

**STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION**

**PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC FOR (1) AUTHORITY)
TO MODIFY ITS)
RATES AND CHARGES FOR GAS)
UTILITY SERVICE THROUGH A PHASE IN OF)
RATES; (2) APPROVAL OF NEW SCHEDULES)
OF RATES AND CHARGES, GENERAL RULES,)
AND REGULATIONS, AND RIDERS;)
(3) APPROVAL OF REVISED)
DEPRECIATION RATES)
APPLICABLE TO ITS GAS PLANT IN)
SERVICE; (4) APPROVAL OF MECHANISM TO)
MODIFY RATES PROSPECTIVELY FOR)
CHANGES IN FEDERAL OR STATE INCOME)
TAX RATES, UTILITY RECEIPTS TAX RATES,)
AND PUBLIC UTILITY FEE RATES; (5))
APPROVAL OF NECESSARY)
AND APPROPRIATE ACCOUNTING RELIEF;)
AND (6) AUTHORITY TO IMPLEMENT)
TEMPORARY RATES CONSISTENT WITH THE)
PROVISIONS OF IND. CODE § 8-1-2-42.7.)**

CAUSE NO. 45621

**PETITION TO INTERVENE OF UNITED STEEL, PAPER AND FORESTRY, RUBBER,
MANUFACTURING, ENERGY, ALLIED INDUSTRIAL AND SERVICE WORKERS
INTERNATIONAL UNION, AFL-CIO/CLC AND ITS LOCALS 12775 AND 13796**

Pursuant to 170 I.A.C. 1-1.1-11, the United Steel, Paper and Forestry, Rubber,
Manufacturing, Energy, Allied Industrial and Service Workers International Union AFL-
CIO/CLC (“USW”) and its Locals 12775 and 13796 (“Local Unions”) (collectively “Union”), by
representative, respectfully request that the Indiana Utility Regulatory Commission
 (“Commission”) permit the Union to intervene and become a party to this Cause. In support of
its Petition, the Union asserts the following:

1. USW is an international union with 16 locals in Indiana. Northern Indiana Public Service Company (“NIPSCO”) employs approximately 2,000 USW members. Approximately 40,000 USW members reside in NIPSCO’s service area.
2. The purpose of this proceeding is for NIPSCO to request an increase in its retail rates and charges for gas utility service; approval of new schedules of rates and charges, general rules and regulations, and riders; approval of revised depreciation rates; approval of a mechanism to modify rates prospectively; approval of accounting relief; and authority to implement temporary rates.
3. The Union represents approximately 2,000 NIPSCO employees who have a substantial interest in this proceeding. NIPSCO’s operating expenses include the salaries and benefits of Union members. In addition, Union members employed at NIPSCO are affected by the changing energy marketplace. Therefore, the outcome of this proceeding directly affects the members’ terms and conditions of employment.
4. The Union has approximately 40,000 members residing in NIPSCO’s service area. Many of these members and their families are residential retail customers of NIPSCO. They have a substantial interest in this proceeding because they pay NIPSCO rates for residential gas service and are dependent upon NIPSCO facilities, equipment, and personnel to receive that service.
5. The interests of the Union are not, and will not be, adequately represented by any other party in this proceeding.
6. The contact information of the Union’s representative is as follows:

Anthony Alfano, Indiana Attorney No. 22254-45
United Steelworkers
1301 Texas St., 2nd Floor
Gary, IN 46402

Phone: 219-881-6222
Fax: 219-886-8686
Email: aalfano@usw.org

7. Parties and Commission staff wishing to serve papers on the Union's representative in this Cause should use the addresses above.
8. The addition of the Union as a party to this Cause will not unduly broaden the issue or otherwise burden or unreasonably delay the proceedings. The Union understands that it is bound by all rulings and other matters of record prior to the time that this Petition is granted, and the Union takes the case as it finds it as of the date of intervention.
9. The Union is filing this Petition to Intervene more than five days prior to any date set for the initial evidentiary hearing in this proceeding.
10. For the foregoing reasons, the Union respectfully requests that the Commission grant it leave to intervene and make the Union a party to this proceeding.

The undersigned Anthony Alfano has been duly authorized to file this petition to intervene with the Commission on behalf of the Union.

Respectfully submitted,

s/ Anthony Alfano

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served by electronic mail on DATE on the following parties:

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s/ Anthony Alfano
Anthony Alfano

Dated: February 25, 20