

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

| | | |
|---------------------------------------|---|--------------------|
| Illinois Commerce Commission |) | |
| On its own motion |) | |
| |) | |
| v. |) | |
| |) | |
| The Peoples Gas, Light & Coke Company |) | Docket No. 15-0186 |
| |) | |
| Investigation into Anonymous Letter |) | |
| Alleging Misconduct and Improprieties |) | |
| Related to The Peoples Gas, Light & |) | |
| Coke Company's Accelerated Main |) | |
| Replacement Program |) | |

**VERIFIED PETITION TO INTERVENE OF
LOCAL 18007, UTILITY WORKERS OF AMERICA, AFL-CIO**

LOCAL 18007, UTILITY WORKERS OF AMERICA, AFL-CIO (“Local 18007”), through one of its attorneys, hereby petitions the Illinois Commerce Commission (the “Commission”) for permission to intervene in the above-captioned proceeding. In support of this Petition, Local 18007 states as follows:

1. Local 18007 represents the employees of Peoples Gas, Light & Coke Company (“PGLC”), who deliver natural gas to PGLC’s residential and commercial customers and operate, maintain and repair the physical infrastructure necessary to provide this service in the City of Chicago.
2. Local 18007 members’ jobs, wages and working conditions will be directly and materially affected by the outcome of this proceeding.
3. The concerns of the workforce represented by Local 18007, particularly as to staffing levels and workplace safety, have a direct bearing on the progress of the Accelerated Main Replacement Program (AMRP) which is the subject of this proceeding.
4. Local 18007 accepts service by electronic means as provided for in Section 200.1050 of the Illinois Commerce Commission’s Rules of Practice.

5. For purposes of the Service List, all documents should be served upon the following:

Ian Elfenbaum
Attorney for Local 18007
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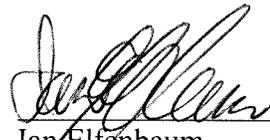
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Johanna Ryan, paralegal
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WHEREFORE, Local 18007, Utility Workers of America, AFL-CIO, respectfully petitions this Commission for leave to intervene in the above-captioned proceeding.

Dated: April 3, 2015

Respectfully submitted,



Ian Elfenbaum
Attorney for Local 18007

Elfenbaum Evers & Amarilio, P.C.
940 W. Adams Street, Suite 300
Chicago IL 60607
(312) 226-2650

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS:

VERIFICATION

I affirm that I have knowledge of the contents of this Petition, which are true and accurate to the best of my knowledge.



Ian Effenbaum
Attorney for Local 18007

Notarized this 3rd day of April, 2015



Notary Public

