

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANA)
MICHIGAN POWER COMPANY (I&M))
FOR AN ORDER AUTHORIZING (1))
PRE-APPROVAL OF A CAPACITY)
PURCHASE AGREEMENT (CPA) AND (2))
TIME RECOVERY OF COSTS THROUGH)
I&M’S RESOURCE ADEQUACY RIDER)
(RAR) OF THE COST OF CAPACITY I&M)
WILL INCUR UNDER THE CPA.)

CAUSE NO. 45869

PETITION TO INTERVENE OF WABASH VALLEY POWER ASSOCIATION, INC.

Wabash Valley Power Association, Inc. d/b/a Wabash Valley Power Alliance (“Wabash Valley”), by counsel, pursuant to 170 IAC 1-1.1-11, petitions to intervene in and be made a party to the above-captioned proceeding before the Indiana Utility Regulatory Commission (“Commission”). In support of this Petition to Intervene, Wabash Valley states that:

1.

Wabash Valley is a mutual benefit non-profit organization existing pursuant to the Indiana Non-Profit Corporation Act, as amended. Wabash Valley’s principal place of business is located at 6702 Intech Boulevard, Indianapolis, Indiana 46278.
2.

Wabash Valley's members include rural electric membership corporations located generally in the northern part of the State of Indiana, which are Boone REMC, Carroll White REMC, Fulton County REMC, Hendricks Power Cooperative, Jasper County REMC, Jay County REMC, Kankakee Valley REMC, Kosciusko REMC, LaGrange County REMC, Marshall County REMC, Miami-Cass REMC, Newton County REMC, NineStar Connect, Noble REMC, Parke County REMC, Steuben County REMC, Tipmont REMC, United REMC, Wabash County REMC, and Warren County REMC. Wabash Valley's members also

include Citizens Electric Corporation, located in Missouri; Paulding-Putnam Electric Cooperative, Inc., located in Ohio (but only for that portion of Paulding-Putnam's service territory located in Indiana); and M.J.M. Electric Cooperative, Corn Belt Energy Corporation, and EnerStar Electric Cooperative, located in Illinois.¹

3. On March 30, 2023, Indiana Michigan Power Company (“I&M”) filed its Verified Petition in this Cause requesting Commission approval of its Capacity Purchase Agreement (“CPA”) with Rockland Capital related to its Montpelier Electric Generating Station and the timely recovery of costs for the full CPA term through RIM’s Resource Adequacy Rider of the cost of capacity I&M will incur under the Montpelier CPA.

4. Any determination by the Commission in this Cause will have a direct and substantial impact on Wabash Valley because I&M provides wholesale electric service to Wabash Valley. Wabash Valley purchases energy, capacity and ancillary services from I&M at cost based rates to serve its members in I&M’s transmission zone. Wabash Valley further has direct and substantial interest in this proceeding as it directly impacts Wabash Valley’s ability to provide reliable transmission service to its members.

5. Wabash Valley’s position and interest in this Cause will not be adequately represented by existing parties to the proceeding.

6. Wabash Valley’s intervention and participation in this proceeding will not unduly broaden the issue or otherwise burden the proceeding.

7. Wabash Valley understands that it is bound by the record as it stands at the time its Petition to Intervene is granted.

¹ Wabash Valley also has two members, J. Aron and Wabash Valley Energy Marketing, Inc. that are authorized by the Federal Energy Regulatory Commission to sell power into the wholesale market at market-based rates.

8. Names and addresses of Wabash Valley's representatives who are authorized to be served with pleadings, orders, docket entries and other documents filed in this matter are:

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

Respectfully submitted,

By: /s/ Jeremy L. Fetty
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Attorneys for Intervenor, Wabash Valley
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing Petition to Intervene of Wabash Valley Power Association, Inc. were served via the Court's electronic filing system this 6th day of April, 2023, to the following:

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