

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE INDIANA)
UTILITY REGULATORY COMMISSION’S)
INVESTIGATION INTO THE PUBLIC UTILITY) CAUSE NO. 46043
STATUS OF DISTRIBUTED ENERGY)
RESOURCE AGGREGATORS)

**PETITION TO INTERVENE OF HOOSIER
ENERGY RURAL ELECTRIC COOPERATIVE, INC.**

COMES NOW Hoosier Energy Rural Electric Cooperative, Inc. (“Hoosier Energy”) and files this Petition to Intervene in the above-captioned proceeding pursuant to 170 IAC 1-1.1-11 and states the following:

1. Hoosier Energy is a rural electric cooperative corporation organized and existing pursuant to the laws of the State of Indiana, with its principal place of business being 2501 S Cooperative Way, Bloomington, IN 47403. Hoosier Energy is a general district corporation as described in I.C. § 8-1-13-23 and has seventeen local district corporation members in Indiana and one electric cooperative member in Illinois.¹

2. By an order of the Indiana Utility Regulatory Commission (“Commission”) dated April 17, 2024, the Commission commenced an investigation to allow the Commission to consider the public utility status of distributed energy resource

¹ Hoosier Energy’s Members Include: Bartholomew County REMC, Clark County REMC, Daviess-Martin County REMC, Decatur County REMC, Dubois REC, Inc., Harrison REMC, Henry County REMC, Jackson County REMC, Johnson County REMC, Orange County REMC, RushShelby Energy REC, Inc., South Central Indiana REMC, Southeastern Indiana REMC, Southern Indiana REC, Inc., Utilities District of Western Indiana REMC, Whitewater Valley REMC, WIN Energy REMC, and Wayne-White Counties Electric Cooperative.

(“DER”) aggregators who aggregate DERs in the wholesale electricity markets pursuant to FERC Order 2222. The Commission also encouraged those with a substantial interest in the subject matter of the investigation to seek intervention.

3. Hoosier Energy and its member system rural electric membership corporations have a substantial interest in this investigation due to the fact that there are substantial DERs in the territories of the members as well as potential aggregators of these DERs. Because of these facts, any decisions of the Commission in this proceeding will have a direct and substantial impact on Hoosier Energy and its members.

4. Hoosier Energy’s participation in this cause will not unduly broaden the issues or otherwise burden the proceedings. No other party in this matter has a relationship which would adequately protect the interests of Hoosier Energy and its members. Hoosier Energy understands it is bound by the record as it stands at the time its Petition to Intervene is granted. This petition is being filed more than five days prior to the date set for the initial public evidentiary hearing on the merits of this Cause.

6. Service of all communications should be made upon the following:

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WHEREFORE, Hoosier Energy respectfully requests that the Commission grant its Petition to Intervene, permit Hoosier Energy to become a party to this Cause, and for all other just and proper relief.

Respectfully Submitted,

By: /s/ Christopher M. Goffinet

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of April, 2024, a copy of the foregoing “Petition to Intervene of Hoosier Energy Rural Electric Cooperative, Inc.” has been served by electronic mail to:

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By: /s/Christopher M. Goffinet
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