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August 7, 2014

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

Re: Petition of PPL Electric Utilities Corporation for
Approval of Its Smart Meter Technology
Procurement and Installation Plan
Docket No. M-2014-2430781

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of Electrical Workers, Local 1600, 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
Susan D. Colwell, Administrative Law Judge

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities :
Corporation for Approval of Its Smart :
Meter Technology Procurement and : Docket No. M-2014-2430781
Installation Plan :
:

PETITION TO INTERVENE
OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 1600

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, International Brotherhood of Electrical Workers, Local 1600 (“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 more than 1,000 employees of PPL Electric Utilities Corporation (“PPL”) and is also a customer of PPL at IBEW’s office located at 1259 Grange Road, Allentown, PA 18106.

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

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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 June 30, 2014, PPL filed a request for approval of its Smart Meter Technology Procurement and Installation Plan ("Plan").

5. IBEW anticipates that issues may be raised in this proceeding that will or may affect its interests as a representative of PPL's employees and as a customer of PPL. For example, the filing notes the importance of informing PPL employees and IBEW of the effects of the Plan on employees and customer service (see, e.g., Petition ¶¶ 75-76; PPL Exh. 1, pp. 60-61, and PPL St. 4, p. 19). The filing also discusses specific concerns about the availability of resources, including adequately trained employees and contractors (see, e.g., PPL Exh. 1, p. 46).

6. No other party 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 PPL and the interests of its members as employees of PPL. Such participation may include the presentation of testimony and the cross-examination of witnesses presented by PPL and other parties to this proceeding.

WHEREFORE, International Brotherhood of Electrical Workers, Local 1600, respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



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Counsel for IBEW Local 1600

Dated: August 7, 2014

VERIFICATION

I, Jane F. Biever, the Treasurer of International Brotherhood of Electrical Workers, Local 1600, 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: _____

8/7/14



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: August 7, 2014



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