



5). Local 614 anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of PECO's employees and as a customer of PECO. For example, PECO's filing includes mention of increased operating costs due to employees' "annual wage and salary adjustments; and . . . substantial increases in the costs of providing healthcare, pensions and other benefits to its workforce." In addition, issues may be raised by various parties concerning the safety or reliability of PECO's service that will or may have a direct effect on Local 614 and its members.

6). No other party to this proceeding represents the interests of Local 614 and its members.

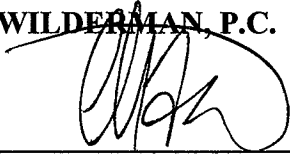
7). Local 614 intends to actively participate in this proceeding on such matters that affect its interests as a customer of PECO and the interests of its members as employees of PECO. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by PECO and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers Local 614, AFL-CIO, respectfully requests the right to intervene as an active party in this proceeding.

**Respectfully submitted,**

**SPEAR WILDERMAN, P.C.**

**BY:**

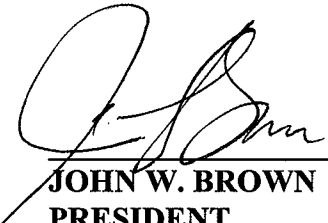
  
\_\_\_\_\_  
**CHARLES T. JOYCE, ESQUIRE**  
Attorney I.D. #51254  
230 S. Broad Street, Suite 1400  
Philadelphia, Pennsylvania 19102  
(215) 732-0101/(215) 732-7790 (Fax)  
[Ctjoyce@spearwilderman.com](mailto:Ctjoyce@spearwilderman.com)

**Attorney for International Brotherhood of  
Electrical Workers Local 614, AFL-CIO**

**Dated: April 12, 2010**

**VERIFICATION**

I, **JOHN W. BROWN**, 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.

  
\_\_\_\_\_  
**JOHN W. BROWN**  
**PRESIDENT**  
**IBEW Local 614, AFL-CIO**

**Date: April 12, 2010**

---

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
v. : Docket No. R-2010-2161575  
PECO Energy Company :

CERTIFICATION OF SERVICE

I hereby certify that I have this 12<sup>th</sup> day of April, 2010, served a true and correct copy of the foregoing Petition to Intervene upon the participants listed below, by First Class Mail:

Veronica Smith  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Harry Geller, Esquire  
John Gerhard, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, Pennsylvania 17101

Anthony E. Gay, Esquire  
Associate General Counsel  
Jack R. Garfinkle, Esquire  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street S23-1  
Philadelphia, Pennsylvania 19103

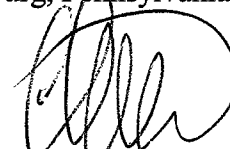
Johnnie E. Simms, Esquire  
Senior Prosecutor  
Office of Trial Staff  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
2 West Commonwealth Keystone Building  
Harrisburg, Pennsylvania 17105

Irwin A. Popowsky, Esquire  
Consumer Advocate  
Tanya McCloskey, Esquire  
Senior Assistant Consumer Advocate  
Candis A. Tunilo, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1921

William R. Lloyd, Esquire  
Small Business Advocate  
Daniel G. Asmus, Esquire  
Assistant Small Business Advocate  
Sharon Webb, Esquire  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, Pennsylvania 17101

Thomas Tuffey, Esquire  
Penn Future  
1518 Walnut Street, Suite 1100  
Philadelphia, Pennsylvania 19102

Charis Mincavage, Esquire  
Barry A. Naum, Esquire  
Shelby Linton-Keddie, Esquire  
McNees Wallace & Nurick  
P.O. Box 1166  
100 Pine Street  
Harrisburg, Pennsylvania 17108-1166

  
\_\_\_\_\_  
**CHARLES T. JOYCE, ESQUIRE**  
Attorney for IBEW Local 614