



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

000154

97 JUN -9 PM 9:46

Direct Dial: 215 841 4252

Sandra H. Byrne
Legal Administrator

RECEIVED
PROTHONOTARY'S OFFICE

June 6, 1997

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

By Fax and First Class Mail

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

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 Bruce:

Enclosed are two copies of PECO Energy Company's Interrogatories to DuPont,
Set I, numbered 1 through 12.

Sincerely,

Paul Bonney
Ward L. Smith

DOCKETED

JUN 16 1997

PRB/mtg

Enclosures

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



PECO ENERGY

Legal Department

000155

97 JUN -9 PM 9:46

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

James W. Durnam
Senior Vice President
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Direct Dial: 215 841 4252

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

By Fax and First Class Mail

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

DOCUMENT
FOLDER

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

Dear Chris:

Enclosed are two copies of PECO Energy Company's Interrogatories to CEPA
and Senator Vincent J. Fumo, Set II, numbered 1 through 22.

Sincerely,

Paul Bonney
Ward L. Smith

DOCKETED
JUN 16 1997

PRB/mtg

Enclosures

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



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

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

By Overnight Delivery

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

DOCUMENT-
FOLDER

Direct Dial: 215 841 4252

June 6, 1997

DOCKETED

JUN 12 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 IX OCA-IX-2, OCA-IX-6, OCA-IX-10, OCA-IX-13, OCA-IX-14 and OCA-IX-19 through OCA-IX-23.

Set XI OCA-XI-1 through OCA-XI-3, OCA-XI-6 through OCA-XI-9, OCA-XI-11, OCA-XI-14, OCA-XI-18, OCA-XI-19, OCA-XI-23. And OCA-XI-24.

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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PECO ENERGY

Legal Department

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

**DOCUMENT
FOLDER**

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

Direct Dial: 215 841 4252

June 6, 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 is PECO Energy Company's Answer to Allegheny Power's
Interrogatory:

Set I Allegheny-I-8.

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo

Enclosures

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

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PECO ENERGY

Legal Department

PECO Energy Company
2301 Market Street
PO Box 8699
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215 841 5544
Fax 215 568 3389

KJR

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

Direct Dial: 215 841 4252

June 6, 1997

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JUN 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 is PECO Energy Company's Answer to Enron's Interrogatory.

Set I Enron-I-39.

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo

Enclosures

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

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PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

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JUN 16 1997

Direct Dial: 215 841 4252

June 6, 1997

KJR

By Overnight Delivery

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

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

Dear Alan:

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

Set I Environmentalists-I-32.

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)

000734

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PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

Paul R. Bonney
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Edward J. Cullen, Jr.
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Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

DOCUMENT
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Direct Dial: 215 841 4252

June 6, 1997

By Overnight Delivery

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

DOCKETED
JUN 16 1997

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 Linda:

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

Set I AARP-I-3, AARP-I-4, AARP-26 through AARP-I-28, AARP-I-39 and
AARP-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)

1000733
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PROTHONOTARY'S OFFICE
97 JUN 11 AM 9:146

ROLAND, FOGEL, KOBLENZ & CARR, LLP

ATTORNEYS AT LAW

1 COLUMBIA PLACE

ALBANY, NEW YORK 12207

KEITH J. ROLAND
USHER FOGEL
MARK L. KOBLENZ
MURRAY S. CARR*
EMILIO A. F. PETROCCIONE

(518) 434-8112

(518) 462-4242

TELECOPIER (518) 434-3232

GEORGE A. ROLAND*
COUNSEL
*ALSO ADMITTED TO FLORIDA BAR

EDMUND A. KOBLENZ
1908-1972
A. ABBA KOBLENZ
1922-1979

MEM

June 6, 1997

000060

BY TELECOPIER (215) 568-3389
AND FIRST CLASS MAIL

Paul R. Bonney, Esq.
PECO Energy Company
Legal Department
2301 Market Street
P.O. 8699
Philadelphia, PA 19101-8699

DOCUMENT
FOLDER

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PROTHONOTARY'S OFFICE
97 JUN -9 AM 9:04

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

Dear Mr. Bonney:

Enclosed are two copies of the Pennsylvania Petroleum Association's Interrogatories and Document Requests to PECO Energy Company, Set A, numbered 1 - 4. A Certificate of Service is attached.

Very truly yours,

Usher Fogel
Usher Fogel

UF/mac
Enclosures

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

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission

v.

PECO Energy Company

(Application for Approval of a Restructuring Plan)

Docket No. R-00973953

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JUN 11 1997

000061

I hereby certify that I have this day served the foregoing document

"Interrogatories and Document Requests of the Pennsylvania Petroleum Association", by

first class mail, postage prepaid, upon the parties of record in this proceeding

Dated at Albany, New York, this 6th day of June, 1997.

RECEIVED
PROSECUTOR'S OFFICE
97 JUN 9 AM 9:04

Paul R. Bonney, Esq.
Assistant General Counsel
Noel H. Trask, Esq.
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699

Bernard A. Ryan, Esq.
Karen Oill Moury, Esq.
Small Business Advocate
Department of Commerce
Suite 1102 Commerce
300 N. 2nd Street
Harrisburg, PA 17101

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

DOCUMENT
FOLDER

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

Tanya McCloskey
Steven K. Steinmetz
Office of Consumer Advocate
14th Floor
1425 Strawberry Square
Harrisburg, PA 17120

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

Terence Fitzpatrick, Esq.
David DeSalle, Esq.
GPU Energy
Ryan, Russell, Ogden
& Seltzer
800 North Third Street
Suite 101
Harrisburg, PA 17102

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

Steven P. Hershey, Esq.
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102

Janet Miller, Esq.
MAPSA
Malatesta Hawke & McKeon
100 North Tenth Street
P.O.B. 1778
Harrisburg, PA 17105-1778

Roger Clark, Esq.
Environmentalists
905 Denston Drive
Ambler, PA 19002-3901

Christopher B. Craig, Esq.
Senator Vincent J. Fumo
Room 545 Main Capitol Building
Harrisburg, PA 17120

David A. Kaplan, Esq.
Pennsylvania Power & Light
Suite 500
1735 New York Avenue NW
Washington, D.C. 20006-4759

Walter W. Cohen, Esq.
Andrew J. Giorgione, Esq.
Indianapolis Power & Light Company
204 State Street
Harrisburg, PA 17101

Gerald Gornish, Esq.
Enron Corp.
Wolf, Block, Schorr &
Solis-Cohen
401 North Front Street
Harrisburg, PA 17101

David Boonin
New Energy Ventures
200 S. Broad Street
Suite 800
Philadelphia, PA 19107

Craig A. Doll, Esq.
Delmarva Power & Light Co.
214 State Street
Harrisburg, PA 17101

Linda C. Smith, Esq.
AARP
Dilworth, Paxson, Kalish
& Kauffman
305 N. Front Street
Suite 403
Harrisburg, PA 17101-1236

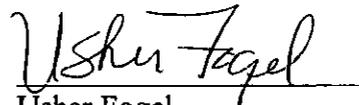
Bruce A. Connell, Esq.
DuPont Power Marketing, Inc.
600 N. Dairy Ashford ML-1034
Houston, TX 77079

Mr. Sam DeFrawi
Director, Navy Rate
Intervention
Washington Navy Yard
Building 212, Code 00R1
901 M Street, SE
Washington, D.C. 20374-5018

Gary A. Jeffries, Esq.
CNG Energy Services Corp.
One Park Ridge Center
P.O. Box 15746
Pittsburgh, PA 15244-0746

Joseph A. Malatesta, Jr., Esq.
Lillian Smith Harris, Esq.
Municipal Intervenors Group
Malatesta, Hawke & McKeon LLP
P.O. Box 1778
Harrisburg, PA 17105

Susan Shanaman, Esq.
Center for Energy &
Economic Development
212 North Third Street
Suite 203
Harrisburg, PA 17101-1505



Usher Fogel

*Counsel for Pennsylvania
Petroleum Association*

Roland, Fogel, Koblenz & Carr, LLP
1 Columbia Place
Albany, New York 12207
TEL: (518) 434-8112
FAX: (518) 434-3232

ORIGINAL



MEM

OFFICE OF SMALL BUSINESS ADVOCATE

Suite 1102, Commerce Building
300 North Second Street
Harrisburg, Pennsylvania 17101

Bernard A. Ryan, Jr.
Small Business Advocate

June 9, 1997

(717) 783-2525
(717) 783-2831(FAX)

HAND DELIVERED

Office of the Prothonotary
Pennsylvania Public Utility Commission
Room B-20, North Office Building
P. O. Box 3265
Harrisburg, PA 17105-3265

DOCUMENT
FOLDER

**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 for filing is the Office of Small Business Advocate's Motion to Compel PECO Energy Company to Provide a Response to Interrogatory OSBA-26 in the above-captioned case. As evidenced by the enclosed certificate of service, all parties have been served as indicated.

Sincerely,

Karen Oill Moury
Karen Oill Moury
Deputy Small Business Advocate

Enclosures

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

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JUN 10 1997

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
RESTRUCTURING PLAN UNDER :
SECTION 2806 OF THE :
PUBLIC UTILITY CODE :

Docket No. R-00973953

DOCUMENT FOLDER

**MOTION TO COMPEL PECO ENERGY COMPANY
TO PROVIDE A RESPONSE TO INTERROGATORY NO. 26 OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

To the Honorable Marlane R. Chestnut and Charles E. Rainey, Jr.:

By this Motion, filed pursuant to 52 Pa. Code §5.342(e), the Office of Small Business Advocate ("OSBA") respectfully requests that PECO Energy Company ("PECO") be compelled to provide a response to OSBA's Interrogatory No. 26. In support of this Motion, the OSBA avers as follows:

1. This proceeding involves PECO's request for approval of its Restructuring Plan that was submitted on April 1, 1997 in accordance with the Electricity Generation Competition and Customer Choice Act, 66 Pa.C.S. §§2801 et seq.

2. On May 28, 1997, the OSBA served Interrogatory No. 26 on PECO. On June 4, 1997, PECO filed an Objection to OSBA's Interrogatory No. 26. A copy of that Objection, which includes OSBA-26, is attached.

3. By Interrogatory No. 26, the OSBA requested that PECO conduct specific sensitivity analyses for each of the three market valuation models contained in its filing. According to the three

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OFFICE OF SMALL BUSINESS ADVOCATE

models, the projected market value of PECO's generating units ranges from \$2.863 billion to \$3.650 billion. See PECO Ex. TPH-3 through TPH-5. The models utilized to arrive at those market value estimates necessarily incorporate forecasts and assumptions regarding numerous factors such as demand levels, fuel costs, required reserve margins, load growth, transmission constraints and generating unit characteristics.

4. Sensitivity analyses, as a general matter, are helpful in identifying key variables or inputs which drive a model's results. Once this identification process is complete, it is possible to examine a model's results under alternate scenarios that encompass a reasonable range of values for key inputs.

5. In this particular case, sensitivity analyses will enable the Commission to form a high and low interval or bound around the Company's market value estimates. Those estimates can then be properly evaluated from the perspective of where they stand in relation to a range of likely market value measures.

6. OSBA-26 seeks to examine the effect on PECO's market value projections of changing underlying key assumptions relating to fuel price forecasts, load growth forecasts and planning reserve margins. The results of such sensitivity analyses would clearly provide valuable information for the Commission to consider when evaluating the reasonableness of PECO's market value estimates.

7. PECO's Objection to OSBA-26 characterizes the OSBA's requested variations to key assumptions as "arbitrary." (PECO Objection at paragraph 3). All three of the assumptions, however,

that OSBA seeks to vary for purposes of testing the sensitivity of the models' results involve key inputs which are based upon forecasts that PECO has either developed or relied upon in determining the market value of its generating units. The OSBA's requested changes are relatively small and would allow the parties and the Commission to learn how significant of an effect such changes would have upon the models' results. In addition, the OSBA seeks to gather the information for each model, assuming changes that are both above and below the data relied upon by PECO, in an effort to determine whether or not such changes have a symmetrical impact on PECO's market value projections.

8. PECO also claims in its Objection that compliance with the OSBA's request would be "extremely burdensome and would entail a significant expenditure of time and money." (PECO Objection at paragraph 3). In response to this concern expressed by PECO before filing its Objection, the OSBA advised PECO of our willingness to receive the requested information for only one of the three market valuation models. The OSBA continues to be willing to accept that compromise.

9. PECO next avers in its Objection that the OSBA can perform the requested investigation itself. (PECO Objection at paragraph 3). On the contrary, however, the OSBA does not have the models utilized by PECO or the resources necessary to run any sensitivity analyses on those models.

10. In an effort to support its Objection to OSBA-26, PECO refers to its response to OCA-X-12, which is attached to the

Objection as Appendix A. (PECO Objection at paragraph 4). According to that response, PECO will provide the results of its market price models, utilizing certain input assumptions which represent the best current estimates of an expert witness for the Office of Consumer Advocate. While the OSBA has no reason or basis at this time to challenge any of the specific input assumptions incorporated in OCA-X-12, we simply are not prepared to accept those estimates as representing a reasonable alternative case, without further sensitivity analyses and investigation. Therefore, the OSBA does not consider OCA-X-12 a satisfactory response to OSBA-26.

Therefore, based upon the foregoing, the Office of Small Business Advocate respectfully requests that PECO Energy be compelled to respond to OSBA-26 for at least one of the market valuation models contained in its filing.

Respectfully submitted,


Karen Oill Moury
Deputy Small Business Advocate

Dated: June 9, 1997

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APPLICATION OF PECO ENERGY	:	
COMPANY FOR APPROVAL OF ITS	:	
RESTRUCTURING PLAN UNDER	:	APPLICATION
SECTION 2806 OF THE	:	DOCKET NO. R-00973953
PUBLIC UTILITY CODE	:	

**PECO ENERGY COMPANY'S OBJECTIONS
TO THE OFFICE OF SMALL BUSINESS ADVOCATE'S INTERROGATORY
NUMBER 26**

Because we have been unable to reach agreement with you on how to answer the Office of Small Business Advocate's ("OSBA") Interrogatory Number 26, PECO Energy Company ("PECO" or the "Company"), pursuant to 66 Pa. C.S. § 333(d) and 52 Pa. Code §§ 5.342 and 5.361, hereby objects to that Interrogatory, and, in support of its objections, states as follows:

1. This proceeding involves PECO's request, pursuant to the recently enacted Electricity Generation Competition and Customer Choice Act (66 Pa. C.S. §§ 2801 et seq.) that the Pennsylvania Public Utility Commission issue an Order approving its restructuring plan. The nature of PECO's request is set forth in detail in its Application filed with the Commission on April 1, 1997.

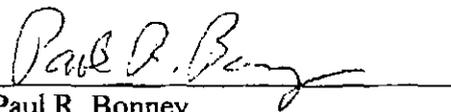
2. On May 28, 1997, the OSBA served on PECO Interrogatories numbers 23 through 26. A copy of Interrogatory Number 26 is attached as Appendix A to these Objections.

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JUD.
PROHONARY'S OFFICE

3. Interrogatory No. 26 asks, for each of the three projections of market value for PECO's generating units contained in PECO's Application, that additional market value modeling runs be conducted using various different assumptions and a combination of those assumptions. The OSBA provides no basis for the alternative assumptions it sets forth, nor does it sponsor the assumptions as its own or claim that the assumptions comprise, individually or collectively, a reasonable market value case. Thus, the requested assumptions represent arbitrary variations on the assumptions in the PECO studies. The requested data are, therefore, irrelevant to this proceeding and, in accordance with Section 333(d) of the Code (66 Pa.C.S. § 333(d)), are beyond the scope of permissible discovery. In addition, compliance with the OSBA's request would be extremely burdensome and would entail a significant expenditure of time and money as each of the three computer models utilized by PECO's consultants would have to be reprogrammed and rerun four different times. 52 Pa. Code § 5.361(a)(2). Finally, compiling the requested data would require PECO to make an unreasonable investigation that can be made by the OSBA itself. 52 Pa. Code § 5.361(a)(4).

4. By way of further answer, see also PECO's response to the Office of Consumer Advocate's Interrogatory No. OCA-X-12, which is attached as Appendix B.

Respectfully submitted,



Paul R. Bonney
Counsel for PECO Energy Company

Dated: June 4, 1997

Interrogatories of the
Office of Small Business Advocate
to PECO Energy Company - Docket No. R-973953

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26. For each of the three projections of market value for PECO's generating units contained in the Company's filing, please provide the alternate market value estimate that results in each of the following cases:
- a) the real annual growth rate in the price of coal, natural gas and oil is 1.0% above/below the corresponding fuel price forecast contained in the filed ("base case") study;
 - b) the annual rate of growth in load (peak demand and net energy) is 0.5% above/below the load growth forecast contained in the filed study;
 - c) planning reserve margins in the MAAC/PJM region are 2.0% above/below the "base case" reserve margins in all years; and
 - d) a composite model run combining all the "above-case" sensitivity changes in parts a) through c) in one sensitivity run ("High"), with the corresponding "below-case" sensitivities aggregated in a single run ("Low").

The results of the above scenarios should be provided in the same format as shown in PECO Exhibits TPH-3 through TPH-5.

Interrogatory OCA - X - 12

OCA - X - 12 Question:

In order to isolate methodological differences and minor input differences from differences in results due to major inputs, please use your market price model and methodology to estimate PJM market prices utilizing the following input assumptions:

- a. Fuel prices (Electric Generators, Middle Atlantic) presented in the EIA Annual Energy Outlook 1997 (escalated to nominal dollars by the EIA GDP deflator, as presented below);
- b. Adjustment of the EIA coal prices for higher sulphur content by a negative 15%.
- c. A capacity factor of 75% for nuclear units;
- d. Market capacity prices as follows: \$17/kW/year in 1997; \$30/kW-year in 1998; and \$43/kW-year in 1999. From 2000 forward, the 1999 price should be escalated at the EIA's forecast of the GDP Price Deflator, which is presented below.
- e. All other input assumptions should be the same as those previously utilized for your testimony and exhibits.

Year	EIA's GDP Price Deflator
1996	2.4%
1997	2.3%
1998	2.5%
1999	2.6%
2000	2.7%
2001	2.8%
2002	2.8%
2003	3.0%
2004	3.2%
2005	3.2%
2006	3.3%
2007	3.4%
2008	3.4%
2009	3.4%
2010	3.5%
2011	3.5%
2012	3.6%
2013	3.6%
2014	3.6%
2015	3.7%

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OCA-X-12 Answer:

Per discussions between Mr. John Bustard of PECO Energy and Mr. Doug Smith of La Capra Associates, PECO will proceed with using the three market price models utilizing the input assumptions described in this question. PECO's concern was the time and expense associated with the execution of the models being employed for a model test based on a hypothetical set of assumptions. Mr. Smith has assured PECO that the requested assumptions represent his best current estimates and represent a reasonable case from his viewpoint. PECO will proceed with the analysis.

PECO's best estimate for completion of this question is that two of the analyses can be completed by June 2, 1997 and the remaining analysis by June 6, 1997. Analyses will be provided as they become available.

Responsible Witness: J. F. Bustard

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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 a copy of the Motion to Compel PECO Energy Company to Provide a Response to Interrogatory No. 26 of the Office of Small Business Advocate by first class mail (unless otherwise indicated) upon the persons addressed below:

Hon. Marlane R. Chestnut
Administrative Law Judge
Pa. Public Utility Commission
1302 Phila. State Office Bldg.
Broad and Spring Garden Streets
Philadelphia, PA 19130
(FAX and first class mail)

Hon. Charles E. Rainey, Jr.
Administrative Law Judge
Pa. Public Utility Commission
1302 Phila. State Office Bldg.
Broad and Spring Garden Streets
Philadelphia, PA 19130
(FAX and first class mail)

Paul Bonney, Esquire
Ward Smith, Esquire
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 18101-8699
(FAX and first class mail)

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

Kenneth L. Mickens, Esquire
Charles Daniel Shields, Esq.
Office of Trial Staff
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17101

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

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

Christopher B. Craig, Esquire
Counsel to Senator Fumo
Room 545, Main Capitol Bldg.
Harrisburg, PA 17120

Walter W. Cohen, Esquire
Obermayer Rebmman Maxwell &
Hippel LLP
204 State Street
Harrisburg, PA 17101

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

John L. Munsch, Esquire
West Penn Power Company
800 Cabin Hill Drive
Greensburg, PA 15601

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

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PHOTOGRAPHY OFFICE

William T. Hawke, Esquire
Janet L. Miller, Esquire
Todd S. Stewart, Esquire
Malatesta, Hawke & McKeon
100 North Tenth Street
P. O. Box 1778
Harrisburg, PA 17105

Clinton A. Vince, Esquire
Paul E. Nordstrom, Esquire
Deborah A. Swanstrom, Esquire
Joel D. Newton, Esquire
Verner, Liipfert, Bernhard,
McPherson & Hand
901 15th Street, N.W.
Washington, DC 20005-2301

Donald A. Kaplan, Esquire
Preston Gates Ellis &
Rouvelas Meeds
Suite 500
1735 New York Avenue, N.W.
Washington, DC 20006-4759

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

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

Terence Fitzpatrick, Esquire
David Desalle, Esquire
Ryan, Russell, Ogden & Seltzer
800 North Third Street
Suite 101
Harrisburg, PA 17102-2025

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

Mr. Richard LaCapra
LaCapra Associates
The Providence Building
333 Washington Street
Boston, MA 02108

Paul Russell, Esquire
Pennsylvania Power & Light Co.
Two North Ninth Street
Allentown, PA 18101-1179

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

Michael G. Banta, Esquire
Vice-President and Assistant
General Counsel
Indianapolis Power & Light Co.
One Monument Circle
P.O. Box 1595
Indianapolis IN 46206-1595

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

Mr. David Boonin
New Energy Ventures
200 S. Broad Street, Suite 800
Philadelphia, PA 19102

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

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

Audrey Van Dyke, Esquire
Naval Facilities Engineering
Command - Litigation
Headquarters 09L
Washington Navy Yard Bldg. 218
901 M Street SE
Washington, DC 20374-5018

Michael L. Kessler, Esquire
Vice President/General Counsel
American Energy Solutions, Inc.
111 South Alfred Street
Alexandria, VA 22314

Joseph J. Malatesta, Jr., Esq.
Malatesta, Hawke & McKeon
100 North Tenth Street
P. O. Box 1778
Harrisburg, PA 17105

Usher Fogel, Esquire
Roland, Fogel, Koblenz
& Carr, LLP
1 Columbia Place
Albany, NY 12207

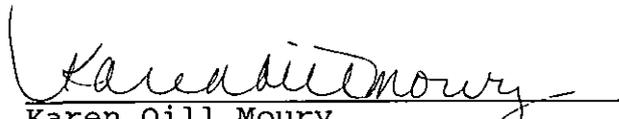
Susan M. Shanaman, Esquire
212 North Third Street
Suite 203
Harrisburg, PA 17101-1505

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

Mr. Richard Silkman
163 Main Street
Yarmouth, Maine 04096

Joseph A. Dworetzky, Esquire
Hangley Aronchick Segal
& Pudlin
One Logan Square
Twelfth Floor
Philadelphia, PA 19103-6933

Paul L. Zeigler, Esquire
Zeigler & Zimmerman, P.C.
355 N. 21st Street, Suite 304
P. O. Box 1080
Camp Hill, PA 17011-3707


Karen Oill Moury
Deputy Small Business Advocate

Date: June 9, 1997



PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

Paul R. Bonney
Ellen M. Cavanaugh
Edward J. Cullen, Jr.
Todd D. Cutler
Vilna Waldron Gaston
Gregory Golazeski
John C. Halderman
Mary McFall Hopper
Stephen L. Huntoon
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Roslyn G. Pollack
Christine A. Reutner
Wendy Schermer
Susan E. Sciamanna Foehl
Jenny P. Shulbank
Ward L. Smith
Dawn Getty Sutphin
Noel H. Trask
Assistant General Counsel

By Overnight Delivery

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

DOCUMENT
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MEM

Direct Dial: 215 841 4252

June 9, 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-16 and OCA-XI-17.

Set XIII OCA-XIII-2, OCA-XIII-11 and OCA-XIII-12.

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)

000948

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PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

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Direct Dial: 215 841 4252

June 9, 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 is PECO Energy Company's Answer to Allegheny Power's
Interrogatory:

Set I Allegheny-I-12.

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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PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

Direct Dial: 215 841 4252

June 9, 1997

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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

009950

Dear Alan:

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

Set I Environmentalists-I-13 and Environmentalists-I-27.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

cc: w/enclosures
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PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

Paul R. Bonney
Ellen M. Cavanaugh
Edward J. Cullen, Jr.
Todd D. Cutler
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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 9, 1997

By Overnight Delivery

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

DOCUMENT
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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 Derrick:

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

Set VIII PAIEUG-VIII-1 and PAIEUG-VIII-8.

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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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 XI OCA-XI-16 and OCA-XI-17. Set XIII OCA-XIII-2, OCA-XIII-11 and OCA-XIII-12.

Allegheny Power's Interrogatory: Set I Allegheny-I-12.

Environmentalists' Interrogatory: Set I: Environmentalists-I-13 and Environmentalists-I-27.

Philadelphia Area Industrial Energy Users Group's Interrogatories: Set VIII PAIEUG-VIII-1 and PAIEUG-VIII-8.

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

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

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

DOCUMENT
FOLDER

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Walter W. Cohen, Esquire
Andrew J. Giorgione, Esquire
Obermayer Rebmann Maxwell & Hippel LLP
204 State Street
Harrisburg, PA 17101
(Counsel for IPL)
87927

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

000951

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

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

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

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

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

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

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

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

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

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

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

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

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

Gary A. Jeffries, Senior Attorney
CNG Energy Services Corporation
One Park Ridge Center
P.O. Box 15746
Pittsburgh, PA 15244-0746

Richard Silkman
163 Main Street
Yarmouth, Maine 04096

Ralph Smith
Larkin & Associates
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 9, 1997



PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

Direct Dial: 215 841 4252

MEM

0007159
June 9, 1997

DOCUMENT FOLDER

By Fax and First Class Mail

Paul D. Zeigler, Esq.
Zeigler & Zimmerman, P.C.
355 N. 21st Street, Suite 304
P.O. Box 1080
Camp Hill, PA 17011-3707

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

RECEIVED
PROTHONOTARY'S OFFICE
JUN 11 AM 9:30

Dear Mr. Zeigler:

As discussed today, enclosed are two copies of PECO Energy Company's Interrogatories to Delaware Valley Schools, Set I, numbered 1 through 42. As you requested, also enclosed is a copy of the Administrative Law Judge's Prehearing Order # 1.

Sincerely,

Paul Bonney
Ward L. Smith

PRB/mtg

Enclosures

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

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.

Paul D. Zeigler, Esq.
Zeigler & Zimmerman, P.C.
355 N. 21st Street, Suite 304
P.O. Box 1080
Camp Hill, PA 17011-3707
(Counsel for Delaware Valley Schools
Energy/Utility Consortium)

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JUN 12 1997

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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 9, 1997

ORIGINAL

CRAIG A. DOLL

ATTORNEY AT LAW

214 STATE STREET

HARRISBURG, PENNSYLVANIA 17101

000547

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PROTHONOTARY'S OFFICE
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June 10, 1997

James J. McNulty, Esquire
Prothonotary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

DOCUMENT
FOLDER

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

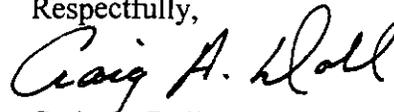
Dear Mr. McNulty:

Pursuant to the Commission's Regulations at 52 Pa. Code §5.342(d), attached is a Certificate of Service identifying the answers to interrogatories that Delmarva Power & Light Company served today on the active parties in this proceeding.

Please time stamp the enclosed copy and return it in the enclosed envelope. Thank you for your cooperation.

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

Respectfully,


Craig A. Doll

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:

PECO Energy Company's Interrogatories: Set I - DPL-I-1 through DPL-I-12

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

Derrick Williamson, Esquire
David Kleppinger, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17120
(Counsel for PAIEUG)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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FOLDER

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PROTHONOTARY'S OFFICE

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

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

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

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

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

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

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

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

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

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

Susan M. Shanaman, Esquire
212 North Third Street, Suite 203
Harrisburg, PA 17101

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

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

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

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

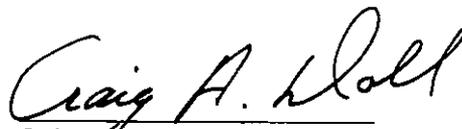
Stephen J. Baron
J. Kennedy and Associates
35 Glenlake Parkway, Suite 475
Atlanta, GA 30328

Gary A. Jeffries, Senior Attorney
CNG Energy Services Corporation
One Park Ridge Center
P.O. Box 15746
Pittsburgh, PA 15244-0746

Richard Silkman
163 Main Street
Yarmouth, Maine 04096

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

Dated: June 10, 1997



Craig A. Doll, Esquire
214 State Street
Harrisburg, PA 17101
(717) 230-9555

Attorney for Delmarva Power & Light Company

DOCUMENT
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KJR

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

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PROTHONOTARY'S OFFICE

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

June 10, 1997

TELEPHONE
202/429-8800

TELECOPIER
202/429-8805

DOCKETED
JUN 16 1997

Via Overnight

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

Re: *PECO Power's Restructuring Plan*, Docket No. R-00973953

Dear Sir or Madam:

Please add my name as an interested party to the service list in Docket No. R-00973953, *PECO Power's Restructuring Plan*. Thank you for your cooperation.

Joelle Ogg
John & Hengerer
1200 17th Street, NW
Suite 600
Washington, D.C. 20036

(202) 429-8812 (phone)
(202) 429-8805 (fax)

If you have any questions, please do not hesitate to call me at (202) 429-8812.

Sincerely,


Joelle Ogg



PECO ENERGY

Legal Department

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

KJR

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

Direct Dial: 215 841 4252

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JUN 16 1997

June 10, 1997

By Overnight Delivery

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

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

Dear Alan:

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

Set II Environmentalists-II-113.

**DOCUMENT
FOLDER**

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

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

Direct Dial: 215 841 4252

June 10, 1997

By Overnight Delivery

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

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

Dear Tanya:

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

Set VI: OCA-VI-13.

Set IX OCA-IX-9, OCA-IX-15 and OCA-IX-17.

Set XI OCA-XI-13, OCA-XI-15, OCA-XI-20 and OCA-XI-22.

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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PECO ENERGY

Legal Department

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

James W. Durham
Senior Vice President
and General Counsel

Sandra H. Byrne
Legal Administrator

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

Direct Dial: 215 841 4252

June 10, 1997

DOCKETED

JUN 16 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 VI PAIEUG-VI-1 through PAIEUG-VI-4.

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo

Enclosures

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

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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 VI: OCA-VI-13. Set IX OCA-IX-9, OCA-IX-15 and OCA-IX-17. Set XI OCA-XI-13, OCA-XI-15, OCA-XI-20 and OCA-XI-22.

Environmentalists' Interrogatory: Set II Environmentalists-II-113.

Philadelphia Area Industrial Energy Users Group's Interrogatories: Set VI PAIEUG-VI-1 through PAIEUG-VI-4.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Walter W. Cohen, Esquire
Andrew J. Giorgione, Esquire
Obermayer Rebmann Maxwell & Hippel LLP
204 State Street
Harrisburg, PA 17101
(Counsel for IPL)
87927

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Gary A. Jeffries, Senior Attorney
CNG Energy Services Corporation
One Park Ridge Center
P.O. Box 15746
Pittsburgh, PA 15244-0746

Richard Silkman
163 Main Street
Yarmouth, Maine 04096

Ralph Smith
Larkin & Associates
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 10, 1997