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April 23, 2010

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

Re: Pa. P.U.C. v. PPL Electric Utilities Corporation  
Docket No. R-2010-2161694

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of Electrical Workers, Local 1600, in the above-referenced proceeding.

The document was filed electronically with the Commission on this date.

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 initial "S".

Enclosure

cc: per Certificate of Service  
Veronica Smith, Chief Administrative Law Judge



4. On March 31, 2010, PPL filed a request for a base rate increase of approximately \$114.7 million.


5. IBEW anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of PPL's employees and retirees and as a customer of PPL. For example, PPL's filing includes claims based on the projected number of employees, wages, benefits, training costs, and many other factors that will or may have a direct effect on IBEW and its members. In addition, issues may be raised by various parties concerning the safety or reliability of PPL's service and various expense items that will or may have a direct effect on IBEW and its members.

6. No other party 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 PPL and the interests of its members as employees and retirees of PPL. Such participation may include the presentation of testimony and the cross-examination of witnesses presented by PPL and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers, Local 1600, respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,

  
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Counsel for IBEW Local 1600

Dated: April 23, 2010

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VERIFICATION

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I, Lester Ettl, the President of International Brotherhood of Electrical Workers, Local 1600, 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: 4-23-10

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing upon the following parties to this proceeding by electronic mail.

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Dated: April 23, 2010