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April 15, 2013

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

Re: Joint application of Peoples Natural Gas Company,  
LLC, Peoples TWP, LLC and Equitable Gas  
Company, LLC for all of the authority and the  
necessary certificates of public convenience  
Docket Nos. A-2013-2353647, A-2013-2353649,  
and A-2013-2353651

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of  
Electrical Workers, Local 1956, in the above-referenced proceeding.

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

Sincerely,

A handwritten signature in black ink that reads "Scott J. Rubin". The signature is written in a cursive, flowing style.

Enclosure

cc: All parties per Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint application of Peoples Natural Gas Company, :  
LLC, Peoples TWP, LLC and Equitable Gas :  
Company, LLC for all of the authority and the :  
necessary certificates of public convenience: 1) to :  
transfer all of the issued and outstanding limited :  
liability company membership interest of Equitable :  
Gas Company, LLC to PNG Companies, LLC; 2) to :  
merge Equitable Gas Company, LLC with Peoples :  
Natural Gas Company, LLC; 3) to transfer certain : Docket No. A-2013-2353647  
storage and transmission assets of Peoples Natural : Docket No. A-2013-2353649  
Gas Company, LLC to affiliates of EQT : Docket No. A-2013-2353651  
Corporation; 4) to transfer certain assets between :  
Equitable Gas Company, LLC and affiliates of EQT :  
Corporation; 5) for approval of certain ownership :  
changes associated with the transaction; 6) for :  
approval of certain associated gas capacity and :  
supply agreements; and 7) for approval of certain :  
changes in the tariff of Peoples Natural Gas :  
Company, LLC :

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PETITION TO INTERVENE OF  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,  
LOCAL 1956

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Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, the International Brotherhood of Electrical Workers, Local 1956 (“IBEW”), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, IBEW states as follows:

1. IBEW is the authorized collective bargaining representative for approximately 31 employees of Equitable Gas Company, LLC (“Equitable”), some of whom are also believed to be customers of Equitable.
2. IBEW’s mailing address is: 401 Wood Street, Suite 402, Pittsburgh, PA 15222.
3. IBEW will be represented by, and all documents should be served upon, its counsel:

Scott J. Rubin (PA Supreme Court Id. 34536)  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
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4. Counsel already appears on the service list for this case as the representative of Utility Workers Union of America, Local 666.

5. This proceeding concerns the proposed merger of Equitable, with and into Peoples Natural Gas Company, LLC (“Peoples”), as well as related transactions, as set forth in the Application.

6. IBEW desires to participate in this proceeding to ensure that its interests and the interests of its members, as employees and/or customers of Equitable, are fully protected and represented in this matter. IBEW anticipates issues being raised in this proceeding that will or may affect its interests as a representatives of its members’ interests, including but not limited to the impact of the proposed transaction on Equitable’s employees.

7. The Application raises several issues that will affect the members of IBEW, including, but not limited to, proposals to (a) consolidate the field operations and offices of Peoples and Equitable, (b) consolidate leak detection and One-Call processes, (c) reduce capital spending and maintenance in areas where both utilities have distribution facilities, (d) consolidate various back-office functions, and (e) have employees of one utility perform work on the other utility’s facilities.

8. The Commission is required to consider the “effect of the proposed merger ... on the employees of the natural gas distribution company and on any authorized collective bargaining agent representing those employees.” 66 Pa. C.S. § 2210(a)(2).

9. No other party represents the interests of IBEW in this proceeding or can speak for IBEW as to the effects of the proposed transaction on IBEW and its members.

10. IBEW intends to actively participate in this proceeding on such matters that affect its interests. Such participation may include conducting discovery, presenting testimony, cross-examining witnesses, and filing briefs and other pleadings.

11. IBEW acknowledges that a labor union, Utility Workers Union of America, Local 666 (“UWUA”), representing employees of Peoples has filed a Petition to Intervene in this proceeding. IBEW and UWUA are using the same counsel and will coordinate their efforts in this proceeding to the extent possible.

WHEREFORE, International Brotherhood of Electrical Workers, Local 1956, respectfully requests the right to intervene in this proceeding.

Respectfully submitted,



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Counsel for:

International Brotherhood of Electrical Workers,  
Local 1956

Dated: April 15, 2013

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VERIFICATION

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I, Michael Maloney, the Vice-President of International Brotherhood of Electrical Workers, Local 1956, hereby state that the facts above set forth 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 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: APRIL 12, 2013

Michael Maloney

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CERTIFICATE OF SERVICE

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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.

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Scott J. Rubin  
Counsel for UWUA Local 666

Dated: April 15, 2013