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October 6, 2014

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

Re: Pa. PUC v. West Penn Power Company
Pa. PUC v. Pennsylvania Electric Company
Pa. PUC v. Pennsylvania Power Company
Pa. PUC v. Metropolitan Edison Company
Docket Nos. R-2014-2428742, R-2014-2428743,
R-2014-2428744, and R-2014-2428745

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum of Labor Intervenors in the above-referenced proceedings. 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
Dennis J. Buckley, Administrative Law Judge

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	
	:	
West Penn Power Company	:	Docket No. R-2014-2428742
Pennsylvania Electric Company	:	Docket No. R-2014-2428743
Pennsylvania Power Company	:	Docket No. R-2014-2428744
Metropolitan Edison Company	:	Docket No. R-2014-2428745

PREHEARING MEMORANDUM
OF
LABOR INTERVENORS

In accordance with the Administrative Law Judge's Prehearing Conference Order dated September 30, 2014, and 52 Pa. Code § 5.222(d)(1), International Brotherhood of Electrical Workers ("IBEW") Local 459, IBEW Local 777, and Utility Workers Union of America ("UWUA") Local 102 (collectively "Labor Intervenors") hereby file this Prehearing Memorandum and provide the following information to the Administrative Law Judge and the active parties to this proceeding.

Procedural History: On September 9, 2014, Labor Intervenors filed the following Petitions to Intervene in these cases:

- IBEW Local 459 petitioned to intervene in the Pennsylvania Electric Company rate case, Docket No. R-2014-2428743;
- IBEW Local 777 petitioned to intervene in the Metropolitan Edison Company rate case, Docket No. R-2014-2428745;

- UWUA Local 102 petitioned to intervene in the Pennsylvania Electric Company rate case, Docket No. R-2014-2428743; and
- UWUA Local 102 petitioned to intervene in the West Penn Power Company rate case, Docket No. R-2014-2428742.

Issues: Labor Intervenors have reviewed the utilities' filings and testimony, and are waiting to receive the responses to discovery requests. At this stage, Labor Intervenors have not identified any specific issues on which they would file direct testimony. Labor Intervenors expect to focus their attention on issues that could have a direct and substantial impact on their members. This will include, but not be limited to, employee-related issues (such as employment levels, productivity, benefit costs, and the status of the utilities' pension funds), as well as issues related to the safety and reliability of service.

Labor Intervenors have not determined the extent to which they will need to participate in order to represent the interests of their members, but they will pursue these issues, as necessary, through discovery, cross-examination, direct or rebuttal testimony, and the filing of briefs and other pleadings, as required to protect their interests.

Witnesses: Labor Intervenors have not identified the need for, or identity of, any witnesses at this time. If it is determined that one or more witnesses will be necessary, Labor Intervenors will notify the Administrative Law Judge and parties as soon as the identities of any such witnesses are known.

Service List: Labor Intervenors request that their entry on the service list should be for its counsel, as follows:

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Pursuant to 52 Pa. Code § 1.54(b)(3), Labor Intervenors consent to the electronic service of all documents at the e-mail address shown above.

Schedule: Counsel for Labor Intervenors have been working with counsel for other parties to develop a schedule for this proceeding. It is hoped that a consensus schedule will be provided to the Administrative Law Judge at or before the prehearing conference.

Respectfully submitted,



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Counsel for IBEW Local 459,
IBEW Local 777, and UWUA Local 102

Dated: October 6, 2014

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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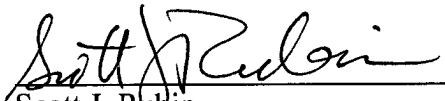
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