

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF NORTHERN)
INDIANA PUBLIC SERVICE COMPANY LLC)
FOR (1) APPROVAL OF AN ADJUSTMENT)
TO ITS GAS SERVICE RATES THROUGH)
ITS TRANSMISSION, DISTRIBUTION, AND)
STORAGE SYSTEM IMPROVEMENT)
CHARGE (“TDSIC”) RATE SCHEDULE; (2)) CAUSE NO. 44403-TDSIC-11
AUTHORITY TO DEFER 20% OF THE)
APPROVED CAPITAL EXPENDITURES AND)
TDSIC COSTS FOR RECOVERY IN)
PETITIONER’S NEXT GENERAL RATE)
CASE; AND (3) APPROVAL OF)
PETITIONER’S UPDATED 7-YEAR GAS)
PLAN, INCLUDING ACTUAL AND)
PROPOSED ESTIMATED CAPITAL)
EXPENDITURES AND TDSIC COSTS THAT)
EXCEED THE APPROVED AMOUNTS IN)
CAUSE NO. 44403-TDSIC-10, ALL)
PURSUANT TO IND. CODE § 8-1-39-9.)

PETITION TO INTERVENE

Come now certain intervenors designated collectively as a part of 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 gas service territory of Northern Indiana Public Service Company (“NIPSCO”), including the companies listed on Appendix “A,” which is attached to this Petition. 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 gas transportation service 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 NIPSCO should provide gas transportation 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 gas transportation costs in their industrial operations, members of the Industrial Group are substantially affected by the cost of gas transportation service provided by NIPSCO. The intervention by members of 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. 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 the attached Appendix "A."

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

Todd A. Richardson, Atty No. 16620-49
Aaron A. Schmoll, Atty No. 20359-49
One American Square, Suite 2500
Indianapolis, Indiana 46282-0003
Telephone: (317) 639-1210
Facsimile: (317) 639-4882
Email: TRichardson@lewis-kappes.com
ASchmoll@lewis-kappes.com

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 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," respectfully request that they be granted leave to intervene and be made parties to this proceeding.

Respectfully submitted,

LEWIS & KAPPES, P.C.

/s/ Aaron A. Schmoll

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Indianapolis, Indiana 46282-0003
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ASchmoll@lewis-kappes.com

APPENDIX "A"

<p>ARCELORMITTAL USA 3300 Dickey Road MC 4-442 East Chicago, Indiana 46312</p> <p>PRAXAIR, INC. 4400 Kennedy Avenue East Chicago, Indiana 46312</p>	<p>UNITED STATES STEEL CORPORATION Gary Works One North Broadway Gary, IN 46402</p> <p>USG CORPORATION 301 Riley Rd. East Chicago, Indiana 46312</p>
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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 1st day of May, 2020:

Christopher C. Earle
NISOURCE CORPORATE SERVICES – LEGAL
150 West Market Street, Suite 600
Indianapolis, IN 46204
cearle@nisource.com

Jeffrey M. Reed
Randall C. Helmen
OFFICE OF UTILITY CONSUMER COUNSELOR
115 West Washington Street, Suite 1500 South
Indianapolis, IN 46204
jreed@oucc.in.gov
rhelmen@oucc.in.gov
infomgt@oucc.in.gov

Courtesy copy to:
Alison M. Becker
NORTHERN INDIANA PUBLIC SERVICE CO.
150 West Market Street, Suite 600
Indianapolis, IN 46204
abecker@nisource.com

/s/ Aaron A. Schmoll

Aaron A. Schmoll

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Indianapolis, Indiana 46282-0003
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Facsimile: (317) 639-4882