

LUBIN & ENOCH, P.C.

PHOENIX | DENVER | EL PASO | SANTA FE | BEND

349 North Fourth Avenue
Phoenix, Arizona 85003
(602) 234-0008
Fax: (602) 626-3586

Stanley Lubin (1941-2022)

Nicholas J. Enoch
Also admitted in Colorado & Texas

Clara S. Bustamante
Also admitted in New Mexico & Texas

Morgan L. Bigelow
Also admitted in New Mexico

Margot Veranes
Also admitted in New Mexico & Texas

Taylor M. Secemski

Nicholas P. Granath *of Counsel*
Admitted in Oregon only

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- Electric
Division
Docket No. R-2024-3046931
Internal File No. 1974-005**

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-2024-3046931

v.

PECO ENERGY COMPANY-ELECTRIC
DIVISION

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

Charles T. Joyce, Esq.
Attorney ID: 51254
Spear Wilderman, P.C.
230 South Broad Street, Suite 1650
Philadelphia, PA 19102
Phone: 215-732-0101
CTJoyce@spearwilderman.com

Nicholas J. Enoch, *pro hac vice application forthcoming*
LUBIN & ENOCH, P.C.
349 North 4th Avenue
Phoenix, Arizona 85003-1505
Phone: (602) 234-0008
Fax: (602) 626-3586
nick@lubinandenoch.com

Counsel for Intervenor IBEW Local 614

Dated: May 3, 2024.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Docket No. R-2024-3046931

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**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 Electric - Pa. P.U.C. No. 6 (“Filing”), representing a request for a general increase in its electric 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. EV Charging Pilots, EV Programs, and EV Infrastructure Upgrades
6. Payroll, Benefits, and Taxes
7. Customer Service Issues and Care Centers
8. Exelon Business Services Company's Cost Allocation Methodology
9. Overall Rate of Return
10. Electric Safety
11. Worker Safety/Contractor Safety
12. Physical and Cybersecurity Programs
13. Workforce Development Initiatives
14. Lobbying Activities and Expenses

IBEW Local 614 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:

Charles T. Joyce, Esq.
Attorney ID: 51254
Spear Wilderman, P.C.
230 South Broad Street, Suite 1650
Philadelphia, PA 19102
Phone: 215-732-0101
CTJoyce@spearwilderman.com

Nicholas J. Enoch, *pro hac vice application forthcoming*
LUBIN & ENOCH, P.C.
349 North 4th Avenue
Phoenix, Arizona 85003-1505
Phone: (602) 234-0008
Fax: (602) 626-3586
nick@lubinandenoach.com

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.

IX. Litigation Schedule

At the time of this filing, the parties are in discussions to reach a mutually agreeable litigation schedule.

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.

Charles T. Joyce, Esq.
Attorney ID: 51254
Spear Wilderman, P.C.
230 South Broad Street, Suite 1650
Philadelphia, PA 19102
Phone: 215-732-0101
CTJoyce@spearwilderman.com

Nicholas J. Enoch (Arizona State Bar No. 16473)
Pro hac vice application forthcoming
349 North 4th Avenue
Phoenix, Arizona 85003-1505
Phone: (602) 234-0008
Fax: (602) 626-3586
nick@lubinandenoch.com
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).

RICHARD G WEBSTER
PECO ENERGY COMPANY
2301 MARKET STREET S15
PHILADELPHIA PA 19103
215.841.5777
215.847.6208
dick.webster@exeloncorp.com
Served via email and first class mail

CARRIE B WRIGHT ESQUIRE
BUREAU OF INVESTIGATION AND ENFORCEMENT
SECOND FLOOR WEST
400 NORTH STREET
HARRISBURG PA 17120
717.783.6156
717.787.4887
carwright@pa.gov
Accepts eService

PATRICK M CICERO ESQUIRE
BARRETT SHERIDAN ESQUIRE
ERIN L GANNON ESQUIRE
GINA L MILLER ESQUIRE
JACOB GUTHRIE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET 5TH FLOOR FORUM PLACE
HARRISBURG PA 17101
717.783.5048
bsheridan@paoca.org
egannon@paoca.org

[gmiller@paoca.org](mailto:gmill@paoca.org)
jguthrie@paoca.org
pcicero@paoca.org
Accepts eService

NICHOLAS J ENOCH ESQUIRE
LUBIN & ENOCH PC
349 NORTH FOURTH AVENUE
PHOENIX, AZ 85003
602.234.0008
nick@lubinandenoch.com
Accepts eService
(Counsel for IBEW Local 614)

CHARLES T JOYCE ESQUIRE
SAMUEL SHOPP ESQUIRE*
SPEAR WILDERMAN PC
230 S. BROAD STREET SUITE 1400
PHILADELPHIA, PA 19102
215.732.0101
215.732.7790
Ctjoyce@spearwilderman.com
sshopp@spearwilderman.com
Accepts eService
**Served via email and first class mail*
(Counsel for IBEW Local 614)

NAZAARAH SABREE ESQUIRE
SHARON E WEBB ESQUIRE
REBECCA LYTTLE ESQUIRE
OFFICE OF SMALL BUSINESS ADVOCATE FORUM PLACE
555 WALNUT STREET 1ST FLOOR
HARRISBURG, PA 17101
717.783.2525
717.783.2831
swebb@pa.gov
relyttle@pa.gov
ra-sba@pa.gov
Served via email

JONATHAN NASE ESQUIRE
DAVID P ZAMBITO ESQUIRE
COZEN O'CONNOR
17 NORTH SECOND STREET SUITE 1410
HARRISBURG, PA 17101
717.773.4191

717.703.5892
jnase@cozen.com
dzambito@cozen.com
Accepts eService
(Counsel for UPENN)

CHARIS MINCAVAGE ESQUIRE
ADEOLU A BAKARE ESQUIRE
BRIGID LANDY KHURI ESQUIRE
MCNEES WALLACE & NURICK
100 PINE STREET
PO BOX 1166
HARRISBURG, PA 17108
717.237.5437
717.232.8000
cmincavage@mwn.com
abakare@mcneeslaw.com
bkhuri@mcneeslaw.com
Accepts eService
(Counsel for PAIEUG)

CHRISTINA SAPPEY
698 UNIONVILLE ROAD
KENNETT SQUARE PA 19348
484.200.8264
RepSappey@pahouse.net
Accepts eService

ALAN MCCARTHY
705 E BARNARD ST
WEST CHESTER PA 19382
484.467.2845
alanmccarthy25@hotmail.com
Accepts eService

/s/ Morgan L. Bigelow