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June 20, 1997

James J. McNulty, Prothonotary
PA Public Utility Commission
Room B 20, North Office Building
PO Box 3265
Harrisburg, PA 17105-3265

DOCUMENT
FOLDER

RE: In the Matter of PECO Energy Company's Restructuring Plan; Docket No.
R-00973953

Dear Mr. McNulty:

By prior Order of Administrative Law Judge Marlane R. Chestnut, the Center for Energy and Economic Development's Petition to Intervene in the above-captioned matter was granted. CEED was placed on the inactive party list. CEED did not object to said listing because it did not intend to pursue discovery or to file Direct Testimony in the case. However, CEED does wish to review the testimony of other parties to the proceeding, and does wish to reserve the right to file rebuttal or surrebuttal testimony should the facts warrant. Therefore, CEED hereby specifically requests that parties herein please send a copy of their testimony to the undersigned attorney, if they have not already done so, so that CEED can appropriately determine the need to file any rebuttal or surrebuttal testimony as a matter of presenting its unique interests.

Enclosed for your files are an original and three copies of this document. Copies of the document have been served in accordance with the attached certificate of service.

Kindly date stamp an enclosed copy and return in the SASE.

Any questions, please contact me.

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JUN 25 1997

Sincerely,



Susan M. Shanaman, Attorney for
The Center for Energy and Economic
Development

cc: Parties of Record
Hon. Marlane R. Chestnut
Hon. Charles E. Rainey, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the following persons by first class mail, postage prepaid.

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Dated: June 20, 1997

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

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

Dear Judges Chestnut and Rainey:

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

- (1) PAIEUG Statement 1 (the direct testimony and exhibits of Stephen J. Baron)
- (2) PAIEUG Statement 2 (the direct testimony and exhibits of Randall J. Falkenberg)
- (3) PAIEUG Statement 3 (the direct testimony and exhibits of Lane Kollen)

Honorable Marlane R. Chestnut
Honorable Charles E. Rainey, Jr.
June 20, 1997
Page 2

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

Very truly yours,

McNEES, WALLACE & NURICK

By 
Derrick P. Williamson

Counsel to the Philadelphia Area
Industrial Energy Users Group

DPW/ah
Enclosures

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

KA14608115CHESTNUT.LTR

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FOLDER

CERTIFICATE OF SERVICE

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

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Dated this 20th day of June, 1997, in Harrisburg, Pennsylvania.

COMMONWEALTH OF PENNSYLVANIA



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

Dear Prothonotary:

Enclosed is a certificate of service pursuant to 52 Pa. Code §5.342(d) certifying that on this date the Office of Small Business Advocate served the responses to Interrogatories, Nos. 1 through 12, propounded by PECO Energy Company in the above-captioned proceeding. A copy has been served on all parties of record.

Sincerely,

Karen Oill Moury
Assistant Small Business Advocate

Enclosure
cc: Parties of Record

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

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

Docket No. R-00973953

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CERTIFICATE OF SERVICE

JUN 26 1997

I certify that I am serving the responses on behalf of the Office of Small Business Advocate to PECO Energy Company interrogatories, Nos. 1 through 12, upon the persons addressed below:

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Date: June 20, 1997

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

Dear Prothonotary:

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

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

Sincerely,

Karen Oill Moury
Deputy Small Business Advocate

Enclosure

DOCKETED

JUN 26 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL DOCUMENT FOLDER

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

CERTIFICATE OF SERVICE

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

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Deputy Small Business Advocate

Date: June 20, 1997



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Direct Dial: 215 841 4252

June 20, 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 are PECO Energy Company's Answers to the Department of the
Navy's Interrogatories:

Set I Navy-I-7, Navy-I-23 and Navy-I-41.

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)

002874

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June 20, 1997

By Overnight Delivery

Paul E. Nordstrom, Esquire
Verner, Liipfert Bernhard McPherson and
Hand
901 - 15th 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

002678

Dear Paul:

Enclosed are PECO Energy Company's Answers to Allegheny Power's
Interrogatories:

Set I: Allegheny-I-13 and Allegheny-I-18.

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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Direct Dial: 215 841 4252

June 20, 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

Dear Tanya:

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

Set X: OCA-X-5 and OCA-X-8.

Set XV: OCA-XV-1 through OCA-XV-3, OCA-XV-6, OCA-XV-10, OCA-XV-11,
OCA-XV-14, OCA-XV-17, OCA-XV-22, OCA-XV-24 through OCA-XV-26, OCA-
XV-28, OCA-XV-29, OCA-XV-34, OCA-XV-40, OCA-XV-43, OCA-XV-46, OCA-
XV-50, OCA-XV-51 and OCA-XV-54.

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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June 20, 1997

By Overnight Delivery
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Community Legal Services
1424 Chestnut Street - 4th Floor
Philadelphia, PA 19102

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

Dear Steve:

Enclosed is PECO Energy Company's Answer to the Consumer Education & Protective Association's Interrogatory:

Set I: CEPA-I-9.

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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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 are PECO Energy Company's Answers to the Pennsylvania Petroleum
Association's Interrogatories:

Set I PPA-I-1 through PPA-I-3.

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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June 20, 1997

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Alan J. Barak, Esquire
1417 Blue Mountain Parkway
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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 Alan:

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

Set III Environmentalists-III-91 and Environmentalists-III-150.

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)

002679

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

Office of Consumer Advocate's Interrogatories: SET X 5, 8 SET XV: 1, 2, 3, 6, 10, 11, 14, 17, 22, 24, 25, 26, 28, 29, 34, 40, 43, 46, 50, 51 and 54
Department of the Navy's Interrogatories: Set I - 7, 23, 41

Environmentalists' Interrogatories: SET III: 91 and 150
Pennsylvania Petroleum SET I: 1, 2 and 3
CONSUMER EDUCATION & PROTECTIVE: SET I: #9
Allegheny: SET I: 13, 18

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Dated: June 20, 1997

KJR

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June 23, 1997

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PROTHONOTARY'S OFFICE
VIA FEDERAL EXPRESS

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

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**

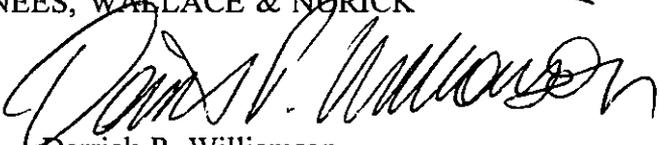
Dear Paul:

Enclosed is the response of Philadelphia Area Industrial Energy Users Group ("PAIEUG") to PECO Energy Company's Interrogatories and Document Requests - Set II, to Interrogatory 29.

Also enclosed are supplemental answers to PECO's Interrogatories and Requests for Production of Documents to PAIEUG - Set I, interrogatories 4, 5, 14, 15 and 16.

Very truly yours,

McNEES, WALLACE & NURICK

By 
Derrick P. Williamson

DPW/jb

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

CERTIFICATE OF SERVICE

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

VIA FIRST CLASS MAIL:

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CERTIFICATE OF SERVICE

Page 3

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Mr. Richard Silkman
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Yarmouth, ME 04096

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



Derrick P. Williamson

Dated this 23rd day of June, 1997, in Harrisburg, Pennsylvania.

R-973953

DOCKETED

JUN 26 1997

KJR

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing supplemental responses to interrogatories of PECO Energy Company - Set I of the Philadelphia Area Industrial Energy Users Group upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL:

Tanya J. McCloskey, Esq.
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Page 2

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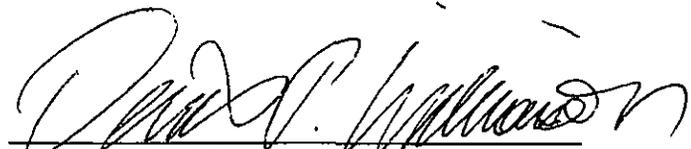
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Derrick P. Williamson

Dated this 23rd day of June, 1997, in Harrisburg, Pennsylvania.



PECO ENERGY

002688

Legal Department

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June 23, 1997

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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
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J. Lindsay Johnston
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Ward L. Smith
Dawn Getty Sulphin
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Assistant General Counsel

By Fax and First Class Mail

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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 Dan and Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories to Enron
Set II, numbered 1 through 50.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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

DOCUMENT
FOLDED

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.

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

Witness Steven J. Kean

1. Please provide a current resume for Mr. Kean.
2. As to all administrative and legislative proceedings of any kind in which Mr. Kean has submitted written or oral testimony or presented reports, articles or comments of any kind, please identify the nature of the proceeding, the party upon whose behalf the testimony/report was submitted, jurisdiction, year and docket number, and provide a brief summary of the issues addressed.
3. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Mr. Kean in the last 10 years in any utility rate proceeding involving a Pennsylvania utility.
4. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Mr. Kean in the last 5 years in any utility rate proceeding involving a utility other than a Pennsylvania utility.
5. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Mr. Kean in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the electric utility industry.
6. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Mr. Kean in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the natural gas utility industry.
7. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Mr. Kean in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the telephone utility industry.
8. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Mr. Kean, which have as their subject matter or which relate to competition in the electric utility industry. If all such articles have been provided in response to a previous interrogatory because

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those articles were submitted in an identified administrative or legislative proceeding, please so state.

9. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Mr. Kean, which have as their subject matter or which relate to competition in the natural gas utility industry. If all such articles have been provided in response to a previous interrogatory because those articles were submitted in an identified administrative or legislative proceeding, please so state.
10. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Mr. Kean, which have as their subject matter or which relate to competition in the telephone utility industry. If all such articles have been provided in response to a previous interrogatory because those articles were submitted in an identified administrative or legislative proceeding, please so state.

Witness John D. Mayo

11. Please provide a current resume for Dr. Mayo.
12. As to all administrative and legislative proceedings of any kind in which Dr. Mayo has submitted written or oral testimony or presented reports, articles or comments of any kind, please identify the nature of the proceeding, the party upon whose behalf the testimony/report was submitted, jurisdiction, year and docket number, and provide a brief summary of the issues addressed.
13. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Dr. Mayo in the last 10 years in any utility rate proceeding involving a Pennsylvania utility.
14. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Dr. Mayo in the last 5 years in any utility rate proceeding involving a utility other than a Pennsylvania utility.
15. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Dr. Mayo in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the electric utility industry.
16. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Dr. Mayo in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the natural gas utility industry.

17. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Dr. Mayo in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the telephone utility industry.
18. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Dr. Mayo, which have as their subject matter or which relate to competition in the electric utility industry. If all such articles have been provided in response to a previous interrogatory because those articles were submitted in an identified administrative or legislative proceeding, please so state.
19. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Dr. Mayo, which have as their subject matter or which relate to competition in the natural gas utility industry. If all such articles have been provided in response to a previous interrogatory because those articles were submitted in an identified administrative or legislative proceeding, please so state.
20. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Dr. Mayo, which have as their subject matter or which relate to competition in the telephone utility industry. If all such articles have been provided in response to a previous interrogatory because those articles were submitted in an identified administrative or legislative proceeding, please so state.

Witness Malcolm W. Jacobson

21. Please provide a current resume for Mr. Jacobson.
22. As to all administrative and legislative proceedings of any kind in which Mr. Jacobson has submitted written or oral testimony or presented reports, articles or comments of any kind, please identify the nature of the proceeding, the party upon whose behalf the testimony/report was submitted, jurisdiction, year and docket number, and provide a brief summary of the issues addressed.
23. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Mr. Jacobson in the last 10 years in any utility rate proceeding involving a Pennsylvania utility.
24. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Mr. Jacobson in the last 5 years in any utility rate proceeding involving a utility other than a Pennsylvania utility.

25. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Mr. Jacobson in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the electric utility industry.
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Witness Raymond W. Bowen

31. Please provide a current resume for Mr. Bowen.
32. As to all administrative and legislative proceedings of any kind in which Mr. Bowen has submitted written or oral testimony or presented reports, articles or comments of any kind, please identify the nature of the proceeding, the party upon whose behalf the testimony/report was submitted, jurisdiction, year and docket number, and provide a brief summary of the issues addressed.

33. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Mr. Bowen in the last 10 years in any utility rate proceeding involving a Pennsylvania utility.
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Witness Richard D. Tabors

41. Please provide a current resume for Dr. Tabors.
42. As to all administrative and legislative proceedings of any kind in which Dr. Tabors has submitted written or oral testimony or presented reports, articles or comments of any kind, please identify the nature of the proceeding, the party upon whose behalf the testimony/report was submitted, jurisdiction, year and docket number, and provide a brief summary of the issues addressed.
43. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Dr. Tabors in the last 10 years in any utility rate proceeding involving a Pennsylvania utility.
44. Please provide complete copies of all testimony, exhibits, reports, articles and comments submitted by Dr. Tabors in the last 5 years in any utility rate proceeding involving a utility other than a Pennsylvania utility.
45. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Dr. Tabors in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the electric utility industry.
46. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Dr. Tabors in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the natural gas utility industry.
47. Please provide complete copies of all testimony, exhibits, reports, articles, and comments submitted by Dr. Tabors in the last 5 years in all proceedings identified in response to Question 4, which have as their subject matter or which relate to competition in the telephone utility industry.
48. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Dr. Tabors, which have as their subject matter or which relate to competition in the electric utility industry. If all such articles have been provided in response to a previous interrogatory because those articles were submitted in an identified administrative or legislative proceeding, please so state.
49. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Dr. Tabors, which have as their subject matter or which relate to competition in the natural gas utility industry. If all such articles have been provided in response to a previous interrogatory

because those articles were submitted in an identified administrative or legislative proceeding, please so state.

50. Please provide complete copies of all articles, reports, comments, presentations or papers authored or co-authored by Dr. Tabors, which have as their subject matter or which relate to competition in the telephone utility industry. If all such articles have been provided in response to a previous interrogatory because those articles were submitted in an identified administrative or legislative proceeding, please so state.

Certificate of Service

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

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Derrick Williamson, Esquire
David Kleppinger, Esquire
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(Counsel for PAIEUG)

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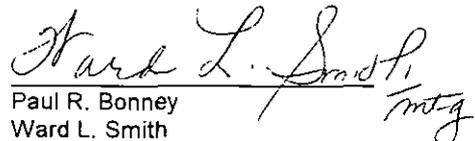
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Dated: June 23, 1997

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Linda C. Smith

June 24, 1997

02594

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

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

Dear Mr. Bonney:

Enclosed are the responses of the American Association of Retired Persons to PECO Energy Company's Interrogatories Regarding Market Price Assumptions Set MP-I - 1-22

Very truly yours,

Linda C. Smith/sdc
Linda C. Smith

LCS:sdc
Enclosures

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

97 JUN 25 AM 8:42
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CERTIFICATE OF SERVICE

I, Stacie Clark, Paralegal for 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 24, 1997.

VIA HAND DELIVERY AND FIRST CLASS MAIL

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Stacie Clark

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Linda C. Smith

June 24, 1997

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

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

Dear Mr. Bonney:

Enclosed are the responses of the American Association of Retired Persons ("AARP") to PECO Energy Company's Interrogatories - Set I, numbered 1 through 12.

As I had discussed with Mr. Ward Smith, AARP objected to some of the interrogatories due to the fact that they were burdensome. However, AARP has done their best to answer each interrogatory.

If there is any additional information that you are interested in please contact me and I will try to provide it for you.

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Dilworth, Paxson, Kalish & Kauffman LLP
To: Paul R. Bonney, Esquire

Page 2

The parties to this case are being served copies without the attached exhibits. Any party wishing to view the exhibits may do so at our office or request the exhibits to be mailed.

Very truly yours,

Linda C. Smith/sdc
Linda C. Smith

LCS:sdc
Enclosures

cc: Certificate of Service w/o exhibits
James J. McNulty, Prothonotary (Certificate of Service only)

CERTIFICATE OF SERVICE

I, Stacie Clark, Paralegal for 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 24, 1997.

VIA HAND DELIVERY AND FIRST CLASS MAIL

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June 24, 1997

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John C. Halderman
Mary McFall Hopper
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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 Counsel:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier Association) numbered 1 through 18.

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)

002950

97 JUN 26 AM 9:07
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PROTHONOTARY'S OFFICE

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APPLICATION OF PECO ENERGY	:	
COMPANY FOR APPROVAL OF A	:	
RESTRUCTURING PLAN AND	:	APPLICATION
CONSUMER EDUCATION PROGRAM	:	DOCKET NO. R-00973953
UNDER CHAPTER 28 OF THE PUBLIC:	:	
UTILITY CODE	:	

**INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS AND DATA
OF PECO ENERGY COMPANY
SET MP-II (Supplier Association)**

PECO Energy Company ("PECO") hereby propounds these Interrogatories and Requests for Production of Documents and Data (Set MP-II (Supplier Association)), to be answered by you or such other person or persons capable of responding to these Interrogatories and Requests and authorized to do so. Telephone or other contact concerning availability and timing of formal responses is encouraged. The answers should restate the question asked and indicate the person(s) supplying the information.

**DOCUMENT
FOLDER**

**DOCKETED
JUN 30 1997**

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.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APPLICATION OF PECO ENERGY	:	
COMPANY FOR APPROVAL OF A	:	
RESTRUCTURING PLAN AND	:	APPLICATION
CONSUMER EDUCATION PROGRAM	:	DOCKET NO. R-00973953
UNDER CHAPTER 28 OF THE PUBLIC:	:	
UTILITY CODE	:	

**INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS AND DATA
OF PECO ENERGY COMPANY
SET MP-II (Supplier Association)**

PECO Energy Company ("PECO") hereby propounds these Interrogatories and Requests for Production of Documents and Data (Set MP-II (Supplier Association)), to be answered by you or such other person or persons capable of responding to these Interrogatories and Requests and authorized to do so. Telephone or other contact concerning availability and timing of formal responses is encouraged. The answers should restate the question asked and indicate the person(s) supplying the information.

INTERROGATORIES AND DOCUMENT REQUESTS

Request No. 1. Please identify every member of your association whose interests you are representing in this proceeding.

Request No. 2. Identify and describe the exact dollar amount of PECO's stranded investment recovery that you propose that the Commission approve in this proceeding.

Request No. 3. If your response to Request No. 2 is anything other than that you propose that PECO should be allowed to recover 100% of its stranded investment, please describe how, and to what extent, the disallowance that you propose will benefit you and your shareholders. Please provide this information for every member of your association identified in response to Request No. 1.

Request No. 4. With regard to the benefits identified in response to Request No. 2, please explain why your shareholders, rather than PECO's shareholders, should receive those benefits. Please provide this information for every member of your association identified in response to Request No. 1.

Request No. 5. Please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the effect on you if PECO's request to recover stranded costs were approved. Please provide this information for every member of your association

identified in response to Request No. 1.

Request No. 6. For each member of your association identified in response to Request No. 1, please project your total revenue, net income, and profits from retail sales of electricity in Pennsylvania for the next eight years under two scenarios:

- (a) the Commission approves PECO's proposal in this proceeding regarding stranded costs; and
- (b) the Commission approves the position you assert in this proceeding regarding stranded costs.
- (c) Explain the reasons for the differences, if any, in total revenues, net income, and profits under these two scenarios.

Request No. 7. (a) For each member of your association identified in response to Request No. 1, identify and describe the prices for retail electric generation service (separately for industrial, commercial, residential, low-income, and Customer Assistance Program ("CAP") customers) that you expect to charge to customers for the next ten years under the two scenarios described in Request No. 6.

- (b) Explain the reasons for the price differences, if any.

Request No. 8. (a) For each member of your association identified in response to Request No. 1, identify and describe the nominal and percentage savings in energy and capacity (i.e., non-LDU) charges that you expect to provide to customers for the next ten years (state

separately for industrial, commercial, residential, low-income and CAP customers) under the two scenarios addressed in Request No. 6.

(b) Explain the reasons for the differences, if any, in the savings provided to customers.

(c) Explain the source of the savings under each scenario.

Request No. 9. State whether you believe that valid future estimates for the market clearing price of energy can be projected.

Request No. 10. Please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the future price of electric energy or capacity in a competitive retail market in the Mid-Atlantic region. Please provide this information for every member of your association identified in response to Request No. 1.

Request No. 11. (a) Identify and describe your best projection of as-delivered, competitive retail energy and capacity prices (including gross receipts tax) from 1997 through 2015 in PECO's service territory.

(b) Provide the factual basis and copies of any analyses or studies you possess or have conducted for the projections set forth in response to Request No. 11(a).

Request No. 12. (a) For each member of your organization identified in response to Request No. 1, 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.

Request No. 13. For each member of your organization identified in response to Request No. 1, identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you have made for the sale of energy or capacity to any retail customer located in PECO's service territory for any duration for the years from 1997 through 2015.

Request No. 14. For each member of your organization identified in response to Request No. 1, identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you have made for the sale of energy or capacity to any wholesale customer located in PECO's service territory for any duration for the years from 1997 through 2015.

Request No. 15. (a) For each member of your organization identified in response to Request No. 1, identify the highest price at which you would be willing currently to commit to buy on-peak wholesale energy and capacity from PECO.

(b) For each member of your organization identified in response to

Request No. 1, identify the highest quantity of energy and capacity to which you would be willing currently to commit to buy from PECO at the abovementioned price.

(c) For each member of your organization identified in response to Request No. 1, identify and describe the same information as in parts (a) and (b) for wholesale energy and capacity purchased from PECO 24 hours a day.

(d) For each member of your organization identified in response to Request No. 1, identify and describe the same information as in parts (a) and (b) to which you would be willing currently to commit for bilateral contracts with PECO for a period of: (i) one (1) year; (ii) two (2) years; (iii) five (5) years; (iv) ten (10) years; (v) fifteen (15) years; (vi) twenty (20) years; and (vii) thirty (30) years.

Request No. 16. (a) For each member of your organization identified in response to Request No. 1, state whether you intend to sell power into PECO's service territory below your cost or the market price

(b) If so, by how much?

Request No. 17 (a) For each member of your organization identified in response to Request No. 1, identify and describe if you ever have sold power below your cost, or below the general market price.

(b) If so, by how much.

Request No. 18. (a) For each member of your organization identified in response to Request No. 1, identify and describe if you ever have charged "loss leader" prices in any form.

(b) If so, identify and describe the "loss leader" prices you have charged.

Certificate of Service

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

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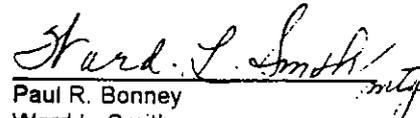
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Dated: June 24, 1997



PECO ENERGY

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Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

Direct Dial: 215 841 4252

June 24, 1997

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KJR

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

Dear Counsel:

Enclosed are two copies of PECO Energy Company's Interrogatories to the
Philadelphia Area Industrial Energy Users Group, Set MP-II (Industrial
Customers).

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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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APPLICATION OF PECO ENERGY	:	
COMPANY FOR APPROVAL OF A	:	
RESTRUCTURING PLAN AND	:	APPLICATION
CONSUMER EDUCATION PROGRAM	:	DOCKET NO. R-00973953
UNDER CHAPTER 28 OF THE PUBLIC	:	
UTILITY CODE	:	

**DOCUMENT
FOLDER**

**INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS AND DATA
OF PECO ENERGY COMPANY
SET MP-II (Industrial Customer)**

PECO Energy Company ("PECO") hereby propounds these Interrogatories and Requests for Production of Documents and Data (Set MP-II (Industrial Customer)), to be answered by you or such other person or persons capable of responding to these Interrogatories and Requests and authorized to do so. Telephone or other contact concerning availability and timing of formal responses is encouraged. The answers should restate the question asked and indicate the person(s) supplying the information.

DOCKETED

JUN 30 1997

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.

INTERROGATORIES AND DOCUMENT REQUESTS

Request No. 1. In your written pre-filed testimony served on June 20, 1997, you propose that PECO should not be allowed to recover its full stranded investment claim. Please describe how, and to what extent, the disallowance that you propose will benefit you and your shareholders. If the answer to this Request would be different for separate entities that you represent in this proceeding, please so state and provide separate responses for each entity whose answer would differ.

Request No. 2. With regard to the benefits identified in response to Request No. 1, please explain why your shareholders, rather than PECO's shareholders, should receive those benefits. If the answer to this Request would be different for separate entities that you represent in this proceeding, please so state and provide separate responses for each entity whose answer would differ.

Request No. 3. For each entity that is a member of your association and which you represent in this proceeding, please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the effect on you if PECO's request to recover stranded costs were approved.

Request No. 4. For each entity that is a member of your association and which you represent in this proceeding, please project your total revenue, net income, and profits for the next

eight years under two scenarios:

- (a) the Commission approves PECO's proposal in this proceeding regarding stranded costs; and
- (b) the Commission approves the position you assert in this proceeding regarding stranded costs.
- (c) Explain the reasons for the differences, if any, in total revenues, net income, and profits under these two scenarios.

Request No. 5. State whether you believe that valid future estimates for the market clearing price of energy can be projected.

Request No. 6. For each entity that is a member of your association and which you represent in this proceeding, please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the future price of electric energy or capacity in a competitive retail market in the Mid-Atlantic region.

Request No. 7. For each entity that is a member of your association and which you represent in this proceeding, identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you (or the customers you represent) have received for the retail sale of energy or capacity for any duration for the years from 1997 through 2015.

Request No. 8. For each entity that is a member of your association and which you represent in this proceeding, identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you (or the customers you represent) have received for the wholesale sale of energy or capacity for any duration for the years from 1997 through 2015.

Certificate of Service

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

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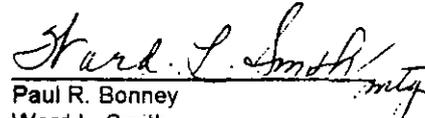
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(215) 841-6863

Dated: June 24, 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

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Legal Administrator

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Edward J. Cullen, Jr.
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Viina Waldron Gaston
Gregory Golazeski
John C. Halderman
Mary McFall Hopper
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Wendy Schermer
Susan E. Sciamanna
Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

DOCUMENT FOLDER DOCUMENT FOLDER

Direct Dial: 215 841 4252

June 24, 1997

MEM

By Fax and First Class Mail

Paul E. Russell, Esq.
Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, PA 18101

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

002952

Dear Paul:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier) numbered 1 through 17.

Sincerely,

Ward L. Smith
mtg

Paul Bonney
Ward L. Smith

DOCKETED

JUL 08 1997

RECEIVED
PROTHONOTARY'S OFFICE
9 JUN 26 AM 9:08

PRB/mtg

Enclosures

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



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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 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

Dear Dan and Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier) numbered 1 through 17.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

Bruce A. Connell, Esq.
Legal Department
600 N. Dairy Ashford, ML-1034
Houston, TX 77079

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 Bruce:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier) numbered 1 through 17.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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James McNulty, Acting Prothonotary (Certificate of Service Only)



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Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

Gordon J. Smith, Esq.
John & Hengerer
1200 17th Street, NW, Suite 600
Washington, DC 20036-3006

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. Smith:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier) numbered 1 through 17.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

Paul Nordstrom, Esq.
Joel Newton, Esq.
Verner Liipfert, Bernhard, McPherson & Hand
901 15th Street, NW
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 and Joel:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
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Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

Craig A. Doll, Esq.
214 State Street
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 Craig:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier) numbered 1 through 17.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

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

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 Randall:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
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Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

Joseph A. Dworetzky, Esq.
John P. Lavell, Jr., Esq.
Hangley Aronchick Segal & Pudlin
One Logan Square - 12th 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

Dear Counsel:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
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Sincerely,

Paul Bonney
Ward L. Smith

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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

Terence J. Fitzpatrick, Esq.
David M. DeSalle, Esq.
Ryan, Russell, Ogden & Seltzer LLP
800 North Third Street, Suite 101
Harrisburg, PA 17102-2025

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 Terry and Dave:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier) numbered 1 through 17.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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James McNulty, Acting Prothonotary (Certificate of Service Only)



PECO ENERGY

Legal Department

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2301 Market Street
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James W. Durham
Senior Vice President
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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 24, 1997

By Fax and First Class Mail

Michael G. Banta
Vice President and General Counsel
IP&L
One Monument Circle
P.O. Box 1595
Indianapolis, IN 46206

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 Michael:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II
(Supplier) numbered 1 through 17.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APPLICATION OF PECO ENERGY	:	
COMPANY FOR APPROVAL OF A	:	
RESTRUCTURING PLAN AND	:	APPLICATION
CONSUMER EDUCATION PROGRAM	:	DOCKET NO. R-00973953
UNDER CHAPTER 28 OF THE PUBLIC:		
UTILITY CODE	:	

**INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS AND DATA
OF PECO ENERGY COMPANY
SET MP-II (Supplier)**

PECO Energy Company ("PECO") hereby propounds these Interrogatories and Requests for Production of Documents and Data (Set MP-II (Supplier)), to be answered by you or such other person or persons capable of responding to these Interrogatories and Requests and authorized to do so. Telephone or other contact concerning availability and timing of formal responses is encouraged. The answers should restate the question asked and indicate the person(s) supplying the information.

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.

INTERROGATORIES AND DOCUMENT REQUESTS

Request No. 1. Identify and describe the exact dollar amount of PECO's stranded investment recovery that you propose that the Commission approve in this proceeding.

Request No. 2. If your response to Request No. 1 is anything other than that you propose that PECO should be allowed to recover 100% of its stranded investment, please describe how, and to what extent, the disallowance that you propose will benefit you and your shareholders.

Request No. 3. With regard to the benefits identified in response to Request No. 2, please explain why your shareholders, rather than PECO's shareholders, should receive those benefits.

Request No. 4. Please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the effect on you if PECO's request to recover stranded costs were approved.

Request No. 5. Please project your total revenue, net income, and profits from retail sales of electricity in Pennsylvania for the next eight years under two scenarios:

(a) the Commission approves PECO's proposal in this proceeding regarding stranded costs; and

(b) the Commission approves the position you assert in this proceeding regarding stranded costs.

(c) Explain the reasons for the differences, if any, in total revenues, net income, and profits under these two scenarios.

Request No. 6. (a) Identify and describe the prices for retail electric generation service (separately for industrial, commercial, residential, low-income, and Customer Assistance Program (“CAP”) customers) that you expect to charge to customers for the next ten years under the two scenarios described in Request No. 5.

(b) Explain the reasons for the price differences, if any.

Request No. 7. (a) Identify and describe the nominal and percentage savings in energy and capacity (i.e., non-LDU) charges that you expect to provide to customers for the next ten years (state separately for industrial, commercial, residential, low-income and CAP customers) under the two scenarios addressed in Request No. 5.

(b) Explain the reasons for the differences, if any, in the savings provided to customers.

(c) Explain the source of the savings under each scenario.

Request No. 8. State whether you believe that valid future estimates for the market clearing price of energy can be projected.

Request No. 9. Please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the future price of electric energy or capacity in a competitive retail market in the Mid-Atlantic region.

Request No. 10. (a) Identify and describe your best projection of as-delivered, competitive retail energy and capacity prices (including gross receipts tax) from 1997 through 2015 in PECO's service territory.

(b) Provide the factual basis and copies of any analyses or studies you possess or have conducted for the projections set forth in response Request No. 10(a).

Request No. 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.

Request No. 12. Identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you have made for the sale of energy or capacity to any retail customer located in PECO's service territory for any duration for the years from 1997 through

2015.

Request No. 13. Identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you have made for the sale of energy or capacity to any wholesale customer located in PECO's service territory for any duration for the years from 1997 through 2015.

Request No. 14. (a) Identify the highest price at which you would be willing currently to commit to buy on-peak wholesale energy and capacity from PECO.

(b) Identify the highest quantity of energy and capacity to which you would be willing currently to commit to buy from PECO at the abovementioned price.

(c) Identify and describe the same information as in parts (a) and (b) for wholesale energy and capacity purchased from PECO 24 hours a day.

(d) Identify and describe the same information as in parts (a) and (b) to which you would be willing currently to commit for bilateral contracts with PECO for a period of: (i) one (1) year; (ii) two (2) years; (iii) five (5) years; (iv) ten (10) years; (v) fifteen (15) years; (vi) twenty (20) years; and (vii) thirty (30) years.

Request No. 15. (a) State whether you intend to sell power into PECO's service territory below your cost or the market price

(b) If so, by how much?

Request No. 16 (a) Identify and describe if you ever have sold power below your cost, or below the general market price.

(b) If so, by how much.

Request No. 17 (a) Identify and describe if you ever have charged “loss leader” prices in any form.

(b) If so, identify and describe the “loss leader” prices you have charged.

Certificate of Service

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

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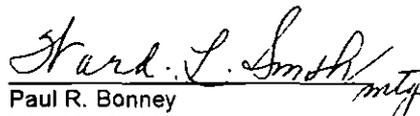
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Dated: June 24, 1997

CERTIFICATE OF SERVICE

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

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

Dated this 24th day of June, 1997.

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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 Counsel:

Enclosed are two copies of PECO Energy Company's Interrogatories Set MP-II (Residential
Customer), numbered 1 through 7.

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)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APPLICATION OF PECO ENERGY	:	
COMPANY FOR APPROVAL OF A	:	
RESTRUCTURING PLAN AND	:	APPLICATION
CONSUMER EDUCATION PROGRAM	:	DOCKET NO. R-00973953
UNDER CHAPTER 28 OF THE PUBLIC	:	
UTILITY CODE	:	

**DOCUMENT
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DOCKETED

**INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS AND DATA
OF PECO ENERGY COMPANY
SET MP-II (Residential Customer)**

JUN 30 1997

PECO Energy Company ("PECO") hereby propounds these Interrogatories and Requests for Production of Documents and Data (Set MP-II (Residential Customer)), to be answered by you or such other person or persons capable of responding to these Interrogatories and Requests and authorized to do so. Telephone or other contact concerning availability and timing of formal responses is encouraged. The answers should restate the question asked and indicate the person(s) supplying the information.

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.

INTERROGATORIES AND DOCUMENT REQUESTS

Request No. 1. Identify and describe the exact dollar amount of PECO's stranded investment recovery that you propose that the Commission approve in this proceeding.

Request No. 2. Please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the effect on you if PECO's request to recover stranded costs were approved.

Request No. 3. State whether you believe that valid future estimates for the market clearing price of energy can be projected.

Request No. 4. Please produce complete copies of all analyses performed by or for you which evaluate and/or seek to quantify the future price of electric energy or capacity in a competitive retail market in the Mid-Atlantic region.

Request No. 5. (a) Identify and describe your best projection of as-delivered, competitive retail energy and capacity prices (including gross receipts tax) from 1997 through 2015 in PECO's service territory.

(b) Provide the factual basis and copies of any analyses or studies you possess or have conducted for the projections set forth in response Request No. 5(a).

Request No. 6. Identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you (or the customers you represent) have received for the retail sale of energy or capacity for any duration for the years from 1997 through 2015.

Request No. 7. Identify and describe the terms (including price, quantity, duration and any other principal terms) of any offers you (or the customers you represent) have received for the wholesale sale of energy or capacity for any duration for the years from 1997 through 2015.

Certificate of Service

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

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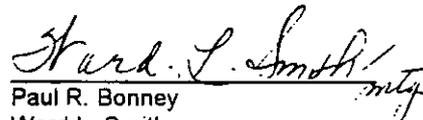
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Philadelphia, PA 19103
(215) 841-4252
(215) 841-6863

Dated: June 24, 1997



PECO ENERGY

Legal Department

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Assistant General Counsel

DOCUMENT
FOLDER

Direct Dial: 215 841 4252

June 24, 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

002
56

Dear Dan and Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories to Enron
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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PROTHONOTARY'S OFFICE
97 JUN 26 AM 9:08

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.

DOCUMENT
FOLDER

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

DOCKETED

JUN 30 1997

1. With regard to witness Steven J. Kean:
 - (a) Please state the first date on which you contemplated submitting written testimony on behalf of this witness.
 - (b) Please state the first date on which you contacted this witness regarding submitting written testimony in this proceeding.
 - (c) Please state the date on which drafting of the testimony of this witness began.
 - (d) Please state the date on which you determined that Enron would submit written testimony on behalf of this witness.

2. With regard to witness John W. Mayo:
 - (a) Please state the first date on which you contemplated submitting written testimony on behalf of this witness.
 - (b) Please state the first date on which you contacted this witness regarding submitting written testimony in this proceeding.
 - (c) Please state the date on which drafting of the testimony of this witness began.
 - (d) Please state the date on which you determined that Enron would submit written testimony on behalf of this witness.

3. With regard to witness Malcolm W. Jacobson:
 - (a) Please state the first date on which you contemplated submitting written testimony on behalf of this witness.
 - (b) Please state the first date on which you contacted this witness regarding submitting written testimony in this proceeding.

(c) Please state the date on which drafting of the testimony of this witness began.

(d) Please state the date on which you determined that Enron would submit written testimony on behalf of this witness.

4. With regard to witness Raymond W. Bowen:

(a) Please state the first date on which you contemplated submitting written testimony on behalf of this witness.

(b) Please state the first date on which you contacted this witness regarding submitting written testimony in this proceeding.

(c) Please state the date on which drafting of the testimony of this witness began.

(d) Please state the date on which you determined that Enron would submit written testimony on behalf of this witness.

5. With regard to witness Richard D. Tabors:

(a) Please state the first date on which you contemplated submitting written testimony on behalf of this witness.

(b) Please state the first date on which you contacted this witness regarding submitting written testimony in this proceeding.

(c) Please state the date on which drafting of the testimony of this witness began.

(d) Please state the date on which you determined that Enron would submit written testimony on behalf of this witness.

Certificate of Service

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

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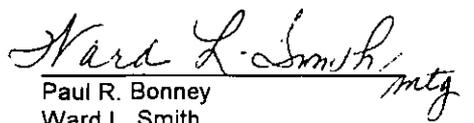
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Roland, Fogel, Koblenz & Carr, LLP
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(Counsel for Pennsylvania Petroleum Association)


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Ward L. Smith
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2301 Market Street, S23-1
Philadelphia, PA 19103
(215) 841-4252
(215) 841-6863

Dated: June 24, 1997



PECO ENERGY

Legal Department

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

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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 24, 1997

By Fax and First Class Mail

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

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

002958

Dear Mr. Smith:

Enclosed are two copies of PECO Energy Company's Interrogatories to Duke
Energy Trading and Marketing, Set MP-I.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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

97 JUN 26 AM 9:09
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INSTRUCTIONS

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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:

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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.

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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.

INTERROGATORIES AND DOCUMENT REQUESTS

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. 1(b).

(d) Produce all of the documents identified and/or described in Request No. 1(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.

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.

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.

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.

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.

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.

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.

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.

‡

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.

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.

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.

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.

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.

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.

Request No. 15. (a) State whether you intend to sponsor any assumptions in the current proceedings regarding the cost of sulfur dioxide (SO₂) 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.

Request No. 16. (a) State whether you intend to sponsor any assumptions in the current proceedings regarding the cost of nitrogen oxides (NO_x) 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.

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.

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.

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.

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.

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.

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.

Certificate of Service

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

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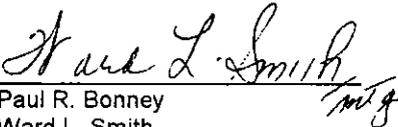
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(215) 841-6863

Dated: June 24, 1997



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

MEM

IN REPLY PLEASE
REFER TO OUR FILE

June 25, 1997

In Re: R-00973953,
R-00983953 C0001-C0007

(See letter dated 04/28/97)

PECO ENERGY COMPANY

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

NOTICE

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

Wednesday, August 13, 1997 at 7:00 p.m.

Arch Street Methodist Church
Broad and Arch Streets
PO Box 7347
Philadelphia, Pennsylvania 19107

Monday, August 18, 1997 at 7:00 p.m.

Norristown Borough Hall
Council Chambers
235 E Airy Street
Norristown, Pennsylvania 19401

Tuesday, August 19, 1997 at 7:00 p.m.

Council Meeting Room
1st Floor
Media Government Center Building
201 W Front Street
Media, Pennsylvania 19063

Monday, September 8, 1997 at 10:00 a.m.

"Coffeehouse"
2nd Floor
Student Center
Delaware Valley College
700 East Butler Avenue
Doylestown, Pennsylvania 18901

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Tuesday, September 9, 1997 at 10:00 a.m.

Goshen Fire Company
1320 Park Avenue
West Chester, Pennsylvania 19380

Wednesday, September 10, 1997 at 10:00 a.m.

In an Available Hearing Room
13th Floor
Philadelphia State Office Building
Broad and Spring Garden Streets
Philadelphia, Pennsylvania 19130

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

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

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

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



PECO ENERGY

Legal Department

PECO Energy Company
2301 Market Street
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215 841 5544
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Gregory Golazeski
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Jenny P. Shulbank
Ward L. Smith
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Assistant General Counsel

Direct Dial: 215 841 4252

June 25, 1997

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KJR

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

003148

Dear Audrey:

Enclosed are two copies of PECO Energy Company's Interrogatories to
Department of the Navy, Set II, numbered 1 and 2.

Sincerely,

Ward L. Smith

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.

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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 for the United States Department of the Navy
Set II

For Witness: Nicholas Phillips, Jr.

1. Re: Phillips Testimony, p. 22: Please explain in detail how "the allocations necessary to spread [ancillary services, system losses and imbalances] costs among load profiled customers" could "spill over to affect the bills of hourly metered customers for whom such allocations are not necessary."
2. Re: Phillips Testimony, p. 22: Please explain in detail how ancillary services, system losses and imbalances would be provided differently to hourly customers than to load profiled customers.

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Certificate of Service

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

Kenneth L. Mickens, Esquire
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Harrisburg, PA 17105-3265

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Ward L. Smith
Assistant General Counsel
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2301 Market Street, S23-1
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(215) 841-4252
(215) 841-6863

Dated: June 25, 1997

JOHN & HENGERER
A LAW PARTNERSHIP
1200 17TH STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20036-3006

ORIGINAL

June 25, 1997

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EDWARD W. HENGERER
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KIM M. CLARK
GORDON J. SMITH
SHELBY L. PROVENCHER

TELEPHONE
202/429-8809

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Via Overnight Mail

JUN 25 1997

MEM

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 Electric Clearinghouse, 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
Electric Clearinghouse, Inc.

DOCUMENT
FOLDER

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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Federal Express

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PA Public Utility Commission
Commwealth & North Street
North Office Building, RM B-20
Harrisburg, PA 17105-3625

SHIP DATE: 25JUN97
MAN-WGT: 3 LBS

REF: 305



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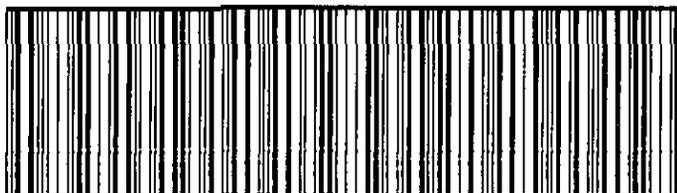
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PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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
ELECTRIC CLEARINGHOUSE, INC.**

This Petition for Leave to Intervene and Participate in the above-referenced proceeding is filed by Electric Clearinghouse, Inc. (ECI) pursuant to the Public Utility Commission's (Commission) Rules of Procedure and Practice, 52 Pa. Code § 5.71, *et. seq.*, and Prehearing Order No. 1. ECI 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 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3006
Telephone: (202) 429-8814
Facsimile: (202) 429-8805

David L. Cruthirds
ELECTRIC CLEARINGHOUSE, INC.
1000 Louisiana
Suite 5800
Houston, TX 77002-5050
Telephone: (713) 507-3761

II.

ECI is headquartered in Houston, Texas and is a subsidiary of NGC Corporation, which has subsidiaries involved in the gathering, processing and marketing of natural gas, natural gas liquids and crude oil. ECI is a marketer for electric power and provides value-added services for utility and non-utility generators. ECI also offers various risk management services to its customers, including options, swaps and other financial derivatives. ECI expects to contract for transmission service in connection with its business as a marketer, or buy from or sell to others that are receiving transmission service. ECI intends to serve customers on PECO Energy Company's (PECO) distribution system and has significant

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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, ECI will be directly and specifically affected by the outcome of this proceeding. ECI's interests in this proceeding cannot be adequately represented or protected by any other party hereto. Moreover, as a power marketer, ECI likely can contribute to the development of a complete record in this case as well as settlement discussions. Under the circumstances, ECI submits that good cause exists to grant it leave to intervene and participate herein.

At this early stage in the proceeding, ECI does not have any testimony. ECI 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, ECI requests that the Commission grant this Motion and that ECI 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 Electric Clearinghouse, 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 25, 1997

MCNEES, WALLACE & NURICK
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Writer's Direct Dial:
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June 25, 1997

ORIGINAL

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

VIA HAND DELIVERY

Re: **Pennsylvania Public Utility Commission v. PECO Energy Company;**
Docket No. R-00973953

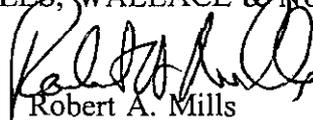
Dear Prothonotary McNulty:

Enclosed for filing please find the original and three (3) copies of the Petition of Pennsylvania Retailers' Association to Intervene in the above-referenced proceeding. As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and kindly return it for our filing purposes.

Respectfully submitted,

McNEES, WALLACE & NURICK

By


Robert A. Mills

Counsel to the Pennsylvania Retailers' Association

RAM/clc
Enclosures

c: Honorable Charles E. Rainey Jr.
Honorable Marlane R. Chestnut
Certificate of Service

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41

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

PECO ENERGY COMPANY

ORIGINAL

Docket No. R-00973953

**PETITION TO INTERVENE OUT OF TIME OF THE
PENNSYLVANIA RETAILERS' ASSOCIATION**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 52 Pa. Code §§ 5.71-5.74 and 52 Pa. Code § 5.61, the Pennsylvania Retailers' Association ("PRA") files this Petition to Intervene out of time in response to the Restructuring Plan filed by the PECO Electric Company ("PECO") pursuant to Section 2806(d) of the Electricity Generation Competition and Customer Choice Act, 66 Pa.C.S. § 2801, et seq ("Chapter 28" or "Act"). In support thereof, PRA states as follows:

1. Petitioner is the PRA. PRA is a statewide trade association established in 1932 representing retailers throughout the Commonwealth of Pennsylvania. PRA represents both small, independently owned retail stores and large retail chains. PRA's membership accounts for over 1500 store locations within the Commonwealth of Pennsylvania. PRA represents the interests of its members before the Pennsylvania General Assembly, the Governor's Office and various administrative agencies.

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2. The name and address of PRA's attorney is:

Robert A. Mills
McNEES, WALLACE & NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
(717) 237-5216

All correspondence in this proceeding from the Commission should be directed to the attention of Brian A. Rider, President of PRA at the following address:

Brian A. Rider, President
Pennsylvania Retailers' Association
224 Pine Street
Harrisburg, PA 17101-1325
(717) 233-7976

3. The respondent utility is:

PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699

4. On April 1, 1997, PECO filed with the Commission the "Application of PECO Energy Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code" ("Application" or "Restructuring Plan").

5. Through its Application, PECO requests, inter alia: (1) the recovery from ratepayers of 100% of \$6.805 billion in claimed transition or stranded costs; (2) the approval and imposition of unbundled rates, which include a Competitive Transition Charge ("CTC") designed to recover 100% of claimed stranded and transition costs from retail customers; (3)

the implementation of procedures to ensure direct access; (4) the implementation of a consumer education program; and (5) the implementation of an initial plan to meet universal service and energy conservation obligations.

6. In support of its Application, and the relief requested therein, PECO has filed and served supporting testimony that purports to validate its claim for \$6.805 billion in transition and stranded costs as well as the reasonableness of allowing PECO to recover 100% of these claimed costs from ratepayers. Further, PECO avers that its unbundling and stranded cost recovery proposals are rate cap compliant (with Section 2804(4) of the Act) and that the balance of its plan is otherwise compliant with pertinent provisions of Chapter 28.

7. PRA is concerned with a myriad of issues arising from PECO's Application. PRA reserves the right to raise and address various issues during the course of this proceeding; however, issues of immediate and primary concern to PRA include:

- **Transition or Stranded Costs:** PRA questions the reasonableness of PECO's transition and stranded cost claim and the methodologies and assumptions utilized to estimate that claim. Moreover, PRA believes that PECO's request for relief violates the Act insofar as it seeks a disproportionate recovery of claimed transition and stranded costs from retail customers. Only a just and reasonable level of quantified stranded or transition costs may be recovered from ratepayers.
- **Mitigation:** PRA questions whether PECO has effectively mitigated stranded costs, and provided a plan for mitigation in the future, in order to reasonably reduce the cost to be recovered through its CTC.
- **Unbundling/Allocation:** PRA questions whether PECO's proposed unbundling comports with the requirements of the Act and specifically the rate cap and the prohibitions against inter- and intra-class cost shifting.

- **Phase-In:** PRA seeks to assure that phase-in implementation does not cause any of its members to incur competitive disadvantages due to one customer participating in the phase-in who competes directly with a customer who is prevented from participating.

8. PRA realizes that substantial events have already occurred in this proceeding.

PRA accepts any schedules or rulings made to this point by the Administrative Law Judge.

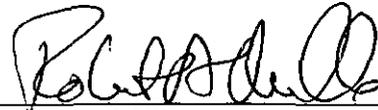
Furthermore, PRA asserts that its participation in this proceeding will not burden the other parties of the record.

WHEREFORE, the Pennsylvania Retailers' Association respectfully requests that the Commission grant this Petition to Intervene with full party status.

Respectfully submitted,

McNEES, WALLACE & NURICK

By _____



Robert A. Mills
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
(717) 237-5216

Counsel to the Pennsylvania Retailers' Association

Dated: June 25, 1997

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing Petition to Intervene of the Pennsylvania Retailers' Association upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL:

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CERTIFICATE OF SERVICE

Page 2

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CERTIFICATE OF SERVICE

Page 3

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VIA HAND DELIVERY

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



Robert A. Mills, Esquire

Dated this 25th day of June, 1997, in Harrisburg, Pennsylvania.

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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

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JUL 11 1997

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June 25, 1997

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Mary McFall Hopper
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Stephanie Whitton Lewis
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Roslyn G. Pollack
Christine A. Reuther
Wendy Schermer
Susan E. Sciamanna
Jenny P. Shulbank
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Noel H. Trask
Assistant General Counsel

By Fax and First Class Mail

Alan J. Barak, Esquire
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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

KJR

003119

Dear Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories to
Environmentalists, Set III, numbered 1 through 8.

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.

DOCUMENT
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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.

PECO Energy Company
Docket No. R-00973953
Interrogatories for the Environmentalists
Set III

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JUL 01 1997

For Witness: Bruce E. Biewald

1. Re: Statement No. 3, p. 5: Please identify the provision(s) in the Competition Act that vests the Commission with authority to "require all retail electricity suppliers selling in Pennsylvania to disclose their fuel mix and key air and other waste emissions to consumers in a standard and easy to comprehend label."
2. Please describe in detail the costs that would be required to implement Mr. Biewald's environmental tracking proposal.
3. Re: Statement No. 3, p. 5: How does Mr. Biewald propose that "[a] comprehensive program of consumer education on the environmental effects of electric production and use" be funded.
4. Re: Statement No. 3, p. 16: If the Independent System Operator ("ISO") is a FERC jurisdictional entity, how can the Commission order it to track environmental attributes?
5. Re: Statement No. 3, p. 16: If the ISO does not in fact run the energy market, how does Mr. Biewald propose that the ISO would obtain information on the environmental content of generation scheduled on the transmission system?
6. Re: Statement No. 3, p. 16: Please identify any presently available software capable of tracking environmental attributes and state the costs of acquiring and implementing such software.
7. Re: Statement No. 3, p. 16: Is it Mr. Biewald's belief that the environmental tracking obligations should equally apply to non-PJM Pennsylvania utilities?
8. Re: Statement No. 3, p. 16: Is it Mr. Biewald's belief that the environmental tracking obligations should equally apply to other suppliers or marketers regardless of whether their sources of energy are inside or outside PA? If so, please explain in detail how this would work and state the basis of the Commission's jurisdiction to order and monitor such parties' compliance with environmental tracking obligations.

Certificate of Service

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

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Democratic Committee on Appropriations
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(Counsel for New Energy Ventures)

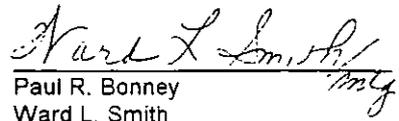
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William T. Hawke, Esquire/Todd S. Stewart, Esq.
Malatesta Hawke & McKeon
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Allegheny Power
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(Counsel for Pennsylvania Petroleum Association)



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 25, 1997



PECO ENERGY

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Todd D. Cutler
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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
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Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

**DOCUMENT
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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

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

Direct Dial: 215 841 4252
KJR

June 25, 1997

003150

Dear Dan and Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories to Enron Set V, numbered 1 through 23.

Sincerely,

Ward L. Smith

Paul Bonney
Ward L. Smith

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JUL 11 1997

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Enclosures

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

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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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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-00973753
Interrogatories for Enron
Set V

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For Witness: Paul D. Reising

1. Re: Statement No. 3, p. 18: Does Mr. Reising agree that transmission service in the PJM Control Area is presently provided under the poolwide PJM Open Access Transmission Tariff ("PJM Tariff") through the PJM Office of the Interconnection ("PJM OI")? If not, please state in detail the basis of his disagreement.
2. Re: Statement No. 3, p. 18: Is it Mr. Reising's contention that PECO is required to have a "retail" transmission tariff in addition to the existing PJM Tariff? If so, please explain in detail the basis for this belief.
3. Re: Statement No. 3, p. 18, lines 18-23: Please describe in detail the "concept" which Mr. Reising has in mind.
4. Re: Statement No. 3, p. 20: Is it Mr. Reising's belief that the PaPUC retains jurisdiction over unbundled transmission, and ancillary services related thereto, in a retail access environment? If so, please explain in detail the basis for this belief.
5. Re: Statement No. 3, p. 20: Please state the statutory or legislative authority for Mr. Reising's statement that the Commission should adjust "the transmission and related ancillary service components of PECO's unbundled rates . . ."
6. Re: Statement No. 3, p. 28: Please state in detail how Enron would charge its retail choice customers for transmission if Enron obtained transmission directly from the PJM OI.

For Witness: Lynn R. Coles

7. Re: Statement No. 7, p. 3: Please state in detail the factual bases of Ms. Coles' testimony that "PECO is proposing such policies to protect its service territory from the full impacts of competition"
8. Please explain Ms. Coles' understanding of how transmission service currently is scheduled over the transmission facilities of the PJM utilities.

9. Please explain Ms. Coles' understanding of how ancillary services currently are provided for transmission service over the facilities of the PJM utilities.
10. Please explain Ms. Coles' understanding regarding the current availability of transmission service under individual PJM company open access transmission tariffs.
11. Do individual PJM utilities offer ancillary services outside of the PJM Open Access Transmission Tariff ("PJM Tariff")? Please explain in detail the basis for this response.
12. Does Ms. Coles believe that PJM utilities are required to offer ancillary services outside of the PJM Tariff? Please explain in detail the basis for this response.
13. Re: Statement No. 7, p. 5: What is Ms. Coles' understanding of how differences between a transmission customer's transmission schedules and the amount of energy delivered to the PJM system by that customer are treated in PJM?
14. Re: Statement No. 7, p. 5: What is Ms. Coles' understanding of how differences between a transmission customer's transmission schedules and the amount of energy actually consumed by that customer's loads are treated in PJM?
15. Re: Statement No. 7, pp. 2-4: Assuming that all transmission service for delivering energy to retail choice load is arranged directly with the PJM Office of Interconnection ("PJM OI"), is there any further need for a separate "retail" transmission tariff?
16. Assuming that Enron obtains transmission service directly from the PJM OI to serve retail choice load in the PJM Control Area, how does Enron propose to recover the transmission costs incurred from such customers?
17. Does Enron intend to unbundle all transmission costs from the price of energy in its bills to retail choice customers? If not, please explain why Enron does not intend to do so.
18. Re: Statement No. 7, p. 9: Please identify all reports, studies and workpapers obtained or developed by Enron with respect to PJM hourly energy prices, and which form the basis of Ms. Coles' testimony on such prices.
19. Re: Statement No. 7, p. 11: Please explain in detail why the Code of Conduct proposed by PECO would not safeguard against PECO's marketing arm's utilization of each Supplier's ADLC for marketing intelligence to the detriment of suppliers.

20. Re: Statement No. 7, pp. 8 and 11-12: Please describe in detail how Ms. Coles proposes to implement her "much simpler and less costly" approach to "energy imbalance" under the presently existing rules of the PJM Interconnection ("PJM Rules").
21. Re: Statement No. 7, pp. 11-12: Is Ms. Coles proposing the creation of some type of "after-market" in which suppliers would trade unders and overs? If so, please describe in detail: (1) how this market would operate; (2) who would administer this market; (3) what costs are associated with the administration of such a market; (4) how net unders or overs would be charged or credited to suppliers; (5) who would determine the allocation of such net amounts to suppliers; (6) and how the EDC would be made whole through this process.
22. Re: Statement No. 7, p. 20: Please state in detail how Enron proposes to meet its reliability obligations to serve Pennsylvania retail choice customers during "the transition period."
23. Re: Statement No. 7, p. 20: Does Enron agree that it has an obligation under existing PJM Rules to meet certain capacity obligations for serving load located in the PJM Control Area? If not, please explain in detail the basis of Enron's disagreement. If yes, please state Ms. Coles' understanding as to what the PJM Rules require.

Certificate of Service

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

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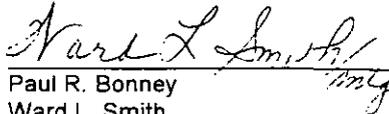
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Dated: June 25, 1997



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Assistant General Counsel

June 25, 1997

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

KJR

003191

Dear Alan:

Enclosed are two copies of PECO Energy Company's Interrogatories to Environmentalists, Set II, numbered 1 through 19.

Sincerely,

Ward L. Smith
mtg

Paul Bonney
Ward L. Smith

DOCUMENT
FOLDER

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97 JUN 27 AM 9:33

PRB/mtg

Enclosures

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

DOCKETED

JUL 11 1997

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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
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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 01 1987

PECO ENERGY COMPANY

DOCKET NO. R-00973953

INTERROGATORIES AND DOCUMENT REQUESTS
TO THE ENVIRONMENTALISTS

SET II

DOCUMENT
FOLDER

Witness Roger Colton

1. Please provide a list of all articles, papers, reports, comments and speeches written, published, submitted or delivered by Mr. Colton during the past ten years on the subject of consumer education and/or information outreach to consumers and provide complete copies of all such materials for the past three years.
2. Please describe your experience with the design of consumer education programs.
3. Please identify and describe what you believe to have been a successful consumer education and/or information outreach program. Explain why you believe the program was successful. Please provide copies of or complete citations to all research, articles, testimony, books, or other documents that you possess or are aware of regarding this program.
4. Please provide a complete copy of the 1988 Drew Hyman report on low-income fuel assistance described in Mr. Colton's testimony, at p.6, lines 1-20.
5. Please provide a complete copy of the 1988 U.S. General Accounting Office study referred to in Mr. Colton's testimony, at p.7, lines 5-17.
6. Please provide a complete copy of the study (and any written results of the study) you performed for the Colorado Energy Assistance Foundation regarding non-participation in LIHEAP in Colorado, as described in Mr. Colton's testimony on p.7, lines 20-27.
7. Mr. Colton states at p.2, lines 3-14, that the purpose of his testimony is to evaluate two components of PECO Energy Company's restructuring plan, including its proposed consumer education program, "as it relates to low-income customers." Please state whether Mr. Colton intended that Exhibit RDC-3, the Summary of Consumer Education Recommendations, apply to low-income consumers only, or to all consumers in PECO Energy Company's service territory.
8. Please provide a complete copy of the study described by Mr. Colton at p. 8, lines 21-30. The study was performed by the Center on Budget and Policy Priorities and examined why elderly households did not participate in the LIHEAP program.

9. Please provide a complete copy of the April 1997 report by the Pew Charitable Trusts referred to by Mr. Colton at p.9, lines 2-13.
10. Please identify the "wise consumer educator" referred to by Mr. Colton at p. 11, lines 10-12.
11. In Mr. Colton's testimony at p.11, lines 23-26, he states that "an effective education program needs to determine what the consumers need to learn rather than what PECO Energy Company wants to teach."
 - a. In Mr. Colton's opinion, what, specifically, do consumers "need to learn" about restructuring?
 - b. Please identify and provide complete copies of all research relied upon by Mr. Colton in formulating his opinion on what consumers need to learn about restructuring.
12. In Mr. Colton's testimony, p. 11, lines 12-15, Mr. Colton states that "[o]ne of the basic precepts to effective education is that an effective education program must begin with each person's needs, knowledge and experience..."
 - a. Please identify and describe what, in Mr. Colton's opinion, are effective, valid methods for determining "each person's needs, knowledge and experience."
13. In Mr. Colton's testimony, p.13, lines 16-25, he states that "the need for consumer education is five-fold," and then lists the five "needs."
 - a. Please provide complete copies of all research, articles, books or other documents or data Mr. Colton relied on in arriving at the five needs specified.
14. In Mr. Colton's testimony, p.13, lines 23-24, Mr. Colton states that the fifth need for consumer education is "[t]o motivate consumers to engage in the decision-making ('not making a choice is not okay')."
 - a. Is it Mr. Colton's position that consumers who have been effectively educated will switch from their current generation supplier to an alternative generation supplier? If not, please explain what Mr. Colton means when he says that "not making a choice is not okay."
 - b. Is it Mr. Colton's position that the success of a consumer education program should be measured, in whole or in part, by how many consumers switch to an alternative generation supplier?

15. What are the measurement criteria or benchmarks Mr. Colton believes should be applied to evaluate the success of PECO Energy Company's consumer education program?
16. Please provide complete copies of all research and data that support Mr. Colton's suggestions at p.16, lines 16-32, that teaching employers and agencies to provide information to employees and clients about restructuring would be: (a) effective; and (b) more effective than outreach through a speakers bureau.
17. Please provide complete copies of the "substantial research" Mr. Colton refers to at p. 17, lines 1-17, that "reveals that low-income households tend to join fewer organizations ... than persons in higher socio-economic brackets." Does the term "organizations" as used at this point in Mr. Colton's testimony include religious organizations?
18. In Mr. Colton's opinion, should the PUC have a role in consumer education programs? If yes, please describe that role in detail. If no, explain why not.
19. In Mr. Colton's opinion, is there a role for a state-wide consumer education program in Pennsylvania? If yes, please describe that role in detail. If no, explain why not.

Certificate of Service

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

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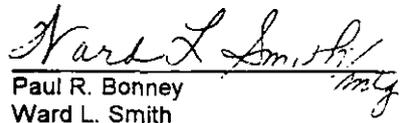
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Dated: June 25, 1997



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

DOCUMENT
FOLDER

KJR

00315

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

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Sincerely,

Ward L. Smith
Paul Bonney
Ward L. Smith

DOCKETED
JUL 11 1997

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97 JUN 27 AM 9:34

PRB/mtg

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James McNulty, Acting Prothonotary (Certificate of Service Only)

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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 THE OFFICE OF CONSUMER ADVOCATE
SET II

Witness Barbara Alexander

1. Please provide a list of all articles, papers, reports, comments and speeches written, published, submitted or delivered by Ms. Alexander during the past ten years on the subject of consumer education and/or information outreach to consumers and provide copies of all such materials for the past three years.
2. Please describe your experience with the design of consumer education programs.
3. Please identify and describe what you believe to have been a successful consumer education and/or information outreach program. Explain why you believe the program was successful. Please provide copies of or complete citations to all research, articles, testimony, books, or other documents that you possess or are aware of regarding this program.

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Certificate of Service

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

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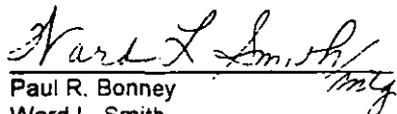
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Dated: June 25, 1997