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Jeffrey J. Norton
Mark B. Peabody
Roslyn G. Pollack
Christine A. Reuther
Wendy Schermer
Susan E. Sciamanna
Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

DOCKETED

JUN 16 1997

Direct Dial: 215 841 4252

June 11, 1997

By Overnight Delivery

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

**DOCUMENT
FOLDER**

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

Dear Linda:

Enclosed are PECO Energy Company's Answers to American Association of Retired Persons' Interrogatories:

Set I AARP-I-5 and AARP-I-40.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

00010

97 JUN 13 AM 9:53
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Kenneth L. Mickens, Senior Prosecutor
Office of Trial Staff
Pennsylvania Public Utility Commission
901 North 7th Street Rear
Harrisburg, PA 17120

DOCUMENT FOLDER

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

000102

Dear Ken:

Enclosed is PECO Energy Company's Answer to the Office of Trial Staff's
Interrogatory:

OTS-RS-16.

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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Assistant Small Business Advocate
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FOLDER

Direct Dial: 215 841 4252

June 11, 1997

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

Dear Karen:

Enclosed is PECO Energy Company's Answer to the Office of Small Business
Advocate's Interrogatory:

Set I OSBA-I-23.

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

Sincerely,

Paul Bonney/mbo

Paul Bonney

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JUN 16 1997

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PRB/mbo

Enclosures

cc: w/enclosures

Certificate of Service (w/enclosure)

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Direct Dial: 215 841 4252

June 11, 1997

DOCKETED

JUN 16 1997

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

000100

Dear Audrey:

Enclosed are PECO Energy Company's Answers to the Department of the
Navy's Interrogatories:

Set I Navy-I-1, Navy-I-2, Navy-I-3, Navy-I-10, Navy-I-15, Navy-I-17 and Navy-I-
38.

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 11, 1997

By Overnight Delivery

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

DOCUMENT
FOLDER

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

Dear Tanya:

Enclosed is PECO Energy Company's Answer to the Office of Consumer
Advocate's Interrogatory:

Set XIII OCA-XIII-6.

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

Sincerely,

Paul Bonney

DOCKETED
JUN 16 1997

PRB/mbo
Enclosures

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

000099

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97 JUN 13 AM 9:52

Certificate of Service

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

Office of Consumer Advocate's Interrogatory: Set XIII OCA-XIII-6..

Office of Trial Staff's Interrogatory: OTS-RS-16.

Office of Small Business Advocate's Interrogatory: Set I OSBA-I-23.

American Association of Retired Persons' Interrogatories: Set I AARP-I-5 and AARP-I-40.

Department of the Navy's Interrogatories: Set I Navy-I-1, Navy-I-2, Navy-I-3, Navy-I-10, Navy-I-15, Navy-I-17 and Navy-I-38.

Kenneth L. Mickens, Senior Prosecutor
Charles Shields, Prosecutor
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000104

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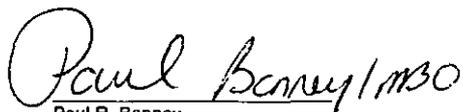
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Dated: June 11, 1997

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*ALSO ADMITTED TO FLORIDA BAR

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EDMUND A. KOBLENZ
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June 11, 1997

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2301 Market Street
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Philadelphia, PA 19101-8699

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JUN 16 1997

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

Dear Mr. Bonney:

Enclosed are the Pennsylvania Petroleum Association's Answers to PECO Energy
Company's Interrogatories - Set I, PECO 1-12.

Very truly yours,



Usher Fogel

UF/mac
Enclosure

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

CERTIFICATE OF SERVICE

000055

97 JUN 13 AM 9:41

Re: Pennsylvania Public Utility Commission
v.
PECO Energy Company
(Application for Approval of a Restructuring Plan)
Docket No. R-00973953

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I hereby certify that I have this day served the foregoing document,
"Answers of Pennsylvania Petroleum Association to PECO Energy Company's
Interrogatories - Set I, PECO 1-12", by first class mail, postage prepaid, upon the parties
of record in this proceeding.

Dated at Albany, New York, this 11th day of June, 1997.

Paul R. Bonney, Esq.
Assistant General Counsel
Noel H. Trask, Esq.
PECO Energy Company
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Senior Prosecutor
Charles D. Shields, esq.
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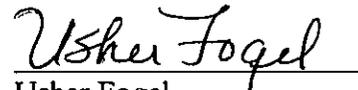
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Houston, TX 77079

Mr. Sam DeFrawi
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Intervention
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Usher Fogel

Counsel for Pennsylvania

Petroleum Association

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Albany, New York 12207

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FAX: (518) 434-3232

DOCUMENT
FOLDER

CERTIFICATE OF SERVICE

R-913953

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JUN 16 1997

000020

I hereby certify that I am this day serving a true copy of the foregoing letter 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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Page 2

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CERTIFICATE OF SERVICE

Page 3

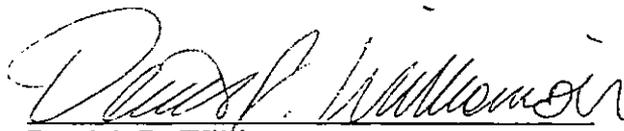
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One Park Ridge Center
P.O. Box 15746
Pittsburgh, PA 15244-0746

Mr. Lance S. Haver
6048 Ogontz Avenue
Philadelphia, PA 19141


Derrick P. Williamson

Dated this 12th day of June, 1997, in Harrisburg, Pennsylvania.



PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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Ellen M. Cavanaugh
Edward J. Cullen, Jr.
Todd D. Cutler
Viola Waldron Gaston
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John C. Halderman
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Stephanie Whitton Lewis
Jeffrey J. Norton
Mark B. Peabody
Roslyn G. Pollack
Christine A. Reuther
Wendy Schermer
Susan E. Sciamanna Foehl
Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 12, 1997

KJR

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

Dear Paul:

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

Set I Allegheny-I-14, Allegheny-I-16 and Allegheny-I-17.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

000532

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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

Direct Dial: 215 841 4252

Sandra H. Byrne
Legal Administrator

June 12 1997

Paul R. Bonney
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Edward J. Cullen, Jr.
Todd D. Cutler
Vilna Waldron Gaston
Gregory Golazeski
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Mary McFall Hopper
Stephen L. Huntoon
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J. Lindsay Johnston
Conrad O. Kattner
Stephanie Whitton Lewis

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Alan J. Barak, Esquire
1417 Blue Mountain Parkway
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Jeffrey J. Norton
Mark B. Peabody
Roslyn G. Pollack
Christine A. Reuther
Wendy Schermer
Susan E. Sciamanna Foehl
Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

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

Dear Alan:

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

Set II Environmentalists-II-112, Environmentalists-II-114, Environmentalists-II-116, Environmentalists-II-118, Environmentalists-II-119 and Environmentalists-II-121 through Environmentalists-II-126.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

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PECO ENERGY

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Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 12, 1997

By Overnight Delivery

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

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

Dear Derrick:

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

Set II Enron-II-1 and Enron-II-8.

Set III Enron-III-10.

Set IV Enron-IV-6.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

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Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 12, 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-11, Navy-I-12, Navy-I-16, Navy-I-18, Navy-I-20 and Navy-I-21.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

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PECO ENERGY

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James W. Durham
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Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 12, 1997

By Overnight Delivery

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

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

Dear Derrick:

Enclosed are PECO Energy Company's Answers to Philadelphia Area Industrial
Energy Users Group's Interrogatories:

Set VIII PAIEUG-VIII-3 through PAIEUG-VIII-6.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

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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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Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 12, 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 III: OCA-III-3 (**Revised**), OCA-III-17 (**Supplement**).

OCA Informal Request - 1

Set IX: OCA-IX-4.

Set XIII: OCA-XIII-10.

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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Certificate of Service

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

Office of Consumer Advocate's Interrogatory: Set III: OCA-III-3 (Revised), OCA-III-17 (Supplement). OCA Informal Request - 1 Set IX: OCA-IX-4, Set XIII: OCA-XIII-10.

Department of the Navy's Interrogatories: Set I Navy-I-11, Navy-I-12, Navy-I-16, Navy-I-18, Navy-I-20 and Navy-I-21.

Philadelphia Area Industrial Energy Users Group's Interrogatories: Set VIII PAIEUG-VIII-3 through PAIEUG-VIII-6.

Allegheny Power's Interrogatories: Set I Allegheny-I-14, Allegheny-I-16 and Allegheny-I-17.

Enron's Interrogatories: Set II Enron-II-1 and Enron-II-8.

CEPA's Interrogatories Set I: CEPA-I-1 through CEPA-I-8. Set II: CEPA-II-1 and CEPA-II-2.

Environmentalists' Interrogatories: Set II Environmentalists-II-112, Environmentalists-II-114, Environmentalists-II-116, Environmentalists-II-118, Environmentalists-II-119 and Environmentalists-II-121 through Environmentalists-II-126.

Kenneth L. Mickens, Senior Prosecutor
Charles Shields, Prosecutor
Pennsylvania Public Utility Commission
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One Monument Circle
P.O. Box 1595
Indianapolis, IN 46206-1595

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(Counsel for PPA)

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Boston, MA 02108

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

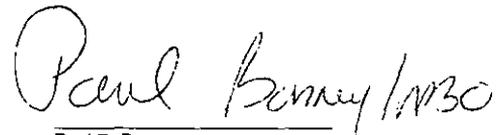
Nancy Brockway, Esquire
Suite 400
18 Tremont Street
Boston, MA 02108

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

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CNG Energy Services Corporation
One Park Ridge Center
P.O. Box 15746
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Ralph Smith
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Livonia, MI 48154



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

Dated: June 12, 1997

ORIGINAL

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RYAN, RUSSELL, OGDEN & SELTZER LLP

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W. EDWIN OGDEN
ALAN MICHAEL SELTZER
TERRANCE J. FITZPATRICK
JEFFREY A. FRANKLIN
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June 13, 1997

VIA HAND DELIVERY

James McNulty, Acting Prothonotary
Pennsylvania Public Utility Commission
North Office Building
P.O. Box 3265
Harrisburg, Pennsylvania 17102-2025

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

RECEIVED
97 JUN 13 PM 4:16
P.A.P.U.C.
PROTHONOTARY'S OFFICE

KJR

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations at 52 Pa. Code §5.342(d), is a Certificate of Service identifying Answers to Interrogatories that GPU Energy Company served today on the active participants in this proceeding.

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

Very truly yours,

David M. DeSalle
RYAN, RUSSELL, OGDEN & SELTZER LLP
800 North Third Street, Suite 101
Harrisburg, Pennsylvania 17102-2025
(717) 236-7714

Attorneys for
GPU Energy Company

DMD/cc
Attachment

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BEFORE THE
PUBLIC UTILITY COMMISSION

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PA.P.U.C.'S OFFICE
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PECO Energy Company :
Restructuring Plan Filing : Docket No. R-00973953
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the GPU Energy Company's Answers to PECO Energy Company's Interrogatory Set No. 1, Questions 1-12 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant).

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

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

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

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100 Pine Street
Harrisburg, PA 17108-1166
(Counsel for PAIEUG)

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Assistant Consumer Advocate
Office of Consumer Advocate
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Harrisburg, PA 17120

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

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Assistant Small Business Advocate
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Alan Kohler, Esquire
Wolf, Block, Schorr and Solis-Cohen
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(Counsel for Enron)

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(Counsel for CEPA, TAG, Action Alliance of Sr. Citizens & John Long, Jr.)

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Naval Facilities Engineering Command
Washington Navy Yard, Building 218, Room 200
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Washington, DC 20374-5018
(Counsel for Dept. Of Navy)

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600 N. Dairy Ashford, ML-1034
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(Counsel for New Energy Ventures)

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Harrisburg, PA 17112
(Attorney for Environmentalists)

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(Counsel for AARP)

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Greensburg, PA 15601-1689
(Counsel for Allegheny Power)

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Lillian Smith Harris, Esquire
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Harrisburg Energy Center
100 North Tenth Street - P.O. Box 1778
Harrisburg, PA 17105

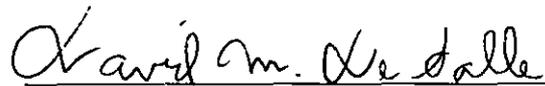
Usher Fogel, Esquire
Roland, Fogel, Koblenz & Carr LLP
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Albany, NY 12207
(Counsel for Pennsylvania Petroleum Assoc.)

Gary A. Jeffries, Senior Attorney
CNG Energy Services Company
One Park Ridge Center
P.O. Box 15746
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(Counsel for CNG)

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

Dated: June 13, 1997



David M. DeSalle
RYAN, RUSSELL, OGDEN & SELTZER LLP
800 North Third Street, Suite 101
Harrisburg, Pennsylvania 17120-2025
(717) 236-7714



PECO ENERGY

Legal Department

MEM

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 13, 1997

By Overnight Delivery

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

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

Dear Derrick:

Enclosed are PECO Energy Company's Answers to Philadelphia Area Industrial
Energy Users Group's Interrogatories:

Set VIII PAIEUG-VIII-2 and PAIEUG-VIII-9.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

00147

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PECO ENERGY

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

Paul R. Bonney
Ellen M. Cavanaugh
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Susan E. Sciamanna Foehl
Jenny P. Shulbank
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Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Legal Department

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

MEM

Direct Dial: 215 841 4252

June 13, 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-14, Navy-I-36, Navy-I-43, Navy-I-44, Navy-I-48, Navy-I-52, Navy-I-54, Navy-I-58, Navy-I-59, Navy-I-62 through Navy-I-66 and Navy-I-72.

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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Legal Department

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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 13, 1997

By Overnight Delivery

Kenneth L. Mickens, Senior Prosecutor
Office of Trial Staff
Pennsylvania Public Utility Commission
901 North 7th Street Rear
Harrisburg, PA 17120

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

Dear Ken:

Enclosed is PECO Energy Company's Answer to the Office of Trial Staff's
Interrogatory:

OTS-RB-33.

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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Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 13, 1997

By Overnight Delivery

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

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

Dear Alan:

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

Set II Environmentalists-II-92 through Environmentalists-II-101.

Set III Environmentalists-III-128 through Environmentalists-III-132,
Environmentalists-III-134 through Environmentalists-III-137, Environmentalists-
III-139 through Environmentalists-III-148, Environmentalists-III-152,
Environmentalists-III-153, Environmentalists-III-158 and Environmentalists-III-
162.

Sincerely,

Paul Bonney

PRB/mb

Enclosures

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

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Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 13, 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 IX: OCA-IX-7, OCA-IX-8 and OCA-IX-16.

Set X: OCA-X-4 and OCA-X-6. Set XI: OCA-XI-5

Set XV: OCA-XV-7, OCA-XV-13, OCA-XV-18, OCA-XV-27, OCA-XV-35 and
OCA-XV-49.

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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R-973953

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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 Interrogatory Set IX: OCA-IX-7, OCA-IX-8 and OCA-IX-16. Set X: OCA-X-4 and OCA-X-6. Set XI: OCA-XI-5 Set XV: OCA-XV-7, OCA-XV-13, OCA-XV-18, OCA-XV-27, OCA-XV-35 and OCA-XV-49.

- ✓ Department of the Navy's Interrogatories: Set I Navy-I-14, Navy-I-36, Navy-I-43, Navy-I-44, Navy-I-48, Navy-I-52, Navy-I-54, Navy-I-58, Navy-I-59, Navy-I-62 through Navy-I-66 and Navy-I-72..
- ✓ Philadelphia Area Industrial Energy Users Group's Interrogatories: Set VIII: PAIEUG-VIII-2 and PAIEUG-VIII-9.
- ✓ Environmentalists' Interrogatories: Set II Environmentalists-II-83 through Environmentalists-II-101. Set III Environmentalists-III-128 through Environmentalists-III-132, Environmentalists-III-134 through Environmentalists-III-137, Environmentalists-III-139 through Environmentalists-III-148, Environmentalists-III-152, Environmentalists-III-153, Environmentalists-III-158 and Environmentalists-III-162.
- ✓ Office of Trial Staff's Interrogatory: OTS-RB-33.

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

Tanya McCloskey, Esquire (FedEx)
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David Kleppinger, Esquire
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100 Pine Street
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(Counsel for PAIEUG)

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Suite 1102, Commerce Building
300 N. 2nd Street
Harrisburg, PA 17101

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

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1424 Chestnut Street
Philadelphia, PA 19102
(Counsel for CEPA, Action Alliance of Sr. Citizens & John Long, Jr.)

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Alan Kohler, Esquire
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(Counsel for PP&L)

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Pennsylvania Power & Light Company
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(Counsel for PP&L)

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(Counsel for AARP)

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214 State Street
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(Counsel for Delmarva Power & Light)

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Delmarva Power & Light Company
800 King Street
Wilmington, DE 19899
(Counsel for Delmarva Power & Light)

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1417 Blue Mountain Parkway
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(Counsel for Allegheny Power)

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901 - 15th Street, NW
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(Counsel for Allegheny Power)

Bruce A. Connell, Esquire
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Houston, TX 77079
(Counsel for DuPont Power Marketing, Inc.)

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 (Counsel for PPA)

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 Zeigler & Zimmerman, P.C.
 355 North 21st Street, Suite 304
 P.O. Box 1080
 Camp Hill, PA 17011-3707
 (Counsel for Delaware Valley)

Barbara Alexander
 Consumer Affairs Consultant
 15 Wedgewood Drive
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 35 Glenlake Parkway, Suite 475
 Atlanta, GA 30328

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 P.O. Box 15746
 Pittsburgh, PA 15244-0746

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 Yarmouth, Maine 04096

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 Larkin & Associates
 15728 Farmington Road
 Livonia, MI 48154

Paul Bonney/MB0

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

Dated: June 13, 1997



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Direct Dial: 215 841 4252

June 16, 1997

By Overnight Delivery

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

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

Dear Derrick:

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

Enron Set III - 9;
Enron Set IV - 1 and 2; and
Enron Set V - 3 thru 10.

Sincerely,

Paul Bonney
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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Sandra H. Byrne
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June 16, 1997

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Assistant General Counsel

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:

Navy Set I - 49, 51, and 160.

Sincerely,

Paul Bonney
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 16, 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

Dear Paul:

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

Allegheny - 15

Sincerely,

Paul Bonney
Paul Bonney

PRB/mbo

Enclosures

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

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PECO ENERGY

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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

June 16 1997

By Overnight Delivery

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

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

Dear Alan:

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

Environmentalists Set II - 85 thru 87 and 92; and
Environmentalists Set III - 138, 178 thru 190.

Sincerely,

Paul Bonney mtg
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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Noel H. Trask
Assistant General Counsel

Direct Dial: 215 841 4252

MEM

June 16, 1997

By Overnight Delivery

Kenneth L. Mickens, Senior Prosecutor
Office of Trial Staff
Pennsylvania Public Utility Commission
901 North 7th Street Rear
Harrisburg, PA 17120

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

Dear Ken:

Enclosed is PECO Energy Company's Answer to the Office of Trial Staff's
Interrogatory:

OTS-RS-18.

Sincerely,

Paul Bonney mtg
Paul Bonney

PRB/mbo

Enclosures

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

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PECO ENERGY

Legal Department

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Philadelphia, PA 19101-8699
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James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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Direct Dial: 215 841 4252

June 16, 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:

OCA Set IX - 1 and 11;
OCA Set X - 7, 8, 12, and 13;
OCA Set XI - 4, 12, 26; and
OCA Set XV - 12, 15, 55 thru 57 and 59.

Sincerely,

Paul Bonney
Paul Bonney

PRB/mbc
Enclosures

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

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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:

Allegheny's Interrogatory - 15;
Office of Consumer Advocate's Interrogatories: Set IX - 1 and 11; Set X - 7, 8, 12, and 13; Set XI - 4, 12, 26; and Set XV - 12, 15, 55 thru 57 and 59;
Department of the Navy's Interrogatories: Set 1 - 49, 51, and 160;
Enron's Interrogatories: Set III - 9; Set IV - 1 and 2; Set V - 3 thru 10;
Environmentalists' Interrogatories: Set II - 85 thru 87 and 92; Set III - 138, 178 thru 190;
Office of Trial Staff's Interrogatory: RS-18.

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

Tanya McCloskey, Esquire (FedEx)
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(Counsel for Enron)

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Washington, DC 20006-4759
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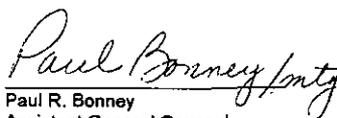
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GARY A. JEFFRIES
Senior Attorney

June 16, 1997

001220

Via Overnight Mail

KJR

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

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

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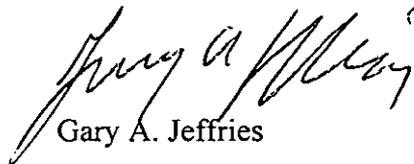
Dear Judge Chestnut and Judge Rainey:

CNG Energy Services Corporation ("CNG") was admitted as a party in this proceeding at the May 21, 1997 prehearing conference. Since that time, CNG has decided to discontinue its individual participation in this proceeding. Instead, CNG will pursue its interests in this matter through the Mid-Atlantic Power Supply Association ("MAPSA"), of which CNG is a member company. MAPSA is an existing party in this proceeding.

Accordingly, CNG hereby notifies you and all parties that CNG will not be filing its own individual testimony nor participating in any other individual capacity in this proceeding. CNG's involvement in the case will henceforth be entirely through MAPSA.

Notwithstanding the above, CNG does respectfully request to remain on the service list in this proceeding.

Respectfully submitted,


Gary A. Jeffries

cc: All Parties (First Class Mail)
James McNulty, Acting Prothonotary (First Class Mail)

DOCKETED

JUN 19 1997

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Certificate of Service

I hereby certify that I have served the foregoing document, dated June 16, 1997, by First Class Mail, upon the persons addressed below:

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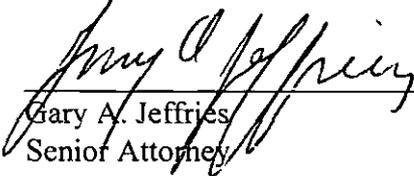
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Dated: June 16, 1997

[peco53]jeffries]

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GARY A. JEFFRIES
Senior Attorney

June 16, 1997

By Fax and First Class Mail

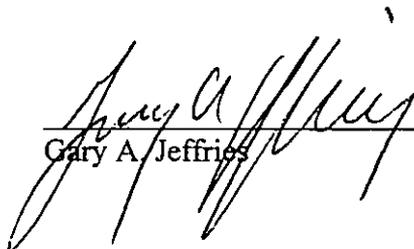
Paul R. Bonney, Esquire
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2301 Market Street
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Philadelphia, PA 19101-8699

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

Dear Paul:

Enclosed please find the responses of CNG Energy Services Corporation to PECO Energy Corporation's Interrogatories to CNG Energy Services Corporation, Set 1, numbered 1 through 12. CNG will not be calling an expert witness at the hearing in this matter. Accordingly, responses to the interrogatories are unnecessary.

Sincerely,



Gary A. Jeffries

Enclosures

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

c:\jeffries\peco_app

001221

KJR

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Certificate of Service

I hereby certify that I have served the foregoing document, dated June 16, 1997, by First Class Mail, upon the persons addressed below:

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001212

KJR

June 16, 1997

VIA HAND DELIVERY

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

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

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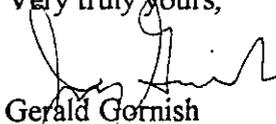
97 JUN 18 AM 10:56

Dear Ward:

Enclosed are Enron's Answers to PECO's Set I, Nos. 23-42. Since the attachments to Messrs. Reising's and Coles' testimony are extensive, copies of documents are only being included with the response being sent to PECO Energy, except for the resumes and list of proceedings, which are being included for all parties.

In addition, as I advised you, we do not contemplate presenting direct testimony of Richard Koda. Accordingly, we will not be responding to Interrogatory Nos. 13-22.

Very truly yours,



Gerald Gornish

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

GG/lak

Enclosures

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

DOCUMENT
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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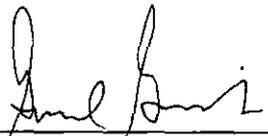
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Dated: June 16, 1997



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Assistant General Counsel

Direct Dial: 215 841 4252

June 17, 1997

By Fax and First Class Mail

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

To All Counsel:

Enclosed are two copies of PECO Energy Company's Interrogatories Regarding
Market Price Assumptions Set MP-I - 1-22.

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)

01744

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ENCLOSURE

(Counsel for IPL)

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

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

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Gary A. Jeffries, Senior Attorney
CNG Energy Services Corporation
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John P. Lavelle, Jr., Esquire
Hangley Aronchick Segal & Pudlin
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(Counsel for New Energy Ventures)

Paul L. Ziegler, Esquire
Ziegler & Zimmerman, PC
355 North 21st Street, Suite 304
P.O. Box 1080
Camp Hill, PA 17011-3707
(Counsel for Delaware Valley Schools)

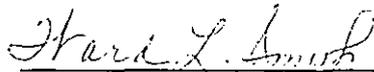
Janet Miller, Esquire
William T. Hawke, Esquire/Todd S. Stewart, Esq.
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100 N. Tenth Street
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Ward L. Smith
Assistant General Counsel
PECO Energy Company
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Philadelphia, PA 19103
(215) 841-4252
(215) 841-6863

Dated: June 17, 1997

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Bruce A. Connell
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600 N. Dairy Ashford, ML1034
P.O. Box 4783
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(281) 293-1736
Fax: (281) 293-3826

MEM

June 17, 1997

DOCUMENT
FOLDER

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

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

Dear Ward:

Enclosed are DuPont Power Marketing Inc.'s Answers to PECO's June 6, 1997,
Interrogatories, Set I, numbered 1 through 12. If you have any questions concerning these
responses, please contact me at your convenience.

Sincerely,

\cks

enc.

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

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PROTHONOTARY'S OFFICE

Certificate of Service

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

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

Tanya McCloskey, Esquire
Steven K. Steinmetz, Esquire
Assistant Consumer Advocate
Office of Consumer Advocate
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JUN 24 1997

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Assistant Small Business Advocate
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300 N. 2nd Street
Harrisburg, PA 17101

Christopher B. Craig, Esquire
Democratic Committee on Appropriations
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Penn Energy Project
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(Attorney for Environmentalists)

Roger Clark, Esquire
NESIP 905 Denston Drive
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Indianapolis Power & Light Company
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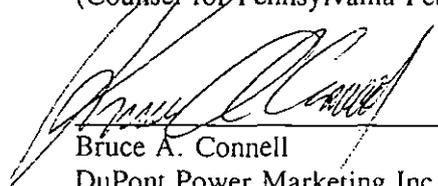
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Bruce A. Connell
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Legal Department
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PECO ENERGY

Legal Department

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215 841 5544
Fax 215 568 3389

001829

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MEM

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Senior Vice President
and General Counsel

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Legal Administrator

Paul R. Bonney
Ellen M. Cavanaugh
Edward J. Cullen, Jr.
Todd D. Cutter
Vilna Waldron Gaston
Gregory Golazeski
John C. Halderman
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Wendy Schermer
Susan E. Sciamanna Foehl
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Dawn Getty Sutphin
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Assistant General Counsel

By Overnight Delivery

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

June 17, 1997

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JUN 25 1997

DOCUMENT
FOLDER

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

Dear Alan:

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

Set I Environmentalists-I-3 and Environmentalists-I-4.

Set II Environmentalists-II-88, Environmentalists-II-89 and Environmentalists-II-102. through Environmentalists-II-104.

Set III Environmentalists-III-149, Environmentalists-III-160 and Environmentalists-III-163 through Environmentalists-III-169.

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo

Enclosures

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



PECO ENERGY

001828

Legal Department

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

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June 17, 1997

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

Paul R. Bonney
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Edward J. Cullen, Jr.
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Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

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

DOCUMENT
FOLDER

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

Dear Audrey:

Enclosed are PECO Energy Company's Answers to the Department of the
Navy's Interrogatories:

Set I Navy-I-27, Navy-I-29, Navy-I-31, Navy-I-32, Navy-I-33, Navy-I-39, Navy-I-
45, Navy-I-47, Navy-I-53, Navy-I-55, Navy-I-56 and Navy-I-67 through Navy-I-
71.

Sincerely,

Paul Bonney/mb

Paul Bonney

PRB/mb

Enclosures

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

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JUN 25 1997



PECO ENERGY

001827

Legal Department

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

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James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

June 17, 1997

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JUN 25 1997

By Overnight Delivery

Kenneth L. Mickens, Senior Prosecutor
Office of Trial Staff
Pennsylvania Public Utility Commission
901 North 7th Street Rear
Harrisburg, PA 17120

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

Dear Ken:

Enclosed are PECO Energy Company's Answers to the Office of Trial Staff's
Interrogatories:

OTS-RS-8 and OTS-RS-16.

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo

Enclosures

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

DOCUMENT
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PECO ENERGY

Legal Department

001826

PECO Energy Company
2301 Market Street
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215 841 5544
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PROTHONOTARY'S OFFICE

Direct Dial: 215 841 4252

June 17, 1997

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

Paul R. Bonney
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Susan E. Sciamanna Foehl
Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

By Overnight Delivery

DOCKETED

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

JUN 25 1997

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

Dear Tanya:

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

Set XI: OCA-XI-14 and OCA-XI-21.

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)

**DOCUMENT
FOLDER**



PECO ENERGY

001825

Legal Department

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Philadelphia, PA 19101-8699
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James W. Durham
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Legal Administrator

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Edward J. Cullen, Jr.
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Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

By Overnight Delivery

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

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

Dear Derrick:

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

Set II: Enron-II-12, Enron-II-13, Enron-II-16 and Enron-II-18 through Enron-II-21.

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo

Enclosures

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

June 17, 1997

DOCUMENT
FOLDER

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JUN 25 1997

Certificate of Service

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

Office of Consumer Advocate's Interrogatories: Set XI: OCA-XI-14 and OCA-XI-21

Department of the Navy's Interrogatories: Set I Navy-I-27, Navy-I-29, Navy-I-31, Navy-I-32, Navy-I-33, Navy-I-39, Navy-I-45, Navy-I-47, Navy-I-53, Navy-I-55, Navy-I-56 and Navy-I-67 through Navy-I-71.

Enron's Interrogatories: Set II: Enron-II-12, Enron-II-13, Enron-II-16 and Enron-II-18 through Enron-II-21.

Environmentalists' Interrogatories: Set I Environmentalists-I-3 and Environmentalists-I-4. Set II Environmentalists-II-88, Environmentalists-II-89 and Environmentalists-II-102. through Environmentalists-II-104. Set III Environmentalists-III-149, Environmentalists-III-160 and Environmentalists-III-163 through Environmentalists-III-169.

Office of Trial Staff's Interrogatories: OTS-RS-8 and OTS-RS-16.

Kenneth L. Mickens, Senior Prosecutor
Charles Shields, Prosecutor
Pennsylvania Public Utility Commission
Office of Trial Staff
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Barbara Alexander

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Consumer Affairs Consultant
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Richard Silkman
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Ralph Smith
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15728 Farmington Road
Livonia, MI 48154



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

Dated: June 17, 1997

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

June 18, 1997

DOUGLAS F. JOHN
EDWARD W. HENGERER
KEVIN M. SWEENEY
KIM M. CLARK
GORDON J. SMITH
SHELBY L. PROVENCHER

TELEPHONE
202/429-8809

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202/429-8805

Via Overnight Mail

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

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JUN 18 1997
PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

RE: Petition for Approval of Restructuring Plan (Docket No. R-00973953)

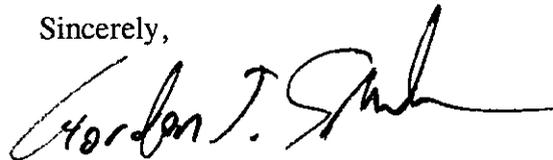
MEM

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 Duke Energy Trading and Marketing, L.L.C. 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
Duke Energy Trading and Marketing,
L.L.C.

DOCUMENT
FOLDER

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
DUKE ENERGY TRADING AND MARKETING, L.L.C.

This Petition for Leave to Intervene and Participate in the above-referenced proceeding is filed by Duke Energy Trading and Marketing, L.L.C. (DETM) 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. DETM 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
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John R. Orr, Esq.
DUKE ENERGY TRADING
AND MARKETING, L.L.C.
One Westchase Center, 10777 Westheimer
Suite 650
Houston, Texas 77042
Telephone: (713) 260-1800
Facsimile: (713) 260-6511

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PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

II.

DETM is a wholly-owned subsidiary of Duke Energy Natural Gas Corporation and is an independent power marketer. DETM — which received authorization from the Federal Energy Regulatory Commission on October 2, 1996 to sell electricity at market-based rates¹ —

¹ *PanEnergy Trading and Market Services, L.L.C.*, Docket No. ER96-2921-000, Letter Order dated October 2, 1996. DETM changed its name from PanEnergy Trading and Marketing Services, L.L.C., effective June 18, 1997.

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markets electric power and provides value-added services for utility and non-utility generators. DETM intends to serve customers on PECO Energy Company's (PECO) distribution system and has significant interest in the Pennsylvania electricity market in general.

III.

On January 24, 1997, the Commission issued an order directing PECO to file its restructuring plan. On April 1, 1997, PECO filed its restructuring plan.

IV.

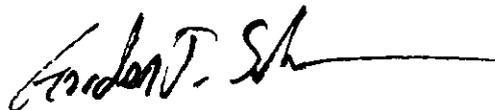
As a potential marketer of electricity to customers presently served in PECO's service territory, DETM will be directly and specifically affected by the outcome of this proceeding. DETM's interests in this proceeding cannot be adequately represented or protected by any other party hereto. Moreover, as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

At this early stage in the proceeding, DETM does not have any testimony. DETM 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, DETM requests that the Commission grant this Motion and that DETM be made a party to this proceeding for all purposes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gordon J. Smith", with a long horizontal line extending to the right.

Gordon J. Smith, Esq.
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036

Counsel for Duke Energy Trading and
Marketing, L.L.C.

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 18, 1997

VERNER · LIIPFER
BERNHARD · MCPHERSON & HAND
CHARTERED

ORIGINAL

Deborah A. Swanstrom
(202) 371-6197

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MEM

June 18, 1997

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VIA FEDERAL EXPRESS

JUN 18 1997

James J. McNulty
Acting Prothonotary
Pennsylvania Public Utility Commission
North Office Building
North Street and Commonwealth Avenue
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Dear Mr. McNulty:

Enclosed for filing in the above-captioned proceeding are an original and three copies of the Notice of Allegheny Power Regarding Its Intent Not To Present Direct Intervenor Testimony.

Also enclosed is an additional copy to be stamped and returned to us in the enclosed self-addressed envelope. Thank you for your assistance.

Very truly yours,



Deborah A. Swanstrom
Attorney for Allegheny Power

cc: The Honorable Marlane R. Chestnut (Via Federal Express)
The Honorable Charles E. Rainey, Jr. (Via Federal Express)
Service List (Via First Class Mail)

DOCUMENT
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION** JUN 18 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

**NOTICE OF ALLEGHENY POWER REGARDING ITS INTENT NOT TO
PRESENT DIRECT INTERVENOR TESTIMONY**

Allegheny Power has decided that it will not file Direct Intervenor Testimony in this proceeding. Allegheny Power hereby notifies the Presiding Judges and the parties of this intent.

Allegheny Power respectfully reserves the right to file Rebuttal Testimony, if necessary to respond to testimony filed by other parties, as well as to participate in the hearing and briefing process. Allegheny Power respectfully requests that the Presiding Judges and all parties to this proceeding continue to treat Allegheny Power as an active party and to serve all documents on Allegheny Power.

Respectfully submitted,

By: 

Clinton A. Vince
Paul E. Nordstrom
Deborah A. Swanstrom
Joel D. Newton
Verner, Lipfert, Bernhard, McPherson & Hand
901 15th Street, NW
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and

DOCKETED

JUN 25 1997

**DOCUMENT
FOLDER**

John L. Munsch
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800 Cabin Hill Drive
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Attorneys for Allegheny Power

Dated: June 18, 1997

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

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

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Dated this 18th day of June, 1997.

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