

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC SERVICE)
COMPANY LLC PURSUANT TO IND. CODE §§ 8-1-2-42.7,)
8-1-2-61 AND, IND. CODE § 8-1-2.5-6 FOR (1) AUTHORITY TO)
MODIFY ITS RATES AND CHARGES FOR ELECTRIC)
UTILITY SERVICE THROUGH A PHASE IN OF RATES; (2))
APPROVAL OF NEW SCHEDULES OF RATES AND)
CHARGES, GENERAL RULES AND REGULATIONS, AND) CAUSE NO. 45159
RIDERS; (3) APPROVAL OF REVISED COMMON AND)
ELECTRIC DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL OF)
NECESSARY AND APPROPRIATE ACCOUNTING RELIEF;)
AND (5) APPROVAL OF A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

PETITION TO INTERVENE OF LAPORTE COUNTY

The Board of Commissioners of LaPorte County, Indiana ("LaPorte County"), by and through the undersigned counsel, pursuant to 170 IAC 1-1.1.-11, petitions to intervene in this cause, and in support of this Petition states:

1. Petitioner, LaPorte County, is situated within the geographical bounds of the electric service area of Northern Indiana Public Service Company LLC ("NIPSCO"). The Board of Commissioners of LaPorte County, as a representative branch of county government, is mandated to serve the County's best interests, including providing oversight and services to its residential, commercial and industrial constituents who are NIPSCO ratepayers alike.

2. As a local governmental entity which is both a customer and in its capacity representing a large number of NIPSCO customers, LaPorte County has a substantial interest in the subject matter of these proceedings because the outcome of the proceedings will have a direct and significant impact upon its residents both directly, and indirectly through the need for and purchase of large quantities of electricity for its buildings and operations.

3. LaPorte County desires to stay informed of and address matters to be considered and determined by the Commission and intends to respond to and address the issues raised by NIPSCO in its petition at the evidentiary hearing scheduled in this cause.

4. The interests of the LaPorte County are not and will not be adequately represented by any other party to this proceeding.

5. This intervention will not unduly broaden issues or result in unreasonable delay and is made more than five days before any scheduled evidentiary hearing.

6. The undersigned attorneys, Shaw R. Friedman and Keith L. Beall, are duly authorized to file this petition on behalf of the LaPorte County and service of all papers in this cause should be directed to:

Shaw R. Friedman
Friedman & Associates, P.C.
705 Lincolnway
LaPorte, IN 46350
(219) 326-1264
sfriedman.associates@frontier.com

Keith L. Beall
Beall & Beall
13238 Snow Owl Dr., Ste. A
Carmel, IN 46033
(317) 810-9357
kbeall@indy.rr.com

WHEREFORE, LaPorte County respectfully requests that the Commission grant its petition to intervene and for all other relief appropriate in its premises.

Respectfully Submitted,

/s/ *Keith L. Beall*

Keith L. Beall (IN Atty #11907-49)
Beall & Beall
13238 Snow Owl Dr., Ste. A
Carmel, IN 46033
Phone: 317-810-9357
Email: kbeall@indy.rr.com

Shaw R. Friedman
Friedman & Associates, P.C.
705 Lincolnway
LaPorte, Indiana 46350
sfriedman.associates@frontier.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of March 2019, a copy of this "Petition to Intervene" filed on behalf of the LaPorte County has been served via electronic mail delivery to the following counsel of record:

OUC

Jeffrey M. Reed
Office of Utility Consumer Counselor
115 West Washington Street, Suite 1500S
Indianapolis, IN 46204
jreed@OUCC.in.gov
infomgt@oucc.in.gov

NIPSCO

Claudia J. Earls
NiSource Corporate Services - Legal
150 West Market Street, Suite 600
Indianapolis, Indiana 46204
cjearls@nisource.com

Michael Hooper
Erin E. Whitehead
Northern Ind. Public Service Co. LLC
150 West Market Street, Suite 600
Indianapolis, Indiana 46204
mhooper@nisource.com
ewhitehead@nisource.com

Nicholas K. Kile
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, IN 46204
nkile@btlaw.com

CAC

Jennifer A. Washburn
Margo L. Tucker
Citizens Action Coalition
603 East Washington Street, Suite 502
Indianapolis, IN 46204
jwashburn@citact.org
mtucker@citact.org

NLMK INDIANA

James W. Brew
Stone Mattheis Xenopoulos & Brew
1025 Thomas Jefferson St., NW,
9th Floor, West, Tower,
Washington, DC 20007
jbrew@smxblaw.com

WALMART

Eric E. Kinder

NIPSCO INDUSTRIAL GROUP

Bette J. Dodd
Todd A. Richardson
Joseph P. Rompala
Lewis & Kappes, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282
bdodd@lewis-kappes.com
trichardson@lewis-kappes.com
jrompala@lewis-kappes.com

NLMK INDIANA

Anne E. Becker
Lewis Kappes, P.C.
One American Square, Suite 2500
Indianapolis, IN 46282
abecker@lewis-kappes.com

US STEEL

Nikki G. Shoultz
Kristina Kern Wheeler
Jeffery A. Earl
Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis, Indiana 46204
nshoultz@boselaw.com
kwheeler@boselaw.com
jearl@boselaw.com

IN COAL COUNCIL

Robert L. Hartley, #7563-49
Carly J. Tebelman, #34796-49
201 N. Illinois St., Suite 1900
P.O. Box 44961
Indianapolis, IN 46244-0961
317-237-3800
Fax: 317-237-3900
rhartley@fbtlaw.com
ctebelman@fbtlaw.com

SPILMAN THOMAS & BATTLE, PLLC
300 Kanawha Boulevard, East
P.O. Box 273
Charleston, West Virginia 25321
ekinder@spilmanlaw.com

Barry A. Naum
SPILMAN THOMAS & BATTLE, PLLC
110 Bent Creek Boulevard, Suite 101
Mechanicsburg, Pennsylvania 17050
bnaum@spilmanlaw.com

PEABODY COALSALES, LLC

Joshua A. Claybourn
Chad Sullivan
JACKSON KELLY PLLC
221 NW Fifth Street
P.O. Box 1507
Evansville, Indiana 47706
jclaybourn@jacksonkelly.com
cjsullivan@jacksonkelly.com

ICARE

Meghan E. Griffiths
Jennifer A. Ferri
JACKSON WALKER LLP
100 Congress Ave., Suite 1100
Austin, Texas 78701
mgriffiths@jw.com
jferri@jw.com

MODERN FORGE

Alan M. Hux
TAFT STETTINIUS & HOLLISTER, LLP
One Indiana Square, Suite 3500
Indianapolis, Indiana 46204
ahux@taftlaw.com

/s/ Keith L. Beall