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February 25, 2019

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

Re: Pa. Public Utility Commission v. Peoples Natural
Gas Company, LLC, Docket No. R-2018-3006818

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced proceeding please find Petition to Intervene of Utility Workers Union of America, Local 612.

This document is being served on all parties of record, and was filed electronically with the Commission on this date, as shown on the attached Certificate of Service.

Sincerely,



Enclosure

cc: All parties of record

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Petition to Intervene of Utility Workers Union of America, Local 612, upon the following parties by electronic mail (where an email address is shown) and first-class mail.

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2/29/2019
Date



Scott J. Rubin, Counsel for UWUA Local 612

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3006818
	:	
Peoples Natural Gas Company, LLC	:	

PETITION TO INTERVENE
OF UTILITY WORKERS UNION OF AMERICA, LOCAL 612

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, Utility Workers Union of America, Local 612 (“UWUA”), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, UWUA states as follows:

1. UWUA is the authorized bargaining unit for more than 700 employees of Peoples Natural Gas Company, LLC (“Peoples”), most of whom are also customers of Peoples.
2. UWUA’s mailing address is: 555 Pittsburgh Mills Circle, Tarentum, PA 15084.
3. UWUA will be represented in this case by, and all documents should be served upon, its attorney:

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

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

5. On January 28, 2019, Peoples filed a request for a net base rate increase of approximately \$94.9 million.

6. UWUA anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of its members who are Peoples's employees, retirees, and customers. For example, Peoples's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among others. See, for example, the Direct Testimony of Andrew Wachter, Peoples St. 3, pages 8-17. In addition, issues may be raised by various parties concerning the safety or reliability of Peoples's service that will or may have a direct effect on UWUA and its members.

7. No other party to this proceeding represents the interests of UWUA and its members.

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

WHEREFORE, Utility Workers Union of America, Local 612, respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



Scott J. Rubin (PA Atty. Id. 34536)

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Counsel for:

UWUA Local 612

Dated: February 25, 2019

