

LEGAL SERVICES



Allegheny Energy

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E-mail: [jmunsch@alleghenyenergy.com](mailto:jmunsch@alleghenyenergy.com)

July 31, 2000

ORIGINAL

RECEIVED

**VIA FEDERAL EXPRESS**

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
North Office Building, Room B20  
Harrisburg, PA 17105-3265

JUL 31 2000

PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Petition of Duquesne Light Company for Approval of Plan for  
Post-Transition Period POLR Service; Docket No. R-00974104**

Dear Secretary McNulty:

Enclosed for filing with the Pennsylvania Public Utility Commission, please find an original and three (3) copies of a **Petition to Intervene of Allegheny Power** in the above-captioned docket.

As evidenced on the Certificate of Service attached to this Petition, all parties of record will be served with a copy of the document.

Very truly yours,

DOCUMENT  
FOLDER

*John L. Munsch*  
John L. Munsch  
Senior Attorney

Enclosures

cc: Certificate of Service

114

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**ORIGINAL**

Petition of Duquesne Light Company for :  
Approval of Plan for Post-Transition : Docket No. R-00974104  
Period POLR Service :

**DOCUMENT  
FOLDER  
RECEIVED**

**DOCKETED**  
AUG 2 2000

---

**PETITION TO INTERVENE  
OF ALLEGHENY POWER**

---

JUL 31 2000  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Allegheny Power submits its Petition to Intervene pursuant to Sections 5.71 through 5.75 of the rules and regulations of the Pennsylvania Public Utility Commission ("Commission"), and in support thereof states as follows:

1. Allegheny Power is the trade name of West Penn Power Company, a public utility authorized to provide electric transmission and distribution service in 23 counties in Pennsylvania.

2. The attorney for Allegheny Power in this proceeding will be:

John L. Munsch  
800 Cabin Hill Drive  
Greensburg, PA 15601  
Phone: 724-838-6210  
FAX: 724-838-6177  
[jmunsch@alleghenyenergy.com](mailto:jmunsch@alleghenyenergy.com)

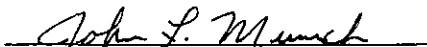
3. Duquesne Light Company's ("Duquesne") Petition for Approval of Plan for Post-Transition Period POLR Service is the first plan presented to the Commission addressing the obligations of an electric distribution company ("EDC") under Section 2807(e)

of the Electric Generation Customer Choice and Competition Act, relating to an EDC's obligation to serve in a post-transition period. Duquesne's stated position in its proceeding is, among other things: 1) to extend its transmission and distribution rate cap through December 31, 2003; and 2) to impose new POLR rates for each rate class.

4. As an electric distribution company in Pennsylvania, and serving an area geographically adjacent to Duquesne, Allegheny Power has an interest in the proceeding which may be directly affected by the proceeding. Inasmuch as the Commission's determination, or other outcome in the proceeding, could lead to a template for other post-transition plans for EDCs, Allegheny Power submits that it may be directly affected. In particular, to the extent that the Commission or parties determine that an extension of the rate cap into a post-transition period is appropriate, Allegheny Power's interests are affected. Further, to the extent that the proceeding addresses customers returning to POLR service, Allegheny Power has a direct interest in formulation of policy to address the "gaming" of POLR service by customers switching from EGS to POLR during high cost periods.

WHEREFORE, Allegheny Power respectfully requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene in the above-captioned matter.

Date: July 31, 2000

By:   
John L. Munsch  
Attorney for  
ALLEGHENY POWER  
800 Cabin Hill Drive  
Greensburg, PA 15601  
724-838-6210

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for :  
Approval of Plan for Post-Transition : Docket No. R-00974104  
Period POLR Service :

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of August 2000, a true and correct copy of the foregoing document will be served via first-class mail, postage prepaid, upon the following:

Kenneth Zielonis  
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300 Fort Pitt Commons  
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Jacqueline R. Morrow  
Assistant City Solicitor  
313 City County Building  
414 Grant Street  
Pittsburgh, PA 15219

Robert Weishaar, Jr.  
David Kleppinger  
McNees Wallace & Nurick  
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Office of Consumer Advocate  
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Commerce Building, Suite 1102  
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Kandace F. Melillo  
Wane Scott  
Office of Trial Staff  
PA Public Utility Commission  
P.O. Box 3265  
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Pennsylvania Retailers' Association  
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Suite 1440-1999 Harrison Street  
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Low Income Advocate Parties  
1705 Allegheny Building  
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Thomas Thomas Armstrong & Niesen  
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Alan Kohler  
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Honorable Richard A. Kasunic  
Democratic Policy Chairman  
Senate of Pennsylvania  
Senate Post Office - Main Capitol  
Harrisburg, PA 17120

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Westmoreland County Commissioners  
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Greensburg, PA 15601

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90<sup>th</sup> Legislative District  
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Pittsburgh, PA 15222-1458

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Pennsylvania House of Representatives  
51<sup>st</sup> District  
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Fay-Penn Economic Development Council  
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Pennsylvania State Representative  
Main Capitol Building  
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Harrisburg, PA 17120-2020

Honorable Tim Murphy  
37<sup>th</sup> Senatorial District  
Senate Post Office – Main Capitol  
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Honorable Susan Laughlin  
c/o R. David Myers  
16 East Wing  
Harrisburg, PA 17120

Honorable Frank Dermody  
Allegheny County Democratic Delegation  
801 Freeport Road  
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Honorable Jack Wagner  
42<sup>nd</sup> District  
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Honorable Melissa Hart  
40<sup>th</sup> Senatorial District  
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Allegheny County Democratic Delegation  
112 Second Avenue  
Elizabeth, PA 15037-1539

Honorable Tom Michlovic  
Allegheny County Democratic Delegation  
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Honorable Frank J. Pistella  
Allegheny County Democratic Delegation  
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Allegheny County Democratic Delegation  
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Harrisburg, PA 17120

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Dan Donatella, Commissioner  
County of Beaver, Board of Commissioners  
Beaver County Courthouse  
Beaver, PA 15009

Honorable Don Walko  
Allegheny County Democratic Delegation  
3722 Brighton Road  
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Honorable Joseph Markosek  
Allegheny County Democratic Delegation  
4232 Northern Pike  
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Honorable Nicholas Colafella  
c/o R. David Myers  
16 East Wing  
Harrisburg, PA 17120

Honorable Michael R. Veon  
c/o R. David Myers  
16 East Wing  
Harrisburg, PA 17120

Dennis Bloom  
IBEW Local 272  
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Honorable G. Travaglio  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable V. J. Lescovitz  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable L. LaGrotta  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable H. William Deweese  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable J. Casorio, Jr.  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable T. Tangretti  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable Ross Boggs, Jr.  
Minority Leader  
Ohio House of Representatives  
4779 Route 7 North  
Andover, OH 44003

David T. Kotecki, President  
Local 270  
Utility Workers Union of America  
4205 Chester Avenue  
Cleveland, OH 44103-3616

GPU Energy  
2800 Pottsville Pike  
Reading, PA 19640-0001

Honorable S. Steelman  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
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Honorable J. Shaner  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable T. Harhai  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable P. Daley, II  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable A. Colaizzo  
Pennsylvania House of Representatives  
House Post Office – Main Capitol  
Harrisburg, PA 17120

Honorable Albert Belan  
Senate of Pennsylvania  
Senate Post Office – Main Capitol  
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Honorable David Levdansky  
311 South Office Bldg.  
House Box 202020  
Harrisburg, PA 17120-2020

Honorable Jeffrey Haban  
House Box 202020  
Room 163B East Wing  
Harrisburg, PA 17120-2020

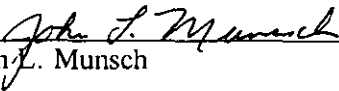
David E. Wightman, President  
Utility Workers Union of America  
220 Forbes Road, Ste. 210  
Braintree, MA 02184

David Hodgden  
Ohio Public Utility Commission  
180 East Broad Street  
Columbus, OH 43215-3793  
Carl Wood  
National Representative  
Utility Workers Union of America  
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Harrisburg, PA 17108-1146

  
\_\_\_\_\_  
John J. Munsch

DATE: August 1, 2000

SUBJECT: R-00974104

TO: Bureau of Fixed Utility Services

FROM: James J. McNulty, Secretary *J.J.*

DUQUESNE LIGHT COMPANY PLAN FOR POST-TRANSITION PERIOD  
POLR SERVICE

---

Attached is a copy of a Petition to Intervene of West Penn Power Company, filed in connection with the above docketed proceeding.

This matter is assigned to your Bureau for appropriate action.

Attachment

cc: LAW  
OTS

was

**DOCKETED**  
AUG 2 2000

**DOCUMENT  
FOLDER**

**Barbush, Barb**

---

**From:** Patrick, Janet  
**Sent:** Tuesday, August 01, 2000 1:45 PM  
**To:** Barbush, Barb  
**Subject:** FW: Duquesne Light, Docket No. R-00974104

Barb, Will you please remove this name off CU25. It is on entry #136. Thanks.

-----Original Message-----

**From:** Hodgden, David [mailto:David.Hodgden@puc.state.oh.us]  
**Sent:** Tuesday, August 01, 2000 11:37 AM  
**To:** 'mcnulty@puc.state.pa.us'  
**Subject:** Duquesne Light, Docket No. R-00974104

Dear Mr. McNulty:

Please remove my name from the Commission's Service List in this docket. Thank you.

Sincerely,

David Hodgden  
Ohio Public Utility Commission  
180 East Broad Street  
Columbus, OH 43215-3793

**DOCKETED**  
AUG 01 2000

DOCUMENT  
FOLDER

LEGAL SERVICES



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August 1, 2000

ORIGINAL

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AUG 01 2000

VIA FEDERAL EXPRESS

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
North Office Building, Room B20  
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Petition of Duquesne Light Company for Approval of Plan for Post-Transition Period POLR Service; Docket No. R-00974104**

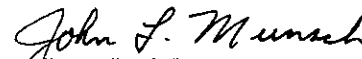
Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of an Affidavit on behalf of Allegheny Power in support of its **Petition to Intervene** in the above-captioned matter.

The Affidavit was inadvertently omitted from the filing, but was included in the mailing to the service list.

Please file the Affidavit along with Allegheny Power's Petition to Intervene.

Very truly yours,

  
John L. Munsch  
Senior Attorney

Enclosures

ORIGINAL

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA )  
 )  
COUNTY OF WESTMORELAND ) SS:

CAROLE R. CHAMBERLAIN, being duly sworn according to law, deposes and says that she is Assistant Secretary of West Penn Power Company, d/b/a/Allegheny Power; that she is authorized to and does make this affidavit for it; and that the facts set forth in the Petition to Intervene are true and correct to the best of her knowledge, information and belief and she expects to be able to prove the same at any hearing hereof.

*Carole R. Chamberlain*  
CAROLE R. CHAMBERLAIN

Sworn and subscribe before me  
this 1st day of August 2000.

*Sandra R. Klein*  
Notary Public

RECEIVED

AUG 01 2000

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Notarial Seal  
Sandra R. Klein, Notary Public  
Greensburg, Westmoreland County  
My Commission Expires June 18, 2001

DOCUMENT  
FOLDER

LOCKETED  
AUG 04 2000

# SPIEGEL & MCDIARMID

GEORGE SPIEGEL (1919-1997)

ROBERT C. MCDIARMID  
ROBERT A. JABLON  
JAMES N. HORWOOD  
ALAN J. ROTH  
FRANCES E. FRANCIS  
DANIEL I. DAVIDSON  
THOMAS C. TRAUGER  
JOHN J. CORBETT  
CYNTHIA S. BOGORAD  
GARY J. NEWELL  
SCOTT H. STRAUSS  
BEN FINKELSTEIN  
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MARGARET A. MCGOLDRICK  
P. DANIEL BRUNER  
WILLIAM S. HUANG

PUBLIC AFFAIRS DIRECTOR  
KENNETH A. BROWN  
(NOT A MEMBER OF THE BAR)  
\*MEMBER OF AK BAR ONLY

**DOCKETED**  
AUG 08 2000

August 3, 2000

James J. McNulty  
Secretary, Pennsylvania Public Utility Commission  
Room B-20, North Office Building  
North St. & Commonwealth Ave.  
Harrisburg, PA 17105

**ORIGINAL**

**Re: Application of Duquesne Light Company, Docket No. R-00974104**

**DOCUMENT  
FOLDER**

Dear Secretary McNulty:

It has recently come to my attention that two of the addresses designated for service of documents herein for the Utility Workers Union of America, AFL-CIO ("the UWUA") and its members are out of date. Mr. Carl Wood is now a Commissioner of the California Public Utilities Commission, and Mr. David Kotecki has been succeeded as President of UWUA Local No. 270. Accordingly, please revise the service list in this proceeding as follows.

Remove: Carl Wood, National Representative  
Utility Workers Union of America,  
AFL-CIO  
168 Amigos Way  
Fallbrook, CA 92028

David T. Kotecki, President  
Local 270, UWUA  
4205 Chester Avenue  
Cleveland, OH 44103

**RECEIVED**

Add: Brian McCarthy  
UWUA Deregulation Coordinator  
30 Old Farm Road  
Mansfield, MA 02048

Robert J. Chet, President  
Local 270, UWUA  
4205 Chester Avenue  
Cleveland, OH 44103

AUG 02 2000

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Thank you for your assistance, and please call me if you have any questions.

Very truly yours,

David E. Pomper  
Attorney for UWUA

cc: Service List

63

# SPIEGEL & MCDIARMID

GEORGE SPIEGEL (1918-1997)

ROBERT C. MCDIARMID  
ROBERT A. JABLON  
JAMES N. HORWOOD  
ALAN J. ROTH  
FRANCES E. FRANCIS  
DANIEL I. DAVIDSON  
THOMAS C. TRAUER  
JOHN J. CORBETT  
CYNTHIA S. BOGORAD  
GARY J. NEWELL  
SCOTT H. STRAUSS  
BEN FINKELSTEIN  
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\*MEMBER OF AN BAR ONLY

August 3, 2000 RECEIVED

James J. McNulty  
Secretary, Pennsylvania Public Utility Commission  
Room B-20, North Office Building  
North St. & Commonwealth Ave.  
Harrisburg, PA 17105

**DOCUMENT FOLDER**

PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Application of Duquesne Light Company, Docket No. R-00974104**

Dear Secretary McNulty:

It has recently come to my attention that two of the addresses designated for service of documents herein for the Utility Workers Union of America, AFL-CIO ("the UWUA") and its members are out of date. Mr. Carl Wood is now a Commissioner of the California Public Utilities Commission, and Mr. David Kotecki has been succeeded as President of UWUA Local No. 270. Accordingly, please revise the service list in this proceeding as follows.

Remove: Carl Wood, National Representative  
Utility Workers Union of America,  
AFL-CIO  
168 Amigos Way  
Fallbrook, CA 92028

David T. Kotecki, President  
Local 270, UWUA  
4205 Chester Avenue  
Cleveland, OH 44103

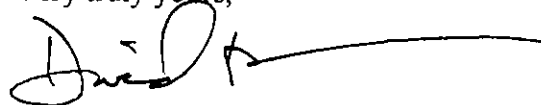
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Add: Brian McCarthy  
UWUA Deregulation Coordinator  
30 Old Farm Road  
Mansfield, MA 02048

Robert J. Chet, President  
Local 270, UWUA  
4205 Chester Avenue  
Cleveland, OH 44103

Thank you for your assistance, and please call me if you have any questions.

Very truly yours,



David E. Pomper  
Attorney for UWUA

cc: Service List

63