



SPILMAN THOMAS & BATTLE, PLLC

ATTORNEYS AT LAW

Barry A. Naum
Direct Dial (717) 795-2742
bnaum@spilmanlaw.com

April 29, 2013

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Petition of Equitable Gas Company, LLC for Approval of a Distribution System Improvement Charge; Docket No. P-2013-2342745

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the United States Steel Corporation ("U. S. Steel") 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.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 
Derrick Price Williamson
Barry A. Naum

BAN/lhi

Enclosures

c: Office of Administrative Law Judge (via First Class Mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Equitable Gas Company, LLC :
for Approval of a Distribution System : Docket No. P-2013-2342745
Improvement Charge :

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 FIRST CLASS MAIL

Johnnie E. Simms
Bureau of Investigation & Enforcement
PA Public Utility Commission
400 North Street
Harrisburg, PA 17101

Erin L. Gannon, Esq.
Darryl Lawrence, Esq.
Amy Hirkakis, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Steven Gray, Esq.
Acting Small Business Advocate
Sharon Webb, Esq.
Elizabeth Rose Triscari, Esq.
Office of Small Business Advocate
Commerce Bldg., Suite 1101
300 N. Second Street
Harrisburg, PA 17011

Charles E. Thomas, Jr., Esq.
Thomas J. Niesen, Esq.
Thomas, Long, Niesen & Kennard
212 Locust Street, Suite 500
P.O. Box 9500
Harrisburg, PA 17108-9500

Kevin J. Moody, Esq.
Pennsylvania Independent Oil &
Gas Association
212 Locust Street, Suite 00
Harrisburg, PA 17101-1510

Todd S. Stewart, Esq.
Hawke McKeon & Sniscak, LLP
100 North 10th Street
P.O. Box 1778
Harrisburg, PA 17101

David W. Gray, Esq.
John M. Quinn, Esq.
Equitable Gas Company, LLC
225 North Shore Drive
Pittsburgh, PA 15212-5861



Barry A. Naum

Dated: April 29, 2013

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Equitable Gas Company, LLC, for Approval : Docket No. P-2013-2342745
of a Distribution System Improvement Charge :

**PETITION TO INTERVENE
OF UNITED STATES STEEL CORPORATION**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, United States Steel Corporation ("U. S. Steel" or "Petitioner") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, U. S. Steel states as follows:

1. Petitioner is U. S. Steel.
2. The name and address of Petitioner's attorneys are:

Derrick Price Williamson
Barry A. Naum
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2742
Fax: (717) 795-2743
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Counsel to U. S. Steel consents to service of documents by electronic mail at the e-mail addresses above.

3. On January 29, 2013, Equitable Gas Company, LLC ("Equitable") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition seeking approval of the implementation of a Distribution System Improvement Charge ("DSIC") for the recovery of costs related to the "repair, improvement, and replacement of eligible property and

infrastructure" pursuant to the Commission's Final Implementation Order at Docket No. M-2012-2293611.¹ Petition, p. 1. Equitable specifically seeks approval of a DSIC that would be calculated at 0.36% of the total amount of each customer's monthly distribution bill, effective April 1, 2013. See Appendix A, Proposed Tariff Supplement No. 95, Revised Page Nos. 101-02. Although proposing that the DSIC "may be reduced or eliminated for any customers with competitive alternatives and negotiated contracts," Equitable's DSIC would be applicable to all customer classes, including Rate Schedule DDS. Id. at Revised Page No. 104.

4. U. S. Steel, headquartered in Pittsburgh, Pennsylvania, is an integrated steel producer with major production operations in the United States, Canada, and Central Europe, and an annual raw steelmaking capability of 29.3 million net tons. U. S. Steel manufactures a wide range of value-added steel sheet and tubular products for the automotive, appliance, container, industrial machinery, construction, and oil and gas industries. Controlling the costs associated with the production of steel, including the considerable energy costs related to its operations, is of critical importance to U. S. Steel. In that regard, U. S. Steel consumes over 8 million Mcf of natural gas in Pennsylvania on an annual basis. Accordingly, the cost, reliability, and quality of natural gas supplies and services are issues of significant concern to U. S. Steel.

5. U. S. Steel employs over 5,400 full-time employees at its numerous facilities in and around Allegheny County, Pennsylvania, including its Clairton Coke Plant, Irvin Plant, Edgar Thomson Plant, and McKeesport Tubular Operations facility. These operations are all located within Equitable's service territory, making U. S. Steel one of the largest, if not the single largest, customer on the Equitable system. U. S. Steel currently takes natural gas delivery


¹ Re Implementation of Act 11 of 2012, Docket No. M-2012-2293611 (Final Implementation Order entered August 2, 2012) ("Final Implementation Order").

service from Equitable pursuant to a negotiated delivery supply agreement under Equitable's existing Rate Schedule DDS.

6. The cost of purchasing natural gas utility services comprises a significant portion of U. S. Steel's production costs. Therefore, the resolution of Equitable's proposed DSIC may have a direct impact on U. S. Steel's interests, which are not adequately represented by existing participants in the case. Given the substantial economic and employment benefit that U. S. Steel provides in the Equitable service territory and the surrounding region of Pennsylvania, U. S. Steel's interests are of such a nature that its participation in this case is in the public interest. See 52 Pa. Code § 5.72(a)(2) & (3).

WHEREFORE, United States Steel Corporation respectfully requests that the Commission grant this Petition to Intervene and provide United States Steel Corporation with full party status in this proceeding.

Respectfully submitted,

By 

Derrick Price Williamson (Pa. Attorney I.D. #69274)
Barry A. Naum (Pa. Attorney I.D. #204869)
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2742
Fax: (717) 795-2743
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Counsel to United States Steel Corporation

Dated: April 29, 2013

VERIFICATION

I, Barry A. Naum, Counsel to United States Steel Corporation, hereby state that the facts 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).

Date: April 29, 2013



Barry A. Naum