

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

August 14, 2013

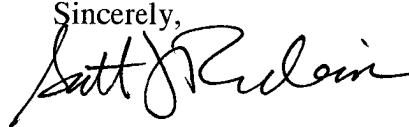
Rosemary Chiavetta, Secretary  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg PA 17105-3265

Re: Pa. PUC v. Duquesne Light Co.  
Docket No. R-2013-2372129

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene 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,  


Enclosure

cc: All parties per Certificate of Service



4. On August 2, 2013, Duquesne filed a request for a base rate increase of approximately \$76.3 million.

5. IBEW anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of Duquesne's employees and retirees and as a customer of Duquesne. For example, Duquesne's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among others. In addition, issues may be raised by various parties concerning the safety or reliability of Duquesne's service that will or may have a direct effect on IBEW and its members.

6. No other party to this proceeding represents the interests of IBEW and its members.

7. IBEW intends to actively participate in this proceeding on such matters that affect its interests as a customer of Duquesne and the interests of its members as employees and retirees of Duquesne. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by Duquesne and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers, Local 29 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



Scott J. Rubin (PA Atty. 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:

International Brotherhood of Electrical Workers,  
Local 29

Dated: August 14, 2013

---

VERIFICATION

---

I, Jeffrey R. Davis, the Business Manager of International Brotherhood of Electrical Workers, Local 29, 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:

8/13/2013

Jeffrey R. Davis

---

CERTIFICATE OF SERVICE

---

I hereby certify that I have this day served a true copy of Petition to Intervene of International Brotherhood of Electrical Workers, Local 29, upon the following parties by electronic mail (where an email address is shown) and first class mail.


Robert H. Hoaglund II / Tishekia E. Williams  
Duquesne Light Company  
411 Seventh Avenue, 16<sup>th</sup> Fl.  
Pittsburgh, PA 15219  
rhoaglund@duqlight.com  
twilliams@duqlight.com

Charles Daniel Shields  
Bureau of Investigation & Enforcement  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
chshields@pa.gov

John R. Evans  
Office of Small Business Advocate  
300 North Second St., Suite 1102  
Harrisburg, PA 17101

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

Tanya J. McCloskey  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

  
\_\_\_\_\_  
Scott J. Rubin  
Counsel for IBEW Local 29

Dated: August 14, 2013