

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND. CODE)
§§ 8-1-2-42.7, 8-1-2-61 AND, IND. CODE § 8-1-2.5-6)
FOR (1) AUTHORITY TO MODIFY ITS RATES AND)
CHARGES FOR ELECTRIC UTILITY SERVICE)
THROUGH A PHASE IN OF RATES; (2) APPROVAL OF)
NEW SCHEDULES OF RATES AND CHARGES,)
GENERAL RULES AND REGULATIONS, AND) CAUSE NO. 45159
RIDERS; (3) APPROVAL OF REVISED COMMON AND)
ELECTRIC DEPRECIATION RATES APPLICABLE TO)
ITS ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE ACCOUNTING)
RELIEF; AND (5) APPROVAL OF A NEW SERVICE)
STRUCTURE FOR INDUSTRIAL RATES)
)

**PETITION TO INTERVENE OF
INDIANA COALITION FOR AFFORDABLE AND RELIABLE ELECTRICITY**

Pursuant to 170 I.A.C. 1-1.1-11, the Indiana Coalition for Affordable and Reliable Electricity (“ICARE”), by counsel, respectfully petitions the Commission for permission to intervene in the above-captioned proceeding. In support of this Petition, ICARE states as follows:

1. Petitioner (“NIPSCO”) initiated this proceeding on October 31, 2018 instituting a rate case and requesting, among other things, approval of revised depreciation rates associated with the early retirement of its coal fleet pursuant to its recently-filed Integration Resource Plan.

2. ICARE’s members include companies that support reliable, affordable electric generation sources, and coal suppliers to NIPSCO’s units. Attachment A to this Petition is a list of the members of ICARE. Should additional members join ICARE, Attachment A will be revised to reflect such additions as they occur.

3. NIPSCO's proposal to retire coal-fired generating assets in its pending Integrated Resource Plan and to revise rates to reflect the early retirements of those assets affects the ICARE members' substantial economic and policy interests in the continued operation of the Schahfer generating units.

4. The intervention of ICARE in this proceeding will not unduly broaden the issues before the Commission, and ICARE understands it will be bound by the record and procedural schedule as it stands at the time its Petition to Intervene is granted.

5. ICARE is not adequately represented by any other party to this proceeding.

6. This Petition to Intervene is filed more than five (5) days prior to the evidentiary hearing on the merits in this proceeding.

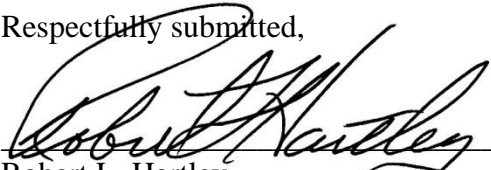
7. The attorneys representing ICARE in this proceeding are:

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The above-named attorneys are authorized to accept service of pleadings and other documents in this proceeding on behalf of ICARE.

WHEREFORE, the members of ICARE request the Commission grant this Petition to Intervene and that ICARE be made a party to this proceeding with respect to all matters.

Respectfully submitted,



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**Attorneys for Indiana Coalition for
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ATTACHMENT A

Energy Policy Network
Alliance Coal, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail this 25th day of January, 2019, to the following:

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