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4. As provided in 52 Pa. Code § 1.54(b)(3), counsel consents to the service of documents by electronic mail at the e-mail addresses shown above.

5. Petitioner respectfully requests the parties provide an electronic copy of communications to LIUNA, in care of:

May Va Lor  
LIUNA  
905 16<sup>th</sup> Street NW  
Washington, DC 20016  
Phone: (202) 942-2330  
Email: [mlor@liuna.org](mailto:mlor@liuna.org)

6. On January 29, 2019, UGI Gas of Pennsylvania (“UGI”) submitted a rate filing, Supplement No. 267 to its Tariff Gas PA PUC No. 7 and 7S, which proposes to increase rates by approximately \$71.1 million per year, or 8.9%.

7. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part 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). Section 5.72 further provides that the right or interest may be one “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)

8. A significant part of this case relates to capital expenditures meant to enhance the safety of UGI’s system. UGI relies heavily on outside construction contractors that employ

LDCEPA's members to install, maintain, and upgrade its gas infrastructure. LDCEPA's members that work on the front lines of UGI's system tasked with constructing or maintaining gas infrastructure will be directly affected by any changes in the scope and pace of accelerated pipe replacement program. The case also has significant workforce training commitments and workforce safety programs that appear to address UGI's in-house workforce however the significant role of contractor employees who often work side-by-side in-house employees is not addressed.

9. Should LDCEPA's intervention be granted, LDCEPA requests the right to actively participate in this proceeding, including presentation of direct or rebuttal testimony and the cross-examination of witnesses in this proceeding.

9. No other parties to this proceeding represent the interest of LDCEPA.

10. LDCEPA takes no position at this time regarding UGI's rate proposal.

WHEREFORE, The Laborers District Council of Eastern Pennsylvania, respectfully requests the right to intervene as an active party in this proceeding, and placed on the service list.

Respectfully Submitted,

/s/ Ira H. Weinstock

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Date: March 7, 2019

Counsel for the Laborers District Council of Eastern Pennsylvania

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2018-3006814  
 :  
 UGI Utilities-Gas Division. :

**VERIFICATION**

I, Anthony Seiwel, Business Manager of Laborers' District Council of Eastern Pennsylvania, 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 here are made subject to the penalties of 18 Pa. C.S. § 4904 (related to unsworn falsification to authorities).

Date: 3/7/19

  
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