

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC SERVICE)
COMPANY (“PETITIONER”) FOR APPROVAL OF AND)
AUTHORITY FOR: (1) MODIFICATION TO ITS RATES)
AND CHARGES FOR GAS UTILITY SERVICES; (2) NEW)
SCHEDULES OF RATES AND CHARGES APPLICABLE)
THERETO; (3) REVISIONS TO ITS DEPRECIATION)
ACCRUAL RATES; (4) DEFERRAL OF ACCRUED)
DEPRECIATION EXPENSE; (5) DEFERRAL IN A)
BALANCING ACCOUNT OF OVER AND UNDER)
RECOVERIES OF PENSION AND OPEB EXPENSES; (6))
CONTINUATION OF NIPSCO’S ENERGY EFFICIENCY)
PROGRAM WITH MODIFICATIONS; (7))
IMPLEMENTATION OF A NEW LOW-INCOME)
PROGRAM; (8) CERTAIN RATEMAKING TREATMENTS)
FOR REVENUES AND EXPENSES RELATING TO)
SERVICES AND PROGRAMS OFFERED PURSUANT TO)
PETITIONER’S CUSTOMER CHOICE ALTERNATIVE)
REGULATORY PLAN; (9) TO THE EXTENT NECESSARY,)
GRANTING THE REQUESTED RELIEF AS AN)
ALTERNATIVE REGULATORY PLAN PURSUANT TO I.C.)
8-1-2.5; (10) MODIFICATION OF PETITIONER’S GAS COST)
COMPONENT OF BAD DEBT EXPENSE; AND (11))
VARIOUS CHANGES TO ITS TARIFF FOR GAS SERVICE)
INCLUDING IMPLEMENTING A STRAIGHT-FIXED)
VARIABLE RATE DESIGN, REMOVAL OF GAS COSTS)
FROM BASE RATES AND CHANGES TO ITS GENERAL)
TERMS AND CONDITIONS FOR SERVICE)

FILED
August 20, 2010
INDIANA UTILITY
REGULATORY COMMISSION

CAUSE NO. 43894

JOINT MOTION FOR EXTENSION OF PRE-FILING DEADLINE

Comes now the Indiana Office of Utility Consumer Counselor (“OUCC”), the Northern Indiana Public Service Company (“NIPSCO”) Industrial Group (“IG”), Citizen’s Action Coalition (“CAC”) and the NIPSCO Marketer’s Group (“MG”) (collectively, the “Moving Parties”), by counsel, and hereby move for an extension of the Public and Intervenors’ pre-filing deadline in this cause until September 1, 2010 as set forth below. In support of this Motion the Moving Parties state the following:

1. NIPSCO, the OUCC, CAC, MG and IG have been, and continue to be, engaged in fruitful settlement discussions on a range of issues raised by NIPSCO's Petition in this Cause.

2. NIPSCO, the OUCC, CAC, MG and IG continue to make progress and anticipate being able to reach a global settlement, and require additional time in which to clarify and substantiate the terms and conditions upon which any settlement might be reached.

3. The procedural schedule currently provides that the Public and Intervenors should prefile their respective cases-in-chief on or before August 20, 2010, and provide to the Commission two sets of working papers and supporting materials on or before August 24, 2010.

4. The parties anticipate filing a Settlement Agreement on or before August 25, 2010. Given that the prehearing conference order requires the Settlement Agreement to be filed at least five (5) business days prior to the Settlement Hearing date, the parties request that the September 1, 2010 settlement hearing date not be vacated at this time, but rather be converted to an attorney's conference for purposes of establishing a revised procedural schedule.

5. Counsel for the CAC, IG and MG have been contacted, concur with the proposed extension, and have authorized the OUCC to file this Motion on behalf of the Moving Parties. NIPSCO does not object to this request.

WHEREFORE, the Moving Parties request an extension of time as requested herein.

Respectfully submitted,


Lorraine Hitz-Bradley, Atty. No. 18006-29
Deputy Consumer Counselor

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Joint Motion for Extension of Pre-filing Deadline* has been served upon the following counsel of record in the captioned proceeding by electronic service on August 20, 2010.

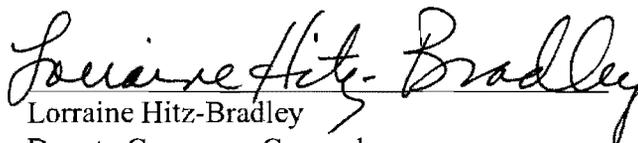
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