

**STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION**

**VERIFIED PETITION OF INDIANA MICHIGAN POWER)
COMPANY (I&M), AN INDIANA CORPORATION, FOR)
APPROVAL OF A CLEAN ENERGY PROJECT AND)
QUALIFIED POLLUTION CONTROL PROPERTY AND)
FOR ISSUANCE OF CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY FOR USE OF CLEAN)
COAL TECHNOLOGY; FOR ONGOING REVIEW; FOR) CAUSE NO. 44871
APPROVAL OF ACCOUNTING AND RATEMAKING,)
INCLUDING THE TIMELY RECOVERY OF COSTS)
INCURRED DURING CONSTRUCTION AND OPERATION)
OF SUCH PROJECT THROUGH I&M'S CLEAN COAL)
TECHNOLOGY RIDER; FOR APPROVAL OF)
DEPRECIATION PROPOSAL FOR SUCH PROJECT; AND)
FOR AUTHORITY TO DEFER COSTS INCURRED DURING)
CONSTRUCTION AND OPERATION, INCLUDING)
CARRYING COSTS, DEPRECIATION, TAXES,)
OPERATION AND MAINTENANCE AND ALLOCATED)
COSTS, UNTIL SUCH COSTS ARE REFLECTED IN THE)
CLEAN COAL TECHNOLOGY RIDER OR OTHERWISE)
REFLECTED IN I&M'S BASIC RATES AND CHARGES.)**

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 603 East Washington Street, Suite 502, Indianapolis, Indiana 46204-2692. Its telephone number is (317) 205-3535.

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

Jennifer A. Washburn, Atty. No. 30462-49
Citizens Action Coalition
603 East Washington Street, Suite 502
Indianapolis, Indiana 46204
Phone: (317) 735-7764
Fax: (317) 290-3700
jwashburn@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 Indiana Michigan Power Company's ("I&M," "Petitioner," or "Company") request for approval of a project and a certificate of public convenience and necessity and an associated accounting and ratemaking mechanism, among other things.

5. CAC includes among its members numerous individuals and families who are residential retail customers of I&M and have a substantial interest in the proceeding. They pay I&M rates and charges for residential electric service, which this proceeding will impact if I&M gains approval of spending for this project. They also are dependent upon I&M facilities, equipment, DSM programs and personnel for the reliability of their electric service, thus any changes would impact them. Also, this petition requesting approval of the Rockport Unit 2 project that impacts future I&M resource choices, including an objective evaluation of the full potential of I&M's alternative resource choices, will impact CAC's members for better or for worse. 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.

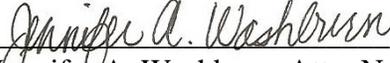
7. The addition of CAC as a party to this Cause will not unduly broaden the issues or

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 grants it leave to intervene and make CAC a party to this proceeding.

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

Respectfully submitted,


Jennifer A. Washburn, Atty. No. 30462-49
Citizens Action Coalition of Indiana, Inc.
603 East Washington Street, Suite 502
Indianapolis, Indiana 46204
Phone: (317) 735-7764
Fax: (317) 290-3700
jwashburn@citact.org

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail or U.S.

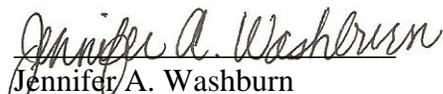
Mail, first class postage prepaid, this 25th day of October, 2016, to the following:

Teresa Morton Nyhart
Jeffrey M. Peabody
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204
tnyhart@btlaw.com
jpeabody@btlaw.com

courtesy copy to:

Matthew Satterwhite
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
mjsatterwhite@aep.com

A. David Stippler
Randall Helmen
Lorraine Hitz-Bradley
Indiana Office of Utility Consumer Counselor
115 W. Washington Street, Suite 1500 South
Indianapolis, Indiana 46204
dstippler@oucc.IN.gov
rhelmen@oucc.IN.gov
lhitzbradley@oucc.in.gov
infomgt@oucc.IN.gov


Jennifer A. Washburn
Citizens Action Coalition