

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

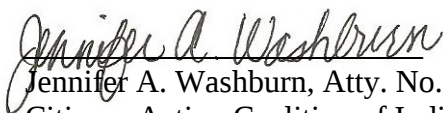
PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY FOR AUTHORITY TO)
MODIFY ITS RATES AND CHARGES FOR)
ELECTRIC UTILITY SERVICE AND FOR)
APPROVAL OF: (1) CHANGES TO ITS)
ELECTRIC SERVICE TARIFF INCLUDING A)
NEW SCHEDULE OF RATES AND CHARGES)
AND CHANGES TO THE GENERAL RULES)
AND REGULATIONS AND CERTAIN RIDERS;)
(2) REVISED DEPRECIATION ACCRUAL) CAUSE NO. 45159
RATES; (3) INCLUSION IN ITS BASIC RATES)
AND CHARGES OF THE COSTS ASSOCIATED)
WITH CERTAIN PREVIOUSLY APPROVED)
QUALIFIED POLLUTION CONTROL)
PROPERTY, CLEAN COAL TECHNOLOGY,)
CLEAN ENERGY PROJECTS AND FEDERALLY)
MANDATED COMPLIANCE PROJECTS; AND)
(4) ACCOUNTING RELIEF TO ALLOW NIPSCO)
TO DEFER, AS A REGULATORY ASSET OR)
LIABILITY, CERTAIN COSTS FOR RECOVERY)
IN A FUTURE PROCEEDING.)

FILED
September 13, 2019
INDIANA UTILITY
REGULATORY COMMISSION

**SUBMISSION OF REPLY BRIEF OF INDIANA OFFICE OF UTILITY CONSUMER
COUNSELOR, CITIZENS ACTION COALITION OF INDIANA, AND SIERRA CLUB**

The Indiana Office of Utility Consumer Counselor (“OUCC”), Citizens Action Coalition of Indiana (“CAC”), and Sierra Club, by counsel, respectfully submit their Reply Brief in the above referenced Cause to the Indiana Utility Regulatory Commission.

Respectfully submitted on behalf of the OUCC,
CAC, and Sierra Club,



Jennifer A. Washburn, Atty. No. 30462-49
Citizens Action Coalition of Indiana, Inc.

1915 W. 18th Street, Suite C
Indianapolis, Indiana 46202

Phone: (317) 735-7764

Fax: (317) 290-3700

jwashburn@citact.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following counsel electronically or via regular mail this 13th day of September, 2019:

William I. Fine
Abby R. Gray
Randall C. Helmen
Jeffrey M. Reed
Office of Utility Consumer Counselor
115 W. Washington Street
Suite 1500 South
Indianapolis, Indiana 46204
wfine@oucc.in.gov
agray@oucc.in.gov
rhelmen@oucc.in.gov
infomgt@oucc.in.gov
jreed@oucc.in.gov

Bette J. Dodd
Todd A. Richardson
Joseph P. Rompala
Lewis & Kappes, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282
bdodd@lewis-kappes.com
trichardson@lewis-kappes.com
jrompala@lewis-kappes.com

Nikki G. Shoultz
Kristina Kern Wheeler
Jeffery A. Earl
Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis, Indiana 46204
nshoultz@boselaw.com
kwheeler@boselaw.com
jearl@boselaw.com

Barry A. Naum
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, Pennsylvania 17050
bnaum@spilmanlaw.com

Anne E. Becker
Lewis & Kappes, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282
abecker@lewis-kappes.com

James W. Brew
Stone Mattheis Xenopoulos & Brew
1025 Thomas Jefferson St., NW,
9th Floor, West, Tower,
Washington, DC 20007
jbrew@smxblaw.com

Robert M. Glennon
Robert Glennon & Assoc., P.C.
3697 N. Co. Rd. 500 E
Danville, Indiana 46122
robertglennonlaw@gmail.com

Kathryn A. Watson
Cantrell Strenski & Mehringer, LLP
150 West Market Street, Suite 800
Indianapolis, Indiana 46204
kwatson@csmlawfirm.com

Casey Roberts
1536 Wynkoop Street, Suite 312
Denver, Colorado 80202
casey.roberts@sierraclub.org

Tony Mendoza
2101 Webster St., 13th Floor
Oakland, California 94612
tony.mendoza@sierraclub.org

Eric E. Kinder
Spilman Thomas & Battle, PLLC
300 Kanawha Boulevard, East
P.O. Box 273
Charleston, West Virginia 25321
ekinder@spilmanlaw.com

Claudia J. Earls
NiSource Corporate Services - Legal
150 West Market Street, Suite 600
Indianapolis, Indiana 46204
cjearls@nisource.com

Joshua A. Claybourn
Chad Sullivan
Jackson Kelly PLLC
221 NW Fifth Street
P.O Box 1507
Evansville, Indiana 47706
jclaybourn@jacksonkelly.com
cjsullivan@jacksonkelly.com

Meghan E. Griffiths
Jennifer A. Ferri
Jackson Walker LLP
100 Congress Avenue, Suite 1100
Austin, Texas 78701
mgriffiths@jw.com
jferri@jw.com

Dennis Rackers
275 E. 125th Place
Crown Point, Indiana 46307
dsrasdf@gmail.com

James A.L. Buddenbaum
Aleasha J. Boling
Parr Richey Frandsen Patterson Kruse LLP
251 N. Illinois Street, Suite 1800
Indianapolis, IN 46204
jbuddenbaum@parrlaw.com
aboling@parrlaw.com

Anthony Alfano
1301 Texas St., 2nd Floor
Gary, IN 46402
aalfano@usw.org

Nicholas Kile
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204
nicholas.kile@btlaw.com

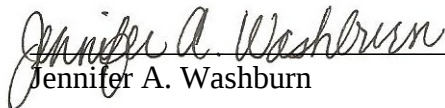
Michael Hooper
Erin E. Whitehead
Northern Ind. Public Service Co. LLC
150 W. Market Street, Suite 600
Indianapolis, IN 46204
mhooper@nisource.com
ewhitehead@nisource.com

Robert L. Hartley
Carly J. Tebelman
Frost Brown Todd LLC
201 N. Illinois St., Suite 1900
P.O. Box 44961
Indianapolis, IN 46244-0961
rhartley@fbtlaw.com
ctebelman@fbtlaw.com

Alan M. Hux
Stettinus & Hollister, LLP
One Indiana Square, Suite 3500
Indianapolis, Indiana 46204
ahux@taftlaw.com

Shaw R. Friedman
Friedman & Associates, PC
705 Lincolnway
LaPorte, Indiana 46350
Sfriedman.associates@frontier.com

Keith L. Beall
Beall & Beall
13238 Snow Owl Dr., Ste. A
Carmel, IN 46033
kbeall@indy.rr.com


Jennifer A. Washburn