

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

SUBDOCKET FOR REVIEW OF SOUTHERN)
INDIANA GAS AND ELECTRIC COMPANY D/B/A)
CENTERPOINT ENERGY INDIANA SOUTH (“CEI) CAUSE NO. 38708 FAC 137-S1
SOUTH”) 2021 EXTENDED FORCED OUTAGE AT)
CULLEY 3 GENERATING UNIT AND ITS)
RELATED IMPACT ON FUEL PROCUREMENT)
AND FUEL COSTS)

**CENTERPOINT ENERGY INDIANA SOUTH
INDUSTRIAL GROUP’S PETITION TO INTERVENE**

The CenterPoint Energy Indiana South Industrial Group (“CEIS Industrial Group” or “Industrial Group”), by counsel, files its Petition to Intervene in the above-captioned proceeding pursuant to 170 IAC 1-1.1-11 and, in support thereof, states the following:

1. The Industrial Group is a collection of industrial energy consumers, including the companies listed on Appendix “A” which is attached hereto and made a part hereof, who are retail customers of Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (“CEI South”). Additional members may be joining the Industrial Group for the purpose of this proceeding and in such event the Commission and other parties will be notified.
2. As industrial customers who either currently purchase retail electric service from CEI South, the members of the Industrial Group have a direct, immediate and substantial interest in the subject matter of this proceeding.
3. Because of their present and potential future interests, members of the Industrial Group seek to intervene to protect them, and the interests of members of the Industrial Group are not and will not be adequately represented by existing parties in this proceeding.

4. Members of the Industrial Group believe that as a public utility CEI South should provide electric service in an efficient, dependable and economic manner, consistent with sound management, and has a duty and the responsibility to make every reasonable effort to do so.

5. Because of the importance of energy in their industrial operations, members of the Industrial Group are substantially affected by the cost of electric service provided by CEI South. The intervention by members of the Industrial Group in this proceeding is for the purpose of responding to those issues raised by this subdocket or required by law to be determined by the Commission in this proceeding and all issues related thereto.

6. Members of the Industrial Group, therefore, have a substantial interest in the subject matter of this proceeding and their intervention will not unreasonably broaden the issues involved in this proceeding. The Industrial Group understands it is bound by the record as it stands at the time the petition to intervene is granted.

7. The addresses of the parties requesting intervention in this proceeding are set forth on Appendix "A" attached hereto and made a part hereof.

8. The attorneys representing the members of the Industrial Group in this proceeding are:

Anne E. Becker, Atty. No. 14185-03
Tabitha L. Balzer, Atty. No. 29350-53
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The above-named attorneys are authorized to accept service of papers in this proceeding on behalf of the members of the Industrial Group.

9. This Petition to Intervene is being filed more than five (5) days prior to any date set for the initial evidentiary hearing in this proceeding.

WHEREFORE, the members of the Industrial Group, as set forth on Appendix "A" attached hereto and made a part hereof, respectfully request that they be granted leave to intervene and be made parties to the above-captioned proceeding.

Respectfully submitted,

LEWIS KAPPES, P.C.

/s/ Anne E. Becker

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

Tabitha L. Balzer, Atty. No. 29350-53

APPENDIX “A”

CONSOLIDATED GRAIN AND BARGE

PO Box 289

Mt. Vernon, Indiana 47620

COUNTRYMARK REFINING AND LOGISTICS, LLC

1200 Refinery Road

Mt. Vernon, Indiana 47620

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing document have been served upon the following via electronic mail, this 28th day of February, 2023:

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