

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF NORTHERN INDIANA )  
PUBLIC SERVICE COMPANY LLC FOR (1) )  
APPROVAL OF AN ADJUSTMENT TO ITS )  
ELECTRIC SERVICE RATES THROUGH ITS )  
TRANSMISSION, DISTRIBUTION, AND )  
STORAGE SYSTEM IMPROVEMENT CHARGE )  
("TDSIC") RATE SCHEDULE; (2) AUTHORITY )  
TO DEFER 20% OF THE APPROVED CAPITAL ) CAUSE NO. 44733-TDSIC-7  
EXPENDITURES AND TDSIC COSTS FOR )  
RECOVERY IN PETITIONER'S NEXT GENERAL )  
RATE CASE (3) APPROVAL OF PETITIONER'S )  
UPDATED 7-YEAR ELECTRIC PLAN, )  
INCLUDING ACTUAL AND PROPOSED )  
ESTIMATED CAPITAL EXPENDITURES AND )  
TDSIC COSTS THAT EXCEED THE APPROVED )  
AMOUNTS IN CAUSE NO. 44733-TDSIC-6, AND )  
(4) AUTHORITY TO MODIFY THE )  
RATEMAKING TREATMENT AUTHORIZED IN )  
CAUSE NO. 44371, ALL PURSUANT TO IND. )  
CODE § 8-1-39-9. )

**PETITION TO INTERVENE**

Come now certain intervenors designated collectively as the NIPSCO Industrial Group ("Industrial Group"), by counsel, and file their Petition to Intervene in the above-captioned proceeding pursuant to IAC 1-1.1-11 and, in support thereof, state the following:

1. The Industrial Group is an ad hoc group of industrial users located in the electric service territory of Northern Indiana Public Service Company ("NIPSCO"), including the companies listed on Appendix "A", which is attached hereto and made a part hereof. Additional members may be joining the Industrial Group for the purpose of this proceeding, in which case the Commission will be notified.

2. As industrial customers of NIPSCO, purchasing electric service from it, the members of the Industrial Group have a direct, immediate and substantial interest in the subject matter of this proceeding.

3. Because of those interests, members of the Industrial Group seek to intervene to protect them, and the interest of members of the Industrial Group are not and will not be adequately represented by existing parties in this proceeding.

4. Members of the Industrial Group believe that NIPSCO should provide electric service in an efficient, dependable and economic manner, consistent with sound management, and that it has a duty and the responsibility to make every reasonable effort to do so.

5. Because of the importance of electricity in their industrial operations, the members of the Industrial Group are substantially affected by the cost of electric service provided by NIPSCO. The intervention by the Industrial Group in this proceeding is for the purpose of responding to those issues raised by NIPSCO's petition, or required by law to be determined by the Commission in this proceeding, and all issues related thereto.

6. The members of the Industrial Group, therefore, have a substantial interest in the subject matter of this proceeding, and their intervention will not unreasonably broaden the issues involved in this proceeding.

7. The addresses of the members of the Industrial Group requesting intervention in this proceeding are set forth on Appendix "A" attached hereto and made a part hereof.

8. The attorneys representing the Industrial Group in this proceeding are:

Todd A. Richardson, Atty No. 16620-49  
Aaron A. Schmoll, Atty No. 20359-49  
LEWIS & KAPPES, P.C.  
One American Square, Suite 2500  
Indianapolis, Indiana 46282-0003  
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The above-named attorneys are authorized to accept service of papers in this proceeding on behalf of the members of the Industrial Group.

9. This Petition to Intervene is being filed more than five (5) days prior to any date set for the initial evidentiary hearing in this proceeding.

WHEREFORE, the members of the Industrial Group, as set forth on Appendix "A" attached hereto and made a part hereof, respectfully request that they be granted leave to intervene and be made parties to the above-captioned proceeding.

Respectfully submitted,

LEWIS & KAPPES, P.C.

/s/ Aaron A. Schmoll

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Aaron A. Schmoll, Atty No. 20359-49

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## APPENDIX "A"

<b>ARCELORMITTAL USA</b> 3300 Dickey Road MC 4-442 East Chicago, Indiana 46312  <b>LINDE, INC.</b> 4400 Kennedy Avenue East Chicago, Indiana 46312  <b>NLMK INDIANA</b> 6500 South Boundary Road Portage, Indiana 46368	<b>USG CORPORATION</b> 301 Riley Rd. East Chicago, Indiana 46312  <b>UNITED STATES STEEL CORPORATION</b> Gary Works One North Broadway Gary, Indiana 46402
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that copies of the foregoing document have been served upon the following via electronic mail, this 4<sup>th</sup> day of December, 2020:

Bryan M. Likins  
NISOURCE CORPORATE SERVICES - LEGAL  
150 West Market Street, Suite 600  
Indianapolis, IN 46204  
[blikins@nisource.com](mailto:blikins@nisource.com)

*With a courtesy copy to:*

Alison M. Becker  
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COMPANY  
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*/s/ Aaron A. Schmoll*

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Aaron A. Schmoll

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