

333 OAK LANE
BLOOMSBURG, PA 17815
SCOTT.J.RUBIN@GMAIL.COM

SCOTT J. RUBIN
ATTORNEY • CONSULTANT

TEL: (570) 387-1893
FAX: (570) 387-1894
CELL: (570) 850-9317

April 9, 2018

Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg PA 17105-3265

Re: Pa. PUC v. Duquesne Light Co.
Docket No. R-2018-3000124

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of Electrical Workers Local 29 in the above-referenced proceeding. The document was served on all parties of record as shown on the attached Certificate of Service.

The document was filed electronically with the Commission on this date.

Sincerely,



Enclosure

cc: Hon. Katrina L. Dunderdale, ALJ
All parties of record

4. On March 28, 2018, Duquesne filed a request for a base rate increase of approximately \$133.8 million. Net of changes in surcharges, the resulting increase would be approximately \$81.6 million.

5. IBEW anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of Duquesne's employees and retirees and as a customer of Duquesne. For example, Duquesne's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among others. In addition, issues may be raised by various parties concerning the safety or reliability of Duquesne's service that will or may have a direct effect on IBEW and its members.

6. No other party to this proceeding represents the interests of IBEW and its members.

7. IBEW intends to actively participate in this proceeding on such matters that affect its interests as a customer of Duquesne and the interests of its members as employees and retirees of Duquesne. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by Duquesne and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers, Local 29 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



Scott J. Rubin (PA Atty. Id. 34536)
333 Oak Lane
Bloomsburg, PA 17815-2036
Voice: 570-387-1893
Email: scott.j.rubin@gmail.com

Counsel for:
IBEW Local 29

Dated: April 9, 2018

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-2018-3000124
Duquesne Light Company :

VERIFICATION

I, Kenn Bradley, the Business Manager of International Brotherhood of Electrical Workers, Local 29, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 4-6-2018

Kenn Bradley

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties by electronic mail (where an email address is shown) and first class mail.

MICHAEL W GANG / ANTHONY D KANAGY
POST & SCHELL PC
17 NORTH SECOND ST, 12th FL
HARRISBURG PA 17101-1601
mgang@postschell.com, akanagy@postschell.com, srosario@postschell.com,

DAVID T FISFIS / TISHEKIA E WILLIAMS / MICHAEL ZIMMERMAN
DUQUESNE LIGHT COMPANY
411 SEVENTH AVENUE
PITTSBURGH PA 15219
twilliams@duqlight.com, editommaso@duqlight.com, mzimmerman@duqlight.com,

PHILLIP DEMANCHICK / DAVID EVRARD
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET 5TH FLOOR
HARRISBURG PA 17101
pdemanchick@paoca.org, devrard@paoca.org,

DANIEL G ASMUS
OFFICE OF SMALL BUSINESS ADVOCATE
300 NORTH SECOND ST, SUITE 202
HARRISBURG PA 17101
dasmus@pa.gov,

GINA L MILLER / JOHN M COOGAN
PA PUBLIC UTILITY COMMISSION
BUREAU OF INVESTIGATION & ENFORCEMENT
PO BOX 3265
HARRISBURG PA 17105-3265
ginmiller@pa.gov, wfreet@pa.gov, jcoogan@pa.gov,

4/9/2018
Date



Scott J. Rubin, Counsel for IBEW Local 29