

**STATE OF INDIANA
 INDIANA UTILITY REGULATORY COMMISSION**

**VERIFIED PETITION OF SOUTHERN INDIANA GAS)
 AND ELECTRIC COMPANY D/B/A CENTERPOINT)
 ENERGY INDIANA SOUTH (“CEI SOUTH”) FOR AN)
 ORDER: (1) ISSUING CEI SOUTH A CERTIFICATE)
 OF PUBLIC CONVENIENCE AND NECESSITY)
 (“CPCN”) TO PURCHASE AND ACQUIRE THROUGH)
 A BUILD TRANSFER AGREEMENT (“BTA”) A)
 SOLAR POWER ELECTRIC GENERATING)
 FACILITY IN PIKE COUNTY, INDIANA, THAT WILL)
 HAVE AN AGGREGATE NAMEPLATE CAPACITY)
 OF APPROXIMATELY 130 MEGAWATTS)
 ALTERNATING CURRENT (THE “PIKE COUNTY)
 SOLAR PROJECT”); (2) FINDING THE PIKE)
 COUNTY SOLAR PROJECT CONSTITUTES A)
 “CLEAN ENERGY PROJECT” UNDER IND. CODE)
 CH. 8-1-8.8; (3) APPROVING ASSOCIATED)
 RATEMAKING AND ACCOUNTING TREATMENT)
 FOR THE PIKE COUNTY SOLAR PROJECT UNDER)
 IND. CODE § 8-1-8.8-11; AND (4) APPROVING)
 CONFIDENTIAL TREATMENT FOR PRICING AND)
 OTHER COMMERCIAL TERMS OF THE BTA AND)
 RELATED CONFIDENTIAL INFORMATION.)**

CAUSE NO. 45754

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 telephone number of counsel for CAC is as follows:

Counsel of Record:

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
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With a copy to:

Reagan Kurtz
Citizens Action Coalition
1915 West 18th Street, Suite C
Indianapolis, Indiana 46202
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3. Parties and Commission staff wishing to serve papers on counsel for CAC in this Cause should use the addresses above.

4. The purpose of this proceeding is for Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (“CEI South,” “Petitioner,” or “Company”) to seek Commission approval of a certificate of public convenience and necessity (“CPCN”) to purchase and acquire a 130MW solar-generating facility in Pike County, Indiana, through a Build Transfer Agreement (“BTA”), among other things.

5. CAC includes among its members numerous individuals and families who are residential retail customers of CEI South and have a substantial interest in the proceeding. They pay CEI South rates and charges for electricity, which this proceeding will impact if CEI South gains approval of the CPCN. CAC members also are dependent upon CEI South’s facilities, equipment, programs, and personnel for the reliability of their utility services, thus any changes would impact them. This case will therefore impact CAC’s members for better or for worse. CAC 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 CAC’s members.

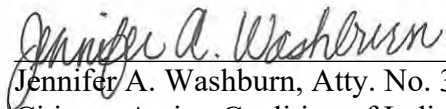
7. The addition of CAC as a party to this Cause will not unduly broaden the issues or otherwise burden the proceedings. CAC understands that it is bound by all rulings and other matters of record prior to the time that this Petition is granted, and we take the case as we find it

as of the date of intervention.

8. For the foregoing reasons, CAC respectfully requests that the Commission grants 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", is written over a horizontal line.

Jennifer A. Washburn, Atty. No. 30462-49
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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 12th day of August, 2022, to the following:

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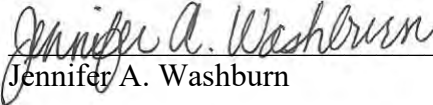
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