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April 25, 2024

VIA E-FILE

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: FirstEnergy Pennsylvania Electric Company
Docket No. R-2024-3047068

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of Electrical Workers Local 459 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,

Brian T. Kadlubek

Enclosure

cc: All parties

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3047068
FirstEnergy Pennsylvania Electric Company	:	

PETITION TO INTERVENE
OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS, LOCAL 459

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, the International Brotherhood of Electrical Workers, Local 459 (“IBEW”), hereby petitions to intervene in the above-captioned proceeding. In support of this Petition, IBEW states as follows:

1. IBEW is the authorized collective bargaining representative for approximately 442 employees of FirstEnergy Pennsylvania Electric Company (“Company”). IBEW maintains an office located at 408 Broad Street, Johnstown, PA 15906, where it is an electric customer of the Company.

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

Brian T. Kadlubek (PA Atty. Id. 68177)
Pullman Center
112 Hollywood Drive, Suite 101
Butler, PA 16001
Phone: 724-462-5347
Email: btkadlubek@lawgol.com

3. Pursuant to 52 Pa. Code § 1.54(b)(3), counsel consents to the electronic service of all documents at the e-mail addresses shown above.

4. On April 2, 2024, the Company filed a request for a base rate increase of approximately \$502 million.

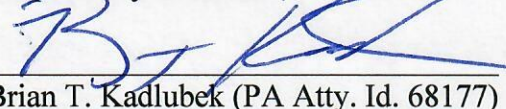
5. IBEW anticipates numerous issues being raised in this proceeding that will or may affect its interests as a representative of the Company's employees and retirees and as a customer of the Company. For example, the Company's filing includes claims regarding employment levels, employee wages and benefits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

WHEREFORE, International Brotherhood of Electrical Workers, Local 459 respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,


Brian T. Kadlubek (PA Atty. Id. 68177)
Pullman Center
112 Hollywood Drive, Suite 101
Butler, PA 16001
Phone: 724-462-5347
Email: btkadlubek@lawgol.com

Date: April 25, 2024

Counsel for IBEW Local 459

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2024-3047068
 FirstEnergy Pennsylvania Electric Company :

VERIFICATION

I, Barry Hixson, the Business Manager of International Brotherhood of Electrical Workers, Local 459, 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: 04-24-2024



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2024-3047068
 FirstEnergy Pennsylvania Electric Company :

Certificate of Service

I hereby certify that I have this day serviced copies of the **Petition to Intervene** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA Email only

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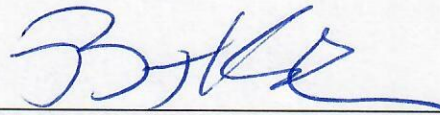
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Respectfully submitted,



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Date: April 25, 2024

Counsel for IBEW Local 459