

STATE OF INDIANA
 BEFORE THE
 INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS POWER)
 LIGHT COMPANY (“IPL”), AN INDIANA)
 CORPORATION, FOR (1) ISSUANCE OF)
 CERTIFICATES OF PUBLIC CONVENIENCE AND)
 NECESSITY AND APPROVAL OF PROJECTS TO)
 COMPLY WITH FEDERALLY MANDATED)
 REQUIREMENTS, INCLUDING THE CONSTRUCTION)
 OF WATER TREATMENT TECHNOLOGIES,) CAUSE NO. 44540
 OPERATIONAL CHANGES AND USE OF MODIFIED)
 STORMWATER MANAGEMENT PRACTICES AT)
 PETERSBURG AND HARDING STREET GENERATING)
 STATIONS, AND REFUELING OF HARDING STREET)
 STATION UNIT 7 (“COMPLIANCE PROJECT”); (2))
 FOR ONGOING REVIEW; AND (3) APPROVAL OF)
 ASSOCIATED RATEMAKING AND ACCOUNTING)
 TREATMENT, INCLUDING COST RECOVERY IN)
 ACCORDANCE WITH IND. CODE 8-1-8.4-7 AND)
 AUTHORITY TO DEFER COSTS UNTIL SUCH COSTS)
 ARE REFLECTED IN RATES)

Pursuant to 170 IAC 1-1.1-11, Petitioner, Indiana Rail Road Company (“INRD”) respectfully petitions to intervene in the above-captioned proceeding. In support hereof, INRD submits the following:

1. INRD is a regional railroad company formed in 1986 to serve central and southwest Indiana and central Illinois. INRD operates approximately 500 miles of railroad track with approximately 200 full time employees. INRD's primary operational facility is its Hiawatha Yard facility located at 1250 South Meridian in Jasonville Indiana. INRD’s largest rail customer is Indianapolis Power & Light Company (“IPL”). INRD provides coal transportation service primarily for IPL’s Harding Street Generating Station.

2. INRD has a substantial interest in the outcome of this proceeding. As part of its Petition, IPL is requesting authorization to convert its Harding Street Generation Station from coal to natural gas. This conversion would have a substantial, adverse financial impact on INRD. No other party to this proceeding adequately represents the interests of INRD in this proceeding

3. In conformance with 170 IAC 1-1.1-11, INRD is filing this Petition to Intervene more than five days prior to the date for the initial evidentiary hearing which is scheduled for April 12, 2015.

4. INRD's intervention will not unduly broaden the issues in this proceeding, nor will it result in an unreasonable delay. INRD accepts the procedural schedule as it currently stands and represents to the Commission that it will not seek an extension or delay in the scheduled evidentiary hearing. Additionally, INRD takes the case as it finds on the date of this intervention.

5. The attorneys representing INRD in this proceeding are:

Kristin Bevil, General Counsel
Indiana Rail Road Company
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Suite 1600
Indianapolis, Indiana 46240

Peter L. Hatton
Jane Dall Wilson*
Faegre Baker Daniels
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Ms. Wilson is the attorney authorized to receive service of all pleadings and communications in this proceeding.

Wherefore, INRD respectfully moves the Commission to grant its Petition to Intervene in this proceeding.

Respectfully Submitted,


FAEGRE BAKER DANIELS LLP

By: 
Peter L. Hatton

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing document have been served upon the following via electronic mail, this 31st day of March, 2015:

<p>IPL Teresa Morton Nyhart Jeffrey M. Peabody BARNES & THORNBURG, LLP 11 S. Meridian St. Indianapolis, IN 46204 tnyhart@btlaw.com jpeabody@btlaw.com</p>	<p>CAC and Sierra Club Jennifer A. Washburn CITIZENS ACTION COALITION 603 East Washington Street, Suite 502 Indianapolis, Indiana 46204 jwashburn@citact.org</p>
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