

Eberle & Bundick, LLC

A Workers Rights Law Firm

Robert A. Eberle, Esq.
Amanda B. Bundick, Esq.

amanda@eblaborlaw.com

(240) 818-1108

June 14, 2021

VIA ELECTRONIC FILING

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

Re: Pennsylvania Public Utility Commission v. Duquesne Light Company
Docket No. R-2021-3024750
Petition to Intervene of IBEW Local 29

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of IBEW Local 29 in the above-referenced proceeding. An electronic copy of this filing will be provided to those listed on the Certificate of Service.

If you have any questions or concerns, please contact me.

Very truly yours,



Amanda B. Bundick, Esq.

Encls.

cc: Deputy Chief Administrative Law Judge Joel H. Cheskis
Chief Administrative Law Judge John M. Coogan
Certificate of Service



phone: 1-800-991-9270 | fax: (412) 489-0174 | www.eblaborlaw.com
P.O. Box 44290, Pittsburgh, PA 15205

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PETITION TO INTERVENE
OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO, LOCAL UNION 29**

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, the International Brotherhood of Electrical Workers, AFL-CIO, Local Union 29 (“IBEW Local 29”), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, IBEW Local 29 states as follows:

1. IBEW Local 29 is the exclusive bargaining representative for a bargaining unit of approximately 850 employees of Duquesne Light Company (“Duquesne Light”). IBEW Local 29 is also a customer of Duquesne Light at IBEW Local 29’s office located at 986 Greentree Rd., Pittsburgh, PA 15220.

2. IBEW Local 29 will be represented in this case by, and all documents should be served upon, its attorneys:

Robert A. Eberle, Esq.
Eberle & Bundick, LLC
P.O. Box 44290
Pittsburgh, PA 15205
Pa. Atty. ID #47359
Ph. (412) 368-5541
Email: bob@eblaborlaw.com

Amanda B. Bundick, Esq.
Eberle & Bundick, LLC
P.O. Box 44290
Pittsburgh, PA 15205
Pa. Atty. ID #316622
Ph. (240) 818-1108
Email: amanda@eblaborlaw.com

3. Pursuant to 52 Pa. Code § 1.54(b)(3), the undersigned counsel consent to the electronic service of all documents at the e-mail addresses shown above.

4. On April 16, 2021, Duquesne Light filed with the Pennsylvania Public Utilities Commission Supplement No. 25 to Duquesne Light's Tariff Electric – Pa. P.U.C. No. 25, requesting a base rate increase in Duquesne Light's electric distribution rates of approximately \$115 million.

5. IBEW Local 29 anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of Duquesne Light's employees and retirees and as a customer of Duquesne Light. For example, Duquesne Light'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 Light's service that will or may have a direct effect on IBEW Local 29 and its members employed by Duquesne Light.

6. No other party to this proceeding represents the interests of IBEW Local 29 and its members.

7. IBEW Local 29 intends to actively participate in this proceeding on such matters that affect its interests as a customer of Duquesne Light and the interests of its members as employees and retirees of Duquesne Light. Such participation may include the presentation of direct or

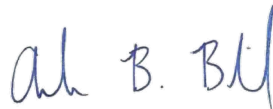
rebuttal testimony and the cross-examination of witnesses presented by Duquesne Light and other parties to this proceeding.

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

Respectfully submitted,



Robert A. Eberle, Esq.
Eberle & Bundick, LLC
P.O. Box 44290
Pittsburgh, PA 15205
Pa. Atty. ID #47359
Ph. (412) 368-5541
Email: bob@eblaborlaw.com



Amanda B. Bundick, Esq.
Eberle & Bundick, LLC
P.O. Box 44290
Pittsburgh, PA 15205
Pa. Atty. ID #316622
Ph. (240) 818-1108
Email: amanda@eblaborlaw.com

Counsel for: IBEW Local 29

Dated: June 14, 2021

**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 a true and correct copy of the foregoing document has been served upon the following persons by electronic mail:

The Honorable Joel H. Cheskis
The Honorable John M. Coogan
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
jcheskis@pa.gov
jcoogan@pa.gov

Michael Zimmerman, Esquire
Tishekia Williams, Esquire
Emily M. Farah, Esquire
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
mzimmerman@duqlight.com
twilliams@duqlight.com
efarah@duqlight.com

James Davis, Esquire
Duquesne Light
411 Seventh Avenue
Pittsburgh, PA 15219
jdavis@duqlight.com

Anthony D. Kanagy, Esquire
Michael W. Gang, Esquire
17 North Second Street, 12th Floor
Harrisburg, PA 17101
akanagy@postschell.com
mgang@postschell.com
Representing Duquesne Light Company

Scott B. Granger, Esquire
PA PUC Bureau of Investigation and
Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
sgranger@pa.gov

Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
John Sweet, Esquire
Lauren N. Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101-1414
rpereirapulp@palegalaid.net
emarxpulp@palegalaid.net
jsweetpulp@palegalaid.net
lbermanpulp@palegalaid.net
pulp@palegalaid.net

Sharon E. Webb, Esquire
Assistant Small Business Advocate
Office of Small Business Advocate555
Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Christy M. Appleby, Esquire
Phillip D. Demanchick, Esquire
David T. Evrard, Esquire
Aron J. Beatty, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org
pdemanchick@paoca.org devrard@paoca.org
abeatty@paoca.org
tmccloskey@paoca.org

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

Sophia Al Rasheed, Esquire
Fair Shake Environmental Legal Services
600 Superior Ave. East, Suite 1300
Cleveland, OH 44114
salrasheed@fairshake-els.org

Mark C. Szybist
Natural Resources Defense Council1152 15th
Street NW, Suite 300
Washington, DC 20005
mszybist@nrdc.org

Andrew J. Karas, Esquire
Fair Shake Environmental Legal Services
647 E. Market Street
Akron, OH 44304
akaras@fairshake-els.org

Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

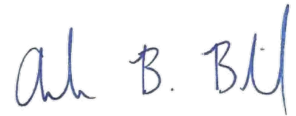
Karen O. Moury, Esquire
Eckert Seamans
213 Market Street
Harrisburg, PA 17101
kmoury@eckertseamans.com

Lauren M. Burge, Esquire
Eckert, Seamans, Cherin & Mellot, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com

John F. Povilaitis, Esquire
Buchanan Ingersol & Rooney
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
John.Povilaitis@BIPC.com

William H. Roberts, II, Esquire
Michael Turzai, Esquire
Peoples Gas Company, LLC
375 North Shore Drive, Suite 600
Pittsburgh, PA 15212
william.h.roberts@peoples-gas.com
michael.turzai@peoples-gas.com

Date: June 14, 2021



Amanda B. Bundick, Esq.
Eberle & Bundick, LLC
P.O. Box 44290
Pittsburgh, PA 15205
Pa. Atty. ID #316622
Ph. (240) 818-1108
amanda@eblaborlaw.com