

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED JOINT PETITION OF NORTHERN INDIANA)
PUBLIC SERVICE COMPANY LLC ("NIPSCO") AND INDIANA)
CROSSROADS WIND GENERATION LLC (THE "JOINT)
VENTURE") FOR (1) ISSUANCE TO NIPSCO OF A)
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY)
FOR THE PURCHASE AND ACQUISITION OF A 302 MW)
WIND FARM ("THE CROSSROADS PROJECT"); (2))
APPROVAL OF THE CROSSROADS PROJECT AS A CLEAN)
ENERGY PROJECT UNDER IND. CODE § 8-1-8.8-11; (3))
APPROVAL OF RATEMAKING AND ACCOUNTING)
TREATMENT ASSOCIATED WITH THE CROSSROADS)
PROJECT; (4) AUTHORITY TO ESTABLISH AMORTIZATION) CAUSE NO. 45310
RATES FOR NIPSCO'S INVESTMENT IN THE JOINT)
VENTURE; (5) APPROVAL PURSUANT TO IND. CODE § 8-1-)
2.5-6 OF AN ALTERNATIVE REGULATORY PLAN)
INCLUDING ESTABLISHMENT OF JOINT VENTURE)
THROUGH WHICH THE CROSSROADS PROJECT WILL)
SUPPORT NIPSCO'S GENERATION FLEET AND THE)
REFLECTION IN NIPSCO'S NET ORIGINAL COST RATE BASE)
OF ITS INVESTMENT IN JOINT VENTURE; (6) APPROVAL OF)
PURCHASED POWER AGREEMENTS THROUGH WHICH)
NIPSCO WILL RECEIVE THE ENERGY GENERATED BY THE)
CROSSROADS PROJECT, INCLUDING TIMELY COST)
RECOVERY PURSUANT TO IND. CODE § 8-1-8.8-11)
THROUGH NIPSCO'S FUEL ADJUSTMENT CLAUSE; (7))
AUTHORITY TO DEFER AMORTIZATION AND TO ACCRUE)
POST-IN SERVICE CARRYING CHARGES ON NIPSCO'S)
INVESTMENT IN JOINT VENTURE; (8) TO THE EXTENT)
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES)
WOULD TREAT ANY ASPECT OF JOINT VENTURE AS DEBT)
ON NIPSCO'S FINANCIAL STATEMENTS, APPROVAL OF)
FINANCING; (9) APPROVAL OF AN ALTERNATIVE)
REGULATORY PLAN FOR NIPSCO IN ORDER TO)
FACILITATE THE IMPLEMENTATION OF THE CROSSROADS)
PROJECT; AND (10) TO THE EXTENT NECESSARY, ISSUANCE)
OF AN ORDER PURSUANT TO IND. CODE § 8-1-2.5-5)
DECLINING TO EXERCISE JURISDICTION OVER JOINT)
VENTURE AS A PUBLIC UTILITY.)

REQUEST FOR WITHDRAWAL OF INDIVIDUAL APPEARANCE

Pursuant to 170 IAC 1-1.1-7, Northern Indiana Public Service Company LLC and Indiana Crossroads Wind Generation LLC (the “Joint Petitioners”), by counsel, hereby files its Request for Withdrawal of Individual Appearance of Claudia J. Earls in this Cause and states in support thereof as follows:

Joint Petitioners are currently represented by Claudia J. Earls and M. Bryan Little of NiSource Corporate Services Company (“NCSC”). Ms. Earls has left her position with NCSC and no longer will serve as regulatory counsel for Joint Petitioners in this Cause.

M. Bryan Little will continue representing Joint Petitioners as primary regulatory counsel in this proceeding. Service of all pleadings in this Cause to be served on Joint Petitioners in this proceeding should continue to be served on the following:

M. Bryan Little (No. 34288-92)
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Email: blittle@nisource.com

This Request for Withdrawal of Individual Appearance has been filed in this Cause at least ten (10) days prior to the next scheduled hearing date in this Cause.

Respectfully submitted,

/s/ M. Bryan Little

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Attorney for Joint Petitioners
Northern Indiana Public Service Company LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by mail transmission upon the following:

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Dated this 1st day of October, 2020.

/s/ M. Bryan Little

M. Bryan Little

