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September 9, 2014

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

Re: Pa. PUC v. West Penn Power Co.
Docket No. R-2014-2428742

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of Utility Workers Union of America System Local 102 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

5. UWUA anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of West Penn's employees and retirees. For example, West Penn's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among others. In addition, the filing contains information concerning the reliability of West Penn's service, and various changes being undertaken allegedly to improve safety and reliability, that will or may have a direct effect on UWUA and its members.

6. No other party to this proceeding represents the interests of UWUA and its members.

7. UWUA intends to actively participate in this proceeding on such matters that affect its interests as a representative of its members as employees, retirees, and/or customers of West Penn. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by West Penn and other parties to this proceeding.

WHEREFORE, Utility Workers Union of America System Local 102 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



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Counsel for:

UWUA System Local 102

Dated: September 9, 2014

VERIFICATION

I, Robert Whalen, the President of Utility Workers Union of America System Local 102 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: 9/9/14

Robert T. Whalen

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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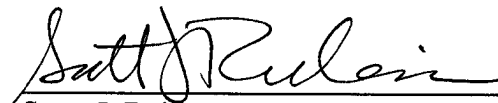
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Dated: September 9, 2014



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