



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

IN REPLY PLEASE
 REFER TO OUR FILE

KJR

April 2, 1997

In Re: **R-00973954**

(See attached list)

Pennsylvania Power & Light Company

Application for approval of a Restructuring Plan.

NOTICE

This is to inform you that a prehearing conference on the above-captioned case will be held as follows:

Type: **Initial**
Date: **Friday, April 18, 1997**
Time: **10:00 a.m.**
Location: **Hearing Room Number 1
 Ground Floor
 North Office Building
 North Street and Commonwealth Avenue
 Harrisburg, Pennsylvania**
Presiding Officer: **Administrative Law Judge George M. Kashi
 P.O. Box 3265
 Harrisburg, PA 17105-3265
 Telephone: (717) 783-5452**

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PA PUBLIC UTILITY COMMISSION

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

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

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

R-00973954 Pennsylvania Power and Light Company

Application for approval of a Restructuring Plan

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215-751-2000
FAX: 215-751-2205

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DIRECT DIAL NUMBER

(215) 751-2278

April 4, 1997

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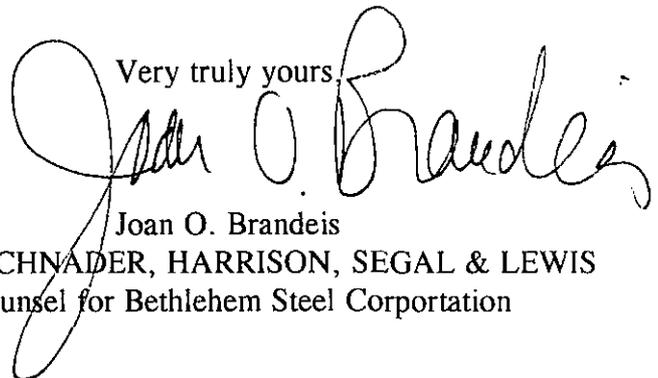
James J. McNulty, Esquire
Prothonotary
Pennsylvania Public Utility Commission
Room B-18, North Office Building
North and Commonwealth Avenues
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Power & Light Company Restructuring Plan Filing
Docket No. R-00973954**

Dear Mr. McNulty:

Enclosed please find an original and two (2) copies of a Petition to Intervene in the above captioned proceeding filed on behalf of Bethlehem Steel Corporation.

Very truly yours,



Joan O. Brandeis

For SCHNADER, HARRISON, SEGAL & LEWIS
Counsel for Bethlehem Steel Corporation

Enclosure
cc: Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
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In the Matter of Pennsylvania Power & Light
Company's Restructuring Plan

DOCKET NO. R-00973954

ORIGINAL

PETITION TO INTERVENE

Bethlehem Steel Corporation ("Petitioner"), by its attorney, hereby files this
Petition to Intervene in the above-captioned matter pursuant to 52 Pa. Code Section 5.71 et seq.
and in support thereof avers as follows:

1. The name and address of Petitioner is:

Bethlehem Steel Corporation
Martin Tower
1170 Eighth Avenue
Bethlehem, Pennsylvania 18016.

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2. Petitioner's attorney, upon whom all documents should be served is:

Joan O. Brandeis, Esquire
Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, Pennsylvania 19103.

**DOCUMENT
FOLDER**

3. On April 1, 1997, Pennsylvania Power & Light Company ("PP&L") filed its Restructuring Plan (the "Plan") pursuant to the provisions of the Electricity Generation Customer Choice and Competition Act and the schedule established by the Pennsylvania Public Utility Commission (the "Commission").

4. In the Plan, PP&L is, among other things, requesting the Commission to approve the recovery of \$4.6 billion dollars of stranded costs through the imposition of a Competitive Transition Charge ("CTC"), and proposing to close or eliminate entirely various provisions of its current rate schedules.

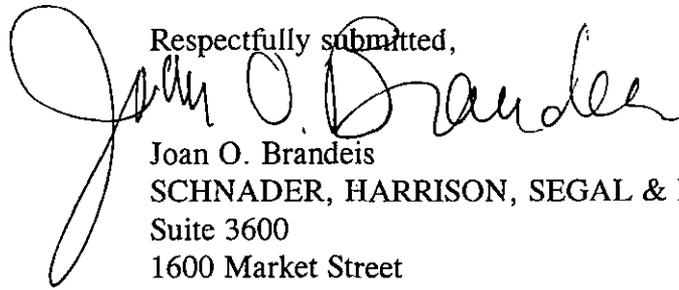
5. Petitioner is a manufacturer of steel and steel products. Its corporate headquarters is located in Bethlehem, Pennsylvania, and it operates facilities in PP&L's service territory in Bethlehem and Steelton, Pennsylvania. Petitioner is among PP&L's largest customers.

6. Imposition of a CTC to recover stranded costs of the magnitude claimed by PP&L will adversely impact Petitioner's ability to compete effectively in the market place.

7. Petitioner will be directly affected and bound by a decision in this proceeding without an opportunity to be heard if this Petition to Intervene is not granted.

Because Petitioner obtains electricity from PP&L for its Steelton, Pennsylvania plant under a special contract issued pursuant to PP&L's Rate Schedule Interruptible Service by Agreement, Petitioner's interests will not be adequately represented by existing participants in the proceeding.

WHEREFORE, Petitioner respectfully requests that its Petition to Intervene be granted.

Respectfully submitted,


Joan O. Brandeis
SCHNADER, HARRISON, SEGAL & LEWIS
Suite 3600
1600 Market Street
Philadelphia, Pennsylvania 10103
Attorneys for Petitioner

Dated: April 7, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of Pennsylvania Power & Light :
Company's Restructuring Plan :
 : DOCKET NO. R-00973954
 :
 :
 :

CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of April, 1997, served a true and correct copy of the foregoing document upon the following persons via first class mail.

Paul E. Russell, Esquire
Pennsylvania Power & Light Company
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Lisa M. Helpert, Esquire
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Charles F. Hoffman, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
P. O. Box 3265
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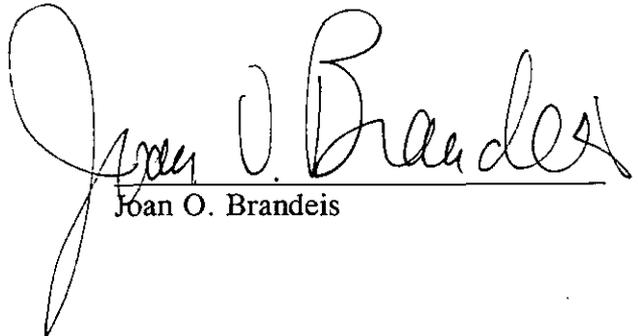
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Harrisburg, PA 17108

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
: **SS:**
COUNTY OF PHILADELPHIA :

Joan O. Brandeis, being duly sworn according to law, deposes and says that she is counsel to Bethlehem Steel Corporation, and that in this capacity she is authorized and does make this affidavit for it, and that the facts set forth in the foregoing Petition are true and correct to the best of her knowledge, information and belief.


Joan O. Brandeis

Sworn to and subscribed before me this

4th day of April, 1997



CAROLYN A. McCARTHY
COMMONWEALTH OF PENNSYLVANIA
COMMISSIONER OF DEEDS
MY COMMISSION EXPIRES 9/9/2000