

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE JOINT PETITION OF)
WESTERN INDIANA ENERGY RURAL ELECTRIC)
MEMBERSHIP CORPORATION AND SOUTHERN)
INDIANA GAS & ELECTRIC COMPANY D/B/A)
CENTERPOINT ENERGY INDIANA SOUTH)
PURSUANT TO IND. CODE §8-1-2.3-6 FOR)
APPROVAL OF A CHANGE TO THE SERVICE AREA)
BOUNDARIES WITHIN U.S.G.S. FACET MAP D-29)
IN GIBSON COUNTY, INDIANA)

CAUSE NO. _____

**VERIFIED JOINT PETITION
TO MODIFY SERVICE AREA BOUNDARIES**

Western Indiana Energy Rural Electric Membership Corporation (“WIN Energy”) and Southern Indiana Gas & Electric Company d/b/a CenterPoint Energy Indiana South (“CEI South”) (together “Joint Petitioners”), jointly petition the Indiana Utility Regulatory Commission (“IURC” or “Commission”) to approve their Agreement to modify portions of their assigned service area boundaries located on U.S.G.S. Facet Map D-29 in Gibson County, Indiana, and state in support thereof:

1. Joint Petitioner, WIN Energy, is a Rural Electric Membership Corporation organized and existing under the laws of the State of Indiana, with its principal place of business located in Vincennes, Indiana. It is engaged in the business of distributing, furnishing and selling retail electric service to the public in parts of Clay, Gibson, Greene, Knox, Pike, Posey, Sullivan and Vigo counties and has the charter authority to do so.

2. Joint Petitioner, CEI South, is a Corporation organized and existing under the laws of the State of Indiana, with its principal place of business located in Evansville, Indiana. It is engaged in the business of distributing, furnishing and selling retail electric service to the public within its service territory, including parts of Gibson County and has the charter authority to do so.

3. Each Joint Petitioner is an “electricity supplier” as such term is defined by Ind. Code §8-1-2.3-2(b) and the provisions of Ind. Code §8-1-2.3-1 *et seq.* are deemed applicable to the subject matter of this Joint Petition. The Commission has jurisdiction over the Joint Petitioners and the subject matter of this proceeding.

4. Pursuant to the Commission’s December 21, 1983 Final Order (“Final Order”) in Cause No. 36299-S237(X), the Commission established boundary lines between the Joint Petitioners on U.S.G.S. Facet Map D-29.

5. Since that time, the Joint Petitioners have agreed that a certain service territory modification between WIN Energy and CEI South has become necessary. The Joint Petitioners’ proposed modification is shown on U.S.G.S. Facet Map D-29, attached as Exhibit “A” hereto (the “Proposed Area”). There is one area on Exhibit “A” which Joint Petitioners have agreed will become part of WIN Energy’s service territory. This area is already interconnected to WIN Energy’s system by distribution lines that are owned by WIN Energy.

6. The proposed modification as requested herein will not cause duplication of facilities, cause a waste of materials or resources, or cause uneconomic, inefficient or inadequate electric service to the public, consistent with Ind. Code §8-1-2.3-6(a)(2).

7. The Commission has jurisdiction of this action pursuant to Ind. Code §8-1-2.3-6(a)(2).

8. The name and address of WIN Energy’s attorney in this matter duly authorized to accept service of all pleadings, Orders, and other documents is:

Christopher M. Goffinet (Attorney No. 16409-62)
Huber, Goffinet & Hagedorn
644 – 12th Street
Tell City, Indiana 47586
Email: cgoffinetlaw@psci.net
Phone: (812) 547-7081
Facsimile: (812) 547-7083

9. The name and address of CEI South's attorney in this matter duly authorized to accept service of all pleadings, Orders and other documents is:

Heather A. Watts (Attorney No. 35482-82)
Southern Indiana Gas & Electric Company d/b/a CenterPoint Energy Indiana South
211 NW Riverside Drive
Evansville, Indiana 47708
Direct Dial: (812) 491-5119
Facsimile: (812) 491-4238
Email: heather.watts@centerpointenergy.com

10. In accordance with amended Ind. Code §8-1-2.3-6(2), Joint Petitioners will publish notice of these changes in a newspaper of general circulation in Gibson County, Indiana. Joint Petitioners will file with the Commission the proof of publication of Notice as well as a proposed order promptly following publication. See Exhibit "B" for a copy of the Notice. Further, joint petitioners will post the notice on their respective websites in accordance with 170 IAC 1-1.1-9.

11. The technical representative for WIN Energy is Chris Claybrooks, who can be reached at chrisc@winenergyremc.com and by phone at (800)-882-5140 and the technical representative for CEI South is Stephen Rawlinson, who can be reached at steve.rawlinson@centerpointenergy.com and by phone at (812) 491-4507.

12. The Parties agree to work with the Commission staff to update the Commission GIS maps, in accordance with any approval of boundary changes.

13. This change in service boundaries will result in CEI South losing limited service territory and WIN Energy gaining this service territory. The requested boundary change in the Proposed Area is necessary because a new customer requires service, and Joint Petitioners agree that it would be more cost effective for Win Energy to serve that customer.

14. Also pursuant to 170 IAC 1-1.1-9, Joint Petitioners hereby provide notice to this Commission that the parties reasonably anticipated to participate in this proceeding, WIN Energy REMC, CEI South, and the Office of Utility Consumer Counselor ("OUCC"), are in agreement with the following proposed procedural schedule:

- October 28, 2021: Joint Petitioners will file their petition with the Commission.
- November 4, 2021: (A week following the filing of the petition) the latest date by which the Joint Petitioners will publish legal notice of the service territory boundary changes in a newspaper of general circulation in Gibson County, Indiana. See exhibit "B" for a copy of the legal notice.
- November 24, 2021: twenty (20) days after publication of the legal notice: Joint Petitioners will file their Submittal of Proposed Form of Order and Proof of Publication. If after publication of the legal notice and twenty (20) days have passed and no affected electricity customer has requested a hearing, Joint Petitioners advise they waive any evidentiary hearing concerning this petition.
- November 29, 2021: three (3) business days following the immediately preceding deadline is the last date on which the OUCC may file its testimony and exhibits (if any) opposing &/or objecting to the relief requested by Joint Petitioners and (if applicable) requesting an evidentiary hearing in this cause of action.
- December 22, 2021: The end target date by which the parties request the issuance of the Commission's final Order concerning this petition.

WHEREFORE, Joint Petitioners, Western Indiana Energy Rural Electric Membership Corporation and Southern Indiana Gas & Electric Company d/b/a CenterPoint Energy Indiana South respectfully request that the Commission, pursuant to Ind. Code §8-1-2.3-6(a)(2), after twenty (20) days and if no affected electricity customer requests a hearing, enter an Order in this proceeding, without a hearing, permanently approving the changes to the service area boundaries on U.S.G.S. Facet Map D-29, as proposed in this Joint Petition.

Respectfully Submitted,

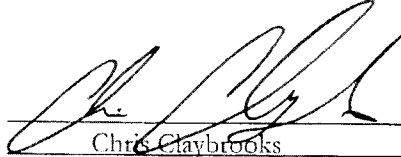
HUBER, GOFFINET & HAGEDORN

By: 

Christopher M. Goffinet
Huber, Goffinet & Hagedorn
644 – 12th Street
Tell City, Indiana 47586
Email: cgoffinetlaw@psci.net
Phone: (812) 547-7081
Facsimile: (812) 547-7083

VERIFICATION

I, Chris Claybrooks, affirm under penalties of perjury, that the foregoing representations contained in this Verified Joint Petition to Modify Service Area Boundaries that pertain to WIN Energy are true and correct to the best of my knowledge, information, and belief.



Chris Claybrooks Name
Operations Manager Title
Western Indiana Energy REMC

VERIFICATION

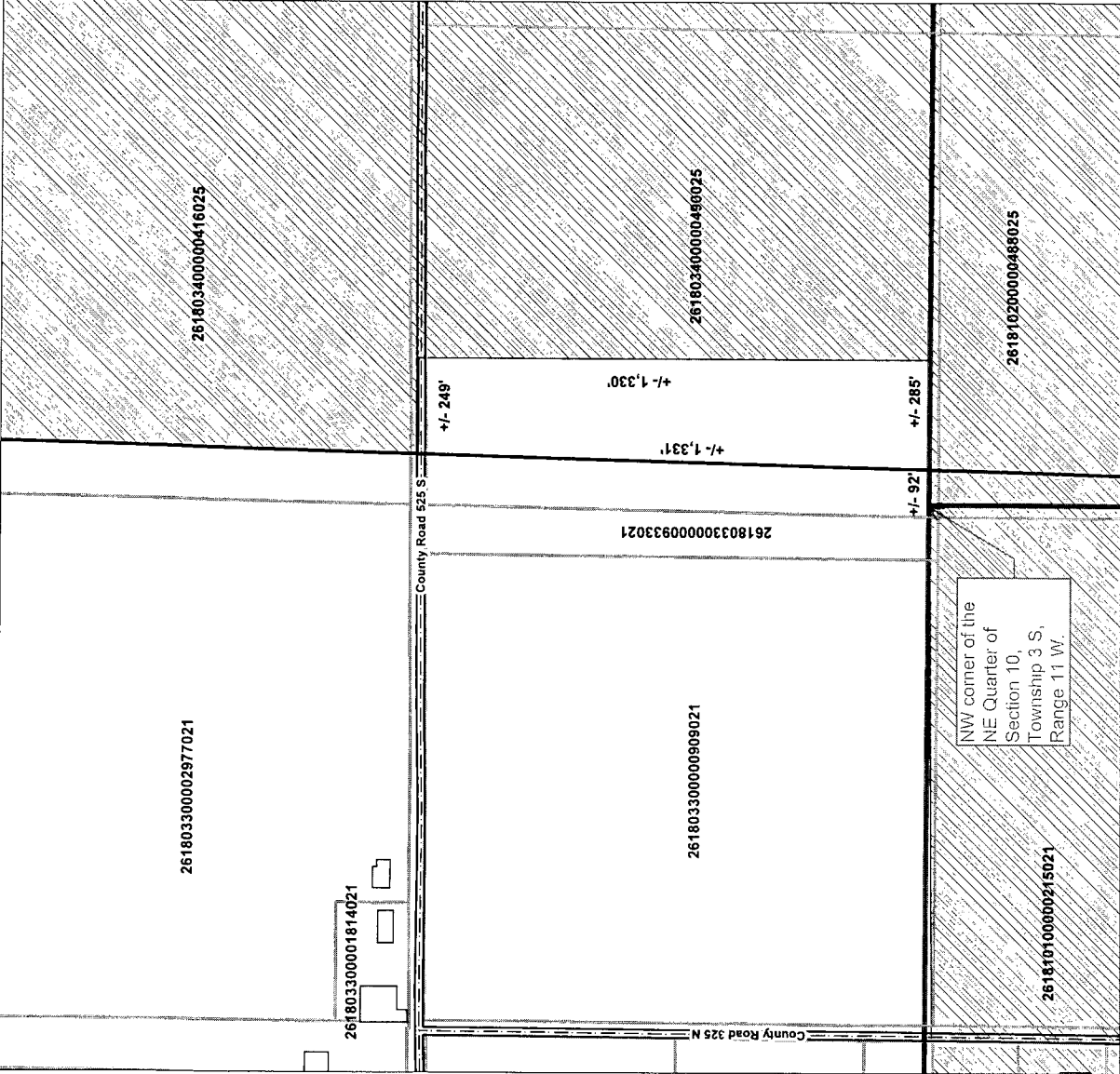
I, STEPHEN RAWLISON, affirm under penalties of perjury, that the foregoing representations contained in this Verified Joint Petition to Modify Service Area Boundaries that pertain to Southern Indiana Gas & Electric Company d/b/a CenterPoint Energy Indiana South are true and correct to the best of my knowledge, information, and belief.

Stephen Rawlison
STEPHEN RAWLISON Name
DIRECTOR, ELECTRIC ENGINEERING Title
Southern Indiana Gas & Electric Company
d/b/a CenterPoint Energy Indiana South

EXHIBIT "A"

FACET MAP

The area being relinquished is part of Parcel 26180340000490025. 375' East of the Northwest corner of the Northeast Quarter of Section 10, Township 3 South, Range 11 West and 1330 ft North of the Northwest corner of the Northeast Quarter of Section 10, Township 3 South, Range 11 West in Union Township in Gibson County.



Legend

- Parcel
- Relinquishment
- Sections
- Political Township
- SIGECO Electric
- Win Energy

PROJECT NAME: _____

CREATED BY: Jason Schaum

ISSUE DATE: 8/4/2021

SHEET # 1 OF 1

REQUESTED BY: Mathew Hartig

DISCLAIMER

Vectren provides this map for reference only. Call 811 before excavating. DO NOT RELY on this map for any use including legal, engineering, survey, or financial/cost estimating. Always contact Vectren 800-227-1376 prior to performing work on or around Vectren facilities.

EXHIBIT "B"
Form of Legal Notice
WIN Energy and CEI South
Service Territory
Change Petition

LEGAL NOTICE

**WESTERN INDIANA ENERGY RURAL ELECTRIC MEMBERSHIP CORPORATION
AND SOUTHERN INDIANA GAS & ELECTRIC COMPANY
D/B/A CENTERPOINT ENERGY INDIANA SOUTH
NOTICE OF INTENT TO FILE CHANGE IN BOUNDARY LINES**

WESTERN INDIANA ENERGY RURAL ELECTRIC MEMBERSHIP CORPORATION ("WIN ENERGY") and SOUTHERN INDIANA GAS & ELECTRIC COMPANY D/B/A CENTERPOINT ENERGY INDIANA SOUTH ("CEI SOUTH") hereby give notice that on October 28, 2021, a Joint Petition was filed with the Indiana Utility Regulatory Commission for approval to modify service area boundaries between WIN ENERGY & CEI SOUTH with an area near the intersection of County Road 325 North and County Road 525 South in Gibson County, Indiana located on U.S.G.S. Facet Map D-29 pursuant to Ind. Code §8-1-2.3-6(a)(2). Pursuant to Ind. Code § 8-1-2.3-6(a)(2), if notice of a verified request for a change of boundary lines by mutual agreement under this subdivision is published in a newspaper of general circulation in every county in which the boundary lines are located and an affected electricity customer does not request a hearing within twenty (20) days of the last date of publication, the commission may approve the change without a hearing.

WESTERN INDIANA ENERGY REMC

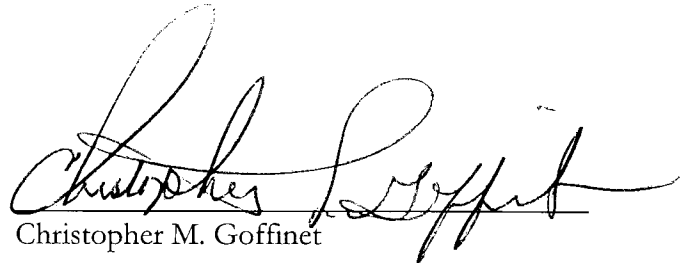
By: Chris Claybrooks
Operations Manager

CERTIFICATE OF SERVICE

The undersigned hereby certified that on 28th day of October, 2021, a copy of the following Verified Joint Petition to Modify Service Area Boundaries was served by hand delivery and/or electronic mail upon the following:

Indiana Office of Utility Consumer Counselor
ATTN: Randy Helmen
PNC Center
115 W. Washington Street
Suite 1500 South
Indianapolis, IN 46204
rhelmen@oucc.in.gov
infomgt@oucc.in.gov

Heather A. Watts
CEI South
211 NW Riverside Drive
Evansville, Indiana 47708



Christopher M. Goffinet

Christopher M. Goffinet
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