

Brian C. Wauhop

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June 23, 2014

VIA EMAIL AND FIRST-CLASS MAIL


Scott J. Rubin, Esquire
333 Oak Lane
Bloomsburg, PA 17815-2036

Re: Utility Workers Union of America Branch 180 – System Local 102 and Martin P. Baronner v. Pennsylvania Electric Company (As Amended)
Docket No. C-2014-2404307

Dear Mr. Rubin:

Enclosed please find Interrogatories and Requests for Production of Documents – Set 1, numbers 1 through 25, propounded by Pennsylvania Electric Company (“Penelec”) on the Utility Workers Union of America Branch 180 – System Local 102 (“UWUA”) and Martin P. Baronner. Under separate cover, Penelec is filing Preliminary Objections to this Amended Complaint which may result in UWUA not being a party to this Complaint at the time hearing in this matter occurs. Hearing in this matter has been scheduled for August 5, 2014. Because a ruling on these Preliminary Objections is not yet available and the hearing remains scheduled, it is necessary to initiate this discovery. Thank you for your attention to this matter.

Very truly yours,



Brian C. Wauhop

BCW/tlg

cc: Rosemary Chiavetta, Secretary (*letter and certificate of service only*)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UTILITY WORKERS UNION OF AMERICA	:	
BRANCH 180 – SYSTEM LOCAL 120	:	
AND	:	
MARTIN P. BARONNER	:	Docket No. C-2014-2404307
	:	
v.	:	
	:	
PENNSYLVANIA ELECTRIC COMPANY	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via Email and First-Class Mail

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815-2036
scott.j.rubin@gmail.com

Dated this 23rd day of June, 2014.



Brian C. Wauhop, Esq.