

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

June 28, 2016

Cynthia Williams Fordham, ALJ
Pa. Public Utility Commission
801 Market St., Suite 4063
Philadelphia, PA 19107

Re: International Brotherhood of Electrical Workers,
Local 614, v. PECO Energy Company (Electric)
Docket No. C-2016-2525801

Dear ALJ Fordham:

This letter will supplement the Prehearing Memorandum of International Brotherhood of Electrical Workers Local 614 (IBEW) in the above-referenced matter. In its Prehearing Memorandum, IBEW identified Emil Meyer, the President and Business Manager of IBEW, as its primary witness. IBEW also indicated that it might be necessary to call additional witnesses "who have direct, first-hand knowledge of specific substandard work performed by contractors on PECO's distribution system." IBEW Prehearing Memorandum, page 3. After reviewing the extensive documentation provided in discovery, IBEW intends to provide written direct testimony from the following witnesses in addition to Mr. Meyer:

Frederick F. Baumeister, 1114 Sherbrooke Drive, West Chester
Dwayne M. Clauser, 307 Sycamore Rd, Douglassville
Brendan J. Clemmer, 276 Nockamixon Road, Kintnersville
John M. Gonsorick, 7 Lenape Drive, Morgantown
Joseph. Guiliano, 308 Penns Lane, Douglassville
James C. McGill, 2 Katie Way, West Chester
John G. McGill, 1144 Lone Eagle Road, Coatesville
Kevin E. Scherneck, 135 S Buckthorn Ave, Langhorne
Jeffrey E. Slanker, 125 Zoller Drive, Phoenixville

Each witness is an employee of PECO and member of IBEW who has first-hand knowledge of one or more specific incidents in which a contractor hired by PECO failed to perform work in a safe manner, and in which PECO failed to adequately supervise and/or inspect the work.

All testimony will be written and will be pre-filed on June 30, 2016, as scheduled.

Sincerely,



cc: Rosemary Chiavetta, Secretary
All parties per certificate of service

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).

Michael S. Swerling
PECO Energy Company
2301 Market St., S23-1
Philadelphia, PA 19101-8699
michael.swerling@exeloncorp.com

Karl A. Fritton
Reed Smith LLP
3 Logan Square
1717 Arch St., Suite 3100
Philadelphia, PA 19103
kfritton@reedsmith.com

Darryl Lawrence
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
dlawrence@paoca.org

Dated: June 28, 2016



Scott J. Rubin, Counsel for IBEW Local 614