



SPILMAN THOMAS & BATTLE, PLLC

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September 6, 2013

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. Duquesne Light Company  
Docket No. R-2013-2372129**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the United States Steel Corporation ("U. S. Steel") in the above-referenced proceeding.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By

Derrick Price Williamson  
Barry A. Naum

BAN/lhi

Enclosures

c: Office of Administrative Law Judge (via First Class Mail)  
Certificate of Service



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2013-2372129
	:	
Duquesne Light Company	:	

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**PETITION TO INTERVENE  
OF UNITED STATES STEEL CORPORATION**

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TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, United States Steel Corporation ("U. S. Steel" or "Petitioner") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, U. S. Steel states as follows:

1. Petitioner is U. S. Steel.
2. The name and address of Petitioner's attorneys are:

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Counsel to U. S. Steel consents to service of documents by electronic mail at the e-mail addresses above.

3. On August 2, 2013, Duquesne Light Company ("Duquesne" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Supplement No. 81

to the Company's Tariff Electric – Pa. P.U.C. No. 24 (the "Filing"), representing a request for a general increase in the Company's electric distribution rates of approximately \$76.3 million, to be effective October 1, 2013. DLC Exhibit 2, "Statement of Reason," p. 1. If approved, the Company's request would amount to a system average increase of approximately 17.6% above current distribution rates. Id. As primary justification for this proposed rate increase, Duquesne reports "significant cost increases" in providing electric distribution service related to: (1) "increased investment in facilities to maintain high levels of service and reliability;" (2) "increased investment in information technology;" (3) "increased operation and maintenance expenses to maintain safe and reliable service, including increased vegetation management expenses;" and (4) "increased costs for [the] Company's cyber security initiatives to maintain the integrity of the Company's and customers' information." Id. The Company also reports an increase in its net plant of "approximately \$266 million as of the end of the future test year in the 2010 base rate case through April 30, 2015." Id.

4. U. S. Steel, headquartered in Pittsburgh, Pennsylvania, is an integrated steel producer with major production operations in the United States, Canada, and Central Europe, and an annual raw steelmaking capability of 29.3 million net tons. U. S. Steel manufactures a wide range of value-added steel sheet and tubular products for the automotive, appliance, container, industrial machinery, construction, and oil and gas industries, and employs over 5,400 full-time employees at its numerous facilities in and throughout Pennsylvania, with significant operations located within Duquesne's service territory, including its Mon Valley Works, Research and Technology Center, Business Service Center, and McKeesport Tubular Operations in Allegheny County. Controlling the costs associated with the production of steel, including the considerable energy costs related to its operations, is of critical importance to U. S. Steel.

5. In that regard, U. S. Steel annually consumes many millions of kWh delivered by Duquesne, making U. S. Steel one of the largest customers on the Company's system. Specifically, U. S. Steel currently takes electric distribution service from Duquesne under a number of accounts, including primarily the Company's Rate Schedules HVPS, GL, and L. Accordingly, the cost, reliability, and quality of the electric distribution service provided by Duquesne are issues of significant concern to U. S. Steel. Based on an initial review of Duquesne's Filing, U. S. Steel is concerned that it may have, since the Company's last distribution rate case, been paying significantly more for distribution service under current rates than was warranted. U. S. Steel is also evaluating Duquesne's proposed rate increases and rate design changes for Rate Schedules GL and L.

6. Therefore, the resolution of Duquesne's proposed rate increase, including any changes to the Company's current tariff that other parties might propose, could have a direct impact on U. S. Steel's interests, which are not adequately represented by existing participants in the case. Given the substantial economic and employment benefit that U. S. Steel provides in the Duquesne service territory and the surrounding region of Pennsylvania, U. S. Steel's interests are of such a nature that its participation in this case is in the public interest. See 52 Pa. Code § 5.72(a)(2) & (3).

**WHEREFORE**, United States Steel Corporation respectfully requests that the Commission grant this Petition to Intervene and provide United States Steel Corporation with full party status in this proceeding.

Respectfully submitted,

By 

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Counsel to United States Steel Corporation

Dated: September 6, 2013

**VERIFICATION**

I, Barry A. Naum, Counsel to United States Steel Corporation, hereby state that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: September 6, 2013



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Barry A. Naum