

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC FOR APPROVAL PURSUANT)
TO IND. CODE §§ 8-1-2-42(a), 8-1-8.8-11, AND TO THE)
EXTENT NECESSARY IND. CODE § 8-1-2.5-6, OF A) CAUSE NO. 45195
RENEWABLE ENERGY POWER PURCHASE)
AGREEMENT WITH JORDAN CREEK WIND FARM LLC,)
INCLUDING TIMELY COST RECOVERY.)

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 seeking approval and associated cost recovery for a wind power purchase agreement that it has selected pursuant to the action plan described in its 2018 Integrated Resource Plan (“IRP”)

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. ICARE is an active intervenor in NIPSCO’s current rate proceeding and has submitted comments on NIPSCO’s 2018 IRP. NIPSCO’s proposal to retire coal-fired generating assets in the pending IRP and to replace those assets with renewable generation sources, including the power purchase agreement that is the subject of this proceeding, 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:

Meghan E. Griffiths*, Texas State Bar No. 24045983 Jennifer A. Ferri*, Texas State Bar No. 24065224 Jackson Walker LLP 100 Congress Ave., Suite 1100 Austin, Texas 78701 T: (512) 236-2362; (512) 236-2029 F: (512) 391-2163; (512) 391-2129 mgriffiths@jw.com jferri@jw.com * Temporary admission pending	Local Counsel: Robert L. Hartley Indiana State Bar No. 7563-49 Frost Brown Todd LLC 201 North Illinois St., Suite 1900 Indianapolis, Indiana 46244 T: (317) 237-3949 F: (317) 237-3900 rhartley@fbtlaw.com
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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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ATTACHMENT A

Energy Policy Network
Alliance Coal, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail this 20th day of March, 2019, to the following:

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