

VOUGH & MECADON
ATTORNEYS AT LAW

MICHAEL T. VOUGH, ESQUIRE
GIRARD J. MECADON, ESQUIRE*

GREATER PITTSBURGH PROFESSIONAL CENTER
126 SOUTH MAIN STREET
PITTSBURGH, PENNSYLVANIA 15222-1793

TELEPHONE: (717) 654-6499
(717) 822-2725

FAX: (717) 654-6509

*ALSO ADMITTED IN WASHINGTON, D.C.

CAROL A. KOMENSKY, PARALEGAL
CHRISTINE L. KASKEL, PARALEGAL

May 1, 1997

Prothonotary
Pennsylvania Public Utility Commission
Post Office Box 3265
North Office Building
Harrisburg, PA 17105-3265

KJR

RE: PP&L's Restructuring Plan Filing Docket No. R-00973954

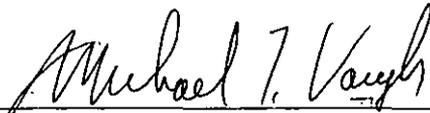
Dear Sir/Madam:

Please find enclosed one (1) original and three (3) copies of the Certificate of Service that I wish to file on behalf of The Commission on Economic Opportunity (CEO). This Certificate indicates service of the Complaint previously filed by CEO upon all appropriate parties. Thank you in advance for your professional courtesy in this regard.

0122

Very truly yours,

VOUGH & MECADON



MICHAEL T. VOUGH, ESQUIRE
Attorney for the Commission on
Economic Opportunity

RECEIVED
PROTHONOTARY'S OFFICE
MAY -5 11:20

MTV/gss

DOCUMENT
FOLDER

142

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: R-00973954

PENNSYLVANIA POWER AND LIGHT
APPLICATION FOR APPROVAL OF RESTRUCTURING PLAN

THE COMMISSION ON ECONOMIC OPPORTUNITY'S
CERTIFICATE OF SERVICE

I, Michael T. Vough, Esquire, hereby certify that on this day, May 1, 1997, I served a true and exact copy of the Complaint filed by the Commission on Economic Opportunity upon the active participants to this action listed below by providing the same via postage-paid, U.S. Mail to their respective addresses:

Paul E. Russel, Esquire
Pennsylvania Power & Light Co.
2 North Ninth Street
Allentown, PA 18101

Lisa M. Helpert, Esquire
Preston, Gates, Ellis, Rouvelas & Meeds
Suite 500
1735 New York Avenue NW
Washington DC 20006

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

Donald H. Muth
PA PUC Bureau of FUS
PO Box 3265
North Office Building
Harrisburg, PA 17105-3265

Zahmed Kaloko
PA PUC CEEP
PO Box 3265
Harrisburg, PA 17105-3265

Glenn Barton
PA PUC Bureau of Audits
PO Box 3265
Harrisburg, PA 17105-3265

John F. Povilaitis, Esquire
PA PUC Law Bureau
PO Box 3265
Harrisburg, PA 17105-3265

Irwin A. Popowsky, Esquire
Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Bernard A. Ryan, Esquire
Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

Johnnie E. Simms, Esquire
PA PUC Office of Trial Staff
PO Box 3265
Harrisburg, PA 17105-3265

000123

DOCKETED

MAY 08 1997

RECEIVED
PROTHONOTARY'S OFFICE

97 MAY -5 AM 11:20

DOCUMENT
FOLDER

David M. Kleppinger, Esquire
McNees, Wallace & Nurick
PO Box 1166
100 Pine Street
Harrisburg, PA 17108

Warren W. Mack, President
Ahlstrom Development Corp.
4350 LaJolla Village Drive
Suite 210
San Diego, CA 92122

Richard L. Caplan, Esquire
Caplan & Luber, LLP
40 Darby Rd.
Paoli, PA 19301

Craig G. Goodman, Esquire
Equitable Resources
3333 K Street NW
Suite 425
Washington DC 20007

Ginny Kreitler RMI Inc. 111
Presidential Blvd.
Suite 127
Balacynwyd, PA 19004

William Schmitt
Local 1600 IBEW
540 Grange Rd.
PO Box 470
Trexlerstown, PA 18087

Todd S. Stewart, Esquire
Malatesta, Hawke & McKeon
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17120

D Jane Drennan, Esquire
Drennan & Associates
1216 16th Street NW
Washington DC 20036

Elizabeth R. Benson
Energy Associates
7303 Timber Lane
Falls Church, VA 22046-2735

Alan Kohler, Esquire
Wolf, Block, Schorr & Solis-Cohen
305 North Front Street
Harrisburg, PA 17101-1236

Billie E. Ramsey, Executive Director
ARIPPA
1300 Market St.
Lemoyne, PA 17043

Louis J. Carter, Esquire
7300 City Line Avenue
Philadelphia, PA 19151-2291

Edwin D. Hill
IBEW
200 Corporate Center Drive
Suite 301
Corapolis, PA 15108

J Kennedy & Associates, Inc.
Suite 475
35 Glenlake Parkway
Atlanta, GA 30328

Lisa Yoho
Director of Regulatory Affairs
The Eastern Group, Inc.
2900 Eisenhower Ave.
Suite 300
Alexandria, VA 22314

Sarah T. Tomalty, Esquire
Drennan & Associates
1216 16th Street NW
Washington DC 20036

David A. McCormick, Esquire
Department of the Army
Office of the Judge Advocate General
901 North Stuart Street
Arlington, VA 22203-1837

Joan O. Brandeis, Esquire
Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, PA 19103-4252

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
1417 Blue Mountain Parkway
Harrisburg, PA 17112

Stephen J. Selden, Esquire
Bethlehem Steel Corp.
Eighth & Eaton Avenues
Bethlehem, PA 18016

Norman J. Kennard, Esquire
Malatesta, Hawke & McKeon
100 North Tenth Street
Harrisburg, PA 17101

Noel H. Trask, Esquire
PECO Energy Co.
2301 Market Street
Philadelphia, PA 19101-8699

Paul E. Nordstrom, Esquire
901 15th Street NW
Washington DC 20005

Scot H. Debroff, Esquire
PA PUC Office of Trial Staff
PO Box 3265
Harrisburg, PA 17105-3265

Scott J. Rubin, Esquire
Internat'l Brotherhood of
of Electrical Workers
Local 1600
3 Lost Creek Drive
Selingsgrove, PA 17870

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, PA 17101-1507

Wayne M. Thomas, Esquire
Kohn, Nast & Graff, PC
1101 Market Street
24th Floor
Philadelphia, PA 19107

Robert P. Haynes III, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, PA 17110-0950

Eric J. Epstein
2308 Brandywine Drive
Harrisburg, PA 17110

Stephen L. Huntoon, Esquire
PECO Gas Supply Co.
2301 Market Street
Philadelphia, PA 19101-8699

Kenneth Zielonis, Esquire
Stevens & Lee
208 North Third Street
Suite 310
Harrisburg, PA 17101

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

Craig A. Doll, Esquire
Delmarva Power & Light
214 State St.
Harrisburg, PA 17101

Harry S. Geller, Esquire
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Terrance J. Fitzpatrick, Esquire
Ryan, Russel, Ogden & Seltzer
800 North Third St.
Suite 101
Harrisburg, PA 17102

Michael A. Stosser, Esquire
Kraft Foods, Inc.
815 Connecticut Avenue NW
Suite 200
Washington DC 20006-4004

DATED THIS DAY, MAY 1, 1997:



MICHAEL T. VOUGH, ESQUIRE
Greater Pittston Professional Center
126 South Main Street
Pittston, PA 18640-1793

COMMONWEALTH OF PENNSYLVANIA

DATE: May 2, 1997

SUBJECT: R-00973954

TO: Office of Administrative Law Judge

FROM: *WJZ* John G. Alford, Secretary

APPLICATION OF PENNSYLVANIA POWER & LIGHT COMPANY
FOR APPROVAL OF ITS RESTRUCTURING PLAN

Attached is copy of a Petition to Intervene of the Commission on Economic Oportunity filed in connection with the above docketed proceeding.

This matter is assigned to your Office for appropriate action.

Attachment

cc: OTS

wjz

DOCKETED

MAY 05 1997

**DOCUMENT
FOLDER**

METTE, EVANS & WOODSIDE

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

HOWELL C. METTE
JAMES W. EVANS
ROBERT MOORE
CHARLES B. ZWALLY
PETER J. RESSLER
LLOYD R. PERSUN
CRAIG A. STONE
JAMES A. ULSH
DANIEL L. SULLIVAN

STEVEN D. SNYDER
CHRISTOPHER C. CONNER
ELYSE E. ROGERS
JEFFREY A. ERNICO
ANDREW H. DOWLING
MICHAEL D. REED
ROBERT P. HAYNES III
PAULA J. LEICHT
GARY J. HEIM

3401 NORTH FRONT STREET
P.O. BOX 5950
HARRISBURG, PA 17110-0950

TELEPHONE
(717) 232-5000

FAX
(717) 236-1816

<http://www.mette.com>

DAVID A. FITZSIMONS
MICHAEL D. PIPA
CUY P. BENEVENTANO
THOMAS F. SMIDA
ROBYN KATZMAN BOWMAN
JOHN F. YANINEK
KATHLEEN DOYLE YANINEK
DANIEL M. CAMPBELL
ANTHONY T. LUCIDO

TODD A. FULLER
ELIZABETH J. GOLDSTEIN*
BRADLEY A. WALKER
JEFFREY T. RUSSELL*

RETIRED
ROBERT E. WOODSIDE
*NJ BAR

May 2, 1997

ORIGINAL

James J. McNulty, Prothonotary
Pennsylvania Public Utility Commission
B-20 New Filings, North Office Building
P. O. Box 3265
Harrisburg, PA 17105-3265

RE: Application of Pennsylvania Power & Light Company,
Docket No. R-00973954

Dear Prothonotary McNulty:

Enclosed for filing are an original and three (3) copies of Pennsylvania Electric Consumers Council's Petition to Intervene. Copies have been served on all parties as evidenced by the attached Certificate of Service.

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

Sincerely yours,


Robert P. Haynes

RPH/me
Enclosure
cc: Administrative Law Judge George M. Kashi
All parties per Certificate of Service

RECEIVED
97 MAY - 2 PM 3:14
PAPUC
PROTHONOTARY'S OFFICE

KJR

28

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania Power & Light :
Company for Approval of its Restructuring : Docket No. R-00973954
Plan Under Section 2806 of the Public :
Utility Code. :

ORIGINAL

**PETITION TO INTERVENE
OF
PENNSYLVANIA ELECTRIC CONSUMERS COUNCIL**

Pursuant to Section 5.72 of the Commission's Rules of Practice and Procedure, 52 Pa. Code §5.72, the Pennsylvania Electric Consumers Council ("PECC"), by and through its counsel, METTE, EVANS & WOODSIDE, respectfully submits this petition to intervene.

1. PECC consists of the Pennsylvania Petroleum Association and its members who use electricity purchase and compete against Pennsylvania Power & Light Company in the space heating requirement's of customers.

2. All notices, communications, pleadings and orders should be addressed to the following:

Robert P. Haynes, III, Esquire
METTE, EVANS & WOODSIDE
3401 North Front Street
P. O. Box 5950
Harrisburg, PA 17110-0950
(717) 232-5000
(717) 236-1816 (Fax)

DOCKETED

MAY 06 1997

DOCUMENT
FOLDER

RECEIVED
MAY - 2 PM 3:14
PA.P.U.C.
PETITIONARY'S OFFICE

3. The intervention is necessary and appropriate to allow PECC to pursue that PP&L's filing will not allow subsidization of services. Fair competition is necessary pursuant to the Electricity Generation Customer Choice and Competition Act, and PP&L's filings and practices have sought PUC approval for unwarranted subsidization of services provided in competition to PECC members. PECC members compete against PP&L and seek to ensure that PP&L does not subsidize its services, but allocates costs properly and consistent with the cost to serve. PECC members participated in PP&L's last general rate increase application.

WHEREFORE, Pennsylvania Electric Consumers Council respectfully requests that its intervention be granted and that it receive active party status with full rights and privileges afforded such status.

Respectfully submitted,

METTE, EVANS & WOODSIDE



Robert P. Haynes, III, Esquire
3401 North Front Street
P. O. Box 5950
Harrisburg, PA 17110-0950
(717) 232-5000

DATED: May 2, 1997

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania Power & Light :
Company for Approval of its Restructuring : Docket No. R-00973954
Plan Under Section 2806 of the Public :
Utility Code. :

CERTIFICATE OF SERVICE

Paul E. Russell, Esquire
Pennsylvania Power & Light Co
Two North Ninth Street
Allentown, PA 18101
Attorneys for PP&L

Stephen J. Selden, Esquire
Assistant General Counsel
Bethlehem Steel Corp.
8th & Eaton Avenues
Bethlehem, PA 18016

Thomas P. Gadsden, Esquire
David B. MacGregor, Esquire
Morgan, Lewis & Bockius
One Commerce Square
417 Walnut Street
Harrisburg, PA 17101-1904

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

David A. McCormick, Esquire
Regulatory Law Office
Office of the Judge Advocate General
Dept of the Army, DAJA-RL 3848
901 N Stuart Street, Room 713
Arlington, VA 22203-1837

Johnnie E. Simms, Esquire
Scott DeBroff
Office of Trial Staff
Pa Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Karen Oill Moury, Esquire
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North 2nd Street
Harrisburg, PA 17101

Tanya J. McCloskey, Esquire
James Milling
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

James P. Melia, Esquire
Daniel P. Delaney, Esquire
Kirkpatrick & Lockhart
240 North 3rd Street
Harrisburg, PA 17101-1507

Eric J. Epstein
2308 Brandywine Drive
Harrisburg, PA 17110

Alan J. Barak, Esquire
c/o Penn Energy Project
3700 Vartan Way
Harrisburg, PA 17110
Attorney for the Environmentalists

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870-9357
Attorney for International
Brotherhood of Electrical Workers,
Local 1600

D. Jane Drennan, Esquire
Sarah E. Tomalty, Esquire
Drennan & Associates
1216 16th Street, N.W.
Washington, DC 20036

Joan O. Brandeis, Esquire
Schnader, Harrison, Segal
& Lewis
30 N. Third Street, Suite 700
Harrisburg, PA 17101

Donald A. Helpert
Lisa M. Helpert
Preston, Gates, Ellis
and Rouvelas
Meeds, LLP, Suite 500
1735 New York Avenue, N.W.
Washington, DC 20006

Daniel Clearfield, Esquire
Alan Kohler, Esquire
Robert J. Longwell, Esquire
Wolf, Block, Schorr
and Solis-Cohen
305 North Front Street
Harrisburg, PA 17101-1236
Attorneys for Enron Corp.

Billie E. Ramsey, Exec. Dir.
ARIPPA
1300 Market Street
Lemoyne, PA 17043

Craig R. Kuennen, Energy Services Mgr.
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, PA 18701-1596

Noel H. Trask, Esquire
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699
Attorneys for PECO Energy Company

Paul E. Nordstrom, Esquire
Verner, Liipfert Bernhard,
McPherson and Hand
901 15th Street, N.W.
Washington, DC 20005

John L. Munsch, Esquire
Allegheny Power
800 Cabin Hill Drive
Greensburg PA 15601
Attorneys for Allegheny Power

METTE, EVANS & WOODSIDE


3401 North Front Street
P. O. Box 3265
Harrisburg, PA 17110-0950
(717) 232-5000

DATED: May 2, 1997



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

ORIGINAL

Paul E. Russell
Associate General Counsel
610/774-4254

FAX: 610/774-6726

May 2, 1997

KJR

VIA FEDERAL EXPRESS

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

RECEIVED

MAY 2 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying answers to interrogatories that Pennsylvania Power & Light Company served today on the active participants in this proceeding.

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

Very truly yours,

Paul E. Russell/dtw

Paul E. Russell

Attachment

DOCUMENT
FOLDER

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

RECEIVED

MAY 2 1997

I hereby certify that I have this day served a true copy of Pennsylvania
PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

Power & Light Company's answers to the Office of Consumer Advocate's Interrogatories, Set II numbered 21 and 22 and Set III number 14, upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

Johnnie Simms, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Third Floor, Pitnick Building
901 North Seventh Street - Rear
Harrisburg, PA 17105-3265

James A. Mullins, Esquire
Craig R. Burgraff, Esquire
Tanya A. McCloskey, Esquire
Office Of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

DOCKETED
MAY 07 1997

DOCUMENT
FOLDER

Karen Oill Moury, Esquire
Office Of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

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

Robert P. Haynes, III, Esquire
Mette, Evans & Woodside
3401 North Front Street
P. O. Box 5950
Harrisburg PA 17110

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

Harry S. Geller, Esquire
118 Locust Street
Harrisburg, PA 17108

Steve Huntoon, Esquire
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103

Alan Kohler, Esquire
305 North Front Street
Harrisburg, PA 17101

Mary Huwaldt, Esquire
Caplan & Luber, LLP
40 Darby Road
Paoli, PA 19301

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18040

Joel E. Newton, Esquire
901 15th Street, NW
Suite 700
Washington, DC 20005

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street
Arlington, VA 22203-1837

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

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870

Billie E. Ramsey, Executive Director
ARIPPA
1300 Market Street
Lemoyne, PA 17043

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

Robert F. Young
Deputy General Counsel
212 Locust Street
P. O. Box 1266
Harrisburg, PA 17108-1266

Michael A. Stosser, Esquire
Heller Ehrman White & McAuliffe
815 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20006-4004

Bruce A. Connell
General Counsel
600 N. Dairy Ashford, ML-1034
Houston, TX 77079

Joan O. Brandeis
Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, PA 19103-4252

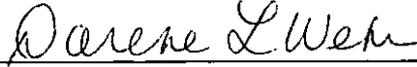
Richard LaCapra
Henry Yoshimura
LaCapra Associates
The Province Building
333 Washington Street
Boston, MA 02108

Robert Knecht
Industrial Economies, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

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

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

Dated this 2nd day of May, 1997.



Dorene L. Wehr



ORIGINAL
Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Paul E. Russell
Associate General Counsel
610/774-4254

FAX: 610/774-6726

May 2, 1997

KJR

VIA FEDERAL EXPRESS

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

RECEIVED

MAY 2 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying answers to interrogatories that Pennsylvania Power & Light Company served today on the active participants in this proceeding.

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

Very truly yours,

Paul E. Russell/dw

Paul E. Russell

Attachment

**DOCUMENT
FOLDER**

BEFORE THE 
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

RECEIVED

MAY 2 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

I hereby certify that I have this day served a true copy of Pennsylvania

Power & Light Company's answers to the Office of Trial Staff's Interrogatories,
Set RB number 15 upon the active participants listed below, in accordance with the
requirements of §1.54 (relating to service by a participant):

Federal Express

Johnnie Simms, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Third Floor, Pitnick Building
901 North Seventh Street - Rear
Harrisburg, PA 17105-3265

James A. Mullins, Esquire
Craig R. Burgraff, Esquire
Tanya A. McCloskey, Esquire
Office Of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

DOCKETED
MAY 07 1997

**DOCUMENT
FOLDER**

Karen Oill Moury, Esquire
Office Of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

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

Robert P. Haynes, III, Esquire
Mette, Evans & Woodside
3401 North Front Street
P. O. Box 5950
Harrisburg PA 17110

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

Harry S. Geller, Esquire
118 Locust Street
Harrisburg, PA 17108

Steve Huntoon, Esquire
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103

Alan Kohler, Esquire
305 North Front Street
Harrisburg, PA 17101

Mary Huwaldt, Esquire
Caplan & Luber, LLP
40 Darby Road
Paoli, PA 19301

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18040

Joel E. Newton, Esquire
901 15th Street, NW
Suite 700
Washington, DC 20005

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street
Arlington, VA 22203-1837

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

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870

Billie E. Ramsey, Executive Director
ARIPPA
1300 Market Street
Lemoyne, PA 17043

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

Robert F. Young
Deputy General Counsel
212 Locust Street
P. O. Box 1266
Harrisburg, PA 17108-1266

Michael A. Stosser, Esquire
Heller Ehrman White & McAuliffe
815 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20006-4004

Bruce A. Connell
General Counsel
600 N. Dairy Ashford, ML-1034
Houston, TX 77079

Joan O. Brandeis
Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, PA 19103-4252

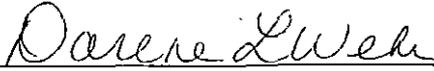
Richard LaCapra
Henry Yoshimura
LaCapra Associates
The Province Building
333 Washington Street
Boston, MA 02108

Robert Knecht
Industrial Economies, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

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

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

Dated this 2nd day of May, 1997.



Dorene L. Wehr



ORIGINAL
Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Paul E. Russell
Associate General Counsel
610/774-4254

FAX: 610/774-6726

May 5, 1997

VIA FEDERAL EXPRESS

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

DOCUMENT
FOLDER

RECEIVED

MAY 5 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying answers to interrogatories that Pennsylvania Power & Light Company served today on the active participants in this proceeding.

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

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DOCKETED

MAY 07 1997

RECEIVED

MAY 5 1997

CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

I hereby certify that I have this day served a true copy of Pennsylvania

Power & Light Company's answers to the Office of Consumer Advocate's Interrogatories, Set II, Questions 38, 42, 43, 45, 46 and Set III, Questions 38 and 39, upon the active participants listed below, in accordance with the requirements of §1.54

(relating to service by a participant):

Federal Express

Johnnie Simms, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Third Floor, Pitnick Building
901 North Seventh Street - Rear
Harrisburg, PA 17105-3265

James A. Mullins, Esquire
Craig R. Burgraff, Esquire
Tanya A. McCloskey, Esquire
Office Of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

DOCUMENT
FOLDER

Karen Oill Moury, Esquire
Office Of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

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

Robert P. Haynes, III, Esquire
Mette, Evans & Woodside
3401 North Front Street
P. O. Box 5950
Harrisburg PA 17110

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

Harry S. Geller, Esquire
118 Locust Street
Harrisburg, PA 17108

Steve Huntoon, Esquire
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103

Alan Kohler, Esquire
305 North Front Street
Harrisburg, PA 17101

Mary Huwaldt, Esquire
Caplan & Luber, LLP
40 Darby Road
Paoli, PA 19301

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18040

Joel E. Newton, Esquire
901 15th Street, NW
Suite 700
Washington, DC 20005

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street
Arlington, VA 22203-1837

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

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870

Billie E. Ramsey, Executive Director
ARIPPA
1300 Market Street
Lemoyne, PA 17043

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

Robert F. Young
Deputy General Counsel
212 Locust Street
P. O. Box 1266
Harrisburg, PA 17108-1266

Michael A. Stosser, Esquire
Heller Ehrman White & McAuliffe
815 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20006-4004

Bruce A. Connell
General Counsel
600 N. Dairy Ashford, ML-1034
Houston, TX 77079

Joan O. Brandeis
Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, PA 19103-4252

Richard LaCapra
Henry Yoshimura
LaCapra Associates
The Province Building
333 Washington Street
Boston, MA 02108

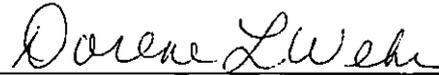
Robert Knecht
Industrial Economies, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

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

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

Bruce Biewald
Synapse Energy Economics, Inc.
101 Chilton Street
Cambridge, MA 02138

Dated this 5th day of May, 1997.



Dorene L. Wehr



ORIGINAL
Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Paul E. Russell
Associate General Counsel
610/774-4254

FAX: 610/774-6726

May 5, 1997

VIA FEDERAL EXPRESS

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

DOCUMENT
FOLDER

RECEIVED

MAY 5 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

KJR

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying answers to interrogatories that Pennsylvania Power & Light Company served today on the active participants in this proceeding.

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

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

RECEIVED

DOCUMENT
FOLDER

CERTIFICATION OF SERVICE

MAY 5 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Office of Consumer Advocate's Interrogatories, Set II numbered 35 through 37, Set III numbered 31 through 36, Set V numbered 22 through 31, upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

DOCKETED

MAY 07 1997

Johnnie Simms, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Third Floor, Pitnick Building
901 North Seventh Street - Rear
Harrisburg, PA 17105-3265

James A. Mullins, Esquire
Craig R. Burgraff, Esquire
Tanya A. McCloskey, Esquire
Office Of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Karen Oill Moury, Esquire
Office Of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

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

Robert P. Haynes, III, Esquire
Mette, Evans & Woodside
3401 North Front Street
P. O. Box 5950
Harrisburg PA 17110

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

Harry S. Geller, Esquire
118 Locust Street
Harrisburg, PA 17108

Steve Huntoon, Esquire
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103

Alan Kohler, Esquire
305 North Front Street
Harrisburg, PA 17101

Mary Huwaldt, Esquire
Caplan & Lubert, LLP
40 Darby Road
Paoli, PA 19301

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18040

Joel E. Newton, Esquire
901 15th Street, NW
Suite 700
Washington, DC 20005

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street
Arlington, VA 22203-1837

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

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870

Billie E. Ramsey, Executive Director
ARIPPA
1300 Market Street
Lemoyne, PA 17043

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

Robert F. Young
Deputy General Counsel
212 Locust Street
P. O. Box 1266
Harrisburg, PA 17108-1266

Michael A. Stosser, Esquire
Heller Ehrman White & McAuliffe
815 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20006-4004

Bruce A. Connell
General Counsel
600 N. Dairy Ashford, ML-1034
Houston, TX 77079

Joan O. Brandeis
Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, PA 19103-4252

Richard LaCapra
Henry Yoshimura
LaCapra Associates
The Province Building
333 Washington Street
Boston, MA 02108

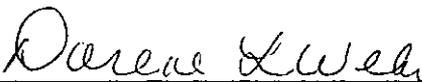
Robert Knecht
Industrial Economies, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

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

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

Bruce Biewald
Synapse Energy Economics, Inc.
101 Chilton Street
Cambridge, MA 02138

Dated this 5th day of May, 1997.



Dorene L. Wehr