

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

PETITION OF MIDWEST NATURAL GAS)
CORPORATION FOR APPROVAL OF AN)
ADJUSTMENT IN ITS BASE RATES RELATED) CAUSE NO. 44942 – TDSIC-3
TO ITS TDSIC PLAN FOR ELIGIBLE)
TRANSMISSION AND DISTRIBUTION)
IMPROVEMENTS PURSUANT TO IND. CODE §
8-1-39-1, *et seq.*

VERIFIED PETITION

TO: THE INDIANA UTILITY REGULATORY COMMISSION

Midwest Natural Gas Corporation (hereinafter “Petitioner”) respectfully represents and shows that:

1. Petitioner is a corporation duly organized, and existing under and through the laws of the State of Indiana. Petitioner is a public utility engaged in and authorized by the Indiana Utility Regulatory Commission (hereinafter “Commission”) to purchase, transfer, distribute, and sell natural gas to customers in rural areas of Daviess, Greene, Monroe, Jackson, Jennings, Knox, Orange, Scott, Clark and Washington counties, Indiana. Petitioner’s office is located at 101 S.E. Third Street, Washington, Indiana.

2. Petitioner is a public utility as defined by Ind. Code § 8-1-2-1, and Ind. Code § 8-1-39-4. Petitioner is also an energy utility as defined by Ind. Code § 8-1-2.5-2. As such, Petitioner is subject to the jurisdiction of this Commission.

3. Petitioner received approval from the Commission of its TDSIC Plan under Cause No. 44942 through a Final Order on September 22, 2017. Such TDSIC Plan described Petitioner’s intent of constructing certain distribution facilities through various phases; described the estimated cost of such additional plant; and described the anticipated time required to complete the construction in order to provide natural gas service to currently unserved rural areas within its

service territory and improve the reliability of its existing service. Petitioner now seeks recovery of a portion of its capital expenditures and TDSIC costs as permitted under Ind. Code § 8-1-39-9 and as supported by the evidence in this Cause. Pursuant to Ind. Code § 8-1-39-1 et seq., and specifically Ind. Code § 8-1-39-9, Petitioner believes the Commission has jurisdiction over the subject matter of this Petition.

4. In accordance with Ind. Code § 8-1-39-9 Petitioner has used the customer class revenue allocation factors for firm load established in its most recent retail base rate case. Petitioner has previously updated the Commission on its 7 year plan through its TDSIC-1 and TDSIC-2 filings. Petitioner's testimony in this TDSIC-3 provides additional updates of Petitioner's 7 year plan. The projected effects of this TDSIC-3 request on Petitioner's current retail rates is set forth in Schedule 8 attached to Petitioner's testimony. Petitioner has also identified the anticipated impact on rates for the various phases of its 7 year plan. Petitioner has filed the verified testimony of its President, David A. Osmon in support of its requested approval of this TDSIC-3.

5. Petitioner's base rates are those established by the Commission on August 16, 2017 in Cause No. 44880. Petitioner would note such base rates have been impacted by the Commission's Orders in Cause No. 45032, and Petitioner's 30 day filing in TD 50382.

6. The name and address of counsel representing Petitioner in this matter and on whom service of all papers should be made is:

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WHEREFORE, Midwest Natural Gas Corporation respectfully requests that this Petition be entered of record; that the Commission hold such hearings as it deems necessary; thereafter issue an order to the Petitioner granting the requested relief and all other relief supported by the evidence in this Cause.

Respectfully submitted,



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Counsel for Petitioner,
Midwest Natural Gas Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following counsel of record electronically or by hand delivery this 12th day of July 2021:

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A handwritten signature in black ink, appearing to read 'L. Parvin Price', is written over a horizontal line.

L. Parvin Price