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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. Metropolitan Edison Co.  
Docket No. R-2014-2428745

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of Electrical Workers Local 777 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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2014-2428745
	:	
Metropolitan Edison Company	:	

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PETITION TO INTERVENE OF  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 777

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Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, International Brotherhood of Electrical Workers Local 777 ("IBEW"), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, IBEW states as follows:

1. IBEW is the authorized bargaining unit for approximately 700 employees of Metropolitan Edison Company ("Met Ed") and its affiliates, nearly all of whom are customers of Met Ed.

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

Scott J. Rubin  
333 Oak Lane  
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Voice: 570-387-1893  
Fax: 570-387-1894  
Email: scott.j.rubin@gmail.com

3. 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.

4. On August 4, 2014, Met Ed filed a request for an increase in base rates and various riders totaling approximately \$151.9 million.

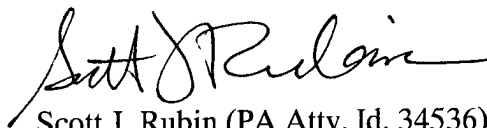
5. IBEW anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of Met Ed's employees and retirees. For example, Met Ed's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among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

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

7. IBEW 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 Met Ed. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by Met Ed and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers Local 777 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



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Email: scott.j.rubin@gmail.com

Counsel for:  
IBEW Local 777

Dated: September 9, 2014

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VERIFICATION

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I, Richard J. Drey, Jr, the Business Manager/Financial Secretary of IBEW Local 777, 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: 09-04-2014

Richard J Drey Jr

**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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Dated: September 9, 2014

  
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Scott J. Rubin  
Counsel for IBEW