

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

**IN THE MATTER OF THE VERIFIED PETITION OF )  
INDIANA MICHIGAN POWER COMPANY FOR )  
APPROVAL OF AN ADJUSTMENT TO ITS RATES )  
THROUGH ITS DEMAND SIDE MANAGEMENT )  
AND ENERGY EFFICIENCY PROGRAM COST )  
RIDER COMMENCING WITH THE BILLING )  
MONTH OF JANUARY 2016 AND FOR APPROVAL )  
OF ALTERNATIVE REGULATORY PLAN FOR )  
DEMAND SIDE MANAGEMENT (DSM) AND )  
ENERGY EFFICIENCY (EE) PROGRAMS FOR 2016 ) CAUSE NO. 43827 DSM 5  
AND ASSOCIATED ACCOUNTING AND )  
RATEMAKING MECHANISMS, INCLUDING )  
TIMELY RECOVERY THROUGH I&M'S DSM/EE )  
PROGRAM COST RIDER OF ASSOCIATED COSTS, )  
INCLUDING ALL PROGRAM COSTS, NET LOST )  
REVENUE, SHAREHOLDER INCENTIVES AND )  
CARRYING CHARGES, DEPRECIATION ON )  
CAPITAL EXPENDITURES AND OPERATIONS )  
AND MAINTENANCE EXPENSE. )**

**JOINT MOTION TO EXTEND REMAINING**  
**POST-HEARING FILING DEADLINES**

**(Agreed)**

The Indiana Office of Utility Consumer Counselor ("OUCC"), Citizens Action Coalition ("CAC"), and the I&M Industrial Group ("Industrial Group") (collectively, "Joint Movants") jointly request a two-day extension of the remaining post-hearing filing deadlines in this proceeding, extending the time for Joint Movants to respond to Indiana Michigan Power Company's ("I&M") Proposed Order until March 4, 2016, with I&M's final reply due on March 11, 2016.

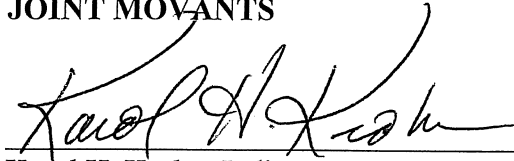
Before filing this Joint Motion, the undersigned counsel for the OUCC obtained I&M's consent to this request. I&M reiterated its desire to obtain a final order from the Indiana Utility Regulatory Commission ("Commission") by April 27, 2016.

The undersigned counsel for the OUCC was directed and authorized to execute and file this motion on behalf of all Joint Movants, including the Industrial Group (represented by attorney Joseph P. Rompala with the law firm of Lewis Kappes P.C.) and CAC (represented by its in-house counsel, Jennifer A. Washburn).

Accordingly, the Joint Movants request that the Commission extend the remaining post-hearing filing deadlines to March 4, 2016 for Joint Movants and March 11, 2016 for I&M.

Respectfully submitted,

**JOINT MOVANTS**



Karol H. Krohn, Indiana Attorney No. 5566-82  
Deputy Consumer Counselor  
115 West Washington Street, Suite 1500 South Tower  
Indianapolis, Indiana 46204  
Direct: 317-233-3235  
Main Phone: 317-232-2494 FAX: 317-232-5923  
[kkrohn@oucc.in.gov](mailto:kkrohn@oucc.in.gov) [infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)

COUNSEL OF RECORD FOR THE INDIANA  
OFFICE OF UTILITY CONSUMER COUNSELOR

-and-

Jennifer A. Washburn, Indiana Attorney No. 30462-49  
603 East Washington Street, Suite 502  
Indianapolis, Indiana 46204  
Phone: 317-735-7764 FAX: 317-290-3700  
[jwashburn@citact.org](mailto:jwashburn@citact.org)

COUNSEL FOR CITIZENS ACTION COALITION

-and-

Timothy L. Stewart, Indiana Attorney No. 2189-49  
Joseph P. Rompala, Indiana Attorney No. 25078-49  
LEWIS & KAPPES, P.C.  
One American Square, Suite 2500  
Indianapolis, Indiana 46282-0003  
Phone: 317-639-1210 FAX: 317-639-4882  
[TStewart@Lewis-Kappes.com](mailto:TStewart@Lewis-Kappes.com); [JRompala@Lewis-Kappes.com](mailto:JRompala@Lewis-Kappes.com)

COUNSEL FOR THE I&M INDUSTRIAL GROUP

## CERTIFICATE OF SERVICE

This is to certify that a copy of the *Joint Motion to Extend Remaining Post-Hearing Filing Deadlines* has been served upon the following counsel of record in the captioned proceeding by electronic service, on March 2, 2016.

Teresa Nyhart  
Jeffrey M. Peabody  
BARNES & THORNBURG LLP  
11 South Meridian Street  
Indianapolis, Indiana 46204  
[tnyhart@btlaw.com](mailto:tnyhart@btlaw.com)  
[jpeabody@btlaw.com](mailto:jpeabody@btlaw.com)

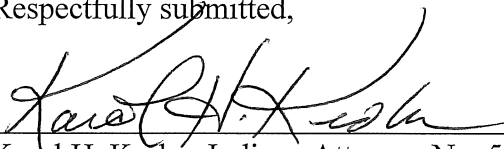
Jennifer A. Washburn  
CITIZENS ACTION COALITION  
603 East Washington Street  
Suite 502  
Indianapolis, Indiana 46204  
[jwashburn@citact.org](mailto:jwashburn@citact.org)

*Courtesy Copy to:*  
American Elec. Power Svc. Corp.  
Matthew Satterwhite  
1 Riverside Plaza, 29th Floor  
Columbus, OH 43215  
[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)

Timothy L. Stewart  
Joseph P. Rompala  
LEWIS & KAPPES, P.C.  
One American Square, Suite 2500  
Indianapolis, Indiana 46282-0003  
[TStewart@Lewis-Kappes.com](mailto:TStewart@Lewis-Kappes.com)  
[JRompala@Lewis-Kappes.com](mailto:JRompala@Lewis-Kappes.com)

*Courtesy Copies to:*  
[ATyler@Lewis-Kappes.com](mailto:ATyler@Lewis-Kappes.com)  
[ETennant@Lewis-Kappes.com](mailto:ETennant@Lewis-Kappes.com)

Respectfully submitted,



Karol H. Krohn, Indiana Attorney No. 5566-82  
Deputy Consumer Counselor

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR  
PNC Center  
115 W. Washington Street  
Suite 1500 South Tower  
Indianapolis, IN 46204  
Direct Phone: 317-233-3235  
Main Phone: 317-232-2404  
Facsimile: 317-232-5923  
[infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)