

**STATE OF INDIANA  
INDIANA UTILITY REGULATORY COMMISSION**

**FILED**

PETITION OF INDIANA MICHIGAN POWER COMPANY, )  
AN INDIANA CORPORATION, FOR (1) AUTHORITY TO )  
INCREASE ITS RATES AND CHARGES FOR ELECTRIC )  
UTILITY SERVICE THROUGH A PHASE IN RATE )  
ADJUSTMENT; (2) APPROVAL OF: REVISED )  
DEPRECIATION RATES; ACCOUNTING RELIEF; )  
INCLUSION IN BASIC RATES AND CHARGES OF )  
QUALIFIED POLLUTION CONTROL PROPERTY, )  
CLEAN ENERGY PROJECTS AND COST OF BRINGING )  
I&M'S SYSTEM TO ITS PRESENT STATE OF )  
EFFICIENCY; RATE ADJUSTMENT MECHANISM )  
PROPOSALS; COST DEFERRALS; MAJOR STORM )  
DAMAGE RESTORATION RESERVE AND )  
DISTRIBUTION VEGETATION MANAGEMENT )  
PROGRAM RESERVE; AND AMORTIZATIONS; AND (3) )  
FOR APPROVAL OF NEW SCHEDULES OF RATES, )  
RULES AND REGULATIONS. )

September 27, 2017

**INDIANA UTILITY  
REGULATORY COMMISSION**

**CAUSE NO. 44967**

**PETITION TO INTERVENE OF  
INDIANA COMMUNITY ACTION ASSOCIATION, INC.**

The Indiana Community Action Association, Inc. ("INCAA"), 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, INCAA would show the Commission:

1. INCAA is a statewide not-for-profit corporation under the laws of the State of Indiana and its principal office is located at 1845 West 18th Street, Indianapolis, Indiana 46202. Its telephone number is (317) 638-4232.

2. The name, address and telephone number of counsel for INCAA 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  
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[jwashburn@citact.org](mailto:jwashburn@citact.org)

3. Parties and Commission staff wishing to serve papers on counsel for INCAA 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 to increase its rates and charges, among other things.

5. INCAA has a substantial interest in the subject of this proceeding. INCAA's members or network is comprised of Indiana's twenty-two (22) Community Action Agencies (CAAs), which serve all of Indiana's ninety-two (92) counties. Its mission is to help the state's Community Action Agencies address the conditions of poverty and it serves as an advocate and facilitator of policy, planning and programs to create solutions and share responsibility as leaders in the war against poverty. INCAA's members administer numerous programs that serve the poor throughout Indiana, including the Federal Low-Income Home Energy Assistance Program ("LIHEAP") and Weatherization Assistance Program ("WAP"). Therefore, INCAA, its members, and the target population they serve will be affected for better or worse by the request by I&M to raise rates and charges for its customers. INCAA therefore has a substantial interest in this proceeding.

6. INCAA has appeared before the Commission in Cause Nos. 44576 and 43669. No other party can adequately represent the substantial interests of INCAA's members.

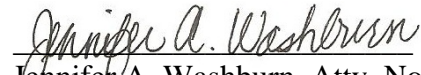
7. The addition of INCAA as a party to this Cause will not unduly broaden the issues or otherwise burden the proceedings. INCAA understands that it is bound by all rulings and other matters of record prior to the time that this Petition is granted, and we take the case as we find it as of the date of intervention.

8. For the foregoing reasons, INCAA respectfully requests that the Commission grants

it leave to intervene and make INCAA 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 INCAA.

Respectfully submitted,

A handwritten signature in cursive script, reading "Jennifer A. Washburn".

Jennifer A. Washburn, Atty. No. 30462-49  
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## **CERTIFICATE OF SERVICE**

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

Mail, first class postage prepaid, this 27<sup>th</sup> day of September, 2017, to the following:

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