

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF THE CITY OF EAST CHICAGO,)
INDIANA FOR AUTHORITY TO ISSUE)
BONDS, NOTES OR OTHER OBLIGATIONS)
FOR AUTHORITY TO INCREASE ITS RATES)
AND CHARGES FOR WATER SERVICE, AND) CAUSE NO. 45827
FOR APPROVAL OF NEW SCHEDULES OF)
WATER RATES AND CHARGES.)

INDUSTRIAL GROUP’S PETITION TO INTERVENE

Come now certain intervenors designated collectively as the City of East Chicago Indiana Industrial Group (“Industrial Group”), by counsel, and file their Petition to Intervene in the above-captioned proceeding and, in support thereof, state the following:

1. Petitioner, the City of East Chicago, Indiana (“City of East Chicago”) filed its Petition in the above-captioned matter on December 12, 2022.
2. Appendix A to this Petition is a list of the companies that comprise the Industrial Group. It is possible that additional customers will join the Industrial Group and Appendix A will be amended to reflect additions as they occur.
3. As industrial customers of the City of East Chicago, members of the Industrial Group are reliant upon the City of East Chicago for consistent, reliable and reasonably priced utility service to support their respective operations. As a consequence, they have a direct, immediate, and substantial interest in the subject matter of this proceeding.
4. Because of the importance of water in their industrial operations, members of the Industrial Group are substantially affected by the cost of water service provided by the City of East Chicago. The intervention by members of the Industrial Group in this proceeding is for the

purpose of responding to those issues raised by the City of East Chicago's petition or required by law to be determined by the Commission in this proceeding and all issues related thereto.

5. The Industrial Group is not adequately represented by any other party to this proceeding.

6. The intervention of the Industrial Group will not unduly broaden the issues being addressed in this proceeding nor result in an unreasonable delay.

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

Joseph P. Rompala, Atty. No. 25078-49
Aaron A. Schmoll, Atty. No. 20359-49
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WHEREFORE, the members of the Industrial Group request the Commission for leave to intervene and to be made a party of record in the above-captioned matter and for all other just and proper relief.

Respectfully submitted,

LEWIS & KAPPES, P.C.

/s/ Aaron A. Schmoll

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APPENDIX “A”

CLEVELAND-CLIFFS INC. 3300 Dickey Road East Chicago, Indiana 46312 LINDE 4400 Kennedy Avenue East Chicago, Indiana 46312	USG CORPORATION 301 Riley Road East Chicago, Indiana 46312
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following via electronic mail, this 25th day of January, 2023:

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