

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF NORTHERN INDIANA )  
PUBLIC SERVICE COMPANY LLC FOR )  
APPROVAL OF ITS PROPOSED 2022-2023 )  
ENERGY EFFICIENCY PLAN FOR ELECTRIC ) CAUSE NO. 45456  
SERVICE AND ASSOCIATED RATEMAKING )  
AND ACCOUNTING TREATMENT, INCLUDING )  
TIMELY RECOVERY THROUGH NIPSCO'S )  
DEMAND SIDE MANAGEMENT ADJUSTMENT )  
MECHANISM OF ASSOCIATED COSTS )  
(INCLUDING PROGRAM OPERATING COSTS, )  
LOST REVENUES, AND FINANCIAL )  
INCENTIVES), IN ACCORDANCE WITH )  
INDIANA CODE SECTION 8-1-8.5-10, AND FOR )  
AUTHORITY TO DEFER PROGRAM COSTS. )

**PETITION TO INTERVENE OF CITIZENS ACTION COALITION OF INDIANA**

Citizens Action Coalition of Indiana, Inc. ("CAC"), by counsel, respectfully requests, pursuant to 170 I.A.C. 1-1.1-11, 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 18<sup>th</sup> Street, Suite C, Indianapolis, Indiana 46202. Its telephone number is (317) 205-3535.

2. The name, address and telephone number of counsel for CAC is as follows:

Counsel of Record:

Jennifer A. Washburn, Atty. No. 30462-49  
Citizens Action Coalition  
1915 West 18<sup>th</sup> Street, Suite C  
Indianapolis, Indiana 46202

With a copy to:

Reagan Kurtz  
Citizens Action Coalition  
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[rkurtz@citact.org](mailto:rkurtz@citact.org)

3. Parties and Commission staff wishing to serve papers on counsel for CAC in this Cause should use the addresses above.

4. The requested relief of NIPSCO in this proceeding is for approval and associated cost recovery for proposed energy efficiency (“EE”) programs for the period January 1, 2022 through December 31, 2023 (“Plan”) for electric service, including NIPSCO’s proposed EE goals, the proposed programs to achieve such goals, the program budget and costs, and the evaluation, measurement, and verification (“EM&V”) procedures for the program alongside associated ratemaking and accounting treatment for the Plan.

5. CAC includes among its members’ numerous individuals and families who are residential retail customers of NIPSCO and have a substantial interest in the proceeding. They pay NIPSCO rates and charges for electricity, which this proceeding will impact if NIPSCO gains approval of the requested Plan. CAC members also are dependent upon NIPSCO’s facilities, equipment, programs and personnel for the reliability of their utility services, thus any changes would impact them. This case directly impacts NIPSCO’s EE programs, which will therefore impact CAC’s members for better or for worse. Thus, CAC has a substantial interest in this proceeding.

6. CAC has regularly appeared on behalf of their members before the Commission. No other party can adequately represent the substantial interests of CAC’s members.

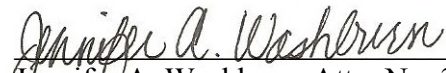
7. The addition of CAC as a party to this Cause will not unduly broaden the issues or otherwise burden the proceedings. CAC understands that it is bound by all rulings and other

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 CAC a party to this proceeding.

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

Respectfully submitted,

A handwritten signature in cursive script, reading "Jennifer A. Washburn".

Jennifer A. Washburn, Atty. No. 30462-49  
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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, this 20<sup>th</sup> day of November, 2020, to the following:

### **NIPSCO**

Mark Alson

Alison Becker

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### **Indiana Office of Utility Consumer Counselor**

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Jennifer A. Washburn