



Via Electronic Filing

May 1, 2020

Mary M. Becerra  
Secretary to the Commission  
Indiana Utility Regulatory Commission  
101 West Washington Street  
Suite 1500 East  
Indianapolis, Indiana 46204

**RE: IPL's 30-Day Administrative Filing No. 50329**

Dear Ms. Becerra:

Indianapolis Power & Light Company ("IPL") hereby responds to the objection filed by the Indiana Distributed Energy Alliance ("IndianaDG") to IPL's Thirty-Day Administrative Filing (the "Filing") for Rate CGS. The Filing has been assigned the tracking number 50329 by the Indiana Utility Regulatory Commission ("Commission"). The Filing was made by IPL pursuant to 170 IAC 4-4.1 *et seq.*

**The IndianaDG's Objection Fails to Meet the Requirements of 170 IAC 1-6-7**

Under 170 IAC 1-6-7, the following are the only appropriate grounds for objections to the Filing:

- (A) [The filing] is a violation of:
  - (i) applicable law;
  - (ii) a prior commission order; or
  - (iii) a commission rule.
- (B) Information in the filing is inaccurate.
- (C) The filing is:
  - (i) incomplete; or
  - (ii) prohibited under section 4 of this rule.

The IndianaDG objection does not meet any of the appropriate grounds for objection as set out in 170 IAC 1-6-7. The IndianaDG objection merely references a statement made in a filing by the Indiana Office of Utility Consumer Counselor

("OUCC") on April 13, 2020 in its objection and then specifically declines to present any argument or support for its position. The IndianaDG must, as a part of its filing, identify the basis for its objection as permitted by 170 IAC 1-6-7. The IndianaDG has failed to do so in this filing. IPL continues to assert that its Filing is not in violation of any applicable law, commission order, or commission rule; information in the filing is accurate; and the filing is complete and is not prohibited under section 4 of the rule.

### **The IndianaDG's Objection Was Not Timely**

The IndianaDG's objection was filed on April 24, 2020. IPL filed the Filing, on February 28, 2020. The IndianaDG's objection was filed 56 days later. This is well beyond the thirty-day requirement for the Commission to act in these sorts of matters. While 170 IAC 1-6-7 does not explicitly state that objections must be made within thirty (30) days of a filing, it stands to reason that objections should be filed before the date by which the Commission is required to act.

### **Conclusion**

The IndianaDG's objection to IPL's Filing is without merit. The Filing is neither incomplete nor inaccurate, and it is not in violation of applicable law, Commission order, or Commission rule. For the reasons set forth herein, IPL's Filing should be presented to the Commission for consideration and, thereafter, should be approved without modification.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Grimmer", written in a cursive style.

Nick Grimmer,  
Indiana Regulatory Counsel