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INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE JOINT PETITION)
OF INDIANA MICHIGAN POWER COMPANY) CAUSE NO. 44560
AND UNITED REMC PURSUANT TO I.C. 8-1-2.3-6)
FOR APPROVAL OF AN AGREED CHANGE IN)
THE BOUNDARIES OF THEIR RESPECTIVE)
ASSIGNED SERVICE AREAS ON U.S.G.S. FACET)
MAP W-8-1 IN ALLEN COUNTY, INDIANA)

VERIFIED JOINT PETITION
TO MODIFY SERVICE AREA BOUNDARIES

Joint Petitioners, Indiana Michigan Power Company ("I&M") and United REMC ("United") (collectively, "Joint Petitioners"), pursuant to IND. CODE §8-1-2.3-6(2), jointly petition the Indiana Utility Regulatory Commission ("Commission") for approval of changes in the boundaries of their respective assigned service areas to which I&M and United have mutually agreed. In support of this Joint Petition, Joint Petitioners respectfully represent to the Commission the following:

1. I&M is a corporation organized under the laws of the State of Indiana, with its principal office and place of business located at Fort Wayne, Indiana. I&M has corporate power and authority, among other things, to engage in generating, transmitting, distributing and selling electric energy within the States of Indiana and Michigan. I&M is a "public utility" within the meaning of IND. CODE §8-1-2-1 and is lawfully engaged in the provision of electric services under duly acquired indeterminate permits and franchises within Indiana. I&M is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana.

2. United is a rural electric membership cooperative duly organized and existing under the laws of the State of Indiana, with its principal office and place of business located in

Markle, Indiana. United is subject to the jurisdiction of the Commission with respect to assigned service territory, in the manner and to the extent provided by the laws of the State of Indiana.

3. United and Wabash County REMC, in compliance with the provisions of IND. CODE §8-1-13-6, have agreed to consolidate into and under the name of Heartland Rural Electric Membership Corporation, effective November 1, 2014.

4. I&M and United are both “electricity suppliers” within the meaning of IND. CODE §8-1-2.3-2 and both furnish retail electric service to areas in Allen County, Indiana with existing electric distribution lines.

5. The initial service area boundaries between I&M and United on U.S.G.S. Facet W-8-1, among others, were approved in the Commission’s January 29, 1986 Order in Cause No. 36299-S 210(X). Since the establishment of those boundary lines, there has occurred development of real estate and the need to service new developments. In particular, an agriculture hog operation is under construction at 828 West Hamilton Road in southwest Allen County, Indiana. The property that is the subject of this Joint Petition, and which is now in I&M’s service territory but will become part of United’s service territory upon Commission approval of the boundary change, consists of approximately 46 acres. There are currently no existing structures on this property other than the hog operation that is under construction.

6. Joint Petitioners have mutually agreed to modify a portion of their respective assigned service area boundaries as reflected in their “Letter of Agreement Regarding Modification of Service Area Boundary” (the “Agreement”), attached hereto as Joint Petitioners’ Exhibit “A.” Joint Petitioners propose to modify the boundary lines between their respective assigned service areas in accordance with the terms of the Agreement. Joint Petitioners request

the Commission to approve the proposed service territory boundary change as marked on Exhibit C. Joint Petitioners have agreed that the modification of the assigned service area is in the best interest of all involved. The proposed change of the assigned service area boundary of I&M and United will not result in any exchange of facilities or monies between the Joint Petitioners or modify the service to any current customer of either Petitioner.

7. Modification of the assigned service area boundary on U.S.G.S. Facet No. W-8-1 as proposed herein will not cause the duplication of electric utility facilities, waste of materials or resources, or uneconomic, inefficient or inadequate electric service to the public.

8. A copy of Facet Map W-8-1, indicating the boundary change area is attached hereto as Exhibit B. A map which illustrates the service area boundary to be changed is attached hereto as Exhibit C.

9. In accordance with IND. CODE §8-1-2.3-6(2), United will cause notice of the proposed boundary change to be published in a newspaper of general circulation in Allen County, and file proof of such publication with the Commission upon receipt.

10. The name and address of I&M's attorney in this matter duly authorized to accept service of all pleadings, orders and other documents is:

Kelly S. Earls (Atty. No. 29653-49)
Ice Miller LLP
One American Square, Suite 2900
Indianapolis, IN 46282-0200
317 -236-2271 (telephone)
317-592-4684 (facsimile)
kelly.earls@icemiller.com

Additionally the following should be copied on all notices regarding this filing:

William W. Hix
Indiana Michigan Power Company
P. O. Box 60
Fort Wayne, IN 46801
Phone: (260) 408-3503
Fax: (260) 408-3085
E-mail: wwhix@aep.com

11. The name and address of United's attorney in this matter duly authorized to accept service of all pleadings, orders and other documents is:

Jeremy K. Nix
Matheny, Hahn, Denman & Nix, LLP
45 W. Market St.
Huntington, Indiana 46750
Phone: (260) 356-7030
Fax: (260) 356-7033
Email: jnix@mhdnlaw.com

12. As requested in Appendix A to this Commission's Order in Cause No. 42868, the technical representative for I&M is William Hix, Principal Regulatory Consultant, 260-408-3503, and the technical representative for United is Brad Furr, Manager of Engineering and Operations, 260-758-3155.

13. The provisions of the Indiana Code applicable to the subject matter of this Joint Petition include IND. CODE §8-1-2.3-1 *et seq.* Specifically, the request made herein is subject to IND. CODE §8-1-2.3-6(2).

14. A proposed order granting relief requested herein is attached hereto as Exhibit D.

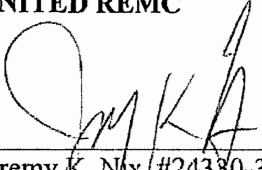
15. Verifications of the facts alleged in this Joint Petition are attached hereto and incorporated herein by reference.

WHEREFORE, I&M and United respectfully request that:

- (i) The Verified Joint Petition and its Exhibits be accepted as evidence of the truth of the matters and facts set herein;
- (ii) The Commission, without the necessity of a hearing, issue an order approving the proposed changes in assigned service area boundary lines as soon as practicable following the expiration of the twenty (20) day notice period provided in IND. CODE § 8-1-2.3-6(2); and
- (iii) Grant such other and further relief to the Joint Petitioners as may be appropriate under the circumstances.


Respectfully submitted,

UNITED REMC



Jeremy K. Nix, #24330-35
Matheny, Hahn, Denman & Nix, LLP
45 W. Market Street
Huntington, Indiana 46750

**INDIANA MICHIGAN POWER
COMPANY**



Kelly S. Earls (Atty. No. 29653-49)
Ice Miller LLP
One American Square, Suite 2900
Indianapolis, IN 46282-0200

I affirm, under the penalties for perjury, that the foregoing representations are true to the best of my knowledge, information and belief.

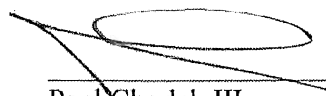
Dated: 10/29/2014

A handwritten signature in black ink, appearing to read 'Rob Pearson', written over a horizontal line.

Rob Pearson
CEO
United REMC

I affirm, under the penalties for perjury, that the foregoing representations are true to the best of my knowledge, information and belief.

Dated: 10/27/14

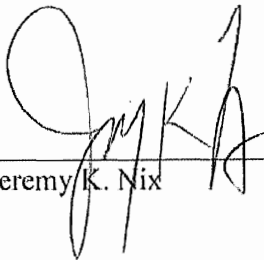


Paul Chodak III
President and Chief Operating Officer
Indiana Michigan Power Company

CERTIFICATE OF SERVICE

I hereby certify that two copies of the foregoing Joint Petition was served upon the following by United States mail, first class postage prepaid, on this 30th day of October, 2014:

Indiana Office of the Utility Consumer Counselor
Indiana Government Center North
100 N. Senate Avenue, Room N501
Indianapolis, IN 46204-2208



Jeremy K. Nix

Jeremy K. Nix
Matheny, Hahn, Denman & Nix, LLP
45 W. Market St.
Huntington, Indiana 46750
Phone: (260) 356-7030
Fax: (260) 356-7033
Email: jnix@mhdnlaw.com

Indiana Michigan Power
P.O. Box 60
Fort Wayne, IN 46801
IndianaMichiganPower.com



A unit of American Electric Power

October 1, 2014

Mr. Rob Pearson
CEO
United REMC
4563 East Markle Road, P.O. Box 605
Markle, Indiana 46770-0605

RE: Letter of Agreement Regarding Modification of Service Area Boundary

Dear Mr. Pearson:

By this letter, Indiana Michigan Power (I&M) mutually agrees with United REMC (United) to modify the service area boundary between I&M and United to allow United to serve a customer's hog barn (Customer) currently under construction on East Hamilton Road in Southwest Allen County, Indiana.

The Customer's hog barn is currently located in I&M's service area and is near United's service area. United currently has facilities capable of providing service to the Customer located approximately 800 feet from the construction site. I&M's nearest facilities are approximately 2,800 feet from the construction site. The Customer already receives service from United for other buildings on the premises and does not object to the hog barn being served by United.

Modifying the service area boundary as agreed by I&M and United will not cause a duplication of facilities, waste of materials or resources, or uneconomic, inefficient, or inadequate electric service to the public.

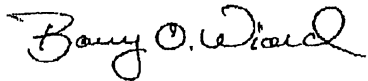
United will timely prepare and, together with I&M, file with the Indiana Utility Regulatory Commission (Commission) a request under IC 8-1-2.3-6(2) to modify the service area boundary to transfer the Customer's site into United's service area so that United may provide electric service to the Customer.

Pending the review and approval of the filing by the Commission, to promote economical and efficient service to the Customer, I&M consents under IC 8-1-2.3-(4)(a) to United providing service to the Customer in I&M's service area. In the event that the Commission does not approve the boundary modification, I&M's consent will remain in effect until I&M and United are able to make arrangements for I&M to serve the Customer without disrupting service to the Customer.

October 1, 2014
Page 2

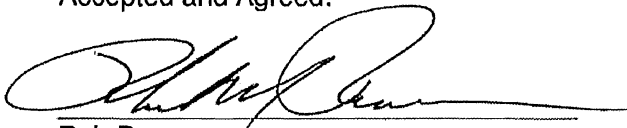
If this letter accurately sets forth the agreement between I&M and United, please indicate your approval by signing below and returning an executed copy to me.

Respectfully yours,



Barry O. Wiard
Director Customer Services and Marketing
Indiana Michigan Power Company

Accepted and Agreed:



Rob Pearson
CEO
United REMC

W-8-1

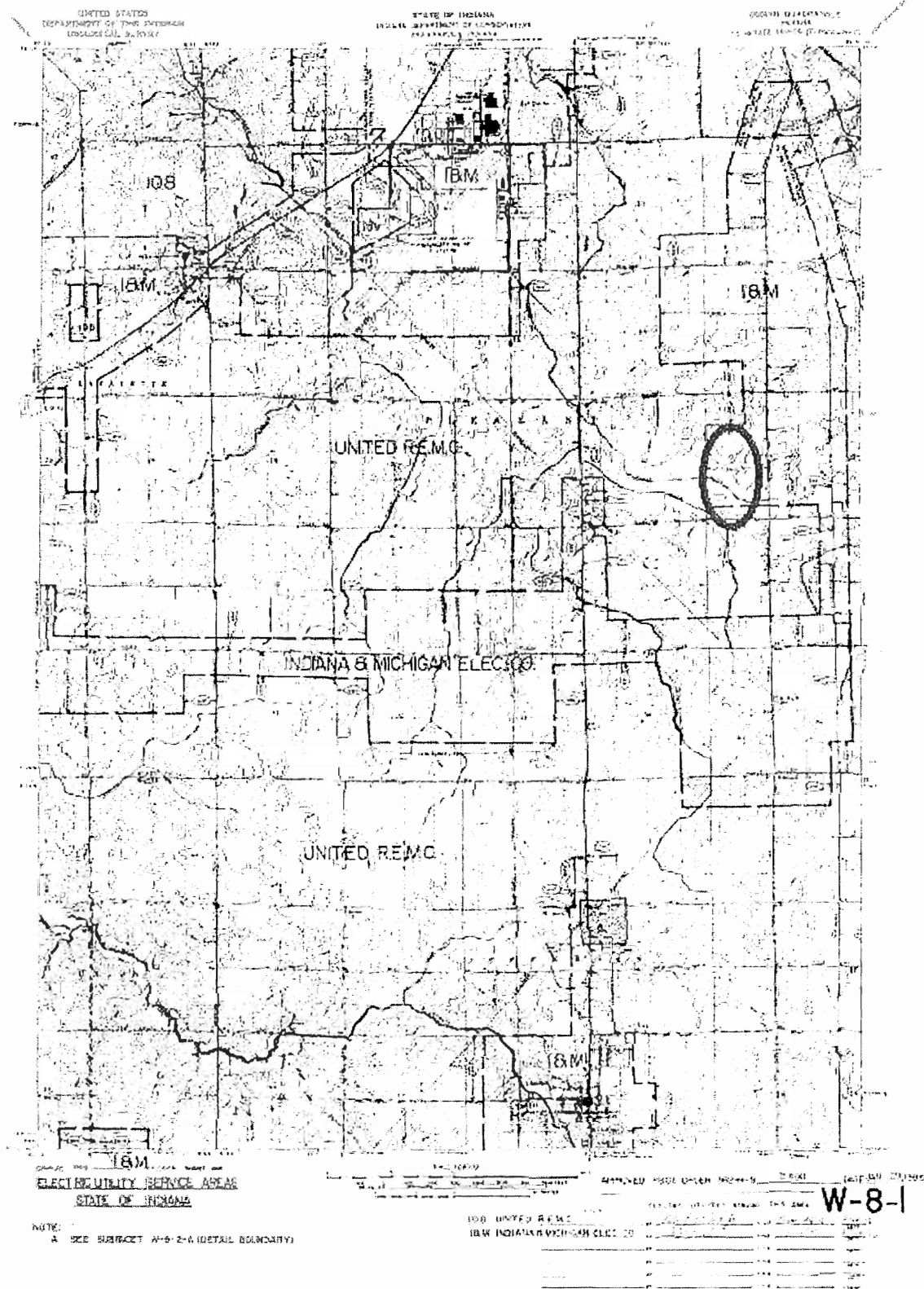
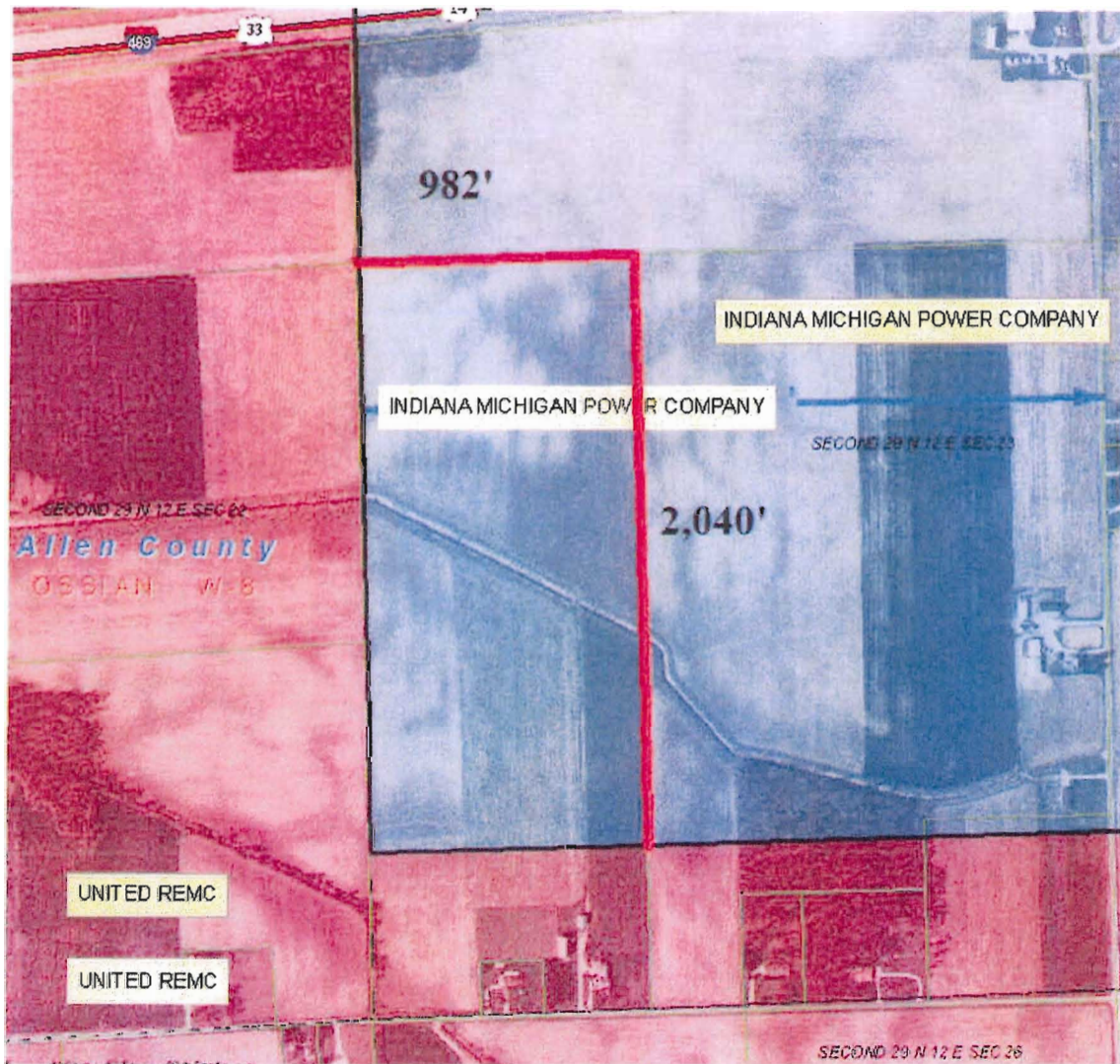


Exhibit C



Map above indicates the proposed new boundary lines between I&M and United REMC shown by the red border.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE JOINT PETITION)
OF INDIANA MICHIGAN POWER COMPANY) CAUSE NO. _____
AND UNITED REMC PURSUANT TO I.C. 8-1-2.3-6)
FOR APPROVAL OF AN AGREED CHANGE IN) APPROVED:
THE BOUNDARIES OF THEIR RESPECTIVE)
ASSIGNED SERVICE AREAS ON U.S.G.S. FACET)
MAP W-8-1 IN ALLEN COUNTY, INDIANA)

ORDER OF THE COMMISSION

Presiding Officer:

_____, Administrative Law Judge

On October 31, 2014, Indiana Michigan Power Company ("I&M") and United REMC ("United") (collectively "Joint Petitioners") filed a *Verified Joint Petition to Modify Service Area Boundaries* ("Joint Petition") with the Indiana Utility Regulatory Commission ("Commission"). Pursuant to IND. CODE §8-1-2.3-6(2), the Joint Petition seeks Commission approval of the electric service area boundary changes the Joint Petitioners' have agreed to on U.S.G.S. Facet Map W-8-1 in Allen County, Indiana. A copy of Facet Map W-8-1 is attached to the Joint Petition as Exhibit B.

The Commission, having considered the evidence and applicable law, now finds:

1. **Commission Jurisdiction.** Joint Petitioner I&M is a corporation organized under the laws of the State of Indiana, with its principal place of business in Ft. Wayne, Indiana. I&M has corporate power and authority to engage in the business of generating, transmitting, distributing and selling electric energy within the States of Indiana and Michigan. I&M is a "public utility" within the meaning of IND. CODE §8-1-2-1.

Joint Petitioner United is a rural electric membership corporation organized and existing under the laws of the State of Indiana with its principal place of business in Markle, Indiana. Effective November 1, 2014, United consolidated with Wabash County REMC into and under the name of Heartland REMC. It is engaged in the business of furnishing retail electric service to areas in Allen County, Indiana.

Both I&M and United are "electricity suppliers" within the meaning of IND. CODE §8-1-2.3-2(b). Joint Petitioners have sought the Commission's approval to change their service area boundaries pursuant to IND. CODE §8-1-2.3-6(2), which provides that the assigned service area boundaries of electricity suppliers may be changed upon a mutual agreement of the affected electricity suppliers and approval of the Commission. Accordingly, the Commission has jurisdiction over the Joint Petitioners and the subject matter of the Joint Petition.

Exhibit D – Proposed Order

2. **Relief Sought.** Joint Petitioners assert that since the initial approval of their respective assigned service area boundaries in Cause No. 36299-S 210(X) a change in circumstances has occurred involving portions of U.S.G.S. Facet Map W-8-1 in Allen County, Indiana, as a result of which I&M and United agree it would be appropriate to make certain modifications in the boundary line heretofore approved. Upon Commission approval, Joint Petitioners' area boundaries would change such that United will gain the service area marked on Exhibit C. Specifically, a hog operation is under construction and I&M and United agreed that it would be more efficient for United to serve the hog operation.

The proposed boundary line change will not require a change in the electricity supplier for any existing customers. There is no evidence before the Commission in this proceeding that the requested changes will cause (a) the duplication of electric facilities; (b) waste of materials or resources; or (c) uneconomic, inefficient or inadequate electric service to the public. Nor will the proposed change to the assigned service area boundaries result in the transfer of any facilities and monies between Joint Petitioners. There is no other evidence to the contrary before the Commission in this proceeding.

3. **Notice.** IND. CODE §8-1-2.3-6(2) in part provides:

If notice of a verified request for a change of boundary lines by mutual agreement under this subdivision is published in a newspaper of general circulation in every county in which the boundary lines are located and an affected electricity customer does not request a hearing within twenty (20) days of the last date of publication, the commission may approve the change without a hearing.

The evidence shows that notice of Joint Petitioner's Joint Petition for a change of boundary lines located on U.S.G.S. Facet Map W-8-1 was published on October __, 2014, in the *Fort Wayne Journal Gazette*. This is a newspaper of general circulation in Allen County, which is the county where the affected boundary lines are located. Proof of publication of this notice was filed with the Commission on _____, 2014, and is hereby incorporated into the record of this Cause. Twenty (20) days have passed since the date of publication of the notice and no affected electricity customer has requested a hearing. Therefore, pursuant to IND. CODE §8-1-2.3-6(2), the Commission may approve the requested boundary line changes without a hearing.

4. **Approval of Requested Boundary Modifications.** Based on the foregoing findings, we find that the agreed-upon changes to the assigned service area boundaries located on U.S.G.S. Facet Map W-8-1, as specifically depicted in the Joint Petition and exhibits attached thereto, will promote economical, efficient, and adequate electric service to the public consistent with the legislative policy set forth in IND. CODE §8-1-2.3-1 and, therefore, should be approved.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION that:

Exhibit D – Proposed Order

1. Joint Petitioners' agreed-upon service area boundary line changes, as set forth above and in the Joint Petition and exhibits attached thereto are hereby approved.
2. Within thirty (30) days of the date this Order is approved, Joint Petitioners shall coordinate with Commission Technical Staff to update the service territory mapping system to reflect the modified service area boundary approved by this Order.
3. This Order shall be effective on and after the date of its approval.

**STEPHAN, MAYS-MEDLEY, HUSTON, AND ZIEGNER CONCUR, WEBER
ABSTAINING:**

APPROVED:

I hereby certify that the above is a true and correct copy of the Order as approved.

**Brenda A. Howe
Secretary to the Commission**