

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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February 12, 2016

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: International Brotherhood of Electrical Workers,
Local 614
v.
PECO Energy Company
Docket No. C-2016-2525801

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Darryl Lawrence
Darryl Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682

Attachment

cc: Office of Administrative Law Judge
Certificate of Service

217106

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

International Brotherhood of Electrical Workers, :
Local 614 : Docket No. C-2016-2525801
v. :
PECO Energy Company :

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above captioned proceeding should be addressed to the following:

Darryl Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

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Harrisburg, PA 17101-1923
Phone: (717) 783-5048
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Respectfully submitted,



Darryl Lawrence
Senior Assistant Consumer Advocate

DATED: February 12, 2016

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Intervention to participate in proceedings before the Commission involving the Complaint of the International Brotherhood of Electrical Workers, Local 614 (IBEW) against PECO Energy Company (PECO).

On January 25, 2016, the IBEW filed a complaint with the Commission requesting the Commission to enforce PECO's compliance with its Commission-approved Long-Term Infrastructure Improvement Plan (LTIIIP). IBEW avers that PECO's failure to comply with the LTIIIP is having a "direct and immediate adverse effect on the safety of local 614's members who are field employees of PECO and who are being subjected to hazardous conditions on the job." IBEW avers that PECO's use of unqualified Contractors of Choice (COC) and PECO's failure to sufficiently supervise the COC, does not provide "adequate, efficient, safe, and reasonable service and facilities" as required by Section 1501 of the Public Utility Code. 66 Pa. C.S. § 1501. IBEW is requesting the Commission to enforce the provisions of PECO's LTIIIP and require the use of qualified utility employees or contractors to inspect all work performed by contractors. In addition, IBEW is requesting the termination of PECO's Distribution Service Improvement Charge should PECO fail to comply with the LTIIIP requirements.

The Acting Consumer Advocate determined to intervene in this matter to protect the interests of PECO's customers under the applicable sections of the Public Utility Code and Commission regulations.

CERTIFICATE OF SERVICE

International Brotherhood of Electrical Workers :
Local 614 : Docket No. C-2016-2525801
v. :
PECO Energy Company :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 12th day of February 2016.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Johnnie Simms
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

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/s/ Darryl Lawrence

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