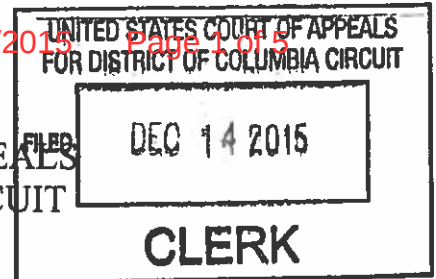


IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT



INDIANA UTILITY GROUP)

Petitioner,)

v.)

UNITED STATES ENVIRONMENTAL)
PROTECTION AGENCY, and REGINA A.)
MCCARTHY, Administrator, United States)
Environmental Protection Agency,)

Respondents.)

Case No. 15-1458

PETITION FOR REVIEW

The Indiana Utility Group hereby petitions this Court, pursuant to Rule 15(a) of the Federal Rules of Appellate Procedure, Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1), and 5 U.S.C. § 702, for review of the final rule of the United States Environmental Protection Agency published in the Federal Register at 80 Fed. Reg. 64,509 (October 23, 2015) and titled “Standards of Performance for Greenhouse Gas Emissions From New, Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units,” This Court has jurisdiction, and is a proper venue for this action, under 42 U.S.C. § 7601(b)(1).

Petitioner will show that the final rule is not supported by the agency’s statutory authority, goes beyond the U.S. Constitution, and is arbitrary, capricious, and an abuse of discretion and not in accordance with law. Accordingly, Petitioner

ORIGINAL

asks the Court to hold unlawful and set aside the rule, and to order other such relief as may be appropriate. See 42 U.S.C. § 7607(d).

Dated: December 11, 2015.

Respectfully submitted,

A handwritten signature in blue ink, reading "David M. Flannery", is written over a horizontal line.

David M. Flannery
Kathy G. Beckett
Edward L. Kropp
Steptoe & Johnson, PLLC
Chase Tower, Eighth Floor
Post Office Box 1588
Charleston, WV 25326
Tel. (304) 353-8000
Email: Dave.flannery@steptoe-johnson.com
Kathy.beckett@steptoe-johnson.com
Skipp.kropp@steptoe-johnson.com

Stephen L. Miller
Steptoe & Johnson, PLLC
700 N. Hurstbourne Parkway, Suite 115
Louisville, Kentucky 40222
Tel. (502) 423-2000
Email: steve.miller@steptoe-johnson.com

*Counsel for Petitioner
Indiana Utility Group*

CERTIFICATE OF SERVICE

I hereby certify that I will cause to be served a true copy of the Petition for Review via U.S. mail on the 11th day of December, 2015, upon the following:

Hon. Regina McCarthy
Office of the Administrator (1101A)
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

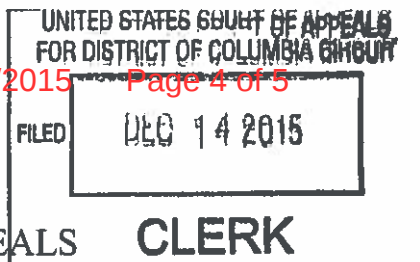
Hon. Loretta E. Lynch
Attorney General for the United States
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Correspondence Control Unit
Office of General Counsel (2311)
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Hon. John C. Cruden
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice
Robert F. Kennedy Building
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530



David M. Flannery
Counsel for Petitioners
Indiana Utility Group



DEC 14 2015

IN THE UNITED STATES COURT OF APPEALS
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INDIANA ENERGY ASSOCIATION and)
INDIANA UTILITY GROUP)

Petitioner,)

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UNITED STATES ENVIRONMENTAL)
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MCCARTHY, Administrator, United States)
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**RULE 26.1 DISCLOSURE STATEMENT OF PETITIONER
INDIANA UTILITY GROUP**

Pursuant to FRAP 26.1 and Local Rule 26.1, the INDIANA UTILITY
GROUP ("IUG"), a petitioner files the following statement:

INDIANA UTILITY GROUP is a continuing association of individual
electric generating companies operated for the purpose of promoting the general
interests of the membership of electric generators. IUG has no outstanding shares
or debt securities in the hand of the public and has no parent company. No
publicly held company has a 10% or greater ownership interest in IUG.

Respectfully submitted,



David M. Flannery

Counsel for Indiana Utility Group

STEPTOE & JOHNSON PLLC

707 Virginia Street, East

Post Office Box 1588

Charleston, West Virginia 25326

(304) 353-8000

Dave.flannery@steptoe-johnson.com

Counsel for the Indiana Utility Group

Dated: December 11, 2015