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August 26, 2014

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

Re: Joint Application of PPL Interstate Energy
Company and PPL Electric Utilities Corporation
for All of the Necessary Authority, Approvals, and
Certificates of Public Convenience
Docket No. A-2014-2435752
Docket No. A-2014-2435833

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of Intervene of International Brotherhood of Electrical Workers, Local 1600, in the above-referenced proceeding. The document was served on all parties of record as shown on the attached Certificate of Service.

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

Sincerely,



Enclosure

cc: All parties of record
Susan D. Colwell, Administrative Law Judge

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of PPL Interstate Energy :
Company and PPL Electric Utilities Corporation :
for All of the Necessary Authority, Approvals, :
and Certificates of Public Convenience (1) for :
the Transfer of PPL Corporation's Ownership :
Interests in PPL Interstate Energy Company to :
Talen Energy Corporation, and Certain Post :
Closing Transactions Associated therewith; (2) :
for the Transfer of Certain Property Interests : Docket No. A-2014-2435752
Between PPL Electric Utilities Corporation and : Docket No. A-2014-2435833
PPL Energy Supply, LLC and its Subsidiaries in :
Conjunction with the Transfer of All of the :
Interests of PPL Energy Supply, LLC and its :
Subsidiaries to Talen Energy Corporation; (3) :
for any Modification or Amendment of :
Associated Affiliated Interest Agreements; and :
(4) for any Other Approvals Necessary to :
Complete the Contemplated Transactions :

PETITION TO INTERVENE
OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 1600

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, International Brotherhood of Electrical Workers, Local 1600 (“IBEW”), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, IBEW states as follows:

1. IBEW is the authorized collective bargain representative for more than 1,000 employees of PPL Corporation and its subsidiaries, including PPL Electric Utilities Corporation (“PPL EU”) and/or PPL Interstate Energy Company (“PPL IEC”) (PPL IEU and PPL EU will be referred to collectively as "Joint Applicants").

2. IBEW's business office is located at 1259 Grange Road, Allentown, PA.

3. IBEW will be represented in this case by, and all documents should be served upon, its attorney:

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4. Pursuant to 52 Pa. Code § 1.54(b)(3), the undersigned counsel consents to the electronic service of all documents at the e-mail address shown above.

5. On July 30, 2014, Joint Applicants filed a request for approval of the transfer of various right and assets in order to effectuate the divestiture of various electricity supply and natural gas distribution portions of their businesses. The divested assets would then be combined with and merged into a new company, that also would obtain assets and rights from an out-of-state company, to form a new company to be known as Talen Energy Corporation.

6. IBEW anticipates that issues may be raised in this proceeding that will or may affect its interests as a representative of Joint Applicants' employees. For example, and not by way of limitation, the Application discusses the Employee Matters Agreement. Application ¶ 5 and Appendix C. The Application also recognizes that because of the proposed transfer of PPL IEC's natural gas distribution business, the Commission is required to consider the impact of the proposed transaction on that company's employees and the collective bargaining unit that represents them. Application ¶ 77, citing to 66 Pa. C.S. § 2210(a)(2). In addition, the Employee Matters Agreement (Appendix C to the Application) specifically discusses certain effects of the transaction on IBEW and its

collective bargaining agreement, including the need to separate the existing agreement between two employers, as well as the necessity to negotiate different benefits or other terms and conditions of employment in certain instances. See, for example, Appendix C, § 2.5.

7. No other party represents the interests of IBEW and its members.

8. IBEW intends to actively participate in this proceeding on such matters that affect its members as employees of Joint Applicants. Such participation may include the presentation of testimony and the cross-examination of witnesses presented by Joint Applicants 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,



Scott J. Rubin (PA Sup. Ct. ID 34536)

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Counsel for IBEW Local 1600

Dated: August 26, 2014

VERIFICATION

I, Michael W. Wert, the President Financial -Secretary of the International Brotherhood of Electrical Workers, Local Union 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: August, 22, 2014



Michael W. Wert

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served this day a true copy of the foregoing document upon the parties listed below by electronic mail and U.S. mail, first-class, postage prepaid, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Harrisburg, PA 17101

Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923

Dated: August 26, 2014



Scott J. Rubin
Counsel for IBEW