

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANA MICHIGAN )  
POWER COMPANY (I&M), AN INDIANA )  
CORPORATION, FOR APPROVAL OF A CLEAN )  
ENERGY PROJECT AND QUALIFIED )  
POLLUTION CONTROL PROPERTY AND FOR )  
ISSUANCE OF CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY FOR USE OF )  
CLEAN COAL TECHNOLOGY; FOR ONGOING )  
REVIEW; FOR APPROVAL OF ACCOUNTING )  
AND RATEMAKING, INCLUDING THE TIMELY )  
RECOVERY OF COSTS INCURRED DURING )  
CONSTRUCTION AND OPERATION OF SUCH )  
PROJECT THROUGH I&M'S CLEAN COAL )  
TECHNOLOGY RIDER; FOR APPROVAL OF )  
DEPRECIATION PROPOSAL FOR SUCH )  
PROJECT; AND FOR AUTHORITY TO DEFER )  
COSTS INCURRED DURING CONSTRUCTION )  
AND OPERATION, INCLUDING CARRYING )  
COSTS, DEPRECIATION, TAXES, OPERATION )  
AND MAINTENANCE AND ALLOCATED )  
COSTS, UNTIL SUCH COSTS ARE REFLECTED )  
IN THE CLEAN COAL TECHNOLOGY RIDER OR )  
OTHERWISE REFLECTED IN I&M'S BASIC )  
RATES AND CHARGES. )

CAUSE NO. 44871

**INDUSTRIAL GROUP'S PETITION TO INTERVENE**

The I&M Industrial Group ("Industrial Group"), by counsel, files its Petition to Intervene in the above-captioned proceeding pursuant to 170 IAC 1-1.1-11 and, in support thereof, states the following:

1. I&M 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 I&M Industrial Group for the purpose of this proceeding and the Commission will be notified.

2. As industrial customers of I&M, purchasing electricity from it, 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 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 fuel cost reasonably possible.

5. Because of the importance of energy in their individual 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:

Timothy L. Stewart, Atty No. 2189-49  
Jennifer W. Terry, Atty No. 21145-53A  
LEWIS KAPPES, P.C.  
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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.

DATED: October 25, 2016

Respectfully submitted,

LEWIS KAPPES, P.C.

/s/ Timothy L. Stewart

Timothy L. Stewart, Atty No. 2189-49  
Jennifer W. Terry, Atty No. 21145-53A

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**APPENDIX "A"**

**AIR PRODUCTS AND CHEMICALS, INC.**

7201 Hamilton Boulevard  
Allentown, Pennsylvania 18195

**ARCELORMITTAL USA LLC**

3300 Dickey Road MC 4-442  
East Chicago, Indiana 46312

**GENERAL MOTORS, LLC**

12200 Lafayette Center Road  
Roanoke, Indiana 46783

**LINDE, LLC**

575 Mountain Avenue  
Murray Hill, New Jersey 07974

**MARATHON PETROLEUM COMPANY LP**

2100 East State Road 28  
Muncie, Indiana 47303

**PRAXAIR, INC.**

4400 Kennedy Avenue  
East Chicago, Indiana 46312

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a copy of the foregoing document was served upon the following via electronic mail, hard copies available upon request, this 25<sup>th</sup> day of October, 2016:

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*A courtesy copy to:*  
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*/s/ Timothy L. Stewart*  
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