

BEFORE THE

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED JOINT PETITION OF DUKE ENERGY )  
INDIANA, LLC, INDIANA GAS COMPANY D/B/A )  
VECTREN ENERGY DELIVERY OF INDIANA, )  
INC., INDIANA MICHIGAN POWER COMPANY, )  
INDIANA NATURAL GAS CORPORATION, )  
INDIANAPOLIS POWER & LIGHT COMPANY, )  
MIDWEST NATURAL GAS CORPORATION, )  
NORTHERN INDIANA PUBLIC SERVICE )  
COMPANY, LLC, OHIO VALLEY GAS CORP. )  
AND OHIO VALLEY GAS, INC., SOUTHERN )  
INDIANA GAS & ELECTRIC COMPANY D/B/A )  
VECTREN ENERGY DELIVERY OF INDIANA, )  
INC., AND SYCAMORE GAS COMPANY FOR )  
(1) AUTHORITY FOR ALL JOINT PETITIONERS )  
TO DEFER AS A REGULATORY ASSET )  
CERTAIN INCREMENTAL EXPENSE )  
INCREASES AND REVENUE REDUCTIONS OF )  
THE UTILITY ATTRIBUTABLE TO COVID-19; )  
AND (2) THE ESTABLISHMENT OF SUB- )  
DOCKETS FOR EACH JOINT PETITIONER IN )  
WHICH EACH JOINT PETITIONER MAY )  
ADDRESS REPAYMENT PROGRAMS FOR PAST )  
DUE CUSTOMER ACCOUNTS, APPROVAL OF )  
NEW BAD DEBT TRACKERS AND/OR DETAILS )  
CONCERNING THE FUTURE RECOVERY OF )  
THE COVID-19 REGULATORY ASSET. )

CAUSE NO. 45377

PETITION OF INDIANA OFFICE OF UTILITY )  
CONSUMER COUNSELOR FOR GENERIC )  
INVESTIGATION INTO COVID-19 IMPACTS )  
TO BE CONDUCTED OVER TWO PHASES; )  
EMERGENCY RELIEF PURSUANT TO IND. )  
CODE § 8-1-2-113 TO RELIEVE INDIANA )  
RATEPAYERS OF THE THREAT OF UTILITY )  
SERVICE DISCONNECTION AND PAYMENT )  
ARREARAGES DURING GLOBAL HEALTH )  
AND ECONOMIC CRISIS. )

CAUSE NO. 45380

INDIANA INDUSTRIAL GROUP’S PETITION TO INTERVENE

The Indiana Industrial Group (“Industrial Group”), by counsel, files its Petition to Intervene in the above-captioned proceeding pursuant to IAC 1-1.1-11 and, in support thereof, states the following:

1. The Industrial Group is a group of industrial customers with various facilities located in the State of Indiana (“State”) including the companies listed on Appendix “A”, which is attached. Additional members may be joining the Industrial Group for the purpose of this proceeding in which event the Commission will be notified.

2. As industrial customers, the members of the Industrial Group are large volume consumers of utility services including electric energy, natural gas, and water and wastewater. Such utility services are essential for the operation of the Member’s facilities and integral to their production processes. Members of the Industrial Group are substantially affected by the cost of utility services. Utility services are provided to the members of the Industrial Group, directly or indirectly, by the public utilities within the State as well as other jurisdictional and non-jurisdictional utilities. As such, the members of the Industrial Group have a direct, immediate, and substantial interest in the subject matter of this proceeding which will resolve, among other issues, the potential recovery of regulatory assets created through the deferred accounting treatment sought as relief.

3. The intervention by the Industrial Group in this proceeding is for the purpose of participating in and responding, if necessary, to those issues raised by the Commission’s investigation, the positions taken by other participants in the proceeding, or required by law to be determined by the Commission in this proceeding, and all related issues.

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

5. The Industrial Group's intervention will not unreasonably broaden the issues involved in this proceeding.

6. The attorneys representing the Industrial Group in this proceeding are:

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The above-named attorneys are authorized to accept service of papers in the proceeding on behalf of the Industrial Group.

7. This Petition to Intervene is being filed more than five days prior to any date set for the initial evidentiary hearing on the merits in this proceeding.

WHEREFORE, the Industrial Group respectfully requests that it be granted leave to intervene and to be made a party to the above-captioned proceeding.

Respectfully submitted,

LEWIS & KAPPES, P.C.

/s/ Joseph P. Rompala

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## APPENDIX “A”

**AIR PRODUCTS & CHEMICALS, INC.**  
4590 County Road 59  
Butler, Indiana 46721

**ALLISON TRANSMISSION**  
One Allison Way  
Indianapolis, Indiana 46222

**ARCELORMITTAL USA**  
3300 Dickey Road  
East Chicago, Indiana 46312

**COUNTRYMARK REFINING AND LOGISTICS, LLC**  
1200 Refinery Road  
Mt. Vernon, Indiana 47620

**ELI LILLY & COMPANY**  
Lilly Corporate Center  
Indianapolis, Indiana 46285

**FIAT CHRYSLER AUTOMOBILES**  
3660 N. Highway 31  
Kokomo, Indiana 46901

**HAYNES INTERNATIONAL, INC.**  
1020 West Park Avenue  
PO Box 9013  
Kokomo, Indiana 46904-9013

**MARATHON PETROLEUM COMPANY LP**  
539 South Main Street  
Findlay, Ohio 45840

**MESSER LLC**  
7996 North State Road 39  
LaPorte, Indiana 46350

**PRAXAIR, INC.**  
4400 Kennedy Avenue  
East Chicago, Indiana 46312

**SUBARU OF INDIANA AUTOMOTIVE INC.**  
5500 State Road 38 East  
PO Box 5689  
Lafayette, Indiana 47903

**UNITED STATES STEEL CORPORATION**  
Gary Works  
One North Broadway  
Gary, Indiana 46402

**USG CORPORATION**  
301 Riley Road  
East Chicago, Indiana 46312

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served upon the following via electronic mail, this 20<sup>th</sup> day of May, 2020:

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