

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

JOINT PETITION OF INDIANA)
MICHIGAN POWER COMPANY (I&M))
AND AEP GENERATING COMPANY)
(AEG) FOR CERTAIN)
DETERMINATIONS WITH RESPECT)
TO THE COMMISSION'S)
JURISDICTION OVER THE RETURN)
OF OWNERSHIP OF ROCKPORT)
UNIT 2 AND FOR THE CREATION OF)
A SUBDOCKET TO ADDRESS)
ASSOCIATED ACCOUNTING AND)
RATEMAKING MATTERS, OR IN THE)
ALTERNATIVE ISSUANCE OF A)
CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY.)

CAUSE NO. 45546

PETITION TO INTERVENE OF SIERRA CLUB

Sierra Club, by counsel, respectfully requests, pursuant to 170 I.A.C. 1-1.1-11, that the Commission permits it to intervene and become a party to this Cause. In support of its Petition, Sierra Club would show the Commission:

1. Sierra Club is a public-interest organization with over 11,000 members in the State of Indiana. Sierra Club operates as a non-profit corporation and its principal office is 2101 Webster Street, Suite 1300, Oakland, California, 94612. Its national telephone number is (415) 977-5500. Sierra Club's Indiana office is located at 1100 West 42nd Street, Suite 218, Indianapolis, Indiana, 46208. Its Indiana office's telephone number is (317) 822-3750.

2. The name, address, and telephone number of counsel for Sierra Club is:

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With a courtesy copy to:
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Parties and Commission staff wishing to serve papers on counsel for Sierra Club in this Cause should use the address above.

3. Under the Commission's Rules, a petition to intervene must set out clearly and concisely facts showing the following:
 - a. The proposed intervenor's substantial interest in the subject matter of the proceeding.
 - b. The position of the proposed intervenor with respect to the matters involved in the proceeding.
 - c. Specific prayers for affirmative relief, if desired.
 - d. A prayer for leave to intervene and to be made a party to the proceeding.

170 I.A.C. 1-1.1-11(b)

4. The purpose of this proceeding is for Indiana Michigan Power Company ("I&M", "Petitioner" or "Company") and AEP Generating Company ("AEG") (collectively, "Petitioners") to request approval for certain matters regarding the acquisition of Rockport Unit 2, among other things.

5. Sierra Club includes among its members numerous individuals and families who are residential retail customers of the Company and have a substantial interest in the proceeding.

These members pay the Company's rates and charges for residential electric service, which this proceeding will impact if I&M gains approval. They also are dependent upon I&M facilities, equipment, and personnel for the reliability of their electric service, thus any changes would impact these members. Sierra Club seeks to intervene in this Cause to protect its and its members' substantial interests in the proceeding. Sierra Club will determine what positions it will take with regard to the matters presented in this proceeding after it has an opportunity to fully evaluate the Joint Petition and supporting testimony and engage in the discovery process.

6. Sierra Club has regularly appeared on behalf of its members before the Commission. No other party can adequately represent the substantial interest of Sierra Club and its members in this proceeding. Further, the addition of Sierra Club as a party to this Cause will not unduly burden the issues or otherwise burden the proceedings. Sierra Club understands that it is bound by all rulings and other matters of record before the time that this Petition is granted, and will take this case as it exists as of the date of intervention. Sierra Club will reach out to Petitioner and ask to be included in any discussions regarding the procedural schedule as it has not yet been set. Sierra Club will comply with any procedural schedule adopted by the Commission for this Cause.

7. For the foregoing reasons, Sierra Club respectfully requests that the Commission grant it leave to intervene and make Sierra Club a party to this proceeding. The undersigned Kathryn A. Watson has been duly authorized to file this Petition to Intervene with the Commission on behalf of Sierra Club.

Dated: May 19, 2021

Respectfully submitted,

/s/ Kathryn A. Watson

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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 19th day of May, 2021, to the following:

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