

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, 2013

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

Re: Joint application of Peoples Natural Gas Company,  
LLC, Peoples TWP, LLC and Equitable Gas  
Company, LLC for all of the authority and the  
necessary certificates of public convenience  
Docket Nos. A-2013-2353647, A-2013-2353649,  
and A-2013-2353651

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of Utility Workers Union of  
America, Local 666, in the above-referenced proceeding.

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

Sincerely,



Enclosure

cc: All parties per Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint application of Peoples Natural Gas Company,	:	
LLC, Peoples TWP, LLC and Equitable Gas	:	
Company, LLC for all of the authority and the	:	
necessary certificates of public convenience: 1) to	:	
transfer all of the issued and outstanding limited	:	
liability company membership interest of Equitable	:	
Gas Company, LLC to PNG Companies, LLC; 2) to	:	
merge Equitable Gas Company, LLC with Peoples	:	
Natural Gas Company, LLC; 3) to transfer certain	:	Docket No. A-2013-2353647
storage and transmission assets of Peoples Natural	:	Docket No. A-2013-2353649
Gas Company, LLC to affiliates of EQT	:	Docket No. A-2013-2353651
Corporation; 4) to transfer certain assets between	:	
Equitable Gas Company, LLC and affiliates of EQT	:	
Corporation; 5) for approval of certain ownership	:	
changes associated with the transaction; 6) for	:	
approval of certain associated gas capacity and	:	
supply agreements; and 7) for approval of certain	:	
changes in the tariff of Peoples Natural Gas	:	
Company, LLC	:	

---

PETITION TO INTERVENE OF  
UTILITY WORKERS UNION OF AMERICA, LOCAL 666

---

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, the Utility Workers Union of America, Local 666 (Local 666) hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, Local 666 states as follows:

1. Local 666 is the authorized collective bargaining representative for more than 400 employees of Peoples Natural Gas Company, LLC (“Peoples”), most of whom are also customers of Peoples.
2. UWUA’s mailing address is: 1533 Broad St., Suite 3, Greensburg, PA 16201.
3. UWUA will be represented by, and all documents should be served upon, its counsel:

Scott J. Rubin (PA Supreme Court Id. 34536)  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
Voice: 570-387-1893  
Fax: 570-387-1894  
Email: scott.j.rubin@gmail.com

4. Pursuant to 52 Pa. Code §§ 1.53 and 1.54, counsel consents to the service of all documents by electronic mail.
5. This proceeding concerns the proposed merger of Equitable Gas Company, LLC (“Equitable”), with and into Peoples, as well as related transactions, as set forth in the Application.
6. Local 666 desires to participate in this proceeding to ensure that its interests and the interests of its members, as employees and/or customers of Peoples, are fully protected and represented in this matter. Local 666 anticipates issues being raised in this proceeding that will or may affect its interests as a representatives of its members’ interests, including but not limited to the impact of the proposed transaction on Peoples’s employees.
7. The Application raises several issues that will affect the members of Local 666, including, but not limited to, proposals to (a) consolidate the field operations and offices of Peoples and Equitable, (b) consolidate leak detection and One-Call processes, (c) reduce capital spending and maintenance in areas where both utilities have distribution facilities, and (d) have employees of one utility perform work on the other utility’s facilities.
8. The Commission is required to consider the “effect of the proposed merger ... on the employees of the natural gas distribution company and on any authorized collective bargaining agent representing those employees.” 66 Pa. C.S. § 2210(a)(2).

9. No other party represents the interests of Local 666 in this proceeding or can speak for Local 666 as to the effects of the proposed transaction on Local 666 and its members.

10. Local 666 intends to actively participate in this proceeding on such matters that affect its interests. Such participation may include conducting discovery, presenting testimony, cross-examining witnesses, and filing briefs and other pleadings.

WHEREFORE, Utility Workers Union of America, Local 666, respectfully requests the right to intervene in this proceeding.

Respectfully submitted,



Scott J. Rubin, Esq. (Pa. Supreme Court Id. 34536)  
333 Oak Lane  
Bloomsburg, PA 17815-2036

Phone: 570-387-1893

Fax: 570-387-1894

email: scott.j.rubin@gmail.com

Counsel for:

Utility Workers Union of America, Local 666

Dated: April 9, 2013

---

VERIFICATION

---

I, Gerald Powers, the President of Utility Workers Union of America, Local 666, 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: April 8, 2013

Gerald M. Powers

---

CERTIFICATE OF SERVICE

---

I hereby certify that I have this day served a true copy of the foregoing upon the following parties to this proceeding by electronic mail and first class mail.

John F. Povilaitis / Alan M. Seltzer  
Buchanan Ingersoll and Rooney PC  
409 North Second St., Suite 500  
Harrisburg, PA 17101-1357  
John.Povilaitis@bipc.com  
Alan.Seltzer@bipc.com

David W. Gray, General Counsel  
Equitable Gas Company LLC  
225 North Shore Drive, 3<sup>rd</sup> Floor  
Pittsburgh, PA 15222  
dgray@equitablegas.com

Darryl Lawrence  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
dlawrence@paoca.org

Michael Gang / Christopher T Wright  
Post & Schell PC  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
mgang@postschell.com  
cwright@postschell.com

Allison Kaster  
Bureau of Investigation & Enforcement  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
akaster@pa.gov

Sharon Webb  
Office of Small Business Advocate  
300 North Second St., Suite 1102  
Harrisburg, PA 17101  
swebb@pa.gov



---

Scott J. Rubin  
Counsel for UWUA Local 666

Dated: April 9, 2013