

May 24, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**Re: Pennsylvania Public Utility Commission v. Duquesne Light Company;
Docket No. R-2021-3024750**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of United States Steel Corporation ("U.S. Steel"), in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Derrick Price Williamson
Barry A. Naum

BAN/sds
Enclosures

c: Deputy Chief Administrative Law Judge Joel H. Cheskis (via E-mail)
Administrative Law Judge John M. Coogan (via E-Mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|--|---|---------------------------|
| Pennsylvania Public Utility Commission | : | |
| | : | |
| v. | : | Docket No. R-2021-3024750 |
| | : | |
| Duquesne Light Company | : | |

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

VIA E-MAIL

cott B. Granger, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov

Christy M. Appleby, Esquire
Phillip D. Demanchick, Esquire
David T. Evrard, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
cappleby@paoca.org
pdemanchick@paoca.org
devrard@paoca.org
abeatty@paoca.org

Sharon E. Webb, Esquire
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101
swebb@pa.gov

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com

Tishekia E. Williams, Esquire
Michael Zimmerman, Esquire
Emily Farah, Esquire
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219
twilliams@duqlight.com
mzimmerman@duqlight.com
efarah@duqlight.com


Certificate of Service
Docket No. R-2021-3024750
Page 2

Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Lauren N. Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com

Mark C. Szybist, Esquire
Natural Resources Defense Council
1152 15th Street NW, Suite 300
Washington, DC 20005
mszybist@nrdc.org

Andrew J. Karas, Esquire
Sophia Al Rasheed, Esquire
Fair Shake Environmental Legal Services
600 Superior Avenue East
Cleveland, OH 44114
akaras@fairshake-els.org
salrasheed@fairshake-els.org



Barry A. Naum

Dated: May 24, 2021

increase in the Company's electric distribution rates of approximately \$115 million to be effective June 15, 2021. The Company is also requesting a return on equity ("ROE") of 10.95 percent.

4. U. S. Steel, headquartered in Pittsburgh, Pennsylvania, is an integrated steel producer with major production operations in the United States and Central Europe, and an annual raw steelmaking capability of 26.2 million net tons, approximately 21.2 million net tons produced in the United States. U. S. Steel manufactures a wide range of value-added steel sheet and tubular products for the automotive, appliance, container, industrial machinery, construction, and oil and gas industries, and employs nearly 4,000 full-time employees at its numerous facilities in and throughout Pennsylvania, with significant operations located within Duquesne's service territory, including its Mon Valley Works, which consists of the Clairton Plant, Edgar Thomson Plant, and Irvin Plant, Research and Technology Center, and Pittsburgh Service Center in Allegheny County. Controlling the costs associated with the production of steel, including the considerable energy costs related to its operations, is of critical importance to U. S. Steel. The cost of electricity comprises a significant portion of U.S. Steel's operating costs.

5. In that regard, U. S. Steel annually consumes many millions of kWh delivered by Duquesne, making U. S. Steel one of the largest customers on the Company's system. Specifically, U. S. Steel currently takes electric distribution service from Duquesne under a number of accounts, including primarily the Company's Rate Schedules HVPS, GL, and L. Accordingly, the cost, reliability, and quality of the electric distribution service provided by Duquesne are issues of significant concern to U. S. Steel.


6. The Commission's final determination in this proceeding may directly impact the terms and conditions of electric service that U.S. Steel receives from the Company at multiple locations. U.S. Steel therefore has a direct, substantial, and unique interest in the outcome of this

proceeding that is not presented by any other party. The resolution of Duquesne's proposed rate increase, including any changes to the Company's current tariff that other parties might propose, could have a direct impact on U. S. Steel's interests, which are not adequately represented by existing participants in the case. Given the substantial economic and employment benefit that U.S. Steel provides in the Duquesne service territory and the surrounding region of Pennsylvania, U.S. Steel's interests are of such a nature that its participation in this case is in the public interest. See 52 Pa. Code § 5.72(a)(2) & (3).

WHEREFORE, United States Steel Corporation requests that the Commission grant this Petition to Intervene and provide U.S. Steel with full party status in this proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 
Derrick Price Williamson (Pa. I.D. No. 69274)
Barry A. Naum (Pa. I.D. No. 204869)
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2740
Fax: (717) 795-2743
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com


Counsel to United States Steel Corporation

Dated: May 24, 2021

VERIFICATION

I, Barry A. Naum, Counsel to United States Steel Corporation, hereby states that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: May 24, 2021


Barry A. Naum