

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA)
PUBLIC SERVICE COMPANY FOR)
APPROVAL OF MODIFICATIONS)
TO AND AN EXTENSION OF ITS)
ELECTRIC RENEWABLE FEED-IN)
TARIFF PROVIDING FOR THE)
PURCHASE OF ENERGY FROM)
RENEWABLE ENERGY RESOURCES)
PURSUANT TO IND. CODE CH. 8-1-)
8.8 AND FOR THE CONTINUED) CAUSE NO. 44393
RECOVERY OF COSTS)
ASSOCIATED WITH THOSE)
PURCHASES UNDER IND. CODE § 8-)
1-2-42(a) OR SUCCESSOR)
MECHANISMS IN ACCORDANCE)
AND CONSISTENT WITH THE)
INDIANA UTILITY REGULATORY)
COMMISSION'S ORDER DATED)
JULY 13, 2011 IN CAUSE NO. 43922)

PETITION TO INTERVENE OF
INDIANA DISTRIBUTED ENERGY ALLIANCE INC.

The Indiana Distributed Energy Alliance, Inc. (“IndianaDG”), by counsel, individually and on behalf of its membership, respectfully requests the Commission permit it to intervene and become a party to this Cause. In support of this Petition, IndianaDG states:

1. IndianaDG is a membership organization operating as a not-for-profit corporation under the laws of the State of Indiana, and its mailing address is 545 E. Eleventh Street, Indianapolis, Indiana 46202.

2. IndianaDG was established for the purpose of promoting renewable energy resources and distributed generation in Indiana. IndianaDG works to achieve this mission by

promoting renewable energy and distributed generation policies and programs that give consideration to customer-owned electric-generating facilities, which present lower carbon risk and provide for greater flexibility and faster deployment of additional electric generation increments.

3. In this proceeding, NIPSCO is seeking, among other things, Commission approval to renew and modify its electric Experimental Rate 665 – Renewable Feed-In Tariff for purchase of energy and capacity from renewable energy sources. Because the mission of IndianaDG is the advancement and growth of the renewable energy industry in Indiana, IndianaDG and its members have a significant interest in the outcome of this proceeding.

4. In addition, IndianaDG's members include individuals, farmers, non-profits and businesses who are either (a) customers of NIPSCO, (b) businesses doing business with NIPSCO customers and/or (c) individuals and groups interested in the development of renewable energy and distributed generation resources to better the environment, increase sustainability, create green jobs and improve the security of the State of Indiana and the United States. Therefore, IndianaDG's membership has a direct and substantial interest in the outcome of this proceeding.

5. IndianaDG is the successor organization to Indiana Distributed Energy Advocates, Inc., which has appeared on behalf of its members before the Commission in prior proceedings, including Cause No. 43922 in which NIPSCO's Feed-In Tariff was initially approved. No other party can adequately represent the substantial interests of the members of IndianaDG.

6. The addition of IndianaDG as a party to this Cause will not unduly broaden the issues or otherwise burden the proceedings. IndianaDG understands that it is bound by the record as it stands at the time its Petition to Intervene is granted.

7. The name, address and telephone number of counsel for the Customer Group is as follows:

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8. Service of papers on counsel for IndianaDG in this Cause should be directed to the addresses above.

9. In addition, to the extent not prohibited by this Commission's rules, IndianaDG's President, Laura Ann Arnold, has requested that a courtesy copy of any electronically filed document also be copied to the following email address: Laura.Arnold@IndianaDG.net.

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

Respectfully submitted,

/s/ J. David Agnew
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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 15th day of September, 2013, on the following:

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/s/ J. David Agnew

J. David Agnew