

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of West Penn Power	:	
Company d/b/a Allegheny Power, Trans-	:	
Allegheny Interstate Line Company and	:	A-2010-2176520
FirstEnergy Corp. for a Certificate of	:	A-2010-2176732
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	:	

STATEMENT IN SUPPORT OF JOINT PARTIAL SETTLEMENT

On June 14, 2010, Utility Workers Union of America, AFL-CIO (“UWUA”), and UWUA System Local No. 102 (collectively, “UWUA Intervenors”), filed a Petition to Intervene in this proceeding. In their Petition, UWUA Intervenors stated (at 3) that they:

should be permitted to intervene because the proposed merger will have a substantial, obvious, and direct effect on the livelihoods and working conditions of the merging companies’ workforce. The UWUA Intervenors seek leave to participate to ensure that evidence concerning the merger’s impacts on the West Penn workforce is introduced and considered in the determination of whether the merger should be approved as in the public interest.

UWUA Intervenors did not file testimony or participate in the hearings in this matter.

UWUA Intervenors support approval of the Joint Petition for Partial Settlement (“Settlement”) as in the public interest for the reasons stated therein, as well as for the following reasons:

- UWUA System Local 102 recently completed negotiations with Allegheny Energy on a contract extension that was ratified by our members and will run through April 2013. That contract covers all of the UWUA System Local 102-represented employees who work at the Allegheny Energy operating companies. There is language in the contract extension providing that if the

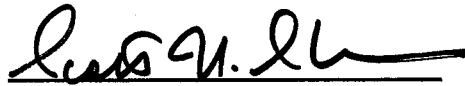
proposed merger is approved, FirstEnergy will assume the obligations of the new contract.

- Given economic conditions, related pressures on working families, and the challenges facing utility companies, we believe that it is particularly important – for both employees and customers – that we continue to have a productive working relationship with the company that owns Allegheny Power. UWUA Intervenors believe that the merged company will be receptive to such a relationship.

With respect to the questions set forth in the June 3, 2010, letter from the Commission Secretary, we note that Secretary Question Nos. 1 and 2, which concern employment and service reliability issues, are addressed in Settlement Paragraphs 49-51, 58 (4th bullet point) and 59 (3rd bullet point). It is our understanding that in implementing these provisions, the merged company will assess staffing levels and implement changes as needed. We have not addressed--and are therefore unable to take a position with respect to--the remaining questions in the Secretary's letter.

WHEREFORE, UWUA Intervenors respectfully request that the Administrative Law Judges and the Commission approve the terms and conditions of the proposed Settlement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott H. Strauss", written over a horizontal line.

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October 27, 2010

CERTIFICATE OF SERVICE

I, Scott H. Strauss, counsel for UWUA Intervenors, hereby certify that on the 27th day of October, 2010, I caused a copy of the foregoing Motion to Intervene to be served upon all parties of record by postage prepaid, first-class, U.S. mail.

A handwritten signature in black ink, appearing to read 'Scott H. Strauss', written over a horizontal line.

Scott H. Strauss