



# PECO ENERGY

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July 31, 1997

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## By Overnight Delivery

Karen Oill Moury, Esquire  
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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 Karen:

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

Set I OSBA-I-24 and OSBA-I-28.

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)

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-24 and OSBA-I-28.

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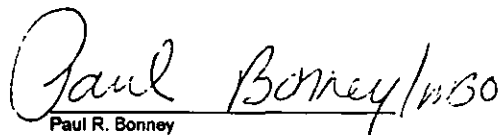
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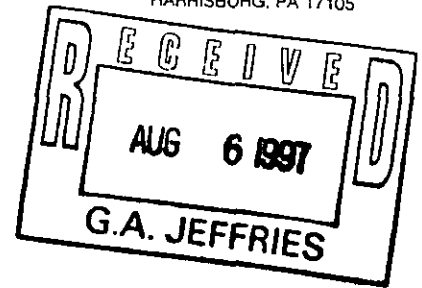
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RE: Application of PECO Energy Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code; Docket No. R-00973953; **RESPONSES OF MID-ATLANTIC POWER SUPPLY ASSOCIATION TO INTERROGATORIES OF PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP**

Dear Mr. Williamson:

Enclosed are the responses of Mid-Atlantic Power Supply Association ("MAPSA") to the Interrogatories of the Philadelphia Area Industrial Energy Users Group (Set I). Answers to each of these Interrogatories were provided by Donald E. Johnstone of Brubaker & Associates.

If you have any questions, please feel free to call.

Very truly yours,

A handwritten signature in cursive script that reads "Janet L. Miller".

William T. Hawke  
Janet L. Miller  
Todd S. Stewart

JLM/bab  
Enclosures  
cc: Steven J. Baron  
All active Parties

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PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
MID-ATLANTIC POWER SUPPLY ASSOCIATION  
SET I

DOCKET NO. R-00973953

1. On page 2 of Mr. Johnstone's rebuttal testimony, at lines 2 to 4, he states that the market price of capacity used in PAIEUG witness Baron's analysis is below the cost of new capacity. Is it Mr. Johnstone's position that the proper market capacity cost to utilize in the PECO unbundling analysis is the cost of new capacity each year, beginning with 1999?

Response:

Mr. Johnstone asserts no position with respect to the use of any particular approach for the computation of stranded cost. For the purpose of the unbundled rate design, the answer is: Yes, Mr. Johnstone recommends the use of the cost of new capacity.

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PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
MID-ATLANTIC POWER SUPPLY ASSOCIATION  
SET I

DOCKET NO. R-00973953

2. Does Mr. Johnstone believe that the correct market capacity cost to utilize in the PECO unbundling analysis is the expected market capacity cost in a given year (e.g., 1999) or the cost of new capacity?

Response:

The expected cost of new capacity should be used in a given year as stated in Mr. Johnstone's response to Interrogatory No. 1.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
MID-ATLANTIC POWER SUPPLY ASSOCIATION  
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3. Please provide all analyses performed by or available to Mr. Johnstone that provide any support for the value of market capacity for PECO customers beginning in the year 1999.

Response:

The analyses relied upon by Mr. Johnstone are those which support the three forecasts of market price that were submitted by PECO in this proceeding. The cost of capacity was estimated from the review of the studies and PECO's responses to data requests.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
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4. If Mr. Johnstone does not have any analyses as requested in the previous question, on what basis does he believe that it is appropriate to assume that market capacity rates in the PECO rate unbundling should reflect the cost of new capacity?

Response:

Fundamentally, Mr. Johnstone seeks to assure that the price used in the unbundled rates (1) will not preclude the construction of new generation capacity by non-utility power suppliers by virtue of the market price being distorted due to an unbundled generation rate that is lower than the cost of new capacity; (2) does not favor PECO as a competitor with a price that is below what the market clearing price would be absent the generation rate; (3) provides PECO with the opportunity to capture in its generation rate or selling price (to customers that do not switch to a third party) transaction costs that will likely be a part of the market price since they are an unavoidable part of the business for all suppliers except the regulated incumbent utility; (4) will provide the opportunity for third party retail generation sales at a price that recovers all of the costs of the transaction; and (5) will promote the development of a competitive market during the transition as a result of (1) through (4). Also, to the extent that market price is not undercut by the generation rate, stranded costs will be reduced.

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5. With respect to Mr. Johnstone's testimony on page 2, at lines 6 to 8, does Mr. Johnstone believe that the "PECO generation rate" establishes the market price for the entire market (e.g., PJM)?

Response:

No, but the relevant market area for the purpose of purchases by PECO retail customers consists of generation service in the retail service area of PECO. Mr. Johnstone's concern is also that a PECO generation rate that turns out to be less than the cost of procuring capacity in the larger PJM market (with cost, including transaction costs necessary for a retail sale) would, as a practical matter, limit the participation of retail customers and third party suppliers, and thereby constrict the development of a competitive retail market in the PECO service area.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
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6. Please provide all studies performed by or available to Mr. Johnstone that indicate there may be "capacity shortages" in PECO's service area if the unbundled rates recommended by Mr. Baron are adopted by the Commission.

Response:

The position of Mr. Johnstone is not based on empirical studies; but is a logical conclusion recognizing that absent the obligation to serve, a third party supplier could not reasonably be expected to install or buy capacity if the cost of such capacity exceeded the compensation which would be limited by virtue of a generation rate that turned out to be below the cost of acquiring and marketing the capacity.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
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7. Does Mr. Johnstone believe that, in a competitive market, market prices are market clearing prices?

Response:

Yes, so long as the market is in fact workably competitive, which would mean that there were multiple buyers and sellers, no barriers to entry, and none of the buyers or sellers possess market power. During the transition period, a CTC too high and/or a generation rate set too low by regulation could easily preclude development of and realization of a workably competitive retail market.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
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8. What is Mr. Johnstone's understanding of the term "market clearing prices"?

Response:

A market clearing price is one at which the amount of product that suppliers are willing to provide matches the amount that buyers are willing to purchase.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
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9. Does Mr. Johnstone believe that capacity shortages will or can occur when capacity is priced at a market clearing price?

Response:

No, assuming there is a workably competitive market which would imply that the prices of any supplier are not constrained to a level below market clearing price by regulation.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
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10. On page 2 of Mr. Johnstone's testimony, he states at lines 13-14 that the use of a 4cp allocator assumes that all of the diversity benefits that are presently on the PECO system can be maintained when native load is no longer furnished by a single supplier. At line 14 he states: "That will not be the result." Please provide all studies, analyses or experiences from competitive markets that provide the basis for Mr. Johnstone's conclusion that in a competitive market, diversity benefits will not flow to customers.

Response:

Mr. Johnstone did not state that diversity benefits will not flow to customers. Mr. Johnstone's point is that some benefit of diversity is lost with respect to the peak loads of the multiple suppliers as compared to the same total load served with a single supplier. In the long run, one would expect that this effect would result in a lower percentage reserve margin when reserves are measured as a percentage of the peak loads of the multiple suppliers as compared to the reserve percentage measured as a percentage of the coincident peak load served by a single supplier, all other factors being equal.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
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11. On page 2, at lines 20 to 21, Mr. Johnstone indicates that the reserve margin would decrease to reflect the reduction in diversity, with the total amount of capacity staying the same. Please provide all studies, analyses or experiences from competitive markets that support Mr. Johnstone's conclusions.

Response:

See response to Interrogatory No. 10. Also, the position is based on Mr. Johnstone's experience in the utility industry, including load analysis, load forecasting and planning.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
INTERROGATORIES TO  
MID-ATLANTIC POWER SUPPLY ASSOCIATION  
SET I

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12. On page 3, at lines 6 to 8 of his testimony, Mr. Johnstone recommends that the class peak load and the 4cp load be averaged to develop the capacity cost allocation for each class.
- a) Please provide copies of Mr. Johnstone's testimony during the past five years in which he has made a similar recommendation to allocate capacity costs to rate classes on the basis of the average of the class peak and 4cp (or other measure of coincident demand).
  - b) Has Mr. Johnstone performed any analyses that support the allocation of capacity cost for PECO system on the basis of the average of class peak load and coincident load (4cp)? If so, please provide such studies.

Response:

- a) There is no such testimony because such an approach would not be appropriate in the historical context wherein the sole monopoly supplier served the coincident peak load of the system.
- b) Mr. Johnstone did not intend to recommend the average of the class non-coincident peak (NCP) and the class contribution to the system peak (CP) as an appropriate basis for cost allocation. Rather, it was the intent that the average of the NCP and CP be multiplied by capacity cost, including reserve requirement, to develop the cost of capacity in a competitive market wherein capacity supply and capacity demand are in equilibrium. As in response to Interrogatory No. 10 above, one would expect the reserve criteria as a percentage of peak supplier load to fall over time as a result of this consideration. Mr. Johnstone notes that the 18% reserve used to develop capacity cost or value at market price, as the case may be, is less than the current PJM reserve requirement and that is at least consistent in direction with the effect of this phenomenon.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
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13. With respect to Mr. Johnstone's testimony at page 3, line 13, wherein he recommends the use of class-specific usage patterns in the unbundling analysis, please provide class usage patterns appropriate (in Mr. Johnstone's opinion) for the PECO unbundling analysis.

Response:

The most appropriate usage pattern would be the hourly loads of the customer classes. In the PECO rebuttal it is suggested that the forecast of market price is not available hourly, but only by on and off peak periods. Absent either a historical analysis as described in the PECO rebuttal or forecasts of hourly class loads and hourly market prices, on and off peak usage would be the recommended usage pattern.

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
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14. If neither Mr. Johnstone nor PECO has class specific usage patterns, does Mr. Johnstone believe that PECO's rates should still be unbundled or does he believe that retail competition should be delayed until such data is available?

Response:

They should be unbundled using the best information available.

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a copy of the responses of Mid-Atlantic Power Supply Association to Philadelphia Area Industrial Energy Users Group Interrogatories (Set I) upon the persons named by First-Class Mail:

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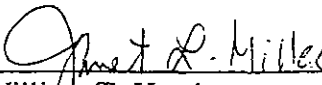
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\_\_\_\_\_  
William T. Hawke  
Janet L. Miller  
Todd S. Stewart  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street  
Harrisburg, PA 17101

DATED: August 1, 1997



# PECO ENERGY

Legal Department

KJR

James W. Durham  
Senior Vice President  
and General Counsel

001472

97 AUG 11 PM 12:34

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

Edward J. Cullen, Jr.  
Deputy General Counsel

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Direct Dial: 215 841 4252

Sandra H. Byrne  
Legal Administrator

August 1, 1997

Paul R. Bonney  
Ellen M. Cavanaugh  
Jessica N. Cone  
Todd D. Cutler  
Susan S. Foehl  
Vilna Waldron Gaston  
Gregory Golazeski  
John C. Halderman  
Mary McFall Hopper  
Conrad O. Kattner  
Stephanie Whitton Lewis  
Jeffrey J. Norton  
Mark B. Peabody  
Roslyn G. Pollack  
Wendy Schermer  
Richard S. Schlegel  
Jenny P. Shulbank  
Ward L. Smith  
Delia W. Stroud  
Dawn Getty Sutphin  
Noel H. Trask  
Ronald L. Zack  
Assistant General Counsel

## By Overnight Delivery

Daniel Clearfield, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 North Front Street, Suite 401  
Harrisburg, PA 17101

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 Derrick:

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

Set VI: Enron-VI-1, Enron-VI-2, Enron-VI-3, Enron-VI-4 and Enron-IV-6.

Sincerely,

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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Enron VI-4 Question:

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Identify the executive level employees with the following responsibilities:

- a. Supervision of the implementation and/or enforcement of the competitive safeguards/code of conduct to be applied to PECO's interaction with its unregulated generation supplier affiliate (Horizon) or any other entity or division PECO plans to create to market electric energy or other related services now provided by PECO Energy (i.e., metering and billing).
- b. Supervision of PECO's unregulated generation supplier affiliate or any other entity or division PECO plans to create to market electric energy (or other related services now provided by PECO Energy (i.e., metering and billing).

Enron VI - 1 Answer:

- a. Kenneth G. Lawrence
- b. Gregory A. Cucchi

Responsible Witness: G. A. Cucchi

**DOCKETED**  
AUG 11 1997

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Enron VI - 2 Question:

Identify every long term contract entered into by PECO with any customer after June 30, 1996, which binds the customer to continue to purchase generation supply from PECO after January 1, 1999. For each such contract, identify the following:

- a. The customer with whom the contract was entered;
- b. The date the contract was entered;
- c. The term for which the customer is bound to continue to purchase generation supply from PECO; and
- d. The amount of generation supply covered by the contract.

Enron VI - 2 Answer:

PECO objects to this request on the ground that it seeks information that is not relevant to this proceeding or to any testimony presented by PECO, and is not reasonably calculated to lead to the discovery of admissible evidence.

As the identity of customers with whom such contracts were entered is privileged information and cannot be released without customer authorization, PECO has prepared the following table covering the contracts dates, terms and supply amounts.

Customer	Date Contract Was Entered	Term for Which Customer Bound to Continue To Purchase Supply From PECO	Amount of Generation Supply Covered by Contract (in MW)
A	7/1/96	7/1/00	55
B	4/1/97	1/1/07	12
C	7/1/96	6/1/01	12
D	1/1/97	1/1/01	11
E	1/1/97	1/1/04	8
F	1/1/97	1/1/06	5
G	1/1/97	1/1/07	5

Responsible Witness: A. A. Miller

Enron VI - 3 Question:

With respect to the contracts identified in Interrogatory No. 2, identify and explain whether PECO or one of its affiliates will furnish the generation supply obligation to the customer after January 1, 1999 under the following scenarios:

- a. None of the customer's load qualifies to participate in the first phase of direct access;
- b. All of the customer's load qualifies to participate in the first phase of direct access; or
- c. A portion of the customer's load qualifies to participate in the first phase of direct access.

Enron VI - 3 Answer:

PECO will provide the generation supply after January 1, 1999 for all customer identified above under any of the three scenarios.

Responsible Witness: A. A. Miller

## Interrogatory Enron VI - 4

Enron VI - 4 Question:

Please identify:

- a. Energy One;
- b. How Energy One will work;
- c. PECO's investment and ownership interest in Energy One;
- d. PECO's working relationship and participation in Energy One.
- e. How PECO plans to market Energy One;
- f. What relationship will exist between PECO and AT&T under Energy One;
- g. What relationship will exist under Energy One between PECO and other regulated electric utilities;
- h. What relationship will exist under Energy One between PECO and any unregulated electric energy suppliers;
- i. What services PECO will furnish under Energy One as a regulated utility;
- j. What services PECO will furnish under Energy One as an unregulated supplier;
- k. What services unregulated affiliates of PECO Energy will furnish under Energy One, identifying the affiliates and the services they will render;
- l. How PECO Energy will separate the services it provides under Energy One from the electric generation supply services provided by its affiliates.

Enron VI - 4 Answer:

- a. Energy One is a limited liability company ("LLC") organized under the laws of the State of Delaware with headquarters located in Kansas City, Mo. It is also the name of an "umbrella" product and service brand.
- b. Energy One LLC will work as a franchiser, selling non-exclusive franchises to utilize its marks and logos and to have access to its products and services.
- c. PECO has a 50% ownership interest in the Energy One LLC. PECO and the other owner have obligated themselves to invest a total of \$22 million initial capital in the LLC.
- d. PECO has executed a distributor agreement (non-exclusive franchise) with the LLC under which it will have access to use the Energy One marks and logos and to sell Energy One branded products and services. These will be offered by an unregulated company affiliate(s). As a 50% owner of the LLC, PECO has two voter members on the LLC management committee. Because other utilities who join Energy One will execute separate franchise agreements with the LLC and the LLC is an independent company, PECO will have no direct relationship with other regulated utilities as a result of its participation in the Energy One LLC and its execution of a distributor (franchise) agreement.
- e. PECO has agreed to use the Energy One brand on the sale of commodity energy and any sale of Energy One branded products and services to its residential and small commercial customers in Southeastern Pennsylvania. The Energy One brand will be used in accordance with brand use and standards to be issued by the Energy One LLC. PECO plans to market Energy One products and services through a variety of channels, including direct mail, telemarketing, and general advertising.
- f. PECO has not yet received the legal terms and conditions that would govern its relationship with AT&T under Energy One.

Interrogatory Enron VI-4 (continued)

- g. As set forth in d. above, PECO will have no direct relationship with other regulated utilities under Energy One as an owner of the LLC or as a franchised distributor. However, it is possible in the future that the LLC will contract with PECO or a PECO affiliate to provide products and services to other franchised distributors under the Energy One brand.
- h. PECO will have no direct relationship with any unregulated electric generation suppliers under Energy One as an owner of the LLC or as a franchised distributor. However, it is possible in the future that the LLC will contract with PECO or a PECO affiliate to provide products and services to other franchised distributors under the Energy One brand.
- i. PECO has not yet committed to offer any specific Energy One services as a regulated utility. A list of services Energy One plans to offer is attached as Exhibit 1.
- j. PECO has not yet committed to offer any specific Energy One services as a unregulated supplier. A list of services Energy One plans to offer is attached as Exhibit 1.
- k. See j. Above. If PECO Energy elects to offer Energy One services through an unregulated affiliate, that affiliate's name is Horizon Energy Company.

Charges for Energy One products and services will be included on one bill for the customer.

Responsible Witness: T. P. Hill, Jr.

EnergyOne  
Near Term Planned Products

Call center support services  
New product billing services  
Surge protect/ Power Quality Devices  
Appliance warranty  
Commercial security  
Telecommunications  
    Long distance  
    Internet  
    Paging

Home security  
Fire and smoke protection  
Appliance control  
Personal alert security devices  
Multi-site billing analysis  
Smart thermostats  
Appliance control

## Interrogatory Enron VI - 6

## Enron VI - 6 Question:

Please provide a chart that shows how PECO Energy and any of its divisions and/or affiliates propose to provide generation, transmission and distribution services to customers and to market such services on an unregulated, competition supplier basis:

- a. After January 1, 1999, distinguishing between those customers that have the opportunity for direct access and those that do not;
- b. After January 1, 1999, distinguishing among:
  - (i) those customers that have the opportunity for direct access and choose competitive suppliers;
  - (ii) those customers that have such opportunity and choose an affiliate of PECO to provide electric generation supply;
  - (iii) those customers that have such opportunity and do not make any choice;
  - (iv) those customers that have such opportunity and choose to remain with PECO; and
  - (v) any other category of customers not included in (i) through (iv).
- c. After January 1, 2001, distinguishing among :
  - (i) those customers that choose competitive suppliers;
  - (ii) those customers that choose an affiliate of PECO to provide electric generation supply;
  - (iii) those customers that do not choose an alternative supplier;
  - (iv) those customers that choose to remain with PECO;
  - (v) those customers that contract with alternative suppliers for electric energy that is not delivered;
  - (vi) those customers that choose alternative suppliers and subsequently desire to return to PECO; and
  - (vii) any other category of customers not included in (i) through (vi).

## Enron VI - 6 Answer:

Transmission and Distribution Service. Starting January 1, 1999, PECO will provide unbundled distribution service to all customers regardless of their phase-in status or supplier.

PECO's expectation is that the Pennsylvania-New Jersey-Maryland Interconnection (PJM) will provide transmission service to PECO, competitive energy suppliers (including Horizon Energy Company and any other unregulated PECO competitive supply group or division), and to any end-use customers that can qualify to obtain transmission service directly under the PJM Open Access Tariff. For customers that remain with or return to PECO - i.e., for customers that are not supplied by a competitive supplier whether affiliated with PECO or not - PECO will obtain the necessary transmission service from PJM. For customers with competitive energy supply, either they or their suppliers will be responsible for obtaining from PJM the necessary transmission service. See the rebuttal testimony of David J. Pratzon for a more thorough explanation of retail transmission service.

Energy Supply. Starting January 1, 1999, PECO will provided unbundled energy supply to: (1) customers that do not yet have access to competitive supply during the phase-in; (2) customers that have access but choose not to obtain competitive supply; and (3) customers that return to PECO after having obtained competitive supply. Customers that choose a competitive supplier, whether affiliated with PECO or not, will by definition obtain service from the competitive supplier. Following January 1, 2001, only (2) and (3) above will still apply as all customer then will have access to competitive supply.

Responsible Witnesses: G. A. Cucchi (energy), A. A. Miller (distribution), D. J. Pratzon (transmission),

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:

Enron's Interrogatories: Set VI: Enron-VI-1, Enron-VI-2, Enron-VI-3, Enron-VI-4 and Enron-IV-6.

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Charles Shields, Prosecutor  
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(Counsel for PAIEUG)

Christopher B. Craig, Esquire  
Democratic Committee on Appropriations  
Room 545, Main Capitol Building  
Harrisburg, PA 17120  
(Counsel for The Honorable Vincent J. Fumo)

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Alan Kohler, Esquire  
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Joel D. Newton, Esquire  
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John & Hengerer  
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*Paul Bonney/mso*

Paul R. Bonney  
Assistant General counsel  
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2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252

Dated: August 1, 1997



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

IN REPLY PLEASE  
REFER TO OUR FILE

August 1, 1997

In Re: R-00973953,  
R-00973953 C0001-C0007  
7

(See letter dated 06/25/97)

**PECO ENERGY COMPANY**

Application for approval of a Restructuring Plan and Consumer Education Program. *KJR*

**NOTICE**

This is to inform you that the **Initial and Further Hearings** now scheduled to be held on **Monday, August 4, 1997 through Friday, August 15, 1997 at 10:00 a.m. in Philadelphia, Pennsylvania** as well as the **Public Input Hearing** scheduled to be held on **Wednesday, August 13, 1997 at 7:00 p.m. at the Arch Street United Methodist Church** have been **continued to a date to be determined.**

Presiding Officers: **Administrative Law Judge Marlane R. Chestnut**  
**Administrative Law Judge Charles E. Rainey, Jr.**  
1302 Philadelphia State Office Building  
Broad and Spring Garden Streets  
Philadelphia, Pennsylvania 19130  
Telephone (215) 560-2105

Please mark your records accordingly.

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**AUG 04 1997**

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pc:

**Chairman Quain**

**Vice Chairman Bloom**

**Commission Hanger**

**Commissioner Rolka**

**Commissioner Brownell**

Judge Chestnut

Judge Rainey

Kevin Cadden - 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-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 4, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES \_\_\_ NO \_\_\_  
 Hearing held YES \_\_\_ NO   
 Testimony taken <sup>KJR</sup> YES \_\_\_ NO \_\_\_  
 Transcript due YES \_\_\_ NO \_\_\_  
 Hearing concluded YES \_\_\_ NO \_\_\_  
 Further hearing needed YES \_\_\_ NO \_\_\_  
 Estimated add'l days \_\_\_\_\_  
 RECORD CLOSED YES \_\_\_ NO \_\_\_

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Briefs to be Filed DATE \_\_\_\_\_  
 YES \_\_\_ NO \_\_\_  
 BENCH DECISION DATE \_\_\_\_\_  
 YES \_\_\_ NO \_\_\_

REMARKS: *Hearing cancelled at request of parties*

NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD  
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NAME and TELEPHONE NUMBER	ADDRESS			APPEARING FOR
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**APPEARANCE SHEET**

**ALJ HEARING REPORT**

Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 5, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

CHECK THOSE BLOCKS WHICH APPLY:

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

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REMARKS: *Hearings cancelled at the request of the parties*

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

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REPLY TO

12TH DISTRICT  
STEWART J. GREENLEAF  
27 NORTH YORK ROAD  
WILLOW GROVE, PA 19090-3419  
(215) 657-7700

SENATE BOX 203012  
THE STATE CAPITOL  
HARRISBURG, PA 17120-3012  
(717) 787-6599



Senate of Pennsylvania

COMMITTEES

JUDICIARY, CHAIRMAN  
LAW AND JUSTICE, VICE CHAIRMAN  
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James McNulty, Acting Secretary  
Pennsylvania Public Utility Commission  
Room G-23 North Office Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

August 6, 1997

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R-00973953

Dear Mr. McNulty:

Please allow me the opportunity to share with you my impressions of the PECO Energy Co., based on my dealings with it under the leadership of Joseph Paquette and Corbin McNeill, who, I believe, have had a significant and positive effect on its operations.

Most of the interaction with my office centers around community concerns and constituent problems. I have found PECO to be both responsive and responsible in addressing issues, whether it be a neighborhood concern over tree-cutting, a senior citizen facing unpaid utility bills, a need for emergency service, or power outages affecting multiple municipalities.

A recent example was PECO's cooperation and diligence in restoring power to flood-ravaged neighborhoods in Abington Township. The company was quick to respond with emergency generators to prevent injury and looting, and assigned a staff member to work full time on the needs of the community. PECO was an active participant in emergency management and planning meetings and was persistent in pursuing solutions to the problems raised.

Over the past few years, I have found PECO to be extremely helpful, as well, when the problems of an individual or family were brought to its attention. Staff members have always been professional when dealing with homeowner problems relating to service, billing or outages, yet considerate and compassionate when the situation warranted it. I can recall a number of occasions when company representatives went beyond customary procedures to handle special situations.

I have every reason to believe that the company will maintain this level of service and I look forward to its continued cooperation in addressing customer needs.

Sincerely,

*Stewart J. Greenleaf*  
Stewart J. Greenleaf

SJG/rf

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SEP 11 1997

KJ

**APPEARANCE SHEET**

**ALJ HEARING REPORT**

Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 6, 1997  
 ALJ Chestnut & Rainey

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES  NO   
 Hearing held YES  NO   
 Testimony taken KJR YES  NO   
 Transcript due YES  NO   
 Hearing concluded YES  NO   
 Further hearing needed YES  NO   
 Estimated add'l days \_\_\_\_\_

Reporting Firm \_\_\_\_\_

RECORD CLOSED YES  NO   
 DATE \_\_\_\_\_  
 Briefs to be Filed YES  NO   
 DATE \_\_\_\_\_  
 BENCH DECISION YES  NO

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REMARKS: Hearing cancelled  
at parties' request

NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD  
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NAME and TELEPHONE NUMBER	ADDRESS			APPEARING FOR
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Telephone No.	City	State	Zip	PROTHONOTARY'S OFFICE 97 AUG 20 AM 9:16 PA PUC
Telephone No.	City	State	Zip	

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**APPEARANCE SHEET**

**ALJ HEARING REPORT**

KJR

Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 7, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES \_\_\_ NO \_\_\_  
 Hearing held YES \_\_\_ NO   
 Testimony taken YES \_\_\_ NO \_\_\_  
 Transcript due YES \_\_\_ NO \_\_\_  
 Hearing concluded YES \_\_\_ NO \_\_\_  
 Further hearing needed YES \_\_\_ NO \_\_\_  
 Estimated add'l days \_\_\_\_\_  
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August 8, 1997

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

**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**

00  
76

Dear Paul:

Enclosed are supplemental responses of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Set II, Nos. 13 and 17.

Very truly yours,

McNEES, WALLACE & NURICK

By   
Derrick P. Williamson

97 AUG 11 PM 1:13  
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DPW/jb

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

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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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Mr. Richard LaCapra  
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333 Washington Street  
Boston, MA 02108

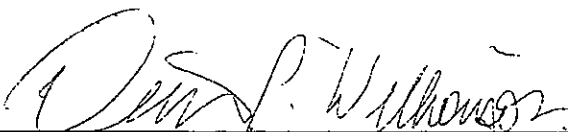
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Harrisburg, PA 17108-1166



Derrick P. Williamson

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

**APPEARANCE SHEET**

**ALJ HEARING REPORT**

KJR

Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 8, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

CHECK THOSE BLOCKS WHICH APPLY:

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

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REMARKS: *Hearing cancelled at parties request*

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**APPEARANCE SHEET**

**ALJ HEARING REPORT**

Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 11, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

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Prehearing held YES \_\_\_ NO \_\_\_  
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Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 12, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

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Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
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 ALJ Chestnut & Rainey  
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Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 14, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

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**ALJ HEARING REPORT**

Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 13, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

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Docket No. R-00973953  
R-00973953C0001-C0007  
 Case Name Pennsylvania Public Utility  
Commission v. PECO Energy Company  
 Location Philadelphia  
 Date August 15, 1997  
 ALJ Chestnut & Rainey  
 Reporting Firm \_\_\_\_\_

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Dawn Getty Sutphin  
Noel H. Trask  
Ronald L. Zack  
Assistant General Counsel

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August 12, 1997

**By Overnight Delivery**  
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100 North Tenth Street  
Harrisburg, PA 17101

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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 Ms. Miller:

Enclosed are PECO Energy Company's Answers to Mid Atlantic Power Supply  
Association's Interrogatories:

Set I: MAPSA-I-TPH 2, MAPSA-I-AAM 6 & 7, MAPSA-I-JFB 1-8 and MAPSA-I-  
WFS 7

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

Sincerely,

Paul Bonney

DOCKETED

AUG 14 1997

PRB/mbo  
Enclosures

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

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:

Mid Atlantic Power Supply Association's Interrogatories: Set I: MAPSA-I-TPH 2, MAPSA-I-AAM 6 & 7, MAPSA-I-JFB 1-8 and MAPSA-I-WFS 7

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(Counsel for PAIEUG)

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(Counsel for Enron)

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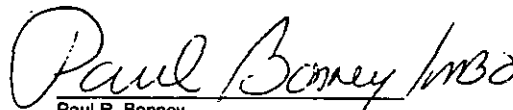
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