

Project-Specific Commitments

Written commitments filed with the variance petition provide:

“Through collaboration with the local electric provider, the data center developer will pay all related costs associated with the new substation for the data center and the additional generation, transmission, and distribution infrastructure needed to service the data center.”

If approved, these commitments will be recorded in the county recorder's office and run with the land.

The Indiana Utility Regulatory Commission (IURC)

The IURC will review any tariff or large load contract for consistency with HEA 1007 and applicable affordability protections. Governor Braun recently appointed three new commissioners, with a specific emphasis on affordability. The IURC called for all investor-owned utilities to present to the IURC on March 24 on affordability. I&M announced in early March that they will be filing for a rate decrease due to large load growth. See: [I&M Announces Base Rate Reduction for Hoosiers Through Customer Benefits Plan](#). AES Indiana also put out a recent press release in April 2026 announcing a partnership with another large load customer in the service territory which will deliver over \$770 Million in customer savings while powering central Indiana growth. See: AES Indiana press release in the petition file.

Governor's Strategic Energy Growth Task Force

Additionally, The Governor's Strategic Energy Growth Task Force is still meeting and has a plan to submit in coming months. The Gov. Braun has said, “AI is going to be key to the jobs and wages of the future, but data centers can't stick Hoosiers with the power bill. Companies that want big power in Indiana should pay their own way.” More recently on March 9, 2026, the Governor held a press conference on utility affordability addressing his demands that data centers pay for their energy. [Gov. Braun says energy affordability plan is working. Here's what's changed.](#)

Regional Grid Context

Indiana operates within the regional transmission system with most of the State administered by Midcontinent Independent System Operator, which spans 15 states and portions of Canada. Utilities within this footprint participate in a shared wholesale energy market in which generation is dispatched regionally.

While utilities such as AES Indiana maintain territorial service obligations and conduct integrated resource planning, energy demand for data processing facilities has a regional component as well.

As James Briggs, IndyStar reported stated: “The electric grid that powers Indianapolis doesn't stop at the Marion County border. If Indianapolis rejects [a] data center, the company will build it somewhere else — most likely drawing from the same grid as if it had been built in [Marion County] ... However you feel about data centers' electricity and water consumption, it's going to happen with or without Indianapolis' consent. The difference is that, if the City-County Council says no, Indianapolis will miss out on tax revenue.”

- Why Indianapolis can't afford to reject Google's \$1 billion data center 9/10/2025.

A MISO transmission map has been included in the Exhibit Book, to illustrate this regional connectivity.

Reliability and Load Characteristics

Modern data centers are not like traditional industrial facilities. In colder climates, their cooling systems can leverage free cooling, meaning ambient temperatures assist closed-loop cooling systems and reduce mechanical cooling energy demand during the winter months precisely when residential heating demand rises. Data centers operate continuously but experience these seasonal cooling efficiencies, making them more energy-efficient in winter which has become an important peak for utilities.

Combined with statutory cost protections, this makes them stable, predictable utility partners rather than speculative grid risks. Moreover, large load growth can help spread fixed infrastructure costs across a broader customer base.

AES Integrated Resource Plan (IRP)

AES published their most recent IRP in late 2025, which included the following chart that shows benefits for AES customers from data center load growth:

Data Center Case	Portfolio	AFFORDABILITY				RELIABILITY, RESILIENCY, AND STABILITY				
		10-Year Levelized Supply Cost	25-Year Supply Cost	10-Year PVRR	25-Year PVRR	Market Purchases + Sales	25-yr energy purchases, % of load	25-yr energy sales, % of load	Dispatchable Capacity, Percent of Peak (2035)	Dispatchable FIRM Capacity, Percent of Peak (2035)
	Units →	\$2026/MWh	\$2026/MWh	2026\$MM	2026\$MM	%	%	%	%	%
No Data Center Load	Reference Case	\$149	\$161	\$5,126	\$10,092	26%	16%	10%	111%	90%
	Gas Infrastructure Challenges	\$149	\$162	\$5,154	\$10,161	21%	13%	8%	111%	90%
	High Regulatory: Environmental	\$156	\$188	\$5,906	\$15,455	25%	11%	14%	111%	91%
	Stable Markets Scenario	\$149	\$161	\$5,126	\$10,070	27%	18%	9%	111%	90%
Low Data Center	Reference Case	\$144	\$151	\$5,985	\$12,654	23%	15%	8%	121%	99%
	Gas Infrastructure Challenges	\$148	\$153	\$6,400	\$13,047	21%	11%	10%	118%	98%
	High Regulatory: Environmental	\$153	\$180	\$7,099	\$19,827	26%	12%	14%	117%	96%
	Stable Markets Scenario	\$145	\$151	\$6,020	\$12,699	23%	15%	8%	119%	97%
Mid Data Center	Reference Case	\$138	\$139	\$7,971	\$18,187	17%	12%	5%	122%	102%
	Gas Infrastructure Challenges	\$139	\$140	\$8,220	\$18,499	17%	10%	7%	117%	99%
	High Regulatory: Environmental	\$151	\$174	\$10,236	\$30,040	21%	10%	11%	118%	98%
	Stable Markets Scenario	\$138	\$139	\$7,967	\$18,266	17%	12%	4%	121%	100%
High Data Center	Reference Case	\$134	\$132	\$9,975	\$23,754	15%	10%	5%	118%	102%
	Gas Infrastructure Challenges	\$135	\$133	\$10,132	\$24,032	14%	8%	7%	125%	109%
	High Regulatory: Environmental	\$145	\$164	\$12,246	\$37,871	18%	10%	8%	120%	99%
	Stable Markets Scenario	\$134	\$133	\$9,959	\$23,990	14%	10%	4%	133%	112%

Conclusion

Electricity demand and ratepayer impacts are governed by a comprehensive federal and state regulatory framework, including HEA 1007, the IEDC energy neutrality requirement, regional transmission organizations, and oversight by the Indiana Utility Regulatory Commission. These laws require large load customers such as data centers to bear the costs associated with infrastructure and demand growth. The developer has committed through a recorded commitment to pay project-specific infrastructure costs in addition to generation, transmission, and distribution.

The evidence in the record demonstrates that the project's energy demand will be subject to these statutory protections and paid for by the petitioner. Therefore, it does not undermine the Commission's ability to make findings for approval.