

**STATE OF INDIANA  
INDIANA UTILITY REGULATORY COMMISSION**

**VERIFIED PETITION OF NORTHERN INDIANA PUBLIC )  
SERVICE COMPANY FOR (1) APPROVAL OF AND A )  
CERTIFICATE OF PUBLIC CONVENIENCE AND )  
NECESSITY FOR A FEDERALLY MANDATED )  
ENVIRONMENTAL COMPLIANCE PROJECT; (2) )  
AUTHORITY TO RECOVER FEDERALLY MANDATED )  
COSTS INCURRED IN CONNECTION WITH THE )  
ENVIRONMENTAL COMPLIANCE PROJECT; (3) )  
APPROVAL OF THE ESTIMATED FEDERALLY )  
MANDATED COSTS ASSOCIATED WITH THE )  
ENVIRONMENTAL COMPLIANCE PROJECT; (4) )  
AUTHORITY FOR THE TIMELY RECOVERY OF 80% OF ) CAUSE NO. 44872  
THE FEDERALLY MANDATED COSTS THROUGH RIDER )  
787 – ADJUSTMENT OF FEDERALLY MANDATED COSTS )  
AND APPENDIX I – FEDERALLY MANDATED COST )  
ADJUSTMENT FACTOR; (5) AUTHORITY TO DEFER 20% )  
OF THE FEDERALLY MANDATED COSTS FOR )  
RECOVERY IN NIPSCO’S NEXT GENERAL RATE CASE; )  
(6) APPROVAL OF SPECIFIC RATEMAKING AND )  
ACCOUNTING TREATMENT; (7) APPROVAL TO )  
DEPRECIATE THE ENVIRONMENTAL COMPLIANCE )  
PROJECT ACCORDING TO PREVIOUSLY APPROVED )  
DEPRECIATION RATES; AND (8) APPROVAL OF )  
ONGOING REVIEW OF THE ENVIRONMENTAL )  
COMPLIANCE PROJECT; ALL PURSUANT TO IND. CODE )  
§ 8-1-8.4-1 ET SEQ., § 8-1- 2-19, § 8-1-2-23, AND § 8-1-2-42. )**

**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 603 East Washington Street, Suite 502, Indianapolis, Indiana 46204-2692. Its telephone number is (317) 205-3535.

2. The name, address and telephone number of counsel for Citizens Action Coalition of Indiana is as follows:

Jennifer A. Washburn, Atty. No. 30462-49  
Citizens Action Coalition  
603 East Washington Street, Suite 502  
Indianapolis, Indiana 46204  
Phone: (317) 735-7764  
Fax: (317) 290-3700  
[jwashburn@citact.org](mailto:jwashburn@citact.org)

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

4. The purpose of this proceeding includes Northern Indiana Public Service Company's ("NIPSCO," "Petitioner," or "Company") request for approval of several projects and ongoing activities at three generation stations within NIPSCO's electric system and specific accounting and ratemaking treatment, among other things.

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 residential electric service, which this proceeding will impact if NIPSCO gains approval of spending for these projects. They also are dependent upon NIPSCO facilities, equipment, DSM programs and personnel for the reliability of their electric service, thus any changes would impact them. Also, this petition requesting approval of the several capital projects at several of its generating stations that impact future NIPSCO resource choices, including an objective evaluation of the full potential of NIPSCO's alternative resource choices, will impact CAC's members for better or for worse. CAC therefore 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 the 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. CAC would note that NIPSCO's Verified Petition at page 16, ¶24, states "In accordance with 170 IAC 1-1.1-15(e), Petitioner will seek to enter into a stipulation with the Indiana Office of Utility Consumer Counselor regarding a procedural schedule in lieu of a prehearing conference." However, the rule states "If the parties have previously reached agreement on any or all procedural matters to be considered at a prehearing conference, the agreement may be reduced to writing and filed for approval in lieu of the prehearing conference." Thus, CAC will reach out to both NIPSCO and the OUCC, the only other parties in the case as of now, and request that CAC also be included in any discussion regarding a procedural schedule in lieu of a prehearing conference since a procedural schedule has not yet been filed.

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

Respectfully submitted,

  
Jennifer A. Washburn, Atty. No. 30462-49  
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**CERTIFICATE OF SERVICE**

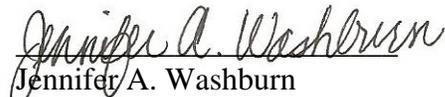
The undersigned hereby certifies that the foregoing was served by electronic mail or U.S.

Mail, first class postage prepaid, this 2<sup>nd</sup> day of November, 2016, to the following:

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Jennifer A. Washburn  
Citizens Action Coalition