

COMMONWEALTH OF PENNSYLVANIA



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May 7, 2026

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Petition of IBEW Local 614  
Requesting a Public, On-The-Record  
Investigation into the  
Reasonableness, Safety, Adequacy,  
and Sufficiency of the Service and  
Facilities of PECO Energy Company  
Docket No. P-2026-3062224

Dear Secretary Homsher:

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

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

Harrison W. Breitman, Esq.  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
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Enclosures

cc: The Honorable Charles E. Rainey, Jr. (email only: [crainey@pa.gov](mailto:crainey@pa.gov))  
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Certificate of Service

CERTIFICATE OF SERVICE

Petition of IBEW Local 614 Requesting a :  
Public, On-The-Record Investigation into :  
the Reasonableness, Safety, Adequacy, and : Docket No. P-2026-3062224  
Sufficiency of the Service and Facilities of :  
PECO Energy Company :  
:

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following 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 § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 7th day of May, 2026.

SERVICE BY E-MAIL ONLY

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Dated: May 7, 2026

/s/ Harrison W. Breitman  
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Counsel for:  
Darryl A. Lawrence  
Consumer Advocate

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of IBEW Local 614 Requesting a  
Public, On-The-Record Investigation into the :  
Reasonableness, Safety, Adequacy, and : Docket No. P-2026-3062224  
Sufficiency of the Service and Facilities of :  
PECO Energy Company :

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NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to 52 Pa. Code Sections 5.71-5.74 and 71 P.S. Sec. 309-4, the Office of Consumer Advocate hereby intervenes in the above-captioned proceeding through this Notice of Intervention and Public Statement. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the undersigned counsel at the contact information shown below.

Respectfully submitted,

Counsel for:  
Darryl Lawrence, Consumer Advocate  
Office of Consumer Advocate

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Phone: 717-783-5048  
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Dated: May 7, 2026

/s/ Harrison W. Breitman  
Harrison W. Breitman, Esq.  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
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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 Consumer Advocate determined to intervene and participate in the Petition of IBEW Local 614 Requesting a Public, On-The-Record Investigation into the Reasonableness, Safety, Adequacy, and Sufficiency of the Service and Facilities of PECO Energy Company (Petition) pursuant to the Commission's regulations under 52 Pa. Code Section 5.41.

On April 29, 2026, the International Brotherhood of Electrical Workers Local Union 614 (IBEW Local 614 or the Local), as the exclusive bargaining representative for approximately 1,430 PECO Energy Company (PECO or the Company) employees and as itself as a PECO customer, filed the Petition with the Commission. On April 30, 2026, IBEW Local 614 filed an amended Petition to revise its original Petition (Amended Petition).

In support of its request, IBEW Local 614 alleges that portions of PECO's electric distribution system are in serious disrepair, including splintered and rotting cross arms, degraded or missing cross arm support braces, frayed overhead wires, inadequately secured transformers, leaning and unstable utility poles, and dangerous "temporary" repairs to damaged poles. Amended Petition at 8-16. The Amended Petition asserts that these deficiencies appear to be systemic, widespread, and persistent across PECO's service territory, and may pose serious risks to system reliability and to the safety of customers, workers, and the public. Amended Petition at 16-23. The Local further alleges that historically underserved communities in PECO's service territory may be bearing a disproportionate share of service and reliability issues associated with degraded facilities. Amended Petition at 22-23. IBEW Local 614 also requests that, as part of the

investigation, the Commission consider whether to require PECO to: (i) develop and submit for Commission approval a Workforce Investment Plan; and (ii) submit regular, public reporting on relevant system performance metrics. Amended Petition at 25-27.

The Consumer Advocate determined to intervene in this proceeding to protect the interests of PECO's customers; to ensure that the issues raised in the Petition are fully and fairly investigated in accordance with Sections 1501 and 1505 of the Public Utility Code, the Commission's safety regulations at 52 Pa. Code Sections 57.28(a)–(c), and all other applicable statutes, regulations, and Commission Orders; to ensure that PECO's electric distribution service and facilities are safe, reasonable, adequate, and sufficient for the accommodation, convenience, and safety of its customers and the public; and to ensure that any rates, costs, or expenses resulting from corrective measures the Commission may direct as a result of the investigation are just and reasonable.