

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 infor-  
mation 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