

ORIGINAL



Pennsylvania Power & Light Company

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

RECEIVED

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

FAX: 610/774-6726

JUN 12 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

June 12, 1997

VIA FEDERAL EXPRESS

James J. McNulty, Esquire
Prothonotary
Pennsylvania Public Utility Commission
North and Commonwealth Streets
Harrisburg, Pennsylvania 17105

KJR

**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 the Environmentalists' 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/dlw

Paul E. Russell

DOCUMENT
FOLDER

Enclosures

cc: Certificate of Service

ORIGINAL
RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION JUN 12 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 37-39 and 51-55 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

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

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

DOCKETED
JUN 17 1997

**DOCUMENT
FOLDER**

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

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

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

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

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

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

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

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

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18640

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

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street, Suite 526
Arlington, VA 22203-1837

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

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

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

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

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

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

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

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

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

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

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

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

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

Terrance J. Fitzpatrick, Esquire
Ryan, Russell, Ogden & Seltzer, LLP
800 North Third Street
Suite 101
Harrisburg, PA 17102-2025

John Munsch
Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Paul E. Nordstrom
Verner & Lipfert, Berhard, McPherson & Hand
901 15th Street, N.W., Suite 700
Washington, DC 20005

Joseph A. Dworetzky, Esquire
Hangley, Aronchick, Segal and Pudlin
One Logan Square
12th Floor
Philadelphia, Pennsylvania 19103-6933

Linda C. Smith, Esquire
Dilworth, Paxson, Kalish and Kauffman LLP
305 N. Front Street
Suite 403
Harrisburg, Pennsylvania 17101-1236

Dated this 12th 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

FAX: 610/774-6726

RECEIVED

JUN 12 1997

June 12, 1997

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

KJR

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

Dear Prothonotary McNulty:

PPLICA

Enclosed are ~~Pennsylvania Power & Light Company's~~ Pennsylvania Power & Light Company's (PP&L) answers to the Office of Small Business Advocate'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/dlw

Paul E. Russell

Enclosures

cc: Certificate of Service

**DOCUMENT
FOLDER**

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

JUN 12 1997

Pennsylvania Power & Light Company :
Restructuring Plan Filing :

Docket No. R-00973954

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

CERTIFICATION OF SERVICE

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

Federal Express

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

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

DOCKETED
JUN 17 1997

**DOCUMENT
FOLDER**

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

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

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

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

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

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

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

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

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18640

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

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

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

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

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

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

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

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

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

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

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

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

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

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

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

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

Terrance J. Fitzpatrick, Esquire
Ryan, Russell, Ogden & Seltzer, LLP
800 North Third Street
Suite 101
Harrisburg, PA 17102-2025

John Munsch
Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Paul E. Nordstrom
Verner & Lipfert, Berhard, McPherson & Hand
901 15th Street, N.W., Suite 700
Washington, DC 20005

Joseph A. Dworetzky, Esquire
Hangley, Aronchick, Segal and Pudlin
One Logan Square
12th Floor
Philadelphia, Pennsylvania 19103-6933

Linda C. Smith, Esquire
Dilworth, Paxson, Kalish and Kauffman LLP
305 N. Front Street
Suite 403
Harrisburg, Pennsylvania 17101-1236

Dated this 12th day of June, 1997.



Dorene L. Wehr

VOUGH & ASSOCIATES
ATTORNEYS AT LAW

MICHAEL T. VOUGH
JEFFREY J. TOKACH
GREGORY S. SKIBITSKY

GREATER PITTSTON PROFESSIONAL CENTER
126 SOUTH MAIN STREET
PITTSTON, PENNSYLVANIA 18640-1793

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

FAX: (717) 654-6509

000210

97 JUN 13 PM 1:45

RECEIVED
PROTHONOTARY'S OFFICE

June 13, 1997

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

KJR

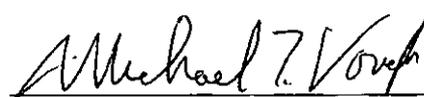
RE: PP&L's Restructuring Plan Filing Docket No. R-00973954

Dear Sir/Madam:

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

Very truly yours,

VOUGH & ASSOCIATES



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

MTV/gss

DOCUMENT
FOLDER

20

000215
COMMONWEALTH OF PENNSYLVANIA 97 JUN 13 PM 1:46
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: R-00973954

RECEIVED
PROTHONOTARY'S OFFICE

PENNSYLVANIA POWER AND LIGHT
APPLICATION FOR APPROVAL OF RESTRUCTURING PLAN

SECOND SET OF INTERROGATORIES SUBMITTED
TO PENNSYLVANIA POWER AND LIGHT BY
THE COMMISSION ON ECONOMIC OPPORTUNITY
OF LUZERNE COUNTY

1. Using 1996 figures, what are the total write-offs attributable to PP&L households at or below 150% of the federal poverty guidelines? If these numbers are not specifically available, please provide the best estimates utilized by PP&L and copies of all supporting documents - including but not limited to - a detailed description of the methodology used to make such estimates, references to all data sources, statistical and/or mathematical formulas, and/or other data manipulations utilized to derive such estimates.
2. With regard to Question one (1), if the 1990 U.S. Census data is used as a source for making such estimates, please provide specific reference as to the location in the 1990 U.S. census - including but not limited to - tape number, volume and page number, table and line numbers, etc., for all such sources, as well as copies of all work papers and/or notes used to derive such estimates.
3. If PP&L is not able to provide such an estimate, please provide specific reasons for its failure to be able to do so.
4. Using 1996 figures, what are the total amount of collection expenses attributable to PP&L households at or below 150% of the federal poverty guidelines? If these numbers are not specifically available, please provide the best estimates utilized by PP&L and copies of all supporting documents - including but not limited to - a detailed description of the methodology used to make such estimates, references to all data sources, statistical and/or mathematical formulas, and/or other data manipulations utilized to derive such estimates.
5. With regard to Question four (4), if the 1990 U.S. Census data is used as a source for making such estimates, please provide specific reference as to the location in the 1990 U.S. census - including but not limited to - tape number, volume and page number, table and line

JACKETED
JUN 16 1997

DOCUMENT
FOLDER

numbers, etc., for all such sources, as well as copies of all work papers and/or notes used to derive such estimates.

6. If PP&L is not able to provide such an estimate, please provide specific reasons for its failure to be able to do so.

7. Using 1996 figures, what is the average cost of handling a customer's complaint from inception to formal hearing? If these numbers are not specifically available, please provide the best estimates utilized by PP&L and copies of all supporting documents - including but not limited to - a detailed description of the methodology used to make such estimates, references to all data sources, statistical and/or mathematical formulas, and/or other data manipulations utilized to derive such estimates.

8. With regard to Question seven (7), if the 1990 U.S. Census data is used as a source for making such estimates, please provide specific reference as to the location in the 1990 U.S. census - including but not limited to - tape number, volume and page number, table and line numbers, etc., for all such sources, as well as copies of all work papers and/or notes used to derive such estimates.

9. If PP&L is not able to provide such an estimate, please provide specific reasons for its failure to be able to do so.

10. During 1996, what was the total number of customer complaints? If these numbers are not specifically available, please provide the best estimates utilized by PP&L and copies of all supporting documents - including but not limited to - a detailed description of the methodology used to make such estimates, references to all data sources, statistical and/or mathematical formulas, and/or other data manipulations utilized to derive such estimates.

11. With regard to Question ten (10), if the 1990 U.S. Census data is used as a source for making such estimates, please provide specific reference as to the location in the 1990 U.S. census - including but not limited to - tape number, volume and page number, table and line numbers, etc., for all such sources, as well as copies of all work papers and/or notes used to derive such estimates.

12. If PP&L is not able to provide such an estimate, please provide specific reasons for its failure to be able to do so.

13. During 1996, what was the total number of customer complaints from households at or below 150% of the federal poverty guidelines? If these numbers are not specifically available, please provide the best estimates utilized by PP&L and copies of all supporting documents - including but not limited to - a detailed description of the methodology used to make such estimates, references to all data sources, statistical and/or mathematical formulas, and/or other data manipulations utilized to derive such estimates.

14. With regard to Question thirteen (13), if the 1990 U.S. Census data is used as a

source for making such estimates, please provide specific reference as to the location in the 1990 U.S. census - including but not limited to - tape number, volume and page number, table and line numbers, etc., for all such sources, as well as copies of all work papers and/or notes used to derive such estimates.

15. If PP&L is not able to provide such an estimate, please provide specific reasons for its failure to be able to do so.

16. In response to Question thirty-six (36) of the First Set of Interrogatories submitted by the Commission On Economic Opportunity, PP&L representative T.R. Dahl responded that, "the information provided in the response...comes from the 1990 U.S. Census tapes." What is the specific location in the 1990 U.S. Census, i.e. tape number, volume and page number, table and line numbers, etc., for all statistics to which T.R. Dahl refers?

17. With regard to Question sixteen (16) above, if T.R. Dahl is not making specific references to statistics in the 1990 U.S. Census Tapes, describe in detail, with reference to specific statistics and the location of each to which T.R. Dahl refers.

18. With regard to Question sixteen (16) above, if the statistics to which T.R. Dahl refers are derived from statistics contained in the 1990 U.S. Census, please describe in detail the methodology utilized by T.R. Dahl or any other PP&L representative with reference to the responses made to Questions 30 through 35 of the First Set of Interrogatories submitted by the Commission On Economic Opportunity, along with a detailed description of all mathematical formulas, statistical, and/or other data manipulations or other means used to derive such responses. Additionally, please provide copies of all work papers and/or notes used to develop PP&L's responses to those aforementioned questions

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE: R-00973954

**PENNSYLVANIA POWER AND LIGHT
APPLICATION FOR APPROVAL OF RESTRUCTURING PLAN**

**THE COMMISSION ON ECONOMIC OPPORTUNITY'S
CERTIFICATE OF SERVICE**

I, Michael T. Vough, Esquire, hereby certify that on this day, June 13, 1997, I served a true and exact copy of the Commission on Economic Opportunity's Second Set of Interrogatories filed by the Commission on Economic Oppotunity upon the active participants to this action listed below by providing the same via postage-paid, U.S. Mail to their respective addresses:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Eric J. Epstein
2308 Brandywine Drive
Harrisburg, PA 17110

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

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

100 North Tenth Street
Harrisburg, PA 17101

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

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

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

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

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

2301 Market Street
Philadelphia, PA 19101-8699

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

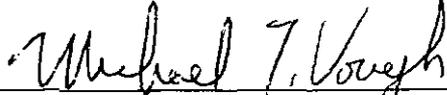
John L. Munsch, Esquire
Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601

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

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

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

DATED THIS DAY, JUNE 13, 1997:


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



PRESTON GATES ELLIS &
ROUVELAS MEEDS LLP
ATTORNEYS

ORIGINAL

June 13, 1997

VIA FEDERAL EXPRESS

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

RECEIVED

JUN 13 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Dear Mr. McNulty:

KJR

Enclosed for filing in the above-referenced proceeding are an original and three copies of Pennsylvania Power & Light Company's Objections to Eric Joseph Epstein's Interrogatories. Also enclosed is an additional copy of this cover letter which we request that you date stamp as of June 13, 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 Federal Express on Administrative Law Judge George M. Kashi and Mr. Eric Epstein 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

DOCUMENT
FOLDED

50

RECEIVED

JUN 13 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

ORIGINAL

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 OF
ERIC EPSTEIN -- SET 1**

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 Eric Epstein's First Set of Interrogatories. In support thereof, PP&L avers as follows:

1. By letter dated June 3, 1997, Eric Epstein served his First Set of Interrogatories directed to PP&L. The Interrogatories contain 19 questions, six of which have multiple subparts.

2. As explained in greater detail below, the Company generally objects to the focus of Mr. Epstein's First Set of Interrogatories. All of Mr. Epstein's interrogatories address the nuclear decommissioning of PP&L's Susquehanna Steam Electric Station ("SSES"). This case is not about the decommissioning of SSES, and Mr. Epstein's interrogatories plainly exceed the scope of this proceeding. The Company's claims regarding the decommissioning of SSES in this proceeding are based entirely on the Commission's recent findings in PP&L's last base rate

DOCKETED
JUN 17 1997

DOCUMENT
FOLDER

case (Docket No. R-00943271). The Commission's findings in that case have not been superseded and Mr. Epstein's attempt to relitigate those issues is completely inappropriate. Where PP&L has received well over 600 interrogatories and requests for documents, the Company believes that it would be unreasonably burdensome to respond to Mr. Epstein's irrelevant and inappropriate interrogatories.

3. Interrogatory Question 9 states as follows:

Is the Company aware that if the Susquehanna Steam Electric Station operated for 40 years, it will be retired at the same time as the majority of nuclear reactors in America?

b) In so much that simultaneous decontamination and decommissioning projects at numerous commercial nuclear power plants would make enormous demands on LLRW and HLRW isolation, has the Company planned a fall back scenario in the event radioactive waste disposal space is unavailable?

4. PP&L objects to Question 9 because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. Question 9 is purely hypothetical and asks PP&L to speculate as to future events and circumstances that have no factual basis.

5. Interrogatory Question 10 states as follows:

The current decommissioning plan assumes the SAFSTOR method. What are the financial implications if DECON or ENTOMB are the realized methods of nuclear decontamination and decommissioning?

6. PP&L objects to Interrogatory Question 10 because it seeks information that is beyond the scope of this proceeding, and is irrelevant and not reasonably calculated to lead to the discovery of relevant evidence. The specific reasons for the Company's objections are set forth in paragraph 2 above.

7. Interrogatory Question 11 states as follows:

As of June 1, 1997, how many commercial nuclear power plants over 100 megawatts have been decontaminated and decommissioned in the United States of America?

8. PP&L objects to Question 11 because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. This interrogatory seeks information related to nuclear plants owned and/or operated by entities other than PP&L. These facilities simply are not at issue in this case. Question 11 therefore is completely irrelevant and should be stricken.

9. Interrogatory Question 12 states as follows:

What technological initiatives are PP&L pursuing to ensure decommissioning technology is available when the SESS is no longer operational?

10. The Company objects to Question 12 because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. As explained in paragraph 2, this case is not about the decommissioning of SSES. Mr. Epstein's request for information relating to potential future decommissioning technologies is completely irrelevant and should be stricken.

11. Interrogatory Question 13 states as follows:

How much is the Allegheny Electric Cooperative (AEC) saving for decommissioning?

b) Is the Company aware that AEC is estimating decommissioning costs at \$37.8 million or half of its 10% share?

c) When Laurence V. Bladen, Director of Finance and Administrative services for AEC, was asked what method of decommissioning AEC was planning for he could not identify the option (March 30, 1995.) Upon an additional request on May 12, 1995, Mr. Bladen claimed the mode was Greenfield. He was informed that this is not a decommissioning option, Mr. Bladen responded, "I'll have to do some further checking." On June 3, 1995, Mr. Bladen was asked the same question and responded: "I keep asking the engineers. I know its not ENTOMBMENT."

Have you determined what method your junior partner is employing when making decommissioning estimates for SSES?

d) Are you aware the AEC decommissioning fund is currently underfunded by 50%?

12. PP&L objects to Question 13 because it is irrelevant and not reasonably calculated to lead to the discovery of relevant evidence. Specifically, Question 13 asks for information relating to Allegheny Electric Cooperative's ("AEC") decommissioning activities.

AEC is not the applicant in this case, and its decommissioning practices and plans are not at issue. Question 13 is totally irrelevant and should be stricken.

13. Interrogatory Question 14 states as follows:

Does PP&L coordinate decommissioning funding, planning or strategy with AEC?

14. PP&L objects to Question 14 for the reasons set forth in paragraph 12 above.

15. Interrogatory Question 15 states as follows:

Is the AEC apprised that the decommissioning funding “target” includes only radiological decommissioning and that their funding “target” is not an end goal?

16. The Company objects to Question 15 for the reasons set forth in paragraph 12 above.

17. Interrogatory Question 16 states as follows:

What impact and what contingencies have PP&L taken in the event AEC is unable to meet its decommissioning funding requirements?

18. PP&L objects to Question 16 for the reasons set forth in paragraph 12 above.

19. Interrogatory Question 19 states as follows:

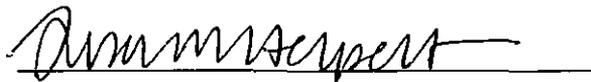
Mr. Douglass A. Krall stated during the 1995 Base Rate Proceeding, "There would be exposure that a customer who came on the last day of operation of the plant would get very little service from the plant and end up paying the whole cost of decommissioning." (Page 1925, Lines 16-24.) He was then asked, "But you would not be adverse to assessing future customers who got no electrical from a plant decommissioning costs? - "It doesn't seem to me to be an equitable situation." (page 1927, Lines 9-13.)

Is it the Company's position that regardless of the years, months or days of service provided to customer, all rate payers are equally exposed to nuclear decommissioning costs?

20. PP&L objects to Question 19 because it is beyond the proper scope of discovery, is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. Specifically, Question 19 focuses on testimony and evidence submitted in PP&L's last base rate case. As explained in paragraph 2 above, Mr. Epstein's attempts to relitigate issues recently decided by the Commission in the base rate case are completely inappropriate. Question 19 therefore should be stricken.

THEREFORE, for the reasons set forth above, Pennsylvania Power & Light Company respectfully requests that the Commission grant its objections and strike Set 1 Interrogatory Questions 9-16 and 19 of Eric Epstein.

Respectfully submitted,



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

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

Counsel For Pennsylvania Power & Light Company

Date: June 13, 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 Eric Joseph Epstein's Interrogatories upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

George M. Kashi
Administrative Law Judge
North Office Building
North St. and Commonwealth Ave.
Harrisburg, PA 17105-3265

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

U.S. Mail

Johnnie Simms, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Third Floor, Pitnick Building

901 North Seventh Street - Rear
Harrisburg, PA 17105-3265

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

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

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

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

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

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

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

Alan Kohler, Esquire
305 North Front Street

Harrisburg, PA 17101

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

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18640

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

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street, Suite 526
Arlington, VA 22203-1837

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

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

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

Robert F. Young
Deputy General Counsel
212 Locust Street
P. O. Box 1266

Harrisburg, PA 17108-1266

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

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

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

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

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

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

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

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

Terrance J. Fitzpatrick, Esquire
Ryan, Russell, Ogden & Seltzer, LLP
800 North Third Street
Suite 101
Harrisburg, PA 17102-2025

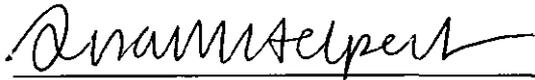
John Munsch
Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Paul E. Nordstrom
Verner & Lipfert, Berhard, McPherson & Hand
901 15th Street, N.W., Suite 700
Washington, DC 20005

Joseph A. Dworetzky, Esquire
Hangley, Aronchick, Segal and Pudlin
One Logan Square
12th Floor
Philadelphia, PA 19103-6933

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

Dated this 13th day of June, 1997.



Lisa M. Helpert



Pennsylvania Power & Light Company

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

ORIGINAL

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

FAX: 610/774-6726

June 13, 1997

VIA FEDERAL EXPRESS

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

RECEIVED
JUN 13 1997
PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

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

Dear Mr. McNulty:

KJR

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/dlu

Paul E. Russell

Attachment

DOCUMENT
KJR

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Power & Light Company :
Restructuring Plan Filing :

Docket No. R-00973954

CERTIFICATION OF SERVICE

RECEIVED

JUN 13 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the Environmentalists' Interrogatories, Set 1, Questions 5, 12, 13 and 30-35 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

DUCKETED

JUN 17 1997

DOCUMENT
FOLDER

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

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

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

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

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

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

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

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

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18640

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

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street, Suite 526
Arlington, VA 22203-1837

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

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

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

Eric Epstein
2308 Brandywine Drive
Harrisburg PA 17710

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

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

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

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

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

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

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

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

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

Terrance J. Fitzpatrick, Esquire
Ryan, Russell, Ogden & Seltzer, LLP
800 North Third Street
Suite 101
Harrisburg, PA 17102-2025

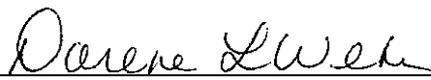
John Munsch
Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Paul E. Nordstrom
Verner & Lipfert, Berhard, McPherson & Hand
901 15th Street, N.W., Suite 700
Washington, DC 20005

Joseph A. Dworetzky, Esquire
Hangley, Aronchick, Segal and Pudlin
One Logan Square
12th Floor
Philadelphia, PA 19103-6933

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

Dated this 13th day of June, 1997.



Dorene L. Wehr



PRESTON GATES ELLIS &
ROUVELAS MEEDS LLP
ATTORNEYS

ORIGINAL

June 16, 1997

DONALD A. KAPLAN
DIRECT DIAL (202) 662-8466
DONK@PRESTONGATES.COM

VIA 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**

KJR

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 Enron Capital and Trade Resources' Interrogatories, Set 3, and Pennsylvania Power & Light Company's Objections to Environmentalists' Data Requests, Set 4. Also enclosed is an additional copy of this cover letter which we request that you date stamp as of June 13, 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 Federal Express on Administrative Law Judge George M. Kashi, Counsel for Enron Capital and Trade Resources, and Counsel for the Environmentalists, and via U.S. mail on all other parties of record.

Very truly yours,

Donald A. Kaplan

Enclosures

cc: The Honorable George M. Kashi
Certificate of Service

RECEIVED

DOCUMENT
FOLDER

JUN 16 1997
PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

101

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

RE: RESTRUCTURING PLAN OF :
PENNSYLVANIA POWER & :
LIGHT COMPANY :

Docket No. R-00973954

RECEIVED

JUN 16 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

**OBJECTIONS OF
PENNSYLVANIA POWER & LIGHT COMPANY
TO ENRON CAPITAL AND TRADE RESOURCES'
INTERROGATORIES -- SET 3**

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 Enron Capital and Trade Resources' ("Enron") Third Set of Interrogatories. In support thereof, PP&L avers as follows:

1. By letter dated June 6, 1997, Enron served its third set of interrogatories to PP&L. The interrogatories contain 19 questions, nine of which have multiple subparts.

2. Interrogatory No. 3 states as follows:

Identify and explain all factors considered by PP&L in reaching a decision not to structurally separate its Generation Supply Group from the electric distribution company. If cost was a factor considered by PP&L, identify the level of cost and produce all documents identifying the level of cost projected by PP&L to structurally separate its Generation Supply Group from the electric distribution company.

3. PP&L objects to Interrogatory No. 3 because it seeks information protected by the attorney-client privilege. The Company also objects to Interrogatory No. 3

DOCKETED
JUN 18 1997

DOCUMENT
FOLDER

because the information sought is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. The Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. §§2801 et seq., does not require PP&L to “structurally separate” generation from transmission and distribution. Interrogatory No. 3 therefore is irrelevant.

4. Interrogatory No. 4 states as follows:

Please list all long-term contracts entered into by PP&L with its customers on or after July 1, 1996 which bind the customer to continue to purchase generation supply from PP&L after January 1, 1999. For each contract identify the following:

- (a) The customer of record subject to the contract;
- (b) The date the contract was entered into;
- (c) The term duration that the customer is bound to continue to purchase generation and supply from PP&L; and
- (d) The amount of load subject to the contract.

5. PP&L objects to Interrogatory No. 4 because it seeks proprietary and confidential customer information. Generally, those PP&L customers who have entered into long-term contracts are large industrial or commercial operations that face significant competition in their various product and service markets. Information regarding customer identities, the duration of supply contracts and the amount of load subject to such contracts is competitively sensitive. In order to provide electric service to its customers, PP&L necessarily acquires and maintains proprietary information regarding, inter alia, business plants, operations and electric usage. The Company maintains such information in trust for its customers and, in its

view, has a strict obligation to protect such information from disclosure unless customer consent is given. Although the Enron and PP&L have entered into a protective agreement pending the entry of a Protective Order in this proceeding, customer proprietary and competitively sensitive information is beyond the scope of that agreement and the proposed Protective Order.¹

6. Interrogatory No. 5 states as follows:

For the contracts identified in Question No. 4, identify and explain whether PP&L's supply obligations under the contracts will be fulfilled by the Delivery Group or the Generation Supply Group after January 1, 1999. Please provide an answer to this question for each of the following scenarios:

- (a) None of the customer's load qualifies to participate in the first phase of direct access;
- (b) All of the customer's load qualifies to participate in the first phase of direct access; and
- (c) Only a portion of the customer's load qualifies to participate in direct access.

7. PP&L objects to Interrogatory No. 5 for the reasons set forth in paragraph 5 above.

¹See Motion for Entry Of Protective Order, filed by PP&L in this docket on May 20, 1997.

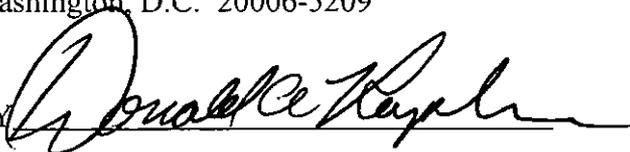
THEREFORE, for the reasons set forth above, PP&L's objections to Enron Interrogatory Nos. 3 through 5 should be sustained and the aforementioned interrogatories stricken.

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

BY

A handwritten signature in black ink, appearing to read "Donald A. Kaplan", written over a horizontal line.

Counsel For Pennsylvania Power & Light Company

Date: June 16, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**ORIGINAL
RECEIVED**

RE: RESTRUCTURING PLAN OF :
PENNSYLVANIA POWER & :
LIGHT COMPANY :

Docket No. R-00973954

JUN 16 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

**OBJECTIONS OF
PENNSYLVANIA POWER & LIGHT COMPANY
TO ENVIRONMENTALISTS' DATA REQUESTS -- SET 4**

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 Environmentalists' Data Requests -- Set 4. In support thereof, PP&L avers as follows:

1. On June 9, 1997, the Environmentalists served their fourth set of Data Requests to PP&L. The Data Requests are numbered 191 through 232, and many include multiple subparts.

2. Data Request No. 196 states as follows:

Please cite all legislation, regulations, and/or court-made law relied upon in support of Mr. Kalt's statement that a regulatory compact exists.

3. PP&L objects to Data Request No. 196 because it seeks information that lies beyond the proper scope of discovery. The Commission's regulations at 52 Pa. Code §5.323

DOCKETED
JUN 18 1997

DOCUMENT
FOLDER

limit the scope of permissible discovery by imposing the following prohibition on the disclosure of trial preparation material:

The discovery may not include disclosure of the mental impressions of a participant's attorney or his conclusions, opinions, memoranda, notes, summaries, legal research or legal theories.

4. PP&L's witness, Dr. Joseph P. Kalt, whose testimony is referenced in Data Request No. 196, has not offered a legal opinion regarding the existence of a "regulatory compact." Dr. Kalt is not a lawyer and, to the extent the Environmentalists' Data Request seeks to elicit a legal opinion from Dr. Kalt, it is improper. To the extent Data Request No. 196 seeks to elicit the "conclusion, opinions. . . legal research or legal theories" of PP&L's legal counsel, it is violative of the prohibition imposed by 52 Pa. Code §5.323, as quoted above.

5. Data Request No. 211 states as follows:

Please indicate whether Dr. Jones conducted scenario analyses on the future market price for energy.

- a. If so, please identify the scenario(s) analyzed, fully justifying why the particular combination of variables was chosen.
- b. Please supply the results of the high case (or equivalent) and low case (or equivalent) if different from scenarios described in a, above.
- c. If no scenario analysis was conducted, please fully explain.

6. PP&L objects to Data Request No. 211 because it is vague and unclear.

Specifically, the term "scenario analysis" is not defined, nor is it an accepted term in the electric industry. Data Request No. 211, therefore, is vague and cannot be answered as stated. If Data

Request No. 211 is restated or clarified, PP&L reserves the right to object to the restated request, if necessary.

7. Data Request No. 212 states as follows:

Please indicate whether Dr. Jones conducted scenario analyses on the future market price for capacity.

- a. If so, please identify the scenario(s) analyzed, fully justifying why the particular combination of variables was chosen.
- b. Please supply the results of the high case (or equivalent) and low case (or equivalent) if different from scenarios described for “a”, just above.
- c. If no scenario analysis was conducted, please fully explain.

8. The Company objects to Data Request No. 212 for the reasons stated in paragraph 6 above. If Data Request No. 212 is restated or clarified, PP&L reserves the right to object to the restated request, if necessary.

9. Data Request No. 223(a) states as follows:

With respect to the process for establishing a customized rate for new and returning customers:

- a. Please explain the process in as much detail as the Company has explored it.

10. PP&L objects to Data Request No. 223(a) because it is vague, unreasonably burdensome, irrelevant and not reasonably calculated to lead to the discovery of relevant evidence. It is unclear what information is sought by the phrase “process for establishing a customized rate.” The Company already has submitted extensive evidence in this

case regarding its proposed "customized" rate. Specifically, the calculation of the "customized" rate is described in the Direct Testimony of Douglas A. Krall, and the pro-forma impact of the proposed unbundled rate designs is described in the Direct Testimony of Oliver G. Kasper. To the extent that Data Request No. 223 (a) seeks information relating to the entire development process of the proposed rate, it is unduly burdensome and would require an unreasonable investigation.

11. Data Request No. 232(b) states as follows:

Replacement of existing information system.

b. Please identify and then describe each new billing option enabled by the Company's development of a new billing system.

12. The Company objects to Data Request No. 232(b) because it is irrelevant and is not reasonably calculated to lead to the discovery of relevant evidence. As explained in the Direct Testimony of Bernard J. Bujnowski, the Company is proposing a number of changes to its customer metering, billing and collection systems and procedures to accommodate the transition to full retail competition. The new billing options that may be possible with the proposed billing system are not at issue in this proceeding and are beyond the proper scope of discovery. Data Request No. 232(b), therefore, is irrelevant and should be stricken.

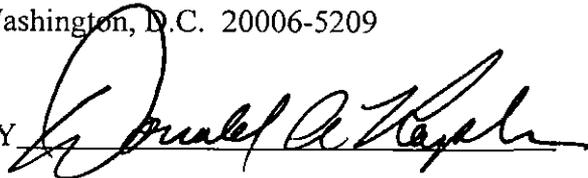
THEREFORE, for the reasons set forth above, PP&L objections to the Environmentalists' Data Requests Nos. 196, 211-212, 223(a) and 232(b) should be sustained and the aforementioned data requests stricken.

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

BY



Counsel For Pennsylvania Power & Light Company

Date: June 16, 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 Enron Capital and Trade Resources' Interrogatories, Set 3 and Pennsylvania Power & Light Company's objections to Environmentalists' Data Requests, Set 4 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

Federal Express

George M. Kashi
Administrative Law Judge
North Office Building
North St. and Commonwealth Ave.
Harrisburg, PA 17105-3265

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

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

RECEIVED

JUN 16 1997

PA PUBLIC UTILITY COMMISSION
PROTHONOTARY'S OFFICE

U.S. Mail

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

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

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

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

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

Rhonda Hendrickson
100 North 10th Street
Harrisburg, PA 17108

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

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

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

Michael J. Vough, Esquire
Vough & Associates
126 South Main Street
Pittston, PA 18640

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

David A. McCormick, Esquire
Department Of The Army
Office Of The Judge Advocate General
901 North Stuart Street, Suite 526
Arlington, VA 22203-1837

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

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

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

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

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

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

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

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

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

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

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

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

Terrance J. Fitzpatrick, Esquire
Ryan, Russell, Ogden & Seltzer, LLP
800 North Third Street
Suite 101
Harrisburg, PA 17102-2025

John Munsch
Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Paul E. Nordstrom
Verner & Lipfert, Berhard, McPherson & Hand
901 15th Street, N.W., Suite 700
Washington, DC 20005

Joseph A. Dworetzky, Esquire
Hangley, Aronchick, Segal and Pudlin
One Logan Square
12th Floor
Philadelphia, PA 19103-6933

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

Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110

Dated this 16th day of June, 1997.



Donald A. Kaplan

CNG Energy Services Corporation

A **CNG** COMPANY

One Park Ridge Center
P.O. Box 15746
Pittsburgh, PA 15244-0746
(412) 787-4268
(412) 787-4464 Fax
E-Mail: Gary_A._Jeffries@ESC.CNG.COM

GARY A. JEFFRIES
Senior Attorney

June 16, 1997

001223

Via Overnight Mail

KJR

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

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

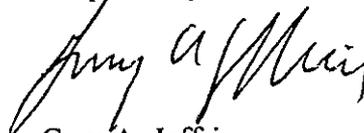
Dear Judge Kashi:

CNG Energy Services Corporation ("CNG") is an intervenor in the above captioned proceeding. CNG has decided to discontinue its individual participation in this proceeding. Instead, CNG will pursue its interests in this matter through the Mid-Atlantic Power Supply Association ("MAPSA"), of which CNG is a member company. MAPSA is an existing party in this proceeding.

Accordingly, CNG hereby notifies you and all parties that CNG will not be filing its own individual testimony nor participating in any other individual capacity in this proceeding. CNG's involvement in the case will henceforth be entirely through MAPSA.

Notwithstanding the above, CNG does respectfully request to remain on the service list in this proceeding.

Respectfully submitted,


Gary A. Jeffries

97 JUN 18 AM 11:00
RECEIVED
PROTHONOTARY'S OFFICE

UNRECORDED

JUN 19 1997

cc: All Parties (First Class Mail)
James McNulty, Acting Prothonotary (First Class Mail) ✓

DOCUMENT
FOLDER

Certificate of Service

I hereby certify that I have served the foregoing document, dated June 16, 1997, by First Class Mail, upon the persons addressed below:

Paul E. Russell
Associate General Counsel
Two North Ninth Street
Allentown, PA 18101-1179

Johnnie E. Simms
Scott H. Debroff
PA PUC Office of Trial Staff
P.O. Box 3265
Harrisburg, PA 17105-3265

Craig R. Burgraff, Esquire
Barrett C. Sheridan, Esquire
1425 Strawberry Square
Harrisburg, PA 17120

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

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

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

Randall V. Griffin, Esquire
800 King Street
P.O. Box 231
Wilmington, DE 19899

Gene Stilp, Coordinator
1550 FCVR
Harrisburg, PA 17112-9240

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

Lisa Helpert
Preston, Gates, Ellis & Rouvelas Meeds
1735 New York Avenue, N.W.
Washington, DC 20006

Joel D. Newton, Esquire
901 15th Street, NW
Washington, DC 20005-2301

Michael T. Vough, Esquire
Greater Pittston Professional-Center
126 South Main Street
Pittston, PA 18640-1793

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
100 Pine Street
Harrisburg, PA 17108-1166

Daniel Clearfield, Esquire
Alan Kohler, Esquire
305 North Front Street, Suite 401
Harrisburg, PA 17101

001224

97 JUN 18 AM 11:02

RECEIVED
PROTHONOTARY'S OFFICE

David A. McCormick, Regulatory Law Office
901 N. Stuart Street, Room 713
DAJA-RL 3949
Arlington, VA 22203-1837

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

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870-9357

Harry S. Geller
118 Locust Street
Harrisburg, PA 17101

Billie Ramsey, Executive Director
1300 Market Street
Suite 7
Lemoyne, PA 17043

William T. Hawke, Esquire
Janet L. Miller, Esquire
P.O. Box 1778, Harrisburg Energy Center
Harrisburg, PA 17105-1778

Noel H. Trask, Esquire
Mary McFall Hopper
2301 Market Street, S23-1
Philadelphia, PA 19103

Terrance J. Fitzpatrick, Esquire
Ryan, Russell, Ogden, Seltzer, LLP
800 N. Third Street, Suite 101
Harrisburg, PA 17102

Robert P. Haynes, III
Mette, Evans & Woodside
P.O. Box 5950
Harrisburg, PA 17110

Gordon E. Goodman, President
600 North Dairy Ashford, DH-1081
Houston, TX 77079

Eric Joseph Epstein
2308 Brandywine Drive
Harrisburg, PA 17110

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

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

Richard L. Caplan, Esquire
Caplan & Luber, LLP
40 Darby Road
Paoli, PA 19301-1461

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

John H. Koch
428 Robin Road
Allentown, PA 18104-6724

P. Armstrong, Esquire
R. Matz, Esquire
Thomas, Thomas, Armstrong & Niesen
212 Locust Street, Ste. 500, P.O. Box 9500
Harrisburg, PA 17108-9500

Stephen J. Baron
J. Kennedy & Associates, Inc.
35 Glenake Parkway, Suite 475
Atlanta, GA 30328

David W. Francis, Esquire
114 N. Second Street
Harrisburg, PA 17101

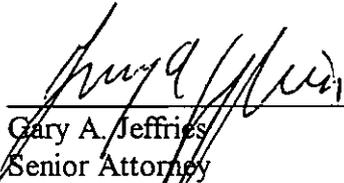
Michael L. Kessler, Vice President
and General Counsel
111 S. Alfred Street
Alexandria, VA 22304

John Gallagher
Duquesne Light Co.
200 N. 3rd Street, Suite 300
P.O. Box 12105
Harrisburg, PA 17108-2105

George F. Denardo
Lucent Technologies
555 Union Boulevard
Allentown, PA 18103

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

Brian A. Rider, President
Pennsylvania Retailers' Assoc.
224 Pine Street
Harrisburg, PA 17101-1325



Gary A. Jeffries
Senior Attorney
CNG Energy Services Corporation
One Park Ridge Center
P.O. Box 15746
Pittsburgh, PA 15244-0746
(412) 787-4268

Dated: June 16, 1997