

ED GAINNEY  
MAYOR



Krysia Kubiak  
CITY SOLICITOR

CITY OF PITTSBURGH  
**DEPARTMENT OF LAW**  
CITY-COUNTY BUILDING

July 25, 2024

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**Re: Pennsylvania Public Utility Commission v. Duquesne Light Company;  
Docket No. 2024-3046523**

*Petition to Intervene*

Dear Secretary Chiavetta:

Please find the enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the City of Pittsburgh ("City") in the above referenced matter.

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.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jesse I. Exilus", with a long horizontal flourish extending to the right.

Jesse I. Exilus  
*Counsel for the City of Pittsburgh*

Enclosures

c: Office of Administrative Law Judge (via email: mhoyer@pa.gov)  
Certificates of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2024-3046523  
 :  
 Duquesne Light Company :

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**PETITION TO INTERVENE OF  
CITY OF PITTSBURGH**

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TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, the City of Pittsburgh ("City" or "Petitioner") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, the City states as follows:

1. The City, a Home Rule Municipality organized and existing under the Home Rule charter and Options Law 53 Pa.C.S. § 2901 et seq., and city of the second class by statutory designation, is a political subdivision of the Commonwealth of Pennsylvania and maintains its physical address at, 313 City-County Building, 414 Grant Street, Pittsburgh, PA 15219

2. The name and address of Petitioner's attorneys are:

Krysia M. Kubiak, City Solicitor  
Jesse I. Exilus, Deputy City Solicitor  
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3. On March 20, 2024, Duquesne Light Company ("Duquesne Light" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Supplement No. 71 to the Company's Tariff Electric – Pa. P.U.C. No. 25 ("Filing"), representing a request for a general increase in the Company's electric distribution rates of approximately \$133 million to be effective May 20, 2024.

4. On April 4, 2024, the Commission entered an Order suspending the Filing until December 20, 2024, unless otherwise directed by Order of the Commission, pursuant to 66 Pa.C.S. § 1308(d). The effective date of new rates was suspended until December 20, 2024.

5. The City owns real property comprising more than 300 facilities within its jurisdiction.

6. The City is a Duquesne Light customer at many of its facilities.

7. As a customer of Duquesne Light, the City has a direct, immediate impact and substantial interest in the lawfulness and reasonableness of all charges imposed on it by Duquesne and seeks to protect that interest by intervening in this proceeding.

#### Standards for Intervention

8. Eligibility to intervene Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code §5.72. The Commission's regulations provide that in order to intervene, a party must have a "right or interest" sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding, and which is not being adequately represented by existing participants, and where the petitioner may be bound the actions of the

Commissioner where right and interest is otherwise the public interest. *Id.*

### Reasons for Intervention

9. The City is a municipality located within Allegheny County serving over 300,000 residents as well as numerous small and larger businesses within its jurisdiction. The City manages and operates over 300 facilities that consume electricity. All of the City's facilities and operations are located within Duquesne's service territory. Accordingly, the cost, reliability, and quality of the electric distribution service provided by Duquesne are issues of significant concern to the City.

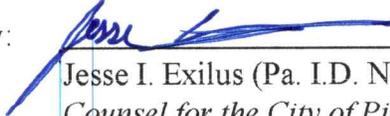
10. Additionally, as a governmental entity, the proposed rate charges being investigated impact the public as a whole, which is a direct, significant, and unique impact as the City is funded with local taxes, and state and federal funds. These interests cannot be adequately represented or protected by any other party.

11. The City's intervention at this stage will not delay or cause prejudice to any current party in this proceeding. The City will take the proceeding as it stands and accept the schedule and procedural rules the parties agreed to as set forth in the Prehearing Order issued by the ALJ on May 1, 2024.

12. The Commission's final determination in this proceeding may directly impact the rates, terms, and conditions of the electric service that the City receives from the Company. The City therefore has a direct, substantial, and unique interest in the outcome of this proceeding that is not represented by any other party. *See* 52 Pa. Code § 5.72(a)(2).

**WHEREFORE**, the City requests that the Commission grant this Petition to Intervene and provide the City with full party status in this proceeding.

Respectfully submitted,

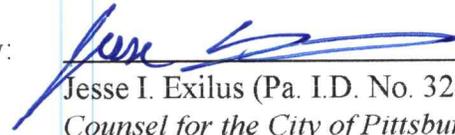
By:   
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Jesse I. Exilus (Pa. I.D. No. 324073)  
*Counsel for the City of Pittsburgh*

Dated: July 25, 2024

**VERIFICATION**

I, Jesse I. Exilus, Counsel for the City of Pittsburgh, hereby state that the factors 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).

By:



Jesse I. Exilus (Pa. I.D. No. 324073)  
*Counsel for the City of Pittsburgh*

Dated: July 25, 2024

**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 in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

**VIA E-MAIL**

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By:



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Jesse I. Exilus (Pa. I.D. No. 324073)

Dated: July 25, 2024