

333 OAK LANE
BLOOMSBURG, PA 17815
SCOTT.J.RUBIN@GMAIL.COM

SCOTT J. RUBIN
ATTORNEY • CONSULTANT

TEL: (570) 387-1893
FAX: (570) 387-1894
CELL: (570) 850-9317

September 9, 2014

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

Re: Pa. PUC v. Pennsylvania Electric Co.
Docket No. R-2014-2428743

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of Utility Workers Union of America System Local 102, Branch Local 180, 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,

A handwritten signature in black ink, appearing to read "Scott J. Rubin". The signature is fluid and cursive, with the first name "Scott" and last name "Rubin" clearly legible.

Enclosure

cc: All parties of record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2014-2428743
	:	
Pennsylvania Electric Company	:	

PETITION TO INTERVENE OF
UTILITY WORKERS UNION OF AMERICA
SYSTEM LOCAL 102, BRANCH LOCAL 180

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, Utility Workers Union of America System Local 102, Branch Local 180 ("UWUA"), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, UWUA states as follows:

1. UWUA is the authorized bargaining unit for more than 100 employees of Pennsylvania Electric Company ("Penelec"), nearly all of whom are customers of Penelec.
2. UWUA will be represented in this case by, and all documents should be served upon, its attorney:

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815-2036
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, Penelec filed a request for an increase in base rates and various riders totaling approximately \$119.8 million.

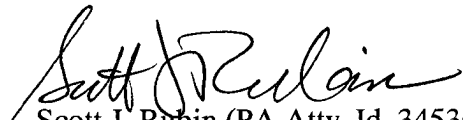
5. UWUA anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of Penelec's employees and retirees. For example, Penelec's filing includes claims regarding employment levels, employee wages and benefits expenses, and pension funding, among others. In addition, the filing contains information concerning the reliability of Penelec'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 Penelec. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by Penelec and other parties to this proceeding.

WHEREFORE, Utility Workers Union of America System Local 102, Branch Local 180 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,


Scott J. Rubin (PA Atty. Id. 34536)
333 Oak Lane
Bloomsburg, PA 17815-2036
Voice: 570-387-1893
Fax: 570-387-1894
Email: scott.j.rubin@gmail.com

Counsel for:
UWUA System Local 102, Branch Local 180

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).

Tori Giesler / Lauren Lepkoski
FirstEnergy Service Company
2800 Pottsville Pike
Reading, PA 19612
tgiesler@firstenergy.com
llepkoski@firstenergy.com

Allison Kaster
Bureau of Investigation & Enforcement
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

Darryl Lawrence / Kristine Robinson
Brandon Pierce / Lauren Burge
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
dlawrence@paoca.org / krobinson@paoca.org
bpierce@paoca.org / lburge@paoca.org

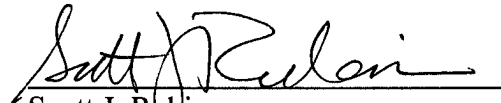
Thomas Gadsen / Anthony DeCusatis
Catherine Vasudevan
Morgan Lewis & Bockius LLP
1701 Market St.
Philadelphia, PA 19103-2921
tgadsden@morganlewis.com
adecusatis@morganlewis.com
cvasudevan@morganlewis.com

Daniel Asmus
Office of Small Business Advocate
300 North Second St., Suite 1102
Harrisburg, PA 17101
dasmus@pa.gov

Joan Group
1040 Rosewood Dr.
Altoona, PA 16601

Karla Lamison
4238 Guitonville Rd.
Marienville, PA 16239
kaitax@verizon.net

Dated: September 9, 2014



Scott J. Rubin
Counsel for UWUA