

local unions in eastern Pennsylvania have provided workers pursuant to collective bargaining agreements with UGI's pipeline contractors. LDCEPA represents approximately 430 construction workers who are employed by various underground utility contractors and who perform construction activities on UGI's distribution system.

UGI has requested rate relief in part to support the maintenance and improvement of system safety and reliability by incorporating new investments related to distribution infrastructure for growth and replacement of essential facilities. UGI has invested over \$600 million in the past five years, and plans to continue accelerated investment. UGI currently has the highest percentage of contemporary mains in Pennsylvania, and it projects it will eliminate all at-risk pipe by September of 2041. UGI relies heavily on outside construction contractors that employ LDCEPA's members to install, maintain, and upgrade its gas infrastructure. UGI's outside construction workforce have been vital to meeting UGI's goals of accelerated infrastructure improvement.

LDCEPA has a vital interest in these proceeding as the bargaining representative of the workers employed by UGI's distribution construction contractors. LDCEPA's participation in these proceedings will be vital to the issue of the continuing safe performance of pipeline rehabilitation and replacement work by UGI. LDCEPA provides extensive training for members employed by UGI's outside contractors, and will provide important testimony to the Commission with respect to its role in this important public interest.

III. LIST OF WITNESSES AND SUBJECT OF TESTIMONY

LDCEPA intends to present the following witnesses:

1. Anthony J. Seiwel, President and Business Manager, Laborers' District Council of Eastern Pennsylvania

2. James Wethington, Training Director, Laborers' District Council of Eastern Pennsylvania Education and Training Fund

Witness Seiwill will testify concerning the scope and history of work performed by LDCEPA members on UGI's pipeline projects. He will provide testimony concerning the essential services contractor employees perform to support system safety and reliability.

Witness Wethington will provide testimony concerning the training programs provided through the Education and Training Center for union members employed (both current and prospective) with pipeline contractors.

IV. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS, AND BRIEFS

LDCEPA will work with the other parties and Deputy Chief Administrative Law Judge Christopher P. Pell to develop a mutually agreeable schedule.

V. SETTLEMENT

LDCEPA is willing to participate in settlement negotiations with any and all parties at any time during this proceeding.

Respectfully Submitted,

/s/ Ira H. Weinstock

Ira H. Weinstock, Esq., PA ID: 1602
Ira H. Weinstock, P.C.
800 North 2nd Street
Harrisburg, PA 17102
Phone: 717-238-1657
E-mail: iweinstock@weinstocklaborlaw.com

Date: March 11, 2019