

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

FILED
JAN 25 2018
INDIANA UTILITY
REGULATORY COMMISSION

APPEAL BY MIKE MULLETT OF THE)
CONSUMER AFFAIRS DIVISION'S)
DECISION IN CASE NO. 122038) CAUSE NO. 45008
CONCERNING THE PROVISION OF)
ELECTRIC SERVICE BY DUKE ENERGY)
INDIANA LLC)

PETITION TO INTERVENE

Comes now LINDA HANDELSMAN pursuant to 170 IAC 1-1.1-11, and file my Petition to Intervene in the above-captioned proceeding and, in support thereof, state as follows:

1. I reside at 416 EAST FIRST STREET, BLOOMINGTON, INDIANA where I have resided since 2014.

2. I am a residential and net-metering customer of Duke Energy Indiana (Duke) and have a direct, immediate, and substantial interest in the subject matter of this proceeding, as required for intervention under 170 IAC 1-1.1-11. Specifically,

a. I pay Duke Energy Indiana ("Duke") rates and charges for residential electric service; I am also a Duke Net Metering customer as a result of the solar photovoltaic system which I installed and interconnected to the Duke distribution system in YEAR 2017.

b. The electric bill which I pay Duke each month is directly affected (reduced) by the credit that my solar photovoltaic system earns for me as a Net Metering customer.

c. I have seen and heard reported in the news media that, due to the passage of Senate Enrolled Act 309, Net Metering service to my residence will not be

terminated but instead continued ("grandfathered") through June 30, 2047, whether I continue to own and occupy my residence or I convey it to a "successor-in interest," provided only that my solar photovoltaic system is not removed or replaced in the meantime.

- d. This right to "grandfathered" Net Metering service is economically valuable to me and any successors in interest for my residence.
- e. However, to date, Duke has not updated its Net Metering tariff to incorporate the "grandfathering" provisions of SEA 309 and acknowledge this economically valuable property right.

3. 170 IAC 1-1.1-6 states that while the public is deemed a party in any proceeding in which the Office of Utility Consumer Counselor appears, "individuals or groups may be granted intervention and be represented by independent counsel." I seek to intervene to protect my interests as an individual in this cause because those interests are not and will not be adequately represented by the Office of Utility Consumer Counselor or any other existing party in this proceeding because they do not own my residence or my Net Metering "grandfathering" rights. The purpose of my intervention in this proceeding is to assert my property rights, to support Mr. Mullett in the assertion of his property rights, and to respond to any arguments against our property rights made by Duke, or relating to any other issue as required by law to be determined by the Commission, in this proceeding.

4. I am representing myself pro se and service of papers on me in this Cause should be directed to:

Linda Handelsman
416 East First Street
Bloomington, IN 47401
337-256-3480

ibake@pobox.com

5. My addition as a party to this Cause will not unduly broaden the issues or otherwise burden the proceedings. Further, I understand that I am bound by all rulings and other matters of record prior to the time I am made a party of record.

6. For the foregoing reasons, I respectfully request that the Commission grant me leave to intervene as a party to this proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads "Linda Handelsman".

Linda Handelsman
416 East First Street
Bloomington, IN 47401
337-256-3480
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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 23rd day of January, 2018, to the following:

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Respectfully submitted,

Linda Handelsman

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