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BEFORE THE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD  
Ivan W. Smith, Esquire, Chairman  
Dr. Walter H. Jordan, Member  
Dr. Linda W. Little, Member



Served 9/11/79

In the Matter of :  
:  
METROPOLITAN EDISON COMPANY :  
:  
(Three Mile Island Nuclear :  
Station, Unit No. 1) :

Docket No. 50-289

POOR ORIGINAL

PETITION FOR LEAVE TO PARTICIPATE ON BEHALF OF  
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

The Pennsylvania Public Utility Commission (the "Petitioner"), through its attorneys, hereby petitions for leave to participate in the above-captioned matter and in support of its petition avers as follows:

116/178

1. The Petitioner is an independent administrative agency with the exclusive and plenary authority, under the laws of the Commonwealth of Pennsylvania, to regulate the rates, service and facilities of public utilities providing public utility service in Pennsylvania. 66 Pa. C.S. §§101, et seq.

2. The Petitioner is charged with the enforcement of the Public Utility Code of Pennsylvania, 66 Pa. C.S. §§101, et seq., which mandates safe, adequate and reliable public utility service at just and reasonable rates.

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3. Metropolitan Edison Company ("Metropolitan Edison")

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is a public utility which provides electric utility service in Pennsylvania subject to the jurisdiction of the Petitioner. Metropolitan Edison is a licensee of the Nuclear Regulatory Commission holding Facility Operating License No. DPR-50 which authorizes the operation of Three Mile Island Nuclear Station, Unit No. 1 ("TMI-1").

4. The Petitioner hereby seeks to participate in the above-captioned proceeding as an agency of the Commonwealth of Pennsylvania pursuant to 10 C.F.R. §2.715(c).

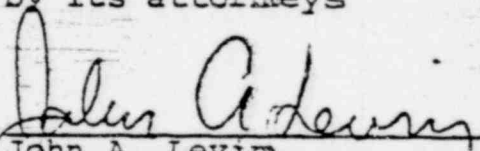
WHEREFORE, the Pennsylvania Public Utility Commission respectfully requests that it be permitted to participate in this proceeding.

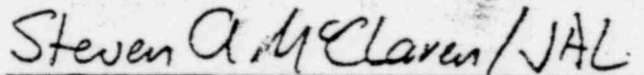
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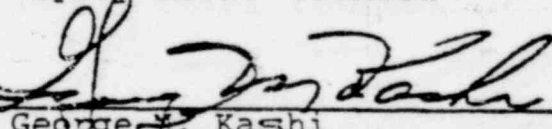
Respectfully submitted,

Pennsylvania Public Utility  
Commission

by its attorneys

  
John A. Levim  
Assistant Counsel

  
Steven A. McClaren  
Deputy Chief Counsel

  
George S. Kashi  
Chief Counsel

Date: September 7, 1979

P.O. Box 3265  
Harrisburg, PA 17120

(717) 733-3190

1167-179

BEFORE THE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD  
Ivan W. Smith, Esquire, Chairman  
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In the Matter of  
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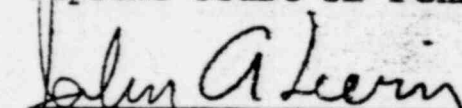
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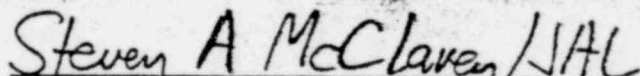
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NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorneys herewith enter an appearance in the captioned matter on behalf of the Pennsylvania Public Utility Commission. In accordance with §2.713(a), 10 C.F.R. Part 2, the following information is provided:

Name	John A. Levin
Address	Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17120
Telephone	Area Code 717-783-3190
Admissions	Supreme Court of Pennsylvania

  
John A. Levin  
Assistant Counsel

  
Steven A. McClaren  
Deputy Chief Counsel

  
George M. Kashi  
Chief Counsel

DATED AT HARRISBURG, PA  
THIS 7<sup>th</sup> DAY OF SEPTEMBER, 1979

1167.180

BEFORE THE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD  
Ivan W. Smith, Esquire, Chairman  
Dr. Walter H. Jordan, Member  
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In the Matter of  
METROPOLITAN EDISON COMPANY  
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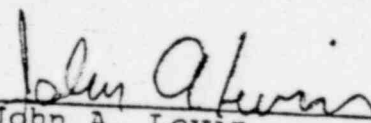
CERTIFICATE OF SERVICE

I, John A. Levin, hereby certify that I have this 7<sup>th</sup>  
day of September, 1979, served copies of the foregoing  
Petition For Leave to Participate on each of the following  
persons, by first class mail:

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Chief, Docketing and Service  
Section

Executive Legal Director  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

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