STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT COMPANY)	
("IPL") FOR (1) AUTHORITY TO INCREASE RATES AND)	
CHARGES FOR ELECTRIC UTILITY SERVICE, (2))	
APPROVAL OF REVISED DEPRECIATION RATES,)	
ACCOUNTING RELIEF, INCLUDING UPDATE OF THE)	
MAJOR STORM DAMAGE RESTORATION RESERVE)	
ACCOUNT, APPROVAL OF A VEGETATION)	
MANAGEMENT RESERVE ACCOUNT, INCLUSION IN) CAUSE NO. 4502	19
BASIC RATES AND CHARGES OF THE COSTS OF CERTAIN	1)	
PREVIOUSLY APPROVED PROJECTS, INCLUDING THE)	
EAGLE VALLEY COMBINED GAS TURBINE, THE)	
NATIONAL POLLUTION DISCHARGE ELIMINATION)	
SYSTEM AND COAL COMBUSTION RESIDUALS)	
COMPLIANCE PROJECTS, RATE ADJUSTMENT)	
MECHANISM PROPOSALS, COST DEFERRALS,)	
AMORTIZATIONS, AND (3) APPROVAL OF NEW)	
SCHEDULES OF RATES, RULES AND REGULATIONS FOR)	
SERVICE.)	

<u>PETITION TO INTERVENE OF INTERNATIONAL BROTHERHOOD OF</u> ELECTRICAL WORKERS, LOCAL UNION NO. 1395

The International Brotherhood of Electrical Workers, Local Union No. 1395 ("Local 1395"), by counsel, respectfully requests, pursuant to 170 I.A.C. 1-1.1-11, the Commission permit it to intervene and become a party to this Cause. In support of its petition, Local 1395 states:

1. Local 1395 is a labor organization that represents approximately 900 members who are employed by IPL. Local 1395 is a non-profit unincorporated labor association. Its principal office is 5140 Madison Avenue, Suite 1A, Indianapolis, IN 46227. Its telephone number is (317) 784-9234.

2. The name, address, telephone number, and e-mail address of counsel for Local 1395 is as follows:

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- 3. Parties and Commission staff wishing to serve papers on counsel for Local 1395 should use the address above.
- 4. The purpose of this proceeding includes Indianapolis Power & Light Company's request for approval to increase its rates and charges, among other things.
- 5. Local 1395 and its members have a substantial interest in this proceeding. As the representative of employees of IPL, Local 1395 has an interest in the representations and requests of IPL as they pertain to the portion of its rates attributable to employee compensation, including but not limited to wages, retirement benefits, and health benefits.
- 6. Local 1395 has appeared on behalf of its members in previous matters before the Commission relating to IPL, including but not limited to Cause Nos. 43385 and 39348.
- 7. The addition of IBEW Local 1395 as a party to this Cause will not unduly broaden the issues or otherwise burden the proceedings. IBEW Local 1395 understands that it is bound by all rulings and other matters of record prior to the time this Petition is granted and takes the case as it is on the date of intervention.

WHEREFORE, the International Brotherhood of Electrical Workers, Local 1395 respectfully requests that the Commission grant it leave to intervene and make it a party to this proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail or U.S. Mail, first class postage prepaid, on this 23nd day of March 2018, to the following:

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