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June 15, 2016

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

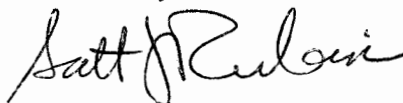
Re: Pa. Public Utility Commission v. Pennsylvania
Electric Company, Docket No. R-2016-2537352

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum 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,



Enclosure

cc: Mary D. Long, Administrative Law Judge
per certificate of service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

PREHEARING MEMORANDUM OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS LOCAL 459

In accordance with the Administrative Law Judge's Prehearing Conference Order dated June 9, 2016, and 52 Pa. Code § 5.222(d)(1), International Brotherhood of Electrical Workers Local 459 ("IBEW") hereby files this Prehearing Memorandum and provides the following information to the Administrative Law Judge and the active parties to this proceeding.

Procedural History: On June 2, 2016, IBEW filed a Petition to Intervene in the Pennsylvania Electric Company rate case, Docket No. R-2016-2537352. In that Petition, IBEW explained that it was a customer of Penelec and also represented the interests of more than 400 employees of Penelec relating to various issues that will or may be raised in this proceeding.

Issues: IBEW has reviewed the utilities' filings and testimony and various responses to discovery requests. At this stage, IBEW has not identified any specific issues on which it would file direct testimony. IBEW expects to direct its attention to issues that could have a direct and substantial impact on its members. This will include, but not be limited to, employee-related issues (such as employment levels, productivity, benefit costs, and the status of the utilities' pension funds), as well as issues related to the safety and reliability of service.

IBEW has not determined the extent to which it will need to participate in order to represent the interests of their members, but it will pursue these issues, as necessary, through discovery, cross-examination, direct or rebuttal testimony, and the filing of briefs and other pleadings, as required to protect their interests.

Witnesses: IBEW has not identified the need for, or identity of, any witnesses at this time. If it is determined that one or more witnesses will be necessary, IBEW will notify the Administrative Law Judge and parties as soon as the identities of any such witnesses are known.

Service List: IBEW's entry on the service list should be for its counsel, as follows:

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

Schedule: Counsel for IBEW has been working with counsel for other parties to develop a schedule for this proceeding. It is hoped that a consensus schedule will be provided to the Administrative Law Judge at or before the prehearing conference.

Respectfully submitted,



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Counsel for:
IBEW Local 459

Dated: June 15, 2016

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/or 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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Dated: June 15, 2016



Scott J. Rubin, Counsel for IBEW Local 459