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May 3, 2024

Via Email this date to

Administrative Law Judges

Marta Guhl and Darlene Heep

Pennsylvania Public Utility Commission

Office of Administrative Law Judge

801 Market Street, Suite 4063

Philadelphia, PA 19107

dheep@pa.gov

mguhl@pa.gov

**RE: Pennsylvania Public Utility Commission v. PECO Energy Company- Gas
Division**

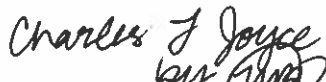
Docket No. R-2024-3046932

Internal File No. 1974-004

Your Honor:

Please find the attached Prehearing Memorandum of Intervenor IBEW Local 614 in the above-noted proceeding.

Sincerely,


Charles T. Joyce, Esq.


Nicholas J. Enoch 

Counsel to Intervenor IBEW Local 614

NJE:cgs

cc: Secretary Rosemary Chiavetta (Via efile)
Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

Docket No. R-2024-3046932

v.

PECO ENERGY COMPANY-GAS
DIVISION

**PREHEARING MEMORANDUM OF LOCAL 614 OF THE INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO**

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Counsel for Intervenor IBEW Local 614

Dated: May 3, 2024.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

Docket No. R-2024-3046932

v.

PECO ENERGY COMPANY-GAS
DIVISION

**PREHEARING MEMORANDUM OF LOCAL 614 OF THE INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO**

On April 29, 2024, a Prehearing Conference Order was issued by the Honorable Darlene Heep and Marta Guhl, Administrative Law Judge (ALJ), setting a telephonic prehearing conference for Tuesday, May 7, 2024, at 1:30 p.m., and requiring parties to file a Prehearing Memorandum. In response, Local Union 614 of the International Brotherhood of Electrical Workers, AFL-CIO (“IBEW Local 614”), by and through undersigned counsel, hereby files this Prehearing Memorandum.

I. Background

On March 28, 2024, PECO filed with the PUC its Tariff Gas - Pa. P.U.C. No. 6 (“Filing”), representing a request for a general increase in its natural gas distribution rates. Various oppositions have been filed.

On April 17, 2024, IBEW Local 614 filed a Notice of Intervention in the above-captioned proceeding, in which IBEW Local 614 respectfully requests that the Commission enter an order granting IBEW Local 614 full status as an intervenor in this proceeding with active party status.

II. Issues to be Presented

IBEW Local 614 has reviewed PECO's proposed tariff changes and testimony and identified the following issues it seeks to address in this proceeding:

1. Pension and OPEB expenses
2. Rate Case Expense
3. Vegetation Management
4. Major Storm Expenses, Storm Reserve Account
5. Payroll, Benefits, and Taxes
6. Customer Service Issues and Care Centers
7. Exelon Business Services Company's Cost Allocation Methodology
8. Overall Rate of Return
9. Gas Safety, including Gas Mapping Program and DIMP Threat Rankings
10. Manufactured Gas Plant Remediation Program
11. Worker Safety/Contractor Safety
12. Physical and Cybersecurity Programs
13. Workforce Development Initiatives
14. Lobbying Activities and Expenses

IBEW Local 777 reserves the right to identify additional issues as may arise during the course of the proceeding.

III. Witnesses and Testimony

IBEW Local 614 intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to Your Honor and the parties:

James Glenn
IBEW Local 614
4613 West Chester Pike, Upper Level,
Newtown Square, PA 19073
jamesglenn@614ibew.com

Mr. Glenn will address the issues identified above, as well as other issues that may arise during this proceeding.

IV. Discovery

IBEW Local 614 does not propose any modifications to the discovery rules at this time. *See* 52 Pa. Code §§ 5.321 et seq.

VI. Settlement

IBEW Local 614 is willing to participate in good faith in any and all settlement discussions, whether to resolve this proceeding in whole or in part.

VII. Service on IBEW Local 614

IBEW Local 614 is represented by the following attorneys and should be served as follows:

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IBEW Local 614 requests that the parties agree to electronic service in this proceeding.

VIII. Representation of IBEW Local 614 at Prehearing Conference

At the Prehearing Conference, IBEW Local 614's attorney Nicholas J. Enoch, Esq. will be present and available to provide feedback if requested. Mr. Enoch's *pro hac vice* application should be filed by the end of next week.

WHEREFORE, IBEW Local 614 respectfully submits this Prehearing Memorandum.

RESPECTFULLY SUBMITTED this 3rd day of May, 2024.

SPEAR WILDERMAN, P.C.
LUBIN & ENOCH, P.C.

By: /s/ Charles T. Joyce, Esq.

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Counsel to Intervenor IBEW Local 614

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding, via email, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

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/s/ Morgan L. Bigelow