

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

PECO Energy Company – Electric Division

Docket No. R-2026-3060859

**PETITION TO INTERVENE OF INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL UNION 614**

Pursuant to sections 5.71-5.76 of the Pennsylvania Public Utility Commission’s (Commission or PUC) Rules of Practice and Procedure, 52 Pa. Code §§ 5.71-5.76, the International Brotherhood of Electrical Workers Local Union 614 (IBEW Local 614, Local 614, or the Local), by its counsel Willig, Williams, & Davidson, submits this Petition to Intervene in the above-captioned proceeding. In support thereof, IBEW Local 614 states as follows:

1. On March 30, 2026, PECO Energy Company (PECO or the Company) filed with the Commission its Tariff Electric – Pa. P.U.C. No. 9 (Tariff Filing), which was assigned this Docket No. R-2026-3060859. PECO seeks an annual electric rate increase of approximately \$429 million, effective May 29, 2026. PECO asserts that the rate hike is to enable the Company to “invest in the infrastructure needed to maintain and improve safety, reliability, and customer-service levels.” *See* Statement of Specific Reasons for Proposed Increase in Electric Rates at 12.

2. The Commission’s regulations provide that “a petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought.” 52 Pa. Code § 5.72(a). Intervention is permitted by persons who possess “an

interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.” 52 Pa. Code § 5.72(a)(2).

3. Pennsylvania law recognizes that employees of a utility have an interest in the adequacy, efficiency, safety, and reasonableness of a utility’s services and facilities. 66 Pa. Cons. Stat. § 1501 (“Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities . . . for the accommodation, convenience, and safety of its patrons, *employees*, and the public.”) (emphasis added).

4. Even though Section 5.72 speaks of the rights of a “person” to intervene, the Commonwealth Court has consistently stated that “[a]n association may have standing as a representative of its members . . . as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing.” *Energy Cons. Council of Pa. v. Pa. PUC*, 995 A.2d 465, 476 (Pa. Commw. 2010) (second alteration in original) (citing *Tripps Park v. Pa. PUC*, 415 A.2d 967 (Pa. Commw. 1980); *Parents United for Better Schools v. Sch. Dist. of Phila.*, 646 A.2d 689 (Pa. Commw. 1994)).

5. IBEW Local 614 is a labor organization as defined by the National Labor Relations Act of 1935, 29 U.S.C. § 152(5). The Local is the exclusive bargaining representative for approximately 1,460 PECO employees, roughly 70% of whom work in the Company’s Electric Division. In addition, the Local and many of its members are also PECO customers.

6. IBEW Local 614 is located at 4613 West Chester Pike, Upper Level, Newtown Square, PA 19073.

7. As the exclusive bargaining representative for approximately 1,460 PECO employees, IBEW Local 614 has a direct and material interest in the Tariff Filing and in the outcome of this proceeding. The Tariff Filing addresses and will impact numerous aspects of PECO's Electric Division operations, including but not limited to the Company's capital investment plans, operations and maintenance programs and spending, information technology upgrades, and workforce and training programs, and its efforts to address reliability, safety, and customer service matters. Accordingly, PECO's unionized workforce represented by the Local is directly impacted by the Tariff Filing and this proceeding.

8. Given its unique status as the exclusive representative of hundreds of employees who work directly for PECO, no existing or potential party could adequately represent the interests of IBEW Local 614. *See* 52 Pa. Code § 5.72(a)(2).

9. IBEW Local 614 was a party to PECO's prior electric rate case proceeding in Docket No. R-2024-3046931. In that proceeding, the Local raised serious concerns about the Company's efforts to implement the Customer Information System platform and the effectiveness of the Company's workforce planning processes and hiring and retention practices, among other matters. In a public statement issued on March 12, 2026, PUC Chairman DeFrank recognized these customer service and workforce issues continue to require attention by the Company. IBEW Local 614 is uniquely positioned to provide an informed, on-the-ground perspective on how the Company and the Commission can effectively address these (and other) concerns.

10. IBEW Local 614 continues to review the Tariff Filing, including the accompanying direct testimony and exhibits, and to develop its positions on the matters presented therein.

Local 614 reserves the right to take positions and seek relief based on its review of the filings, discovery responses, or positions taken by other parties in this proceeding.

11. The name, address, and contact information of IBEW Local 614's attorneys, who are authorized to receive notices and communications on the Local's behalf, are:

Joseph D. Richardson, Esquire
Pa. Bar No. 311147
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
(t) 215-656-3655
jrichardson@wwdlaw.com

Samuel H. Datlof, Esquire
Pa. Bar No. 324716
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
(t) 215-656-3613
sdarlof@wwdlaw.com

12. Counsel for IBEW Local 614 consent to the service of documents by electronic mail to the email addresses listed above, as provided in 52 Pa. Code § 1.54(b)(3).

WHEREFORE, IBEW Local 614 respectfully requests that the Public Utility Commission enter an order granting the Local status as an intervenor with full party status in this proceeding.

Respectfully submitted,

WILLIG, WILLIAMS & DAVIDSON



Joseph D. Richardson, Esq. (Pa. Bar No. 311147)
Samuel H. Datlof, Esq. (Pa. Bar No. 324716)
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
(215) 656-3600
jrichardson@wwdlaw.com
sdarlof@wwdlaw.com

Dated: April 14, 2026

VERIFICATION

I, Joseph D. Richardson, hereby state that the facts contained in the foregoing petition are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Joseph D. Richardson
Date: April 14, 2026

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing petition has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

Dated on this 13th day of April, 2026.

VIA ELECTRONIC MAILING

Anthony E. Gay
anthony.gay@exeloncorp.com

Kenneth M. Kulak
ken.kulak@morganlewis.com

Matthew N. Korenoski
matthew.korenoski@exeloncorp.com

Mark A. Lazaroff
mark.lazaroff@morganlewis.com

Catherine Nguyen
catherine.nguyen@exeloncorp.com

Brooke E. McGlinn
brooke.mcglinn@morganlewis.com

Jeanne J. Dworetzky
jeanne.dworetzky@exeloncorp.com

Catherine G. Vasudevan
catherine.vasudevan@morganlewis.com

PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
267.533.1999 (dir)
215.568.3389 (fax)

Morgan, Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103
215.963.5384 (dir)
215.953.5001 (fax)

Allison Kaster
akaster@pa.gov

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commerce Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17105-3265

Darryl A. Lawrence
ra-oca@paoca.org

Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Philadelphia, PA 17101-1923

Rebecca Lyttle
relyttle@pa.gov

Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101



Dated: April 14, 2026

Joseph D. Richardson, Esq. (Pa. Bar No. 311147)
Samuel H. Datlof, Esq. (Pa. Bar No. 324716)
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
(215) 656-3600
jrichardson@wwdlaw.com
sdatlof@wwdlaw.com