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July 7, 1997

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VIA FACSIMILE

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PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

**Re: Application of PECO Energy Company For Approval  
Of Its Restructuring Plan Under Section 2806  
Of The Public Utility Code; Docket No. R-00973953**

Dear Mr. Bonney:

Enclosed are Allegheny Power's Answers to PECO Energy Company's Interrogatories, Set I, MP-II, Question Nos. 1 through 10, and 12 through 17.

Should you have any questions, please call us.

Sincerely,



Deborah A. Swanstrom

Enclosure

cc: James J. McNulty (Certificate of Service Only)  
All Parties (By First Class Mail)

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application Of PECO Energy Company :  
For Approval Of Its Restructuring :  
Plan Under Section 2806 Of The :  
Public Utility Code :

Docket No. R-00973953

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of <sup>PA PUBLIC UTILITY COMMISSION</sup> ~~of Allegheny Powers~~ PROTHONOTARY'S OFFICE  
Answers to PECO Energy Company's Interrogatories, Set I, MP-II, Question Nos. 1  
through 10, and 12 through 17, upon the participants, listed below, in accordance with  
the requirements of § 1.54 (relating to service by a participant).

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Dated this 7th day of July, 1997.

  
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Attorney for Allegheny Power

ORIGINAL

CERTIFICATE OF SERVICE DOCUMENT FOLDER

Re: Application of PECO Energy Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code Docket No. R-00973953

KJR

I hereby certify that I have this day served a true copy of the foregoing document, OCA's, Responses to PECO's Interrogatories, Set II, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 7th day of July, 1997.

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VIA HAND DELIVERY

James McNulty, Deputy Prothonotary  
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FOLDER

Re: PECO Energy Company Restructuring Plan  
Docket No. R-00973953

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PROTHONOTARY'S OFFICE

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations at 52 Pa. Code §5.342(d), is a Certificate of Service identifying GPU Energy Company's Answers to PECO Energy Company's Interrogatory Set MP-II, Questions 1-17 served today on the active participants in this proceeding.

If you have any questions regarding this letter, please call.

Very truly yours,

*Terrance J. Fitzpatrick*  
Terrance J. Fitzpatrick cc

TJF/cc  
Attachment  
cc: All Parties of Record

# ORIGINAL

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the GPU Energy Company's Answers to PECO Energy Company's Interrogatory Set MP-II, Questions 1-17 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant).

Service by U.S. First Class Mail, postage prepaid, addressed as follows:

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97 JUL -7 PM 3:19 July 2, 1997

Commonwealth of Pennsylvania  
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Dear Commission:

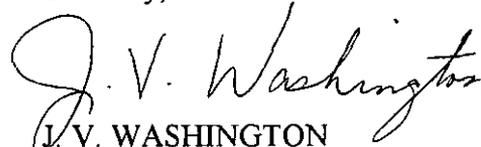
KJR

This is to inform you that the current address being used for the Department of Navy in Docket R-00973953 is incorrect. The service list was recently changed to reflect our current address, which is as follows:

Department of Navy  
Naval Facilities Engineering Command  
Navy Rate Intervention  
901 M Street SE, Building 212  
Washington, DC 20374-5018

Please reflect our current address in the present docket as well as future dockets.

Sincerely,



J. V. WASHINGTON  
Legal Technician

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JUL 15 1997

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July 8, 1997

00503

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2301 Market Street  
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Re: **Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

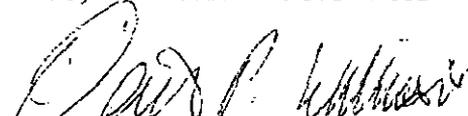
Dear Paul:

Enclosed is the response of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Set MP-II, nos. 3 and 5.

Very truly yours,

McNEES, WALLACE & NURICK

By

  
Derrick P. Williamson

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DPW/jb

c: Certificate of Service  
James J. McNulty, Prothonotary (Certificate of Service only)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing interrogatory responses upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL:**

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217 Rodman Avenue  
Jenkintown, PA 19046

  
Derrick P. Williamson

Dated this 8th day of July, 1997, in Harrisburg, Pennsylvania.



**PECO ENERGY RECEIVED**

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PA PUBLIC UTILITY COMMISSION  
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July 8, 1997

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Ward L. Smith  
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Assistant General Counsel

**By Fax and First Class Mail**

Tanya McCloskey  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

KJR

Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Tanya:

Enclosed are two copies of PECO Energy Company's Interrogatories to Office of  
Consumer Advocate, Set V, numbered 1 through 12.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

cc: Certificate of Service (w/enclosure)  
James McNulty, Acting-Prothonotary (Certificate of Service Only)

DOCUMENT  
FOLDER

Certificate of Service

I hereby certify that I have this day served the foregoing document on the following in the matter of Pennsylvania Public Utility Commission v. PECO Energy Company Pa. PUC Docket No. R-00973953.

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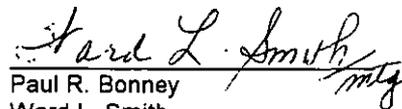
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Dated: July 8, 1997

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DWS KCG

PECC ENERGY CC

2301 MARKET ST

PHILADELPHIA

PA 19103

James McNulty

~~Robert Frazier, Prothonotary~~

Pennsylvania Public Utility Commission

Room 206, North Office Building

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PA

17105-3265

State

9529119386



232

WOLF, BLOCK, SCHORR AND SOLIS-COHEN

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DIRECT DIAL NUMBER:  
(215) 977-2118

005618

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July 8, 1997

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MEM

Ward L. Smith, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

Re: Application of PECO Energy Company for Approval  
of its Restructuring Plan under Section 2806 of the  
Public Utility Code, Docket No. R-00973953

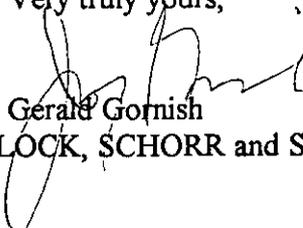
Dear Ward:

I enclose answers to the following Interrogatories from PECO to Enron:

Set II:1-47, 49-50; Set MP-II:1-17; Set III:1-5; Set IV:1.

Because of their volume, the attachments to II-13 and II-14 are being sent to PECO only. I hope to have the answer and documents for Set II-48 tomorrow.

Very truly yours,

  
Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG/lak

Enclosures

cc: James McNulty, Acting Prothonotary (Certificate of Service only)  
Certificate of Service

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PECO Energy Company  
for Approval of its Restructuring Plan  
Under Section 2806 of the Public  
Utility Code

005619

Docket No. R-00973953 27 JUL 14 AM 10:01

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Responses to PECO Set II:1-47, 49-50; Set MP-II:1-17; Set III:1-5 and Set IV:1 to participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**HAND DELIVERY**

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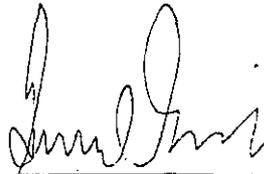
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---

Gerald Gornish

Dated: July 8, 1997



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and General Counsel

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July 9, 1997

Sandra H. Byrne  
Legal Administrator

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John C. Halderman  
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Wendy Schermer  
Susan E. Sciamanna  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

## By Overnight Delivery

Tanya McCloskey  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

MEM

Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Tanya:

Enclosed are PECO Energy Company's Answers to the Office of Consumer  
Advocate's Interrogatories:

Set XV: OCA-XV-8.

If you have any questions, please call me at (215) 841-4252.

Sincerely,

Paul Bonney

PRB/rmt  
Enclosures

cc: w/enclosures  
James McNulty, Acting Prothonotary (Certificate of Service Only)

DOCUMENT  
FOLDER



**PECO ENERGY**

Legal Department

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97 JUL 14 AM 10:56

July 9, 1997

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Assistant General Counsel

**By Overnight Delivery**

Alan J. Barak, Esquire  
1417 Blue Mountauin Parkway  
Harrisburg, PA

Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Alan:

Enclosed are PECO Energy Company's Answers to Environmentalists'  
Interrogatories:

Set II: Environmentalists-II-68 through Environmentalists-II-77;  
Environmentalists-II-80 through Environmentalists-II-84;  
Environmentalists-II-108 and Environmentalists-II-109;  
Environmentalists-II-170 through Environmentalists-II-173.

Set III: Environmentalists-III-133

Sincerely,

Paul Bonney

PRB/rmt  
Enclosures

cc: w/enclosures  
James McNulty, Acting Prothonotary (Certificate of Service Only)

DOCUMENT  
FOLDER

Certificate of Service

I hereby certify that I have this date served the following Answers by facsimile, first class or overnight/express mail, upon the persons addressed below:

Office of Consumer Advocate's Interrogatories: **Set XV:OCA-XV-8**

Environmentalists: Interrogatories: **Set II** Environmentalists II-68 through Environmentalists II-77;  
Environmentalists II-80 through Environmentalists II-84; Environmentalists II-108 and Environmentalists II-109; Environmentalists II-170 through Environmentalists II-173. **Set III** Environmentalists III-133.

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Charles Shields, Prosecutor  
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Dated: June 25, 1997



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July 9, 1997

## By Fax and First Class Mail

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Re: Application of PECO Energy Company for Approval of its Restructuring Plan under  
Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Dan:

Pursuant to our telephone conversation of today, I will not file a Motion to Compel regarding your answers to Interrogatory Set MP-II. Instead, I have re-drafted some of the questions contained in that Set to better define the issues being addressed. Accordingly, enclosed are two copies of PECO Energy Company's Interrogatories to Indianapolis Power & Light Company, Set II, numbered 1 through 5.

Sincerely,

Ward L. Smith  
Paul Bonney

PRB/mtg

Enclosures

cc: Certificate of Service (w/enclosure)  
James McNulty, Acting Prothonotary (Certificate of Service Only)

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Certificate of Service

I hereby certify that I have this day served the foregoing document on the following in the matter of Pennsylvania Public Utility Commission v. PECO Energy Company Pa. PUC Docket No. R-00973953.

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**VIA FAX AND**  
**FIRST CLASS MAIL**

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

Dear Ms. Swanstrom:

Enclosed is the response of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to Allegheny Power's Interrogatories, Set I, nos. 1, 2, 8 and 14.

Very truly yours,

McNEES, WALLACE & NURICK

By *Derrick P. Williamson*  
Derrick P. Williamson

DPW/jb  
c: Certificate of Service  
James J. McNulty, Prothonotary (Certificate of Service only)

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CERTIFICATE OF SERVICE

005299

I hereby certify that I have this day served a true copy of the foregoing interrogatory 18  
responses upon the participants listed below in accordance with the requirements of 52 Pa.  
Code § 1.54 (relating to service by a participant).

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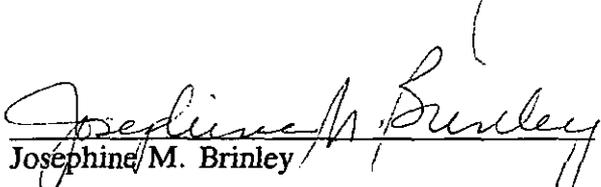
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Penn. Energy Project

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July 9, 1997

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RE: Application of PECO Energy Company for Approval  
of its Restructuring Plan/Docket No. R-00973953

Certificate of Service for the Entry of Appearance of Roger E. Clark

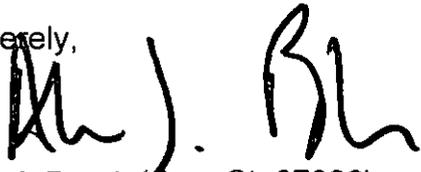
Dear Mr. McNulty:

Enclosed please find the original and two copies of the Certificate of Service that should have been attached to the Entry of Appearance of Roger E. Clark, attorney for The Environmentalists, previously mailed to your office and dated July 3, 1997.

Please time-stamp our enclosed 'office copy' of the Certificate of Service and return it in the envelope provided.

We apologize for any inconvenience caused by our error.

Sincerely,



Alan J. Barak (Sup. Ct. 67886)  
Counsel for The Environmentalists

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cc: The Hon. Marlane Chestnut/The Hon. Charles Rainey, Jr.  
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RE: Pennsylvania Public Utility Commission

v.

PECO Energy Company  
Docket No. P-00973953

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CERTIFICATE OF SERVICE

I hereby certify that I am on the 7<sup>th</sup> day of July 1997, serving the foregoing, Entry of Appearance by Roger E. Clark, upon the following persons and in the manner outlined below:

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Linda C. Smith

July 9, 1997

Paul R. Bonney, Esquire  
PECO Energy Company  
2301 Market Street  
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Re: Pennsylvania Public Utility Commission v. PECO Energy  
Company for Approval of its Restructuring Plan under  
Section 2806 of the Public Utility Code; Docket No. R-  
00973953

Dear Mr. Bonney:

Enclosed are the responses of the American Association of  
Retired Persons to PECO Energy Company's Interrogatories Regarding  
Market Price Assumptions Set MP-II (Residential Customer) - 1-7.

Very truly yours,

*Linda C. Smith*

Linda C. Smith

LCS:sdc  
Enclosures

cc: Certificate of Service  
James McNulty, Prothonotary (Certificate of Service only)

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**CERTIFICATE OF SERVICE**

I, Linda C. Smith, Esquire, hereby certify that I have this day caused a true copy of the foregoing to be served upon the parties of record in Docket No. R-80973953 in accordance with the requirements of 52 Pa. Code Section 1.549 (relating to service by a participant), in the manner and upon the parties listed below.

Dated at Harrisburg, Pennsylvania, July 9, 1997

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*Linda C. Smith*  
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CERTIFICATE OF SERVICE

Re: Application of PECO Energy Company  
for Approval of its Restructuring Plan  
Under Section 2806 of the Public Utility Code  
Docket No. R-00973953

I hereby certify that I have this day served a true copy of the foregoing document, OCA's, Responses to PECO's Interrogatories, Sets MP-I & III, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 10th day of July, 1997.

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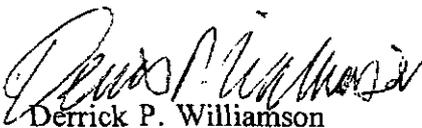
Re: **Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

Dear Ms. Swanstrom:

Enclosed is the response of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to Allegheny Power's Interrogatories, Set I, nos. 3-7, 9-13 and 15-23.

Very truly yours,

McNEES, WALLACE & NURICK

By   
Derrick P. Williamson

DPW/jb

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I hereby certify that I have this day served a true copy of the foregoing <sup>RECEIVED</sup> ~~interrogatory~~ <sub>PROSECUTOR'S OFFICE</sub> responses upon the participants listed below in accordance with the requirements of 52 Pa.

Code § 1.54 (relating to service by a participant).

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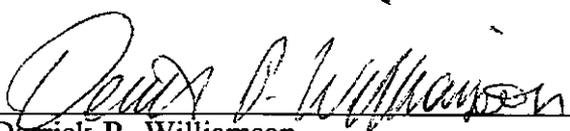
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Derrick P. Williamson

Dated this 10th day of July, 1997, in Harrisburg, Pennsylvania.



# PECO ENERGY

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PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101-8699  
215 841 5544  
Fax 215 568 3389

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Direct Dial: 215 841 4252

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Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

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Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Viina Waldron Gaston  
Gregory Golazeski  
John C. Halderman  
Mary McFall Hopper  
Stephen L. Huntoon  
Thomas G. Jackson  
J. Lindsay Johnston  
Conrad O. Kattner  
Stephanie Whitton Lewis  
Jeffrey J. Norton  
Mark B. Peabody  
Roslyn G. Pollack  
Christine A. Reuther  
Wendy Schermer  
Susan E. Sciamanna Foehl  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

## By Overnight Delivery

Karen Oill Moury, Esquire  
Assistant Small Business Advocate  
Suite 1102, Commerce Building  
300 N. 2<sup>nd</sup> Street  
Harrisburg, PA 17101

MEM

Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Karen:

Enclosed are PECO Energy Company's Answers to the Office of Small Business  
Advocate's Interrogatories:

Set I OSBA-I-25, OSBA-I-26, OSBA-I-27 and OSBA-I-29.

If you have any questions, please call me at (215) 841-4252.

Sincerely,

Paul Bonney

PRB/mbo  
Enclosures

cc: w/enclosures  
Certificate of Service (w/enclosure)  
James McNulty, Acting Prothonotary (Certificate of Service Only)

DOCUMENT  
FOLDER

Certificate of Service

I hereby certify that I have this date served the following Answers by facsimile, first class or overnight/express mail, upon the persons addressed below:

Office of Small Business Advocate's Interrogatories: Set I: OSBA-I-25, OSBA-I-26, OSBA-I-27 and OSBA-I-29.

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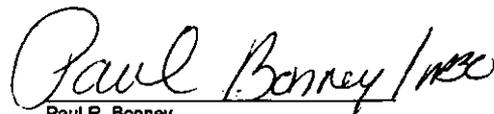
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Dated: July 10, 1997

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July 10, 1997

VIA HAND DELIVERY

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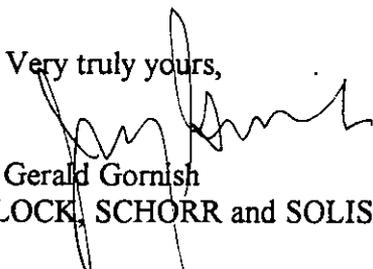
MEM

Re: Application of PECO Energy Company for Approval  
of its Restructuring Plan under Section 2806 of the  
Public Utility Code, Docket No. R-00973953

Dear Ward:

Enclosed is Enron's Response to PECO's Interrogatory Set II:48 (with  
attachments to PECO only) and Set V:6-23.

Very truly yours,



Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG/lak

Enclosures

cc: James McNulty, Acting Prothonotary (Certificate of Service only)  
Certificate of Service

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(717) 236-4812

Linda C. Smith

July 11, 1997

Paul R. Bonney, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103

Re: Pennsylvania Public Utility Commission v. PECO Energy  
Company for Approval of its Restructuring Plan under  
Section 2806 of the Public Utility Code; Docket No. R-  
00973953

Dear Mr. Bonney:

Enclosed are the responses of the American Association of  
Retired Persons to PECO Energy Company's Interrogatories to  
American Association of Retired Persons, Set II, numbered 1 through  
4.

Very truly yours,

*Linda C. Smith*  
Linda C. Smith

LCS:sdc  
Enclosures

cc: Certificate of Service  
James McNulty, Prothonotary (Certificate of Service only)

~~INDEXED~~  
JUL 21 1997

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CERTIFICATE OF SERVICE

I, Linda C. Smith, Esquire, hereby certify that I have this day caused a true copy of the foregoing to be served upon the parties of record in Docket No. R-00973953 in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the parties listed below.

Dated at Harrisburg, Pennsylvania, July 11, 1997.

VIA FIRST CLASS MAIL (ACTIVE SERVICE LIST ONLY)

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July 11, 1997

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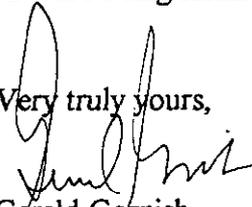
Ward L. Smith, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

Re: Application of PECO Energy Company for Approval  
of its Restructuring Plan under Section 2806 of the  
Public Utility Code, Docket No. R-00973953

Dear Ward:

Enclosed is Enron's Response to PECO-ENRON-VI:1-14; 16-17; 20-21; 23-30.  
The documents attached to PECO-ENRON-VI-3 are being furnished to PECO only because of  
their volume.

Very truly yours,

  
Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG/lak

Enclosures

cc: James McNulty, Acting Prothonotary (Certificate of Service only)  
Certificate of Service

DOCUMENT  
FOLDER

DSB:443376.1

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

005681  
Application of PECO Energy Company : Docket No. R-00973953  
for Approval of its Restructuring Plan : RECEIVED  
Under Section 2806 of the Public : PROTHONOTARY'S OFFICE  
Utility Code :

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Responses to PECO-  
ENRON Set VI:1-14; 16-17; 20-21; 23-30 to participants, listed below, in accordance with the  
requirements of § 1.54 (relating to service by a participant):

**HAND DELIVERY**

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**VIA FIRST CLASS MAIL**

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Gerald Gornish

Dated: July 11, 1997

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July 11, 1997

Paul R. Bonney, Esq.  
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VIA FEDERAL EXPRESS

Re: **Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

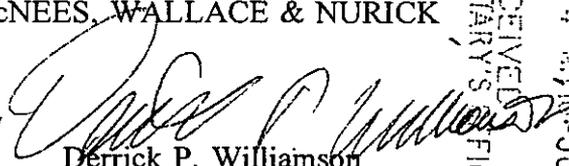
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Dear Paul:

Enclosed are the responses of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Sets IV and V.

Very truly yours,

MCNEES, WALLACE & NURICK

By   
Derrick P. Williamson

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I hereby certify that I have this day served a true copy of the foregoing interrogatory responses upon the participants listed below in accordance with the requirements of 42 Pa. Code § 1.54 (relating to service by a participant).

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KJR

Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Alan:

Enclosed are PECO Energy Company's Answers to the Environmentalists'  
Interrogatories:

Set II Environmentalists-II-110, and Environmentalists-II-111.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

cc: w/enclosures  
Certificate of Service (w/enclosure)  
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I hereby certify that I have this date served the following Answers by facsimile, first class or overnight/express mail, upon the persons addressed below:

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Dated: July 11, 1997

## Interrogatory Environmentalists-II-110

## Environmentalists-II-110 Question:

Please describe the process PECO currently uses to identify opportunities to apply targeted area planning concepts to reduce transmission and distribution system construction costs.

## Environmentalists-II-110 Answer:

In anticipation of the transition to restructuring and retail competition, PECO Energy has changed its approach to planning to meet future load growth. Currently, and for the foreseeable future, PECO Energy will employ spatial growth forecasting to identify load growth trends within the service territory, to forecast load growth and to size distribution capacity to meet load growth. Utilizing land use growth simulation software, PECO has produced a geographically referenced forecast of the locations of future load growth for residential, commercial and industrial customer classes for a twenty year planning horizon. The simulation software is calibrated to actual land development data (building permit data, subdivision/land development submissions) obtained from the county planning commissions. Areas of future load growth are identified and a forecast of when load growth reaches the firm capacity rating of each 34kV and 13kV substation has been produced.

During the next twenty years (the forecast period), PECO will annually track growth and development by substation service area. As the threshold for load relief approaches, PECO will utilize distribution load flow analysis software and strategic asset management software tools to evaluate and ultimately select the alternative which maximizes remaining available capacity and/or provides any needed additional capacity, in the most cost effective manner. Options include, but are not limited to, Power Delivery Modules, demand side management, distributed generation and changes in operating and rating practices. These tools enable PECO to employ a "just in time" approach to providing capacity to meet load growth.

Responsible Witness: J. F. Bustard

Interrogatory Environmentalists-II-111

Environmentalists-II-111 Question:

Please describe the process PECO intends to use during and after the transition to restructuring to identify opportunities to apply targeted area planning concepts to reduce transmission and distribution system construction costs.

Environmentalists-II-111 Answer:

PECO does not anticipate any changes to the process described in the response to Environmentalists -II-110 Question. We are in the preliminary stages of assessing synergy in integrating electric/gas distribution planning. This could have an impact on our future processes.

Responsible Witness: J. F. Bustard

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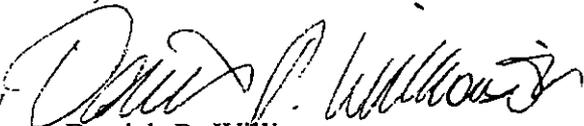
Re: **Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

Dear Paul:

Enclosed are the responses of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Set MP-II, Nos. 1 and 2.

Very truly yours,

McNEES, WALLACE & NURICK

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July 14, 1997

MEM

Paul R. Bonney, Esq.  
PECO Energy Company  
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VIA FEDERAL EXPRESS

Re: **Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

006008

Dear Paul:

Enclosed are the responses of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Set MP-II, Nos. 1 and 2.

Very truly yours,

McNEES, WALLACE & NURICK

By   
Derrick P. Williamson

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DPW/jb  
c: Certificate of Service  
James J. McNulty, Prothonotary (Certificate of Service only)

KAI4608115\BONNEY15.LTR

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing interrogatory responses upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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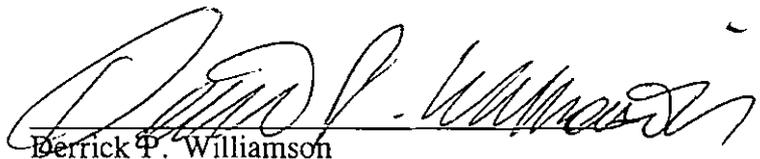
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Derrick P. Williamson

Dated this 14th day of July, 1997, in Harrisburg, Pennsylvania.

**PECO ENERGY COMPANY**  
Docket No. R-00973953  
Interrogatories and Document Requests to  
Philadelphia Area Industrial Energy Users Group - Set MP-II

- Q1. In your written pre-filed testimony served on June 20, 1997, you propose that PECO should not be allowed to recover its full stranded investment claim. Please describe how, and to what extent, the disallowance that you propose will benefit you and your shareholders. If the answer to this Request would be different for separate entities that you represent in this proceeding, please so state and provide separate responses for each entity whose answer would differ.
- A1. PAIEUG has not specifically examined how and to what extent the disallowance it proposed would benefit individual members of the group and shareholders of those members.

**DOCKETED**  
JUL 21 1997

Responsible witness: Stephen J. Baron

**DOCUMENT  
FOLDER**

**PECO ENERGY COMPANY**  
Docket No. R-00973953  
Interrogatories and Document Requests to  
Philadelphia Area Industrial Energy Users Group - Set MP-II

Q2. With regard to the benefits identified in response to Request No. 1, please explain why your shareholders, rather than PECO's shareholders, should receive those benefits. If the answer to this Request would be different for separate entities that you represent in this proceeding, please so state and provide separate responses for each entity whose answer would differ.

A2. See response to Q1.

Responsible witness: Stephen J. Baron

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006559  
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July 15, 1997

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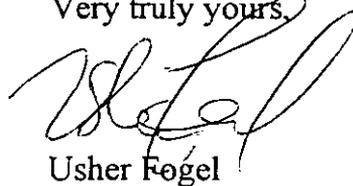
97 JUL 18 AM 8:00

Re: Application of PECO Energy Company for Approval of Its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Mr. Bonney:

Enclosed are the Pennsylvania Petroleum Association's Answers to PECO Energy  
Company's Interrogatories - Set MP-1, PECO 1-22.

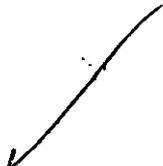
Very truly yours,



Usher Fogel

UF/mac  
Enclosure

cc: Active parties (by first class mail)  
James J. McNulty, Deputy Prothonotary - Certificate of Service only (by first class mail)  
John P. Zinkand (by first class mail)



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Re: Pennsylvania Public Utility Commission

JUL 28 1997

v.

PECO Energy Company

(Application for Approval of a Restructuring Plan)

Docket No. R-00973953

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006570

I hereby certify that I have this day served the foregoing document,  
"Answers of Pennsylvania Petroleum Association to PECO Energy Company's  
Interrogatories - Set MP-1, PECO 1-22", by first class mail, postage prepaid, upon the  
active parties of record in this proceeding, or by UPS overnight where noted.

Dated at Albany, New York, this 15th day of July, 1997.

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July 15, 1997

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DOCUMENT  
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R-00973953

KJ,

Re: PECO Restructuring Discovery Sets:  
NEV-II-1-3; MP-I-1-22; and MPS-II-1-17

Dear Mr. Bonney:

I enclose New Energy Venture's responses to the above sets of discovery requests.

Very truly yours,

Joseph A. Dworetzky

JAD:kbs

cc: Certificate of Service

James McNulty, Prothonotary (Certificate of Service only) ✓

DOCKETED

JUL 28 1997

CERTIFICATE OF SERVICE

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I hereby certify that on July 15, 1997, caused a true and correct copy of New Energy Venture, Inc.'s Interrogatory Responses NEV-II-1 to 3; MP-I-1-22 and MPS-II-1-17 to be served in the manner indicated, upon the following counsel at the addressed noted below:

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Joseph A. Dworetzky

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July 16, 1997

VIA TELECOPY AND FIRST CLASS MAIL

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KJR

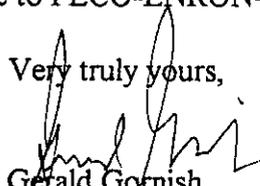
Ward L. Smith, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

Re: Application of PECO Energy Company for Approval  
of its Restructuring Plan under Section 2806 of the  
Public Utility Code. Docket No. R-00973953

Dear Ward:

Enclosed is Enron's Response to PECO-ENRON-VII:1-12.

Very truly yours,

  
Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG/lak

Enclosures

cc: James McNulty, Acting Prothonotary (Certificate of Service only)  
Certificate of Service

006576

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PECO Energy Company :  
for Approval of its Restructuring Plan :  
Under Section 2806 of the Public :  
Utility Code :

Docket No. R-00973953

**DOCKETED**

**JUL 29 1997**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Responses to PECO-ENRON Set VII:1-12 to participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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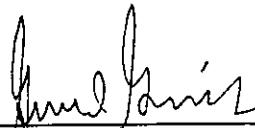
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\_\_\_\_\_  
Gerald Gornish

Dated: July 16, 1997

**ORIGINAL**  
CERTIFICATE OF SERVICE

Re: Application of PECO Energy Company  
for Approval of its Restructuring Plan  
Under Section 2806 of the Public Utility Code  
Docket No. R-00973953

KJR

I hereby certify that I have this day served a true copy of the foregoing document, OCA's, Responses to PECO's Interrogatories, Set I, Nos. 65-72, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 16th day of July, 1997.

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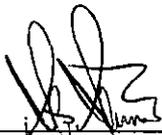
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July 16, 1997

### By Overnight Delivery

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Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Audrey:

Enclosed is PECO Energy Company's Answer to the Department of the Navy's  
Interrogatory:

Set I Navy-I-46.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

cc: w/enclosures  
Certificate of Service (w/enclosure)  
James McNulty, Acting Prothonotary (Certificate of Service Only)

006702

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I hereby certify that I have this date served the following Answers by facsimile, first class or overnight/express mail, upon the persons addressed below:

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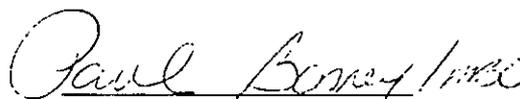
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July 16, 1997

Paul R. Bonney, Esq.  
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VIA FEDERAL EXPRESS

KJR

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470

Re: **Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

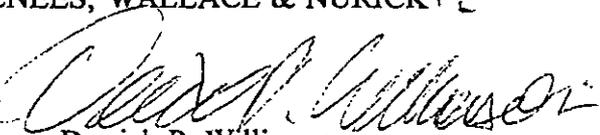
Dear Paul:

Enclosed is the supplemental response of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Set IV, No. 7. This additional attachment is confidential; other parties may obtain it only after executing a confidentiality agreement.

Very truly yours,

McNEES, WALLACE & NURICK

By

  
Derrick P. Williamson

DPW/jb

c: Certificate of Service  
James J. McNulty, Prothonotary (Certificate of Service only)

K:\14608115\BONNEY17.LTR

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I hereby certify that I have this day served a true copy of the foregoing interrogatory responses upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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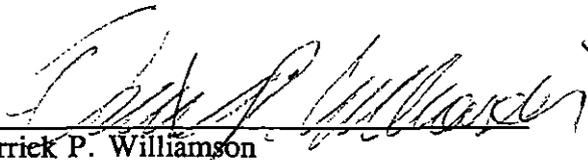
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Dated this 16th day of July, 1997, in Harrisburg, Pennsylvania.

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July 17, 1997

Honorable Marlane R. Chestnut  
Honorable Charles E. Rainey, Jr.  
Administrative Law Judges  
Pennsylvania Public Utility Commission  
1302 Philadelphia State Office Building  
1400 West Spring Garden Street  
Philadelphia, PA 19130

Re: **Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

Dear Judges Chestnut and Rainey:

Consistent with the procedural schedule in the above-referenced proceeding, enclosed please find copies of written rebuttal testimony prepared on behalf of the Philadelphia Area Industrial Energy Users Group ("PAIEUG") as follows:

(1) PAIEUG Statement No. 1R (the rebuttal testimony of Stephen J. Baron)

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Honorable Marlane R. Chestnut  
Honorable Charles E. Rainey, Jr.  
July 17, 1997  
Page 2

Copies are also being served upon all parties of record as evidenced by the attached Certificate of Service.

Very truly yours,

McNEES, WALLACE & NURICK

By   
Derrick P. Williamson

Counsel to the Philadelphia Area  
Industrial Energy Users Group

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DPW/aeh  
Enclosures

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I hereby certify that I am this day serving a true copy of the rebuttal testimony of the Philadelphia Area Industrial Energy Users Group upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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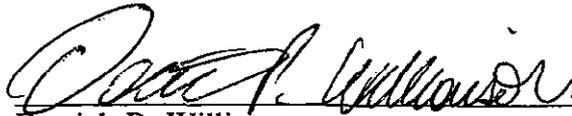
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Derrick P. Williamson

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

\* Hand deliveries will be made on July 18, 1997. Federal Express packages will go out on July 17, 1997, for delivery on July 18, 1997.



**ORIGINAL**

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**JUL 30 1997**

18 July 1997

**MEM**

Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
P.O. Box 3265, Harrisburg, PA 17105-3265

Re: R-00973953  
PECO Energy Company  
Application for approval of a Restructuring Plan  
and Consumer Education Program

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To Whom It May Concern:

This is to request a designated timeframe for the testimony of one of the Navy's proposed witnesses, Mr. Ralph Smith. Mr. Smith will be testifying in another rate hearing the week of August 18. As I assume the Company witnesses will fill most, if not all of the first week, I am requesting that Mr. Smith be allowed to present his testimony and respond to cross-examination within the timeframe of August 14-15. We would be very grateful if this request could be accommodated. Please contact the undersigned if there are any questions.

**DOCUMENT  
FOLDER**

Respectfully submitted,

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(Associate Counsel, Litigation)  
Naval Facilities Engineering Command  
Acting as Attorney for  
the Secretary of the Navy  
(202) 685-1931  
Fax: (202) 433-2591

cc:(w/encl)  
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Administrative Law Judge Charles E. Rainey, Jr.

Certificate of Service

I hereby certify that I this day served the foregoing document on the following in the matter of PECO Energy Company Interrogatories, Application for approval of a Restructuring Plan and Consumer Education Program to The Department Of The Navy.

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**VIA HAND DELIVERY**

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97 JUL 23 AM 8:34

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

Dear Ms. Miller:

Please find enclosed two (2) copies of the Philadelphia Area Industrial Energy Users Group's Interrogatories, Set I, to Mid-Atlantic Power Supply Association in the above-referenced proceeding.

Responses to these interrogatories are due within ten (10) days of service. Please endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly. Please send one (1) copy of your responses and all attachments to the undersigned. In addition, please provide one (1) copy of your responses and all attachments to:

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

Please communicate any objections or questions that you may have to these interrogatories as quickly as possible.

A copy of these interrogatories is being faxed to Donald Johnstone at Brubaker & Associates in St. Louis today. Additionally, copies are also 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 

Derrick P. Williamson

Counsel to the Philadelphia Area  
Industrial Energy Users Group

DPW/jb

Enclosures

c: Certificate of Service  
Mr. Donald Johnstone  
James J. McNulty, Prothonotary (transmittal letter and Certificate of Service only)

K:\146\08115\MILLER01.LTR

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing interrogatory responses upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Dated this 18th day of July, 1997, in Harrisburg, Pennsylvania.

COMMONWEALTH OF PENNSYLVANIA

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**Re: Application Of PECO Energy Company For  
Approval Of Its Restructuring Plan Under  
Section 2806 Of The Public Utility Code  
Docket No. R-00973953**

Dear Prothonotary:

Enclosed is a certificate of service pursuant to 52 Pa. Code §5.342(d) certifying that on this date the Office of Small Business Advocate served the responses to Interrogatories, Set II, Nos. 1 through 9, propounded by PECO Energy Company in the above-captioned proceeding. A copy has been served on all parties of record.

Sincerely,

Karen Oill Moury  
Assistant Small Business Advocate

Enclosure  
cc: Parties of Record

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Application of PECO Energy :  
Company For Approval Of Its :  
Restructuring Plan Under : Docket No. R-00973953  
Section 2806 Of The :  
Public Utility Code :

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CERTIFICATE OF SERVICE

I certify that I am serving the responses of the Office of Small Business Advocate to PECO Energy Company's Interrogatories, Set II, numbered 1 through 9 upon PECO by overnight mail and all other parties as indicated.

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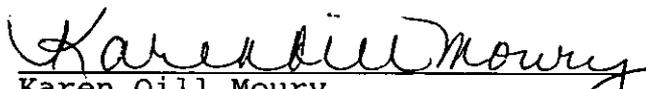
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Date: July 18, 1997

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**Re: Application of PECO Energy Company For  
Approval Of Its Restructuring Plan Under  
Section 2806 the Public Utility Code  
Docket No. R-00973953**

Dear Prothonotary:

Enclosed is a certificate of service pursuant to 52 Pa. Code §5.412(f) for filing the rebuttal testimony of Mr. Brian Kalcic in the above docket labeled OSBA Statement No. 1R.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Karen Oill Moury  
Deputy Small Business Advocate

Enclosure

DOCUMENT  
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

Application of PECO Energy :  
Company For Approval Of Its :  
Restructuring Plan Under : Docket No. R-00973953  
Section 2806 Of The :  
Public Utility Code :

JUL 28 1997

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the rebuttal testimony of Brian Kalcic on behalf of the Office of Small Business Advocate in the manner indicated upon the persons addressed below:

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Date: July 18, 1997

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July 21, 1997

**VIA HAND DELIVERY**

KJR

James McNulty, Deputy Prothonotary  
Pennsylvania Public Utility Commission  
North Office Building  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Re: PECO Energy Company Restructuring Plan  
Docket No. R-00973953

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations at 52 Pa. Code §5.342(d), is a Certificate of Service identifying Supplemental Responses of GPU Energy to PECO Interrogatories Set I, Nos. 1-12; Set MP-I, Nos. 1-22; and MP-II, Nos. 8-17.

If you have any questions regarding this letter, please call.

Very truly yours,

*Terrance J. Fitzpatrick*  
Terrance J. Fitzpatrick

TJF/cc  
Attachment

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July 21, 1997

Paul R. Bonney, Esq.  
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VIA FAX AND FEDERAL EXPRESS

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company - Application of PECO Energy Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code; Docket No. R-00973953**

Dear Mr. Bonney:

Please find enclosed two (2) copies of the Philadelphia Area Industrial Energy Users Group's Interrogatories, Set X, to PECO Energy Company in the above-referenced proceeding.

Responses to these interrogatories are due within ten (10) days of service. Please endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly. Please send one (1) copy of your responses and all attachments to the undersigned. In addition, please provide one (1) copy of your responses and all attachments to:

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

894000

Paul R. Bonney, Esq.  
July 21, 1997  
Page 2

Please communicate any objections or questions that you may have to 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   
Derrick P. Williamson

Counsel to the Philadelphia Area  
Industrial Energy Users Group

DPW/ach  
Enclosures

c: Certificate of Service  
Mr. Stephen J. Baron  
James J. McNulty, Prothonotary (transmittal letter and Certificate of Service only)

KA14608115BONNEY18.LTR

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Derrick P. Williamson

Dated this 21st day of July, 1997, in Harrisburg, Pennsylvania.

CERTIFICATE OF SERVICE

KJR

Re: Application of PECO Energy Company  
for Approval of its Restructuring Plan  
Under Section 2806 of the Public Utility Code  
Docket No. R-00973953

I hereby certify that I have this day served a true copy of the foregoing document, OCA's, Responses to PECO's Interrogatories, Set IV, Nos. 1-2, 4-10 and 12-20, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

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Re: Application of PECO Energy Company  
for Approval of its Restructuring Plan  
Under Section 2806 of the Public Utility Code  
Docket No. R-00973953

I hereby certify that I have this day served a true copy of the foregoing document, OCA's, Responses to PECO's Interrogatories, Set I, Nos. 23-32, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 22nd day of July, 1997.

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July 22, 1997

MEM

**By Overnight Delivery**

Tanya McCloskey  
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Office of Consumer Advocate  
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Harrisburg, PA 17120

Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Tanya:

Enclosed are PECO Energy Company's Answers to the Office of Consumer  
Advocate's Interrogatories:

Set XIV: OCA-XIV-1 through OCA-XIV-4.

Set XVI: OCA-XVI-1 and OCA-XVI-2.

If you have any questions, please call me at (215) 841-4252.

Sincerely,

*Paul Bonney/mbo*

Paul Bonney

PRB/mbo  
Enclosures

cc: w/enclosures  
Certificate of Service (w/enclosure)  
James McNulty, Acting Prothonotary (Certificate of Service Only)

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July 22, 1997

## By FedEx

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Re: Application of PECO Energy Company for Approval of its Restructuring  
Plan under Section 2806 of the Public Utility Code  
Docket No. R-00973953

Dear Steve:

Enclosed is PECO Energy Company's Answer to CEPA's Interrogatory

Set III: CEPA-III-1.

Sincerely,

Paul Bonney

PRB/mb

Enclosures

cc: w/enclosures  
Certificate of Service (w/enclosure)  
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I hereby certify that I have this date served the following Answers by facsimile, first class or overnight/express mail, upon the persons addressed below:

Office of Consumer Advocate's Interrogatories: Set XIV: OCA-XIV-1 through OCA-XIV-4. Set XVI: OCA-XVI-1 and OCA-XVI-2.

CEPA's Interrogatory Set III: CEPA-III-1.

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Dated: July 22, 1997