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October 26, 2010

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

Re: Joint Application of West Penn Power Company
d/b/a Allegheny Power, Trans-Allegheny Interstate
Line Company and FirstEnergy Corp. for a
Certificate of Public Convenience under Section
1102(a)(3) of the Public Utility Code approving a
change in control of West Penn Power Company
and Trans-Allegheny Interstate Line Company
Docket No. A-2010-2176520
Docket No. A-2010-2176732

Dear Secretary Chiavetta:

Enclosed for filing please find the Statement in Support of Settlement of International
Brotherhood of Electrical Workers 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 fluid and cursive, with the first name "Scott" and last name "Rubin" clearly distinguishable.

Enclosure

cc: per Certificate of Service
Wayne Weisman, Administrative Law Judge
Mary D. Long, Administrative Law Judge

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of West Penn Power	:	
Company d/b/a Allegheny Power, Trans-	:	
Allegheny Interstate Line Company and	:	
FirstEnergy Corp. for a Certificate of Public	:	Docket No. A-2010-2176520
Convenience under Section 1102(a)(3) of the	:	Docket No. A-2010-2176732
Public Utility Code approving a change in	:	
control of West Penn Power Company and	:	
Trans-Allegheny Interstate Line Company	:	

STATEMENT IN SUPPORT OF SETTLEMENT
OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

On June 2, 2010, the International Brotherhood of Electrical Workers (“IBEW”), representing more than 5,000 FirstEnergy employees, filed a Petition to Intervene in this proceeding. In that petition, IBEW indicated that it was concerned about the following issues: “the impact of the transaction on FirstEnergy’s operations in Pennsylvania (including the safety and reliability of service); impacts on the employees of FirstEnergy, including any changes in employment levels, pension and other post-retirement benefits (and the assets necessary to ensure the provision of those benefits); and other potential employment-related impacts.”

IBEW did not file testimony or participate in the hearings in this matter. IBEW, however, has carefully reviewed the voluminous discovery produced by the Joint Applicants, as well as the testimony filed by all parties. IBEW also actively engaged in settlement negotiations with the Joint Applicants.

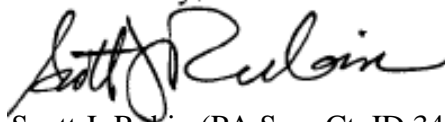
Based on its review of the documents, record evidence, and the Joint Petition for Partial Settlement (“Settlement”) IBEW has concluded that the Settlement adequately addresses IBEW’s concerns before this Commission and is in the public interest.

In particular, the Settlement, in conjunction with the Joint Applicants’ testimony, provides some certainty for FirstEnergy employees during a reasonable transition period. FirstEnergy has committed that it will not reduce its utility workforce (such as line and substation workers) as a result of the merger. Joint Applicants St. 1 (Alexander), p. 14.

The Settlement also contains provisions to ensure the safety and reliability of FirstEnergy’s distribution service. Paragraphs 51 and 52 of the Settlement deal specifically with FirstEnergy reliability issues. These provisions help to ensure that FirstEnergy’s attempts to achieve synergy savings from the merger will not come at the expense of the safety and reliability of its service to Pennsylvania consumers.

WHEREFORE, the International Brotherhood of Electrical Workers respectfully requests the Administrative Law Judges and Pennsylvania Public Utility Commission to approve the proposed transaction subject to all of the terms and conditions of the Joint Petition for Partial Settlement.

Respectfully submitted,



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Counsel for IBEW

Dated: October 26, 2010

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, or first class mail (where an e-mail address is not listed).

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Dated: October 26, 2010