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June 2, 2016

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

Re: Pa. Public Utility Commission v. Pennsylvania
Electric Company, Docket No. R-2016-2537352

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of Electrical Workers, Local 459, in the above-referenced proceeding.

The document was filed electronically with the Commission on this date and is being served on all parties of record as shown on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott J. Rubin". The signature is written in a cursive style with a large, stylized "S" and "R".

Enclosure

cc: per certificate of service

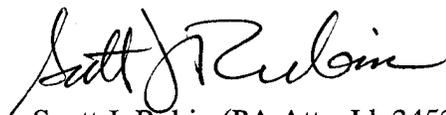
5. IBEW anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of Penelec's employees and retirees. For example, Penelec's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among others. In addition, the filing contains information concerning the reliability of Penelec's service, and various changes being undertaken allegedly to improve safety and reliability, 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 Penelec and a representative of its members as employees, retirees, and/or customers of Penelec. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by Penelec and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers Local 459 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



Scott J. Rubin (PA Atty. Id. 34536)

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Email: scott.j.rubin@gmail.com

Counsel for:

IBEW Local 459

Dated: June 2, 2016

VERIFICATION

I, Paul Cameron, the Business Manager of International Brotherhood of Electrical Workers, Local 459, 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:

6-2-16

Paul L. Cameron

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served this day a true copy of the foregoing document upon the parties listed below by electronic mail and U.S. mail, first-class, postage prepaid, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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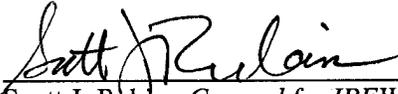
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Dated: June 2, 2016



Scott J. Rubin, Counsel for IBEW Local 459