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April 9, 2018

Rosemary Chiavetta, Secretary  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg PA 17105-3265

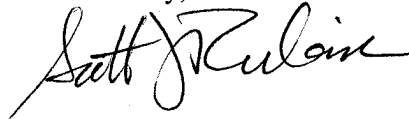
Re: Pa. PUC v. Duquesne Light Co.  
Docket No. R-2018-3000124

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum of International Brotherhood of Electrical Workers Local 29 in the above-referenced proceeding. The document was served on all parties of record as shown on the attached Certificate of Service.

The document was filed electronically with the Commission on this date.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott J. Rubin". The signature is fluid and cursive, with the first name "Scott" and last name "Rubin" clearly distinguishable.

Enclosure

cc: Hon. Katrina L. Dunderdale, ALJ  
All parties of record

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3000124
	:	
Duquesne Light Company	:	

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PREHEARING MEMORANDUM  
OF  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 29

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In accordance with the Administrative Law Judge’s Prehearing Conference Order dated April 4, 2018, and 52 Pa. Code § 5.222(d)(1), International Brotherhood of Electrical Workers, Local 29 (“IBEW”), hereby files this Prehearing Memorandum and provides the following information to the Administrative Law Judge and the active parties to this proceeding.

Procedural History: IBEW filed a Petition to Intervene on April 9, 2018.

Issues: IBEW has been reviewing the exhibits and testimony filed by Duquesne Light Company (“Duquesne”). At this stage, IBEW has not identified any specific issues on which it would file direct testimony. IBEW will focus its attention on issues that could have a direct and substantial impact on its members. This will include, but not be limited to, employee-related issues (such as employment levels, productivity, benefit costs, and the status of Duquesne’s pension fund), as well as issues related to the safety and reliability of service. IBEW has not determined the extent to which it will need to participate in order to represent the interests of its members, but it will pursue these

issues, as necessary, through discovery, cross-examination, direct and rebuttal testimony, and the filing of briefs and other pleadings, as required to protect its interests.

Witnesses: IBEW has not identified the need for, or identity of, any witnesses at this time. If it is determined that a witness is necessary, IBEW will notify the Administrative Law Judge and parties as soon as that person is identified.


Service List: IBEW requests that its entry on the service list should be for its counsel, as follows:

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Pursuant to 52 Pa. Code § 1.54(b)(3), IBEW consents to the electronic service of all documents at the e-mail address shown above.

Schedule: Counsel for IBEW will work with counsel for other parties and the Administrative Law Judge to develop a schedule for this proceeding.

Respectfully submitted,



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Counsel for IBEW Local 29

Dated: April 9, 2018

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CERTIFICATE OF SERVICE

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I hereby certify that I have this day served a true copy of the foregoing document upon the following parties by electronic mail (where an email address is shown) and first class mail.

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4/9/2018  
Date

  
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Scott J. Rubin, Counsel for IBEW Local 29