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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 Prehearing Memorandum of 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 :
:

PREHEARING MEMORANDUM
OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 1600

In accordance with the Administrative Law Judge's Prehearing Order dated July 8, 2014, and 52 Pa. Code § 5.222(d)(1), International Brotherhood of Electrical Workers, Local 1600 ("IBEW"), hereby files this Prehearing Memorandum and provides the following information to the Administrative Law Judge and the parties to this proceeding.

Procedural History: IBEW filed a Petition to Intervene on August 7, 2014.

Issues: IBEW has reviewed the petition, Smart Meter Technology Procurement and Installation Plan ("Plan"), and direct testimony filed by PPL Electric Utilities Corp. ("PPL"). At this stage, IBEW has not identified any specific issues on which it would file direct testimony. IBEW will focus its attention on issues that could have a direct and substantial impact on its members. IBEW notes that PPL's documents recognize the importance of communicating with IBEW and its members about the Plan, as well as the importance of ensuring the availability of adequately trained employees and contractors to implement the Plan.

Witnesses: IBEW has not identified the need for, or identity of, any witnesses at this time. If it is determined that a witness is necessary, IBEW will notify the Administrative Law Judge and parties as soon as that person is identified.

Service List: IBEW requests that its entry on the service list should be for its counsel, as follows:

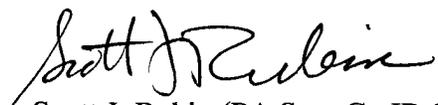
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Pursuant to 52 Pa. Code § 1.54(b)(3), IBEW consents to the electronic service of all documents at the e-mail address shown above.

Schedule: Counsel for IBEW will work with counsel for other parties to develop a schedule for this proceeding.

Discovery Rules: IBEW is not requesting any modifications in the Commission's discovery rules.

Respectfully submitted,



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Counsel for IBEW Local 1600

Dated: August 7, 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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Dated: August 7, 2014



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