

6. Hebron was not provided nor did it receive any written notice, informal or otherwise notice from Winfield or its attorneys of the passage of Winfield's Regulatory Ordinance at issue in this Cause or the filing of this IURC Cause seeking approval of that Ordinance.
7. Hebron and its counsel did not learn of this Cause until, April 12, 2024.
8. The law firm of of the local attorney representing Winfield in this cause also represents the same major developer with whom Hebron has agreed to provide sewer and water service in the area claimed by Winfield and another law firm from Indianapolis, who represents Winfield in this matter also represent Hebron in certain legal matters. Yet no one gave Hebron noitice of the filing of this Cause.
9. Hebron is better suited, located and is prepared to provide sewer service to the areas of development on the eastern side of area claimed by Winfield.
10. Winfield's failure to give notice to Hebron of the passage of Winfield's Regulatory Ordinance and of filing this Cause severely prejudices Hebron, and Hebron's plans to provide water and sewer service to the affected areas.
11. Hebron has s relevant information regarding Winfield's proposals and Hebron's commitments to service that will be helpful to the Commission.
12. Hebron is affected by Winfield's proposals in this Cause and will not be adequately represented by any other Party in this Cause.
13. Hebron's intervention will not unnecessarily broaden the issues in this Cause.
14. Hebron's participation in this Cause will bring import information to the Commission on the relevant statutorily required issues in this Regulatory Ordinance case.

15. This Petition is timely filed more than 5 days before the scheduled evidentiary hearing in this Cause.

WHEREFORE, the TOWN of Hebron respectfully requests that it be granted intervention as a Party in this proceeding and for all other relief appropriate in the premises.

Respectfully submitted,

/s/ Brett R. Galvan

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petition to Intervene was served upon the following by electronic delivery this 18th day of April 2024, to:

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