

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF THE CITY OF EAST CHICAGO,)
INDIANA FOR AUTHORITY TO ISSUE BONDS,)
NOTES, OR OTHER OBLIGATIONS FOR)
AUTHORITY TO INCREASE ITS RATES AND) CAUSE NO. 44826
CHARGES FOR WATER SERVICE, AND FOR)
APPROVAL OF NEW SCHEDULES OF WATER)
RATES AND CHARGES.)

INDUSTRIAL GROUP'S PETITION TO INTERVENE

Come now certain intervenors designated collectively as the City of East Chicago Industrial Group ("Industrial Group"), by counsel, and file their Petition to Intervene in the above-captioned proceeding and, in support thereof, state the following:

1. Petitioner ("City of East Chicago") filed its Petition in the above-captioned matter on August 4, 2016 instituting a rate case.

2. Attachment A to this Petition is a list of the companies that comprise the Industrial Group. It is possible that additional customers will join the Industrial Group and Attachment A will be amended to reflect additions as they occur.

3. As industrial customers of the City of East Chicago, members of the Industrial Group are reliant upon the City of East Chicago for consistent, reliable and reasonably priced utility service to support their respective operations. As a consequence, they have a direct, immediate and substantial interest in the subject matter of this proceeding.

4. Because of the importance of water in their industrial operations, members of the Industrial Group are substantially affected by the cost of water service provided by the City of East Chicago. The intervention by members of the Industrial Group in this

proceeding is for the purpose of responding to those issues raised by the City of East Chicago's petition or required by law to be determined by the Commission in this proceeding and all issues related thereto.

5. The Industrial Group is not adequately represented by any other party to this proceeding.

6. The intervention of the Industrial Group will not unduly broaden the issues being addressed in this proceeding nor result in an unreasonable delay.

7. The attorneys representing the members of the Industrial Group in this proceeding are:

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WHEREFORE, the members of the Industrial Group request the Commission for leave to intervene and to be made a party of record in the above-captioned matter and for all other just and proper relief.

Respectfully submitted,

/s/ Bette J. Dodd
Bette J. Dodd, #4765-49

ATTACHMENT "A"

Arcelor Mittal USA
3300 Dickey Road MC 4-442
East Chicago, IN 46312

Praxair, Inc.
4400 Kennedy Avenue
East Chicago, IN 46312

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing document was served via electronic mail this 10th day of November, 2016:

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/s/ Bette J. Dodd

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