

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN POWER )  
COMPANY, AN INDIANA CORPORATION, FOR (1) )  
AUTHORITY TO INCREASE ITS RATES AND )  
CHARGES FOR ELECTRIC UTILITY SERVICE )  
THROUGH A PHASE IN RATE ADJUSTMENT; (2) )  
APPROVAL OF: REVISED DEPRECIATION RATES; )  
ACCOUNTING RELIEF; INCLUSION IN BASIC RATES )  
AND CHARGES OF QUALIFIED POLLUTION CONTROL )  
PROPERTY, CLEAN ENERGY PROJECTS AND COST OF )  
BRINGING I&M'S SYSTEM TO ITS PRESENT STATE OF )  
EFFICIENCY; RATE ADJUSTMENT MECHANISM )  
PROPOSALS; COST DEFERRALS; MAJOR STORM )  
DAMAGE RESTORATION RESERVE AND )  
DISTRIBUTION VEGETATION MANAGEMENT )  
PROGRAM RESERVE; AND AMORTIZATIONS; AND (3) )  
FOR APPROVAL OF NEW SCHEDULES OF RATES, )  
RULES AND REGULATIONS )

FILED

July 27, 2017

INDIANA UTILITY

REGULATORY COMMISSION

CAUSE NO. 44967

**PETITION TO INTERVENE**

The I&M Industrial Group ("Industrial Group"), by counsel, files this Petition to Intervene in the above-captioned proceeding pursuant to IAC 1-1.1-11 and, in support thereof, states the following:

1. The Industrial Group is an *ad hoc* group of industrial users located in the electric service territory of Indiana Michigan Power Company ("I&M"), 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 and the Commission and parties will be notified of any such additions.

2. As industrial customers of I&M that purchase electric power from I&M and rely on that power for the operation of their facilities, the members of the Industrial Group have a direct, immediate and substantial interest in the subject matter of this proceeding.

3. The members of the Industrial Group seek to intervene to protect their interests. 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 I&M should provide electric service in an efficient, dependable and economic manner, consistent with sound management, and it has a duty and the responsibility to make every reasonable effort to acquire fuel and generate, purchase power, or both, so as to provide electricity to retail customers at the lowest cost reasonably possible.

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

6. 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 members of the Industrial Group in this proceeding are:

Bette J. Dodd, #4765-49  
Joseph P. Rompala, #25078-49  
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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 I&M 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.

DATED: July 27, 2017

Respectfully submitted,

LEWIS KAPPES, P.C.

*/s/ Bette J. Dodd* \_\_\_\_\_

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**APPENDIX "A"**

**GENERAL MOTORS LLC**  
12200 Lafayette Center Road  
Roanoke, Indiana 46783

**I/N TEK L.P.**  
3300 Dickey Road MC 4-442  
East Chicago, IN 46312

**MARATHON PETROLEUM COMPANY LP**  
2100 East State Road 28  
Muncie, Indiana 47303

**PRAXAIR, INC.**  
4400 Kennedy Avenue  
East Chicago, Indiana 46312

**THE LINDE GROUP**  
7996 North State Road 39  
LaPorte, Indiana 46350

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served via electronic mail, this 27<sup>th</sup> day of July, 2017, upon the following:

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*/s/ Bette J. Dodd*

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