



Pennsylvania Power & Light Company

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

MEM

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

FAX: 610/774-6726

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June 17, 1997

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PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

VIA FEDERAL EXPRESS

James J. McNulty, Esquire
Prothonotary
Pennsylvania Public Utility Commission
North and Commonwealth Streets
Harrisburg, Pennsylvania 17120

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

Dear Prothonotary McNulty:

Enclosed are Pennsylvania Power & Light Company's (PP&L) answers to PP&L Industrial Customer Alliance's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PP&L's answers have been served on all active participants in this proceeding.

If you have any questions regarding these answers, please call.

Very truly yours,

Paul E. Russell/dlr

Paul E. Russell

Enclosures

cc: Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

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CERTIFICATION OF SERVICE _____

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to PP&L Industrial Customer Alliance's Interrogatories, Set VIII, Questions 1, 4, 8, 10, 12, and 17 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

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Caplan & Luber, LLP
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Dilworth, Paxson, Kalish and Kauffman LLP
305 N. Front Street
Suite 403
Harrisburg, PA 17101-1236

Dated this 17th day of June, 1997.



Dorene L. Wehr



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

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June 18, 1997

KJR

VIA FEDERAL EXPRESS

James J. McNulty, Esquire
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RECEIVED

JUN 18 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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DOCUMENT
FOLDER

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Environmentalists' Interrogatories, Set 1, Questions 1 through 4, 11, 43 through 44 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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JUN 24 1997

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Harrisburg, PA 17101-1236

Dated this 18th day of June, 1997.



Dorene L. Wehr

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

June 18, 1997

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

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Via Overnight Mail

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Harrisburg, PA 17105-3265

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PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

MEM

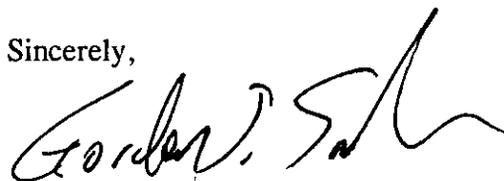
**RE: Petition for Pennsylvania Power & Light Company's Restructuring Plan,
Docket No. R-00973954**

Dear Sirs:

I've included for filing an original, 5 copies and 2 diskette copies of the Petition for Leave to Intervene and Participate of Duke Energy Trading and Marketing, L.L.C. in the above-referenced docket. Please return two stamped copies in the attached envelope for our records.

Thank you for your attention to this matter.

Sincerely,



Gordon Smith

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

**DOCUMENT
FOLDER**



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Pennsylvania Power & Light) Docket No.
Company for Approval of its Restructuring) R-00973954
Plan)

PETITION FOR LEAVE TO INTERVENE AND PARTICIPATE OF
DUKE ENERGY TRADING AND MARKETING, L.L.C.

This Petition for Leave to Intervene and Participate in the above-referenced proceeding is filed by Duke Energy Trading and Marketing, L.L.C. (DETM) pursuant to the Public Utility Commission's (Commission) Rules of Procedure and Practice, 52 Pa. Code § 5.71 *et. seq.*, and the Prehearing Order. DETM requests that this Motion be granted for the reasons set forth below:

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PA PUBLIC UTILITY COMMISSION
PROTODARY'S OFFICE

I.

Communications and correspondence concerning this Motion should be directed to:

Gordon J. Smith, Esq.
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3006
Telephone: (202) 429-8814
Facsimile: (202) 429-8805

John R. Orr, Esq.
DUKE ENERGY TRADING
AND MARKETING, L.L.C.
One Westchase Center, 10777 Westheimer
Suite 650
Houston, Texas 77042
Telephone: (713) 260-1800
Facsimile: (713) 260-6511

II.

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

¹ PanEnergy Trading and Market Services, L.L.C., Docket No. ER96-2921-000, Letter Order dated October 23, 1996. DETM changed its name from PanEnergy Trading and Market Services, L.L.C., effective June 18, 1997.

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

III.

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

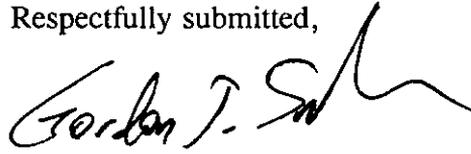
IV.

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

V.

WHEREFORE, DETM requests that the Commission grant this Motion and that DETM be made a party to this proceeding for all purposes.

Respectfully submitted,



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

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

I hereby certify that I have this day served a true copy of the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Washington D.C.: June 18, 1997



ORIGINAL

PRESTON GATES ELLIS &
ROUVELAS MEEDS LLP
ATTORNEYS

MEM

June 18, 1997

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PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

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

Dear Mr. McNulty:

Enclosed for filing in the above-referenced proceeding are an original and three copies of Pennsylvania Power & Light Company's Objections to the Pennsylvania Petroleum Association's Interrogatories, Set A. Also enclosed is an additional copy of this cover letter which we request that you date stamp as of June 18, 1997 and return in the enclosed postage-paid envelope.

As shown below and on the attached Certificate of Service, a copy of these documents has been served via facsimile and Federal Express on Administrative Law Judge George M. Kashi and counsel for the Pennsylvania Petroleum Association, and via U.S. mail on all other parties of record.

Very truly yours,

Lisa M. Helpert

Enclosures

cc: The Honorable George M. Kashi
Certificate of Service

u

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

RE: RESTRUCTURING PLAN OF
PENNSYLVANIA POWER &
LIGHT COMPANY

DOCKETED:

Docket No. R-00973954

JUN 23 1997

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JUN 18 1997

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OBJECTIONS OF
PENNSYLVANIA POWER & LIGHT COMPANY
TO INTERROGATORIES AND DOCUMENT REQUESTS
OF THE PENNSYLVANIA PETROLEUM ASSOCIATION -- SET A

PENNSYLVANIA PUBLIC UTILITY COMMISSION
TESTIMONIAL OFFICE

Pennsylvania Power & Light Company ("PP&L" or the "Company"), pursuant to 52 Pa. Code § 5.342(c), hereby files with the Pennsylvania Public Utility Commission ("PUC" or the "Commission") these objections to certain of the Pennsylvania Petroleum Association's ("Petroleum Association") Interrogatories and Document Requests, Set A. In support thereof, PP&L avers as follows:

1. By letter dated June 10, 1997, the Petroleum Association served on PP&L its Interrogatories and Document Requests, Set A. The Interrogatories and Document Requests consist of 21 questions, many of which include multiple subparts.

2. Interrogatory No. 2 states as follows:

Provide a listing of the parent, affiliates and subsidiaries of the Company. Your response should also include the following information: (a) name; (b) state and date of incorporation; (c) date business operations commenced; (d) types of business services or products offered; (e) products, services, data, assets, resources or any support provided to the parent, subsidiary or affiliate by the Company; (f) products, services, data, assets, resources or any support provided by the parent, subsidiary or affiliate to the Company; and (g) geographic area in which the parent, affiliate or subsidiary conducts its business.

3. PP&L objects to Interrogatory No. 2 because it is irrelevant, not reasonably calculated to lead to the discovery of relevant evidence, and unreasonably burdensome. The operations, services and products of the Company's parent, affiliates and subsidiaries are not at issue in this case and are irrelevant to an evaluation of PP&L's proposed plan for the transition to full competition. Interrogatory No. 2 is irrelevant and unreasonably burdensome, and therefore should be stricken.

4. Interrogatory No. 3 states as follows:

Does the Company engage in appliance sales, repair and/or maintenance operations? If yes, please answer the following questions:

- (1) please identify and describe in detail all appliance sales, repair and/or maintenance programs currently offered or provided by the Company, its parent, affiliates or subsidiaries;
- (2) provide copies of all brochures, marketing materials, or other documents which relate to such activities;
- (3) provide copies of form contracts between the Company and customers;
- (4) if the program or operation is undertaken or provided by a subsidiary or affiliate of the Company, please identify such subsidiary or affiliate;
- (5) if the program is offered by the Company, identify the division or section of the Company involved in this activity, the officer or employee in charge thereof, and the number of employees engaged in these operations;
- (6) provide the revenues, costs, profits and/or losses associated with such activities for the years 1990-1996, and explain how these figures were calculated;
- (7) provide the number of customers who have purchased or received these services;

- (8) provide copies of effective tariffs relating to such operations and activities;
- (9) does the division, subsidiary or affiliate of the Company engaged in such operations have access to and/or is provided with customer related data compiled by the Company (i.e., names, addresses, marketing leads, etc.). If yes, please identify such customers related data;
- (10) does the division, subsidiary, or affiliate of the Company engaged in such operations coordinate their activities or receive any support from any other division or section of the Company? If yes, please identify such division or section of the Company and the coordination or support provided;
- (11) provide a listing of other business entities that provide or conduct the same or similar services or operations in the Company's service territory; and
- (12) are these operations subjected to regulation at the local, state or federal level? If yes, please identify the type and extent of regulation.

5. PP&L objects to Interrogatory No. 3 because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. PP&L further objects to Interrogatory No. 3 because it is unduly burdensome and overbroad. Interrogatory No. 3, which includes 12 subparts, asks for detailed information regarding any appliance sales, repair and/or maintenance operations conducted by the Company, its parent, affiliates and subsidiaries. For example, Interrogatory No. 3(2) seeks copies of "all brochures, marketing materials, or other documents which relate to such activities." Similarly, Interrogatory No. 3(6) requests data regarding the revenues, costs, profits and/or losses associated with such activities for the seven year period 1990-1996. This interrogatory further seeks information regarding "other business entities" that provide such services within PP&L's territory. The appliance sales, repair and

maintenance operations of PP&L, its parent, affiliates, subsidiaries and "other business entities" are not at issue in this proceeding. Therefore, Interrogatory No. 3 is completely irrelevant, unreasonably burdensome and overbroad, and should be stricken.

6. Interrogatory No. 4 states as follows:

Does the Company, its parent, affiliates or subsidiaries provide energy consulting services? If yes, please answer the following questions:

- (1) please identify and describe in detail all energy consulting programs currently offered or provided by the Company, its parent, affiliates or subsidiaries;
- (2) provide copies of all brochures, marketing materials, or other documents which relate to such activities;
- (3) provide copies of form contracts between the Company and customers;
- (4) if the program or operation is undertaken or provided by a subsidiary or affiliate of the Company, please identify such subsidiary or affiliate;
- (5) if the program is offered by the Company, identify the division or section of the Company involved in this activity, the officer or employee in charge thereof, and the number of employees engaged in these operations.
- (6) provide the revenues, costs, profits and/or losses associated with such activities for the years 1990-1996, and explain how these figures were calculated;
- (7) provide the number of customers who have purchased or received these services;
- (8) provide copies of effective tariffs relating to such operations and activities;
- (9) does the division, subsidiary or affiliate of the Company engaged in such operations have access to and/or is provided with customer

related data compiled by the Company (i.e., names, addresses, marketing leads, etc.). If yes, please identify such customers related data;

- (10) does the division, subsidiary, or affiliate of the Company engaged in such operations coordinate their activities or receive any support from any other division or section of the Company? If yes, please identify such division or section of the Company and the coordination or support provided;
- (11) provide a listing of other business entities that provide or conduct the same or similar services or operations in the Company's service territory; and
- (12) are these operations subject to regulation at the local, state or federal level? If yes, please identify the type and extent of regulation.

7. Interrogatory No. 4 includes 12 subparts that mirror Interrogatory No. 3, but seek information concerning the energy consulting services provided by PP&L, its parent, affiliates, subsidiaries and other business entities. PP&L objects to Interrogatory No. 4 for the reasons previously stated in paragraph 5 above.

8. Interrogatory No. 5(B) states as follows:

At p. 27 of his Testimony, Mr. Kalt states that consumers can benefit by allowing "utilities to compete in the unregulated service markets."

- (B) Identify the unregulated service markets in which the Company, its parent, affiliates and subsidiaries currently and in the future plan to compete. Your answer should specify the specific services, programs and products which are offered or planned to be offered in these markets.

9. PP&L objects to Interrogatory No. 5(B) because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. Specifically, this interrogatory requests detailed information regarding the current and future unregulated activities

of the Company, its parent, affiliates and subsidiaries. These unregulated activities are not at issue in this proceeding and are beyond the proper scope of discovery. Interrogatory No. 5(B) therefore should be stricken.

10. Interrogatory No. 12 states as follows:

Please identify and describe in detail all “unregulated” activities of the Company, its parent, affiliates and subsidiaries.

11. PP&L objects to Interrogatory No. 12 for the reasons stated in paragraph 9 above.

12. Interrogatory No. 15 states as follows:

Please identify any other electric utility under the jurisdiction of the PUC that has proposed rates under which half or some portion of the competitive transition charge is recovered through a fixed monthly customer charge.

13. PP&L objects to Interrogatory No. 15 because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. Information regarding the proposed rates and competitive transition charges of other jurisdictional electric utilities is completely irrelevant to this proceeding. Interrogatory No. 15, therefore, should be stricken.

THEREFORE, for the reasons stated above, PP&L's objections to the Petroleum Association's Set A Interrogatories and Document Requests numbers 2, 3, 4, 5(B), 12 and 15 should be sustained and the aforementioned interrogatories and document requests stricken.

Respectfully submitted,



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

Donald A. Kaplan
Lisa M. Helpert
Preston Gates Ellis & Rouvelas Meeds LLP
1735 New York Avenue, N.W.
Suite 500
Washington, D.C. 20006-5209

Counsel For Pennsylvania Power & Light Company

Date: June 18, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's objections to Interrogatories and Document Requests of The Pennsylvania Petroleum Association, Set 1 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

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Roland, Fogel, Koblentz & Carr, LLP
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Albany, New York 12207

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Alan J. Barak, Esquire
1417 Blue Mountain Parkway
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Johnnie Simms, Esquire
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Pennsylvania Public Utility Commission
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Eric Epstein
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Dated this 18th day of June, 1997.

A handwritten signature in cursive script, appearing to read "Lisa M. Helpert", written over a horizontal line.

Lisa M. Helpert

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June 18, 1997

James J. McNulty, Prothonotary
Pennsylvania Public Utility Commission
Room B-20, North Office Building
Harrisburg, PA 17120

VIA HAND DELIVERY

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

Dear Prothonotary McNulty:

On April 24, 1997, the PP&L Industrial Customer Alliance ("PPLICA") filed a Formal Complaint in the above-referenced proceeding. On May 15, 1997, and June 5, 1997, PPLICA filed letters showing expansion of its membership. By this letter, PPLICA's membership for purposes of this proceeding have been further revised to now include the following 18 companies:

- Air Products and Chemicals, Inc.
- Alumax
- Appleton Papers Inc.
- Armstrong World Industries
- Bethlehem Steel Corporation
- CertainTeed Corporation
- Hercules Cement Company
- Hershey Foods Corporation
- Horsehead Resource Development Co., Inc.

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James J. McNulty, Prothonotary

June 18, 1997

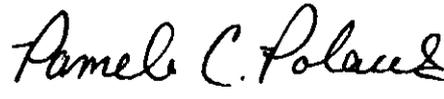
Page 2

Lafarge Corporation Whitehall Plant
Lucent Technologies
Magee Carpet Company
Praxair, Inc.
R.R. Donnelley & Sons Company
The Stroh Brewery Company
Thomson Consumer Electronics, Inc.
Victaulic Company of America
WEA Manufacturing

An original and three (3) copies of this letter are enclosed for filing with the Commission. As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this letter and kindly return it for our filing purposes. Thank you.

Respectfully submitted,

McNEES, WALLACE & NURICK

By 

Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/wjk

c: Certificate of Service
Honorable George M. Kashi (via hand delivery)

CERTIFICATE OF SERVICE

ORIGINAL

I hereby certify that I am this day serving a true copy of the foregoing letter upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Page 2

Docket No. R-00973954

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CERTIFICATE OF SERVICE

Page 3

Docket No. R-00973954

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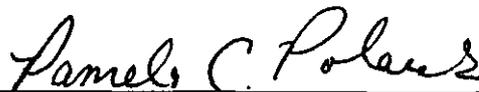
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Pamela C. Polacek, Esq.

Counsel to PP&L Industrial Customer Alliance

Dated this 18th day of June, 1997, at Harrisburg, Pennsylvania.

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PROTHONOTARY'S OFFICE

COMMONWEALTH OF PENNSYLVANIA

DATE: June 19, 1997

SUBJECT: R-00973954

MEM

TO: Office of Administrative Law Judge

FROM: *WJ* John G. Alford, Secretary

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

Attached is copy of a Petition for Leave to Intervene and Participate of Duke Energy Trading and Marketing, L.L.C. filed in connection with the above docketed proceeding.

This matter is assigned to your Office for appropriate action.

DOCKETED
JUN 20 1997

Attachment

cc: OTS

wjz

**DOCUMENT
FOLDER**



Pennsylvania Power & Light Company

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

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KJR

June 19, 1997

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VIA FEDERAL EXPRESS

James J. McNulty, Esquire
Prothonotary
Pennsylvania Public Utility Commission
P. O. Box 3265
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JUN 19 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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

DOCUMENT
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Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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JUN 19 1997

Pennsylvania Power & Light Company :
Restructuring Plan Filing :

Docket No. R-00973954

PA PUBLIC UTILITY COMMISSION
PROTECTIVE ORDER
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CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to PP&L Industrial Customer Alliance's Interrogatories, Set VIII, Questions 9 and 16 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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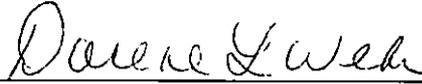
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Dated this 19th day of June, 1997.



Dorene L. Wehr

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KJR

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June 20, 1997

Honorable George Kashi
Administrative Law Judge
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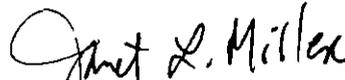
RE: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light
Company (PP&L's Restructuring Plan); Docket No. R-00973954;
**IDENTIFICATION OF WITNESS ON BEHALF OF MID-ATLANTIC
POWER SUPPLY ASSOCIATION**

Dear Judge Kashi:

Mid-Atlantic Power Supply Association ("MAPSA") intends to present the testimony of one witness in connection with the above-captioned matter. MAPSA's witness will be Donald Johnstone of Brubaker & Associates, Inc., St. Louis, Missouri. In accordance with Prehearing Orders issued in this matter, Mr. Johnstone's direct testimony will be served on or before July 2, 1997.

If you have any questions, please feel free to call me.

Very truly yours,



William T. Hawke
Janet L. Miller
Todd S. Stewart
Counsel for Mid-Atlantic Power
Supply Association

cc: All Active Parties

INDEXED

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I hereby certify that I am this day serving a copy of the foregoing document upon the person named and in the manner indicated below.

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Janet L. Miller

DATED: June 20, 1997



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VIA FEDERAL EXPRESS

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

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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 20 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

Pennsylvania Power & Light Company :
Restructuring Plan Filing :

Docket No. R-00973954

DOCUMENT
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CERTIFICATION OF SERVICE

DOCKETED

JUN 26 1997

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to Enron Capital & Trade Resources' Interrogatories, Set III, Questions 1, 2, 6 and 8 through 14 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

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Dilworth, Paxson, Kalish and Kauffman LLP
305 N. Front Street
Suite 403
Harrisburg, PA 17101-1236

Dated this 20th day of June, 1997.



Dorene L. Wehr



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

June 20, 1997

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Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

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JUN 20 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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 20 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

DOCKETED

JUN 26 1997

CERTIFICATION OF SERVICE

DOCUMENT
FOLDER

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Environmentalists' Interrogatories, Set 4, Questions 191, 193 through 195, 197 through 203, 209, 210, 213 through 224 and 229 through 232 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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305 N. Front Street
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Harrisburg, PA 17101-1236

Dated this 20th day of June, 1997.



Dorene L. Wehr



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

IN REPLY PLEASE
REFER TO OUR FILE

June 23, 1997

MEM

In Re: R-00973954

(See letter dated 05/16/97)

Pennsylvania Power & Light Company

Application for approval of a Restructuring Plan.

NOTICE

This is to inform you that a **Third Prehearing Conference on the above-captioned case will be held on Tuesday, July 15, 1997 at 10:00 a.m. in an available hearing room 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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JUN 23 1997

Please mark your records accordingly.

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.

pc: Judge Kashi
Kevin Cadden - BPL 111
John Frazier - BPL 101
Office of Trial Staff (2)
Consumer Advocate
Small Business Advocate
Bill Barrett - FUS
Norma Lewis
Janice M. Zurat, Scheduler
Beth Plantz
Docket Section
Calendar File

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ROLAND, FOGEL, KOBLENZ & CARR, LLP.

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COUNSEL
*ALSO ADMITTED TO FLORIDA BAR

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

MEM

June 23, 1997

BY TELECOPIER (717) 783-9526
AND UPS OVERNIGHT

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

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JUN 23 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Dear Mr. McNulty:

Enclosed for filing in the above-referenced proceeding are an original and three copies of the Pennsylvania Petroleum Association's Motion to Compel Pennsylvania Power & Light To Provide Responses to Interrogatories Nos. 2, 3, 4, 5(B), 12 and 15 of the Pennsylvania Petroleum Association. Please date stamp our "File Copy" and return in the enclosed self-addressed, postage pre-paid envelope.

As shown below and on the attached Certificate of Service, a copy of these documents has been served via facsimile and UPS Overnight on Administrative Law Judge George M. Kashi and counsel for the Pennsylvania Power & Light Company, and via U.S. mail on all other active parties of record.

DOCUMENT
FOLDER

Very truly yours,

Usher Fogel
Usher Fogel

UF/mac

Enclosures

cc: Hon. George M. Kashi (by telecopier and by UPS Overnight)
Lisa M. Helpert, Esq. (by telecopier and by UPS Overnight)
Active Parties to Docket No. R-00973954 (by first class mail)

80

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JUN 23 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

APPLICATION OF PENNSYLVANIA)
POWER & LIGHT COMPANY FOR)
APPROVAL OF ITS RESTRUCTURING)
PLAN UNDER SECTION 2806 OF THE)
PUBLIC UTILITY CODE)

Docket No. R-00973954

MOTION TO COMPEL PENNSYLVANIA POWER & LIGHT COMPANY
TO PROVIDE RESPONSES TO
INTERROGATORIES NOS. 2, 3, 4, 5(B), 12 AND 15
OF THE PENNSYLVANIA PETROLEUM ASSOCIATION

TO THE HONORABLE GEORGE M. KASHI:

By this Motion, filed pursuant to 52 Pa. Code §5.324(e), the Pennsylvania Petroleum Association ("PPA"), respectfully requests that the Pennsylvania Power & Light Company ("PP&L" or "Company") be compelled to provide responses to PPA's Interrogatories Nos. 2, 3, 4, 5(B), 12 and 15. In support of this Motion, the PPA alleges as follows:

1. This proceeding involves PP&L's requests for approval of its Restructuring Plan that was submitted on or about April 1, 1997 in accordance with the Electricity Generation Competition and Customer Choice Act, 66 Pa. C.S. §§2801 et seq. (the "Act").

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FOLDER JUN 25 1997

2. On June 10, 1997, the PPA served Interrogatories Nos. 1-26 on PP&L. On June 18, 1997, PP&L filed Objections to PPA's Interrogatories Nos. 2, 3, 4, 5(B), 12 and 15. A copy of said Objections is attached hereto as Exhibit "A", and made a part hereof.

3. The Company avers that the challenged interrogatories and document requests are irrelevant to the issues under consideration in this proceeding, unreasonably burdensome and overbroad. These claims are erroneous as a matter of fact and law and do not present a reasonable basis to support the Company's failure to respond to the challenged requests.

4. The goal of this proceeding is to guide the utility's emergence into a deregulated environment, under which the Company will be engaged in the provision of certain regulated and unregulated services in direct competition with independent vendors. This will require the unbundling of all services currently provided by the Company and the restructuring of existing rates and services. Upon completion of this process, consumers will be able to make informed and economically efficient purchasing decisions concerning the provision of electricity and related services.

5. It is evident that the development of an open and even competitive market will be directly impacted by the corporate structure chosen by the Company to guide its transition into the deregulated market, as well as the various regulated and unregulated services related to the sale of electricity which will be provided by the

Company or its affiliates in direct competition with independent vendors.

6. The importance of examining all electric services provided by the utility in an unregulated environment was emphasized in the Act, recognized by the Commission and repeatedly emphasized by the Company.

7. Section 2806 of the Act specifically directs each affected utility to file a restructuring plan which includes

"unbundled prices or rates for generation, jurisdictional transmission, distribution and other services."

Electric Competition and Customer Choice Act, 66 Pa. C.S. §2806(e), emphasis supplied.

8. This language underscores the importance of fully identifying all types of services a utility would offer in connection with the sale of electricity. To assure compliance with this statutory requirement, it is, of course, necessary to identify all services the utility will offer in connection with the sale of electricity, determine whether they will be performed on a regulated or unregulated basis, and assess the accuracy and propriety of the rates and costs related thereto.

9. The Commission has also affirmed the relevance and importance of securing data concerning the utility's overall corporate activities and the delineation between regulated and non-regulated services.

10. By its Order adopted on February 13, 1997 in Docket No. M-00960890, F/3, Electric Utility Restructuring Filings Pursuant to 66 Pa. C.S.

§2806(e), the Commission directed that each utility restructuring plan include information and data related to corporate finance and structure issues. Specifically each utility (including PP&L) is ordered to:

"Provide a discussion of any contemplated acts of merger, consolidation, acquisition or disposition by the company",
and
"Provide a discussion and description of the utility's proposed functional separation between regulated and non-regulated operations."

Docket M-00960890, F/3, Order adopted 2/13/97, Appendix A, p. 31, Items O(2) and O(6).

11. The Commission has recognized that competition will be directly affected by the Company's corporate structure and the manner by which it offers and provides regulated and unregulated services.

12. *The centrality and relevance of the utility's unregulated activities are also discussed at length in the filing itself. In the Testimony of Robert M. Geneczko, the Company describes the functional separation between delivery and supply and marketing activities. Similarly, the Testimony of Joseph R. Kalt emphasizes the need for the Commission to monitor the separation of regulated and unregulated activities and emphasizes the importance of allowing utilities to compete in unregulated markets. As noted by Mr. Kalt:*

"By allowing utilities to compete in the unregulated energy service markets, on comparable terms as other competitors, regulators can further competition and efficiency..."

Testimony of Joseph R. Kalt, p. 27.

13. The utility acknowledges, however, that competition will only develop where the Commission takes "appropriate measures to ensure that open and equal access occurs so as to ensure that viable non-utility competitors have the opportunity to flourish as well." (*Id.*, pp. 27-8).

14. In summary, the development of a viable competitive market - one of the primary goals of this proceeding - will be directly impacted by the various electric services PP&L will offer either on a regulated or unregulated basis through utility personnel or by an affiliate or subsidiary. For example, the competitive market will be undermined if the Company or its affiliates offers sales customers appliance or energy management services (activities which are highly competitive) at prices which are subsidized by regulated operations. With this background, it is apparent that the challenged interrogatories are entirely appropriate and relevant to this proceeding.

15. Interrogatory No. 2 requests data and information concerning the services offered by the Company's parent, affiliate and subsidiary, as well as the interchange of assets between these related corporate entities. This information is crucial for determining any subsidies that may flow from regulated to unregulated entities and whether and how the utility's existing corporate structure may impede the competition in the provision of electric service. The transition to full competition can be directly affected by the flow of resources, assets and subsidies between regulated and

unregulated entities.

16. It is erroneous to claim that the information sought is unreasonably burdensome, for this data is available to the utility and merely asks for data directly related to the existing corporate structure.

17. Interrogatories Nos. 3 and 4 inquire whether the Company or its affiliate are engaged in electric services involving appliance repair and energy consulting. These are activities which electric utilities commonly provide either above or below the line as part of their marketing and electric distribution activities and are relevant to the utilities' stated desire to compete in unregulated service markets.

18. By these interrogatories, PPA has sought to determine whether these types of services are provided and to what degree they may impact upon the development of a fully competitive market. Obviously, these types of services can be manipulated by the utility or its affiliate to obtain a competitive advantage over independent marketers. As the information sought is primarily within the control of the utility and should be readily available to the Company, it cannot be deemed overly burdensome.

19. Moreover, it is difficult to properly assess the propriety of the utility's proposed unbundled rate structure without the data and information elicited in Interrogatories 2, 3 and 4 concerning the specific services currently provided by the Company, as well as the costs related thereto which may be recovered through existing

rates or other charges.

20. Interrogatories Nos. 5(B) and 12 are directly tied to the utility's claim at Page 27 of the Testimony of Joseph R. Kalt that consumers will benefit by allowing "utilities to compete in the unregulated service markets". In response to this Testimony, Interrogatory No. 5(B) reasonably asks the Company to identify the types of unregulated markets in which it currently and plans to compete. Obviously, it is absolutely vital to determine the specific unregulated markets in which the Company is or will be active in order to assess whether any consumer benefits will accrue.

21. Similarly, Interrogatory No. 12 inquires into the unregulated activities conducted by the utility, its parent and affiliate. Clearly, identification of the unregulated market in which the Company is or plans to be active, is a prerequisite to assessing the validity of its testimonial claims.

22. Interrogatory No. 15 merely asks the Company to identify any other utility which has proposed to recover some portion of the CTC through a monthly customer charge. The Company erroneously claims that information regarding what other jurisdictional utilities have proposed is completely irrelevant to this proceeding. We respectfully disagree. It is entirely reasonable to determine whether the utility proposal is consistent with the approach of other utilities or if it reflects an isolated view. In the case of the latter, the utility would need to show why such disparate treatment is justified. Additionally, uniformity of rate designs may be a suitable goal to help the

transition to a fully competitive market. Such uniformity would be impeded if PP&L is allowed to implement a strikingly different rate design.

WHEREFORE, based upon the foregoing, the PPA respectfully requests that PP&L be compelled to respond to Interrogatories Nos. 2, 3, 4, 5(B), 12 and 15.

Respectfully submitted,



Usher Fogel
Attorney for Pennsylvania Petroleum
Association
Roland, Fogel, Koblenz & Carr, LLP
1 Columbia Place
Albany, New York 12207
(518) 434-8112
(518) 434-3232

Dated: June 23, 1997

EXHIBIT "A"

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RE: RESTRUCTURING PLAN OF :
PENNSYLVANIA POWER & : Docket No. R-00973954
LIGHT COMPANY :

**OBJECTIONS OF
PENNSYLVANIA POWER & LIGHT COMPANY
TO INTERROGATORIES AND DOCUMENT REQUESTS
OF THE PENNSYLVANIA PETROLEUM ASSOCIATION -- SET A**

Pennsylvania Power & Light Company ("PP&L" or the "Company"), pursuant to 52 Pa. Code § 5.342(c), hereby files with the Pennsylvania Public Utility Commission ("PUC" or the "Commission") these objections to certain of the Pennsylvania Petroleum Association's ("Petroleum Association") Interrogatories and Document Requests, Set A. In support thereof, PP&L avers as follows:

1. By letter dated June 10, 1997, the Petroleum Association served on PP&L its Interrogatories and Document Requests, Set A. The Interrogatories and Document Requests consist of 21 questions, many of which include multiple subparts.

2. Interrogatory No. 2 states as follows:

Provide a listing of the parent, affiliates and subsidiaries of the Company. Your response should also include the following information: (a) name; (b) state and date of incorporation; (c) date business operations commenced; (d) types of business services or products offered; (e) products, services, data, assets, resources or any support provided to the parent, subsidiary or affiliate by the Company; (f) products, services, data, assets, resources or any support provided by the parent, subsidiary or affiliate to the Company; and (g) geographic area in which the parent, affiliate or subsidiary conducts its business.

3. PP&L objects to Interrogatory No. 2 because it is irrelevant, not reasonably calculated to lead to the discovery of relevant evidence, and unreasonably burdensome. The operations, services and products of the Company's parent, affiliates and subsidiaries are not at issue in this case and are irrelevant to an evaluation of PP&L's proposed plan for the transition to full competition. Interrogatory No. 2 is irrelevant and unreasonably burdensome, and therefore should be stricken.

4. Interrogatory No. 3 states as follows:

Does the Company engage in appliance sales, repair and/or maintenance operations? If yes, please answer the following questions:

- (1) please identify and describe in detail all appliance sales, repair and/or maintenance programs currently offered or provided by the Company, its parent, affiliates or subsidiaries;
- (2) provide copies of all brochures, marketing materials, or other documents which relate to such activities;
- (3) provide copies of form contracts between the Company and customers;
- (4) if the program or operation is undertaken or provided by a subsidiary or affiliate of the Company, please identify such subsidiary or affiliate;
- (5) if the program is offered by the Company, identify the division or section of the Company involved in this activity, the officer or employee in charge thereof, and the number of employees engaged in these operations;
- (6) provide the revenues, costs, profits and/or losses associated with such activities for the years 1990-1996, and explain how these figures were calculated;
- (7) provide the number of customers who have purchased or received these services;

- (8) provide copies of effective tariffs relating to such operations and activities;
- (9) does the division, subsidiary or affiliate of the Company engaged in such operations have access to and/or is provided with customer related data compiled by the Company (i.e., names, addresses, marketing leads, etc.). If yes, please identify such customers related data;
- (10) does the division, subsidiary, or affiliate of the Company engaged in such operations coordinate their activities or receive any support from any other division or section of the Company? If yes, please identify such division or section of the Company and the coordination or support provided;
- (11) provide a listing of other business entities that provide or conduct the same or similar services or operations in the Company's service territory; and
- (12) are these operations subjected to regulation at the local, state or federal level? If yes, please identify the type and extent of regulation.

5. PP&L objects to Interrogatory No. 3 because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. PP&L further objects to Interrogatory No. 3 because it is unduly burdensome and overbroad. Interrogatory No. 3, which includes 12 subparts, asks for detailed information regarding any appliance sales, repair and/or maintenance operations conducted by the Company, its parent, affiliates and subsidiaries. For example, Interrogatory No. 3(2) seeks copies of "all brochures, marketing materials, or other documents which relate to such activities." Similarly, Interrogatory No. 3(6) requests data regarding the revenues, costs, profits and/or losses associated with such activities for the seven year period 1990-1996. This interrogatory further seeks information regarding "other business entities" that provide such services within PP&L's territory. The appliance sales, repair and

maintenance operations of PP&L, its parent, affiliates, subsidiaries and "other business entities" are not at issue in this proceeding. Therefore, Interrogatory No. 3 is completely irrelevant, unreasonably burdensome and overbroad, and should be stricken.

6. Interrogatory No. 4 states as follows:

Does the Company, its parent, affiliates or subsidiaries provide energy consulting services? If yes, please answer the following questions:

- (1) please identify and describe in detail all energy consulting programs currently offered or provided by the Company, its parent, affiliates or subsidiaries;
- (2) provide copies of all brochures, marketing materials, or other documents which relate to such activities;
- (3) provide copies of form contracts between the Company and customers;
- (4) if the program or operation is undertaken or provided by a subsidiary or affiliate of the Company, please identify such subsidiary or affiliate;
- (5) if the program is offered by the Company, identify the division or section of the Company involved in this activity, the officer or employee in charge thereof, and the number of employees engaged in these operations.
- (6) provide the revenues, costs, profits and/or losses associated with such activities for the years 1990-1996, and explain how these figures were calculated;
- (7) provide the number of customers who have purchased or received these services;
- (8) provide copies of effective tariffs relating to such operations and activities;
- (9) does the division, subsidiary or affiliate of the Company engaged in such operations have access to and/or is provided with customer

related data compiled by the Company (i.e., names, addresses, marketing leads, etc.). If yes, please identify such customers related data;

- (10) does the division, subsidiary, or affiliate of the Company engaged in such operations coordinate their activities or receive any support from any other division or section of the Company? If yes, please identify such division or section of the Company and the coordination or support provided;
- (11) provide a listing of other business entities that provide or conduct the same or similar services or operations in the Company's service territory; and
- (12) are these operations subject to regulation at the local, state or federal level? If yes, please identify the type and extent of regulation.

7. Interrogatory No. 4 includes 12 subparts that mirror Interrogatory No. 3, but seek information concerning the energy consulting services provided by PP&L, its parent, affiliates, subsidiaries and other business entities. PP&L objects to Interrogatory No. 4 for the reasons previously stated in paragraph 5 above.

8. Interrogatory No. 5(B) states as follows:

At p. 27 of his Testimony, Mr. Kalt states that consumers can benefit by allowing "utilities to compete in the unregulated service markets."

- (B) Identify the unregulated service markets in which the Company, its parent, affiliates and subsidiaries currently and in the future plan to compete. Your answer should specify the specific services, programs and products which are offered or planned to be offered in these markets.

9. PP&L objects to Interrogatory No. 5(B) because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. Specifically, this interrogatory requests detailed information regarding the current and future unregulated activities

of the Company, its parent, affiliates and subsidiaries. These unregulated activities are not at issue in this proceeding and are beyond the proper scope of discovery. Interrogatory No. 5(B) therefore should be stricken.

10. Interrogatory No. 12 states as follows:

Please identify and describe in detail all "unregulated" activities of the Company, its parent, affiliates and subsidiaries.

11. PP&L objects to Interrogatory No. 12 for the reasons stated in paragraph 9 above.

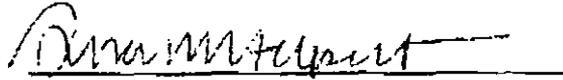
12. Interrogatory No. 15 states as follows:

Please identify any other electric utility under the jurisdiction of the PUC that has proposed rates under which half or some portion of the competitive transition charge is recovered through a fixed monthly customer charge.

13. PP&L objects to Interrogatory No. 15 because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. Information regarding the proposed rates and competitive transition charges of other jurisdictional electric utilities is completely irrelevant to this proceeding. Interrogatory No. 15, therefore, should be stricken.

THEREFORE, for the reasons stated above, PP&L's objections to the Petroleum Association's Set A Interrogatories and Document Requests numbers 2, 3, 4, 5(B), 12 and 15 should be sustained and the aforementioned interrogatories and document requests stricken.

Respectfully submitted,



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Counsel For Pennsylvania Power & Light Company

Date: June 18, 1997

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission
v.
Pennsylvania Power & Light Company
(Application for Approval of a Restructuring Plan)
Docket No. R-00973954

I hereby certify that I have this day served the foregoing document, "Motion To Compel Pennsylvania Power & Light Company to Provide a Response To Interrogatories and Requests Nos. 2, 3, 4, 5(B), 12 and 15 of the Pennsylvania Petroleum Association", by first class mail (or by facsimile and UPS Overnight as noted), postage prepaid, upon the parties of record in this proceeding.

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

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June 23, 1997

VIA FEDERAL EXPRESS

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JUN 23 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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 23 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to Enron's Interrogatories, Set 3, Questions 7 and 15 through 19 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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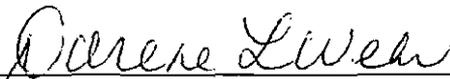
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Dated this 23rd day of June, 1997.



Dorene L. Wehr



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June 23, 1997

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PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

VIA FEDERAL EXPRESS

James J. McNulty, Esquire
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**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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 23 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

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CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Pennsylvania Petroleum Associations' Interrogatories, Set A, Questions 5, 7, 13, 14 and 16 through 21 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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JUN 23 1997

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**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 letter, please call.

Very truly yours,

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 23 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Environmentalists' Interrogatories Set 1, Questions 42, and 46 through 49, Set 4, Questions 192, 225 and 227 through 228 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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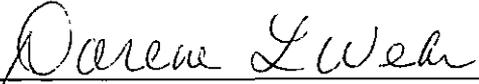
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Dated this 23rd day of June, 1997.



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June 23, 1997

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VIA FEDERAL EXPRESS

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

DOCUMENT
FOLDER

**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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 23 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

DOCKETED

JUN 26 1997

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Pennsylvania Power & Light Company's Industrial Customer Alliance's Interrogatories, Set VIII, Question 6 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

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305 N. Front Street
Suite 403
Harrisburg, PA 17101-1236

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

Dated this 23rd day of June, 1997.

Dorene L. Wehr

Dorene L. Wehr



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

June 23, 1997

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JUN 23 1997

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

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

DOCUMENT
FOLDER

**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.

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Very truly yours,

Paul E. Russell

Paul E. Russell

Attachment

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 23 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

CERTIFICATION OF SERVICE

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 XI, Questions 1 through 11 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
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Tanya A. McCloskey, Esquire
Office Of Consumer Advocate
1425 Strawberry Square
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DOCKETED

JUN 26 1997

DOCUMENT
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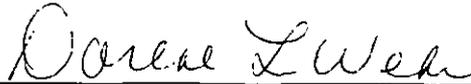
Joseph A. Dworetzky, Esquire
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Dated this 23rd day of June, 1997.


Dorene L. Wehr
Dorene L. Wehr



Pennsylvania Power & Light Company

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

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

MEM

FAX: 610/774-6726

June 23, 1997

VIA FEDERAL EXPRESS

James J. McNulty, Esquire
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JUN 24 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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

DOCUMENT
FOLDED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

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 XII, Questions 1 through 20 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
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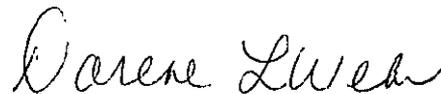
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Dated this 24th day of June, 1997.



Dorene L. Wehr



Pennsylvania Power & Light Company

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

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

MEM

FAX: 610/774-6726

June 23, 1997

VIA FEDERAL EXPRESS

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JUN 24 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 letter, please call.

Very truly yours,

Paul E. Russell/dlr

Paul E. Russell

Attachment

DOCUMENT
FOLDED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

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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 Commission on Economic Opportunity's
Interrogatories, Set II, Questions 1 through 18 upon the active participants listed
below, in accordance with the requirements of §1.54 (relating to service by a
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1 Columbia Place
Albany, NY 12207

Dated this 24th day of June, 1997.



Dorene L. Wehr

ALJ APPEARANCE SHEET

MEM

ALJ Hearing Report

Docket No. R-00973954

Case Name PENNSYLVANIA POWER & LIGHT COMPANY

Location LANCASTER

Date MAY 30, 1997

ALJ GEORGE M. KASHI

Reporting Firm Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken YES NO

Transcript Due YES NO

Hearing Concluded YES NO

Further Hearing Needed YES NO

Estimated Add'l Days

RECORD CLOSED YES NO

Briefs to be Filed YES NO

BENCH DECISION YES NO

DOCUMENT FOLDER

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OFFICE OF G.A.L.L.J.

97 JUN 18 PM 1:24

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DATE JUN 26 1997

REMARKS:

Names, Addresses and Telephone Numbers of Parties or Counsel of Record
PLEASE PRINT CLEARLY

Incomplete Information may Result in Delay of Processing

Name and Telephone Number	Address	Appearing for
Irwin A. Popowsky Telephone No. 717-783-5048	1425 Strawberry Sq City Hbg State PA Zip 17120	Pa. Office of Consumer Advocate
Karen Oll Moury Telephone No. 717-783-2525	200 N. 3rd St Suite 1102 City Hbg State PA Zip 17101	Office of Small Business Advocate
CAROL F. PENNINGTON Telephone No.	P.O. Box 3265 City HBG. State PA Zip 17105-3265	OFFICE OF TRIAL STAFF
PAUL E RUSSELL Telephone No. (610) 774-4254	2 N 9TH ST City ALLENTOWN State PA Zip 18101	PA. POWER & LIGHT CO.

Check this box if additional parties or counsel of record appear on back of form.

John A. Kelly C.R.C. Inc.
REPORTER

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No.	R-00973954
Case Name	PENNSYLVANIA POWER & LIGHT COMPANY
Location	BETHLEHEM
Date	JUNE 2, 1997
ALJ	GEORGE M. KASHI
Reporting Firm	Commonwealth Reporting

MEM

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
Hearing Held	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Testimony Taken	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Transcript Due	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Hearing Concluded	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Further Hearing Needed	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
Estimated Add'l Days	_____			
RECORD CLOSED	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
Briefs to be Filed	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
BENCH DECISION	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO

DATE _____

DATE _____

REMARKS: JUN 26 1997

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OFFICE OF C.A.L.J.
97 JUN 18 PM 1:24
PA PUC

DOCUMENT
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Name and Telephone Number	Address			Appearing for
Irwin A. Popowsky Telephone No. 717-783-5048	City Hbg	State PA	Zip 17120	Office of Consumer Advocate
Johnnie E. Simms Telephone No. 717 787-1976	City Hbg	State PA	Zip 17105	Office of TRIAL STAFF
PAUL RUSSELL Telephone No. (610) 774-4254	City ALLENTOWN	State PA	Zip 18101	PA POWER & LIGHT CO.
Karen Oill Moury Telephone No. (717) 783-2525	City Hbg	State PA	Zip 17101	Office of Small Business Advocate

Check this box if additional parties or counsel of record appear on back of form.

John A. Kelly, CRC/Inc
REPORTER

ALJ APPEARANCE SHEET

ALJ Hearing Report

KJR

Docket No.	R-00973954
Case Name	PENNSYLVANIA POWER & LIGHT COMPANY
Location	ALLENTOWN
Date	JUNE 2, 1997
ALJ	GEORGE M. KASHI
Reporting Firm	Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Hearing Held	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Testimony Taken	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Transcript Due	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Hearing Concluded	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Further Hearing Needed	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Estimated Add'l Days		
RECORD CLOSED	<input type="checkbox"/> YES	<input type="checkbox"/> NO

DATE _____

YES NO

DATE _____

YES NO

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Briefs to be Filed

BENCH DECISION

REMARKS:

3- witnesses

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Names, Addresses and Telephone Numbers of Parties or Counsel of Record
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Name and Telephone Number	Address			Appearing for
<i>Irwin Popowsky</i> Telephone No. <i>717-783-5048</i>	<i>1425 Strawberry Square</i> City <i>Hbg</i>	<i>PA</i>	<i>17120</i>	<i>Pa. Office of Consumer Advocacy</i>
<i>PAUL RUSSELL</i> Telephone No. <i>610-774-4254</i>	<i>2 N. 9TH ST</i> City <i>ALLENTOWN</i>	<i>PA</i>	<i>18101</i>	<i>PA. POWER & LIGHT CO.</i>
<i>Karen Oilmoury</i> Telephone No. <i>(717) 783-2525</i>	<i>300 N. 2nd St Suite 1102</i> City <i>Hbg</i>	<i>PA</i>	<i>17101</i>	<i>Office of Small Business Advocate</i>
<i>Johnnie E. Simms</i> Telephone No. <i>(717) 787-1976</i>	<i>P.O. Box 3265</i> City <i>Hbg</i>	<i>PA</i>	<i>17105</i>	<i>Office of TRIAL STAFF</i>

Check this box if additional parties or counsel of record appear on back of form.

John A. Kelly CRC, Inc.
REPORTER

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No.	R-00973954
Case Name	PENNSYLVANIA POWER & LIGHT COMPANY
Location	SCRANTON
Date	JUNE 3, 1997
ALJ	GEORGE M. KASHI
Reporting Firm	Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
Hearing Held	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Testimony Taken	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Transcript Due	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Hearing Concluded	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>	NO
Further Hearing Needed	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
Estimated Add'l Days				
RECORD CLOSED	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
Briefs to be Filed	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
BENCH DECISION	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO

DATE _____

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Name and Telephone Number	Address	Appearing for
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PAUL RUSSELL Telephone No. (610) 774-4254	2 N. 9TH ST. City ALLENTOWN State PA Zip 18101	PA. POWER & LIGHT CO.

Check this box if additional parties or counsel of record appear on back of form.

William J. Horst
REPORTER

ALJ Hearing Report

Docket No. R-00973954

Case Name PENNSYLVANIA POWER & LIGHT COMPANY

Location WILKES-BARRE

Date JUNE 3, 1997

ALJ GEORGE M. KASHI

Reporting Firm Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken YES NO

Transcript Due YES NO

Hearing Concluded YES NO

Further Hearing Needed YES NO

Estimated Add'l Days

RECORD CLOSED YES NO

Briefs to be Filed YES NO

BENCH DECISION YES NO

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PAUL E. RUSSELL Telephone No. (610) 774-4254	2 N. 9TH ST. City ALLENTOWN State PA Zip 18101	PA POWER & LIGHT CO.
Johnnie E. Simms Telephone No. 717 787 1576	P.O. Box 3265 City Hbg State PA Zip 17105	Office of TRIAL STAFF

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William J Horst
REPORTER

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No. R-00973954

Case Name PENNSYLVANIA POWER & LIGHT COMPANY

Location HAZLETON

Date JUNE 4, 1997

ALJ GEORGE M. KASHI

Reporting Firm Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken YES NO

Transcript Due YES NO

Hearing Concluded YES NO

Further Hearing Needed YES NO

Estimated Add'l Days _____

RECORD CLOSED YES NO

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Briefs to be Filed YES NO

DATE _____

BENCH DECISION YES NO

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Name and Telephone Number	Address	Appearing for
JAMES A. MULLINS Telephone No. (717) 783-5048	1425 STRAWBERRY ST City Hbg State PA Zip 17120	OCA
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PAUL E. RUSSELL Telephone No. (610) 774-4254	2 N. 9TH ST. City ALLENTOWN State PA Zip 18101	PA. POWER & LIGHT CO.
BERNARD A. RYAN, JR. Telephone No. (717) 793-2575	Suite 1102, Commercial Bldg 300 N. Second St City Hbg State PA Zip 17101	Office of Small BUSINESS Advocates

Check this box if additional parties or counsel of record appear on back of form.

Sandra Miles Brown
REPORTER

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No.	R-00973954
Case Name	PENNSYLVANIA POWER & LIGHT COMPANY
Location	POTTSVILLE
Date	JUNE 4, 1997
ALJ	GEORGE M. KASHI
Reporting Firm	Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Hearing Held	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Testimony Taken	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Transcript Due	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Hearing Concluded	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Further Hearing Needed	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Estimated Add'l Days	_____	
RECORD CLOSED	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Briefs to be Filed	<input type="checkbox"/> YES	<input type="checkbox"/> NO
BENCH DECISION	<input type="checkbox"/> YES	<input type="checkbox"/> NO

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<i>Bernard A. Ryan</i> Telephone No. (717) 783-2525	<i>Suite 1102, Commerce Bldg 300 N. Second St</i> City <i>Hbg</i> State <i>PA</i> Zip <i>17101</i>	<i>Office of Small Business Advocate</i>
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<i>Johnnie E. Simms</i> Telephone No. (717) 787-1976	<i>P.O. Box 3265</i> City <i>Hbg</i> State <i>PA</i> Zip <i>17105</i>	<i>Office of TRIAL STAFF</i>
<i>PAUL E. RUSSELL</i> Telephone No. (610) 774-4254	<i>2 N. 9TH ST.</i> City <i>ALLENTOWN</i> State <i>PA</i> Zip <i>18101</i>	<i>PA. POWER & LIGHT CO.</i>

Check this box if additional parties or counsel of record appear on back of form.

Sandra Miles Brun
REPORTER

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No. R-00973954

Case Name PENNSYLVANIA POWER & LIGHT COMPANY

Location WILLIAMSPORT

Date JUNE 5, 1997

ALJ GEORGE M. KASHI

Reporting Firm Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken YES NO

Transcript Due YES NO

Hearing Concluded YES NO

Further Hearing Needed YES NO

Estimated Add'l Days _____

RECORD CLOSED YES NO

Briefs to be Filed YES NO

BENCH DECISION YES NO

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Johnnie E. Simms Telephone No. (717) 787-1976	P.O. Box 3265 City Hbg State PA Zip 17105	Office of TRIAL STAFF
Bernard A. Ryan Telephone No. (717) 783-2525	1107 Commerce Bldg City Hbg State PA Zip 17101	OSBA
PAUL E. RUSSELL Telephone No. (610) 774-4254	2 N. 9TH ST City ALLENTOWN State PA Zip 18101	PA POWER & LIGHT CO.

Check this box if additional parties or counsel of record appear on back of form.

Judith A. Valencik
REPORTER
CRC, Inc.



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

MEM

June 24, 1997

VIA FEDERAL EXPRESS

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

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PA PUBLIC UTILITY COMMISSION
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**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 letter, please call.

Very truly yours,

Paul E. Russell/dew

Paul E. Russell

Attachment

DOCUMENT
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Pennsylvania Petroleum Associations' Interrogatories, Set A, Questions 6 and 8 through 11 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
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Harrisburg, PA 17120

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305 N. Front Street
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Harrisburg, PA 17101-1236
Usher Fogel, Esquire
Roland, Fogel, Loblenz & Carr LLP
1 Columbia Place
Albany, NY 12207

Dated this 24th day of June, 1997.



Dorene L. Wehr

MEM

MCNEES, WALLACE & NURICK

ATTORNEYS AT LAW

100 PINE STREET
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HARRISBURG, PA 17108-1166
TELEPHONE (717) 232-8000 Fax (717) 237-5300

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WASHINGTON, D.C. 20005
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OF COUNSEL
ROBERT H. GRISWOLD
FRANCIS B. HAAS, JR.
RICHARD R. LEFEVER
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Writer's Direct Dial:
(717) 237-5368

E-Mail: ppolacek@mwn.com

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JAMES P. DEANGELO	SHARON R. FAXTON
JAMES P. DOUGHERTY	CHAD F. PHIPPS
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DEBRA P. FOURLAS	JONATHAN H. RUDD
HELEN L. GEMMILL	BRUCE R. SPICER
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SCOTT A. GOULD	SUSAN V. STEWART
RANDOLPH B. HOUSTON, JR.	ROBERT F. TEPLITZ
BRIAN F. JACKSON	ROBERT A. WEISHAAR, JR.
BRIAN E. KAMOIE	DERRICK P. WILLIAMSON
MICHAEL R. KELLEY	JOHN A. WITHEROW, JR.
PETER F. KRIETE	KATHLEEN A. WOLOWSKI
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ALAN R. BOYNTON, JR.	FRANKLIN A. MILES, JR.
ERIC L. BROSSMAN	ROBERT A. MILLS
ROBERT M. CHERRY	STEPHEN A. MOORE
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STEPHEN R. KERN	NORMAN I. WHITE
DAVID M. KLEPPINGER	LAWRENCE R. WIEDER
BERNARD A. LABUSKES, JR.	WILLIAM M. YOUNG, JR.
DELANO M. LANTZ	

June 24, 1997

The Honorable George M. Kashi
Administrative Law Judge
Pennsylvania Public Utility Commission
Room G-08, North Office Building
Harrisburg, PA 17120

VIA HAND DELIVERY

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

Dear Judge Kashi:

For planning and scheduling purposes, the PP&L Industrial Customer Alliance ("PPLICA") wishes to advise your honor and the parties in the above-referenced proceeding that it will be offering the testimony of the following witnesses:

Steven J. Baron
Randall K. Falkenberg
Lane Kollen
James H. Rooney
Larry Stalica
James S. Schneider

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Please contact us with any questions concerning this list.

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JUL 07 1997

Respectfully submitted,

MCNEES, WALLACE & NURICK

By *Pamela C. Polacek*

Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/clc
c: Certificate of Service
James J. McNulty, Prothonotary (via hand delivery)

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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

June 24, 1997

MEM

VIA FEDERAL EXPRESS

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

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JUN 24 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 letter, please call.

Very truly yours,

Paul E. Russell/dler

Paul E. Russell

Attachment

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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JUN 24 1997

PA. PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Eric Epstein's Interrogatories, Questions 2 through 8 and 17 and 18 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
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Tanya A. McCloskey, Esquire
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Washington, DC 20005

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305 N. Front Street
Suite 403
Harrisburg, PA 17101-1236

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

Dated this 24th day of June, 1997.



Dorene L. Wehr



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

MEM

June 24, 1997

VIA FEDERAL EXPRESS

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

RECEIVED
JUN 24 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 letter, please call.

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

DOCUMENT
FOI DEB

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

JUN 24 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Environmentalists' Interrogatories Set 1, Question 45 and Set 3, Questions 145, 151, 155, 156, 173, 174, 180, 189 and 190 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

INDEXED

JUL 07 1997

DOCUMENT
FOLDER

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Greensburg, PA 15601-1689

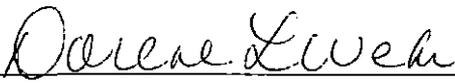
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1 Columbia Place
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Dated this 24th day of June, 1997.



Dorene L. Wehr

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MICHAEL A. DOCTROW
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DAVID E. LEHMAN
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ROBERT A. MILLS
STEPHEN A. MOORE
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JOHN S. OYLER
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DANA STEVENS SCADUTO
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DAVID M. WATTS, JR.
STEVEN J. WEINGARTEN
NEAL S. WEST
NORMAN I. WHITE
LAWRENCE R. WIEDER
WILLIAM M. YOUNG, JR.

ORIGINAL

June 25, 1997

VIA HAND DELIVERY

James J. McNulty, Prothonotary
Pennsylvania Public Utility Commission
Room B-20, North Office Building
Harrisburg, PA 17120

Re: **Pennsylvania Public Utility Commission v. Pennsylvania Power & Light Company; Docket No. R-00973954**

Dear Prothonotary McNulty:

Enclosed for filing please find the original and three (3) copies of the Petition of Pennsylvania Retailers' Association to Intervene in the above-referenced proceeding. As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and kindly return it for our filing purposes.

Respectfully submitted,

MCNEES, WALLACE & NURICK

By


Robert A. Mills

Counsel to the Pennsylvania Retailers' Association

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97 JUN 25 PM 2:31
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RAM/clc
Enclosures
c: Honorable George M. Kashi (via hand delivery)
Certificate of Service

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ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PP&L INDUSTRIAL CUSTOMER ALLIANCE :

v. :

PENNSYLVANIA POWER & LIGHT COMPANY :

Docket No. R-00973954

**PETITION TO INTERVENE OUT OF TIME OF THE
PENNSYLVANIA RETAILERS' ASSOCIATION**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 52 Pa. Code §§ 5.71-5.74 and 52 Pa. Code § 5.61, the Pennsylvania Retailers' Association ("PRA") files this Petition to Intervene out of time in response to the Restructuring Plan filed by the Pennsylvania Power & Light Company ("PP&L") pursuant to Section 2806(d) of the Electricity Generation Competition and Customer Choice Act, 66 Pa.C.S. § 2801, et seq ("Chapter 28" or "Act"). In support thereof, PRA states as follows:

1. Petitioner is the PRA. PRA is a statewide trade association established in 1932 representing retailers throughout the Commonwealth of Pennsylvania. PRA represents both small, independently owned retail stores and large retail chains. PRA's membership

EXHIBITED

JUN 27 1997

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PROTHONOTARY'S OFFICE

accounts for over 1500 store locations within the Commonwealth of Pennsylvania. PRA represents the interests of its members before the Pennsylvania General Assembly, the Governor's Office and various administrative agencies.

2. The name and address of PRA's attorney is:

Robert A. Mills
McNEES, WALLACE & NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
(717) 237-5216

All correspondence in this proceeding from the Commission should be directed to the attention of Brian A. Rider, President of PRA at the following address:

Brian A. Rider, President
Pennsylvania Retailers' Association
224 Pine Street
Harrisburg, PA 17101-1325
(717) 233-7976

3. The respondent utility is:

Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, PA 18101-1179

4. On April 1, 1997, PP&L filed with the Commission its Application of Pennsylvania Power & Light Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code ("Application" or "Restructuring Plan").

5. PP&L requests, inter alia, through its Application: (1) the recovery from ratepayers of 100% of \$4.6 billion in claimed transition or stranded costs; (2) the approval

and imposition of unbundled rates, which include a Competitive Transition Charge ("CTC") designed to recover \$4.2 billion of its claimed stranded and transition costs from retail customers; (3) the implementation of procedures to ensure direct access; (4) the implementation of a consumer education program; and (5) the implementation of an initial plan to meet universal service and energy conservation obligations.

6. In support of its Application, and the relief requested therein, PP&L has filed and served supporting testimony that purports to validate its claim for \$4.6 billion in transition and stranded costs as well as the reasonableness of allowing PP&L to recover \$4.2 billion of these claimed stranded costs from ratepayers. Further, PP&L avers that its unbundling and stranded costs recovery proposals are rate cap compliant (with Section 2804(4) of the Act) and that the balance of this plan is otherwise compliant with pertinent provisions of Chapter 28.

7. PRA is concerned with a myriad of issues arising from PP&L's Application. PRA reserves the right to raise and address various issues during the course of this proceeding; however, issues of immediate and primary concern to PRA include:

- **Transition or Stranded Costs:** PRA questions the reasonableness of PP&L's transition and stranded cost claim and the methodologies and assumptions utilized to estimate that claim. Moreover, PRA believes that PP&L's request for relief violates the Act insofar as it seeks a disproportionate recovery of claimed transition and stranded costs from retail customers. Only a just and reasonable level of quantified stranded or transition costs may be recovered from ratepayers.

- **Mitigation:** PRA questions whether PP&L has effectively mitigated stranded costs, and provided a plan for mitigation in the future, in order to reasonably reduce the cost to be recovered through its CTC.
- **Unbundling/Allocation:** PRA questions whether PP&L's proposed unbundling comports with the requirements of the Act and specifically the rate cap and the prohibitions against inter- and intra-class cost shifting.
- **Phase-In:** PRA seeks to assure that phase-in implementation does not cause any of its members to incur competitive disadvantages due to one customer participating in the phase-in who competes directly with a customer who is prevented from participating.

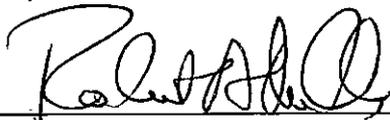
8. PRA realizes that substantial events have already occurred in this proceeding.

PRA accepts any schedules or rulings made to this point by the Administrative Law Judge. Furthermore, PRA asserts that its participation in this proceeding will not burden the other parties of the record.

WHEREFORE, the Pennsylvania Retailers' Association respectfully requests that the Commission grant this Petition to Intervene with full party status.

Respectfully submitted,

McNEES, WALLACE & NURICK

By  _____

Robert A. Mills
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
(717) 237-5216

Counsel to the Pennsylvania Retailers' Association

Dated: June 25, 1997

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing Petition to Intervene of the Pennsylvania Retailers' Association upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

Joan O. Brandeis, Esquire
Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
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Robert Longwell, Esquire
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CERTIFICATE OF SERVICE

Page 2

Docket No. R-00973954

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CERTIFICATE OF SERVICE

Page 3

Docket No. R-00973954

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901 15th Street, NW
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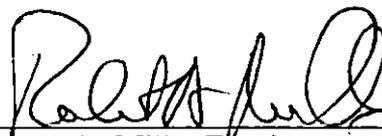
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FA.P.U.C.
PROTHONOTARY'S OFFICE



Robert A. Mills, Esquire

Dated this 25th day of June, 1997, at Harrisburg, Pennsylvania.

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1200 17TH STREET, N.W.
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JUN 25 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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TELECOPIER
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June 25, 1997

DOUGLAS F. JOHN
EDWARD W. HENGERER
KEVIN M. SWEENEY
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SHELBY L. PROVENCHER

Via Overnight Mail

Office of Prothonotary
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MEM

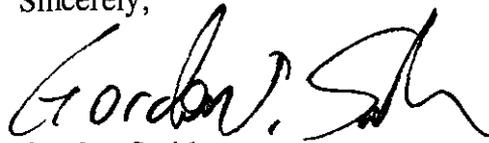
**RE: Petition for Pennsylvania Power & Light Company's Restructuring Plan,
Docket No. R-00973954**

Dear Sirs:

I've included for filing an original, 5 copies and 2 diskette copies of the Petition for Leave to Intervene and Participate of Electric Clearinghouse, Inc. in the above-referenced docket. Please return two stamped copies in the attached envelope for our records.

Thank you for your attention to this matter.

Sincerely,



Gordon Smith

Counsel For
Electric Clearinghouse, Inc.

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JUN 25 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

Application of Pennsylvania Power & Light) Docket No.
Company for Approval of its Restructuring) R-00973954
Plan)

PETITION FOR LEAVE TO INTERVENE AND PARTICIPATE OF
ELECTRIC CLEARINGHOUSE, INC.

This Petition for Leave to Intervene and Participate in the above-referenced proceeding is filed by Electric Clearinghouse, Inc. (ECI) pursuant to the Public Utility Commission's (Commission) Rules of Procedure and Practice, 52 Pa. Code § 5.71, *et. seq.*, and the Prehearing Order. ECI requests that this Motion be granted for the reasons set forth below:

I.

Communications and correspondence concerning this Motion should be directed to:

Gordon J. Smith, Esq.
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3006
Telephone: (202) 429-8814
Facsimile: (202) 429-8805

David Cruthirds
ELECTRIC CLEARINGHOUSE, INC.
1000 Louisiana
Suite 5800
Houston, TX 77002-5050
Telephone: (713) 507-3761

II.

ECI is headquartered in Houston, Texas and is a subsidiary of NGC Corporation, which has subsidiaries involved in the gathering, processing and marketing of natural gas, natural gas liquids and crude oil. ECI is a marketer for electric power and provides value-added services for utility and non-utility generators. ECI also offers various risk management services to its customers, including options, swaps and other financial derivatives. ECI expects to contract for transmission service in connection with its business as a marketer, or buy from or sell to others that are receiving transmission service. ECI intends to serve

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JUL 07 1997

customers on Pennsylvania Power & Light Company's (PP&L) distribution system and has significant interest in the Pennsylvania electricity market in general.

III.

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

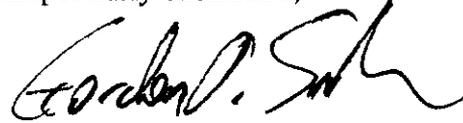
IV.

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

V.

WHEREFORE, ECI requests that the Commission grant this Motion and that ECI be made a party to this proceeding for all purposes.

Respectfully submitted,



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

Counsel for Electric Clearinghouse, Inc.

I hereby certify that I have this day served a true copy of the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Washington D.C.: June 25, 1997



Pennsylvania Power & Light Company

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

MEM

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

FAX: 610/774-6726

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June 25, 1997

JUN 25 1997

VIA FEDERAL EXPRESS

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

**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 letter, please call.

Very truly yours,

Paul E. Russell /dlw

Paul E. Russell

Attachment

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 25 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Environmentalists' Interrogatories Set 1, Questions 36 and 50 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated this 25th day of June, 1997.



Dorene L. Wehr



Pennsylvania Power & Light Company

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MEM

June 25, 1997

VIA FEDERAL EXPRESS

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

RECEIVED

JUN 25 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 letter, please call.

Very truly yours,

Paul E. Russell

Attachment

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FOLDER

RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 25 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

CERTIFICATION OF SERVICE

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 VIII, Questions 1 and 2, Set XIII, Question 1 and Set XIV, Question 1 upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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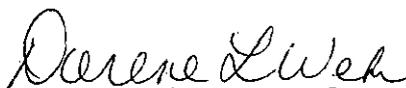
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