

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

May 3, 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 Prehearing Memorandum of International Brotherhood of Electrical Workers, Local 1956, in the above-referenced proceeding.

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

Sincerely,  


Enclosure

cc: Mark A. Hoyer, Administrative Law Judge  
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 : Docket No. A-2013-2353647  
transfer certain storage and transmission assets of : Docket No. A-2013-2353649  
Peoples Natural 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 :

---

PREHEARING MEMORANDUM OF  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,  
LOCAL 1956

---

Pursuant to 52 Pa. Code § 5.222(d)(1), International Brotherhood of Electrical Workers, Local 1956 (IBEW) hereby files this Prehearing Memorandum.

1. Party Identification: IBEW is the authorized collective bargaining representative for approximately 31 employees of Equitable Gas Company, LLC (Equitable). IBEW filed a Petition to Intervene in this proceeding on April 15, 2013.

2. Service List: IBEW is represented by the undersigned counsel, upon whom all documents should be served.

3. Method for Serving Documents: Pursuant to 52 Pa. Code § 1.54(b)(3), IBEW consents to the service of documents by electronic mail to counsel's email address, to be followed with a hard copy served on counsel by first class mail.

4. Discovery: IBEW, in conjunction with Utility Workers Union of America, Local 666, has served one set of interrogatories on the Joint Applicants. In addition, IBEW is serving a separate set of discovery requests on Equitable. Responses or objections are not yet due to those interrogatories.

5. Schedule: IBEW will work with the other parties at or before the Prehearing Conference to develop a schedule that meets the needs of all parties.

6. Witnesses: IBEW has not yet determined if it will be filing testimony and, therefore, it has not determined if it will have a witness. If it decides to call a witness, it will immediately provide notice to the parties and the ALJ of the identity of the witness and the anticipated subject matter of the testimony.

7. Issues: IBEW has not yet identified specific issues, if any, that it intends to address on the record in this proceeding. The ultimate issue of concern to IBEW is the impact of the proposed transaction on IBEW and its members, which is an issue that the Commission is required to consider under 66 Pa. C.S. § 2210(a)(2). Through discovery and informal consultation among the parties, IBEW expects to investigate the following issues, among others:

- The effect, if any, of the proposed transaction on the employment, job security, compensation, and benefits of the members of IBEW;
- The effect, if any, of the proposed transaction on the ability of Equitable to continue providing its customers with safe and reliable service;
- The effect, if any, of the proposed transaction on the ability of Equitable to continue providing its employees with a safe working environment that complies with all applicable federal and state requirements; and

- Whether it is in the long-term best interests of Equitable's employees and customers, and the communities where they reside, to have Equitable merge with and into Peoples Natural Gas Company, LLC.

Respectfully submitted,



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](mailto:scott.j.rubin@gmail.com)

Counsel for:

International Brotherhood of Electrical Workers,

Local 1956

Dated: May 3, 2013

---

CERTIFICATE OF SERVICE

---

I hereby certify that I have this day served a true copy of the Prehearing Memorandum of International Brotherhood of Electrical Workers, Local 1956, 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

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

Todd Stewart  
Hawke, McKeon & Sniscak LLP  
P.O. Box 1778  
Harrisburg, PA 17105-1778  
tsstewart@hmslegal.com

Carl J. Zwick  
Hopkins Heltzel LLP  
100 Meadow Lane, Suite 5  
DuBois, PA 15801  
cj@hopkinsheltzel.com

Pamela C. Polacek / Vasiliki Karandrikas  
McNees Wallace & Nurick LLC  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
ppolacek@mwn.com  
vkarandrikas@mwn.com  
etrinkle@mwn.com

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 / Carrie Wright  
Bureau of Investigation & Enforcement  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
akaster@pa.gov / carwright@pa.gov,

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

Thomas J. Sniscak / William E. Lehman  
Hawke, McKeon & Sniscak LLP  
P.O. Box 1778  
Harrisburg, PA 17105-1778  
tjsniscak@hmslegal.com  
welehman@hmslegal.com

Kevin J. Moody, General Counsel  
Pa. Independent Oil & Gas Association  
212 Locust St., Suite 300  
Harrisburg, PA 17101-1510  
kevin@pioga.org

Amanda M. Fisher, Assistant General Counsel  
United Steelworkers Legal Department  
Five Gateway Center, Suite 807  
60 Boulevard of the Allies  
Pittsburgh, PA 15222  
afisher@usw.org

Craig R. Burgraff / Steven K. Haas  
Hawke, McKeon & Sniscak LLP  
P.O. Box 1778  
Harrisburg, PA 17105-1778  
crburgraff@hmslegal.com  
skhaas@hmslegal.com

Derrick Price Williamson / Barry Naum  
Spilman Thomas & Battle, PLLC  
110 Bent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050  
dwilliamson@spilmanlaw.com  
bnaum@spilmanlaw.com

Kevin J. McKeon / Christopher M. Arfaa  
Hawke, McKeon & Sniscak LLP  
P.O. Box 1778  
Harrisburg, PA 17105-1778  
kjmckeon@hmslegal.com  
cmarfaa@hmslegal.com

  
Scott J. Rubin  
Counsel for IBEW Local 1956

Dated: May 3, 2013