# SCOTT J. RUBIN

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### April 17, 2018

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

# Re: Pa. PUC v. PECO Energy Co. - Electric Division Docket No. R-2018-3000164

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of Electrical Workers Local 614 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, Scott & Cerloin

Enclosure

cc: All parties of record

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v.

Docket No. R-2018-3000164

PECO Energy Company - Electric Division

# PETITION TO INTERVENE OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 614

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, the International Brotherhood of Electrical Workers, Local 614 ("IBEW"), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, IBEW states as follows:

1. IBEW is the authorized collective bargaining representative for approximately 1,250 employees of PECO Energy Company ("PECO"). Local 614 maintains an office located at 4613 West Chester Pike, Upper Level, Newtown Square, PA 19073, where it is both an electric and gas customer of PECO.

2. IBEW will be represented in this case by, and all documents should be served upon,

its attorneys:

Scott J. Rubin (PA Atty. Id. 34536) 333 Oak Lane Bloomsburg, PA 17815-2036 Phone: 570-387-1893 Email: scott.j.rubin@gmail.com Charles T. Joyce (PA Atty. Id. 51254) Spear Wilderman, P.C. 230 South Broad Street, Suite 1400 Philadelphia, PA 19102 Phone: (215) 732-0101 E-mail: ctjoyce@spearwilderman.com

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

4. On March 29, 2018, PECO filed a request for a base rate increase of approximately\$82 million.

5. IBEW anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of PECO's employees and retirees and as a customer of PECO. For example, PECO's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among others. In addition, issues may be raised by various parties concerning the safety or reliability of PECO's service that will or may have a direct effect on IBEW and its members.

6. No other party to this proceeding represents the interests of IBEW and its members.

7. IBEW intends to actively participate in this proceeding on such matters that affect its interests as a customer of PECO and the interests of its members as employees and retirees of PECO. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by PECO and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers, Local 614 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,

Scott J. Rubin (PA Atty. Id. 34536) 333 Oak Lane Bloomsburg, PA 17815-2036 Voice: 570-387-1893 Email: scott.j.rubin@gmail.com

Charles T. Joyce (PA Atty. Id. 51254) 230 South Broad Street, Suite 1400 Philadelphia, PA 19102 Phone: (215) 732-0101 e-mail: ctjoyce@spearwilderman.com

Counsel for IBEW Local 614

Dated: April 17, 2018

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## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

Docket No. R-2018-3000164

PECO Energy Company - Electric Division

v.

### VERIFICATION

I, Emil J Meyer, the President and Business Manager of International Brotherhood of Electrical Workers, Local 614, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, 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).

Date: 4-16-18

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

V.\_

Docket No. R-2018-3000164

PECO Energy Company - Electric Division

#### VERIFICATION

I, Lawrence J. Anastasi, the Business Agent of International Brotherhood of Electrical Workers, Local 614, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, 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).

Date: 4/16/18

## CERTIFICATE OF SERVICE

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.

ROMULO L. DIAZ, JR. / JACK R. GARFINKLE / W. CRAIG WILLIAMS / MICHAEL S. SWERLING PECO ENERGY COMPANY 2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA, PA 19101 romulo.diaz@exeloncorp.com, jack.garfinkle@exeloncorp.com, craig.williams@exeloncorp.com, michael.swerling@exeloncorp.com,

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Date

Scott J. Rubin, Counsel for IBEW Local 614