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October 6, 1997

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John S. Moot, Esq.  
Skadden, Arps, Slate, Meagher & Flom, LLP  
1440 New York Avenue, N.W.  
Washington, DC 20005

VIA FAX AND  
FIRST CLASS MAIL

**Re: Application of Duquesne Light Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code; Docket No. R-00974104**

Dear Mr. Moot:

Please find enclosed two (2) copies of the Duquesne Industrial Intervenors' Interrogatories Set I to Duquesne Light Company in the above-referenced proceeding. Please send one copy of your responses, all disks and attachments to the undersigned and one copy of your responses, all disks and attachments to our consultant :

Mr. Stephen J. Baron  
J. Kennedy and Associates, Inc.  
35 Glenlake Parkway, Suite 475  
Atlanta, GA 30328

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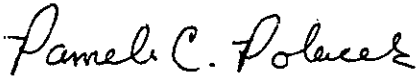
Please provide responses to all interrogatories on an expedited basis. Please endeavor to forward responses as they are completed, rather than waiting until the responses to the full set are completed.

**John S. Moot, Esq**  
**October 6, 1997**  
**Page 2**

Please communicate any objections or questions that you may have regarding these interrogatories as quickly as possible. Copies of these interrogatories are being served on all parties consistent with the attached Certificate of Service. Thank you for your attention to this matter.

Very truly yours,

McNEES, WALLACE & NURICK

By   
James P. Dougherty  
Pamela C. Polacek

JPD:mas

Enclosures

c: ~~Certificate of Service~~

✓ James J. McNulty, Acting Secretary (Transmittal Letter and Certificate of Service Only)

K:\126\02497.25\MOOT.LTR

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October 7, 1997

*Via Facsimile and First Class Mail*

Honorable John H. Corbett, Jr.  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
1103 Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, PA 15222

KJR

Re: *Application of Duquesne Light Company  
for Approval of Restructuring Plan  
Docket No. R-00974104*

Dear Judge Corbett:

Based upon the exchange of correspondence between Duquesne Light Company and Hospital Shared Services ("HSS") that occurred yesterday, October 6, 1997, HSS memorializes the withdrawal of its motion to compel of September 26, 1997 regarding Interrogatory No. 13. HSS appreciates the time and effort the Presiding Judge dedicated to the issue.

Respectfully submitted,

*Mark F. Sundback*

Mark F. Sundback  
Attorney for Hospital Shared Services  
and Administrative Resources, Inc.

cc: James J. McNulty, Prothonotary  
John S. Moot, Esq.

WAS01:42923.1

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OCT 20 1997

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October 9, 1997

KJR

John S. Moot, Esq.  
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Washington, DC 20005

Re: **Application of Duquesne Light Company for Approval of its Restructuring Plan  
Under Section 2806 of the Public Utility Code; Docket No. R-00974104**

Dear Mr. Moot:

Please find enclosed two (2) copies of the Duquesne Industrial Intervenors' Interrogatories Set II to Duquesne Light Company in the above-referenced proceeding. Please send one copy of your responses, all disks and attachments to the undersigned and one copy of your responses, all disks and attachments to our consultant :

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**John S. Moot, Esq**

**October 9, 1997**


**Page 2**

Please communicate any objections or questions that you may have regarding these interrogatories as quickly as possible. Copies of these interrogatories are being served on all parties consistent with the attached Certificate of Service. Thank you for your attention to this matter.

Very truly yours,

McNEES, WALLACE & NURICK

By



James P. Dougherty

Pamela C. Polacek

JPD:mas

Enclosures

c: Certificate of Service

✓ James J. McNulty, Acting Secretary (Transmittal Letter and Certificate of Service Only)

K:\126\02497.25\Moot2.ltr

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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OCT 14 1997

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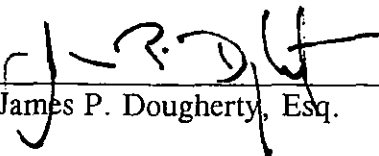
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Harrisburg, PA 17108-1166

  
James P. Dougherty, Esq.

Dated this 9th day of October, 1997, in Harrisburg, Pennsylvania.

LAW OFFICES OF  
STEVENS & LEE  
A PROFESSIONAL CORPORATION

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064

PLEASE RESPOND TO HARRISBURG

October 9, 1997

James J. McNulty  
Prothonotary/Acting Secretary  
PA Public Utility Commission  
P.O. Box 3265  
North Office Building  
Harrisburg, PA 17105-3265

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Re: Application of Duquesne Light Company for Approval of Restructuring Plan under Section 2806 of the Public Utility Code, Docket No. R-0097404

R-974104

Dear Prothonotary McNulty:

Please find enclosed an original and three copies of the Notice of Appearance of the undersigned counsel for filing on behalf of the Pennsylvania Retailers Association in the above captioned proceeding. As indicated by the attached Certificate of Service, the presiding Administrative Law Judge and all parties of record have been served a copy hereof. All parties are requested to modify their records to reflect this change.

Should you have any questions or comments, please feel free to contact my office.

Sincerely,

STEVENS & LEE

*Kenneth Zielonis*  
Kenneth Zielonis

/dle  
Attachment

cc: B. Rider

6

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

012065

Application of Duquesne Light :  
Company for Approval of : Docket No. R-0097404  
Restructuring Plan Under Section :  
2806 of the Public Utility Code :

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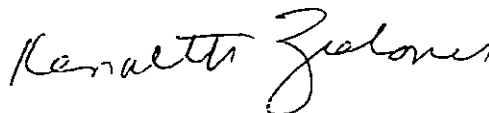
NOTICE OF APPEARANCE

Please enter my appearance in the above captioned proceeding on behalf of the Pennsylvania Retailers Association. I am authorized to accept service on behalf of said participant in this matter. On the basis of this notice, I request a copy of each document hereafter issued by the Commission in this matter.

DOCUMENT  
FOLDER

Respectfully submitted,

STEVENS & LEE



Kenneth Zielonis, Esq.  
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(717) 234-1250  
(717) 234-1939 Fax

Dated: October 9, 1997

Attorneys for the Pennsylvania  
Retailers Association

**IN THE COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 9th day of October, 1997, I have served true and correct copies of the foregoing document upon the persons set forth below by First Class Mail, postage prepaid or by hand-delivery (unless service is otherwise indicated), in accordance with 52 Pa. Code Section 1.54:

Hon. John H. Corbett, Jr.  
Administrative Law Judge  
Office of Administrative Law  
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Pa Public Utility Commission  
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October 9, 1997

*Via Facsimile and First Class Mail*

John S. Moot, Esquire  
Skadden, Arps, Slate, Meagher & Flom L.L.P.  
1440 New York Avenue, N.W.  
Washington, D.C. 20005-2111

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OCT 15 1997

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PROTHONOTARY'S OFFICE

97 OCT 14 AM 10:14

Re: *Application of Duquesne Light Company  
for Approval of Restructuring Plan  
Docket No. R-00974104*

Dear John:

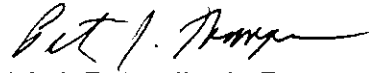
Attached please find the Second Set of Interrogatories of Hospital Shared Services ("HSS") and Administrative Resources, Inc. ("ARI"). In addition to serving responses to these interrogatories upon undersigned counsel, please also have the responses, including copies of all documents and diskettes, delivered to the following individual:

Robert B. Weisenmiller, Ph.D.  
MRW & Associates  
1999 Harrison Street, Suite 1440  
Oakland, CA 94612-3517

On a related matter, since counsel for HSS/ARI have forwarded to you executed certificates of authorized representatives on October 7, 1997, we anticipate that you will promptly furnish us by noon Tuesday, October 14, 1997, with any outstanding material covered by the Protective Order in addition to that which we received today.

John S. Moot, Esquire  
October 9, 1997  
Page 2

Very truly yours,



Mark F. Sundback, Esq.

Kenneth L. Wiseman, Esq.

Peter J. Thompson, Esq.

Counsel for Hospital Shared Services and  
Administrative Resources, Inc.

cc: All Active Participants (*via First Class Mail*)  
Prothonotary (*w/o attachments*)

DJH

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OCT 10 1997

Mark F. Sundback, Esq.  
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PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

Re: Duquesne Light Company, Docket No.  
R-00974104 -- Objections to HSS/ARI  
Second Set of Discovery Requests

Dear Mark:

Duquesne Light Company ("Duquesne") submits its objections to the second set of discovery requests of Hospital Shared Services and Administrative Services, Inc. ("HSS/ARI"). Duquesne may serve additional objections as they become apparent.

Before detailing each objection, I convey Duquesne's regret that you have again submitted several document production requests that are so poorly focused and unsophisticated that they request virtually every document in the company's files addressing a particular matter. A good example is Interrogatory No. 21, which requests "all documents that discuss or disclose depreciation and amortization expenses that would include in whole or in part the period January 1, 1986 to date, by year by function." Duquesne's FERC Form 1 provides the depreciation and amortization expense that is recorded each year and Duquesne also files depreciation reports with the PaPUC. For whatever reason, however, your clients demand every document that even "discuss[es]" such matters. By doing so, you have requested every document in our property records room. One can only suppose that you are hoping to find a "smoking gun" memorandum regarding, for example, a contentious dispute within the

Mark Sundback, Esq.  
October 10, 1997  
Page 2

company regarding straight-line depreciation. Surely, the four attorneys (and consultants) you have assigned to this matter can do better.

Duquesne also is perplexed by HSS/ARI's decision to wait 70 days after the filing of Duquesne's case to submit such "canned" document production requests. This is a matter of serious concern, given that Duquesne is working around the clock to respond to the focused interrogatories of other parties in this case. As an example, in just the last 24 hours I have received four new sets of interrogatories from other parties. Duquesne simply cannot respond in a timely fashion to the discovery requests of all parties if one party abuses the system.

With these prefatory remarks in mind, Duquesne hereby submits specific objections to the following document production requests:

HSS/ARI-2-019. This interrogatory requests "all materials which any Company representative provided to credit rating agencies, investment bankers and/or securities analysts, including transcripts of oral remarks, and slides during the period January 1, 1990 to the present." Duquesne objects to this request as burdensome and not likely to produce relevant information. Duquesne fails to understand the relevance of these documents to the matters at issue in this case.

HSS/ARI-2-021. Duquesne's objection to this request was provided above.

HSS/ARI-2-022. This interrogatory requests "all documents that discuss or disclose the capital additions budgeted by the Company, and the capital additions actually incurred by the Company, by year by function, both net and gross, for the period January 1, 1987 to December 31, 1996." Duquesne objects to this request as burdensome and not likely to produce relevant information. For whatever reason, HSS/ARI is not content to request capital addition budgets, but rather believes it is entitled to "all documents that discuss" such matters.

Mark Sundback, Esq.  
October 10, 1997  
Page 3

For the reasons stated above, Duquesne is not willing to support such fishing expeditions for the benefit of one party to this case.

HSS/ARI-2-024. This interrogatory requests "all documents in Duquesne's possession dated on or after January 1, 1986 which describe, discuss, or analyze Duquesne's ability to attract current or potential sources of capital . . ." Duquesne objects to this request as burdensome and not likely to produce relevant information. Duquesne fails to understand the relevance of such a blunderbuss request to the issues in this case.

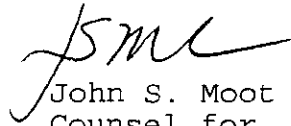
HSS/ARI-2-26. This interrogatory requests "all data related to the accuracy with which Henry Hub forward contracts of NYMEX Henry Hub futures prices ultimately have predicted or forecasted the price of natural gas . . ." Duquesne does not serve as an auditor of NYMEX or Henry Hub transactions nor is it required to compile statistical comparisons of the kind you request. Duquesne also fails to understand how one would compare the prices contained in a "forward contract" to the prices paid in actual "transactions." A forward contract is an actual transaction.

HSS/ARI-2-27. This interrogatory requests "all documents dated or written on or after January 1, 1990 that discuss, identify, propose or analyze any [cost] reduction to be experienced in whole or in part after January 1, 1996 . . ." Duquesne objects to this request as burdensome and not likely to produce relevant information. As indicated, Duquesne is not willing to support such a fishing expedition.

Mark Sundback, Esq.  
October 10, 1997  
Page 4

Please contact me if you are interested in narrowing these requests to avoid the foregoing objections. I note that Duquesne waives the requirement that any motion to compel be submitted within the time period contained in the Prehearing Order. I remain optimistic that these objections can be resolved consensually.

Sincerely,



John S. Moot  
Counsel for  
Duquesne Light Company

cc: All parties  
Prothonotary


BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility )  
Commission )  
 )  
v. ) Docket No. R-00974104  
 )  
Duquesne Light Company )  
Application for Approval of )  
a Restructuring Plan Pursuant )  
to 66 Pa. C.S. § 2806(d) )

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document, via first class mail, upon the participants on the attached service list in accordance with Section 1.54 of the Commission's regulations.

Dated this 10th day of October, 1997.

  
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October 10, 1997

*Via Facsimile and First Class Mail*

John S. Moot, Esquire  
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1440 New York Avenue, N.W.  
Washington, D.C. 20005-2111

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97 OCT 15 PM 9:19

Re: *Application of Duquesne Light Company  
for Approval of Restructuring Plan  
Docket No. R-00974104*

KJR

Dear John:

We have received your letter of October 10, 1997. Before turning to your individual objections to the Second Set of HSS Interrogatories, we wanted to address your preliminary remarks which suggest a level of anxiety concerning the timeliness of discovery in this proceeding. Particularly, you complained about receiving discovery requests yesterday.

We also are very concerned about the pace of discovery in this proceeding. As you know, our very first request in this proceeding (served upon you on September 12, 1997) requested workpapers from witness Clayton. Today I have received witness Clayton's workpapers, a month after they were requested. Given that workpapers are an integral part of the preparation of the testimony and given that they should have been prepared and in existence on the date the testimony was filed, there simply is no excuse for Duquesne's failure to produce these documents for approximately a month. Duquesne has just today provided its responses to Interrogatory No. 9, which requested, *inter alia*, copies of reports to shareholders and Forms 10-K, and Interrogatory No. 10, which requested copies of Duquesne's FERC Form 1 reports. Given the fact that these documents in many instances were in existence *for years* before the request and should be readily available to Duquesne, your decision not to furnish responses until roughly a month after the materials were request is both regrettable and inexplicable.

John S. Moot, Esquire  
October 10, 1997  
Page 2

These are just a few of many examples of your delays in responding to discovery. Responses to HSS's initial round of interrogatories were due by September 22, 1997. However, Duquesne has consistently failed to provide timely responses to interrogatories. Numerous interrogatories served on you September 12, 1997 remain outstanding now, a month after Duquesne received them. As we indicated in our letter to you dated October 7, 1997, Duquesne also has yet to respond to Interrogatory Nos. 22, 25, 28-31, 42, 44-45, 52, 75, 81 and 91. Moreover, as you know, we had tried to make arrangements to visit the Duquesne data room in Pittsburgh. At lunchtime the day before we were to visit you called to inform us that the data -- requested on September 12, 1997 -- would not be available for review on October 7, 1997, but you would attempt to get us the data subsequently.

As you know, but your letter fails to acknowledge, we have to date accommodated your requests for delay and tardiness. You repeatedly have failed to meet discovery dates regarding materials that have been in existence in some instances for years. It therefore is surprising to us that you would voice concern about additional discovery requests, many of which relate to materials which we recently received from you after substantial delays. Given your concern about the timeliness of the proceeding, we now will insist upon prompt compliance in accordance with the ground rules established by the Presiding Judge. Surely, given Skadden's size, it is not too much to expect compliance with the schedule in this case. If Skadden cannot meet its obligations, you should bring that fact to the attention of the Presiding Judge and your client.

Attached hereto is Appendix A which contains our responses to your specific objections. Once you have reviewed Appendix A, please call us so that we may resolve your objections.

Very truly yours,



Mark F. Sundback, Esq.  
Kenneth L. Wiseman, Esq.  
Peter J. Thompson, Esq.  
Counsel for Hospital Shared Services and  
Administrative Resources, Inc.

## APPENDIX A

### Request No. 19 (Set II)

Duquesne's presentations to investment bankers, securities analysts and credit rating agencies likely will reflect its assessment of *inter alia* the future market for power, and Duquesne's belief regarding its ability to control its costs. The value of generated power is directly relevant to Duquesne's case. Witness Schnitzer extolls the virtues of market assessments of the value of power because they "reflect the collective expectations of all market participants - participants betting their own money" (p.15:13-14). However, he complains that "a market valuation of utility generation assets . . . is very difficult to achieve in 1997" (p.18:2-3). The latter assertion may be impeached if Duquesne has presented proposed market valuations to investment bankers who will be "betting" money on such valuations. The materials may contain data from which a market value or price can be derived. Witness Schnitzer's testimony contains prolonged discussions of the value of power in the future (*see, e.g.*, p. 27). Witness Irwin also presents testimony concerning the value of electric power in the market (pp. 3-11), and Mr. Schnitzer discusses future market projections of prices. All of these discussions could be impeached by the materials.

Moreover, while Duquesne has an incentive in this proceeding to *inflate* its projected future cost levels, in its presentations to investment bankers and other sources of credit it has an incentive to present future costs on a more realistic basis, showing additional free cash (reflecting lower levels of expense and capital investment) to service debt and pay dividends. Similarly, statements to investment bankers regarding future competition will shed light on whether Witness Schnitzer's presumptions regarding the cost of such future competitors is fact or fancy (*see, e.g.*, pp. 25-30)

Thus, we believe the requested materials are fully relevant and are surprised that you have objected to the request.

### HSS No. 21 (Set II)

We will accept documents that reflect depreciation and amortization utilized for ratemaking and regulatory accounting by year by function, from and after January 1, 1986.

### HSS No. 22 (Set II)

The request seeks information regarding capital additions. Duquesne objects on the ground of relevance. The request will lead to relevant data for at least three reasons.

*First*, Duquesne's ability to forecast capital additions is directly relevant. Duquesne asserts that under Section 2804, it is entitled to maintain its currently unreasonable rate level for another eight years because as of January 1, 2006 it will still have at least \$8 million in unrecovered stranded costs if it is permitted to retain its current rate level. Of course, if Duquesne's budgeting and

forecasting track record shows that it has a tendency to forecast a higher level of capital additions than ultimately occurs. Duquesne's tendency is relevant. Duquesne's forecasts must be accurate down to \$1 million annually (for a cumulative effect of \$8 million) for Duquesne's estimates to satisfy Duquesne's own interpretation of Section 2804.

*Second*, to the extent Duquesne has made capital additions since its last major rate case that have not been approved by the Commission, that factor is relevant to determining whether such amounts qualify as stranded costs.

*Third*, Duquesne's effort to inflate its cost structure to try to invoke Section 2804 has produced odd projected capital additions in transmission and distribution functions. These apparently contrived and oddly inflated projected capital additions should be assessed against Duquesne's prior history of capital additions.

As a result, we believe that the request seeks relevant materials and is entirely warranted.

**HSS No. 24 (Set II)**

*See* response to Duquesne's objection to No. 19, *supra*.

**HSS No. 25 (Set II)**

The comparisons we seek are between forward contracts and prices for gas delivered in the month when the futures contracts would expire. To the extent that Duquesne and its witnesses made no effort to determine whether futures prices reflect delivered gas prices, that is pertinent information. In that case, you may simply state that you lack responsive data.

**HSS No. 27 (Set II)**

*See* response to Duquesne objection to HSS No. 22. Like capital additions, other possible cost reductions are relevant to whether Duquesne's estimation that it will have at least \$8 million in stranded costs as of January 1, 2006 is credible and accurate. Duquesne already may be planning or knows of cost reductions that will allow Duquesne to consume far more than \$1.7 billion by January 1, 2006 (*see* Clayton, pp. 2-3). Moreover, cost reductions also relate to whether Duquesne *to date* adequately has mitigated costs (*i.e.*, if reductions could be implemented, but have not been, that is highly relevant) and is taking steps in the future to mitigate costs, clearly relevant considerations under the 1996 Act.

Again, as with many of the foregoing, we are surprised that you objected to requests that are entirely properly and which simply highlight some of the weakest parts of Duquesne's case.

**MCNEES, WALLACE & NURICK**  
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October 13, 1997

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Washington, DC 20005

**Re: Application of Duquesne Light Company for Approval of its Restructuring Plan  
Under Section 2806 of the Public Utility Code; Docket No. R-00974104**

Dear Mr. Moot:

Please find enclosed two (2) copies of the Duquesne Industrial Intervenors' Interrogatories Set III to Duquesne Light Company in the above-referenced proceeding. Please send one copy of your responses, all disks and attachments to the undersigned and one copy of your responses, all disks and attachments to our consultant :

Mr. Stephen J. Baron  
J. Kennedy and Associates, Inc.  
35 Glenlake Parkway, Suite 475  
Atlanta, GA 30328

Please provide responses to all interrogatories on an expedited basis. Please endeavor to forward responses as they are completed, rather than waiting until the responses to the full set are completed.

~~DOCKETED~~  
OCT 20 1997

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976  
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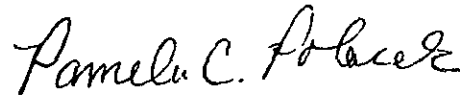
John S. Moot, Esq  
October 13, 1997  
Page 2

Please communicate any objections or questions that you may have regarding these interrogatories as quickly as possible. Copies of these interrogatories are being served on all parties consistent with the attached Certificate of Service. Thank you for your attention to this matter.

Very truly yours,

McNEES, WALLACE & NURICK

By



James P. Dougherty

Pamela C. Polacek

JPD:mas

Enclosures

c: Certificate of Service

✓ James J. McNulty, Acting Secretary (Transmittal Letter and Certificate of Service Only)

K:\126\02497.25\Moot3.ltr

**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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\_\_\_\_\_  
Pamela C. Polacek, Esq.

Dated this 13th day of October, 1997, in Harrisburg, Pennsylvania.

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NORMAN I. WHITE  
LAWRENCE R. WIEDER  
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FOLDER

October 16, 1997

James J. McNulty, Acting Secretary  
Pennsylvania Public Utility Commission  
Room B-20, North Office Building  
Harrisburg, PA 17120

KJR

VIA HAND DELIVERY


Re: **Application of Duquesne Light Company for approval of Restructuring Plan Under Section 2806 of the Public Utility Code; Docket No. R-00974104**

Dear Mr. McNulty:

Enclosed for filing please find the original and three (3) copies of the Notice of Withdrawal of Appearance on behalf of the Pennsylvania Retailers' Association ("PRA") in the above-referenced proceeding. As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served. We request that all service lists be changed to delete our name. Please date stamp the extra copy of this transmittal letter and kindly return it for our filing purposes.

Respectfully submitted,

MCNEES, WALLACE & NURICK

By   
Robert A. Mills

Counsel to the Pennsylvania Retailers' Association

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97 OCT 16 PM 3:59  
PUBLIC UTILITIES  
REGULATORY OFFICE

RAM/clc  
Enclosures

c: Honorable John H. Corbett, Jr. (via facsimile and first class mail)  
Certificate of Service

87

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF DUQUESNE LIGHT COMPANY :  
FOR APPROVAL OF RESTRUCTURING PLAN :  
UNDER SECTION 2806 OF THE : Docket No. R-00974104  
PUBLIC UTILITY CODE :

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**NOTICE OF WITHDRAWAL OF APPEARANCE**

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Please withdraw our appearance on behalf of the Pennsylvania Retailers' Association ("PRA") in the above-captioned matter.

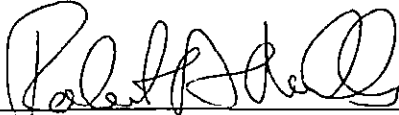
**DOCUMENT  
FOLDER**

**DOCKETED  
OCT 20 1997**

Respectfully submitted,

McNEES, WALLACE & NURICK

By



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P.O. Box 1166  
Harrisburg, PA 17108-1166  
(717) 237-5216

Counsel to the Pennsylvania Retailers' Association

Dated: October 16, 1997

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PROthonary's OFFICE  
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CERTIFICATE OF SERVICE

**ORIGINAL**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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**Certificate of Service**  
**Docket No. R-00974104**  
**Page 2**

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**Certificate of Service**  
**Docket No. R-00974104**  
**Page 4**

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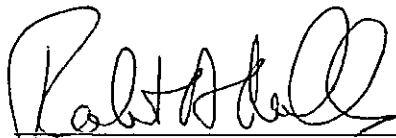
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Robert A. Mills, Esq.

Dated this 16th day of October, 1997, in Harrisburg, Pennsylvania.

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October 16, 1997

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Re: *Application of Duquesne Light Company  
for Approval of Restructuring Plan  
Docket No. R-00974104*

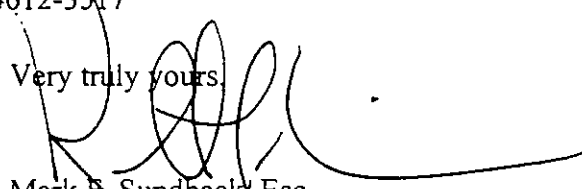
KJR

Dear John:

Attached please find the Third Set of Interrogatories of Hospital Shared Services ("HSS") and Administrative Resources, Inc. ("ARI"). In addition to serving responses to these interrogatories upon undersigned counsel, please also have the responses, including copies of all documents and diskettes, delivered to the following individual:

Robert B. Weisenmiller, Ph.D.  
MRW & Associates  
1999 Harrison Street, Suite 1440  
Oakland, CA 94612-3517

Very truly yours,

  
Mark F. Sundback, Esq.

Kenneth L. Wiseman, Esq.

Peter J. Thompson, Esq.

Counsel for Hospital Shared Services and  
Administrative Resources, Inc.

cc: All Active Participants (via First Class Mail)  
Prothonotary (w/o attachments)

WAS01:43396.1

~~DUCKETED~~  
OCT 21 1997

DOCUMENT  
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Application of Duquesne Light Company )  
for Approval of Restructuring Plan )

Docket Nos. R-00974104

**THIRD SET OF INTERROGATORIES OF  
HOSPITAL SHARED SERVICES AND ADMINISTRATIVE RESOURCES, INC.**

Pursuant to 52 Pa. Code § 5.341, Hospital Shared Services ("HSS") and Administrative Resources, Inc. ("ARI"), herein serve their third set of interrogatories as follows:

**I. INSTRUCTIONS AND DEFINITIONS**

HSS and ARI hereby incorporate by reference the instructions and definitions contained in the First and Second Sets of Interrogatories.

**II. INTERROGATORIES**

1. At page 9, lines 16-17 of Duquesne Statement No. 4, it states that

ratepayers already have enjoyed the savings that arose as a result of the Company's refinancing of debt at lower interest rates.

a. Please provide a list of each such refinancing showing the amount refinanced, the interest rate before refinancing, the interest rate after refinancing, the date of the refinancing, the allocation of the refinanced amount between generation, transmission and distribution, an explanation of the basis for the allocation, and the unamortized premium on the reacquired debt.

b. For each refinancing identified in response to subpart a, please explain how ratepayers benefited and set forth accounting records that support the assertion that ratepayers already have enjoyed the savings that arose as a result of the refinancing. Also, please identify and

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quantify (if possible) each benefit you have identified or analyzed resulting from each such refinancing.

c. If any of the refinancings identified in respect to subpart a occurred between 1986 and the present, please state whether the refinancing resulted in a rate decrease. If the answer to the above questions is anything but an unqualified "yes," please provide Duquesne's estimate of the rate reduction that would have been derived from each such refinancing.

2. Please provide copies of accounting records that support a conclusion that ratepayers have received the benefit of lower rates since 1987 due to the tax advantages of accelerated depreciation. Please provide copies of such records for all benefits associated with Duquesne's claim for \$244,800,000 in regulatory tax receivables.

a. If any of the instances of accelerated depreciation occurred between 1986 and the present, please state whether the accelerated depreciation resulted in a change to Duquesne's rates. If the answer to the above question is anything but an unqualified "yes," please provide Duquesne's estimate of the rate effect that would have been derived in each such instance of accelerated depreciation.

3. At page 14, lines 9-12 of Duquesne's Statement No. 4, it states:

In Docket P-900485, Duquesne requested, and the PUC approved, deferred accounting treatment for preservation costs associated with maintaining Phillips and Brunot Island generating plants. The Company was specifically granted the right to seek recovery of these costs upon the return to commercial operation of the plants.

Please provide a copy of the order you contend granted Duquesne the right to seek recovery of such costs, and any materials explicitly referenced in the order.

4. At page 15, lines 10-15 of Duquesne's Statement No. 5, it states that:

First, as to unbundled generation and distribution costs, we have maintained, to the extent feasible, consistency with the allocation methodologies used for generation and distribution costs from our most recent base rate proceeding. Second, while transmission costs were allocated on the basis of the average and excess methodology in Duquesne's last base rate proceeding; in the current study, transmission has been allocated to the classes using 12cp methodology.

a. Please provide a table that shows the allocation of generation, distribution and transmission costs in Duquesne's last base rate proceeding. Please also provide a table that shows the allocation of generation, distribution and transmission costs among classes in Duquesne's last base rate proceeding. If class definitions or titles have changed, please provide a detailed description of how to trace current classes to the classes defined in the last rate case.

b. Please provide a table which shows the allocation of current and projected transmission costs based upon the methodology used in Duquesne's last base rate proceeding compared to the allocation of such costs based upon the methodology used in this proceeding.

5. At page 49, lines 15-16 of the Direct Testimony of Michael Schnitzer, it states

If Duquesne sells individual generating assets, the sales price will determine the value of only those assets sold by Duquesne.

Please state whether Duquesne contends that the price per megawatt as derived from the sale of a particular generating facility can or cannot be used to establish a market value of electric generation produced from facilities that were not part of the sales transaction. Please describe in full all reasons that support your answer.

6. At page 48 of Schnitzer's testimony, it states that the three-member arbitration panel will calculate the final market value of electricity based upon a methodology chosen at its

discretion. Please describe all methodologies Duquesne would suggest for the panel's use in calculating the final market value of electricity. Also, please identify any methodologies of which Duquesne is aware that Duquesne expressly would oppose and/or not suggest and explain why such methodologies are inadequate.

7. At page 15 of Duquesne's Form 10-K for 1996, Duquesne identified approximately \$2.12 billion (year-end 1996) and \$2.52 billion (year-end 1995) in "Potential Transition Costs." Please produce all studies that were performed as part of the process of determining "Potential Transition Costs" that were reported in Duquesne's 1996 Form 10-K. Such studies should include all "high" and "Low" cases, sensitivity studies, etc. whether or not approved or relied upon by Duquesne. Also, please produce all documents that discuss any study(ies) identified.
  
8. Please calculate unit-specific annual operating costs and market revenues for the period 1998-2025 using Duquesne's preferred assumptions except as noted below:
  - a. Natural gas prices begin at \$2.30/MMBtu in 1998 and escalate at Duquesne's assumed inflation rate plus 1% per year
  - b. Henry-Hub-to-delivered-location basis differential of \$0.56/MMBtu, escalating at Duquesne's assumed inflation rate plus 1% year
  - c. No 8-year RFP resources or exchange agreements included in the resource plan.
  - d. All resources dispatched at their incremental cost of production, subject to normal assumptions regarding ramp rates, minimum operating blocks, and start-up costs.

- e. Any incremental resources needed to meet reliability requirements on the Duquesne system are met with combined cycle (CC) or combustion turbines (CT) with the following cost characteristics:

	CC	CT
Capital Costs, w/o AFUDC (\$/kW)	430	353
Fixed O&M (\$/kW-yr)	29.4	12.1
Variable O&M (\$/MWh)	0.5	0.1
Heat Rate (Btu/kWh)	7,000	11,900
Capital Structure (% equity)	50	50

Values shown above are in 1995 dollars. Assume value escalates in years after 1995 at Duquesne's assumed rate of inflation.

- f. Use, for any required annualization or levelization of capital costs, a standard mortgage payment formula rather than the real economic carrying charge.
- g. Assume market revenues for each unit equals unit generation times system marginal energy costs (including the effects of unserved energy, no-load, and start-up costs) until the year in which resources are added. From that year forward, compute market revenues using market prices using the methodology of Witness Schnitzer, as modified above.

Provide supporting workpapers, including the results of any Promod runs. Results should be in a format similar to MMS-2, -3, -4, -5, and MGK-7 and -8. Should you have any questions concerning the foregoing presumptions, please contact us immediately to resolve any such questions.

9. Please compute stranded costs using the unit costs and market revenues calculated in the foregoing interrogatory. Provide supporting workpapers. Results should be in a format similar to Exhibit DJC-3.

10. Please provide all documentation and supporting workpapers for the price of the forward natural gas price delivered to Henry Hub and shown in Exhibit MMS-3.
11. Please provide all documentation and supporting workpapers for Henry Hub-TCO basis differential shown in Exhibit MMS-3.
12. Regarding Duquesne's response to ENV-1-024. The response includes as an attachment "IRP-ELEC 10C ... Residential High Efficiency Lighting Program." This page contains a stream of avoided capacity and energy costs in the second- and third-to-last columns.
  - a. Are the dollar values shown constant or nominal?
  - b. Provide all workpapers that formed the basis of the avoided cost values
  - c. Confirm that the avoided energy cost escalation rate 2005-2025, shown is 2.0%/year. Provide the basis of the escalation rate.
  - d. Confirm that the avoided capacity cost escalation rate, 2005-2025, shown is 4.4%/year. Provide the basis of the escalation rate.
  - e. Explain why these escalation rates differ from the escalation rates used by Witness Clayton in DJC-3, of 2.5%/year.
13. Regarding Duquesne's response to HSS-1-06, please provide all copies of testimony provided by Witness Schnitzer in the last 5 years in proceedings before regulatory commissions in the states of NH, ME and NY.

14. Please identify each Duquesne witness who, prior to August 1, 1997, reviewed and/or generally was aware of, any of the documents that are contained in Duquesne's response to Interrogatory No. 21 in HSS/ARI's First Set of Interrogatories. For each such witness, identify each document that was reviewed and the approximate date of each review conducted by the witness.
  
15. Please identify, and describe in full, every conversation that took place prior to August 1, 1997, in which one or more Duquesne witnesses was involved, that included a discussion of the relationship or the testimony that Duquesne intended to file on August 1, 1997 to any of the data contained in any of the documents furnished in Duquesne's response to HSS/ARI Interrogatory No. 21 (First Set).
  
16. Please produce all documents that discuss the relationship of Duquesne's testimony in, or to be filed in, this case to any of the matters set forth in any of the documents furnished in Duquesne's response to HSS/ARI Interrogatory No. 21 (First Set).



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

October 17, 1997

In Re: R-00974104,  
R-00974104C0001-C0002

(See letter dated 09/19/97)

**Duquesne Light Company**

Application for approval of a Restructuring Plan

**NOTICE**

**This is to inform you that hearings on the above captioned case have been scheduled as follows:**

Type: Initial and Further

Date: Tuesday, January 13, 1998 - Initial Hearing  
Wednesday-Friday, January 14-16 1998 - Further Hearings  
Tuesday-Friday, January 20-23, 1998 - Further Hearings

Time: 9:00 a.m.

Location: 11th floor hearing room  
Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, Pennsylvania

Presiding Officer: Administrative Law Judge John H. Corbett, Jr.  
1103 Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, PA 1522  
Telephone: (412) 565-3550

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**Please mark your records.**

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired:  
1-800-654-5988.

pc: Judge Corbett  
Rosemary Chiavetta - BPL 111  
John Frazier - BPL 101  
Office of Trial Staff (2)  
Consumer Advocate  
Small Business Advocate  
Bill Barrett - FUS  
Norma Lewis  
Steve L. Springer, Scheduling Officer  
Beth Plantz  
Docket Section  
Calendar File

**MCNEES, WALLACE & NURICK**

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CHAD F. PHIPPS  
PAMELA C. POLACEK  
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October 17, 1997

John S. Moot, Esq.  
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1440 New York Avenue, N.W.  
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**VIA FAX AND**  
**FIRST CLASS MAIL**

**Re: Application of Duquesne Light Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code; Docket No. R-00974104**

Dear Mr. Moot:

Please find enclosed two (2) copies of the Duquesne Industrial Intervenors' Interrogatories Set IV to Duquesne Light Company in the above-referenced proceeding. Please send one copy of your responses, all disks and attachments to the undersigned and one copy of your responses, all disks and attachments to our consultant :

Mr. Stephen J. Baron  
J. Kennedy and Associates, Inc.  
35 Glenlake Parkway, Suite 475  
Atlanta, GA 30328

Please provide responses to all interrogatories on an expedited basis. Please endeavor to forward responses as they are completed, rather than waiting until the responses to the full set are completed.

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**John S. Moot, Esq.**  
**October 17, 1997**  
**Page 2**

Please communicate any objections or questions that you may have regarding these interrogatories as quickly as possible. Copies of these interrogatories are being served on all parties consistent with the attached Certificate of Service. Thank you for your attention to this matter.

Very truly yours,

McNEES, WALLACE & NURICK

By

A handwritten signature in black ink, appearing to read "J.P. Dougherty", with a long horizontal line extending to the right.

James P. Dougherty  
Pamela C. Polacek

JPD:mas

Enclosures

c: Certificate of Service

James J. McNulty, Acting Secretary (Transmittal Letter and Certificate of Service Only)

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**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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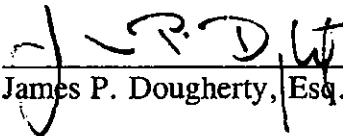
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Peoria, IL 61602

  
James P. Dougherty, Esq.

Dated this 17th day of October, 1997, in Harrisburg, Pennsylvania.

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October 17, 1997

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Pittsburgh, PA 15230-1930

John S. Moot, Esquire  
Skadden, Arps, Slate Meagher & Flom, LLP  
1440 New York Avenue, N.W.  
Washington, DC 20005

RE: Duquesne Light Company: Application for Approval of Restructuring Plan Under Section 2806 of the Public Utility Code; Docket No. R-00974104  
**INTERROGATORIES OF MAPSA**

Dear Messrs. Crayne and Moot:

Enclosed please find two (2) copies of Mid Atlantic Power Supply Association's Interrogatories Set I, to Duquesne Light Company in the above-referenced proceeding.

Responses to these Interrogatories are supposed to be due within ten (10) days of service. However, understanding that there is a good faith requirement in this case to not serve interrogatories on Friday, we do not expect replies before October 30, 1997. This should give you the sufficient additional time to prepare your answers in accordance with the prehearing order in this matter.

Please endeavor to forward responses in an organized manner as soon as they are completed, it is not necessary to await completion of all responses prior to forwarding those completed more quickly. Please send one copy of your responses to the undersigned and in addition, please provide one copy of your responses and, all attachments on diskettes to Whitfield A. Russell and Associates, Suite 850, 1225 Eye Street, NW, Washington, DC 20005. Please communicate any objections or questions you may have to these interrogatories as quickly as possible.

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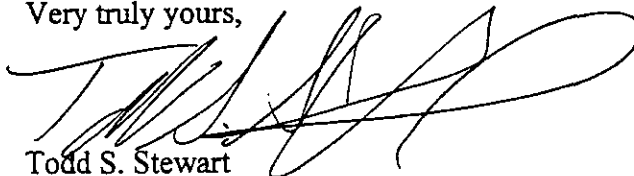
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Larry R. Crayne, Esquire  
John S. Moot, Esquire  
October 17, 1997  
Page 2

Copies of these interrogatories have been served with all parties consistent with the attached Certificate of Service.

Thank you for your attention in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "T. Stewart", written over a horizontal line.

Todd S. Stewart

Counsel for  
Mid Atlantic Power Supply Association

TSS/bab

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon person(s) and in the manner indicated below.

Service by first class mail:

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Babst, Calland, Clements & Zomnir, P.C.  
Two Gateway Center, 8<sup>th</sup> Floor  
Pittsburgh, PA 15222

Kenneth L. Wiseman, Esquire  
Andrews & Kurth, LLP  
1701 Pennsylvania Avenue, N.W.  
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**OCT 22 1997**

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Allentown, PA 18101

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Roger Clark, Esquire  
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905 Dentson Drive  
Andler, PA 19002-3901

John O'Brien, Esquire  
Wheeled Electric Power Company  
Suite 207 - 50 Charles Lindburgh Boulevard  
Uniondale, NY 11553

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Gerald Gornish, Esquire  
Alan Kohler, Esquire  
Robert J. Longwell, Esquire  
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Harrisburg, PA 17101-1236

James D. Steffes  
Enron Power Marketing, Inc.  
1400 Smith Street  
P.O. Box 4428  
Houston, TX 77002

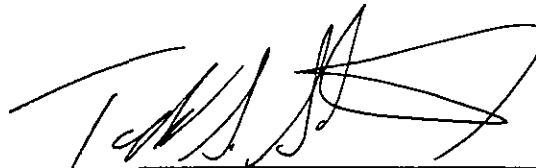
Brian Kalcic  
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225 S. Meramec Avenue  
St. Louis, MO 63105

Albert M. Benincasa  
Director, Regulatory Affairs  
Skipping Stone  
46 9<sup>th</sup> Avenue  
Sea Cliff, NY 11579

PROTHONOTARY'S OFFICE

97 OCT 20 AM 11:26

RECORDED



Todd S. Stewart

DATED: October 17, 1997

ANDREWS & KURTH L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

ATTORNEYS

1701 PENNSYLVANIA AVENUE, N.W.

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October 17, 1997

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*Via Overnight Delivery Service*

Honorable John H. Corbett, Jr.  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
1103 Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, PA 15222

DOCKETED

OCT 27 1997

OCT 17 1997

PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

Re: *Application of Duquesne Light Company  
for Approval of Restructuring Plan  
Docket No. R-00974104*

KJR

Dear Judge Corbett:

Representatives of commercial customers and industrial customers have discussed potential differences regarding certain issues, including the design of rates to recover stranded costs and the allocation of costs as between classes of customers. In the course of the proceeding, the interests of industrial customers and the interests of commercial customers may diverge on issues such as these. As a result, we also polled other customer representatives and determined that they support or have no objection to distinct party groupings for "Industrial Customers" and "Large Commercial Customers." Among customers or customer representatives supporting or not opposing this approach are:

OCA

OSBA

OTS

Duquesne Industrial Intervenors

Environmentalists

City of Pittsburgh

ARMCO, Inc.

Allegheny Teledyne Inc.

Allegheny Ludlum & Teledyne

Hospital Shared Services

Administrative Resources, Inc.

Honorable John H. Corbett, Jr.  
October 17, 1997  
Page 2

The foregoing intervenors also indicate that they support or do not oppose having Hospital Shared Services serve as coordinator for the Large Commercial Customer group. Moreover, participants were notified by facsimile transmission on October 16, 1997 that if we had not heard from them by October 17, 1997, we would represent to the Presiding Judge that large customers have agreed to this method of organization and that no participant objects. As of the time of this letter, we have not received any additional comments from participants opposing this proposal.

Consistent with your Order, this letter is being served on all active parties via facsimile. If you have any questions, please contact the undersigned. Thank you for your attention to this matter.

Respectfully submitted,



Kenneth L. Wiseman  
Mark F. Sundback  
Andrews & Kurth L.L.P.  
1701 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
TEL: (202) 662-2700  
FAX: (202) 662-2739

Attorneys for Hospital Shared Services  
and Administrative Resources, Inc.

cc: James J. McNulty, Prothonotary (*Via Overnight Delivery Service*)  
Service List (*Via Facsimile*)

TO: John L. Munsch, Esq./Theresa J. Colecchia, Esq.	FAX: (412) 838-6177
Larry R. Crayne, Esq./Richard S. Herskovitz, Esq.	(412) 393-6645
Leonard W. Belter, Esq./Raymond B. Wuslich, Esq.	(202) 371-5950
John S. Moot, Esq./Kurt Bilas, Esq.	(202) 393-5760
Stephen J. Baron	(770) 396-0151
Randall J. Falkenberg/Lane W. Kollen	(770) 396-0151
Kandace F. Melillo, Esq./Wayne T. Scott, Esq.	(717) 772-2677
Irwin A. Popowsky, Esq./Marisa A. Sifontes, Esq./Steven K. Steinmetz, Esq.	(717) 783-7152
Samuel W. Braver, Esq./Thomas L. VanKirk, Esq./ Bruce A. Americus, Esq.	(412) 562-1041
Robert J. Stefanko, Esq.	(412) 622-7995
Karen Oill Moury, Esq./Angela T. Jones, Esq.	(717) 783-2831
Exeter Associates, Inc.	(301) 622-2686
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Denice Covert Zeve, Esq./Terry Lupia, Esq.	(717) 787-1190
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Wanda Schiller, Esq.	(412) 394-6574
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Scott J. Rubin, Esq.

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(717) 541-1970

TO: Michael Reid, Director  
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Timothy Moran  
Roger Clark, Esq.  
Kenneth Maiman, Esq./Robert M. Lamkin, Esq.  
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James P. Dougherty

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(212) 850-2929  
(717) 234-1939  
717-237-5300



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

October 18, 1997

In Re: R-00974104,  
R-00974104C0001-C0002

(See letter dated 10/17/97)

**Duquesne Light Company**

Application for approval of a Restructuring Plan

**CORRECTED NOTICE**

KJR

**Our notice dated October 17, 1997 indicated incorrect dates for the Initial and Further Hearings in the above captioned case. A reprint of that notice with the correct information follows:**

**This is to inform you that hearings on the above captioned case have been scheduled as follows:**

**Type:** Initial and Further

**Date:** Monday, December 15, 1997 - Initial Hearing (Correction)  
 Tuesday-Friday, December 16-19, 1997 - Further Hearings (Correction)  
 Monday-Friday, January 5-9, 1998 - Further Hearings (Correction)

**Time:** 9:00 a.m.

**Location:** 11th floor hearing room  
 Pittsburgh State Office Building  
 300 Liberty Avenue  
 Pittsburgh, Pennsylvania

**Presiding Officer:** Administrative Law Judge John H. Corbett, Jr.  
 1103 Pittsburgh State Office Building  
 300 Liberty Avenue  
 Pittsburgh, PA 1522  
 Telephone: (412) 565-3550

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013821

**Please change your records.**

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5988.

pc: Judge Corbett  
Rosemary Chiavetta - BPL 111  
John Frazier - BPL 101  
Office of Trial Staff (2)  
Consumer Advocate  
Small Business Advocate  
Bill Barrett - FUS  
Norma Lewis  
Steve L. Springer, Scheduling Officer  
Beth Plantz  
Docket Section  
Calendar File

THE LAW FIRM OF

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October 20, 1997

MAILING ADDRESS:  
P.O. BOX 1778  
HARRISBURG, PA 17105

97 OCT 20 AM 11:25  
PROTHONOTARY'S OFFICE

James J. McNulty, Acting Secretary  
Pennsylvania Public Utility Commission  
North Office Building - Filing Room  
PO Box 3265  
Harrisburg, PA 17105-3265

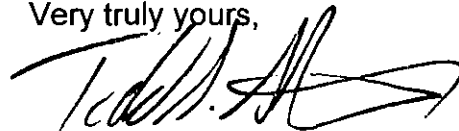
KJR

RE: Duquesne Light Company - Application of approval of restructuring plan under Section 2806 of the Public Utility Code; Docket No. R-00974104; **INTERROGATORIES OF MAPSA**

Dear Mr. McNulty:

On October 17, 1997, MAPSA sent one of its Interrogatories to Duquesne Light Company in the above-captioned proceeding. Interrogatories were served upon all parties on the attached service list. Enclosed please find the cover letter and service list from those Interrogatories. Due to clerical error, copies of the enclosed letter and service list letter were not served upon you on Friday, October 17, but rather are being served upon you by hand delivery. If you have any questions concerning this filing, please direct them to me.

Very truly yours,



Todd S. Stewart  
Counsel for  
Mid-Atlantic Power Supply  
Association

TSS/kmg  
Enclosure

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COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

October 20, 1997

KJR

In Re: R-00974104,  
R-00974104C0001-C0002,  
A-~~00~~ 110150F0015

(See letter dated 10/18/97)

R-00974104, R-00974104C0001-C0002  
Duquesne Light Company

Application for approval of a Restructuring Plan

A-00110150F0015

Joint Application of DQE, Inc., Allegheny Power Systems, Inc., and AYP SUB, INC.

For approval of the transfer by merger of the property and rights of Duquesne Light Company to Allegheny Power Systems, Inc.

NOTICE

This is to inform you that the Public Input Hearing(s) on the above-captioned cases will be held as follows:

Wednesday, November 12, 1997 at 7:00 p.m.

Holiday Inn  
Route 18 North  
PO Box 696  
Beaver Falls, Pennsylvania 15010  
Point of Contact: Sherry Hall (412) 846-3700  
Fax: (412) 846-3700

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Thursday, November 13, 1997 at 1:00 p.m. and 7:00 p.m.

JVH Auditorium  
Point Park College  
201 Wood Street  
Pittsburgh, Pennsylvania 15222  
Point of Contact: Jan Ryan (412) 392-3840  
Fax: (412) 261-5303

Presiding Officer:     **Administrative Law Judge John H. Corbett, Jr.**  
1103 Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, PA 1522  
Telephone: (412) 565-3550

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5988.

pc:     **Chairman Quain**  
      **Vice Chairman Bloom**  
      **Commission Hanger**  
      **Commissioner Rolka**  
      **Commissioner Brownell**  
      Judge Corbett  
      Rosemary Chiavetta - BPL 111  
      John Frazier - BPL 101  
      Office of Trial Staff (2)  
      Consumer Advocate  
      Small Business Advocate  
      Bill Barrett - FUS  
      Norma Lewis  
      Steve L. Springer, Scheduling Officer  
      Beth Plantz  
      Docket Section  
      Calendar File

**APPEARANCE SHEET**

**ALJ HEARING REPORT**

Docket No. R-00974104  
R-00974104C0001-C0002  
 Case Name PA Public Utility Commission  
v.  
Duquesne Light Company  
 Location Pittsburgh  
 Date October 21, 1997  
 ALJ Corbett  
 Reporting Firm \_\_\_\_\_

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES \_\_\_ NO   
 Hearing held YES \_\_\_ NO  *KJR*  
 Testimony taken YES \_\_\_ NO   
 Transcript due YES \_\_\_ NO   
 Hearing concluded YES \_\_\_ NO   
 Further hearing needed YES  NO \_\_\_  
 Estimated add'l days *scheduled*  
 RECORD CLOSED YES \_\_\_ NO   
 DATE \_\_\_\_\_  
 Briefs to be Filed YES \_\_\_ NO   
 DATE \_\_\_\_\_  
 BENCH DECISION YES \_\_\_ NO

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OCT 24 1997

OFFICE OF C.A.L.J.  
 PUBLIC UTILITY COMMISSION

REMARKS: *Prehearing Conference cancelled.*

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NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD  
 PLEASE PRINT CLEARLY  
 INCOMPLETE INFORMATION MAY RESULT IN DELAY OF PROCESS

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Telephone No.	City	State	Zip	
Telephone No.	City	State	Zip	

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Telephone No.	City	State	Zip	
Telephone No.	City	State	Zip	



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

October 22, 1997

In Re: R-00974104,  
R-00974104C0001-C0002

(See letter dated 09/19/97)

**Duquesne Light Company**

Application for approval of a Restructuring Plan

KJR

**NOTICE**

This is to inform you that the Second Prehearing Conference now scheduled to be held on Tuesday, October 21, 1997 at 2:00 p.m. in Pittsburgh, Pennsylvania has been canceled.

Presiding Officer: **Administrative Law Judge John H. Corbett, Jr.**  
1103 Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, PA 1522  
Telephone: (412) 565-3550

**Please mark your records.**

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
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pc: Judge Corbett  
Rosemary Chiavetta - BPL 111  
John Frazier - BPL 101  
Office of Trial Staff (2)  
Consumer Advocate  
Small Business Advocate  
Bill Barrett - FUS  
Norma Lewis  
Steve L. Springer, Scheduling Officer  
Beth Plantz  
Docket Section  
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OCT 22 1997

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10/21/97