

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

APPLICATION OF DUKE ENERGY INDIANA, LLC)
FOR APPROVAL OF A CHANGE IN ITS FUEL COST)
ADJUSTMENT FOR ELECTRIC SERVICE, FOR)
APPROVAL OF A CHANGE IN ITS FUEL COST)
ADJUSTMENT FOR HIGH PRESSURE STEAM)
SERVICE, AND TO UPDATE MONTHLY)
BENCHMARKS FOR CALCULATION OF) CAUSE NO. 38707 FAC 127
PURCHASED POWER COSTS IN ACCORDANCE)
WITH INDIANA CODE §8-1-2-42, INDIANA CODE §8-)
1-2-42.3 AND VARIOUS ORDERS OF THE INDIANA)
UTILITY REGULATORY COMMISSION)

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 1915 West 18th Street, Suite C, Indianapolis, Indiana 46202. Its telephone number is (317) 205-3535.

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

Jennifer A. Washburn, Atty. No. 30462-49
Citizens Action Coalition
1915 West 18th Street, Suite C
Indianapolis, Indiana 46202
Phone: (317) 735-7764
Fax: (317) 290-3700
jwashburn@citact.org

Courtesy Copy to:
Reagan Kurtz
rkurtz@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 Duke Energy Indiana, LLC's ("Duke") request for approval of a change in Duke's fuel cost adjustments for both electric and high pressure steam services, among other things. CAC intends to review Duke's self-scheduling practice and the resulting ratepayer consequences, as well as any issues related to Duke's purchasing and storage of excessive amounts of coal.

5. CAC includes among its members numerous individuals and families who are residential customers of Duke and have a substantial interest in the proceeding. They pay Duke rates and charges for electricity, which this proceeding will impact if Duke gains approval of its request. CAC members are also dependent upon Duke facilities, equipment, DSM programs and personnel for the reliability of their electric service, thus any changes would impact them. CAC therefore has a substantial interest in this proceeding.

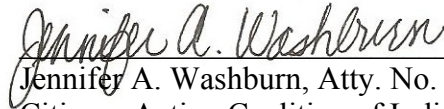
6. CAC has regularly appeared on behalf of their members before the Commission. No other party can adequately represent the substantial interests of the CAC's members.

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.

8. For the foregoing reasons, CAC respectfully requests that the Commission grant it leave to intervene and make CAC a party to this proceeding.

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

Respectfully submitted,

A handwritten signature in cursive script, reading "Jennifer A. Washburn".

Jennifer A. Washburn, Atty. No. 30462-49

Citizens Action Coalition of Indiana, Inc.

1915 W. 18th Street, Suite C

Indianapolis, Indiana 46202

Phone: (317) 735-7764

Fax: (317) 290-3700

jwashburn@citact.org

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing document was served upon the following via electronic mail, hard copies available upon request, this 2nd day of February, 2021:

Duke Energy Indiana, LLC

Melanie D. Price

Andrew J. Wells

melanie.price@duke-energy.com

andrew.wells@duke-energy.com

Indiana Office of Utility Consumer Counselor

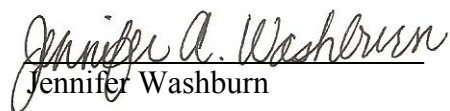
Lorraine Hitz-Bradley

Michael Eckert

lhitzbradley@oucc.in.gov

meckert@oucc.in.gov

infomgt@oucc.in.gov


Jennifer Washburn