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June 2, 2010

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

Re: Joint Application of West Penn Power Company
d/b/a Allegheny Power, Trans-Allegheny Interstate
Line Company and FirstEnergy Corp. for a
Certificate of Public Convenience under Section
1102(a)(3) of the Public Utility Code approving a
change in control of West Penn Power Company
and Trans-Allegheny Interstate Line Company
Docket No. A-2010-2176520
Docket No. A-2010-2176732

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of International Brotherhood of
Electrical Workers in the above-referenced proceeding.

The document was filed electronically with the Commission on this date.

Sincerely,


Enclosure

cc: per Certificate of Service
Wayne Weisman, Administrative Law Judge
Mary D. Long, Administrative Law Judge

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of West Penn Power	:	
Company d/b/a Allegheny Power, Trans-	:	
Allegheny Interstate Line Company and	:	
FirstEnergy Corp. for a Certificate of Public	:	Docket No. A-2010-2176520
Convenience under Section 1102(a)(3) of the	:	Docket No. A-2010-2176732
Public Utility Code approving a change in	:	
control of West Penn Power Company and	:	
Trans-Allegheny Interstate Line Company	:	

PETITION TO INTERVENE
OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

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

1. IBEW, by and through its various local unions, is the authorized bargaining unit for approximately 3,900 employees of FirstEnergy Corp. (“FirstEnergy”) and various subsidiaries thereof. More than 2,000 of those IBEW members work for FirstEnergy in Pennsylvania. These include members of IBEW Locals 459 and 777 who work for FirstEnergy’s Pennsylvania Electric Company (“Penelec”) and Metropolitan Edison Company (“Met Ed”) subsidiaries, respectively, among others.

2. This proceeding concerns a proposed merger between FirstEnergy (the parent company of Penelec and Met Ed) and Allegheny Energy Inc. (“Allegheny”).

3. As explained by the Joint Applicants, the proposed merger would affect the operations of FirstEnergy and its subsidiaries, including Met Ed and Penelec, in addition

to affecting Allegheny and its subsidiaries. For example, Anthony Alexander, the President and Chief Executive Officer of FirstEnergy, states that Met Ed and Penelec are expected to share “best practices” with Allegheny, and achieve savings from the proposed transaction. Joint Applicants Statement 1, p. 12. He also states that FirstEnergy has “reduced and slowed its employee hiring” in anticipation of the merger. Id., p. 15. In addition, he states that FirstEnergy will not have “net reductions due to voluntary attrition as a result of the merger integration process” in its workforce at Met Ed and Penelec. Id., p. 14.

4. IBEW desires to participate in this proceeding to ensure that the interests of its members, as employees and customers of FirstEnergy, are fully protected and represented in this matter.

5. No other party to this proceeding represents the interests of IBEW and its members.

6. IBEW submits that there are numerous aspects of this transaction that should be fully investigated by the Commission, including but not limited to, the impact of the transaction on FirstEnergy’s operations in Pennsylvania (including the safety and reliability of service); impacts on the employees of FirstEnergy, including any changes in employment levels, pension and other post-retirement benefits (and the assets necessary to ensure the provision of those benefits); and other potential employment-related impacts.

7. IBEW intends to actively participate in this proceeding on these and such other matters that affect its interests and the interests of its members. Such participation

may include conducting discovery, presenting testimony, cross-examining witnesses, and filing briefs and other pleadings.

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

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9. Counsel consents to the service of documents by electronic mail at the email address listed above, as provided in 52 Pa. Code § 1.54(b)(3).

WHEREFORE, IBEW respectfully requests the right to intervene as an active party in this proceeding.

Respectfully submitted,



Scott J. Rubin, Esq.
Pa. Supreme Court ID: 34536
333 Oak Lane
Bloomsburg, PA 17815

Counsel for:
International Brotherhood of Electrical
Workers

Dated: June 2, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing upon the following parties to this proceeding by electronic mail, or first class mail (where an e-mail address is not listed).

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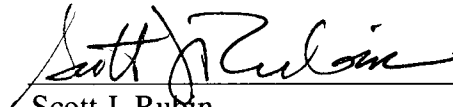
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Scott J. Rubin
Counsel for IBEW

Dated: June 2, 2010

VERIFICATION

I, Donald J. Hoak , the Business Manager of Local 459 IBEW, 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: June 2, 2010

