

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS POWER &)
LIGHT COMPANY (“IPL”), AN INDIANA)
CORPORATION, FOR (1) ISSUANCE OF A)
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY FOR THE CONSTRUCTION OF A)
COMBINED CYCLE GAS TURBINE GENERATION)
FACILITY (“CCGT”); (2) ISSUANCE OF A)
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY TO CONVERT COAL FIRED)
GENERATING FACILITIES TO GAS; (3) APPROVAL)
OF THE CONSTRUCTION OF TRANSMISSION,)
PIPELINE AND OTHER FACILITIES; (4))
APPROVAL OF ASSOCIATED RATEMAKING AND)
ACCOUNTING TREATMENT; (5) AUTHORITY TO)
TIMELY RECOVER 80% OF THE COSTS)
INCURRED DURING CONSTRUCTION AND)
OPERATION OF THE GAS REFUELING PROJECT)
THROUGH IPL’S ENVIRONMENTAL)
COMPLIANCE COST RECOVERY ADJUSTMENT;)
(6) AUTHORITY TO CREATE REGULATORY)
ASSETS TO RECORD (A) 20% OF THE REVENUE)
REQUIREMENT FOR COSTS, INCLUDING,)
CAPITAL, OPERATING, MAINTENANCE,)
DEPRECIATION TAX AND FINANCING COSTS ON)
THE REFUELING PROJECT WITH CARRYING)
COSTS AND (B) POST-IN-SERVICE ALLOWANCE)
FOR FUNDS USED DURING CONSTRUCTION,)
BOTH DEBT AND EQUITY, AND DEFERRED)
DEPRECIATION ASSOCIATED WITH THE)
PROJECTS UNTIL SUCH COSTS ARE REFLECTED)
IN RETAIL ELECTRIC RATES; AND (7) ISSUANCE)
OF A NECESSITY CERTIFICATE TO TRANSPORT)
NATURAL GAS IN INDIANA)

CAUSE NO. 44339

SUMMIT POWER GROUP, LLC AND CONSUMER PARTIES’ REPLY

Summit Power Group, LLC (“Summit”) and all consumer groups in this Cause, the Indiana Office of Utility Consumer Counselor, the IPL Industrial Group, and the Citizens Action Coalition, hereby stand by their initial Motion to Strike, filed on March 4, 2014.

The undersigned counsel states she has the authority to represent the OUCC, the IPL-IG and the CAC's position as reflected above.

Respectfully submitted,

LEWIS & KAPPES, P.C.

/s/ Anne E. Becker
Anne E. Becker, Atty No. 14185-03

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that copies of the foregoing document have been served upon the following by email, this 12th day of March, 2014:

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/s/ Anne E. Becker

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