

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT )  
COMPANY ("IPL") FOR (1) AUTHORITY TO INCREASE )  
RATES AND CHARGES FOR ELECTRIC UTILITY )  
SERVICE, (2) APPROVAL OF REVISED DEPRECIATION )  
RATES, ACCOUNTING RELIEF, INCLUDING UPDATE )  
OF THE MAJOR STORM DAMAGE RESTORATION )  
RESERVE ACCOUNT, APPROVAL OF A VEGETATION )  
MANAGEMENT RESERVE ACCOUNT, INCLUSION IN ) CAUSE NO. 45029  
BASIC RATES AND CHARGES THE COSTS OF )  
CERTAIN PREVIOUSLY APPROVED PROJECTS, )  
INCLUDING THE EAGLE VALLEY COMBINED CYCLE )  
GAS TURBINE, THE NATIONAL POLLUTION )  
DISCHARGE ELIMINATION SYSTEM AND COAL )  
COMBUSTION RESIDUALS COMPLIANCE PROJECTS, )  
RATE ADJUSTMENT MECHANISM PROPOSALS, COST )  
DEFERRALS, AMORTIZATIONS, AND (3) APPROVAL )  
OF NEW SCHEDULES OF RATES, RULES AND )  
REGULATIONS FOR SERVICE. )

**PETITION TO INTERVENE OF INDIANA COALITION FOR HUMAN SERVICES**

The Indiana Coalition for Human Services ("ICHS"), 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, ICHS would show the Commission:

1. ICHS is a statewide not-for-profit corporation under the laws of the State of Indiana and its principal office is located at 3901 North Meridian Street, Suite 306, Indianapolis, Indiana 46208. Its telephone number is (317) 715-6719.

2. The name, address and telephone number of counsel for ICHS is as follows:

Margo Tucker, Atty. No. 34803-49  
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3. Parties and Commission staff wishing to serve papers on counsel for ICHS in this Cause should use the address above.

4. The purpose of this proceeding includes Indianapolis Power & Light Company (“IPL,” “Petitioner,” or “Company”) request for approval to increase its rates and charges, among other things.

5. ICHS has a substantial interest in the subject of this proceeding. The mission of ICHS is to promote public policy that betters the lives of those at risk and in need. ICHS is Indiana’s unified voice for educating, advocating and mobilizing in support of policies that empower Hoosiers striving to reach their full potential. ICHS advocates for: the inclusion of individuals and human service groups in priority setting, policy formulation, program development and evaluation; the development of comprehensive human services programming; and the delivery of quality human services programming in our state and local communities. The coalition’s members voluntarily join together to communicate that all citizens are valued and to ensure that human needs are provided. ICHS recognizes that low income communities pay a high proportion of their incomes on energy and that higher utility rates and charges disproportionately affect Indiana’s most vulnerable populations. Therefore, ICHS, its members, and the target populations they serve will be affected for better or worse by the request by IPL to raise rates and charges for its customers. ICHS therefore has a substantial interest in this proceeding.

6. ICHS has appeared before the Commission in Cause No.’s 44576 and 44967. No other party can adequately represent the substantial interests of ICHS’s members.

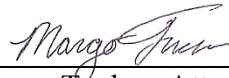
7. The addition of ICHS as a party to this Cause will not unduly broaden the issues or

otherwise burden the proceedings. ICHS 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, ICHS respectfully requests that the Commission grants it leave to intervene and make ICHS a party to this proceeding.

The undersigned Margo Tucker has been duly authorized to file this petition to intervene with the Commission on behalf of ICHS.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene has been served upon the following counsel electronically or via regular mail this 9th day of February, 2018:

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