

STEVENS & LEE
LAWYERS & CONSULTANTS

17 North Second Street
16th Floor
Harrisburg, PA 17101
(717) 234-1090 Fax (717) 234-1099
www.stevenslee.com

Direct Dial: (717) 255-7365
Email: mag@stevenslee.com
Direct Fax: (610) 988-0852

February 25, 2019

VIA ELECTRONIC FILING

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

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

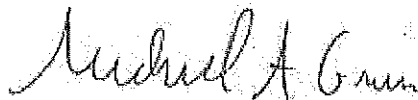
Dear Secretary Chiavetta:

Enclosed for filing is the Petition to Intervene of Duquesne Light Company in the above-captioned matter.

Copies of the Petition have been served in accordance with the attached Certificate of Service. Should you have any questions, please feel free to contact me.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Certificate of Service

**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 DUQUESNE LIGHT COMPANY

Pursuant to 52 Pa. Code §§5.71 – 5.74, Duquesne Light Company (“Duquesne Light”) submits this Petition to Intervene in the above-referenced matter and in support thereof respectfully avers as follows:

1. The Petitioner is Duquesne Light, a public utility and electric distribution company as defined in Sections 102 and 2803 of the Public Utility Code, 66 Pa. C.S.A. §§ 102, 2803.
2. Duquesne Light furnishes electric service to approximately 588,000 customers throughout its certificated service territory, which includes portions of Allegheny and Beaver Counties and encompasses approximately 817 square miles.
3. Duquesne Light is a customer of Peoples Natural Gas Company, LLC (“Peoples”) and receives natural gas services from Peoples at the following locations:

Site	Address
Woods Run Building 5	2833 New Beaver Ave, Pittsburgh 15233
Woods Run Building 6	2825 New Beaver Ave, Pittsburgh 15233
Preble Service Center	2645 New Beaver Ave, Pittsburgh 15233
New Manchester	2515 Preble Ave, Pittsburgh 15233
Seymour Street	1800 Seymour St, Pittsburgh 15233

4. Duquesne Light is represented in this matter by the following counsel:

Emily M. Farah (PA ID No. 322559)
Tishekia Williams (PA ID No. 208997)
Michael Zimmerman (PA ID No. 323715)
Duquesne Light Company
411 7th Avenue, 15th Fl.
Pittsburgh, PA 15219
Phone: (412) 393-6431
email: efarah@duqlight.com
twilliams@duqlight.com
tzimmerman@duqlight.com

Linda R. Evers (PA ID No. 81428)
Donald R. Wagner (PA ID No. 80280)
Michael A. Gruin (PA ID No. 78625)
Stevens & Lee
111 N. Sixth Street
Reading, PA 19601
Phone: (610) 478-2265
Fax: (610) 988-0855
email: lre@stevenslee.com
drw@stevenslee.com
mag@stevenslee.com

Duquesne Light requests that the Commission and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders and any documents issued in this proceeding on counsel for Duquesne Light at the above addresses.

5. On January 28, 2019, Peoples filed a Base Rate Case Filing with the Pennsylvania Public Utility Commission (“Commission”) seeking a base rate increase of \$94.9 million resulting in, *inter alia*, a 14.4% increase to commercial customers.

6. The Commission’s regulations at 52 Pa. Code § 5.72(a) provide that “A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that

intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

- a. A right conferred by statute of the United States or of the Commonwealth.
- b. An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.
- c. Another interest of such nature that participation of the petitioner may be in the public interest.

7. Duquesne Light clearly meets the standard for intervention, as set forth below.

8. Duquesne Light seeks to intervene in this proceeding to address issues related to, *inter alia*:

(a) How the proposed rate increase will impact Peoples' distribution rates, reliability, customer service, and quality of service for its customers, including Duquesne Light.

(b) Any tariff changes proposed or appropriate in connection with the base rate filing.

9. Duquesne Light may identify other issues that may arise as the proceeding develops, and reserves the right to address such issues as they arise.

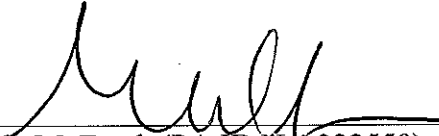
10. The interests of Duquesne Light are not represented by any other participant in this proceeding, the outcome of which will be binding upon Duquesne Light.

11. As a Peoples customer, Duquesne Light has a direct and substantial interest in this proceeding, and Duquesne Light's participation is in the public interest.

12. Because no other entity can represent Duquesne Light's interests, Duquesne Light requests that it be permitted to intervene as a party in order to adequately represent and protect its interests in this proceeding.

WHEREFORE, Duquesne Light Company respectfully requests that its Petition to Intervene be granted and that it be accorded full party status in the above-captioned proceeding.

Respectfully submitted,



Emily M. Farah (PA ID No. 322559)
Tishekia Williams (PA ID No. 208997)
Michael Zimmerman (PA ID No. 323715)
Duquesne Light Company
411 7th Avenue, 15th Fl.
Pittsburgh, PA 15219
Phone: (412) 393-6431
email: efarah@duqlight.com
twilliams@duqlight.com
mzimmerman@duqlight.com

Linda R. Evers (PA ID No. 81428)
Donald R. Wagner (PA ID No. 80280)
Michael A. Gruin (PA ID No. 78625)
Stevens & Lee
111 N. Sixth Street
Reading, PA 19601
Phone: (610) 478-2265
Fax: (610) 988-0855
email: lre@stevenslee.com
drw@stevenslee.com
mag@stevenslee.com

February 25, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

Peoples Natural Gas Company, LLC

Docket No. R-2018-3006818

VERIFICATION

I, Christopher G. Kefalos, being a Real Estate Specialist with Duquesne Light Company, hereby state that the facts set forth in the foregoing Petition to Intervene of Duquesne Light Company 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 if 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:

02/22/2019



Christopher G. Kefalos

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :

v. :

Peoples Natural Gas Company, LLC :

Docket No. R-2018-3006818

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2019, copies of the foregoing Petition to Intervene have been served upon the persons listed below via Electronic Mail and First Class U.S. Mail in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Michael W. Hassell, Esq.
 Michael W. Gang, Esq.
 Devin Ryan Esq.
 Post & Schell
 17 N. 2nd St., 12th Floor
 Harrisburg, PA 17101
(Counsel for Peoples)

Erin K. Fure, Esq.
 Office of Small Business Advocate
 300 North Second Street, Suite 202
 Harrisburg, PA 17101
(Counsel for OSBA)

William H. Roberts II, Esq.
 Peoples Natural Gas Company LLC
 375 North Shore Drive
 Pittsburgh, PA 15212
(Counsel for Peoples)

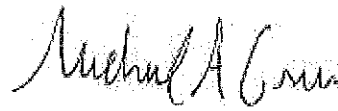
Joseph L. Vullo, Esq.
 Burke, Vullo Reilly Roberts
 1460 Wyoming Ave.
 Forty Fort, PA 18704
(Counsel for Community Action Association of Pennsylvania)

Christy M. Appleby
 Office of Consumer Advocate
 555 Walnut Street 5th Floor
 Forum Place
 Harrisburg PA 17101
(Counsel for OCA)

Todd S. Stewart, Esq.
 Hawke, McKeon & Sniscak, LLP
 10 North Tenth St.
 Harrisburg, PA 17101
(Counsel for RESA)

Erika L. McLain, Esq.
Carrie B. Wright, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street
Harrisburg, PA 17120
(*Counsel for BIE*)

Patrick Cicero, Esq.
Elizabeth R. Marx, Esq.
John Sweet, Esq.
Kadeem Morris, Esq.
The Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
(*Counsel for CAUSE-PA*)



DATE: February 25, 2019

Michael A. Gruin