

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**VERIFIED PETITION OF INDIANA OFFICE OF)
UTILITY CONSUMER COUNSELOR FOR)
GENERIC INVESTIGATION INTO RESIDENTIAL) CAUSE NO. 45736
CUSTOMER ARREARAGE AND UTILITY SERVICE)
DISCONNECTION DATA AND REQUEST FOR)
ONGOING REPORTING REQUIREMENTS)**

OUCC’S MOTION TO DISMISS UPON SETTLEMENT AGREEMENTS

The Indiana Office of Utility Consumer Counselor (“OUCC”) hereby states that it moves to voluntarily dismiss its *Verified Petition of the OUCC for a Generic Investigation* to all Respondents upon execution of two settlement agreements, attached at Exhibits A and B to this Motion to Dismiss. The OUCC states as follows:

Exhibit A, the “First Settlement Agreement”, is agreed to between the OUCC and the larger investor-owned energy utilities, namely: Duke Energy Indiana, LLC (“Duke Energy Indiana”), Indiana Gas Company, Inc. d/b/a CenterPoint Energy Indiana North (“CEI North”), Indiana Michigan Power Company (“I&M”), Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” or “AESI”), Northern Indiana Public Service Company, LLC (“NIPSCO”) and Southern Indiana Gas & Electric Company d/b/a CenterPoint Energy Indiana South (“CEI South” and collectively the “Larger IOU Energy Utilities”). Citizens Action Coalition (“CAC”) and Larger IOU Energy Utilities have granted undersigned counsel permission to represent in this submission that while CAC is not a party to the First Settlement Agreement, the Larger IOU Energy Utilities will provide the CAC with the same data provided to the OUCC under the settlement. The CAC does not object to the First Settlement Agreement.

Exhibit B is the “Second Settlement Agreement”, entered into between the OUCC and smaller gas investor-owned utilities, namely: Midwest Natural Gas Corporation (“Midwest”); Indiana Natural Gas Corporation (“Indiana Gas”); and Community Natural Gas Company (“Community”) (collectively “Small Gas IOUs”). The CAC is not a party to this Second Settlement Agreement and does not object to the Second Settlement Agreement.

This Motion to Dismiss is to the entirety of this case and shall apply to any remaining jurisdictional utility. Counsel for the OUCC reached out to the two remaining jurisdictional utilities¹ to this action, and both represented they do not oppose the Motion to Dismiss. The OUCC encourages these two utilities to provide disconnection data if available, even in the absence of a reporting requirement or settlement agreement. Such information is vital to understanding the impact of COVID and the economy on utility ratepayers.

Wherefore, the Commission should dismiss this cause pursuant to the two settlement agreements.

Respectfully submitted,



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¹ The two remaining utilities that did not enter into settlement agreements are: Ohio Valley Gas, Inc. and Citizens Energy Group.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been served upon the following parties of record in the captioned proceeding by electronic service on October 17, 2022.

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