

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

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,



Enclosure

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

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.

Witnesses: 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.

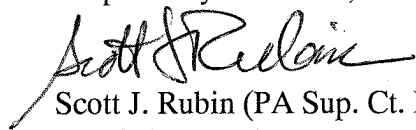
Service List: UWUA requests that its entry on the service list should be for its counsel, as follows:

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.

Schedule: 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.

Michael Gang / Anthony Kanagy / Devin Ryan
Post & Schell
17 N. Second St., 12th floor
Harrisburg, PA 17101-1601
mgang@postschell.com,
akanagy@postschell.com, dryan@postschell.com, ksitler@postschell.com,
jlangan@postschell.com, Andrew.Wachter@peoples-gas.com
Representing Peoples Natural Gas Company, LLC

Christy Appleby / Harrison Breitman
Office of Consumer Advocate
555 Walnut St., 5th Floor
Harrisburg, PA 17101
cappleby@paoca.org, hbreitman@paoca.org
Representing Office of Consumer Advocate

Carrie Wright / Erika McLain
Bureau of Investigation & Enforcement
Pa. Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265
carwright@pa.gov, ermclain@pa.gov
Representing Bureau of Investigation & Enforcement

Erin K. Fure
Office of Small Business Advocate
300 North Second St, Suite 202
Harrisburg, PA 17101
efure@pa.gov
Representing Office of Small Business Advocate

Patrick Cicero
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pciceropulp@palegalaid.net, pulp@palegalaid.net
Representing CAUSE-PA

Todd S. Stewart
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
Representing Natural Gas Supplier Parties and The Retail Energy Supply Association

Joseph L. Vullo
Burke Vullo Reilly Roberts
1460 Wyoming Ave.
Forty Fort, PA 18704
jvullo@aol.com
Representing Community Action Association of PA

Charles F. Hagins
420 Goucher St.
Johnstown, PA 15905
Representing Self

Samuel Givens
132 Thunderbird Dr.
McKeesport, PA 15135-2138
Representing Self

Daniel Killmeyer
184 McKay Road
Saxonburg, PA 16056-0726
Representing Self

Sean Ferris
406 Laurie Dr.
Penn Hills, PA 15235
Representing Self

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

Emily Farah / Tisheikia Williams / Michael Zimmerman
Duquesne Light Co.
411 Seventh Ave.
Pittsburgh, PA 15219
efarah@duqlight.com, twilliams@duqlight.com, tzimmerman@duqlight.com
Representing Duquesne Light Co.

Linda Evers / Donald Wagner / Michael Gruin
Stevens & Lee
111 N. Sixth St.
Reading, PA 19601
ire@stevenslee.com, drw@stevenslee.com, mag@stevenslee.com
Representing Duquesne Light Co.

Pamela C. Polacek
Vasiliki Karandrikas
Errin T. McCaulley, Jr.
McNees Wallace & Nurick LLC
P.O. Box 1166
Harrisburg, PA 17108
ppolacek@mcneeslaw.com, vkarandrikas@mcneeslaw.com,
emccaulley@mcneeslaw.com
Representing Snyder Brothers, Inc., et al.

Tanya Leshko / Alan Seltzer
Buchanan Ingersoll & Rooney PC
409 North Second St., Suite 500
Harrisburg, PA 17101-1357
alan.seltzer@bipc.com, tanya.leshko@bipc.com
Representing Equitrans, LP

March 11, 2019
Date



Scott J. Rubin, Counsel for UWUA Local 612