

DATE: May 22, 1997

SUBJECT: R-00973953

TO: Office of Administrative Law Judge

FROM: *WJB* John G. Alford, Secretary

KJR

PECO ENERGY COMPANY RESTRUCTURING PLAN

Attached is copy of a Petition to Intervene and Prehearing Memorandum of New Energy Ventures filed in connection with the above docketed proceeding.

This matter is assigned to your Office for appropriate action.

Attachment

cc: OTS

wjz

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MAY 23 1997

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PECO ENERGY

000670

Legal Department

PECO Energy Company
2301 Market Street
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Fax 215 568 3389

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May 22, 1997

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and General Counsel

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Legal Administrator

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Noel H. Trask
Assistant General Counsel

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

Set II OCA-II-7.

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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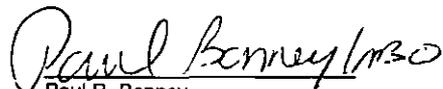
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Dated: May 22, 1997



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Sincerely,

Paul Bonney / mbo

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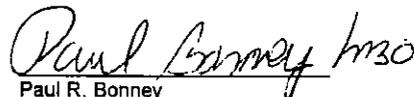
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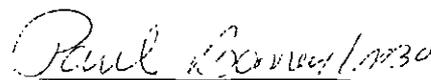
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Re: Application of PECO Energy Company for Approval of its Restructuring
Plan under Section 2806 of the Public Utility Code
Docket No. R-00973953

Dear Michael:

Enclosed are PECO Energy Company's Answers to Indianapolis Power & Light
Company's Interrogatories:

Set I IPL-I-3 and IPL-I-4.

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

Sincerely,

Paul Bonney

PRB/mbo
Enclosures

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

Certificate of Service

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

Enron's Interrogatories: **Set I** Enron-I-1.

Office of Consumer Advocate's Interrogatory: **Set II** OCA-II-7.

Indianapolis Power & Light Company's Interrogatories: **Set I** IPL-I-3 and IPL-I-4.

Environmentalists' Interrogatories: **Set** Environmentalists-I-18, Environmentalists-I-19, Environmentalists-I-20 and Environmentalists-I-22.

Office of Small Business Advocate's Interrogatories: **Set I** OSBA-I-17 and OSBA-I-22.

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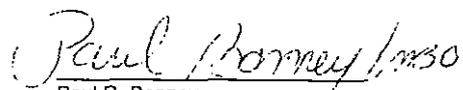
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Dated: May 22, 1997



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

Dear Tanya:

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

Set X OCA-X-2.

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

Sincerely,

Paul Bonney

PRB/mbo
Enclosures

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

Certificate of Service

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

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Allegheny Power's Interrogatories: **Set I** Allegheny-I-4 through Allegheny-I-7 and Allegheny-I-9.

Office of Trial Staff's Interrogatory: OTS-RB-30

Office of Small Business Advocate's Interrogatories: **Set I** OSBA-I-4, OSBA-I-5, OSBA-I-6 and OSBA-I-13.

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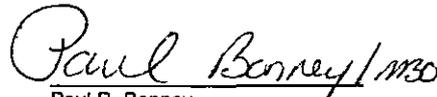
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Re: Application of PECO Energy Company for Approval of its Restructuring
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Docket No. R-00973953

Dear Karen:

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

Set I OSBA-I-4, OSBA-I-5, OSBA-I-6 and OSBA-I-13.

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

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo
Enclosures

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

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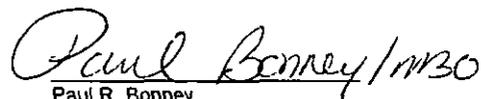
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Dated: May 23, 1997



PECO ENERGY

000422

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By Overnight Delivery

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

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

OTS-RB-30.

Sincerely,

Paul Bonney

PRB/mbo

Enclosures

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

Certificate of Service

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

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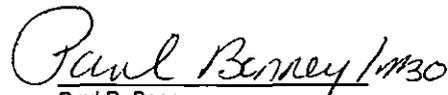
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Dated: May 23, 1997



PECO ENERGY

000424

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

Dear Derrick:

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

Set I Enron-I-32 through Enron-I-38, Enron-I-47 through Enron-I-49 and Enron-I-51 and Enron-I-52.

Sincerely,

Paul Bonney

PRB/mb0

Enclosures

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James McNulty, Acting Prothonotary (Certificate of Service Only)

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Dated: May 23, 1997



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May 23, 1997

KJR

James McNulty
Acting Prothonotary
Pennsylvania Public Utility Commission
P.O. Box 3265, North Office Building
Harrisburg, PA 17105-3265

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:

The purpose of this letter is to inform the Commission that PECO Energy Company has agreed to the Office of Consumer Advocate's request for a voluntary extension of the date for Commission consideration of this matter from December 31, 1997 to January 8, 1998. This extension was discussed at the May 21st Prehearing Conference and no party objected.

Please call me if you have any questions.

Sincerely,

Paul Bonney

PRB/mbo

cc: Honorable John M. Quain
Honorable John Hanger
Honorable David W. Rolka
Honorable Robert K. Bloom
Honorable Nora Mead Brownell
Honorable Marlane R. Chestnut
Honorable Charles E. Rainey, Jr
John G. Alford, Secretary
Otto Hofmann, Deputy Executive Director
Certificate of Service

INDEXED

MAY 28 1997

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

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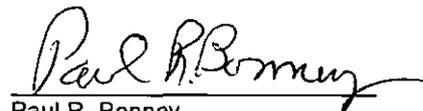
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Dated: May 23, 1997



PECO ENERGY

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KJR

James McNulty
Acting Prothonotary
Pennsylvania Public Utility Commission
P.O. Box 3265, North Office Building
Harrisburg, PA 17105-3265

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Under Section 2806 Of The Public Utility Code,
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PRB/mb

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Administrative Law Judge
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130

Honorable Charles E. Rainey, Jr.
Administrative Law Judge
1302 Philadelphia State Office Building
1400 West Spring Garden Street
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Kenneth L. Mickens, Esquire
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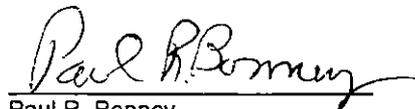
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Dated: May 23, 1997

ROLAND, FOGEL, KOBLENZ & CARR, LLP

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000394

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

May 23, 1997

**BY TELECOPIER (717) 783-9526
AND FIRST CLASS MAIL**

Mr. James J. McNulty
Deputy Prothonotary
Office of Prothonotary - Room B-20
Pennsylvania Public Utility Commission
P.O. Box 3265
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ORIGINAL

RECEIVED
PROTHONOTARY'S OFFICE
97 MAY 27 AM 10:05
KJR

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

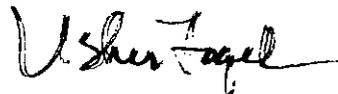
Dear Mr. McNulty:

Enclosed please find an original and nine (9) copies of the "Petition to Intervene" filed on behalf of the Pennsylvania Petroleum Association in the above-captioned matter.

A copy of this filing has been served upon all active parties.

Please date stamp our "file copy" and return in the enclosed self-addressed envelope.

Very truly yours,



Usher Fogel

UF/mac
Enclosures

cc: Active Parties to Docket No. R-00973953 (by first class mail)
Hon. Marlane R. Chestnut (by first class mail)
Hon. Charles E. Rainey, Jr. (by first class mail)
John Zinkand (by first class mail)

17

ORIGINAL

Commonwealth of Pennsylvania

PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

PECO ENERGY COMPANY

JUN 02 1997

0003

Docket No. R-973953

Application for Approval of Restructuring Plan

ORIGINAL

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PETITION TO INTERVENE OF THE
PENNSYLVANIA PETROLEUM ASSOCIATION

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Pursuant to the Rules and Practice of Procedure of the Pennsylvania Public Utility Commission (Commission), 52 Pa. Code §5.71, et. seq., the Pennsylvania Petroleum Association (PPA), through its attorneys, hereby petitions to intervene as a party in the captioned docket. In support thereof, PPA respectfully shows as follows:

1. The names and addresses of the individuals to whom notices, pleadings and other communications in this docket should be directed are as follows:

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

John P. Zinkand
Executive Vice President
Pennsylvania Petroleum Association
Suite 121, Building 2
2001 N. Front Street
Harrisburg, PA 17102
TEL: (717) 233-5838
FAX: (717) 233-4578

2. PPA is a statewide trade association representing independent energy

marketers located throughout the Commonwealth and in the service territory of the PECO Energy Company (PECO or Company). The members of PPA are engaged in the distribution, marketing and sale on an independent basis of petroleum, natural gas, propane and related equipment which use these energy sources, and intend to actively participate in the independent sale of electricity and related services once retail access is authorized within the service territory of PECO and other public utilities in the Commonwealth of Pennsylvania. The members of PPA represent an important segment of the economic infrastructure of the Commonwealth and have actively participated and intervened in energy related proceedings affecting the provision of energy products and services.

3. PPA and its members have a significant interest in maintaining a vibrant, healthy and effective competitive market for the provision of all energy products and services. The introduction of competition accompanied by an even playing field between all energy producers, marketers and businesses will ensure that consumers are provided with an array of competitive choices, and that the need of consumers and businesses for electric power will be met in the most economically efficient manner.

4. On or about April 1, 1997, an Application for Approval of Restructuring Plan was submitted on behalf of the Company seeking approval of the Company's proposal to restructure its corporate organization, separate its generation, transmission and distribution functions, unbundle electric rates, and implement retail access for electric consumers. The restructuring plan, if approved, will affect how, in

what manner and at what cost electric utility service is provided to residential, commercial and industrial customers, thereby undergirding the utility's competitive standing as well as the ability of independent marketers, such as the members of PPA to compete on effective and equitable terms. Hence, the plan will affect the emerging competitive market with respect to the distribution of electricity and will thus directly impact upon the interests of the members of PPA.

5. Additionally, when operating their businesses, the members of PPA rely significantly upon electricity, which is currently provided by the Company. As the proposed restructuring will substantially impact upon the cost and the manner by which such electric service is provided, the economic viability of the businesses of our members is directly impacted by the ultimate outcome of this proceeding.

6. The movant's interest as a consumer, customer and competitor will be directly affected by the outcome of this proceeding, and petitioner will be bound by the action of the Commission in this proceeding.

7. PPA clearly has an interest which may be substantially and directly affected by the Commission's action in this proceeding. In order to protect such interest, PPA requests permission to participate fully as a party in all aspects of this proceeding. Due to its unique interests and concerns, no other party can adequately represent the interests of PPA and its members.

8. The outcome of this proceeding will fundamentally alter the electric distribution market in the Commonwealth, allowing for the transition from a regulated

monopoly structure to a competitive environment. In this transitional process, it is imperative that independent marketers and users of electricity be allowed to participate in regulatory proceedings which will determine the contours and structure of the new competitive environment. PPA will be instrumental in determining the success of and be impacted by the move to a competitive environment. Consequently, the participation by PPA in this proceeding will be in the public interest.

9. The undersigned counsel, also moves that he be permitted to appear in this proceeding, pro hac vice, on behalf of PPA. Mr. Fogel has been a member in good standing of the bar of the State of New York since 1977, and there are, to his knowledge, no disciplinary proceedings pending against him in any jurisdiction. He has advised PPA concerning the issues raised in the instant application and has special knowledge and expertise regarding such matters.

WHEREFORE, the Pennsylvania Petroleum Association requests that the Commission grant its petition to intervene as a party in this proceeding, and grant the motion to appear pro hac vice.

Respectfully submitted,

Pennsylvania Petroleum Association

By: Usher Fogel
Usher Fogel, Esq.
Roland, Fogel, Koblenz & Carr, LLP
1 Columbia Place
Albany, New York 12207
(518) 434-8112

Dated: May 23, 1997
Albany, New York

Certificate of Service

I, Mary Anne Clark, do hereby certify that I have this day served the foregoing document upon each person designed on the official service list compiled in this proceeding.

Dated at Albany, New York, this 23rd day of May, 1997.


Mary Anne Clark
Mary Anne Clark

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1 Columbia Place
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PECO ENERGY
000318

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97 JUN -2 AM 8:40

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May 23, 1997

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By Overnight Delivery

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

Dear Karen:

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

Set I OSBA-I-9.

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

Sincerely,

Paul Bonney/mbo

Paul Bonney

DOCUMENT
FOLDER

PRB/mbo
Enclosures

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

Certificate of Service

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

Office of Consumer Advocate's Interrogatory: Set X OCA-X-1 and OCA-X-3, Set XIII OCA-XIII-5.

Philadelphia Area Industrial Energy Users Group's Interrogatory: Set VI PAIEUG-VI-9.

Office of Small Business Advocate's Interrogatory: Set I OSBA-I-9.

Allegheny Power's Interrogatories: Set I Allegheny-I-2, Allegheny-I-3, Allegheny-I-10 and Allegheny-I-11.

Enron's Interrogatories: Set II Enron-II-4 through Enron-II-6.

Environmentalists' Interrogatories: Set I Environmentalists-I-5, Environmentalists-I-8 through Environmentalists-I-12, Environmentalists-I-25, Environmentalists-I-26, Environmentalists-I-28, Environmentalists-I-31 and Environmentalists-I-33.

American Association of Retired Persons' Interrogatories: Set I AARP-I-34 through AARP-I-38 and AARP-I-42 through AARP-I-44.

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May 27, 1997

KJR

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PECO Energy Company
2301 Market Street
Philadelphia, PA 19103

VIA FEDERAL EXPRESS

00960

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

Dear Mr. Bonney:

Please find enclosed two (2) copies of the Philadelphia Area Industrial Energy Users Group's Interrogatories, Set VIII, to PECO Energy Company in the above-referenced proceeding.

Responses to these interrogatories are due within ten (10) days of service. Please endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly. Please send one (1) copy of your responses and all attachments to the undersigned. In addition, please provide one (1) copy of your responses and all attachments to:

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

DOCUMENT
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Paul R. Bonney, Esq.
May 27, 1997
Page 2

Please communicate any objections or questions that you may have to these interrogatories as quickly as possible.

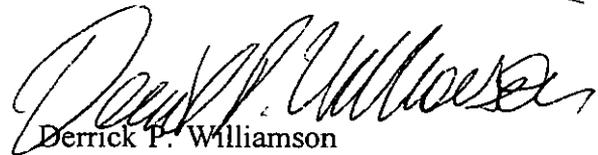
Copies of these interrogatories are being served on all parties consistent with the attached Certificate of Service.

Thank you for your attention to this matter.

Very truly yours,

McNEES, WALLACE & NURICK

By



Derrick P. Williamson

Counsel to the Philadelphia Area
Industrial Energy Users Group

DPW/ah
Enclosures

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

CERTIFICATE OF SERVICE

000561

97 MAY 28 AM 10:48

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PROSECUTOR'S OFFICE

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

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CERTIFICATE OF SERVICE

Page 2

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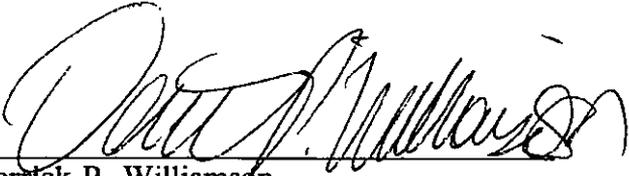
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Mr. Peter Bradford
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Derrick P. Williamson

Dated this 27th day of May, 1997, in Harrisburg, Pennsylvania.



PECO ENERGY

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May 27, 1997

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KJR

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

Dear Tanya:

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

Set IX OCA-IX-12 and OCA-IX-13.

Set X OCA-X-12 and OCA-X-18.

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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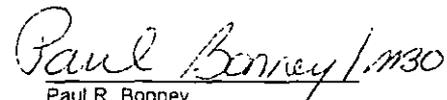
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Dated: May 27, 1997

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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-12 and OCA-IX-13, Set X OCA-X-12 and OCA-X-18.

Office of Trial Staff's Interrogatory: OTS-RE-10

Indianapolis Power & Light Company's Interrogatories: Set I IPL-I-1 and IPL-I-2.

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DOCKETED
JUN 02 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

KJR

Dear Ken:

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

OTS-RE-10.

Sincerely,

Paul Bonney/mbo

Paul Bonney

DOCUMENT
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PRB/mbo

Enclosures

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

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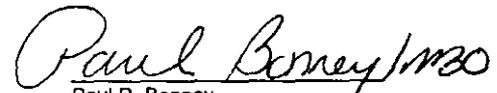
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Dated: May 27, 1997



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KJR

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

Dear Michael:

Enclosed are PECO Energy Company's Answers to Indianapolis Power & Light
Company's Interrogatories:

Set I IPL-I-1 and IPL-I-2.

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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Dated: May 27, 1997



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Assistant General Counsel

May 29, 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 I Environmentalists-I-5, Environmentalists-I-8 through Environmentalists-I-12, Environmentalists-I-25, Environmentalists-I-26, Environmentalists-I-28, Environmentalists-I-31 and Environmentalists-I-33.

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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Office of Small Business Advocate's Interrogatory: Set I OSBA-I-9.

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Dated: May 29, 1997



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May 29, 1997

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By Overnight Delivery

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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-4 through Enron-II-6.

Sincerely,

Paul Bonney

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PRB/mbo

Enclosures

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

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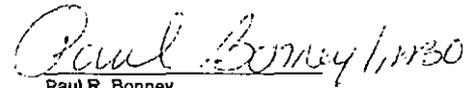
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Dated: May 29, 1997



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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-2, Allegheny-I-3, Allegheny-I-10 and Allegheny-I-11.

Sincerely,

Paul Bonney/mso

Paul Bonney

PRB/mbo

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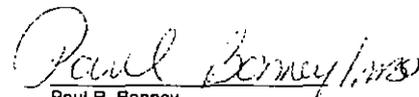
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If you have any questions, please call me at (215) 841-4252.

Sincerely,

Paul Bonney

PRB/mbo
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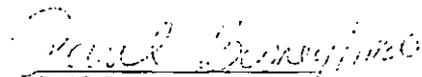
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Dated: May 29, 1997



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May 29, 1997

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By Overnight Delivery

Linda C. Smith, Esquire
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305 North Front Street, Suite 403
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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 Linda:

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

Set I AARP-I-34 through AARP-I-38 and AARP-I-42 through AARP-I-44.

Sincerely,

Paul Bonnev

PRB/mbo

Enclosures

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

Certificate of Service

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

Office of Consumer Advocate's Interrogatory: Set X OCA-X-1 and OCA-X-3, Set XIII, OCA-XIII-5.

Philadelphia Area Industrial Energy Users Group's Interrogatory: Set VI PAIEUG-VI-9.

Office of Small Business Advocate's Interrogatory: Set I OSBA-I-9.

Allegheny Power's Interrogatories: Set I Allegheny-I-2, Allegheny-I-3, Allegheny-I-10 and Allegheny-I-11.

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Environmentalists' Interrogatories: Set I Environmentalists-I-5, Environmentalists-I-8 through Environmentalists-I-12, Environmentalists-I-25, Environmentalists-I-26, Environmentalists-I-28, Environmentalists-I-31 and Environmentalists-I-33.

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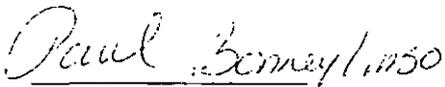
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Dated: May 29, 1997



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May 29, 1997

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

Dear Derrick:

Enclosed is PECO Energy Company's Answer to Philadelphia Area Industrial
Energy Users Group's Interrogatory:

Set VI PAIEUG-VI-9.

Sincerely,

Paul Bonney/mbo

Paul Bonney

PRB/mbo

Enclosures

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

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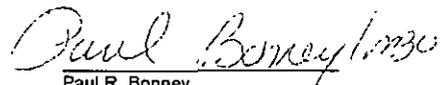
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Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
(215) 841-4252

Dated: May 29, 1997

DATE: May 30, 1997

SUBJECT: R-00973953
R-00973954

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TO: Office of Administrative Law Judge

FROM: *WJZ* John G. Alford, Secretary

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PECO ENERGY COMPANY RESTRUCTURING PLAN
(R-00973953)

PENNSYLVANIA POWER & LIGHT COMPANY
RESTRUCTURING PLAN (R-00973954)

KJR

Attached is copy of a Petition to Intervene of the Pennsylvania Petroleum Association filed in connection with the above docketed proceedings.

This matter is assigned to your Office for appropriate action.

Attachment

cc: OTS

wjz

SUSAN M. SHANAMAN

ATTORNEY AT LAW

MEM

212 North Third Street
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May 30, 1997

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

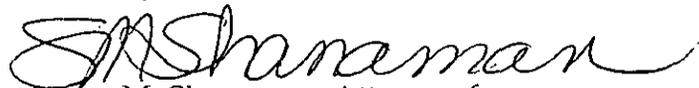
Dear Mr. McNulty:

Enclosed for filing please find an original and three copies of a Motion to Intervene in the above-captioned proceeding on behalf of The Center for Energy and Economic Development.

Copies of the document have been served in accordance with the attached certificate of service.

Any questions, please contact me.

Sincerely,



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

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

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CERTIFICATE OF SERVICE

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

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Susan M. Shanaman

Attorney for the Center for Energy
and Economic Development

Dated: May 30, 1997

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RE: In the Matter of PECO Energy ;
Company's ;
Application for Approval of ;
Restructuring Plan ;

Docket No.
R-00973953

R

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PETITION TO INTERVENE OF
THE CENTER FOR ENERGY AND ECONOMIC DEVELOPMENT

The Center for Energy and Economic Development ("CEED"), by and through its undersigned attorney, and pursuant to the Commission's rules at 52 Pa. Code Section 5.71 et seq, hereby petitions to intervene in the above-captioned matter. In support thereof, CEED states as follows:

1. The name and address of the entity seeking intervention is as follows:

The Center for Energy and Economic Development
John Paul, President
500 Burton Avenue, Suite 2-A
Nothfield, NJ 08225
609-383-0066
609-383-0015(fax)

2. CEED will be represented in this proceeding by the following counsel:

Susan M. Shanaman, Esquire
212 North Third Street, Suite 203
Harrisburg, PA 17101
717-236-2055
717-236-2070(fax)

3. CEED is actively involved in electric competition issues in Pennsylvania

and around the nation. CEED is an association of many industries economically allied

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with the coal industry.

4. On December 3, 1996, Governor Ridge signed the Electricity Generation Choice and Competition Act into law, 66 Pa.C.S. Section 2801, et seq. This Act requires the restructuring of Pennsylvania's electric industry to implement the transition from the monopoly provision of electricity supply to a competitive market.

5. This transition and the restructuring of the industry must be accomplished in a manner consistent with the Act and consistent with the stimulation of economic development, while providing the benefits of reduced pricing and improved services to residential and business customers throughout the Commonwealth.

6. In recent years, several factors have led to false or misleading impressions about the production and use of coal in America. These negative impressions are coupled with a lack of understanding about the critical role that coal plays in our nation's, and state's economy and global competitiveness. Coal is America's abundant and economic energy source generating nearly sixty percent (60%) of our electricity. Both at home and abroad, inexpensive electricity fosters economic development, stimulates job growth, and raises standards of living.

7. CEED would note that nearly eighty-six percent (86%) of Pennsylvania's bituminous coal distribution during the past year was to electric utilities, with almost fifty-six percent (56%) to generation plants within the state's borders.

8. CEED is particularly concerned as to the Commission's being presented with the opportunity to adopt environmental regulation under the guise of

restructuring, such additional environmental regulation having no legal justification in the law. It is CEED's belief that the Commission should not take any action which would prevent coal from reaching its full potential as a fuel of the future, or worse, could relegate coal into second class status as a fuel, denied access to markets.

9. CEED member companies have a substantial interest in this proceeding which is not adequately represented by any other party. As its member companies may be customers or involved in the supplying of materials to the Company, CEED has a direct, immediate and substantial interest in the subject matter of the proceeding.

10. CEED recognizes that certain procedural dates have already been set forth in this proceeding. CEED would intend, upon being apprised of their nature, to abide by such schedules as have been previously established.

WHEREFORE, for all of the foregoing reasons, The Center for Energy and Economic Development respectfully requests the Commission to grant this Petition to Intervene as a party of record in this proceeding.

Respectfully submitted,

The Center for Energy and Economic
Development



Susan M. Shanaman
212 North Third Street, Suite 203
Harrisburg, PA 17101
717-236-2055

Dated: May 30, 1997

LAW OFFICES
WOLF, BLOCK, SCHORR AND SOLIS-COHEN

305 N. FRONT STREET
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HARRISBURG, PA 17101-1236

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FACSIMILE: (717) 237-7161

DIRECT DIAL NUMBER:
(717) 237-7173

May 30, 1997

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VIA FAX AND OVERNIGHT DELIVERY

Paul R. Bonney, Esquire
PECO
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

000502
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PROTHONOTARY'S OFFICE

Dear Paul:

Enclosed are Enron's Fourth Set of Interrogatories to PECO in the above-captioned matter. I also enclose a disk as you have requested.

Very truly yours,


Daniel Clearfield

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

DC/lww

Enclosures

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

DSB:430981.1

CERTIFICATE OF SERVICE

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

VIA FAX AND OVERNIGHT DELIVERY

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

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JUN 04 1997

VIA FIRST CLASS MAIL

Kenneth L. Mickens, Esquire
Pennsylvania Public Utility Comm.
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Harrisburg, PA 17105-3265

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Derrick Williamson, Esquire
McNees, Wallace & Nurick
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Christopher B. Craig, Esq.
Democratic Committee on Appropriations
Room 545, Main Capitol Bldg.
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Ambler, PA 19002-3901

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Bruce A. Connell, Esquire
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Legal Department
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Houston, TX 77079

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



Daniel Clearfield, Esq.

Dated: May 30, 1997

**COMMUNITY
LEGAL
SERVICES, INC.**

1424 CHESTNUT STREET
PHILADELPHIA, PA 19102
215-981-3700
FAX 215-981-0434

KJR

000568

May 30, 1997

BY FAX

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

DOCUMENT
FOLDER

RECEIVED
PROTHONOTARY'S OFFICE

97 JUN -2 AM 10:31

RE: Application of PECO Energy Company
Docket No. R - 00973953
Discovery

Dear Mr. Bonney:

I enclose Interrogatories Set I of CEPA et al.

Please send, for overnight delivery, two copies of your responses to me and one copy each to:

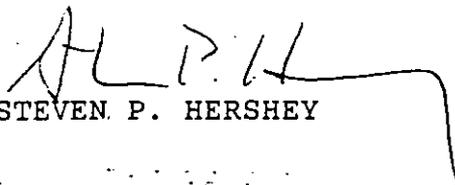
Peter Bradford
P.O. Box 497
Peru, Vermont 05152

Richard Silkman
163 Main Street
Yarmouth, Maine 04096

I would appreciate it if you would send answers as they are completed rather than waiting for completion of the entire set.

If you have any questions, please call rather than first objecting.

Yours truly,


STEVEN P. HERSHEY

cc Service list

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JUN 04 1997

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

04 1997

000569

97 JUN -2 AM 10:31

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

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INTERROGATORIES OF CEPA ET AL. - SET 1

CEPA et al. hereby propound the following interrogatories and requests for documents pursuant to 52 Pa. Code §5.341, subject to the standard instructions currently in use.

1. With reference to page 11 of the Application of PECO Energy Company, provide (in greater detail than is provided in Exhibit SRX - 1) workpapers and explain the derivation of the statement that the "estimated ongoing annual cost of PECO's universal service and energy conservation programs is \$35.7 million..."
2. Provide copies of all studies or evaluations of the PECO CAP and CAP 2 programs.
3. For the CAP and CAP 2 programs, provide copies of all studies which analyze whether or not participants pay the variable cost of service and contribute to the company's fixed costs.
4. Provide the average cost of collection activities for a low income customer whose bill is delinquent.
5. Provide the average cost of termination of service for a residential customer.
6. Provide the average cost of restoration of service for a

residential customer whose service had been terminated for non-payment.

7. For FY 1995 and FY 1996, state the shortfall or difference between the amount paid by CAP and CAP 2 customers and what those customers would pay at the full residential rate if they were able to pay as billed under the full residential rate. Please provide the data separately for CAP and CAP 2.

8. With reference to the testimony of Mr. Sidak (PECO Statement No. 10), state:

a) Whether or not Mr. Sidak has received compensation from any utility, utility industry organization, or subsidiary of any utility in connection with any of the publications or other work cited in his testimony and appendix. Testimony filed on behalf of utilities need not be included the answer. The answer should include payments that were made to the American Enterprise Institute to support work performed by Mr. Sidak.

b) If the answer to the previous question is yes, state the work for which the compensation was received, the amount paid, by whom, and the dates.

9. Provide copies of all minutes and resolutions of the PECO Energy Company Board of Directors related to the possible acquisition or management of nuclear facilities outside the PECO service territory, including Three Mile Island, Maine Yankee, and any other plants.

MEMO

MCNEES, WALLACE & NURICK
ATTORNEYS AT LAW

BRUCE D. BAGLEY
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JENNIFER L. BAKER
JEFFREY F. CHAMPAGNE
JAMES P. DEANGELO
JAMES P. DOUGHERTY
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Writer's Direct Dial:
(717) 237-5446
E-Mail: dwilliam@mwn.com

May 30, 1997

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

VIA FEDERAL EXPRESS

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

Dear Mr. Bonney:

Please find enclosed two (2) copies of the Philadelphia Area Industrial Energy Users Group's Interrogatories, Set IX, to PECO Energy Company in the above-referenced proceeding.

Responses to these interrogatories are due within ten (10) days of service. Please endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly. Please send one (1) copy of your responses and all attachments to the undersigned. In addition, please provide one (1) copy of your responses and all attachments to:

Stephen J. Baron
J. Kennedy and Associates, Inc.
35 Glenlake Parkway, S.W.
Atlanta, GA 30328

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Paul R. Bonney, Esq.
May 30, 1997
Page 2

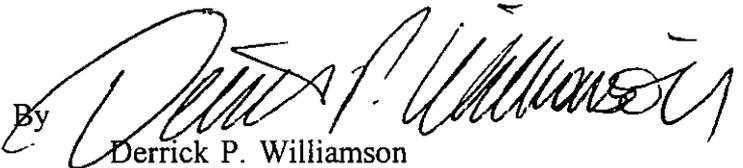
Please communicate any objections or questions that you may have to these interrogatories as quickly as possible.

Copies of these interrogatories are being served on all parties consistent with the attached Certificate of Service.

Thank you for your attention to this matter.

Very truly yours,

McNEES, WALLACE & NURICK

By 
Derrick P. Williamson

Counsel to the Philadelphia Area
Industrial Energy Users Group

DPW/eah
Enclosures

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

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JUN 05 1997

CERTIFICATE OF SERVICE

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

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Page 2

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



Derrick P. Williamson

Dated this 30th day of May, 1997, in Harrisburg, Pennsylvania.

Ethan Giddings
217 Rodman Avenue
Jenkintown, PA 19046

REC

R-00973953

ORIGINAL

May 31, 1997

PETITION TO INTERVENE

Please be advised that I am aggrieved by the proposed restructuring plan as filed by PECO with the Public Utility Commission (PUC) on April 1, 1997. As a taxpayer, public utility customer, and resident of the Commonwealth of Pennsylvania, I hereby petition to intervene in any proceedings before the PUC dealing with the above matter. Kindly send all notices and correspondence to:

Ethan Giddings
217 Rodman Avenue
Jenkintown, PA 19046

Sincerely,



Ethan Giddings

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JUN 06 1997

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