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LOCAL 270

UTILITY WORKERS UNION OF AMERICA

AFFILIATED WITH THE AFL-CIO

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October 23, 1998

REC'D BY SECY

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Dr. Shirley Jackson
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Dear Dr. Jackson:

Local 270, of the Utility Workers Union of America, AFL-CIO, is the exclusive bargaining representative in all matters pertaining to wages, hours, working and all other conditions of employment for all Operating, Maintenance and Construction employees.

Through the Internet and local newspapers, we have heard that FirstEnergy and Duquesne Light Company are going to transfer generating assets, and Duquesne plans to auction off their assets. These transfers of assets include our members at the Perry Power Plant and the Avon Lake Plant. The assets that are to be auctioned will include our members at the Avon Lake Plant. We also understand that transmission assets are being transferred into a new subsidiary called America Transmission Systems Inc.

In the filing with the Securities and Exchange Commission, we understand that in regard to labor, the parties will cooperate to resolve labor-related matters, including, with respect to Union contracts, workforce levels, severance, and employee benefits, in a manner that treats employees fairly and equitably apportions any related costs between the parties. The definitive agreements for the Generation exchange shall clearly define and equitably apportion the rights and obligations of the parties regarding these matters.

One of our concerns is how the Duquesne Light Company plans on resolving this issue? Local 270 and FirstEnergy are currently involved in several legal battles pertaining to the Company's illegal implementation of their terms and conditions of employment. We have filed charges with the National Labor Relations Board seeking 10(j) injunction relief. We have a suit filed in Federal Court pertaining to labor issues and many of our illegally laid-off members have sought legal counsel to address their individual concerns.

Another one of our concerns is how the sale of this plant will affect the service in Northeast Ohio? Local 270, along with our National Union, has been active on the deregulation front. This area suffered a shortage of power this summer and our fear is that this could add to the problem.

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DFOI per: Doug Pickett
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Dr. Shirley Jackson
U.S. Nuclear Regulatory Commission
October 23, 1998

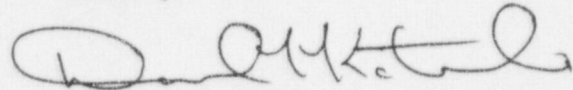
How will the transfer of transmission assets affect service in this area?

What investigation or authority is the U.S. Nuclear Regulatory Commission conducting to ensure that our members are going to be treated fairly as they claim?

What investigation or authority is the U.S. Regulatory Commission conducting to ensure the service reliability in the affected area?

We would greatly appreciate any and all information you could supply to us pertaining to these matters.

Sincerely,



David T. Kotecki
President
Local 270, U.W.U.A.

DTK/asq opeiu 1794

cc: **Willard Holland**

David D. Marshall
Duquesne Light Company