FILED August 22, 2018 INDIANA UTILITY REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTLITY REGULATORY COMMISSION

VERIFIED PETITION OF SOUTHERN INDIANA)
GAS AND ELECTRIC COMPANY d/b/a VECTREN)
ENERGY DELIVERY OF INDIANA, INC., FOR: (1))
AUTHORITY TO CONSTRUCT, OWN AND)
OPERATE A SOLAR ENERGY PROJECT AND A)
FINDING THAT SUCH PROJECT CONSTITUTES A)
CLEAN ENERGY PROJECT PURSUANT TO IND.)
CODE CH. §8-1-8.8; (2) ISSUANCE OF A) CAUSE NO. 45086
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY FOR THE CONSTRUCTION OF THE)
SOLAR ENERGY PROJECT PURSUANT TO IND.)
CODE CH. §8-1-8.5; AND (3) AUTHORITY TO)
TIMELY RECOVER COSTS INCURRED DURING)
CONSTRUCTION AND OPERATION OF THE)
PROJECT IN ACCORDANCE WITH IND. CODE §8-)
1-8.8-11.)

PETITION TO INTERVENE OF CITIZENS ACTION COALITION OF INDIANA

The Citizens Action Coalition of Indiana, Inc. ("CAC") by counsel, respectfully requests, pursuant to 170 I.A.C. 1-1.1-11, that the Commission permits it to intervene and become a party to this Cause. In support of its Petition, CAC would show the Commission:

- 1. CAC is a membership organization with approximately 40,000 members in Indiana. CAC operates as a non-profit corporation under the laws of the State of Indiana and its principal office is at 1915 West 18th Street, Suite C, Indianapolis, Indiana 46202. Its telephone number is (317) 735-7764.
 - 2. The name, address and telephone number of counsel for CAC is as follows:

Jennifer A. Washburn, Atty. No. 30462-49 Margo Tucker, Atty. No. 34803-49 Citizens Action Coalition 1915 West 18th Street, Suite C Indianapolis, Indiana 46202 Phone: (317) 735-7764, (317)439-4032

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3. Parties and Commission staff wishing to serve papers on counsel for CAC in this

Cause should use the address above.

4. The purpose of this proceeding involves Southern Indiana Gas and Electric Company's

("Vectren") request for approval to construct, own, and operate a solar energy project totaling

approximately 50 megawatts of alternating current within its service territory.

5. CAC includes among its members numerous individuals and families who are

residential retail customers of Vectren and have a substantial interest in the proceeding. They pay

Vectren rates and charges for residential service, which this proceeding will impact if Vectren

gains approval.

6. CAC has regularly appeared on behalf of their members before the Commission,

including Cause Nos. 43922 (NIPSCO FIT), 43976 (Rockport SNG), 43114 and 43114 IGCC-1

through 16 (Edwardsport Cases), 44217 (Duke Environmental Compliance), 44242 (IPL MATS

Compliance), 44310 (Self Direct Investigation), 42622 and 42718. No other party can

adequately represent the substantial interests of CAC's members.

7. The addition of CAC as a party to this Cause will not unduly broaden the issues or

otherwise burden the proceedings. CAC understands that it is bound by all rulings and other

matters of record prior to the time that this Petition is granted, and we take the case as we find it

as of the date of intervention.

8. For the foregoing reasons, CAC respectfully requests that the Commission grants it

leave to intervene and make it party to this proceeding.

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The undersigned Margo Tucker has been duly authorized to file this petition to intervene with the Commission on behalf of CAC.

Respectfully submitted,

Margo Jun-Margo Tucker

Attorney at Law, Atty. No. 34803-49

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing document was served via electronic mail, this 22^{nd} day of August, 2018:

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Respectfully submitted,

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