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June 7, 2010

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Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, Pennsylvania 17120

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

Pennsylvania Public Utility Commission v. PECO Energy  
Docket No. R-2010-2161592

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission are the original and three (3) copies of the Pre-Hearing Memorandum of International Union of Electrical Workers Local 614, in the above captioned matters.

Very truly yours,

SPEAR WILDERMAN, P.C.

BY: CHARLES T. JOYCE

CTJ/tj  
Encs.

cc: Administrative Law Judge Marlene R. Chestnut (w/encs.)  
Administrative Law Judge Christopher Pell (w/encs.)  
John W. Brown, President and Business Manager, IBEW Local Union 614 (w/encs.)  
All Interested Parties (w/encs.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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SECRETARY'S BUREAU

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

**PRE-HEARING MEMORANDUM ON BEHALF OF  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 614, AFL-CIO**

The International Brotherhood of Electrical Workers Local 614, AFL-CIO, ("Local 614" or "the Union") is the exclusive collective bargaining representative for employees of PECO Energy Company engaged in the Generation and Distribution of Electrical and Gas Service, and in the Company's Customer Service Departments. On April 12, 2010, Local 614 filed a Petition to Intervene in the above captioned matter. Pursuant to the Order of the Administrative Law Judge, the Union hereby files this Prehearing Memorandum.

A. Representative:

1. IBEW Local 614 will be represented in this matter by the following counsel:

Charles T. Joyce, Esquire  
Attorney I.D. No. 51254  
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230 S. Broad Street, Suite 1400  
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[Ctjoyce@spearwilderman.com](mailto:Ctjoyce@spearwilderman.com)

B. Discovery:

2. Local 614 pledges to work with all parties to develop a discovery schedule and to complete it as efficiently and expeditiously as possible, and fully supports the discovery schedule as developed thus far by the parties.

C. Witness:

3. Local 614 intends to introduce the testimony of John W. Brown, President and Business Manager of IBEW Local 614. Mr Brown's business address is IBEW Local Union 614, P.O. Box 32, Woodlyn, Pennsylvania 19094, and his telephone number is (610) 876-4912. Mr. Brown will testify in support of PECO's request for a rate increase, and particularly, how the increase is necessary to attract and retain a skilled workforce, and to safely maintain PECO assets to provide reliable energy service to the public.

D. Issues:

4. Local 614 supports and adopts the Statement of Issues contained in the Preconference Memorandum of PECO Energy Company.


E. Settlement:

5. Local 614 will participate, as necessary, in any and all settlement discussions between the parties to resolve amicably the issues presented by this proceeding.

Respectfully submitted,

SPEAR WILDERMAN, P.C.

BY:

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

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Dated: June 7, 2010

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SECRETARY'S BUREAU

**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 7th day of June, 2010, served a true and correct copy of the foregoing Pre-Hearing Memorandum on behalf of IBEW Local 614 upon the participants listed below, by First Class Mail:

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**CHARLES T. JOYCE**



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