

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF ALLEGHENY) ss:
)

JENNINGS R. LAMBETH, being first duly sworn, deposes and says:

1. That he is Senior Vice President of Youngstown Sheet and Tube Company ("Youngstown"), a corporation duly organized and existing under and by virtue of the laws of the State of Ohio, with its executive offices at 3 Gateway Center, City of Pittsburgh, County of Allegheny, Commonwealth of Pennsylvania, and in whose behalf he makes this affidavit.

2. That he is informed and believes, and on such information and belief, and in good faith, states the following:

(i) Youngstown owns an integrated steel mill in East Chicago, Indiana known as the Indiana Harbor Works.

(ii) The Northern Indiana Public Service Company ("NIPSCO") provides services to the Indiana Harbor Works.

(iii) From time to time, Youngstown has provided information on a confidential basis to NIPSCO concerning power needs and uses and operating configurations of the Indiana Harbor Works.

(iv) This confidential information, if it were made known to Youngstown's competitors, would allow those competitors

to use the information to Youngstown's economic disadvantage.

Jennings R. Lambeth
Jennings R. Lambeth

Subscribed and sworn to before me by the said Jennings R.
Lambeth this 26th day of May, 1981.

Mary C. Connell
Notary Public

MARY C. CONNELL, Notary Public
Pittsburgh, Allegheny Co., PA
My Commission Expires January 2, 1984