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May 3, 2018

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

Re: Pa. PUC v. PECO Energy Co. - Electric Division
Docket No. R-2018-3000164

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum of International Brotherhood of Electrical Workers Local 614, 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: Christopher P. Pell, Deputy Chief ALJ
F. Joseph Brady, ALJ
All parties of record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3000164
	:	
PECO Energy Company - Electric Division	:	

PREHEARING MEMORANDUM
OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 614

In accordance with the Administrative Law Judges' Prehearing Conference Order dated April 20, 2018, and 52 Pa. Code § 5.222(d)(1), International Brotherhood of Electrical Workers, Local 614 ("IBEW"), hereby files this Prehearing Memorandum and provides the following information to the Administrative Law Judges and the active parties to this proceeding.

Procedural History: IBEW filed a Petition to Intervene on April 17, 2018.

Issues: IBEW has been reviewing the exhibits and testimony filed by PECO Energy Company ("PECO"). 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. This will include, but not be limited to, employee-related issues (such as employment levels, productivity, benefit costs, and the status of PECO's pension fund), as well as issues related to the safety and reliability of service. IBEW has not determined the extent to which it will need to participate in order to represent the interests of its members, but it will pursue these

issues, as necessary, through discovery, cross-examination, direct and rebuttal testimony, and the filing of briefs and other pleadings, as required to protect its interests.

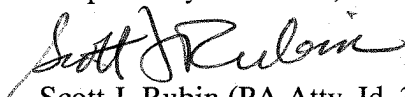
Witnesses: IBEW has not identified the need for, or identity of, any witnesses at this time. If it is determined that a witness is necessary, IBEW will notify the Administrative Law Judges and parties as soon as that person is identified.

Discovery: IBEW has initiated discovery by serving its first set of interrogatories and requests for production of documents. Responses are not yet due to those requests.

Representation: IBEW requests that its entries on the service list should be for both of its attorneys, listed below. Mr. Rubin will attend the Prehearing Conference at the Harrisburg location and will speak for IBEW. Mr. Joyce will not attend the Prehearing Conference. Pursuant to 52 Pa. Code § 1.54(b)(3), IBEW consents to the electronic service of all documents at the e-mail addresses shown below.

Schedule: Counsel for IBEW will work with counsel for other parties and the Administrative Law Judges to develop a schedule for this proceeding.

Respectfully submitted,



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Counsel for IBEW Local 614

Dated: May 3, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of **Prehearing Memorandum of International Brotherhood of Electrical Workers, Local 614** upon the following parties by electronic mail (where an email address is shown) and first class mail.

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5/3/2018
Date



Scott J. Rubin, Counsel for IBEW Local 614