

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

September 22, 2010

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

Re: Pa. P.U.C. v. Duquesne Light Company
Docket No. R-2010-2179522

Dear Secretary Chiavetta:

Enclosed for filing please find the **Prehearing Memorandum of International Brotherhood of Electrical Workers, Local 29**, in the above-referenced proceeding.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Scott J. Rubin". The signature is fluid and cursive, with the first name "Scott" and last name "Rubin" clearly legible.

Enclosure

cc: Mary A. Hoyer, ALJ
Conrad A. Johnson, ALJ
per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2010-2179522
 :
 Duquesne Light Company :

PREHEARING MEMORANDUM
OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 29

In accordance with the Administrative Law Judges' Prehearing Conference Order and 52 Pa. Code § 5.222(d)(1), International Brotherhood of Electrical Workers, Local 29 ("IBEW"), hereby files this Prehearing Memorandum and provides the following information to the Administrative Law Judges and the active parties to this proceeding.

Procedural History: IBEW filed a Petition to Intervene on August 3, 2010. No party has objected to IBEW's intervention.

Issues: IBEW has been reviewing the filing, discovery responses, and testimony filed by Duquesne Light Company ("Duquesne"), and has conducted its own discovery. At this stage, IBEW has not identified any specific issues on which it would file direct testimony. IBEW 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 Duquesne's pension fund), as well as issues related to the safety and reliability of service. IBEW 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 cross-examination, direct or rebuttal testimony, and the filing of briefs and other pleadings, as required to protect its interests.

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


Service List: IBEW 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 / Fax: (570) 387-1894
Email: scott.j.rubin@gmail.com

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

Schedule: Counsel for IBEW has been working with counsel for other parties to develop a schedule for this proceeding. It is anticipated that a consensus schedule will be provided to the Administrative Law Judges at or before the prehearing conference.

Respectfully submitted,


Scott J. Rubin (PA Sup. Ct. ID 34536)
333 Oak Lane
Bloomsburg, PA 17815-2036
Voice: (570) 387-1893
Fax: (570) 387-1894
Email: scott.j.rubin@gmail.com

Counsel for IBEW Local 29

Dated: September 22, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing upon the following parties to this proceeding by electronic mail and first class mail.

David B. MacGregor
Post & Schell PC
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Gary A. Jack
Duquesne Light Co.
411 Seventh Ave
Pittsburgh, PA 15219
gjack@duqlight.com

Charles Shields / Adeolu Bakare
Office of Trial Staff
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
chshields@state.pa.us
abakare@state.pa.us

Pamela Polacek
McNees Wallace & Nurick
P.O. Box 1166
Harrisburg, PA 17101-1166
ppolacek@mwn.com


Mary Chestnut
400 Center Manor Drive, Lot C-13
Monaca, PA 15016

Michael Gang / Anthony Kanagy
Post & Schell PC
17 North Second St., 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com

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

Tanya McCloskey / Candis Tunilo / David Evrard
Office of Consumer Advocate
555 Walnut St., 5th Floor
Harrisburg, PA 17101-1923
tmccloskey@paoca.org
ctunilo@paoca.org
devrard@paoca.org

Janet Vento
711 Southern Ave.
Pittsburgh, PA 15235



Scott J. Rubin

Dated: September 22, 2010