

DEC 09 2005

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION INDIANA UTILITY REGULATORY COMMISSION

VERIFIED JOINT PETITION OF INDIANA GAS)
COMPANY, INC., SOUTHERN INDIANA GAS)
AND ELECTRIC COMPANY AND THE BOARD)
OF DIRECTORS FOR UTILITIES OF THE)
DEPARTMENT OF PUBLIC UTILITIES OF THE)
CITY OF INDIANAPOLIS, AS SUCCESSOR) CAUSE NO. 42590
TRUSTEE OF A PUBLIC CHARITABLE TRUST,)
d/b/a CITIZENS GAS & COKE UTILITY,)
PURSUANT TO IND. CODE § 8-1-2-2.5 et. seq.)
FOR APPROVAL OF AN ALTERNATIVE)
REGULATORY PLAN WHICH WOULD)
ESTABLISH A PILOT UNIVERSAL SERVICE)
PROGRAM)

Joint Motion to Approve Amendment To Settlement Agreement

Joint Movants Vectren Energy Delivery of Indiana, Inc., a/k/a Southern Indiana Gas & Electric Company and Indiana Gas Company, Inc. ("Vectren"), the Indiana Office of Utility Consumer Counselor ("OUCC"), the Manufacturing and Health Providing Customers ("MHPC") and the Citizens Action Coalition of Indiana, Inc. ("CAC") (together, the "Settlement Parties"), hereby jointly request that the Commission approve an amendment to the Settlement Agreement previously approved in this proceeding and in support thereof state as follows:

- 1. On July 15, 2004, the Settlement Parties filed a Settlement Agreement with the Commission establishing agreed upon terms for the creation of the Universal Service Program ("USP") to allow eligible low income customers of Vectren to pay a reduced rate for gas service for the period of January 1, 2005 - December 31, 2006.
2. The Commission issued an order on August 18, 2004, approving the Settlement Agreement without modification.

3. In the Settlement Agreement, Vectren agreed to use contributions from its existing low income customer support programs to reduce the amount of the Universal Service Fund Rider ("Rider") charged to all gas customers to fund the USP. As stated on page 5 of the Commission's Order, this existing support funding consisted in part of Vectren's "Share the Warmth" program. Therefore, Vectren agreed to apply the annual \$500,000 of corporate Share the Warmth contributions to reduce the USP balance to be recovered via the Rider, as well as "funds collected from donors and matched by IGC and SIGECO in accordance with the terms of the "Share the Warmth" Program." (Commission Order, p. 5)

4. In 2004 and 2005(to date) Vectren (IGC and SIGECO) collected \$5,855 and \$8,422 from its customers and has matched these donations dollar for dollar. Vectren has historically encouraged donations via messages on customer bills and on some bill inserts. Absent increased marketing efforts, it is anticipated that the magnitude of donations would remain low.

5. In the aftermath of the Gulf hurricanes that have driven gas prices to all time highs, both government and community leaders in the State of Indiana have voiced concern regarding the ability of low income residents to heat their homes, and more assistance is being sought to help offset energy cost increases.

6. Vectren intends to engage in increased efforts to promote donations and will match those donations up to \$200,000. Rather than having these donations and the matching funds used to slightly reduce the Rider paid by all customers, Vectren has proposed that this year donations made to Share the Warmth and the associated matching funds be used to support incremental low income customer programs. The Settlement Parties agree with this proposal. The \$500,000 of corporate donations to Share the Warmth will continue to be used to reduce the Rider.

7. Because the Commission's Order approved the Settlement Parties' original agreement regarding the use of donations and matching dollars to

reduce the Rider, the Settlement Parties seek Commission approval of this slight modification of the Settlement Agreement.

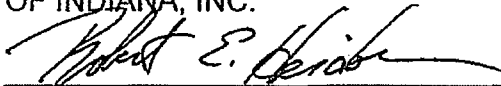
8. Given the unanimous agreement of the Settlement Parties, the Parties suggest that a Docket Entry approving their Joint Motion may be all that is required and is certainly in the public interest given current price conditions and the burden facing those customers least able to afford the dramatic price spike that has occurred this winter.

9. This Joint Motion only applies to Vectren's Share the Warmth donations and has no impact on Citizens Gas and Coke Utility's Universal Service Program.

WHEREFORE, the Settlement Parties respectfully request the Commission grant this Motion.

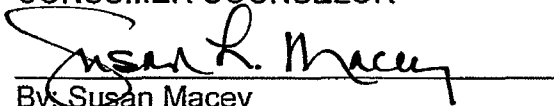
Respectfully submitted,

VECTREN ENERGY DELIVERY
OF INDIANA, INC.



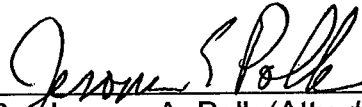
By: Robert E. Heidorn (Atty. #14264-49)
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Evansville, IN 47708

INDIANA OFFICE OF UTILITY
CONSUMER COUNSELOR



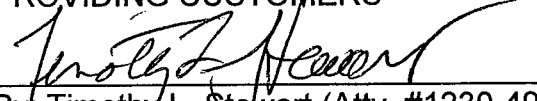
By: Susan Macey
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CITIZENS ACTION COALITION OF
INDIANA, INC.



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MANUFACTURING AND HEALTH
PROVIDING CUSTOMERS



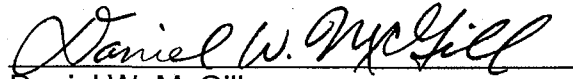
By: Timothy L. Stewart (Atty. #1230-49)
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Indianapolis, IN 46282-0003

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Joint Motion to Approve Amendment to Settlement Agreement was served on the following party to this proceeding by depositing a copy thereof in the United States mail, first class postage prepaid, addressed to:

Michael B. Cracraft
Hackman Hulett & Cracraft, LLP
One Indiana Square, Suite 2400
Indianapolis, Indiana 46204

this 9th day of December, 2005.


Daniel W. McGill