



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 26, 1997

**By Fax and First Class Mail**

MEMO

David Kleppinger, Esq.  
Derrick P. Williamson, Esq.  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

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

Dear Counsel:

Enclosed are two copies of PECO Energy Company's Interrogatories to the  
Philadelphia Area Industrial Energy Users Group, Set III, numbered 1 through 9.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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## INSTRUCTIONS

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Discovery Requests is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Discovery Request.

C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

(i) the date the information was first created or recorded;

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D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### **DEFINITIONS**

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

C. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
4. identify all other persons present at the time it was made;
5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
6. describe the substance of the oral communication or statement.

J. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

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FOLDER

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JUL 09 1997

PECO ENERGY COMPANY  
DOCKET NO. R-00973953  
INTERROGATORIES AND DOCUMENT REQUESTS  
TO PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP  
SET III

With respect to the testimony of witness Stephen J. Baron.

1. With reference to page 26, lines 5-14, identify those factors on which Mr. Baron believes the Commission could rely to deny PECO an extension of the CTC recovery period assuming his proposed CTC revenue requirement and rate design are adopted by the Commission.
2. With reference to pages 36-38, please state whether Mr. Baron has conducted any analyses or investigations of PECO's A&G functions and activities to determine which of these functions and activities will still continue, and/or the extent to which they will continue, when all customers may choose their electric generation supplier. Produce all such analyses or investigations and any and all documents relating to them.
3. If PECO continues to incur the same level of A&G expenses that it does today after 1/1/2001 (when all customers have choice), and the reason is that all underlying A&G functions must still be performed at the same level to carry out essential distribution and related functions (e.g., payroll, accounting, legal), is it Mr. Baron's contention that PECO not be allowed to recover all such prudently incurred costs?
4. With respect to PECO's common plant costs, please state whether Mr. Baron has conducted any analyses or investigations to determine whether such costs will decrease after 1/1/2001 (when all customers have choice), and if so produce all such analyses and investigations and any and all documents relating to them.
5. Produce all "similar analyses performed for each rate schedule" referenced at page 44, lines 13-14.
6. Produce all workpapers and spreadsheets on diskette relating to Mr. Baron's development of revenue requirements and unbundled rates.
7. State whether Mr. Baron contends that LILR customers cause none of the fixed and variable costs associated with PECO's baseload and intermediate units. If your answer is that Mr. Baron believes that they cause some of these costs, then state the level and the basis for the claimed level.
8. With reference to page 51, lines 4-12, is Mr. Baron contending that for EER customers, discount factors should be applied to: (1) the transmission, distribution, and CTC charges that an EER customer would pay, or (2) just to the CTC charges, or

(3) in some other fashion? Please explain, and provide an example of how Mr. Baron would recommend that PECO unbundle an EER contract. Assume, for purposes of preparing the example, that the customer receives an overall average discount of 20%, and that to achieve this discount under the current bundled Rate HT, a factor equal to 0.78 is currently applied to the current Rate HT capacity charge and first two energy blocks.

9. Does Mr. Baron contend that an EER customer should be entitled to discounts on the unbundled T&D components indefinitely, or just for the remaining term of the customer's current EER contract?

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)  
86890

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Liipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

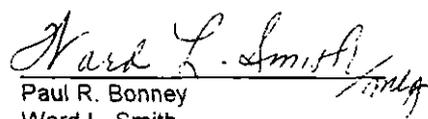
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)

  
Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 26, 1997



# PECO ENERGY

Legal Department

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

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Direct Dial: 215 841 4252

June 26, 1997

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Noel H. Trask  
Assistant General Counsel

**By Fax and First Class Mail**

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112

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

MEM

003504

Dear Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories to Environmentalists, Set IV.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**PECO ENERGY COMPANY  
DOCKET NO. R-00973953  
INTERROGATORIES AND DOCUMENT REQUESTS  
TO Environmentalists  
SET IV**

With regard to the testimony of David Schoengold:

1. Please provide all workpapers and spreadsheets (preferably on diskette) relating to the calculations summarized in Exhibit DS-2.

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)  
86890

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Liipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

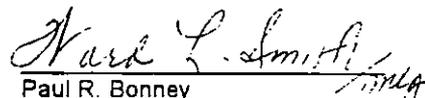
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)

  
Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 26, 1997



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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  
Rosalyn G. Pollack  
Christine A. Reuther  
Wendy Schermer  
Susan E. Sciamanna  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

## DOCUMENT FOLDER

Direct Dial: 215 841 4252

June 26, 1997

### By Fax and First Class Mail

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

03506

Dear Tanya:

Enclosed are two copies of PECO Energy Company's Interrogatories to Office of  
Consumer Advocate, Set III, numbered 1 through 7.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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**INSTRUCTIONS**

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Discovery Requests is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Discovery Request.

C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

RECEIVED  
PROTHONOTARY'S OFFICE  
97 JUN 30 AM 10:14

- (i) the date the information was first created or recorded;
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- (iii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### **DEFINITIONS**

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

C. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
4. identify all other persons present at the time it was made;
5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
6. describe the substance of the oral communication or statement.

J. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption: (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption: and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

DOCKETED

JUL 10 1997

DOCUMENT  
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PECO ENERGY COMPANY  
DOCKET NO. R-00973953  
INTERROGATORIES AND DOCUMENT REQUESTS  
TO THE OFFICE OF CONSUMER ADVOCATE  
SET III

With respect to the testimony of Lee Smith.

1. With reference to p. 5, lines 16-25, please state whether Ms. Smith has conducted any analyses or investigations of PECO's A&G functions and activities to determine which of these functions and activities will still continue, and/or the extent to which they will continue, when all customers may choose their electric generation supplier. Produce all such analyses or investigations and any and all documents relating to such studies.
2. If PECO continues to incur the same level of A&G expenses that it does today after 1/1/2001 (when all customers have choice), and the reason is that all underlying A&G functions must still be performed at the same level to carry out essential distribution and related functions (e.g., payroll, accounting, legal), is it Ms. Smith's contention that PECO not be allowed to recover all such prudently incurred costs?
3. With reference to page 5, lines 16-25, is it Ms. Smith's contention that when all customers have choice, PECO's A&G expenses are likely to decrease? Please provide all analyses or studies that concern or relate to the question whether PECO's A&G expense levels are likely to change following the end of the phase-in when all customers may choose their electric generation supplier.
4. Please provide any study, with supporting workpapers, conducted by you or available to you that supports the proposition that PECO Energy's A&G expenses are incurred by production, transmission, distribution or any other functions in proportion to the labor costs of those same functions.
5. With respect to PECO's common plant costs, please state whether Ms. Smith has conducted any analyses or investigations to determine whether such costs will decrease after 1/1/2001 (when all customers have choice), and if so produce all such analyses and investigations and any and all documents relating to them.
6. Is it Ms. Smith's position that throughout the period during which PECO charges a CTC, PECO should charge residential customers that do not choose another electric generation supplier for their electric energy at a rate equal to the "avoidable generation cost" (p. 9, lines 10-11) calculated in the manner set forth at page 9, lines 1-11? If the answer is yes, does Ms. Smith propose that such charges should be changed annually, or at some other time interval?
7. Produce all workpapers and spreadsheets on diskette relating to Ms. Smith's development of revenue requirements and unbundled rates.

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*.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)  
86890

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

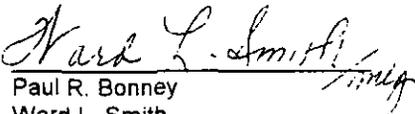
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)

  
Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 26, 1997



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna Waldron Gaston  
Gregory Golazeski  
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Jeffrey J. Norton  
Mark B. Peabody  
Rosalyn G. Pollack  
Christine A. Reuther  
Wendy Schermer  
Susan E. Sciamanna  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
*Assistant General Counsel*

Direct Dial: 215 841 4252

## DOCUMENT FOLDER

June 26, 1997

### By Fax and First Class Mail

Audrey VanDyke, Associate Counsel  
Naval Facilities Engineering command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, SE  
Washington, DC 20374-5018

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

003508

Dear Audrey:

Enclosed are two copies of PECO Energy Company's Interrogatories to  
Department of the Navy, Set III, numbered 1 through 5.

Sincerely,

*Ward L. Smith*  
mtg

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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INSTRUCTIONS

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

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- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

003509

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- (i) the date the information was first created or recorded;
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A. "You" refers to the company, agency, or organization to whom PECO has directed

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4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

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1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
4. identify all other persons present at the time it was made;
5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
6. describe the substance of the oral communication or statement.

J. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. **the** terms "and" and "or" mean "and/or";
2. **the** plural of a word includes the singular, and the singular includes the plural;
3. **the** past tense of verb includes the present, and the present tense includes the past;
4. **the** masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**PECO ENERGY COMPANY  
DOCKET NO. R-00973953  
INTERROGATORIES AND DOCUMENT REQUESTS  
TO THE NAVY  
SET III**

With respect to the testimony of Nicholas Phillips, Jr.

1. With reference to pp. 10-13, please state whether Mr. Phillips has conducted any analyses or investigations of PECO's A&G functions and activities to determine which of these functions and activities will still continue, and/or the extent to which they will continue, when all customers may choose their electric generation supplier. Produce all such analyses or investigations and any and all documents relating to such studies
2. If PECO continues to incur the same level of A&G expenses that it does today after 1/1/2001 (when all customers have choice), and the reason is that all underlying A&G functions must still be performed at the same level to carry out essential distribution and related functions (e.g., payroll, accounting, legal), is it Mr. Phillips' contention that PECO not be allowed to recover all such prudently incurred costs?
3. With reference to pages 10-11, is it Mr. Phillips' contention that when all customers have choice, PECO's A&G expenses are likely to decrease? Please provide all analyses or studies that concern or relate to the question whether PECO's A&G expense levels are likely to change following the end of the phase-in when all customers may choose their electric generation supplier.
4. With respect to PECO's common plant costs, please state whether Mr. Phillips has conducted any analyses or investigations to determine whether such costs will decrease after 1/1/2001 (when all customers have choice), and if so produce all such analyses and investigations and any and all documents relating to them.
5. Produce all workpapers and spreadsheets on diskette relating to Mr. Phillips' development of revenue requirements and unbundled rates.

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JUL 10 1997

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)  
86890

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

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

DOCUMENT  
FOLDER

Direct Dial: 215 841 4252

June 26, 1997

**By Fax and First Class Mail**

Kenneth L. Mickens, Senior Prosecutor  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
901 North 7<sup>th</sup> Street Rear  
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

MEMO

003610

Dear Ken:

Enclosed are two copies of PECO Energy Company's Interrogatories to Office of Trial Staff, Set II, numbered 1 through 4.

Sincerely,

*Ward L. Smith*  
mtg

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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PROTHONOTARY'S OFFICE  
97 JUN 30 AM 10:14

**INSTRUCTIONS**

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Discovery Requests is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Discovery Request.

C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

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97 JUN 30 AM 11:14

- (i) the date the information was first created or recorded;
- (ii) the last date on which the information was changed or altered in any manner; and
- (iii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### **DEFINITIONS**

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

C. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
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K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption: (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**PECO ENERGY COMPANY**  
**DOCKET NO. R-00973953**  
**INTERROGATORIES AND DOCUMENT REQUESTS**  
**TO Office of Trial Staff**  
**SET II**

With respect to the testimony of Mr. Paul J. Metro:

1. Please state whether Mr. Metro believes that costs should be allocated to customer classes based on the principle that a customer class should be responsible for the particular costs that it causes.
2. If it is Mr. Metro's contention that transmission and generation should be further unbundled into cost components, as it is for distribution (page 22, lines 6-7), please identify the cost components for these other functions as you have with distribution (Page 22, Line 6).
3. With reference to the testimony at page 24, line 7, please provide all studies, analyses, polls, or surveys that support, contradict, or otherwise relate to the contention that a bundled distribution charge will confuse ratepayers more than several unbundled distribution component charges.
4. Provide all studies and analyses that support, contradict, or otherwise relate to Mr. Metro's claim at page 30, lines 17-18, that the USFC "has the potential to increase by a factor of six (6) based on PECO's latest census data." Provide all workpapers (on diskette if available) that support, contradict, or otherwise relate to such studies, analyses, or the conclusions therein.

**DOCKETED**

**JUL 10 1997**

**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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

86890

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Liipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

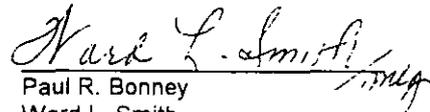
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)

  
Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 26, 1997



PECO ENERGY

Legal Department

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

DOCUMENT  
FOLDER

Direct Dial: 215 841 4252

June 26, 1997

James W. Durham  
Senior Vice President  
and General Counsel

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

By Fax and First Class Mail

William T. Hawke, Esquire  
Malatesta Hawke & McKeon LLP  
P.O. Box 1778  
Harrisburg, PA 17105-1778

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

MEM

003512

Dear Counsel:

Enclosed are two copies of PECO Energy Company's Interrogatories to the Mid-Atlantic Power Supply Association, Set II.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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INSTRUCTIONS

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

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C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

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- (i) the date the information was first created or recorded;
- (ii) the last date on which the information was changed or altered in any manner; and
- (iii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### **DEFINITIONS**

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

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D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
4. identify all other persons present at the time it was made;
5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
6. describe the substance of the oral communication or statement.

J. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**PECO ENERGY COMPANY  
DOCKET NO. R-00973953  
INTERROGATORIES AND DOCUMENT REQUESTS  
TO Mid-Atlantic Power Supply Association  
SET II**

- I. With respect to the testimony of Donald Johnstone, please produce all studies, analyses, and supporting workpapers prepared by Mr. Johnstone, and all studies and identify and produce all analyses of which Mr. Johnstone is aware, which concern or otherwise relate to the question whether PECO has vertical or horizontal market power.

**DOCUMENT  
FOLDER**

**DOCKETED**

**JUL 10 1997**

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

86890

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 219, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Lippfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

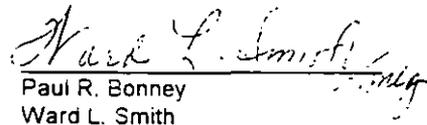
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)



Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 26, 1997



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

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

DOCUMENT  
FOLDER

Direct Dial: 215 841 4252

June 26, 1997

**By Fax and First Class Mail**

Daniel Clearfield, Esq.  
Alan Kohler, Esq.  
Wolf, Block, Schorr and Solis-Cohen  
305 N. 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

MEM

00351

Dear Dan and Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories to Enron  
Set VI, numbered 1 through 30.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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**INSTRUCTIONS**

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Discovery Requests is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Discovery Request.

C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

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- (i) the date the information was first created or recorded;
- (ii) the last date on which the information was changed or altered in any manner; and
- (iii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### DEFINITIONS

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

C. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
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4. his or her present or last known residence address (and the date of that last knowledge).

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L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

PECO ENERGY COMPANY  
DOCKET NO. R-00973953  
INTERROGATORIES AND DOCUMENT REQUESTS  
TO ENRON  
SET VI

DOCKETED

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With respect to the testimony of witness Steven J. Kean:

1. With reference to the testimony of Mr. Kean, p. 6, lines 2-5, does Enron contend that PECO should not be the supplier of last resort during the phase-in and transition periods? If so, how does Enron propose to ensure universal service? If not, is Enron suggesting that it is willing to be the supplier of last resort, and if so, on what terms and conditions?
2. With reference to the testimony of Mr. Kean, p. 6, line 16, please identify all "other competing business lines."

With respect to the testimony of witness Michael D. Dirmeier:

3. Identify all proceedings in which Mr. Dirmeier has testified with regard to the following and produce copies of all testimony sponsored by Mr. Dirmeier with respect to the following:
  - A. Code of Conduct;
  - B. Allocation of costs to competitive business conducted by utility divisions, groups, or affiliates;
  - C. Cross-subsidization of competitive businesses by ratepayers of regulated businesses;
  - D. The permissibility of, and rules governing, the activities of competitive business operated by affiliates, groups or divisions in regulated industries, including, but not limited to, the natural gas and telecommunications industries

If any testimony responsive to this question has been provided in response to previous interrogatories, please specifically identify the responsive documents that were previously provided, but you need not provide an additional copy of the document.

4. Please prepare and produce the actual Code of Conduct that Mr. Dirmeier would propose the Commission adopt that contains the "specific" and "concrete" details regarding what "utilities and their affiliates can and cannot do" (p. 10, line 21)
5. Provide all analyses and studies prepared or relied on by Mr. Dirmeier that supports Mr. Dirmeier's claim that PECO has "market power." (p. 11, line 5).
6. With reference to the testimony at p. 13, lines 14-21, explain why Mr. Dirmeier contends it is necessary for all affiliates to be subject to a Code of Conduct rather than only those affiliates that operate or control the EDC. Does Mr. Dirmeier disagree that the Code of Conduct should only apply to the entity that controls the "wires," or, using Mr. Dirmeier's phrase, the utility's "bottleneck" facilities?
7. Please identify with specificity the meaning of the phrase, "as separate as possible," as used at p. 14, line 7 – that is, explain in detail the precise meaning and content of Mr. Dirmeier's proposal to separate "services, money, information, and anything else." (p. 15, lines 8-9).
8. With reference to the testimony at p. 22, lines 13-17, what is the basis or rationale for Mr. Dirmeier's stated view that PECO affiliates should not be allowed to use the PECO name without compensation?
9. Is it Mr. Dirmeier's view that Enron Power Marketing Inc. should not be allowed to use the name "Enron" because EPMI is affiliated with Enron's regulated natural gas pipeline operations?
10. Is it Mr. Dirmeier's view that EPMI or Enron's competitive natural gas marketing operations should compensate Enron's regulated natural gas pipeline operations for the value of the Enron name?
11. With reference to the testimony at pp. 31-32, is Mr. Dirmeier's position that there is no information of any kind at all that an employee of the EDC communicates to an employee of a competitive generation division or affiliate that need not be conveyed to suppliers at the same time and in the same manner? Does Mr. Dirmeier mean to suggest that an EDC may not allow an employee to talk to an employee of a competitive affiliate or division without making available on the Internet a transcript of each such conversation? If Mr. Dirmeier's views are misstated in this interrogatory, please explain in detail the specific types of information that he believes may not be disclosed and the types of information that may be disclosed to a competitive affiliate or division
12. With respect to the testimony at page 34, lines 20-21, please identify in detail and with specificity the rules that you contend the Commission should impose to protect against

the "derogation of the right of electric generation suppliers or end-users to direct access."

13. With respect to the testimony at pages 36-37, please state whether it is Mr. Dirmeier's contention or belief that EPMI or any other Enron affiliate is unable to offer a contract to a customer located in PECO's service territory with an effective date before 1/1/99?
14. If the answer to the preceding question is no, please identify and produce copies of all proposals or contracts made by EPMI, Enron, or any other Enron affiliate to a customer located within PECO's service territory that includes the sale of electricity as part of the proposal or contract the term of which includes any portion of the period 12/3/96 through the date of your answers to this interrogatory.
15. Please provide a copy of the contract between Amtrak and Enron.
16. With respect to the testimony at page 37, lines 17, please state whether the "unbundled delivery service elements" includes the CTC/ITC charges.
17. Please state whether the Enron affiliate that owns, controls, or operates Enron's regulated natural gas pipeline operations maintains such a "contact log" showing all contacts made by such affiliate with Enron's natural gas marketing affiliate or affiliates and with customers of unregulated natural gas supply.

With respect to the testimony of Paul D. Reising:

18. Produce all workpapers and spreadsheets on diskette relating to Mr. Reising's Exhibit 3, PDR-2 through PDR-6, including an electronic spreadhseet version of the Functional Cost of Service Study that is Exhibit 3.
19. With reference to page 2, lines 18-20, and p. 12, lines 7-10, please state whether Mr. Reising has conducted any analyses or investigations of PECO's A&G functions and activities to determine which of these functions and activities will still continue, and/or the extent to which they will continue, when all customers may choose their electric generation supplier. Produce all such analyses or investigations and any and all documents relating to them.
20. If PECO continues to incur the same level of A&G expenses that it does today after 1/1/2001 (when all customers have choice), and the reason is that all underlying A&G functions must still be performed at the same level to carry out essential distribution and related functions (e.g., payroll, accounting, legal), is it Mr. Reising's contention that PECO not be allowed to recover all such prudently incurred costs?
21. Please provide any study, with supporting workpapers, conducted by you or available to you that supports the proposition that PECO Energy's A&G expenses are incurred

by production, transmission, distribution or any other functions in proportion to the labor costs of those same functions.

22. With respect to PECO's common plant costs, please state whether Mr. Reising has conducted any studies, analyses or investigations to determine whether such costs will decrease after 1/1/2001 (when all customers have choice), and if so produce all such analyses and investigations and any and all documents and workpapers relating to them.
23. With reference to Exhibit 3, PDR-3, Schedule 1, Rate Design-Page 3. Please provide any studies performed by or available to you that evaluate the economic impact on the population of PECO Energy's service territory if your proposed total Single-Phase, Secondary Customer monthly charge of \$18.24 (including monthly charges for Energy Delivery and Revenue Cycle Services) were to replace the current fixed monthly customer charge of \$5.10 for Rate R customers.
24. Provide any analyses or studies that concern the question whether Mr. Reising's proposed redesign of "Energy Delivery Services" and "Revenue Cycle Services" rates comply with the rate cap provisions contained in the Competition Act. Provide all workpapers (on diskette if available) that support, contradict, or otherwise relate to such studies or analyses. If no such studies or analyses exist, please explain why Mr. Reising's proposed designs comply with those rate cap provisions.
25. Describe the reason or justification for Mr. Reising's proposal that the proposed "classes of service" for "Energy Delivery Services" and "Revenue Cycle Services" should produce a return equal to the system average rate of return.
26. With respect to the testimony at p. 31, lines 23-27 and p. 32 lines 32, is it Mr. Reising's contention that PECO will no longer need to provide customer information and assistance once all customers have direct access?
27. With respect to the testimony at pp. 15-16, does Mr. Reising agree that to the extent that suppliers do not choose to bill for their services, and PECO is required to do so, PECO will still incur uncollectible expense? If the answer is yes, does Mr. Reising agree that such expense, if prudently incurred, will be properly recoverable from PECO's "wires" services customers through regulated rates?
28. With respect to the testimony at p. 20, lines 1-3, , please provide all analyses or studies, with supporting workpapers, which support, contradict, or otherwise relate to the contention that PECO's transmission revenue requirement should be much less than the \$154.5 million revenue requirement used by PECO. Please provide an itemized reconciliation that shows discrepancies or differences between the \$154.5 million and the proposed \$125 million revenue requirement.

With respect to the testimony of Raymond W. Bowen, Jr.:

29. With reference to the testimony at page 18, lines 1-3, please provide all analyses, studies, polls, or surveys which support, contradict, or otherwise relate to the contention that PECO Energy's proposed random selection method for phase-in for residential customers will produce far less than the 33% allowed participation levels. Provide all workpapers (on diskette if available) that support, contradict, or otherwise relate to such studies, polls, analyses, surveys, or the conclusions therein.
  
30. With reference to the testimony at page 18, lines 19-21, please provide all analyses, studies, polls, or surveys which support, contradict, or otherwise relate to the contention that it is impractical for a supplier to serve only a portion of the load for commercial customers with loads below 200 kW. Provide all workpapers (on diskette if available) that support, contradict, or otherwise relate to such studies, polls, analyses, surveys, or the conclusions therein.

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
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Daniel Clearfield, Esquire  
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Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
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Donald A. Kaplan, Esquire  
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Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

86890

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

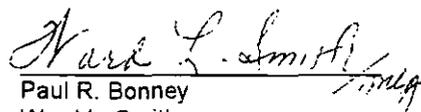
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)

  
Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 26, 1997



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Paul R. Bonnev  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna Waldron Gaston  
Gregory Golazeski  
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Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 26, 1997

**By Fax and First Class Mail**

DOCUMENT  
FOLDER

MEM

Joseph A. Dworetzky, Esquire  
John P. Lavell, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

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

003516

Dear Joe and John:

Enclosed are two copies of PECO Energy Company's Interrogatories to New  
Energy Ventures, Set II, numbered 1 through 3.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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**INSTRUCTIONS**

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Discovery Requests is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Discovery Request.

C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

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- (i) the date the information was first created or recorded;
- (ii) the last date on which the information was changed or altered in any manner; and
- (iii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### **DEFINITIONS**

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

C. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
4. identify all other persons present at the time it was made;
5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
6. describe the substance of the oral communication or statement.

J. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**PECO ENERGY COMPANY**  
**DOCKET NO. R-00973953**  
**INTERROGATORIES AND DOCUMENT REQUESTS**  
**TO NEW ENERGY VENTURES (NEV)**  
**SET II**

With respect to the testimony of witness David Boonin:

1. With reference to the testimony at page 21, lines 19-20 and at pages 21-22, lines 29, 1-2:
  - a) If PECO were to unbundle the HTC and LILR as suggested is it your contention you propose that PECO still provide the interruptible/curtailable discounts (i.e., PJM +1 cent and \$2.00/kW credit) even though PECO would no longer be able to interrupt/curtail the load ?
  - b) Explain why you believe PECO should provide a discount to customers through the HTC to "ease the burden on the system" if suppliers serve the generation load.
2. With reference to the testimony at page 21, lines 25-27, provide your justification for the statement that E2R2 was designed to use all of PECO's underutilized system more effectively, and not just PECO's generation.
3. With reference to the testimony at page 23, lines 9-16. provide all analyses (and supporting workpapers) that you performed or consulted that support, contradict, or otherwise relate to your the contention that a customer with three sites (3 meters) does not impose more distribution costs upon PECO than a customer with one site ( 1 meter).

**DOCKETED**

**JUL 10 1997**

**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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)  
86890

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

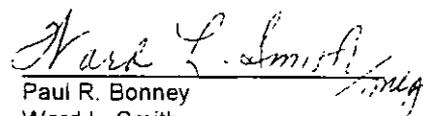
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)

  
Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 26, 1997



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna Waldron Gaston  
Gregory Golazeski  
John C. Halderman  
Mary McFall Hopper  
Stephen L. Huntoon  
Thomas G. Jackson  
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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**  
Tanya McCloskey  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Direct Dial: 215 841 4252

June 24, 1997

DOCUMENT  
FOLDER

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

003533

Dear Tanya:

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

Set XV: OCA-XV-4, OCA-XV-9, OCA-XV-23, OCA-XV-30, OCA-XV-33 and  
OCA-XV-38.

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)

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# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
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Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

DOCUMENT  
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- NT  
ER

Direct Dial: 215 841 4252

June 24, 1997

### 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 II: Enron-II-11, Enron-II-14, and Enron-II-15.

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)

003531

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# PECO ENERGY

Legal Department

PECO Energy Company  
2307 Market Street  
PO Box 8699  
Philadelphia, PA 19101-8699  
215 841 5544  
Fax 215 568 3389

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
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Susan E. Sciamanna Foehl  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

### By Overnight Delivery

Alan J. Barak, Esquire  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112

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 is PECO Energy Company's Answer to the Environmentalists  
Interrogatory:

Set II **Environmentalists-II-119 Revised.**

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)

003532

DOCUMENT  
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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-4, OCA-XV-9, OCA-XV-23, OCA-XV-30, OCA-XV-33 and OCA-XV-38.

Enron's Interrogatories: Set II: Enron-II-11, Enron-II-14, and Enron-II-15.

Environmentalists' Interrogatory: Set II Environmentalists-II-119 Revised.

Kenneth L. Mickens, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

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Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortetzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summit Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

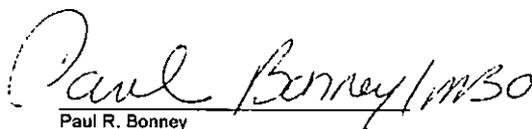
Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: June 24, 1997



**PECO ENERGY**

003649

Legal Department

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

MEM

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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

June 26, 1997

**By Overnight Delivery**

Christopher B. Craig, Esquire  
Democratic Committee on Appropriations  
Room 545, Main Capitol Building  
Harrisburg, PA 17120

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

Dear Mr. Craig:

Enclosed are PECO Energy Company's Answers to Senator Vincent J. Fumo's  
Interrogatories:

Set II FUMO-II -A through FUMO-II-I.

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

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

cc: w/enclosures  
Certificate of Service  
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:

Senator Vincent J. Furno's Interrogatories: Set II: FUMO-II -A through FUMO-II-I.

Kenneth L. Mickens, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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. Furno)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

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Assistant Consumer Advocate  
Office of Consumer Advocate  
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Harrisburg, PA 17120

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Assistant Small Business Advocate  
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300 N. 2<sup>nd</sup> Street  
Harrisburg, PA 17101

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

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Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

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305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
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Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

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Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortetzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summit Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
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Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

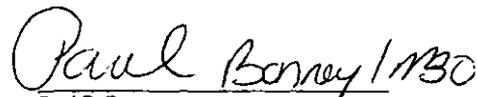
Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: June 26, 1997

LAW OFFICES  
WOLF, BLOCK, SCHORR AND SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING  
111 SOUTH 15TH STREET  
PHILADELPHIA, PA 19102-2678

003021  
(215) 977-2000  
FACSIMILE: (215) 977-2334

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DIRECT DIAL NUMBER:  
(215) 977-2118

June 26, 1997

**VIA HAND DELIVERY /FIRST CLASS MAIL**

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

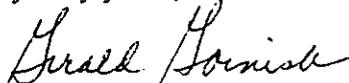
DOCUMENT  
FOLDER

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

Dear Ward:

Enclosed are Enron Power Marketing Inc.'s Answers to PECO's Set MP-I:1-22.

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

DSB:440907.1

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

57 JUL -1 PM 3:13

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

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PROT:00973953Y'S OFFICE  
Docket No: R-100973953

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Enron Power Marketing Inc.'s Answers to PECO's Set MP-I, Interrogatories 1-22 upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA HAND DELIVERY/FIRST CLASS MAIL

Ward L. Smith, Esquire  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103

VIA FIRST CLASS MAIL

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Comm.  
901 North 7th Street  
P.O. Box 3256  
Harrisburg, PA 17105-3265

David Kleppinger, Esquire  
Derrick Williamson, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Christopher B. Craig, Esq.  
Democratic Committee on Appropriations  
Room 545, Main Capitol Bldg.  
Harrisburg, PA 17120

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Paul-Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101

Alan Barak, Esquire  
Penn Energy Project  
Widener University School of Law  
3700 Vartan Way  
Harrisburg, PA 17110

Irwin Popowsky, Esquire  
Bernard A. Ryan, Esquire  
Office of Consumer Advocate  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Petter Meadows, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

Donald Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Ave., NW  
Washington, DC 20006-4759

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899

Roger Clark, Esquire  
NESIP 905 Denston Drive  
Ambler, PA 19002-3901

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer, Rebmann, Maxwell & Hippel, LLP  
204 State Street  
Harrisburg, PA 17101

David Boonin  
New Energy Venture  
200 South Broad Street, Suite 800  
Philadelphia, PA 19102

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102

Neil Talbot  
81 Grant Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summitt Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
225 S. Meramec Ave., Suite 720T  
St. Louis, MO 63105

Joel D. Newton, Esquire  
Verner, Liipfert, Bernhard, McPherson & Hand  
901 15th Street, N.W., #700  
Washington, DC 20005-2301

Michael G. Banta, Esquire  
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Indianapolis, Indiana 46204

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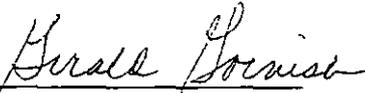
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Malatesta Hawke & McKeon  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778

Richard LaCapra  
Lee Smith  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Assoc., Inc.  
12510 Prosperity Drive, Suite 350  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
18 Tremont Street, Suite 400  
Boston, MA 02108

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

  
Gerald Gornish  
Gerald Gornish

Dated: June 26, 1997



**PECO ENERGY**

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
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Susan E. Sciamanna Foehl  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

**DOCUMENT  
FOLDER**

Direct Dial: 215 841 4252

June 26, 1997

**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**

003432

Dear Tanya:

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

Set XV: OCA-XV-5, OCA-XV-19, OCA-XV-21, OCA-XV-39 and OCA-XV-45.

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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LAW OFFICES  
WOLF, BLOCK, SCHORR AND SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING  
111 SOUTH 15TH STREET  
PHILADELPHIA, PA 19102-2678

(215) 977-2000  
FACSIMILE: (215) 977-2334

DIRECT DIAL NUMBER:  
(215) 977-2118

June 26, 1997

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JUN 26 1997  
WARD L. SMITH

VIA HAND DELIVERY /FIRST CLASS MAIL

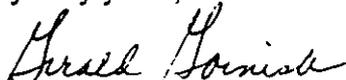
Ward L. Smith, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

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 are Enron Power Marketing Inc.'s Answers to PECO's Set MP-I:1-22.

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

DSB:440907.1

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 1 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 1.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding future natural gas prices.

(b) Identify and describe all assumptions regarding future natural gas prices that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. I (b).

(d) Produce all of the documents identified and/or described in Request No. I (b) and (c).

(e) State whether you have provided or set forth any assumptions regarding future natural gas prices in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 2 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 2.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding future oil prices.

(b) Identify and describe all assumptions regarding future oil prices that you intend to use in calculating stranded costs for PECO,

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 2(b).

(d) Produce all of the documents identified and/or described in Request No. 2(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding future oil prices in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 3 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 3.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding future coal prices.

(b) Identify and describe all assumptions regarding future coal prices that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 3 (b).

(d) Produce all of the documents identified and/or described in Request No. 3(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding future coal prices in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 4 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 4.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding future uranium prices,

(b) Identify and describe all assumptions regarding future uranium prices that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 4(b).

(d) Produce all of the documents identified and/or described in Request No. 4(b) and (c),

(e) State whether you have provided or set forth any assumptions regarding future uranium prices in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings, If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 5 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 5.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding future O&M costs.

(b) Identify and describe all assumptions regarding future O&M costs that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 5(b).

(d) Produce all of the documents identified and/or described in Request No. 5(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding future O&M costs in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 6 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 6.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding: (1) nuclear generating plant capacity factors; and/or (2) fossil generating plant availability factors.

(b) Identify and describe all assumptions regarding: (1) nuclear generating plant capacity factors; and/or (2) fossil generating plant availability factors that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 6(b).

(d) Produce all of the documents identified and/or described in Request No. 6(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding: (1) nuclear generating plant capacity factors; and/or (2) fossil generating plant availability factors in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO .7 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 7.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding: (1) load growth; and/or (2) capacity additions,

(b) Identify and describe all assumptions regarding: (1) load growth; and/or (2) capacity additions that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 7(b).

(d) Produce all of the documents identified and/or described in Request No. 7(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding: (1) load growth, and/or (2) capacity additions in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 8 DATED JUNE 17, 1997 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 8.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding reserve margins and/or reserve requirements.

(b) Identify and describe all assumptions regarding reserve margins and/or reserve requirements that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 8(b).

(d) Produce all of the documents identified and/or described in Request No. 8(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding reserve margins and/or reserve requirements in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings, If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any "assumptions" regarding the subject matter referenced in this interrogatory, as it understands that term. See Enron Statement No. 7, Direct Testimony of Lynn R. Coles, for comments on the referenced subject matter.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 9 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 9.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding future inflation and/or escalation factors.

(b) Identify and describe all assumptions regarding future inflation and/or escalation factors that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 9(b).

(d) Produce all of the documents identified and/or described in Request No. 9(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding future inflation and/or escalation factors in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 10 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 10.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding carrying the cost of capital and/or interest rates.

(b) Identify and describe all assumptions regarding carrying the cost of capital and/or interest rates that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 10(b).

(d) Produce all of the documents identified and/or described in Request No. 10(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding carrying the cost of capital and/or interest rates in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 11 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 11.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding future generating plant technology, including assumed heat rates.

(b) Identify and describe all assumptions regarding future generating plant technology, including assumed heat rates, that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 11(b).

(d) Produce all of the documents identified and/or described in Request No. 11(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding future generating plant technology, including assumed heat rates, in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings, If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 12 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 12** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding the cost of a new combined cycle and/or combustion turbine capacity.

(b) Identify and describe all assumptions regarding the cost of a new combined cycle and/or combustion turbine capacity that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 12(b).

(d) Produce all of the documents identified and/or described in Request No. 12(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding the cost of a new combined cycle and/or combustion turbine capacity in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings, If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 13 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 13.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding transmission constraints.

(b) Identify and describe all assumptions regarding transmission constraints that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 13(b).

(d) Produce all of the documents identified and/or described in Request No. 13(b) and (c).

(e) Identify and describe all transmission constraints that have been identified by you.

(f) Describe the frequency with which you believe any such transmission constraints actually would be triggered.

(g) State whether you have provided or set forth any assumptions regarding transmission constraints in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings, If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 14 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 14.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding the possible life extension of existing generating plant facilities.

(b) Identify and describe all assumptions regarding the possible life extension of existing generating plant facilities that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No, 14(b).

(d) Produce all of the documents identified and/or described in Request No. 14(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding the possible life extension of existing generating plant facilities in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 15 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 15.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding the cost of sulfur dioxide (SO<sub>2</sub>) emissions.

(b) Identify and describe all assumptions regarding the cost of sulfur dioxide emissions that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 15(b).

(d) Produce all of the documents identified and/or described in Request No. 15(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding the cost of sulfur dioxide emissions in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 16 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 16.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding the cost of nitrogen oxides (NO<sub>x</sub>) emissions.

(b) Identify and describe all assumptions regarding the cost of nitrous oxide emissions that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 16(b),

(d) Produce all of the documents identified and/or described in Request No. 16(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding the cost of nitrogen oxides emissions in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 17 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 17.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding availability and/or transmission of energy and capacity from other power pools and/or reliability councils to the PJM.

(b) Identify and describe all assumptions regarding the availability and/or transmission of energy and capacity from other power pools and/or reliability councils to the PJM that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 17(b).

(d) Produce all of the documents identified and/or described in Request No. 17(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding the availability and/or transmission of energy and capacity from other power pools and/or reliability councils to the PJM in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any "assumptions" regarding the subject matter referenced in this interrogatory, as it understands that term. See Enron Statement No. 7, Direct Testimony of Lynn R. Coles, for comments on the referenced subject matter.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 18 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 18.** (a) State whether you intend to sponsor any assumptions in the current proceedings regarding the availability and/or transmission of energy and capacity from the PJM to other power pools and/or reliability councils.

(b) Identify and describe all assumptions regarding the availability and/or transmission of energy and capacity from the PJM to other power pools and/or reliability councils that you intend to use in calculating stranded costs for PECO.

(c) Set forth the factual basis for all of the assumptions identified and described in Request No. 18(b),

(d) Produce all of the documents identified and/or described in Request No. 18(b) and (c).

(e) State whether you have provided or set forth any assumptions regarding the availability and/or transmission of energy and capacity from the PJM to other power pools and/or reliability councils in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 19 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 19.** (a) State whether you intend to sponsor any analytical model in the current proceedings to forecast: (1) annual electricity production; and/or (2) the annual market electricity price.

(b) Identify and describe the analytical model that you intend to use to forecast: (1) annual electricity production; and (2) the annual market electricity price in calculating stranded costs for PECO.

(c) Set forth the basis for your choice of the model identified and described in Request 19(b).

(d) Produce all of the documents identified and/or described in Request No. 19(b) and (c).

(e) State whether you have provided or set forth any analytical model used to forecast: (1) annual electricity production; and/or (2) the annual market electricity price in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such analytical model.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 20 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 20** (a) State whether you intend to forecast in the current proceedings the annual electricity production and/or the annual market electricity price.

(b) Identify and describe the time periods for which you intend to forecast annual electricity production and/or the annual market electricity price in calculating stranded costs for PECO.

(c) Set forth the basis for your choice of the time periods identified and described in Request 20(b),

(d) Produce all of the documents identified and/or described in Request No. 20(b) and (c).

(e) State whether you have provided or set forth any forecasts of annual electricity production and/or the annual market electricity price in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such assumptions.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 21 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 21** (a) State whether you intend to model any NERC region/subregion in the current proceedings.

(b) Identify and describe each NERC region/subregion that you intend to model in calculating stranded costs for PECO.

(c) Set forth the basis for your choice of the power pools identified and described in Request 21(b).

(d) Produce all of the documents identified and/or described in Request No. 21 (b) and (c).

(e) State whether you have attempted to model any NERC region/ subregion in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such models.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.

RESPONSE OF ENRON POWER MARKETING INC. TO SET MP-I, OF PECO ENERGY COMPANY, INTERROGATORY NO. 22 SUBMITTED IN DOCKET NO. R-00973953

**Request No. 22.** (a) State whether you intend to adopt and/or sponsor in the current proceedings any projected energy prices to derive the revenue of each generating unit in calculating the respective unit's stranded costs.

(b) Identify and describe the projected energy prices that you propose to use to derive each generating unit's revenue in calculating the respective unit's stranded costs for PECO.

(c) Set forth the basis for the projected energy prices identified and described in Request No. 22(b).

(d) Produce all of the documents identified and/or described in Request No. 22(c) and (d).

(e) State whether you have adopted and/or sponsored any projected energy prices used to derive the revenue of each generating unit in calculating the respective unit's stranded costs in any administrative or civil proceedings since January 1, 1990, with the exception of the current proceedings. If so, please produce all documents filed and/or produced in the prior proceedings which set forth such projected energy prices.

**Response:** Enron does not intend to sponsor any assumptions regarding the area referenced in this interrogatory.



**PECO ENERGY**

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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

**DOCUMENT  
FOLDER**

Direct Dial: 215 841 4252

June 26, 1997

**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

009733

Dear Derrick:

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

Set II: Enron-II-2 and Enron-II-17.

Sincerely,

*Paul Bonney / mbo*

Paul Bonney

PRB/mbo

Enclosures

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



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna Waldron Gaston  
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John C. Halderman  
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Christine A. Reuther  
Wendy Schermer  
Susan E. Sciamanna Foeht  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 26, 1997

## By Overnight Delivery

Alan J. Barak, Esquire  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112

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

003434

Dear Alan:

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

Set II Environmentalists-II-105, Environmentalists-II-106 and Environmentalists-II-107.

Set III Environmentalists-III-150, Environmentalists-III-174 through Environmentalists-III-177.

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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 Consumer Advocate's Interrogatories: Set XV: OCA-XV-5, OCA-XV-19, OCA-XV-21, OCA-XV-39 and OCA-XV-45..

Enron's Interrogatories: Set II: Enron-II-2 and Enron-II-17.

Environmentalists' Interrogatories: Set II Environmentalists-II-105, Environmentalists-II-106 and Environmentalists-II-107. Set III Environmentalists-III-150, Environmentalists-III-174 through Environmentalists-III-177.

Department of the Navy's Interrogatories: Set I Navy-I-8 Supplemental and Navy-I-22..

Kenneth L. Mickens, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

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Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortetzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Saltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summit Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: June 26, 1997



**PECO ENERGY**

**DOCUMENT  
FOLDER**

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
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. Shuibank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 26, 1997

**By Overnight Delivery**

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

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

003431

Dear Audrey:

Enclosed are PECO Energy Company's Answers to the Department of the  
Navy's Interrogatories:

Set I Navy-I-8 Supplemental and Navy-I-22.

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)

RECEIVED  
PROTHONOTARY'S OFFICE  
97 JUN 30 AM 9:43



# PECO ENERGY

Legal Department

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

DOCUMENT  
FOLDER

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
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Susan E. Sciamanna Foehl  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 25, 1997

**By Overnight Delivery**

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

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

003445

Dear Audrey:

Enclosed are PECO Energy Company's Answers to the Department of the  
Navy's Interrogatories:

Set I Navy-I-25, Navy-I-26 and Navy-I-30.

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)

RECEIVED  
PROTHONOTARY'S OFFICE  
97 JUN 30 AM 9:46



# PECO ENERGY

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
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Susan E. Sciamanna Foehl  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 25, 1997

DOCKETED

JUL 09 1997

**By Overnight Delivery**

Tanya McCloskey  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
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

003446

Dear Tanya:

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

Set XV: OCA-XV-16, OCA-XV-31, OCA-XV-36, OCA-XV-37, OCA-XV-41, OCA-  
XV-42, OCA-XV-44, OCA-XV-47 and OCA-XV-53.

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

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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-16, OCA-XV-31, OCA-XV-36, OCA-XV-37, OCA-XV-41, OCA-XV-42, OCA-XV-44, OCA-XV-47 and OCA-XV-53.

Department of the Navy's Interrogatories: Set I Navy-I-25, Navy-I-26 and Navy-I-30.

Kenneth L. Mickers, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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. Furno)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

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003447  
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PROTHOTARY'S OFFICE  
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Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortetzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summit Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: June 25, 1997

VERNER · LIPPERT  
BERNHARD · McPHERSON <sup>BY</sup> HAND  
[CHARTERED]

901 - 15TH STREET, N.W.  
WASHINGTON, D.C. 20005-2301  
(202) 371-6000  
FAX: (202) 371-6279

Joel D. Newton  
(202) 371-6197

DOCUMENT  
FOLDER

June 26, 1997

003438

MEM

VIA OVERNIGHT DELIVERY

Paul Bonney, Esq.  
PECO Energy Company  
Legal Department, 523-1  
2301 Market Street  
Philadelphia, PA 19101

97 JUN 30 AM 9:45  
RECEIVED  
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 Paul:

Enclosed are Allegheny Power's Answers to PECO Energy Company's  
Interrogatories Set MP-1: PECO-MP-1-1 through PECO-MP-1-22.

Sincerely,



Joel D. Newton

Enclosures

cc: All Parties (with enclosure)  
Certificate of Service  
James McNulty, Acting Prothonotary (Certificate of Service Only)

HOUSTON, TEXAS  
2600 TEXAS COMMERCE TOWER  
600 TRAVIS  
HOUSTON, TEXAS 77002  
(713) 223-7200  
FAX: (713) 237-1216

AUSTIN, TEXAS  
SAN JACINTO CENTER  
98 SAN JACINTO BLVD, SUITE 1440  
AUSTIN, TEXAS 78701  
(512) 703-6000  
FAX: (512) 703-6003

HONOLULU, HAWAII  
HAWAII TIMES BUILDING  
928 NUUANU AVE., SUITE 400  
HONOLULU, HAWAII 96817  
(808) 566-0999  
FAX: (808) 566-0995

McLEAN, VIRGINIA  
8280 GREENSBORO DRIVE  
SUITE 601  
McLEAN, VIRGINIA 22102  
(703) 749-6000  
FAX: (703) 749-6027

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

003439

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by first class or overnight/express  
mail upon the persons addressed below the following Answers to PECO Energy  
Company's Interrogatories Set MP-1: PECO-MP-1-1 through PECO-MP-1-22.

Paul R. Bonney  
Ward Smith  
Robin L. Krongold  
PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101

DOCKETED  
JUL 09 1997

Senator Vincent J. Fumo  
Chairman of Senate Democratic  
Committee on Appropriations  
Room 545  
Main Capitol Building  
Harrisburg, PA 17120

James D. Steffes  
ENRON Corp.  
1400 Smith Street  
P.O. Box 4428  
Houston, TX 77002

DOCUMENT  
FOLDER

Daniel Clearfield, Esq.  
Alan Kohler, Esq.  
Robert Longwell, Esq.  
Wolf, Block, Schorr and Solis-Cohen  
305 North Front Street, Suite 401  
Harrisburg, PA 17101

Craig A. Doll, Esq.  
214 State Street  
Harrisburg, PA 17101

Randall V. Griffin, Esq.  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899

James W. Durham  
Senior VP and General Counsel  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101-8699

Bernard Ryan, Esq.  
Karen Oill Moury, Esq.  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North 2nd Street  
Harrisburg, PA 17101

RECEIVED  
OFFICE OF THE  
CLERK OF THE  
COMMISSION  
JUL 30 AM 9:14

Kenneth Mickens  
Senior Prosecutor  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

David M. Boonin  
President, Mid-Atlantic  
New Energy Ventures, Inc.  
200 S. Broad Street, Suite 800  
Philadelphia, PA 19102

Walter W. Cohen, Esq.  
Andrew J. Giorgione, Esq.  
Obermayer Rebmann Maxwell Hippel, LLP  
204 State Street  
Harrisburg, PA 17102

Michael G. Banta, Esq.  
Vice President and  
Assistant General Counsel  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Alan J. Barak, Esq.  
Penn Energy Project  
Widener University School of Law  
3700 Vartan Way  
Harrisburg, PA 17110

Ernest E. Jones, Esq.  
1207 Chestnut Street  
7th Floor  
Philadelphia, PA 19107

Irwin Popowsky, Esq.  
Tanya McCloskey, Esq.  
Steven Steinmetz, Esq.  
Office of Consumer Advocate  
14th Floor, Strawberry Square  
Harrisburg, PA 17120

Steven P. Hershey, Esq.  
Petter Meadows, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

Paul Russell, Esq.  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

Donald A. Kaplan, Esq.  
Preston, Gates, et al.  
1735 New York Avenue, NW  
Washington, DC 20006-4759

David Kleppinger, Esq.  
McNees, Wallace & Nurick  
PO Box 1166  
Harrisburg, PA 17108-1166

W. Edwin Ogden, Esq.  
Alan Michael Seltzer, Esq.  
Ryan, Russell, Ogden & Seltzer  
1100 Berkshire Boulevard  
Suite 301  
Reading, PA 19610

Christopher B. Craig, Esq.  
Democratic Committee on Appropriations  
Room 545  
Main Capitol Building  
Harrisburg, PA 17120

Lance Haver  
6048 Ogontz Avenue  
Philadelphia, PA 19141

Angel L. Ortiz  
City Councilman  
City Hall - room 590  
Philadelphia, PA 19107

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

Richard LaCapra  
LaCapra Associates  
The Providence Building  
333 Washington Street  
Boston, MA 02108

William T. Hawke, Esq.  
Janet L. Miller, Esq.  
Todd S. Stewart, Esq.  
P.O. box 1778  
Harrisburg Energy Center  
Harrisburg, PA 17105-1778

The McFerren Corp.  
200 N. Third Street  
Suite 1100  
Harrisburg, PA 17101

Joseph A. Dworetzky, Esq.  
John P. Lavelle, Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square  
Twelfth Floor  
Philadelphia, PA 19103-6933

Bruce A. Connell, Esq.  
Dupont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Terrance FitzPatrick  
David DeSalle  
Ryan Russell Ogden & Seltzer  
800 N. Third Street  
Suite 101  
Harrisburg, PA 17102

Paul L. Zeigler, Esq.  
Zeigler & Zimmerman, PC  
344 N. 21st Street  
Suite 304  
PO Box 1080  
Camp Hill, PA 17011-3707

Linda C. Smith, Esq.  
Dilworth, Paxson, Kalish & Kauffman  
305 N. Front Street  
Suite 403  
Harrisburg, PA 17101-1236

Gary A. Jeffries, Esq.  
CNG Energy Services Corporation  
One Park Ridge Center  
PO Box 15746  
Pittsburgh, PA 15244-0746

Mr. Sam DeFrawi  
Director, Navy Rate Intervention  
Washington Navy Yard  
Building 212, Code 00RI  
901 M Street, S.E.  
Washington, DC 20374-5018

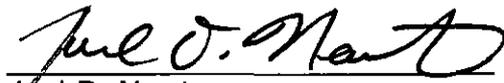
Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Meramec Avenue  
St. Louis, MO 63105

Michael L. Kessler  
Vice President & General Counsel  
American Energy Solutions, Inc.  
111 S. Alfred Street  
Alexandria, VA 22304

Audrey Van Dyke  
Associate Counsel (Litigation)  
Naval Facilities Engineering Command  
Washington Navy Yard  
Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Rufus L. Miley  
22 Leopard Run  
Glen Mills, PA 19342

Dated this 26th day of June, 1997.

  
Joel D. Newton  
Verner, Lipfert, Bernhard,  
McPherson and Hand  
901 15th Street, NW  
Suite 700  
Washington, DC 20005

Attorney for Allegheny Power

**JOHN & HENGERER**  
A LAW PARTNERSHIP  
1200 17TH STREET, N.W.  
SUITE 600  
WASHINGTON, D.C. 20036-3006

**ORIGINAL**

June 26, 1997

DOUGLAS F. JOHN  
EDWARD W. HENGERER  
KEVIN M. SWEENEY  
KIM M. CLARK  
GORDON J. SMITH  
SHELBY L. PROVENCHER

TELEPHONE  
202/429-8809

TELECOPIER  
202/429-8805

MEM

*Via Overnight Mail*

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

RECEIVED  
JUN 26 1997  
PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

**RE: Petition for Approval of Restructuring Plan (Docket No. R-00973953)**

Dear Sirs:

I've included for filing an original, 5 copies and 2 diskette copies of the Petition for Leave to Intervene and Participate of Vastar Power Marketing, Inc. in the above-referenced docket. Please return two stamped copies in the attached envelope for our records.

Thank you for your attention to this matter.

Sincerely,

  
Gordon Smith

Counsel For  
Vastar Power Marketing, Inc.

F:\word\213\pleading\pa-peco.11

DOCUMENT  
FOLDER

64

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PECO Energy Company for )  
Approval of its Restructuring Plan )

Docket No.  
R-00973953

PETITION FOR LEAVE TO INTERVENE AND PARTICIPATE OF  
VASTAR POWER MARKETING, INC.

This Petition for Leave to Intervene and Participate in the above-referenced proceeding is filed by Vastar Power Marketing, Inc. (Vastar) pursuant to the Public Utility Commission's (Commission) Rules of Procedure and Practice, 52 Pa. Code § 5.71, *et. seq.*, and the Prehearing Orders. Vastar requests that this Motion be granted for the reasons set forth below:

RECEIVED

JUN 26 1997

PA PUBLIC UTILITY COMMISSION  
PROTESTANT'S OFFICE

I.

Communications and correspondence concerning this Motion should be directed to:

Gordon J. Smith, Esq.  
JOHN & HENGERER  
1200 17<sup>th</sup> Street, N.W.  
Suite 600  
Washington, D.C. 20036-3006  
Telephone: (202) 429-8814  
Facsimile: (202) 429-8805

Norma J. Rosner, Esq.  
General Counsel  
VASTAR POWER MARKETING, INC.  
200 Westlake Park Boulevard  
Houston, TX 77079  
Telephone: (713) 548-3980

II.

Vastar is headquartered in Houston, Texas and is a subsidiary of Vastar Resources, Inc., which is a partially owned subsidiary of Atlantic Richfield Company, a Delaware Company. Vastar is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 200 Westlake Park Boulevard, Houston, TX 77079. Vastar — which received authorization from the Federal Energy Regulatory

DOCKETED  
JUL 07 1997

DOCUMENT  
FOLDER

Commission on October 26, 1995 to sell electricity at market-based rates<sup>1</sup> — markets electric power. Vastar intends to serve customers on PECO Energy Company's (PECO) distribution system and has significant interest in the Pennsylvania electricity market in general.

### III.

On January 24, 1997, the Commission issued an order directing PECO to file its restructuring plan. On April 1, 1997, PECO filed its restructuring plan.

### IV.

As a potential marketer of electricity to customers presently served in PECO's service territory, Vastar will be directly and specifically affected by the outcome of this proceeding. Vastar's interests in this proceeding cannot be adequately represented or protected by any other party hereto. Moreover, as a power marketer, Vastar likely can contribute to the development of a complete record in this case as well as settlement discussions. Under the circumstances, Vastar submits that good cause exists to grant it leave to intervene and participate herein.

At this early stage in the proceeding, Vastar does not have any testimony. Vastar wishes, however, to be considered an active party and reserves its right to participate in the hearings and file briefs as the Commission may subsequently allow, as well as in any settlement discussions.

---

<sup>1</sup> *Vastar Power Marketing, Inc.*, Docket No. ER95-1685, Letter Order dated October 26, 1995.

V.

WHEREFORE, Vastar requests that the Commission grant this Motion and that Vastar be made a party to this proceeding for all purposes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gordon J. Smith". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Gordon J. Smith, Esq.  
JOHN & HENGERER  
1200 17th Street, N.W.  
Suite 600  
Washington, D.C. 20036

Counsel for Vastar Power Marketing, Inc.

I hereby certify that I have this day served a true copy of the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Washington D.C.: June 26, 1997

COMMONWEALTH OF PENNSYLVANIA

**DATE:** June 27, 1997

**SUBJECT:** R-00973953  
R-00973954

KJR

**TO:** Office of Administrative Law Judge

**FROM:** *WJB* James J. McNulty, Deputy Prothonotary

P-00973953 APPLICATION OF PECO ENERGY COMPANY FOR  
APPROVAL OF RESTRUCTURING PLAN

P-00973954 APPLICATION OF PENNSYLVANIA POWER & LIGHT  
COMPANY FOR APPROVAL OF RESTRUCTURING PLAN

---

Attached is copy of a Petition to Intervene Out of Time of the Pennsylvania Retailers' Association (PRA) filed in connection with the above docketed proceedings.

This matter is assigned to your Office for appropriate action.

Attachment

cc: OTS

wjz

JUN 27 1997

DOCUMENT  
FOLDER

LAW OFFICES  
RYAN, RUSSELL, OGDEN & SELTZER LLP

SAMUEL B. RUSSELL  
W. EDWIN OGDEN  
ALAN MICHAEL SELTZER  
TERRANCE J. FITZPATRICK  
JEFFREY A. FRANKLIN  
JANET E. ARNOLD  
DAVID M. DESALLE

800 NORTH THIRD STREET  
SUITE 101  
HARRISBURG, PENNSYLVANIA 17102-2025

TELEPHONE: (717) 236-7714  
FACSIMILE: (717) 236-7816

HAROLD J. RYAN (1972)  
JOHN S. MCCONAGHY (1981)

READING OFFICE

1100 BERKSHIRE BOULEVARD  
SUITE 301  
READING, PENNSYLVANIA  
19610-1221  
TELEPHONE: (610) 372-4761  
FACSIMILE: (610) 372-4177

June 27, 1997

VIA HAND DELIVERY

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

DOCUMENT  
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PA.P.U.C.  
PROTHONOTARY'S OFFICE

KJR  
97 JUN 27 PM 2:24  
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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 1 MP-1, Questions 1-22 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

TJF/cc

Attachment

cc: All Parties of Record

BEFORE THE  
PUBLIC UTILITY COMMISSION

DOCUMENT  
FOLDER

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

DOCKETED

JUN 20 1997

CERTIFICATE OF SERVICE

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97 JUN 27 PM 2:24  
PA.P.U.C.  
PROTHONOTARY'S OFFICE

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-1, Questions 1-22 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:

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG,  
Action Alliance of Sr. Citizens &  
John Long, Jr.)

Paul Russell, Esquire  
Pennsylvania Power & Light  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Roger Clark, Esquire  
NESIP 905 Denston Drive  
Ambler, PA 19002-3901

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light  
One Monument Circle  
Indianapolis, IN 46206-1595

Andrew Van Dyke, Associate Counsel  
Naval Facilities, Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M. Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. Of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

John A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12th Floor  
Philadelphia, PA 19102

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Joseph J. Malatesta, Jr., Esquire  
Lilian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105

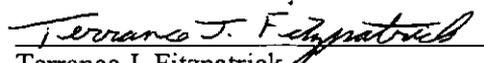
Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Assoc.)

Gary A. Jeffries, Senior Attorney  
CNG Energy Services Company  
One Park Ridge Center  
P.O. Box 15746  
Pittsburgh, PA 15244-07846  
(Counsel for CNG)

Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103

Janet Miller, Esquire  
William T. Hawke, Esquire  
Todd S. Stewart, Esquire  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply  
Association)

Dated: June 27, 1997

  
Terrance J. Fitzpatrick  
RYAN, RUSSELL, OGDEN & SELTZER LLP  
800 North Third Street, Suite 101  
Harrisburg, Pennsylvania 17102-2025  
(717) 236-7714

RECEIVED  
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PA.P.U.C.  
PROTHONOTARY'S OFFICE



# PECO ENERGY

Legal Department

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

DOCUMENT  
FOLDER

James W. Durham  
Senior Vice President  
and General Counsel

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

Direct Dial: 215 841 4252

June 27, 1997

## By Fax and First Class Mail

Kenneth L. Mickens, Senior Prosecutor  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
901 North 7<sup>th</sup> Street Rear  
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

003453

Dear Ken:

Enclosed are two copies of PECO Energy Company's Interrogatories to Office of  
Trial Staff, Set III, numbered 1 through 21.

Sincerely,

Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

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## INSTRUCTIONS

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Discovery Requests is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Discovery Request.

C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

(i) the date the information was first created or recorded;

(ii) the last date on which the information was changed or altered in any manner; and

(iii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### **DEFINITIONS**

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

C. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
4. identify all other persons present at the time it was made;
5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
6. describe the substance of the oral communication or statement.

J. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past;
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

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PECO Energy Company  
Docket No. R-09973953  
Interrogatories for  
Office of Trial Staff, Set III

DOCKETED  
JUL 09 1997

Witness Kevan L. Deardorff

1. Re: Page 29, lines 2 through 5 OTS Statement 2:
  - A. Please provide all empirical and academic evidence in Mr. Deardorff's possession or of which he is aware which supports his assertion that: "the increased price volatility inherent in this statistic is due primarily to the uncertainty surrounding the outcome of the current filings."
  - B. Please identify and describe the extent of the stranded investment exposure of the companies in Mr. Deardorff's barometer group of electric companies.
  - C. Please identify and describe the status of any filings regarding stranded investment for the company's in Mr. Deardorff's barometer group.
2. Re: Page 13, lines 4 and 5 of OTS Statement No. 2: Please identify and fully describe the factors which the financial markets take "into account when assessing investments."
3. Re: Page 13, lines 5 and 6 OTS Statement 2:
  - A. Please identify and fully describe the referenced "aggregate risks."
  - B. Please provide all empirical and academic evidence in Mr. Deardorff's possession or of which he is aware that these "aggregate risks are reflected in the stock price per share."
4. On page 12, lines 13 through 15 of OTS Statement No. 2, Mr. Deardorff states that "Based upon my analysis of the risk indicators for PECO Energy and the barometer group, I believe the barometer group is a very close representation of an electric utility with PECO Energy's characteristics." In light of that statement please provide a fully detailed explanation why the barometer group's average dividend yield decreased by 642 basis points since 1981 and PECO Energy's dividend yield declined by 858 basis points since 1981 as discussed by Mr. Deardorff on page 14, lines 17 through 19 of OTS Statement No. 2 and as shown on Schedule No. 4 of OTS Exhibit No. 2.

5. Re: Page 16, lines 12 through 15 of OTS Statement No. 2: Mr. Deardorff discusses "extended forecasts for the various interest rates presented" on Schedule No. 4 of OTS Exhibit No. 2. On Schedule No. 4, four sources of information are shown. Please identify which source/sources was/were used as the source/sources for the extended forecasts.
6. Re Page 19, lines 11 through 13 of OTS Statement no. 2, please provide all empirical and academic support in Mr. Deardorff's possession or of which he is aware which supports his assertion that PECO Energy's spot yield "is being overly influenced by the uncertainty surrounding the current filings."
7. Re: Page 19, lines 13 through 16 of OTS Statement 2:
  - A. Please provide all empirical evidence in Mr. Deardorff's possession or of which he is aware that growth forecasts for PECO Energy are overstated.
  - B. Mr. Deardorff uses the term "undervalued" in referenced to PECO Energy's stock price. Please fully define the term "undervalued" as it relates to stock prices.
8. Re: Page 22, lines 12 through 14 OTS Statement No. 2: Mr. Deardorff states that "Forecasting professionals have already accounted for historical data in their estimates along with expectations of a wide array of economic variables." Please identify the "economic variables" which constitutes this "wide array" and explain how "forecasting professionals" account for their expectations of these "economic variables."
9. Re: Page 23, lines 14 and 15 of OTS Statement No. 2: Please provide all empirical and academic evidence in Mr. Deardorff's possession or of which he is aware which supports his contention that "dividend growth is expected to be restrained in order to strengthen equity ratios" in the "transition to a competitive environment."
10. Re: Page 25, lines 1 and 2 of OTS Statement No. 2: Please provide all empirical and academic evidence in Mr. Deardorff's possession or of which he is aware which supports his belief "that dividend growth rates will be biased" until the transition to a competitive environment is complete for electric utilities.
11. Please provide a complete description of Standard & Poor's bond rating process.
12. Re: Page 32, lines 14 and 15 of OTS Statement No. 2: Please provide all empirical and academic evidence in Mr. Deardorff's possession or of which he is aware which supports his statement that "The increase in risk is only a short-term phenomenon."

13. Re: Page 34, lines 11 through 15 of OTS Statement No. 2: How does the comparison of CAPM and RP results aid an investor in making "rational buy and sell decision"? Please provide all empirical and academic support in Mr. Deardorff's possession or of which he is aware which supports his response.
14. Re: Page 34, lines 13 and 15 of OTS Statement No. 2: Please fully explain why "an investor would have an incentive to buy" if "expected DCF returns are higher than those indicated by the CAPM and RP historical norms." Please provide all empirical and academic support in Mr. Deardorff's possession or of which he is aware which support his response.
15. Re: Page 35, lines 10 through 12 of OTS Statement 2:
  - A. Please identify the referenced "variables" in line 11.
  - B. Please provide all empirical evidence and academic support that an "implicit assumption" of the CAPM and/or RP method of determining investors' required rate of return on common equity is "that the variable determining the equity cost rate and debt cost rate are the same."
16. Re: Page 36, lines 3 through 6 of OTS Statement 2:
  - A. Have Eugene F. Fama and/or Kenneth R. French written/published any articles subsequent to the article referenced in the New York Times on February 18, 1992? If your response is yes, please provide complete copies of such articles.
  - B. Have any articles been published, by other financial experts, in response to the Fama/French article referenced in the new York Times on February 18, 1992. If your response is yes, please provide complete copies of such articles.
  - C. Please provide a copy of any study performed by Mr. Deardorff or, if performed by other in his possession or of which he is aware which demonstrates that the DCR model does well "in predicting actual returns."
17. Re: Page 36, lines 16 through 18 that the CAPM model, specifically Mr. Brennan's application of the CAPM, relies upon a DCF calculation to determine common equity returns.
18. Re: Schedule No. 3 of OTS Exhibit No. 2: Please provide a copy of the original data from the referenced "Compustat Data base" used as a source for Schedule No. 3.

19. Re: Schedule No. 4 of OTS Exhibit No. 2:

- A. Please provide a copy of "Economic Indicators," May 1997 used as a source for Schedule No. 3.
- B. Please provide a copy of Mccody's Bond Record, May 1995 used as a source for Schedule No. 3.
- C. Please provide a copy of the original data from the referenced "Compustat Database" used as a source for Schedule No. 3.

20. Re: Pages 1 and 2, Schedule No. 5 of OTS Exhibit No. 2:

- A. Please provide a copy of Barron's, June 2, 1997, used as a source for pages 1 and 2 Schedule No. 5.
- B. Please provide the market prices and dividends for fifty-two (52) weeks ending May 30, 1997, or PECO Energy and each company in Mr. Deardorff's barometer group of electric companies.

21. To the extent not provided elsewhere, please provide a copy of all workpapers (hardcopy and electronic), source documents, publications, etc. used by Mr. Deardorff in the preparation of OTS Statement No. 2 and OTS Exhibit No. 2.

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)  
86890

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Lippert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

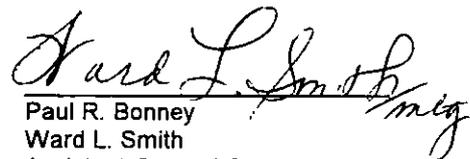
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)



Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 27, 1997



# PECO ENERGY

Legal Department

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

## DOCUMENT FOLDER

Direct Dial: 215 841 4252

June 27, 1997

James W. Durham  
Senior Vice President  
and General Counsel

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

### By Fax and First Class Mail

Audrey VanDyke, Associate Counsel  
Naval Facilities Engineering command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, SE  
Washington, DC 20374-5018

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

MEM

Dear Audrey:

Enclosed are two copies of PECO Energy Company's Interrogatories to  
Department of the Navy, Set IV, numbered 1 through 7.

Sincerely,

  
Paul Bonney  
Ward L. Smith

PRB/mtg

Enclosures

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

003451

RECEIVED  
PROTHONOTARY'S OFFICE  
97 JUN 30 AM 9:52

## INSTRUCTIONS

A. In answering these Interrogatories and Document Requests (collectively, the "Discovery Requests"), furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Discovery Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Discovery Requests is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Discovery Request.

C. If any matter responsive to any of the Discovery Requests is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the ground that such information is preliminary and/or still in draft form, set forth the following information:

- (i) the date the information was first created or recorded;
- (ii) the last date on which the information was changed or altered in any

manner; and

- (iii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Discovery Request is to be considered a separate Discovery Request for the purpose of Plaintiff's answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Discovery Requests are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For all documents produced, identify by Bates number which document or documents are responsive to each separate Discovery Request. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by Bates number or by describing the author(s), recipients(s), date of creation, and general description of the document. If you respond by stating that the requested information already has been produced in response to prior discovery requests or as part of your testimony, identify by date, specific page number(s), and general description the prior discovery responses or portions of testimony that are responsive.

### **DEFINITIONS**

A. "You" refers to the company, agency, or organization to whom PECO has directed

these Discovery Requests, and any agent, agency, or affiliate thereof.

B. "PECO" refers to the PECO Energy Company and any agent, agency, or affiliate thereof.

C. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

D. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

E. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letter; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the following documents is requested or referred to,

the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

F. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

G. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other *designation* and any other information (e.g., index or file number) which would facilitate the identification thereof;
4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriate identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Discovery Request or your response appears.

H. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Discovery Request (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

I. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;
4. identify all other persons present at the time it was made;
5. *if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and*
6. describe the substance of the oral communication or statement.

J. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

K. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

L. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which

constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person whom OCA knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

M. Where the context so requires:

1. **the terms "and" and "or" mean "and/or";**
2. **the plural of a word includes the singular, and the singular includes the plural;**
3. **the past tense of verb includes the present, and the present tense includes the past;**
4. **the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.**

O. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

DOCKETED

JUL 09 1997

PECO Energy Company  
Docket No. R-09973953  
Interrogatories for  
Department of the Navy, Set IV

DOCUMENT  
FOLDER

Witness John B. Legler

1. Re: Page 29, line:20 and 21 of the Direct Testimony of John B. Legler:
  - A. Please identify and fully describe the "circumstances" which "may exist such that a negative risk premium or well below average risk premium may be calculated."
  - B. What is the referenced "average risk premium"? Please provide all empirical and academic support in Dr. Legler's possession or of which he is aware to support his response.
2. Re: Page 31, lines 14 and 15 of the Direct Testimony of John B. Legler: Is the growth component of the DCF model presumed to be constant? Please provide all empirical and academic support in Dr. Legler's possession or of which he is aware to support his response.
3. Re: Page 31, lines 21 through 24 the Direct Testimony of John B. Legler: Please *identify and fully describe the referenced "contemporary institutional market factors"* and describe how they affect the relative risk of securities. Please provide all empirical and academic support in Dr. Legler's possession or of which he is aware to support his response.
4. Re: Page 39, lines 22 through 24 of the Direct Testimony of John B. Legler: Dr. Legler states "I know of no recent empirical tests which indicate that the beta of all stocks converge towards 1.0 . . ." Is Dr. Legler aware of such empirical tests which are not "recent"? If your response is yes, please provide copies of all such studies in Dr. Legler's possession or of which he is aware.
5. Re: Page 40, lines 2 and 3 of the Direct Testimony of John B. Legler: Please identify where the risk-free rate appears in the regression equation to estimate the beta of stock. Please provide all empirical and academic support in Dr. Legler's possession or of which he is aware to support his response.

6. Re: Schedule 1 of Exhibit \_\_ (JBL-1):

A. Please provide a copy of Standard & Poor's, *Stock Reports, NYSE*, February 1997, referenced as a source for Schedule 16.

B. Please provide a description of the methodologies used by Value Line Investment Survey and Standard & Poor's to estimate the betas shown on Schedule 16.

7. To the extent not provided elsewhere, please provide a copy of all workpapers (hardcopy and electronic), source documents, publications, etc. used by Dr. Legler in the preparation of his Direct Testimony and Exhibit \_\_ (JBL-1).

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEUG)

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

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens  
& John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esquire  
Verner Lippfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing))

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

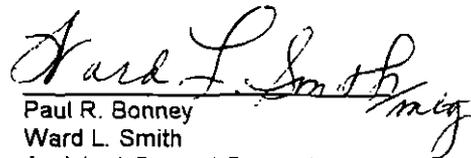
Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart, Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105  
(Municipal Group)

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum Association)



Paul R. Bonney  
Ward L. Smith  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-4252  
(215) 841-6863

Dated: June 27, 1997

ORIGINAL  
LAW OFFICES

DILWORTH, PAXSON, KALISH & KAUFFMAN LLP

305 N. FRONT STREET

SUITE 403

HARRISBURG, PENNSYLVANIA 17101-1236

(717) 236-4812 FAX (717) 236-7811

003033

PHILADELPHIA, PA

(215) 575-7000

MEDIA, PA

(610) 565-4131

CHERRY HILL, NJ  
(609) 751-8500

(717) 236-4812

June 26, 1997

James McNulty, Prothonotary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

RECEIVED  
PROTHONOTARY'S OFFICE  
JUN 27 AM 8:32  
Linda C. Smith  
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 Mr. McNulty:

Enclosed please find a revised page no. 73 of the Direct Testimony of Dr. Mark N. Cooper on behalf of the American Association of Retired Persons for filing in the above-captioned action. Also please find the enclosed, revised Attachment MNC-5, Estimates of PECO's Uneconomic Generation Costs. Due to error the Table of Appendix A was not included in the first filing. However, enclosed is the five page table, Comparison of PECO to Pennsylvania Utilities, that is part of Appendix A.

We apologize for any inconvenience this may have caused anyone. Parties are being served in accord with the attached Certificate of Service.

Very truly yours,

*Linda C. Smith*

Linda C. Smith

LCS:sd  
Enclosures

cc: The Honorable Marlane R. Chestnut  
The Honorable Charles E. Rainey, Jr.  
Certificate of Service

DOCUMENT  
FOLDER

1 accounting treatment, but it should not profit from the use of ratepayer money.

2 I believe that the Commission should scrutinize PECO's claims for recovery  
3 of regulatory assets in this vein.

4

5 Q. WHAT DO YOU RECOMMEND?

6 A. AARP has taken the position that ratepayers should be held responsible for,  
7 at most, 50 percent of stranded costs. As discussed throughout my testimony,  
8 management must be responsible for their share of stranded costs where management  
9 discretion was exercised. This is consistent with the Pennsylvania law's decision to  
10 hold ratepayers responsible for regulatory assets (over which management had no  
11 discretion), as long as the Commission applies the principle I mentioned earlier.  
12 AARP also recognizes that certain financial obligations are binding on utilities in  
13 terms of their debt. The Commission should take this into account as well.

14 In this case, a disallowance of the full value of stranded generation assets, as  
15 supported by the most efficient utility or producer analysis (\$3.8 billion or \$380  
16 million per year), would lower PECO's interest coverage to about 1.8. This is in the  
17 range where bond covenants begin to restrain the utility's ability to float new debt.  
18 Over time, however, the constraint would ease.

19 If the state-wide average is used, a disallowance of \$2.04 billion (\$204 million  
20 per year, would result in an interest coverage in the range of 2.3.

21 I believe that regulatory assets should be recovered, after they are scrutinized  
22 and that at least \$2 billion should be disallowed.

DOCUMENT<sup>73</sup>  
FOLDER

DOCKETED  
JUL 10 1997

**ATTACHMENT MNC-5**  
**ESTIMATES OF PECO'S UNECONOMIC GENERATION COSTS**

<sup>a/</sup>  
 (STRANDED COSTS EXCLUDING REGULATORY ASSETS)

STANDARD	b/ COST (in \$/kwh)	c/ TOTAL (in million \$)	ANNUALIZED (in million \$)
MOST EFFICIENT PRODUCER	.028	4071	407
MOST EFFICIENT UTILITY			
IN STATE	.023	3342	334
NEIGHBORING STATE	.024	3488	349
AVERAGES			
NATIONAL	.023	3342	334
STATE-WIDE	.014	2035	204

<sup>a/</sup> Assumes that (1) the market clearing price calculated by PECO does not include regulatory assets (since non-utilities do not have such assets) and (2) utilities have equal amounts of regulatory assets. Per PECO's analysis, regulatory assets are assumed to be equal to \$2.98 billion or \$0.0188/kwh levelized over 10 years.

<sup>b/</sup> Costs for 1995 derived from Appendix A.

<sup>c/</sup> Uses PECO's estimate of total stranded costs (\$6.8 billion of \$0.0468 per kwh) levelized as the base.

COMPARISON OF PECO TO PENNSYLVANIA UTILITIES

PECO				WEST PENN				PA NON-PECO			
SALES 33611				17511				88332			
COSTS	LINE	ITEM	BY SOURCE	LINE	ITEM	BY SOURCE	BY SOURCE	LINE	ITEM	BY SOURCE	BY SOURCE
			OR FUNCTION			OR FUNCTION	OR FUNCTION			OR FUNCTION	OR FUNCTION
			INCLUDES CAPITAL			INCLUDES CAPITAL	INCLUDES CAPITAL				
IN \$	PER	IN \$	PER	IN \$	PER	IN \$	PER	IN \$	PER	IN \$	PER
	KWH		KWH		KWH		KWH		KWH		KWH
steam											
prod	259 .0077	513.9	.0153	259 .0148	499.9	.0285		1227 .0139	2387.	.0270	
maint	58 .0017			66 .0038				236 .0027			
nuc											
prod	389 .0116	1813.	.0540	0 0 0 0				439 .0050	1513.	.0171	
maint	135 .0040			0 0				117 .0013			
other	280 .0083	314.5	.0094	298 .0170	477.9	.0273		1083 .0123	1812.	.0205	
avg cost	.0334	.0786		.0356	.0558			.0351	.0647		
trans											
prod	16 .0005	149.8	.0045	9 .0005	46.83	.0027		36 .0004	295.1	.0033	
maint	16 .0005			5 .0003				20 .0002			
dist											
prod	60 .0018	636.3	.0189	19 .0011	188.3	.0108		113 .0013	1530.	.0173	
maint	70 .0021			42 .0024				160 .0018			
cust											
prod	135 .0040			30 .0017				221 .0025			
admin	330 .0098	330 .0098		60 .0034	60 .0034			449 .0051	449 .0051		
OPERAT	1748			788				4101			
dep	395 .0118			112 .0064				819 .0093			
amort	33 .0010			1 .0001				28 .0003			
taxes											
gen	281 .0084			90 .0051				527 .0060			
income	203 .0060			59 .0034				523 .0059			
def	170 .0051			54 .0031				662 .0075			
CAP	1082 .0322			316 .0180				2559 .0290			
net in	928 .0276			169 .0097				919 .0150			
TOTAL	3758 .1118	3758 .1118		1273 .0727	1273 .0727			7579 .0904	7986 .0904		
plant	IN \$	ALLOCATOR		IN \$	ALLOCATOR			IN \$	ALLOCATOR		
steam	1341 .0980			1609 .3607				6142 .2379			
nuc	8782 .6415			0 0				6359 .2463			
other	235 .0172			1655 .3710				4846 .1877			
trans	802 .0586			302 .0677				1589 .0615			
dist	2529 .1847			895 .2006				6883 .2666			
	13689 1			4461 1				25819 1			

SOURCE: Energy Information Administration, FINANCIAL STATISTICS OF MAJOR  
U.S. INVESTOR-OWNED ELECTRIC UTILITIES: 1995 (U.S. Department of Energy,  
December, 1996), Tables 37, 39, 40 41 42.

MARYLAND UTILITIES

PEPCO				BGE				US AVERAGE				
SALES 23445				28191				2.3e6				
COSTS		BY SOURCE		BY SOURCE		BY SOURCE		BY SOURCE		BY SOURCE		
LINE	ITEM	OR	FUNCTION	LINE	ITEM	OR	FUNCTION	LINE	ITEM	OR	FUNCTION	
IN \$	PER	IN \$	PER	IN \$	PER	IN \$	PER	IN \$	PER	IN \$	PER	
	KWH		KWH		KWH		KWH		KWH		KWH	
steam												
prod	377	.0161	685.6	.0292	321	.0114	758.7	.0269	28653	.0125	55305	.0242
maint	52	.0022			45	.0016			4118	.0018		
nuc												
prod	0	0	0	0	156	.0055	483.6	.0172	8530	.0037	35525	.0155
maint	0	0			63	.0022			2928	.0013		
other	590	.0252	647.9	.0276	256	.0091	287.2	.0102	32155	.0141	36106	.0158
avg cost		.0435		.0569		.0298		.0543		.0334		.0555
trans												
prod	7	.0003	96.24	.0041	8	.0003	103.9	.0037	1425	.0006	12647	.0055
maint	6	.0003			4	.0001			704	.0003		
dist												
prod	23	.0010	510.3	.0218	62	.0022	504.6	.0179	2560	.0011	33922	.0148
maint	116	.0049			35	.0012			3314	.0014		
cust												
prod	41	.0017			49	.0017			2270	.0010		
admin	106	.0045	106	.0045	190	.0067	190	.0067	13373	.0058	13373	.0058
OPERAT	1318				1189				1.0e5			
dep	170	.0073			221	.0078			18503	.0081		
amort	2	.0001			37	.0013			1381	.0006		
taxes												
gen	203	.0087			173	.0061			13519	.0059		
income	74	.0032			108	.0038			11500	.0050		
def	164	.0070			134	.0048			7300	.0032		
CAP	613	.0261			673	.0239			52203	.0228		
net in	115	.0049			466	.0165			34646	.0151		
TOTAL	2046	.0873	2046	.0873	2328	.0826	2328	.0826	1.9e5	.0817	1.9e5	.0817
plant IN \$ ALLOCATOR												
steam	1942	.3525			2142	.3448			1.4e5	.2595		
nuc	0	0			1443	.2323			1.5e5	.2771		
other	438	.0795			170	.0274			23835	.0455		
trans	630	.1143			501	.0807			63454	.1211		
dist	2500	.4537			1956	.3149			1.6e5	.2968		
	5510	1			6212	1			5.2e5	1		

OTHER PA UTILITIES

PP&L		DUQ				MET						
SALES 31507		12415				11009						
COSTS	LINE ITEM	BY SOURCE OR FUNCTION		LINE ITEM	BY SOURCE OR FUNCTION		LINE ITEM	BY SOURCE OR FUNCTION				
	IN \$	PER KWH	IN \$	PER KWH	IN \$	PER KWH	IN \$	PER KWH	IN \$	PER KWH		
steam												
prod	454	.0144	908.3	.0288	196	.0158	340.7	.0274	80	.0073	160.9	.0146
maint	88	.0028			31	.0025			19	.0017		
nuc												
prod	187	.0059	965.3	.0306	128	.0103	298.5	.0240	62	.0056	135.1	.0123
maint	61	.0019			25	.0020			14	.0013		
other	306	.0097	330.8	.0105	32	.0026	293.2	.0236	224	.0203	352.9	.0321
avg cost		.0348		.0700		.0332		.0751		.0362		.0589
trans												
prod	4	.0001	76.32	.0024	8	.0006	47.97	.0039	6	.0005	41.70	.0038
maint	6	.0002			3	.0002			2	.0002		
dist												
prod	36	.0011	643.3	.0204	18	.0014	214.6	.0173	14	.0013	181.4	.0165
maint	52	.0017			18	.0014			15	.0014		
cust												
prod	85	.0027			36	.0029			26	.0024		
admin	127	.0040	127	.0040	96	.0077	96	.0077	65	.0059	65	.0059
OPERAT	1406				591				527			
dep	348	.0110			150	.0121			95	.0086		
amort	1	3e-5			25	.0020			0	0		
taxes												
gen	201	.0064			86	.0069			55	.0050		
income	259	.0082			130	.0105			22	.0020		
def	263	.0083			65	.0052			107	.0097		
CAP	1072	.0340			456	.0367			279	.0253		
net in	573	.0182			244	.0197			131	.0119		
TOTAL	3051	.0968	3051	.0968	1291	.1040	1291	.1040	937	.0851	937	.0851
plant	IN \$	ALLOCATOR	IN \$	ALLOCATOR	IN \$	ALLOCATOR	IN \$	ALLOCATOR	IN \$	ALLOCATOR	IN \$	ALLOCATOR
steam	2066	.2227	907	.1624	441	.1510						
nuc	4045	.4360	1161	.2079	421	.1442						
other	140	.0151	2084	.3731	918	.3144						
trans	374	.0403	295	.0528	240	.0822						
dist	2652	.2859	1138	.2038	900	.3082						
	9277	1	5585	1	2920	1						

OTHER PA UTILITIES

PENELEC				PENPOW			
SALES 12193				3697			
COSTS	LINE	ITEM	BY SOURCE OR FUNCTION	LINE	ITEM	BY SOURCE OR FUNCTION	
IN \$	PER	IN \$	PER	IN \$	PER	IN \$	PER
	KWH		KWH		KWH		KWH
steam							
prod	191 .0157	380.9 .0312		47 .0127	94.35 .0255		
maint	24 .0020			8 .0022			
nuc							
prod	32 .0026	79.52 .0065		30 .0081	120.4 .0326		
maint	7 .0006			10 .0027			
other	211 .0173	219.6 .0180		12 .0032	12.62 .0034		
avg cost	.0381	.0558		.0289	.0615		
trans							
prod	6 .0005	57.55 .0047		3 .0008	23.52 .0064		
maint	2 .0002			2 .0005			
dist							
prod	22 .0018	293.3 .0241		4 .0011	51.10 .0138		
maint	26 .0021			7 .0019			
cust							
prod	36 .0030			8 .0022			
admin	77 .0063	77 .0063		24 .0065	24 .0065		
OPERAT	634			155			
dep	83 .0068			31 .0084			
amort	0 0			1 .0003			
taxes							
gen	67 .0055			28 .0076			
income	27 .0022			26 .0070			
def	155 .0127			18 .0049			
CAP	332 .0272			104 .0281			
net in	142 .0116			67 .0181			
TOTAL	1108 .0909	1108 .0909		326 .0882	326 .0882		
plant	IN \$	ALLOCATOR		IN \$	ALLOCATOR		
steam	864 .3501			255 .2301			
nuc	211 .0855			521 .4702			
other	45 .0182			4 .0036			
trans	258 .1045			120 .1083			
dist	1090 .4417			208 .1877			
	2468 1			1108 1			

SOURCE: Energy Information Administration, FINANCIAL

COMPARISON OF PECO DOE 1995 DATA TO PECO 1996 COST STUDY

PECO 1995 DOE				PECO 1996 COST STUDY			
SALES 33611				32672			
COSTS	LINE ITEM	BY SOURCE OR FUNCTION		LINE ITEM	BY SOURCE OR FUNCTION		
		INCLUDES CAPITAL			INCLUDES CAPITAL		
	IN \$	PER KWH	PER KWH	IN \$	PER KWH	PER KWH	
steam							
prod	259	.0077	513.9 .0153	255	.0078	499.9 .0153	
maint	58	.0017		49	.0015		
nuc							
prod	389	.0116	1813. .0540	408	.0125	1825. .0559	
maint	135	.0040		98	.0030		
other	280	.0083	314.5 .0094	84	.0026	118.0 .0036	
avg cost		.0334	.0786		.0274	.0748	
trans							
prod	16	.0005	149.8 .0045	25	.0008	158.0 .0048	
maint	16	.0005		14	.0004		
dist							
prod	60	.0018	636.3 .0189	53	.0016	668.9 .0205	
maint	70	.0021		80	.0024		
cust							
prod	135	.0040		154	.0047		
admin	330	.0098	330 .0098	321	.0098	321 .0098	
OPERAT	1748			1541			
dep	395	.0118		527	.0161		
amort	33	.0010		0	0		
taxes							
gen	281	.0084		274	.0084		
income	203	.0060		272	.0083		
def	170	.0051		128	.0039		
CAP	1082	.0322		1201	.0368		
net in	928	.0276		849	.0260		
TOTAL	3758	.1118	3758 .1118	3591	.1099	3591 .1099	
plant	IN \$	ALLOCATOR		IN \$	ALLOCATOR		
steam	1341	.0980		1348	.0955		
nuc	8782	.6415		9079	.6435		
other	235	.0172		234	.0166		
trans	802	.0586		819	.0581		
dist	2529	.1847		2628	.1863		
	13689	1		14108	1		

SOURCE: Energy Information Administration, FINANCIAL STATISTICS OF MAJO INVESTOR-OWNED ELECTRIC UTILITIES: 1995 (U.S. Department of Energy, Dece Tables 37, 39, 40 41 42, for 1995; Exhibit RAC-1 COST OF SERVICE STUDY,

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, June 26, 1997.

VIA HAND DELIVERY AND FIRST CLASS MAIL

Paul R. Bonney, Esquire  
Noel H. Trask, Esquire  
PECO Energy Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Mr. Sam DeFrawi, Director  
Navy Rate Intervention  
Washington Navy Yard  
Code 00RI, Building 212  
901 M Street, S.E.  
Washington, DC 20374-5018

Kenneth Mickens, Esquire  
Charles D. Shields, Esquire  
Office of Trial Staff  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Terence Fitzpatrick, Esquire  
David DeSalle, Esquire  
GPU Energy  
Ryan, Russell, Ogden & Seltzer  
800 N Third Street, Suite 101  
Harrisburg, PA 17102

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Indianapolis Power & Light Co.  
204 State Street  
Harrisburg, PA 17101

Bernard A. Ryan, Esquire  
Karen Oill Moury, Esquire  
Small Business Advocate  
300 N. 2nd Street, Suite 1102  
Harrisburg, PA 17101

Gerald Gornish, Esquire  
Enron Corporation  
Wolf Block Schorr Solis-Cohen  
401 North Front Street  
Harrisburg, PA 17101

David Kleppinger, Esquire  
Derrick P. Williamson, Esquire  
PAIEUG  
McNees, Wallace & Nurick  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Janet Miller, Esquire  
MAPSA  
Malatesta, Hawke & McKeon  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601

Bruce A. Connell, Esquire  
DuPont Power Marketing Inc.  
600 N Dairy Ashford, ML-1034  
Houston, TX 77079

Paul Russell, Esquire  
Pennsylvania Power & Light Co  
Two North Ninth Street  
Allentown, PA 18101

Craig A. Doll, Esquire  
Delmarva Power & Light Company  
214 State Street  
Harrisburg, PA 17101

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Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

Roger Clark, Esquire  
Environmentalists  
905 Denston Drive  
Ambler, PA 19002-3901

Donald A. Kaplan, Esquire  
Pennsylvania Power & Light  
Suite 500  
1735 New York Avenue NW  
Washington, DC 20006-4759

Michael L. Kessler  
Vice President and General Counsel  
American Energy Solutions, Inc.  
111 South Alfred Street  
Alexandria, VA 22314

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

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

Audrey Van Dyke, Esquire  
Naval Facilities Engineering  
Washington Navy Yard  
Bldg. 218, Room 200  
901 M. Street, S.E.  
Washington, DC 20374

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Municipal Intervenors Group  
Malatesta, Hawke & McKeon LLP  
P.O. Box 1778  
Harrisburg, PA 17105

David Boonin  
New Energy Ventures  
200 S Broad Street, Suite 800  
Philadelphia, PA 19107

Christopher B. Craig, Esquire  
Senator Vincent J. Fumo  
Room 545 Main Capitol Bldg  
Harrisburg, PA 17120

Lance S. Haver  
6048 Ogontz Avenue  
Philadelphia, PA 19141

Peter Bradford  
P.O. Box 497  
Peru, Vermont 05152

Mr. Doug Smith  
LaCapra Associates

Joseph A. Dworetzky, Esquire  
New Energy Ventures  
Hangley, Aronchick, et. al.  
One Logan Square, 12th Floor  
Philadelphia, PA 19103

Gary A. Jefferies, Esquire  
CNG Energy Services Corp.  
One Park Ridge Center  
P.O. Box 15746  
Pittsburgh, PA 15244-0746

Usher Fogel, Esquire  
PA Petroleum Association  
Roland Fogel Koblenz & Carr  
1 Columbia Place  
Albany, NY 12207

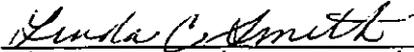
Paul L. Ziegler, Esquire  
Delaware Valley Schools Energy  
Ziefler & Zimmerman PC  
355 North 21st Street, Suite 304  
P.O. Box 1080  
Camp Hill, PA 17011

Ethan Giddings  
217 Rodman Avenue  
Jenkintown, PA 19046

Gordon Smith, Esquire  
Duke Energy Trading & Marketing  
John & Hengerer  
1200 17th St., N.W., Ste.600  
Washington, DC 20036

Susan Shanaman, Esquire  
Center for Energy and Economic  
212 North Third Street, Ste.203  
Harrisburg, PA 17101-1505

Allen J. Barak  
Environmentalists  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112

  
\_\_\_\_\_  
Linda C. Smith, Esquire

**JOHN & HENGERER**  
A LAW PARTNERSHIP  
1200 17TH STREET, N.W.  
SUITE 600  
WASHINGTON, D.C. 20036-3006

ORIGINAL

DOUGLAS F. JOHN  
EDWARD W. HENGERER  
KEVIN M. SWEENEY  
KIM M. CLARK  
GORDON J. SMITH  
SHELBY L. PROVENCHER

June 27, 1997

TELEPHONE  
202/429-8809

TELECOPIER  
202/429-8805

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JUN 27 1997

*Via Overnight Mail*

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

PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

**RE: Petition for Approval of Restructuring Plan (Docket No. R-00973953)**

Dear Sirs:

I've included for filing an original, 5 copies and 2 diskette copies of the Petition for Leave to Intervene and Participate of NorAm Energy Management, Inc. in the above-referenced docket. Please return two stamped copies in the attached envelope for our records.

Thank you for your attention to this matter.

Sincerely,



Gordon Smith

Counsel For  
NorAm Energy Management, Inc.

F:\word\317\pleading\pa-peco.11

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FOLDER

73

PLEASE FOLD THIS SHIPPING DOCUMENT IN HALF AND PLACE IT IN A WAYBILL POUCH AFFIXED TO YOUR SHIPMENT SO THAT THE BAR-CODE PORTION OF THE LABEL CAN BE READ AND SCANNED.  
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FROM: Joelle Ogg (202)429-8800  
John & Hengerer  
1200 17th Street, N.W.  
Suite 600  
Washington, DC 200363006

SHIPPER'S FEDEX ACCOUNT NUMBER



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PA Public Utility Commission  
Commwealth & North Street  
North Office Building, RM B-20  
Harrisburg, PA 17105-3625

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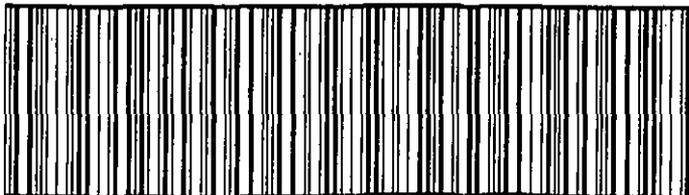
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JUN 27 1997

BEFORE THE  
PA PUBLIC UTILITY COMMISSION  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

Application of PECO Energy Company for )  
Approval of its Restructuring Plan )

Docket No.  
R-00973953

PETITION FOR LEAVE TO INTERVENE AND PARTICIPATE OF  
NORAM ENERGY MANAGEMENT , INC.

This Petition for Leave to Intervene and Participate in the above-referenced proceeding is filed by NorAm Energy Management, Inc. (NorAm) pursuant to the Public Utility Commission's (Commission) Rules of Procedure and Practice, 52 Pa. Code § 5.71, *et. seq.*, and the Prehearing Orders. NorAm requests that this Motion be granted for the reasons set forth below:

I.

Communications and correspondence concerning this Motion should be directed to:

Gordon J. Smith, Esq.  
JOHN & HENGERER  
1200 17<sup>th</sup> Street, N.W.  
Suite 600  
Washington, D.C. 20036-3006  
Telephone: (202) 429-8814  
Facsimile: (202) 429-8805

Keith M. Sappenfield, II  
Director of Marketing Support  
NORAM ENERGY MANAGEMENT, INC.  
P.O. Box 2628  
Houston, TX 77252-2628  
Telephone: (713) 654-5864

II.

NorAm is a Delaware corporation. NorAm's principal place of business is located at 1600 Smith Street, Houston, Texas 77002. NorAm is involved in the retail marketing of natural gas and electricity nationwide. NorAm intends to serve customers on PECO Energy Company's (PECO) distribution system and has significant interest in the Pennsylvania electricity market in general.

DOCKETED  
JUL 02 1997

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### III.

On January 24, 1997, the Commission issued an order directing PECO to file its restructuring plan. On April 1, 1997, PECO filed its restructuring plan.

### IV.

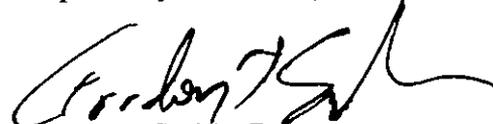
As a potential marketer of electricity to customers presently served in PECO's service territory, NorAm will be directly and specifically affected by the outcome of this proceeding. NorAm's interests in this proceeding cannot be adequately represented or protected by any other party hereto. Moreover, as a power marketer, NorAm likely can contribute to the development of a complete record in this case as well as settlement discussions. Under the circumstances, NorAm submits that good cause exists to grant it leave to intervene and participate herein.

At this early stage in the proceeding, NorAm does not have any testimony. NorAm wishes, however, to be considered an active party and reserves its right to participate in the hearings and file briefs as the Commission may subsequently allow, as well as in any settlement discussions.

v.

WHEREFORE, NorAm requests that the Commission grant this Motion and that NorAm be made a party to this proceeding for all purposes.

Respectfully submitted,



Gordon J. Smith, Esq.  
JOHN & HENGERER  
1200 17th Street, N.W.  
Suite 600  
Washington, D.C. 20036

Counsel for NorAm Energy Management,  
Inc.

I hereby certify that I have this day served a true copy of the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Washington D.C.: June 27, 1997



**PECO ENERGY**

003645

**DOCUMENT  
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Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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

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PROTHONOTARY'S OFFICE Direct Dial: 215 841 4252

*McNulty*

June 27, 1997

**By Overnight Delivery**

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

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-40.

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)



# PECO ENERGY

Legal Department

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

003646

97 JUL -1 PM

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
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Christine A. Reuther  
Wendy Schermer  
Susan E. Sciamanna Foehl  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

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PROTHONOTARY'S OFFICE  
Direct Dial: 215 841 4252  
June 27, 1997

**By Overnight Delivery**

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

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

Dear Tanya:

Enclosed is PECO Energy Company's Answer to the Office of Consumer  
Advocate's Interrogatory:

Set XV: OCA-XV-52.

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:

Department of the Navy's Interrogatory: Set I Navy-I-40.

~~\_\_\_\_\_~~  
Office of Consumer Advocate's Interrogatory: Set XV: OCA-XV-52.

Kenneth L. Mickens, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

DOCUMENT  
FOLDER

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Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortetzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aranchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summit Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Robert A. Mills, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
(Counsel for PRA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: June 27, 1997

**ORIGINAL**

**VERNER LIPPERT  
BERNHARD McPHERSON & HAND  
[CHARTERED]**

901 - 15TH STREET, N.W.  
WASHINGTON, D.C. 20005-2301  
(202) 371-6000  
FAX: (202) 371-6279

Deborah A. Swanstrom  
(202) 371-6197

June 30, 1997

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**MEM**

**VIA FEDERAL EXPRESS**

James J. McNulty  
Acting Prothonotary  
Pennsylvania Public Utility Commission  
North Office Building  
North Street and Commonwealth Avenue  
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

**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**

Dear Mr. McNulty:

Enclosed for filing in the above-captioned proceeding are an original and three copies of the Objection of Allegheny Power to Interrogatory of PECO Energy Company.

Also enclosed is an additional copy to be stamped and returned to us in the enclosed self-addressed envelope. Thank you for your assistance.

Very truly yours,

Deborah A. Swanstrom  
Attorney for Allegheny Power

cc: The Honorable Marlane R. Chestnut (Via Federal Express)  
The Honorable Charles E. Rainey, Jr. (Via Federal Express)  
Service List (Via First Class Mail)

HOUSTON, TEXAS  
2600 TEXAS COMMERCE TOWER  
600 TRAVIS  
HOUSTON, TEXAS 77002  
(713) 225-7200  
FAX: (713) 237-1216

AUSTIN, TEXAS  
SAN JACINTO CENTER  
98 SAN JACINTO BLVD, SUITE 1440  
AUSTIN, TEXAS 78701  
(512) 703-6000  
FAX: (512) 703-6003

HONOLULU, HAWAII  
HAWAII TIMES BUILDING  
928 NUUANU AVE, SUITE 400  
HONOLULU, HAWAII 96817  
(808) 566-0999  
FAX: (808) 566-0995

McLEAN, VIRGINIA  
8280 GREENSBORO DRIVE  
SUITE 601  
McLEAN, VIRGINIA 22102  
(703) 749-6000  
FAX: (703) 749-6027

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**ORIGINAL**

**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**

**RECEIVED**

**OBJECTION OF ALLEGHENY POWER  
TO INTERROGATORY  
OF PECO ENERGY COMPANY**

**JUN 30 1997**

**PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE**

Pursuant to 52 Pa. Code § 5.342(c), Allegheny Power objects to Question 11,

Set MP-II (Supplier), of the Interrogatories submitted by PECO Energy Company ("PECO") in this proceeding. In support hereof, Allegheny Power avers as follows:

**I.  
BACKGROUND**

By letter dated June 24, 1997, PECO served a set of interrogatories, entitled "Set MP-II (Supplier)," on Allegheny Power. In Question 11 of the these interrogatories, PECO requested:

**DOCUMENT  
FOLDER**

- PECO-11: (a) If you are or have been a supplier of electric energy or capacity, identify and describe the price quotes or offers you have provided to retail and wholesale customers in the Mid-Atlantic region during 1995, 1996, and/or 1997. If you are not and have not been a supplier of electric energy or capacity, please so state.
- (b) Describe the terms and conditions of service offered.
- (c) Produce copies of all documents that contain such quotes or offers.
- (d) For each such customer, identify the lowest and highest price quoted.

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**JUL 03 1997**

In accordance with the Presiding Judges' Prehearing Order #1, on June 27, 1997, counsel for Allegheny Power orally communicated its objections to this Question to counsel for PECO.

## II. OBJECTIONS

Allegheny Power objects to this Question on several grounds. First of all, the Question encompasses highly confidential, proprietary information about contract negotiations between Allegheny Power and its customers, including the prices and terms offered by Allegheny Power in these confidential negotiations. If this type of information were released to a competitor, such as PECO, Allegheny Power could suffer irreparable competitive harm.

Similarly, if this information were released to other existing customers or potential new customers, Allegheny Power could be harmed irreparably in its future negotiations with these customers. The best offer provided by Allegheny Power in past negotiations may effectively become the floor in future negotiations, thereby injuring Allegheny Power.

Moreover, some of the information now sought by PECO is contained in special contracts that were filed with the Pennsylvania Public Utility Commission ("Commission") under confidential seal to protect the proprietary interests of not just Allegheny Power, but its customers as well. It would be inappropriate to turn this type of sensitive information over to the employees of Allegheny Power's competitor, even if a formal Protective Order was to be issued in this proceeding. See 52 Pa. Code § 5.423(c).

Second, the Question is not relevant or even reasonably calculated to lead to the discovery of relevant evidence in this proceeding. Allegheny Power has not taken a position on PECO's market price projections or generation rates in this proceeding. Moreover, the price quotes and offers which Allegheny Power made in Allegheny Power's service territory for the past periods of 1995, 1996, and 1997 are not relevant to PECO's market price projections in the PJM area for the future periods of 1999 to 2015.

Third, the Question is overly broad and unduly burdensome. Allegheny Power has approximately 1.4 million residential customers and 60 wholesale customers. It would take hundreds of employee hours to search all of Allegheny Power's corporate and employee files, as well as its tariff and rate filings, in order to respond to this Question. In addition to labor and overtime costs, Allegheny Power also would be forced to incur excessive copying costs.

As PECO knows, Allegheny Power is in the midst of preparing its own restructuring case for filing with the Commission on August 1, 1997. Allegheny Power cannot divert its employees, at this time, to the unreasonable search sought by PECO. Even assuming for the sake of argument that PECO's Question had any probative value -- which Allegheny Power disputes -- the degree of burden imposed on Allegheny Power and the competitive harm that could result from responding to this Question far outweighs the probative value of the information sought by PECO.

WHEREFORE, for the reasons set forth above, Allegheny Power respectfully requests that the Commission grant its objections and strike Set MP-II (Supplier), Question 11 from the interrogatories submitted by PECO.

Respectfully submitted,

By:   
Clinton A. Vince  
Paul E. Nordstrom  
Deborah A. Swanstrom  
Joel D. Newton  
Verner, Lipfert, Bernhard, McPherson & Hand  
901 15th Street, NW  
Washington, DC 20005-2301  
(202) 371-6197

and

John L. Munsch  
Attorney  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601  
(412) 838-6210

Attorneys for Allegheny Power

Dated: June 30, 1997

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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

Paul R. Bonney  
Ward Smith  
Robin L. Krongold  
PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101

Senator Vincent J. Fumo  
Chairman of Senate Democratic  
Committee on Appropriations  
Room 545  
Main Capitol Building  
Harrisburg, PA 17120

James D. Steffes  
ENRON Corp.  
1400 Smith Street  
P.O. Box 4428  
Houston, TX 77002

Daniel Clearfield, Esq.  
Alan Kohler, Esq.  
Robert Longwell, Esq.  
Wolf, Block, Schorr and Solis-Cohen  
305 North Front Street, Suite 401  
Harrisburg, PA 17101

Craig A. Doll, Esq.  
214 State Street  
Harrisburg, PA 17101

Randall V. Griffin, Esq.  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899

James W. Durham  
Senior VP and General Counsel  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101-8699

Bernard Ryan, Esq.  
Karen Oill Moury, Esq.  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North 2nd Street  
Harrisburg, PA 17101

Kenneth Mickens  
Senior Prosecutor  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Walter W. Cohen, Esq.  
Andrew J. Giorgione, Esq.  
Obermayer Rebmann Maxwell Hippel, LLP  
204 State Street  
Harrisburg, PA 17102

Alan J. Barak, Esq.  
Penn Energy Project  
Widener University School of Law  
3700 Vartan Way  
Harrisburg, PA 17110

Irwin Popowsky, Esq.  
Tanya McCloskey, Esq.  
Steven Steinmetz, Esq.  
Office of Consumer Advocate  
14th Floor, Strawberry Square  
Harrisburg, PA 17120

Paul Russell, Esq.  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

David Kleppinger, Esq.  
McNees, Wallace & Nurick  
PO Box 1166  
Harrisburg, PA 17108-1166

David M. Boonin  
President, Mid-Atlantic  
New Energy Ventures, Inc.  
200 S. Broad Street, Suite 800  
Philadelphia, PA 19102

Michael G. Banta, Esq.  
Vice President and  
Assistant General Counsel  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Ernest E. Jones, Esq.  
1207 Chestnut Street  
7th Floor  
Philadelphia, PA 19107

Steven P. Hershey, Esq.  
Petter Meadows, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

Donald A. Kaplan, Esq.  
Preston, Gates, et al.  
1735 New York Avenue, NW  
Washington, DC 20006-4759

W. Edwin Ogden, Esq.  
Alan Michael Seltzer, Esq.  
Ryan, Russell, Ogden & Seltzer  
1100 Berkshire Boulevard  
Suite 301  
Reading, PA 19610

Christopher B. Craig, Esq.  
Democratic Committee on Appropriations  
Room 545  
Main Capitol Building  
Harrisburg, PA 17120

Lance Haver  
6048 Ogontz Avenue  
Philadelphia, PA 19141

Angel L. Ortiz  
City Councilman  
City Hall - room 590  
Philadelphia, PA 19107

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

Richard LaCapra  
LaCapra Associates  
The Providence Building  
333 Washington Street  
Boston, MA 02108

William T. Hawke, Esq.  
Janet L. Miller, Esq.  
Todd S. Stewart, Esq.  
P.O. box 1778  
Harrisburg Energy Center  
Harrisburg, PA 17105-1778

The McFerren Corp.  
200 N. Third Street  
Suite 1100  
Harrisburg, PA 17101

Joseph A. Dworetzky, Esq.  
John P. Lavelle, Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square  
Twelfth Floor  
Philadelphia, PA 19103-6933

Bruce A. Connell, Esq.  
Dupont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Terrance FitzPatrick  
David DeSalle  
Ryan Russell Ogden & Seltzer  
800 N. Third Street  
Suite 101  
Harrisburg, PA 17102

Paul L. Zeigler, Esq.  
Zeigler & Zimmerman, PC  
344 N. 21st Street  
Suite 304  
PO Box 1080  
Camp Hill, PA 17011-3707

Linda C. Smith, Esq.  
Dilworth, Paxson, Kalish & Kauffman  
305 N. Front Street  
Suite 403  
Harrisburg, PA 17101-1236

Gary A. Jeffries, Esq.  
CNG Energy Services Corporation  
One Park Ridge Center  
PO Box 15746  
Pittsburgh, PA 15244-0746

Mr. Sam DeFrawi  
Director, Navy Rate Intervention  
Washington Navy Yard  
Building 212, Code 00RI  
901 M Street, S.E.  
Washington, DC 20374-5018

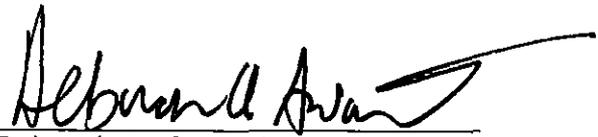
Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Meramec Avenue  
St. Louis, MO 63105

Michael L. Kessler  
Vice President & General Counsel  
American Energy Solutions, Inc.  
111 S. Alfred Street  
Alexandria, VA 22304

Audrey Van Dyke  
Associate Counsel (Litigation)  
Naval Facilities Engineering Command  
Washington Navy Yard  
Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Rufus L. Miley  
22 Leopard Run  
Glen Mills, PA 19342

Dated this 30th day of June, 1997.



Deborah A. Swanstrom  
Verner, Liipfert, Bernhard,  
McPherson and Hand  
901 15th Street, NW  
Suite 700  
Washington, DC 20005

Attorney for Allegheny Power

VERNER · LIIPFERT  
BERNHARD · McPHERSON & HAND  
CHARTERED

901 - 15TH STREET, N.W.  
WASHINGTON, D.C. 20005-2301  
(202) 371-6000  
FAX: (202) 371-6279

Writer's Direct Dial  
(202) 371-6137

June 30, 1997

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JUN 30 1997

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FOLDER

PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

MEM

David M. Kleppinger, Esq.  
McNees, Wallace & Nurick  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108

**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. Kleppinger:

Enclosed are two copies of Allegheny Power's Interrogatories to Philadelphia Area Industrial Energy Users Group, Set I, Nos. 1-23.

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)

HOUSTON, TEXAS  
2600 TEXAS COMMERCE TOWER  
600 TRAVIS  
HOUSTON, TEXAS 77002  
(713) 225-7200  
FAX: (713) 237-1216

AUSTIN, TEXAS  
SAN JACINTO CENTER  
98 SAN JACINTO BLVD, SUITE 1440  
AUSTIN, TEXAS 78701  
(512) 703-6000  
FAX: (512) 703-6003

HONOLULU, HAWAII  
HAWAII TIMES BUILDING  
928 NUUANU AVE, SUITE 400  
HONOLULU, HAWAII 96817  
(808) 566-0999  
FAX: (808) 566-0995

McLEAN, VIRGINIA  
8280 GREENSBORO DRIVE  
SUITE 601  
McLEAN, VIRGINIA 22102  
(703) 749-6000  
FAX: (703) 749-6027

**PECO Energy Company  
Docket No. R-00973953**

**Allegheny Power  
Interrogatories for PAIEUG  
Set I**

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PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

- ALLEGHENY-1: (a) Please provide a copy, in machine readable format, of the input and output data to the model results described at pages 96-110 of Mr. Falkenberg's testimony.
- (b) Please separately list the "360 individual generators" and the "large number of capacity additions, IPPs, and imports" which Mr. Falkenberg asserts were modeled at page 97 of his testimony.
- ALLEGHENY-2: (a) Please describe in detail how the model operates.
- (b) Please also provide a copy of any users manual associated with the model.
- ALLEGHENY-3: Has the model ever been made available to any person or entity outside J. Kennedy and Associates, Inc.? If so, please list the persons and/or entities to whom it has been made available.
- ALLEGHENY-4: Has the model ever been verified or used by any person or entity outside J. Kennedy and Associates. If so, please list the person or entity which verified or used the model.
- ALLEGHENY-5: (a) Please describe in detail how the model, if at all, replicates the physical transmission facilities within the PJM system and the physical transmission facilities used to import power into PJM or export power from PJM.
- (b) Does the model take account at all of any internal constraints within PJM? If so, please describe how.
- (c) Does the model take account of any import constraints associated with delivering power to PJM? If so, please describe how.

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**PECO Energy Company**  
**Docket No. R-00973953**

**Allegheny Power**  
**Interrogatories for PAIEUG**  
**Set I**

- ALLEGHENY-6: (a) Please state Mr. Falkenberg's understanding of the amount of simultaneous import capability into the PJM system.
- (b) Is it Mr. Falkenberg's opinion that this amount of import capability described in response to Question 6(a) will have no material impact on prices within PJM? If so, please state in detail the rationale for your opinion.
- ALLEGHENY-7: Does Mr. Falkenberg admit that the GE MAPS model replicates, on a load flow analysis basis, the actual physical constraints associated with the flow of power associated with the generation and load input assumptions in the GE MAPS model? If not, please explain your understanding of how GE MAPS works and contrast its replication of transmission facilities and transfer capabilities with the replications, if any, inherent in Mr. Falkenberg's model.
- ALLEGHENY-8: Please provide a copy of the coding for Mr. Falkenberg's model, in machine readable format. If the coding is subject to copyright or other protections, we are willing to execute a use agreement which limits the use of the model to purposes of this litigation, forbids us from making any commercial use of the model and requires us to return all materials at the conclusion of the litigation.
- ALLEGHENY-9: With respect to the discussion at page 11 of Mr. Falkenberg's testimony regarding the "method" utilized by PECO and the "method" utilized by PP&L, does Mr. Falkenberg admit that both methods should produce the same result if the discount rate used to present value the anticipated revenue stream in the PECO method is the same as the cost of capital used in the revenue requirement under the PP&L method? If not, please provide a detailed calculation illustrating how the two methods, as applied, produce different results and explain the basis for the calculation.

**PECO Energy Company  
Docket No. R-00973953**

**Allegheny Power  
Interrogatories for PAIEUG  
Set I**

- ALLEGHENY-10: Does Mr. Falkenberg have an opinion as to the appropriateness of using EIA Form 860 data which are average full load heat rates, as opposed to using data which replicate heat rates by unit at different levels of output? If so, please state that opinion and the basis for the opinion.
- ALLEGHENY-11: Has Mr. Falkenberg ever attempted to utilize the Form 860 data adjusted to reflect something other than full load heat rates by unit? If so, please provide copies of all documents associated with such attempts and describe in detail the results of such attempts.
- ALLEGHENY-12: Does Mr. Falkenberg have any opinion as to how the problem associated with negative cycle costs should be solved. If so, please describe.
- ALLEGHENY-13: Mr. Falkenberg's market price data as reflected on his Exhibits 8, 9, and 10 does not appear to differ materially from those of Mr. Hieronymus in the years beyond 2004. They do appear to differ for the 1999 case. Does Mr. Falkenberg have an opinion as to why this is so? If so, please describe your opinion and rationale in detail.
- ALLEGHENY-14: Please describe in detail how Mr. Falkenberg's model handles unit commitment.
- ALLEGHENY-15: Has Mr. Falkenberg made any investigation of expected or possible technology trends as they affect heat rates and the capital cost of new combined cycle and combustion turbine plants? If so, please describe any such investigation and summarize the results.

**PECO Energy Company**  
**Docket No. R-00973953**

**Allegheny Power**  
**Interrogatories for PAIEUG**  
**Set I**

- ALLEGHENY-16: Aside from the issue of assumptions/inputs, is Mr. Falkenberg's only disagreement with the GE MAPS model the alleged inability of the GE MAPS model to achieve an expected value without running the model 100 times? If not, please describe in detail every other disagreement.
- ALLEGHENY-17: Would Mr. Falkenberg characterize his model principally as a stacking model, load flow model or transportation model? Please explain your answer.
- ALLEGHENY-18: Is it Mr. Falkenberg's opinion that bidding average cost is the only means by which a generator can implement a profit maximization strategy? If not, please explain your answer.
- ALLEGHENY-19: Does Mr. Falkenberg believe his model is the only model (whether or not commercially available) that can establish a reasonable estimation of market prices? If not, what models does he believe can reasonably estimate market prices?
- ALLEGHENY-20: Does Mr. Falkenberg admit that there are some things that a load flow model does better than a stacking or transportation model? If so, what are they?
- ALLEGHENY-21: Does Mr. Falkenberg admit that there are some things that a stacking model does better than a load flow or transportation model? If so, what are they?
- ALLEGHENY-22: Does Mr. Falkenberg admit that there are some things that a transportation model does better than a load flow or stacking model? If so, what are they?
- ALLEGHENY-23: Has Mr. Falkenberg ever benchmarked his projections of marginal generational costs using his model against actual marginal generation costs as actually occurred? If so, please provide the results.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Allegheny Power's Interrogatories to Philadelphia Area Industrial Energy Users Group, Set I, Nos. 1-23, upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

Paul R. Bonney  
Ward Smith  
Robin L. Krongold  
PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101

Senator Vincent J. Fumo  
Chairman of Senate Democratic  
Committee on Appropriations  
Room 545  
Main Capitol Building  
Harrisburg, PA 17120

James D. Steffes  
ENRON Corp.  
1400 Smith Street  
P.O. Box 4428  
Houston, TX 77002

Daniel Clearfield, Esq.  
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Robert Longwell, Esq.  
Wolf, Block, Schorr and Solis-Cohen  
305 North Front Street, Suite 401  
Harrisburg, PA 17101

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214 State Street  
Harrisburg, PA 17101

Randall V. Griffin, Esq.  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899

James W. Durham  
Senior VP and General Counsel  
PECO Energy Company  
2301 Market Street

Bernard Ryan, Esq.  
Karen Oill Moury, Esq.  
Office of Small Business Advocate  
Suite 1102, Commerce Building

Philadelphia, PA 19101-8699

Kenneth Mickens  
Senior Prosecutor  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Walter W. Cohen, Esq.  
Andrew J. Giorgione, Esq.  
Obermayer Rebmann Maxwell Hoppel, LLP  
204 State Street  
Harrisburg, PA 17102

Alan J. Barak, Esq.  
Penn Energy Project  
Widener University School of Law  
3700 Vartan Way  
Harrisburg, PA 17110

Irwin Popowsky, Esq.  
Tanya McCloskey, Esq.  
Steven Steinmetz, Esq.  
Office of Consumer Advocate  
14th Floor, Strawberry Square  
Harrisburg, PA 17120

Paul Russell, Esq.  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

David Kleppinger, Esq.  
McNees, Wallace & Nurick  
PO Box 1166  
Harrisburg, PA 17108-1166

300 North 2nd Street  
Harrisburg, PA 17101

David M. Boonin  
President, Mid-Atlantic  
New Energy Ventures, Inc.  
200 S. Broad Street, Suite 800  
Philadelphia, PA 19102

Michael G. Banta, Esq.  
Vice President and  
Assistant General Counsel  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Ernest E. Jones, Esq.  
1207 Chestnut Street  
7th Floor  
Philadelphia, PA 19107

Steven P. Hershey, Esq.  
Petter Meadows, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

Donald A. Kaplan, Esq.  
Preston, Gates, et al.  
1735 New York Avenue, NW  
Washington, DC 20006-4759

W. Edwin Ogden, Esq.  
Alan Michael Seltzer, Esq.  
Ryan, Russell, Ogden & Seltzer  
1100 Berkshire Boulevard  
Suite 301  
Reading, PA 19610

Christopher B. Craig, Esq.  
Democratic Committee on Appropriations  
Room 545  
Main Capitol Building  
Harrisburg, PA 17120

Lance Haver  
6048 Ogontz Avenue  
Philadelphia, PA 19141

Angel L. Ortiz  
City Councilman  
City Hall - room 590  
Philadelphia, PA 19107

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

Richard LaCapra  
LaCapra Associates  
The Providence Building  
333 Washington Street  
Boston, MA 02108

William T. Hawke, Esq.  
Janet L. Miller, Esq.  
Todd S. Stewart, Esq.  
P.O. box 1778  
Harrisburg Energy Center  
Harrisburg, PA 17105-1778

The McFerren Corp.  
200 N. Third Street  
Suite 1100  
Harrisburg, PA 17101

Joseph A. Dworetzky, Esq.  
John P. Lavelle, Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square  
Twelfth Floor  
Philadelphia, PA 19103-6933

Bruce A. Connell, Esq.  
Dupont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Terrance FitzPatrick  
David DeSalle  
Ryan Russell Ogden & Seltzer  
800 N. Third Street  
Suite 101  
Harrisburg, PA 17102

Paul L. Zeigler, Esq.  
Zeigler & Zimmerman, PC  
344 N. 21st Street  
Suite 304  
PO Box 1080  
Camp Hill, PA 17011-3707

Linda C. Smith, Esq.  
Dilworth, Paxson, Kalish & Kauffman  
305 N. Front Street  
Suite 403  
Harrisburg, PA 17101-1236

Gary A. Jeffries, Esq.  
CNG Energy Services Corporation  
One Park Ridge Center  
PO Box 15746  
Pittsburgh, PA 15244-0746

Mr. Sam DeFrawi  
Director, Navy Rate Intervention  
Washington Navy Yard  
Building 212, Code 00RI  
901 M Street, S.E.  
Washington, DC 20374-5018

Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Meramec Avenue  
St. Louis, MO 63105

Michael L. Kessler  
Vice President & General Counsel  
American Energy Solutions, Inc.  
111 S. Alfred Street  
Alexandria, VA 22304

Audrey Van Dyke  
Associate Counsel (Litigation)  
Naval Facilities Engineering Command  
Washington Navy Yard  
Building 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Rufus L. Miley  
22 Leopard Run  
Glen Mills, PA 19342

Dated this 30th day of June, 1997.



Deborah A. Swanstrom  
Verner, Lipfert, Bernhard,  
McPherson and Hand  
901 15th Street, NW  
Suite 700  
Washington, DC 20005

Attorney for Allegheny Power

LAW OFFICES

WOLF, BLOCK, SCHORR AND SOLIS-COHEN

305 N. FRONT STREET  
HARRISBURG, PA 17101-1236

(717) 237-7160

FACSIMILE: (717) 237-7161

DIRECT DIAL NUMBER:  
(717) 237-7173

DOCUMENT  
FOLDER

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Paul R. Bonney, Esquire  
PECO  
2301 Market Street  
Philadelphia, PA 19101

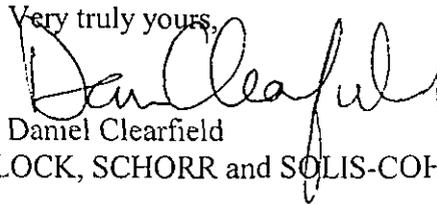
PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

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 Paul:

Enclosed are Enron's Sixth Set of Interrogatories to PECO in the above-captioned matter. I also enclose a disk as you have requested.

Very truly yours,



Daniel Clearfield

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

DC/lww

Enclosures

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA FAX AND FEDERAL EXPRESS

Paul R. Bonney  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103

VIA FIRST CLASS MAIL

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Comm.  
901 North 7th Street  
P.O. Box 3256  
Harrisburg, PA 17105-3265

David Kleppinger, Esquire  
Derrick Williamson, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101

Irwin Popowsky, Esquire  
Bernard A. Ryan, Esquire  
Office of Consumer Advocate  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120

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

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FOLDER

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Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer, Rebmann, Maxwell & Hippel, LLP  
204 State Street  
Harrisburg, PA 17101

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102

Janet Miller, Esquire  
Malatesta Hawke & McKeon  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

Christopher B. Craig, Esq.  
Democratic Committee on Appropriations  
Room 545, Main Capitol Bldg.  
Harrisburg, PA 17120

Donald Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Ave., NW  
Washington, DC 20006-4759

Alan Barak, Esquire  
Penn Energy Project  
Widener University School of Law  
3700 Vartan Way  
Harrisburg, PA 17110

Roger Clark, Esquire  
NESIP 905 Denston Drive  
Ambler, PA 19002-3901

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

David Boonin  
New Energy Venture  
200 South Broad Street, Suite 800  
Philadelphia, PA 19102

David M. Wise  
WiseEnergy  
615 Summitt Avenue  
Maplewood, NJ 07040

Joel D. Newton, Esquire  
Verner, Liipfert, Bernhard, McPherson & Hand  
901 15th Street, N.W., #700  
Washington, DC 20005-2301

Michael G. Banta, Esquire  
Indianapolis Power & Light  
One Monument Circle  
Indianapolis, Indiana 46204

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

Neil Talbot  
81 Grant Street, No. 5  
New York, NY 10013

Mr. Brian Kalcic  
Excel Consulting  
225 S. Meramec Ave., Suite 720T  
St. Louis, MO 63105

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood drive  
Winthrop, ME 04364

Richard LaCapra  
Lee Smith  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Assoc., Inc.  
12510 Prosperity Drive, Suite 350  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
18 Tremont Street, Suite 400  
Boston, MA 02108

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

  
Daniel Clearfield, Esq.

Dated: June 30, 1997



DEPARTMENT OF THE NAVY  
 NAVAL FACILITIES ENGINEERING COMMAND  
 LITIGATION HEADQUARTERS 09L  
 WASHINGTON NAVY YARD BUILDING 218  
 901 M STREET SE  
 WASHINGTON DC 20374-5018

IN REPLY REFER TO:

KJR

30 June 1997

Paul Bonney, Esq.  
 PECO Energy Company  
 Legal Department S23-1  
 2301 Market Street, P.O. Box 8699  
 Philadelphia, PA 19101

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

Dear Mr. Bonney:

Enclosed please find transcripts and exhibits from two prior proceedings in which our third expert has testified. Copies of the enclosed documents are not included in the copies sent to the service list, but will be upon request.

Sincerely,

AUDREY VAN DYKE  
 (Associate Counsel, Litigation)  
 Naval Facilities Engineering Command  
 Acting as Attorney for  
 the Secretary of the Navy  
 (202) 685-1931

cc:(w/o encl)  
 Service List

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COMMONWEALTH OF PENNSYLVANIA

DATE: July 1, 1997

SUBJECT: R-00973953

TO: Office of Administrative Law Judge

KJR

FROM: *WJZ* James J. McNulty, Deputy Prothonotary

PETITION OF PECO ENERGY COMPANY  
FOR APPROVAL OF RESTRUCTURING PLAN

---

Attached is copy of a Petition for Leave to Intervene and Participate of NorAm Energy Management, Inc. filed in connection with the above docketed proceeding.

This matter is assigned to your Office for appropriate action.

Attachment.

cc: OTS

wjz

DOCUMENT  
FOLDER

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JUL 02 1997



# PECO ENERGY

Legal Department

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

004154

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PROTHONOTARY'S OFFICE

Direct Dial: 215 841 4252

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna 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

July 1, 1997

## By Overnight Delivery

Paul E. Nordstrom, Esquire  
Verner, Liipfert Bernhard McPherson and  
Hand  
901 - 15<sup>th</sup> Street, N.W.  
Washington, DC 20005-2301

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 Paul:

Enclosed are PECO Energy Company's Answers to Allegheny Power's  
Interrogatories:

Set I: Allegheny-I-19, Allegheny-I-20 and Allegheny-I-21.

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)

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:

Allegheny Power's Interrogatories: Set I: Allegheny-I-19, Allegheny-I-20 and Allegheny-I-21.

Kenneth L. Mickens, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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. Furno)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

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Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortetzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summit Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Robert A. Mills, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
(Counsel for PRA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

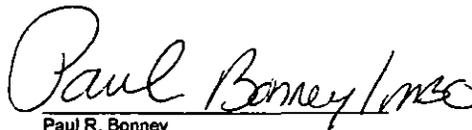
Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: July 1, 1997

MCNEES, WALLACE & NURICK  
ATTORNEYS AT LAW

BRUCE D. BAGLEY  
ALAN R. BOYNTON, JR.  
ERIC L. BROSSMAN  
ROBERT M. CHERRY  
LOUIS A. DEJOIE  
DAVID B. DISNEY  
MICHAEL A. DOCTROW  
ELIZABETH A. DOUGHERTY  
HARVEY FREEDENBERG  
JAMES L. FRITZ  
W. JEFFRY JAMOUNEAU  
MICHAEL G. JARMAN  
DONALD B. KAUFMAN  
STEPHEN R. KERN  
DAVID M. KLEPPINGER  
BERNARD A. LABUSKES, JR.  
DELANO M. LANTZ

DAVID E. LEHMAN  
FRANKLIN A. MILES, JR.  
ROBERT A. MILLS  
STEPHEN A. MOORE  
JOHN S. OYLER  
GARY A. RITTER  
DANA STEVENS SCADUTO  
RICHARD W. STEVENSON  
DIANE M. TOKARSKY  
CATHERINE E. WALTERS  
DAVID M. WATTS, JR.  
STEVEN J. WEINGARTEN  
NEAL S. WEST  
NORMAN I. WHITE  
LAWRENCE R. WIEDER  
WILLIAM M. YOUNG, JR.

100 PINE STREET  
P. O. BOX 1166  
HARRISBURG, PA 17108-1166  
TELEPHONE (717) 232-8000 FAX (717) 237-5300

1200 G STREET N.W.  
SUITE 800  
WASHINGTON, D.C. 20005  
TELEPHONE (202) 434-8991 FAX (202) 434-8707

<http://www.mwn.com>

OF COUNSEL  
ROBERT H. GRISWOLD  
FRANCIS B. HAAS, JR.  
RICHARD R. LEFEVER  
SAMUEL A. SCHRECKENGAUST, JR.

JENNIFER L. BAKER  
JEFFREY F. CHAMPAGNE  
JAMES P. DEANGELO  
JAMES P. DOUGHERTY  
KATHLEEN A. DUNST  
DEBRA P. FOURLAS  
HELEN L. GEMMILL  
ROBERT J. GODUTO  
SCOTT A. GOULD  
RANDOLPH B. HOUSTON, JR.  
BRIAN F. JACKSON  
BRIAN E. KAMOE  
MICHAEL R. KELLEY  
PETER F. KRIETE  
JAMES W. KUTZ  
MARCUS LEMON  
ANDREW L. LEVY

LOUISE HUTCHINSON MARA  
F. STEPHENSON MATTHES  
JON R. MOONEY  
SHARON R. PAXTON  
CHAD F. PHIPPS  
PAMELA C. POLACEK  
JONATHAN H. RUDD  
RANDALL R. SCHMIDT  
BRUCE R. SPICER  
CAROL A. STEINOUR  
SUSAN V. STEWART  
ROBERT F. TEPLITZ  
ROBERT A. WEISHAAR, JR.  
DERRICK P. WILLIAMSON  
JOHN A. WITHEROW, JR.  
KATHLEEN A. WOLOWSKI  
SAMUEL S. YUN

Writer's Direct Dial:

(717) 237-5446

E-Mail: [dwilliam@mwn.com](mailto:dwilliam@mwn.com)

MEM

July 2, 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**

Dear Paul:

Enclosed is the response of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Set III.

Very truly yours,

McNEES, WALLACE & NURICK

By *Derrick P. Williamson/jb*  
Derrick P. Williamson

0042  
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DPW/jb

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

KA14608115BONNEY13.LTR

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FOLDER

**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:**

Tanya J. McCloskey, Esq.  
Steven K. Steinmetz, Esq.  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Karen Oill Moury, Esq.  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

Daniel Clearfield, Esq.  
Alan C. Kohler, Esq.  
Wolf, Block, Schorr and Solis-Cohen  
305 North Front Street, Suite 401  
Harrisburg, PA 17101

Kenneth L. Mickens, Esq.  
Office of Trial Staff  
PA Public Utility Commission  
Pitnick Building, Third Floor  
901 North 7th Street, Rear  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Alan J. Barak, Esq.  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112

Christopher B. Craig, Esq.  
Office of Senator Vincent J. Furno  
Room 545, Main Capitol Building  
Harrisburg, PA 17120

Janet Miller, Esq.  
Malatesta, Hawke & McKeon  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778

Linda C. Smith, Esq.  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Craig A. Doll, Esq.  
214 State Street  
Harrisburg, PA 17101

Walter W. Cohen, Esq.  
Andrew J. Giorgione, Esq.  
Obermayer, Rebmann, Maxwell & Hippel  
204 State Street  
Harrisburg, PA 17101

Steven P. Hershey, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

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Paul E. Russell, Esq.  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

Mr. Lance S. Haver  
6048 Ogontz Avenue  
Philadelphia, PA 19141

Donald A. Kaplan, Esq.  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759

John L. Munsch, Esq.  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Michael L. Kessler  
Vice President and General Counsel  
American Energy Solutions, Inc.  
111 South Alfred Street  
Alexandria, VA 22314

Bruce A. Connell, Esq.  
DuPont Power Marketing, Inc.  
Legal Department  
600 North Dairy Ashford, ML-1034  
Houston, TX 77079

Joel D. Newton, Esq.  
Verner, Liipfert, Bernhard,  
McPherson & Hand  
901 - 15th Street, NW  
Washington, DC 20005-2301

Mr. David Boonin  
New Energy Ventures - Mid Atlantic  
1845 Walnut Street, Suite 2525  
Philadelphia, PA 19103

Terrance J. Fitzpatrick, Esq.  
David M. DeSalle, Esq.  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102-2025

Roger Clark, Esq.  
Environmentalists  
NESIP 905 Denston Drive  
Ambler, PA 19002-3901

Mr. Sam DeFrawi  
Director, Navy Rate Intervention  
Washington Navy Yard, Building 212  
Code 00RI  
901 M Street, SE  
Washington, DC 20374-5018

Audrey Van Dyke, Esq.  
Naval Facilities Engineering Command  
Washington Navy Yard, Building 218  
Room 200  
901 M Street, SE  
Washington, DC 20374-5018

Gary A. Jeffries, Esq.  
CNG Energy Services Corporation  
One Park Ridge Center  
P.O. Box 15746  
Pittsburgh, PA 15244-0746

CERTIFICATE OF SERVICE

Page 3

Joseph A. Dworetzky, Esq.  
John P. Lavelle, Jr., Esq.  
Hangley, Aronchick, Segal & Pudlin  
One Logan Square, Twelfth Floor  
Philadelphia, PA 19103

Usher Fogel, Esq.  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207

Paul L. Ziegler, Esq.  
Ziegler & Zimmerman, PC  
355 North 21st Street, Suite 304  
P.O. Box 1080  
Camp Hill, PA 17011

Joseph J. Malatesta, Jr., Esq.  
Lillian Smith Harris, Esq.  
Malatesta, Hawke & McKeon  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778

Susan Shanaman, Esq.  
Center for Energy and Econ. Dev.  
212 North Third Street, Suite 203  
Harrisburg, PA 17101-1505

Gordon Smith, Esq.  
John & Hengerer  
1200 17th Street, NW, Suite 600  
Washington, DC 20036-3006

Mr. Jerry Mendl  
MSB Energy Associates  
7507 Hubbard Avenue, Suite 200  
Middleton, WI 53562

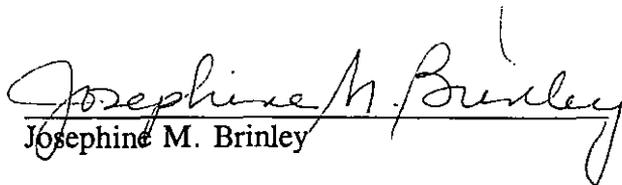
Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 South Meramec Avenue  
St. Louis, MO 63105

Mr. Richard LaCapra  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Mr. Thomas Catlin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

Mr. Richard Silkman  
163 Main Street  
Yarmouth, ME 04096

Mr. Peter Bradford  
P.O. Box 497  
Peru, VT 05152

  
Josephine M. Brinley

Dated this 2nd day of July, 1997, in Harrisburg, Pennsylvania.



Bruce A. Cornell  
General Counsel

97 JUL -8 AM 8:30

DuPont Power Marketing Inc.  
600 No. Dairy Ashford (77079) ML1034  
P.O. Box 4783  
Houston, TX 77210  
(281) 293-1736  
Fax: (281) 293-3826

RECEIVED  
PROTHONOTARY'S OFFICE

July 2, 1997

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

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 Judges Chestnut and Rainey:

DuPont Power Marketing Inc. ("DPMI") is an intervenor in the above-captioned proceeding. DPMI has decided to discontinue its individual participation in this proceeding. Instead, DPMI will pursue its interests in this matter through the Mid-Atlantic Power Supply Association ("MAPSA"), of which DPMI is a member company. MAPSA is an existing party in this proceeding.

Accordingly, DPMI hereby notifies you and all parties that DPMI will not be filing its own individual testimony nor participating in any other individual capacity in this proceeding. DPMI's involvement in the case will henceforth be entirely through MAPSA.

Notwithstanding the above, DPMI does respectfully request to remain on the service list in this proceeding.

Respectfully submitted,

cks  
Enc.

cc: All Parties (First Class Mail)  
James McNulty, Acting Prothonotary (First Class Mail)

DOCKETED

JUL 15 1997

DOCUMENT  
FOLDER

G:\COM\NEBA\1973953.LTR

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.

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Commission  
Office of Trial Staff  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(Counsel for PAIEG)

Karen Oil Moury, Esquire  
Assistant Small Business Advocate  
Suite 1102, Commerce Building  
300 N. 2nd Street  
Harrisburg, PA 17101

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance  
of Sr. Citizens & John Long, Jr.)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street; Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101  
(Counsel for AARP)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel  
LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Rm. 200  
901 M Street, S.E.  
Washington, DC 20374-5018  
(Counsel for Dept. of Navy)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689  
(Counsel for Allegheny Power)

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Joseph J. Malatesta, Jr., Esquire  
Lillian Smith Harris, Esquire  
Malatesta Hawke & McKeon LLP  
Harrisburg Energy Center  
100 North Tenth Street - P.O. Box 1778  
Harrisburg, PA 17105

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207  
(Counsel for Pennsylvania Petroleum  
Association)

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P.O. Box 1595  
Indianapolis, IN 46206-1595

Janet Miller, Esquire  
William T. Hawke, Esquire/Todd S. Stewart,  
Esq.  
Malatesta Hawke & McKeon  
100 N. Tenth Street -  
Harrisburg, PA 17105  
(Counsel/Mid-Atlantic Power Supply Assoc.)

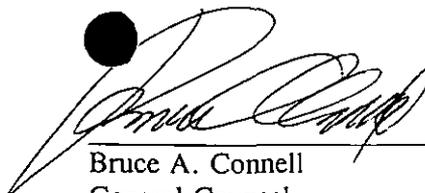
Joel D. Newton, Esquire  
Verner Liipfert Bernhard McPherson &  
Hand  
901 - 15th Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17th Street, NW - Suite 600  
Washington, DC 20036-3006  
(Duke Energy Trading and Marketing)

Joseph A. Dworetzky, Esquire  
John P. Lavelle, Jr., Esquire  
Hangley Aronchick Segal & Pudlin  
One Logan Squire - 12th Floor  
Philadelphia, PA 19102  
(Counsel for New Energy Ventures)

Paul R. Bonney  
Ward L. Smith  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103

Dated: July 2, 1997



---

Bruce A. Connell  
General Counsel  
DuPont Power Marketing Inc.  
600 North Dairy Ashford  
Houston, Texas 77079  
(281) 293-1736



**PECO ENERGY**

005010

Legal Department

PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101-8699  
215-841-5544: 59  
Fax 215 568 3389

97 JUL  
RECEIVED  
PROTHONOTARY'S OFFICE  
July 3, 1997

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

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

**By Overnight Delivery**

KJR

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 II: Enron-II-9

Sincerely,

Paul Bonney

PRB/rmt

Enclosures

cc: w/enclosures

James McNulty, Acting Prothonotary (Certificate of Service Only)

DOCUMENT  
FOLDER



# PECO ENERGY

Legal Department

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

005011

97 JUL -9 AM 9:00

July 3, 1997

RECEIVED  
PROTHONOTARY'S OFFICE

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
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Christine A. Reuther  
Wendy Schermer  
Susan E. Sciamanna  
Jenny P. Shulbank  
Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

## By Overnight Delivery

Paul E. Nordstrom, Esquire  
Verner, Liipfert Bernhard McPherson and  
Hand  
901 - 15<sup>th</sup> Street, N.W.  
Washington, DC 20005-2301

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 Paul:

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

Set I: Allegheny-I-22 and Allegheny-I-23.

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:

Enron's Interrogatories: Set II: Enron-II-9

Allegheny Power's Interrogatories: Set I: Allegheny I-22-23

Kenneth L. Mickens, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

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FOLDER

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortetzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summit Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: June 25, 1997

COMMONWEALTH OF PENNSYLVANIA

DATE: July 3, 1997

MEM

SUBJECT: R-00973953  
R-00973954

TO: Office of Administrative Law Judge

FROM: James J. McNulty, Deputy Prothonotary *ddt*

Attached is a copy of a Petition to Intervene filed by Vastar Power Marketing, Inc.

This Petition is being assigned to your Office for appropriate action.

Attachment

cc: Office of Trial Staff

ddt

DOCUMENT  
FOLDER  
JUL 07 1997

COMMONWEALTH OF PENNSYLVANIA

DATE: July 3, 1997

MEM

SUBJECT: R-00973953

TO: Office of Administrative Law Judge

FROM: James J. McNulty, Deputy Prothonotary *ddt*

Attached is a copy of a Petition to Intervene filed by Electric Clearinghouse, Inc.

This Petition is being assigned to your Office for appropriate action.

Attachment

cc: Office of Trial Staff

ddt

DOCUMENT  
FOLDER

DOCKETED  
JUL 07 1997

LAW OFFICES

WOLF, BLOCK, SCHORR AND SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING  
111 SOUTH 15TH STREET  
PHILADELPHIA, PA 19102-2678

004478  
(215) 977-2000  
FACSIMILE: (215) 977-2334

97 JUL -7 AM 10:45

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DIRECT DIAL NUMBER:  
(215) 977-2118

July 3, 1997

VIA HAND DELIVERY

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

DOCUMENT  
FOLDER

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 Ward:

Enclosed are Responses to PECO-Enron-V-1, 2, 3, 4, 5 and VI-15 (Objection), 18  
(w/attachments to PECO only), 19 and 22.

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

DSB:442261.1

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Responses to PECO-Enron-V-1, 2, 3, 4, 5 and VI-15 (Objection), 18 (w/attachments to PECO only), 19 and 22 upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

HAND DELIVERY

Ward L. Smith, Esquire  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103

DOCKETED

JUL 15 1997

004449

VIA FIRST CLASS MAIL

Kenneth L. Mickens, Esquire  
Pennsylvania Public Utility Comm.  
901 North 7th Street  
P.O. Box 3256  
Harrisburg, PA 17105-3265

David Kleppinger, Esquire  
Derrick Williamson, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

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97 JUL -7 AM 10:45

Christopher B. Craig, Esq.  
Democratic Committee on Appropriations  
Room 545, Main Capitol Bldg.  
Harrisburg, PA 17120

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101

Alan Barak, Esquire  
Penn Energy Project  
Widener University School of Law  
3700 Vartan Way  
Harrisburg, PA 17110

Irwin Popowsky, Esquire  
Bernard A. Ryan, Esquire  
Office of Consumer Advocate  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Petter Meadows, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

Donald Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Ave., NW  
Washington, DC 20006-4759

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899

Roger Clark, Esquire  
NESIP 905 Denston Drive  
Ambler, PA 19002-3901

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079

Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer, Rebmann, Maxwell & Hippel, LLP  
204 State Street  
Harrisburg, PA 17101

David Boonin  
New Energy Venture  
200 South Broad Street, Suite 800  
Philadelphia, PA 19102

Terence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102

Neil Talbot  
81 Grant Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summitt Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
225 S. Meramec Ave., Suite 720T  
St. Louis, MO 63105

Joel D. Newton, Esquire  
Verner, Liipfert, Bernhard, McPherson & Hand  
901 15th Street, N.W., #700  
Washington, DC 20005-2301

Michael G. Banta, Esquire  
Indianapolis Power & Light  
One Monument Circle  
Indianapolis, Indiana 46204

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood drive  
Winthrop, ME 04364

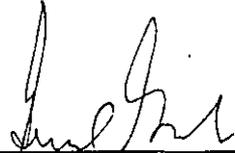
Janet Miller, Esquire  
Malatesta Hawke & McKeon  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778

Richard LaCapra  
Lee Smith  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Catlin  
Exeter Assoc., Inc.  
12510 Prosperity Drive, Suite 350  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
18 Tremont Street, Suite 400  
Boston, MA 02108

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



---

Gerald Gornish

Dated: July 3, 1997



**PECO ENERGY**

004554

97 JUL -7 AM 11:04

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
Vilna Waldron Gaston  
Gregory Golazeski  
John C. Halderman  
Mary McFall Hopper  
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Stephanie Whitton Lewis  
Jeffrey J. Norton  
Mark B. Peabody  
Roslyn G. Pollack  
Christine A. Reuther  
Wendy Schermer  
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Jenny P. Shulbank  
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Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

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June 30, 1997

KJR

**By Overnight Delivery**

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

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-24.

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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JUL 11 1997



# PECO ENERGY

004555'

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
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Assistant General Counsel

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JUL 11 1997

Derrick P. Williamson, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166

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 is PECO Energy Company's Answer to Philadelphia Area Industrial  
Energy Users Group's Interrogatory:

Set IX PAIEUG-IX-1.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

DOCUMENT  
FOLDER

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



# PECO ENERGY

004556

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
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Ward L. Smith  
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Assistant General Counsel

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June 30, 1997

## By Overnight Delivery

Usher Fogel, Esquire  
Rolland, Fogel, Loblenz & Carr, LLP  
1 Columbia Place  
Albany, NY 12207

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 Usher:

Enclosed is PECO Energy Company's Answer to the Pennsylvania Petroleum  
Association's Interrogatory:

Set I PPA-I-4.

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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# PECO ENERGY

004557

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
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Ward L. Smith  
Dawn Getty Sutphin  
Noel H. Trask  
Assistant General Counsel

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**By Overnight Delivery**

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

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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 Tanya:

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

Set XV: OCA-XV-20, OCA-XV-32 and OCA-XV-48.

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)



**PECO ENERGY**

004558

Legal Department

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

James W. Durham  
Senior Vice President  
and General Counsel

Sandra H. Byrne  
Legal Administrator

Paul R. Bonney  
Ellen M. Cavanaugh  
Edward J. Cullen, Jr.  
Todd D. Cutler  
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Ward L. Smith  
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Noel H. Trask  
Assistant General Counsel

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June 30, 1997

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**DOCKETED**

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

JUL 11 1997

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 IV: Enron-IV-3, Enron-IV-4 and Enron-IV-5.

Set V: Enron-V-11.

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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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:

Department of the Navy's Interrogatory: Set I Navy-I-24.

Pennsylvania Petroleum Association's Interrogatory: Set I PPA-I-4.

Office of Consumer Advocate's Interrogatory: Set XV: OCA-XV-20, OCA-XV-32 and OCA-XV-48..

Philadelphia Area Industrial Energy Users Group's Interrogatory: Set IX PAIEUG-IX-1.

Enron's Interrogatories: Set IV: Enron-IV-3, Enron-IV-4 and Enron-IV-5. Set V: Enron-V-11.

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JUL 11 1997

Kenneth L. Mickens, Senior Prosecutor  
Charles Shields, Prosecutor  
Office of Trial Staff  
P. O. Box 3256  
Harrisburg, PA 17105-3265

Derrick Williamson, Esquire  
David Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
Harrisburg, PA 17108-1166  
(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)

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 N. Front Street, Suite 401  
Harrisburg, PA 17101  
(Counsel for Enron)

Paul Russell, Esquire  
Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101  
(Counsel for PP&L)

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17101  
(Counsel for Delmarva Power & Light)

Alan J. Barak, Esquire  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112  
(Attorney for Environmentalists)

John L. Munsch, Esquire  
Allegheny Power  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

Bruce A. Connell, Esquire  
DuPont Power Marketing, Inc.  
Legal Department  
600 N. Dairy Ashford, ML-1034  
Houston, TX 77079  
(Counsel for DuPont Power Marketing, Inc.)

Tanya McCloskey, Esquire  
Steven K. Steinmetz, Esquire  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Steven P. Hershey, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

Donald A. Kaplan, Esquire  
Preston, Gates, et al.  
Suite 500  
1735 New York Avenue, NW  
Washington, DC 20006-4759  
(Counsel for PP&L)

Linda C. Smith, Esquire  
Dilworth, Paxson, Kalish & Kauffman  
305 North Front Street, Suite 403  
Harrisburg, PA 17101

Randall V. Griffin, Esquire  
Delmarva Power & Light Company  
800 King Street  
Wilmington, DE 19899  
(Counsel for Delmarva Power & Light)

Roger Clark, Esquire  
NESIP  
905 Denston Drive  
Ambler, PA 19002-3901

Paul E. Nordstrom, Esquire  
Joel D. Newton, Esquire  
Verner Lipfert Bernhard McPherson & Hand  
901 - 15<sup>th</sup> Street, NW  
Washington, DC 20005-2301  
(Counsel for Allegheny Power)

Michael G. Banta, Esquire  
Indianapolis Power & Light Company  
One Monument Circle  
P. O. Box 1595  
Indianapolis, IN 46206-1595

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Walter W. Cohen, Esquire  
Andrew J. Giorgione, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
204 State Street  
Harrisburg, PA 17101  
(Counsel for IPL)

Joseph A. Dwortatzky, Esq.  
John P. Lavell, Jr., Esq.  
Hangley Aronchick Segal & Pudlin  
One Logan Square - 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Terrence Fitzpatrick, Esquire  
David Desalle, Esquire  
Ryan, Russell, Ogden & Seltzer  
800 North Third Street, Suite 101  
Harrisburg, PA 17102  
(Counsel for GPU)

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

David M. Wise  
WiseEnergy  
615 Summil Avenue  
Maplewood, NJ 07040

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Merames Avenue  
St. Louis, MO 63105

Audrey Van Dyke, Associate Counsel  
Naval Facilities Engineering Command  
Washington Navy Yard, Bldg. 218, Room 200  
901 M Street, S.E.  
Washington, DC 20374-5018

Peter Bradford  
P. O. Box 497  
Peru, VT 05152

Usher Fogel, Esquire  
Roland, Fogel, Koblenz & Carr, LLP  
Albany, NY 12207  
(Counsel for PPA)

Robert A. Mills, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
(Counsel for PRA)

Barbara Alexander  
Consumer Affairs Consultant  
15 Wedgewood Drive  
Winthrop, ME 04364

Janet Miller, Esquire  
Malatesta Hawke & McKean  
100 N. Tenth Street  
Harrisburg, PA 17105  
(Counsel for Mid-Atlantic Power Supply Association)

Richard LaCapra/Lee Smith/Doug Smith  
LaCapra Associates  
The Province Building  
333 Washington Street  
Boston, MA 02108

Thomas Callin  
Exeter Associates, Inc.  
Suite 350  
12510 Prosperity Drive  
Silver Spring, MD 20904

Nancy Brockway, Esquire  
Suite 400  
18 Tremont Street  
Boston, MA 02108

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

Richard Silkman  
163 Main Street  
Yarmouth, Maine 04096

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154

Gordon J. Smith, Esquire  
John & Hengerer  
1200 17<sup>th</sup> Street, NW - Suite 600  
Washington, DC 20036-3006



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

Dated: June 30, 1997