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March 11, 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 the Prehearing Memorandum 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.

Sincerely Redoin

Enclosure

cc: Joel H. Cheskis, Deputy Chief Administrative Law Judge All parties of record

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v.

Docket No. R-2018-3006818

Peoples Natural Gas Company, LLC

PRÉHEARING MEMORANDUM OF UTILITY WORKERS UNION OF AMERICA, LOCAL 612

In accordance with the Administrative Law Judge's Prehearing Conference Order dated March 4, 2019, and 52 Pa. Code § 5.222(d)(1), Utility Workers Union of America, Local 612 ("UWUA"), hereby files this Prehearing Memorandum and provides the following information to the Administrative Law Judge and the active parties to this proceeding.

Procedural History: UWUA filed a Petition to Intervene on February 25, 2019.

Issues: UWUA has been reviewing the exhibits and testimony filed by Peoples Natural Gas Company, LLC ("Peoples"). At this stage, UWUA has not identified any specific issues on which it would file direct testimony. UWUA will focus its attention on issues that could have a direct and substantial impact on its members. This will include, but not be limited to, employee-related issues (such as employment levels, productivity, benefit costs, and the status of Peoples's pension fund), as well as issues related to the safety and reliability of service. UWUA has not determined the extent to which it will need to participate in order to represent the interests of its members, but it will pursue these issues, as necessary, through discovery, cross-examination, direct and rebuttal testimony, and the filing of briefs and other pleadings, as required to protect its interests.

<u>Witnesses:</u> UWUA has not identified the need for, or identity of, any witnesses at this time. If it is determined that a witness is necessary, UWUA will notify the Administrative Law Judge and parties as soon as that person is identified.

Service List: UWUA requests that its entry on the service list should be for its counsel, as follows:

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

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

<u>Schedule:</u> Counsel for UWUA has been working with counsel for other parties to develop a schedule for this proceeding, and it does not object to the schedule that will be proposed by Peoples and the public advocates.

Respectfully submitted,

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

Counsel for UWUA Local 612

Dated: March 11, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Prehearing Memorandum 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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<u>March 11, 2019</u> Date

Scott J. Rubin, Counsel for UWUA Local 612