

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE JOINT PETITION OF)
DUKE ENERGY INDIANA, LLC AND TIPMONT)
RURAL ELECTRIC MEMBERSHIP CORPORATION)
PURSUANT TO IND. CODE § 8-1-2.3-6 FOR) CAUSE NO. _____
APPROVAL OF A CHANGE TO THE SERVICE)
AREA BOUNDARIES WITHIN U.S.G.S. FACET)
MAP I-11 IN TIPPECANOE COUNTY, INDIANA)

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

Tipmont Rural Electric Membership Corporation (“Tipmont REMC”) and Duke Energy Indiana, LLC (“Duke Energy Indiana”) jointly petition the Indiana Utility Regulatory Commission (“IURC” or “Commission”) to approve their Agreement to modify service area boundaries located on U.S.G.S. Facet Map I-11 in Tippecanoe County, Indiana, and state in support thereof:

1. Joint Petitioner, Tipmont REMC, 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 Linden, Indiana. It is engaged in the business of distributing, furnishing, and selling retail electric service to the public in several counties in the State of Indiana, including Tippecanoe County, and has charter authority to do so.

2. Joint Petitioner, Duke Energy Indiana, is a public utility organized and existing under the laws of the State of Indiana and has its principal office at 1000 East Main Street, Plainfield, Indiana. It is a wholly owned subsidiary of Duke Energy Indiana Holdco, LLC and an affiliate of Duke Energy Business Services LLC and Duke Energy Corporation. It is engaged in the business of distributing, furnishing, and selling retail electric service to the public in numerous counties in the State of Indiana, including Tippecanoe County, and has 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.

4. Pursuant to the Commission’s November 23, 1983 Final Order (“Final Order”) in Cause No. 36299-S203(X), the Commission established boundary lines between the Joint Petitioners on U.S.G.S. Facet Map I-11 utilizing the modified mid-point between then existing electric distribution lines of the Joint Petitioners.

5. Portions of the boundary lines approved in said Final Order traversed through real estate in U.S.G.S. Facet Map I-11. Since that time, the Joint Petitioners have agreed that a specific service territory modification between Tipmont REMC and Duke Energy Indiana has become necessary. The Joint Petitioners’ proposed modification is shown on U.S.G.S. Facet Map I-11 and Exhibits A-1 through A-3 attached hereto.

6. Exhibit A-1, U.S.G.S. Facet Map I-11, identifies the proposed boundary change as a red-outlined area. Exhibit A-2 is a detailed sketch plan of the property at issue with the proposed boundary changes identified by the red cross-hatched area. Exhibit A-3 is an image of the property showing the traded area outlined by dotted red boundary lines. This change in service boundaries consists of Duke Energy Indiana losing service territory and Tipmont REMC gaining service territory.

7. The requested proposed modification will not cause duplication of facilities, a waste of materials or resources, or uneconomic, inefficient, or inadequate electric service to the public, all as required by Ind. Code § 8-1-2.3-6(2). The parties have determined that it is more cost effective for Tipmont REMC to serve the area than for Duke Energy Indiana to do so.

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

9. The names and addresses of Tipmont REMC's attorney in this matter duly authorized to accept service of all pleadings, Orders and other documents is:

Jane Dall Wilson
Faegre Drinker Biddle & Reath LLP
300 North Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: (317) 237-0300
Facsimile: (317) 237-1000
Email: jane.wilson@faegredrinker.com

10. The name and address of Duke Energy Indiana's attorney in this matter duly authorized to accept service of all pleadings, Orders and other documents is:

Andrew J. Wells
Duke Energy Business Services LLC
1000 East Main Street
Plainfield, IN 46168
Telephone: (317) 838-2461
Email: andrew.wells@duke-energy.com

11. In accordance with amended Ind. Code § 8-1-2.3-6, Joint Petitioners will publish notice of these changes, in a newspaper of general circulation in Tippecanoe County, Indiana. See Exhibit B for a copy of the Notice. Further in accordance with 170 IAC 1-1.1-9, Tipmont REMC will post the Legal Notice on its Company website located at <https://connect.tipmont.org/categories/electric/notice-of-electric-service-territory-change>, and Duke Energy Indiana will post the Legal Notice on its Company website located at <https://www.duke-energy.com/home/billing/rates>, where each Legal Notice will remain for at least thirty (30) days following a Final Order in this cause of action.

12. 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, Duke

Energy Indiana, Tipmont REMC and the Office of Utility Consumer Counselor (“OUCC”), are in agreement with the following Proposed Procedural Schedule:

- | | |
|---------------------------|--|
| February 4, 2025: | Joint Petitioners will file their Petition with the Commission. |
| February 11, 2025: | The latest date by which Joint Petitioners will publish legal notice of the service territory boundary changes in a newspaper of general circulation in Tippecanoe County, Indiana. See Exhibit B for a copy of the Legal Notice. |
| March 11, 2025: | The latest date by which the OUCC may prefile Testimony and Exhibits, if any, or request an evidentiary hearing in this cause of action. |
| April 10, 2025: | 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 an evidentiary hearing concerning this Petition. |
| April 30, 2025: | The end target date by which the parties request the issuance of the Commission’s Final Order concerning this Petition. |

13. The technical representative for Tipmont REMC is Joseph Kline, who can be reached at 765-426-6170 or via email at jkline@tipmont.org and the technical representative for Duke Energy Indiana is Trent Godsey, Lead Engineer, who can be reached at 317-982-2659 or via email at Trent.Godsey@duke-energy.com.

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

15. The requested boundary changes will not cause the service supplier to change for any existing customer.

WHEREFORE, Joint Petitioners, Duke Energy Indiana and Tipmont REMC, respectfully request that the Commission, pursuant to Ind. Code § 8-1-2.3-6(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 I-11, as identified on Exhibits A-1 through A-3, as proposed in this Joint Petition.

Respectfully submitted,

FAEGRE DRINKER BIDDLE & REATH LLP

s/Jane Dall Wilson

Jane Dall Wilson (Atty. No. 24142-71)

300 North Meridian Street, Suite 2500

Indianapolis, IN 46204

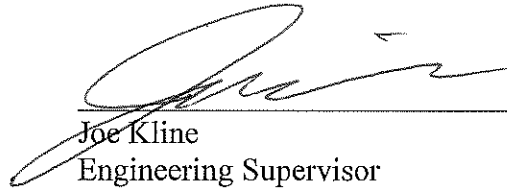
(317) 237-0300

(317) 237-1000 (facsimile)

jane.wilson@faegredrinker.com

VERIFICATION

I, Joe Kline, Engineering Supervisor, affirm under penalties of perjury, that the foregoing representations contained in this Verified Joint Petition to Modify Service Area Boundaries that pertain to Tipmont Rural Electric Membership Corporation are true and correct to the best of my knowledge, information, and belief.



Joe Kline
Engineering Supervisor

VERIFICATION

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

Dated: 2/3/2025



Richard McClain
Director, CD Area Operations
Duke Energy Indiana, LLC

CERTIFICATE OF SERVICE

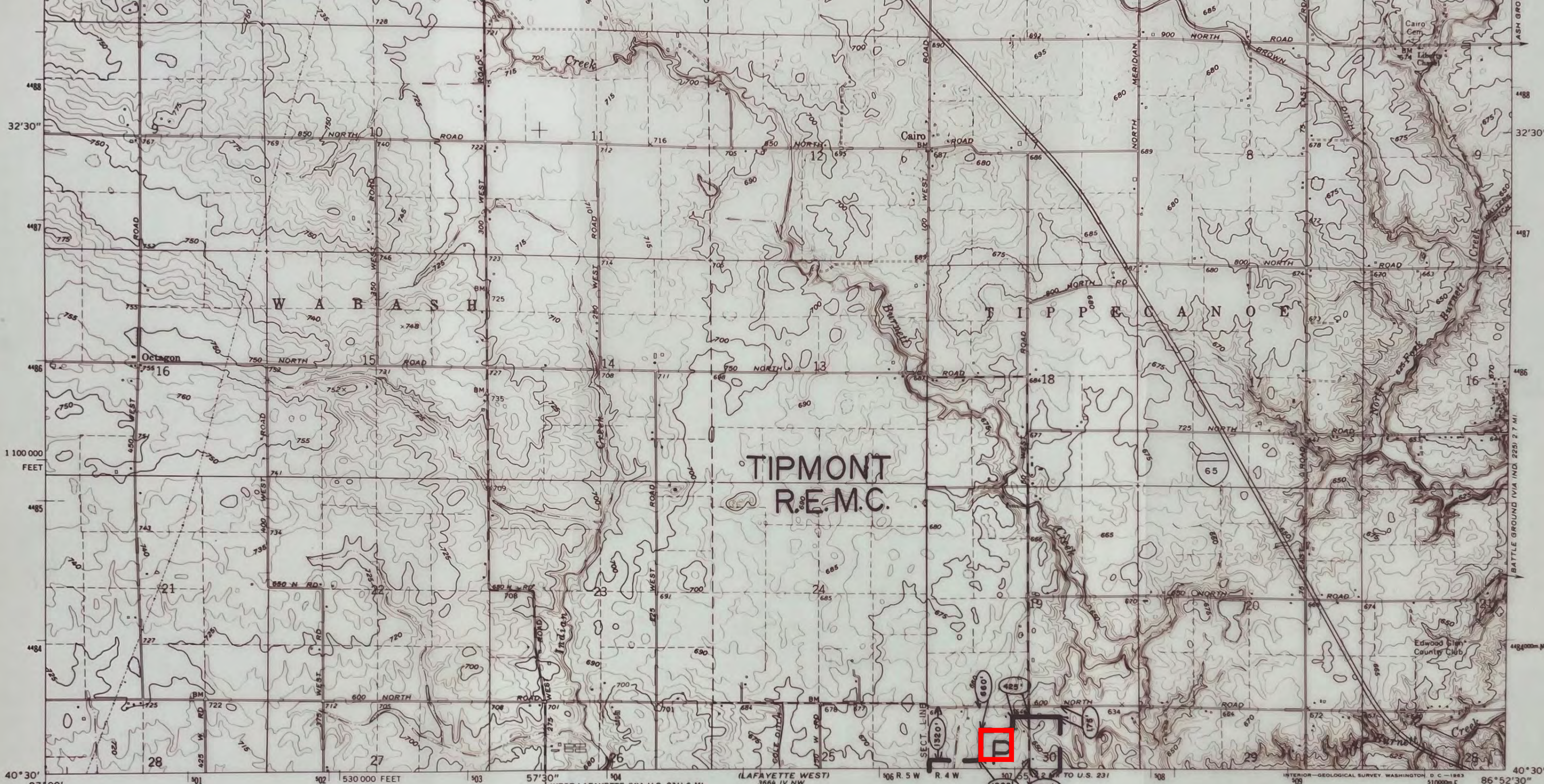
The undersigned hereby certifies that a copy of the foregoing Verified Petition was electronically delivered this 4th day of February 2025, to:

Victor Peters
Indiana Office of Utility Consumer Counselor
PNC Center
115 W. Washington St., Suite 1500 South
Indianapolis, IN 46204
vipeters@oucc.in.gov
infomgt@oucc.in.gov

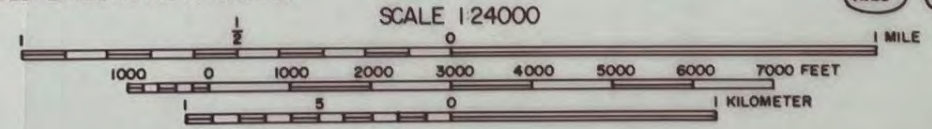
Andrew J. Wells
Duke Energy Business Services LLC
1000 East Main Street
Plainfield, IN 46168
Telephone: (317) 838-2461
Email: Andrew.Wells@duke-energy.com

s/Jane Dall Wilson
Jane Dall Wilson

EXHIBIT A-1



COMPILED FROM U.S. GEOLOGICAL SURVEY MAP
ELECTRIC UTILITY SERVICE AREAS
STATE OF INDIANA



APPROVED P.S.C.I. ORDER 36299-S 203(X) DATE 11-23-83

UTILITY	ELECTRIC UTILITIES SERVING THIS AREA		
P PUBLIC SERVICE INDIANA	BY <i>Shane Hoffman</i>	TITLE <i>SR. V.P.</i>	DATE <i>12/9/83</i>
55 TIPMONT R.E.M.C.	BY <i>Robert W. Prater</i>	TITLE <i>STAFF ENG.</i>	DATE <i>12-16-83</i>
70 WHITE CO R.E.M.C.	BY <i>Darrell E. Gilbert</i>	TITLE <i>ENGR.</i>	DATE <i>12-16-83</i>
	BY _____	TITLE _____	DATE _____
	BY _____	TITLE _____	DATE _____
	BY _____	TITLE _____	DATE _____

EXHIBIT A-2



EXHIBIT A-3



**Trade from Duke Energy
to Tipmont REMC**



0 200 400 Feet

**LEGAL NOTICE
TIPMONT RURAL ELECTRIC
MEMBERSHIP CORPORATION
AND DUKE ENERGY INDIANA, LLC
NOTICE OF INTENT TO FILE CHANGE
IN BOUNDARY LINES**

Tipmont Rural Electric Membership Corporation (“Tipmont REMC”) and Duke Energy Indiana, LLC (“Duke Energy Indiana”) hereby give notice that on February 4, 2025, a Joint Petition was filed with the Indiana Utility Regulatory Commission for approval to modify service area boundaries between Tipmont REMC and Duke Energy Indiana associated with an area located in Tippecanoe Township, Twp 24N, Rng 4W, Sec 30, SW of the intersection of CR 600 N and CR 50 W, located on U.S.G.S. Facet Map I-11 in Tippecanoe County, Indiana pursuant to Ind. Code § 8-1-2.3-6.

Tipmont REMC
By: Ron Holcomb, President