

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 30, 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 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,



Enclosure

cc: Conrad A. Johnson, Administrative Law Judge
All parties per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

PREHEARING MEMORANDUM
OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 29

In accordance with the Administrative Law Judge’s Prehearing Conference Order dated September 26, 2013, 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 Judge and the active parties to this proceeding.

Procedural History: IBEW filed a Petition to Intervene on August 14, 2013. 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”). 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 discovery, 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 Judge 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 hoped that a consensus schedule will be provided to the Administrative Law Judge 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 30, 2013

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, 16th 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

Sharon E. Webb
Office of Small Business Advocate
300 North Second St., Suite 1102
Harrisburg, PA 17101
swebb@pa.gov

Theodore S. Robinson
Citizen Power
2121 Murray Ave.
Pittsburgh, PA 15217
robinson@citizenpower.com

Harry S. Geller / Patrick M. Cicero
Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@palegalaid.net

Todd S. Stewart
Hawke McKeon & Sniscak LLP
P.O. Box 1778
Harrisburg, P A 17105-1778
tsstewart@hmslegal.com

Gwendolyn L. Levert
431 Kenmawr Avenue, Apt. 1
Rankin, PA 15104

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

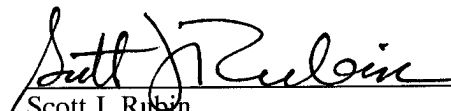
Candis Tunilo / David Evrard / Amy Hirakis
Office of Consumer Advocate
555 Walnut St., 5th Floor, Forum Place
Harrisburg, PA 17101-1923
ctunilo@paoca.org / devrard@paoca.org /
ahirakis@paoca.org

Derrick Price Williamson / Barry A. Naum
Spilman Thomas & Battle PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum @spilmanlaw.com

Joseph L. Vullo
Burke Vullo Reilly Roberts
1460 Wyoming Ave.
Forty Fort, PA 18704
jlvullo@aol.com

Pamela C. Polacek / Teresa K. Schmittberger
McNees Wallace & Nurick LLC
P.O. Box 1166
Harrisburg, PA 17108-1166
ppolacek@mwn.com
tschmittberger@mwn.com

Jacquelyn & Robert Miller
3011 May Street Ext
Pittsburgh, PA 15234


Scott J. Rubin
Counsel for IBEW Local 29

Dated: September 30, 2013