I&M is working on finalizing the public MPS and once finalized will be posted to the I&M website. I&M will notify the requesting the CAC once posted to the I&M website.																																																																																																																																																																																																																																									
12	Ranger Power	Preferred Portfolio	<p>Can you please clarify the difference between "Existing CC/CT" and "New CC/CT" in the table below? I am not clear on what the zeros mean in the existing columns - shouldn't the existing resources already be generating and thus have values in those columns?</p> <div> Preferred Portfolio</div> <table><tr><th>Year</th><th>Wind</th><th>Solar</th><th>Storage</th><th>New CC</th><th>Existing CC</th><th>New CT¹</th><th>Existing CT²</th><th>Hydro³</th><th>BA, EE, S&B, C&E</th><th>Short Term Capacity</th><th>Observations:</th></tr><tr><td>2025</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td rowspan="12"><ul style="list-style-type: none">Diverse mix of wind, solar, storage, existing CC's and CT's are selected in the first year available to meet the capacity and energy obligationSubstantial wind, solar, existing CC's, and existing CT's selected over the planning horizonCook 2R selected in 2035 and 2038Leverages Rockport redevelopment opportunities with new CT selected in 2030 and 300 MW of S&B's selected in both 2036 and 2037. These resources reduce the need for existing CC's compared to the Expanded Wind Availability (EER) portfolio, adding new capacity to PIM's and I&M's systemElkhart and Motville Hydro relicensing selected in 2030 and 2033, respectively</td></tr><tr><td>2026</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2027</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2028</td><td>1,000</td><td>999</td><td>50</td><td>0</td><td>1,000</td><td>0</td><td>1,000</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2029</td><td>1,000</td><td>999</td><td>50</td><td>0</td><td>1,000</td><td>0</td><td>1,000</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2030</td><td>1,000</td><td>999</td><td>50</td><td>0</td><td>1,000</td><td>600</td><td>1,000</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2031</td><td>1,400</td><td>999</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2032</td><td>1,800</td><td>880</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2033</td><td>2,200</td><td>1,400</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2034</td><td>2,600</td><td>2,071</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>0</td><td>0</td><td>0</td></tr><tr><td>2035</td><td>3,000</td><td>2,722</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>880</td><td>194</td><td>0</td></tr><tr><td>2036</td><td>3,300</td><td>3,373</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>1,338</td><td>131</td><td>0</td></tr><tr><td>2037</td><td>3,600</td><td>4,024</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>1,488</td><td>128</td><td>0</td></tr><tr><td>2038</td><td>4,000</td><td>4,675</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>2,480</td><td>125</td><td>0</td></tr><tr><td>2039</td><td>4,000</td><td>4,675</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>2,480</td><td>122</td><td>0</td></tr><tr><td>2040</td><td>4,000</td><td>4,786</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>2,480</td><td>119</td><td>0</td></tr><tr><td>2041</td><td>4,000</td><td>2,582</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>2,480</td><td>111</td><td>0</td></tr><tr><td>2042</td><td>4,000</td><td>2,589</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>2,480</td><td>105</td><td>0</td></tr><tr><td>2043</td><td>3,000</td><td>2,555</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>2,480</td><td>99</td><td>0</td></tr><tr><td>2044</td><td>1,000</td><td>2,542</td><td>50</td><td>0</td><td>4,500</td><td>600</td><td>1,500</td><td>2,480</td><td>94</td><td>0</td></tr></table> <p>¹The 600 MW New CTs selected in 2030 are assumed to be located at the Rockport site. ²Nuclear includes Cook 2R and S&B. S&B's shifts are assumed to be located at the Rockport site.</p>	Year	Wind	Solar	Storage	New CC	Existing CC	New CT ¹	Existing CT ²	Hydro ³	BA, EE, S&B, C&E	Short Term Capacity	Observations:	2025	0	0	0	0	0	0	0	0	0	0	<ul style="list-style-type: none">Diverse mix of wind, solar, storage, existing CC's and CT's are selected in the first year available to meet the capacity and energy obligationSubstantial wind, solar, existing CC's, and existing CT's selected over the planning horizonCook 2R selected in 2035 and 2038Leverages Rockport redevelopment opportunities with new CT selected in 2030 and 300 MW of S&B's selected in both 2036 and 2037. 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The zeros in the table represent years, both previous and current, where no resources in those categories are planned to be added to I&M’s generation portfolio. The difference is that the "Existing CC/CT" column is referring to existing CC/CT facilities that are currently operating and are expected to be available in the market and the "New CC/CT" column refers to new development facilities that are not yet operating and would be constructed. For example, in the “Existing CT” column the Preferred Portfolio calls for I&M to acquire 1,000 MW of existing CT in 2028 and acquire an additional 500 MW existing facility in 2031.
Year	Wind	Solar	Storage	New CC	Existing CC	New CT ¹	Existing CT ²	Hydro ³	BA, EE, S&B, C&E	Short Term Capacity	Observations:																																																																																																																																																																																																																																		
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13	Google	Load Forecast	I&M IRP team, could possibly send me the load forecast used for the base case in excel format with annual peak load values? Thank you for your help.	Requested information provided to stakeholder.																																																																																																																																																																																																																																									