

MCNEES, WALLACE & NURICK  
ATTORNEYS AT LAW

BRUCE D. BAGLEY  
ALAN R. BOYNTON, JR.  
ERIC L. BROSSMAN  
ROBERT M. CHERRY  
LOUIS A. DEJOE  
DAVID B. DISNEY  
MICHAEL A. DOCTROW  
ELIZABETH A. DOUGHERTY  
HARVEY FREEDENBERG  
JAMES L. FRITZ  
W. JEFFRY JAMOUNEAU  
MICHAEL G. JARMAN  
DONALD B. KAUFMAN  
STEPHEN R. KERN  
DAVID M. KLEPPINGER  
BERNARD A. LABUSKES, JR.  
DELANO M. LANTZ

DAVID E. LEHMAN  
FRANKLIN A. MILES, JR.  
ROBERT A. MILLS  
STEPHEN A. MOORE  
JOHN S. OYLER  
GARY A. RITTER  
DANA STEVENS SCADUTO  
RICHARD W. STEVENSON  
DIANE M. TOKARSKY  
CATHERINE E. WALTERS  
DAVID M. WATTS, JR.  
STEVEN J. WEINGARTEN  
NEAL S. WEST  
NORMAN I. WHITE  
LAWRENCE R. WIEDER  
WILLIAM M. YOUNG, JR.

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

1200 G STREET N.W.  
SUITE 800  
WASHINGTON, D.C. 20005  
TELEPHONE (202) 434-8991 Fax (202) 434-8707

<http://www.mwn.com>

OF COUNSEL  
ROBERT H. GRISWOLD  
FRANCIS B. HAAS, JR.  
RICHARD R. LEFEVER  
SAMUEL A. SCHRECKENGAUST, JR.

JENNIFER L. BAKER  
JEFFREY F. CHAMPAGNE  
JAMES P. DEANGELO  
JAMES P. DOUGHERTY  
KATHLEEN A. DUNST  
DEBRA P. FOURLAS  
HELEN L. GEMMILL  
ROBERT J. GODUTO  
SCOTT A. GOULD  
RANDOLPH B. HOUSTON, JR.  
BRIAN F. JACKSON  
BRIAN E. KAMOE  
MICHAEL R. KELLEY  
PETER F. KRIETE  
JAMES W. KUTZ  
MARCUS J. LEMON  
ANDREW L. LEVY

LOUISE HUTCHINSON MARA  
F. STEPHENSON MATTHEW  
JON R. MOONEY  
SHARON R. PAXTON  
CHAD F. PHIPPS  
PAMELA C. POLACEK  
JONATHAN H. RUDD  
R. RANDALL SCHMIDT  
BRUCE R. SPICER  
CAROL A. STEINOUR  
SUSAN V. STEWART  
ROBERT F. TEPLITZ  
ROBERT A. WEISHAAR, JR.  
DERRICK P. WILLIAMSON  
JOHN A. WITHEROW, JR.  
KATHLEEN A. WOLOWSKI  
WILLIAM D. WRIGHT  
SAMUEL S. YUN

DOCUMENT  
FOLDER

Writer's Direct Dial:  
(717) 237-5368  
E-Mail: [ppolacek@mwn.com](mailto:ppolacek@mwn.com)

August 14, 1997

Joel D. Newton, Esq.  
Verner, Liipfert, Bernhard, McPherson and Hand  
901 15th Street, N.W.  
Washington, DC 20005-2301

VIA FEDERAL EXPRESS

PROTHONOTARY'S OFFICE  
RECEIVED  
AUG 14 2:14 PM '97

Re: **Pennsylvania Public Utility Commission v. Pennsylvania Power & Light Company - 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 Mr. Newton:

Enclosed are the responses of the PP&L Industrial Customer Alliance ("PPLICA") to Allegheny Power's Interrogatories and Requests for Documents - Set I.

Very truly yours,

MCNEES, WALLACE & NURICK

By

*Pamela C. Polacek*

Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/clc

Enclosures

c: Certificate of Service

James J. McNulty, Prothonotary (transmittal letter and Certificate of Service only)

CERTIFICATE OF SERVICE

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

VIA FEDERAL EXPRESS

RECEIVED

AUG 14 1997

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

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

PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

Enron Corporation  
Attn: James D. Steffes  
1400 Smith Street  
P.O. Box 4428  
Houston, TX 77002

DOCUMENT  
FOLDER

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

Stephen L. Huntoon  
Mary McFall Hopper  
PECO Energy Company  
2301 Market Street, S2B-1  
Philadelphia, PA 19103

DOCKETED  
AUG 18 1997

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

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

David A. McCormick, Esquire  
Regulatory Law Office  
United States Army Legal Services Agency  
Department of the Army  
DAJA-RL3949  
901 North Stuart Street, Room 317  
Arlington, VA 22203-1837

Mr. Robert D. Knecht  
Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

Richard L. Caplan, Esquire  
Caplan and Luber, LLP  
40 Darby Road  
Paoli, PA 19301

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

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

Neil Talbot  
81 Grand Street, No. 5  
New York, NY 10013

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

**CERTIFICATE OF SERVICE**

**Page 2**

**Docket No. R-00973954**

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

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

Mary Huwaldt, Esquire  
Caplan & Luber  
40 Darby Road  
Paoli, PA 17301

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

Michael L. Kessler  
Vice President and General Counsel  
American Energy Solutions, Inc.  
111 South Alfred Street  
Alexandria, VA 22314

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

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

Gordon J. Smith, Esq.  
John & Hengerer  
1200 17th Street, N.W., Suite 600  
Washington, D.C. 20036-3006

Keith M. Sappenfield, II  
Director of Marketing Support  
Noram Energy Mangement, Inc.  
P.O. Box 2628  
Houston, TX 77252-2628

Jerry Mendl  
MSB Energy Associates  
7507 Hubbard Avenue, Suite 200  
Middleton, WI 53562

John R. Orr, Esq.  
Duke Energy Trading and Marketing,  
L.L.C.  
One Westchase Center, 10777 Westheimer  
Suite 650  
Houston, TX 77042

Clinton A. Vince, Esquire  
Paul E. Nordstrom, Esquire  
Deborah A. Swanstrom, Esquire  
Joel D. Newton, Esquire  
Verner, Liipfert, Bernhard, McPherson &  
Hand  
901 15th Street, NW  
Washington, DC 20005-2301

Barbara R. Alexander  
15 Wedgewood Drive  
Winthrop, ME 04564

Joseph A. Dworetzky, Esq.  
John P. Lavelle, Jr., Esq.  
Hangley, Aronchick, Segal & Pudlin  
One Logan Square, 12th Floor  
Philadelphia, PA 19103

David Cruthirds  
Electric Clearinghouse, Inc.  
1000 Louisiana, Suite 5800  
Houston, TX 77002-5050

Norma J. Rosner, Esq.  
General Counsel  
Vastar Power Marketing, Inc.  
200 Westlake Park Boulevard  
Houston, TX 77079

**CERTIFICATE OF SERVICE**

**Page 3**

**Docket No. R-00973954**

Scott T. Jones  
The Economic Resource Group, Inc.  
One Mifflin Place  
Cambridge, MA 02138

Fred Zalzman  
Pace Energy Project  
Pace University School of Law  
78 North Broadway  
White Plains, NY 10603

**VIA FIRST CLASS MAIL**

Alan J. Barak, Esquire  
Alan J. Barak, PC  
Penn Energy Project  
1417 Blue Mountain Parkway  
Harrisburg, PA 17112

John P. Zinkand  
Executive Vice President  
Pennsylvania Petroleum Association  
Suite 121, Building 2  
2001 North Front Street  
Harrisburg, PA 17102

Daniel Clearfield, Esquire  
Alan Kohler, Esquire  
Robert Longwell, Esquire  
Wolf, Block, Schorr and Solis-Cohen  
305 North Front Street, Suite 401  
Harrisburg, PA 17101

Linda C. Smith, Esq.  
Dilworth, Paxson, Kalish & Kauffman, LLP  
305 North Front Street, Suite 403  
Harrisburg, PA 17101-1236

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

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

Craig R. Burgraff  
Barrett C. Sheridan  
James A. Mullins  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

David W. Francis, Esquire  
Powell, Trachtman, Logan, Carrle,  
Bowman & Lombardo, P.C.  
114 North Second Street  
Harrisburg, PA 17101

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

Craig A. Doll, Esquire  
214 State Street  
Harrisburg, PA 17112

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

Eric Joseph Epstein  
2308 Brandywine Drive  
Harrisburg, PA 17110

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

**CERTIFICATE OF SERVICE**

**Page 4**

**Docket No. R-00973954**

William T. Hawke, Esquire  
Janet L. Miller, Esquire  
Todd S. Stuart, Esquire  
Malatesta, Hawke & McKeon, LLP  
Harrisburg Energy Center  
100 North 10th Street  
Harrisburg, PA 17101

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

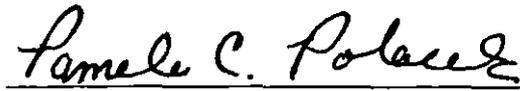
Robert P. Haynes, III, Esquire  
Mette, Evans & Woodside  
3401 North Front Street  
P.O. Box 5950  
Harrisburg, PA 17110-0950

John Haucke; Executive Vice President  
Pennsylvania Association of Plumbing,  
Heating, Cooling Contractors, Inc.  
4015 Jonestown Road  
Harrisburg, PA 17109-9109

Susan M. Shanaman, Esquire  
212 North Third Street  
Suite 203  
Harrisburg, PA 17101-1505

Brian A. Rider  
Pennsylvania Retailers Association  
224 Pine Street  
Harrisburg, PA 17101-1325

Patricia Armstrong, Esquire  
Thomas, Thomas, Armstrong & Niesen  
212 Locust Street  
P.O. Box 9500  
Harrisburg, PA 17108-9500

  
\_\_\_\_\_  
Pamela C. Polacek, Esq.

Counsel to PP&L Industrial Customer Alliance

Dated this 14th day of August, 1997, at Harrisburg, Pennsylvania.



**Pennsylvania Power & Light Company**

2 N 9TH ST ALLENTOWN PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

KJR

August 14, 1997

DOCUMENT  
FOLDER

**VIA FEDERAL EXPRESS**

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**

002373

97 AUG 15 PM 3:53

RECEIVED  
PROTHONOTARY'S OFFICE

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

To Open Envelope, Turn Top Flap, Remove Seal

F  
R  
O  
M  
PENNSYLVANIA POWER LIGHT  
2 N 9TH ST  
ALLENTOWN PA 18101

7999269 563

These No.'s  
MUST match

Bill To  
Seq. No. 23  
Origin ABE

Shipment No.  
7999269-563



007999269 563

PA PUC NO OFC BLDG  
PROTHONOTARY  
NORTH ST & COMMONWLTH AVE  
HARRISBURG PA  
JAMES J MCNULTY ESQ  
Zip 17105

Service  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]



891 (12/85)

Billing Ref. 205  
Weight 1-L  
Sent By SHIPPER/CORPORATE MAIL N1 610-774-6131  
Dims

MDTA 3Q ABH

ease place

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

\_\_\_\_\_  
CERTIFICATION OF SERVICE  
\_\_\_\_\_

**DOCKETED**  
AUG 18 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 IV, Questions 1 through 20 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

DOCUMENT  
FOLDER

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

002374

97 AUG 15 PM 3:53  
RECEIVED  
PROTHONOTARY'S OFFICE

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  
Wolf, Block, Schorr and Solis-Cohen  
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, 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 17110

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

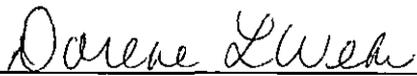
Joseph A. Dworetzky, Esquire  
Hangley, Aronchick, Segal and Pudlin  
One Logan Square  
12th Floor  
Philadelphia, PA 19103-6933

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

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

Robert Mills, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108

Dated this 14th day of August, 1997.

  
\_\_\_\_\_  
Dorene L. Wehr



**Pennsylvania Power & Light Company**

2 N 9TH ST ALLENTOWN PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

August 14, 1997

002377

**VIA FEDERAL EXPRESS**

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

DOCUMENT  
FOLDER

KJR

RECEIVED  
PROTHONOTARY'S OFFICE

97 AUG 15 PM 3:54

**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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DOCUMENT  
FOLDER

\_\_\_\_\_  
CERTIFICATION OF SERVICE  
\_\_\_\_\_

**DOCKETED**  
AUG 18 1997

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to Mid Atlantic Power Supply Association's Interrogatories, Set I, Questions STJ 1 through 23; JMK 1 and 2; JAK 1 and 2; and RMG 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

002378

RECEIVED  
PROTHONOTARY'S OFFICE

97 AUG 15 PM 3:54

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  
Wolf, Block, Schorr and Solis-Cohen  
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 17110

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

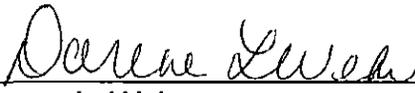
Joseph A. Dworetzky, Esquire  
Hangley, Aronchick, Segal and Pudlin  
One Logan Square  
12th Floor  
Philadelphia, PA 19103-6933

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

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

Robert Mills, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108

Dated this 14th day of August, 1997.

  
\_\_\_\_\_  
Dorene L. Wehr



**Pennsylvania Power & Light Company**

2 N 9TH ST ALLENTOWN PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

August 14, 1997

KJR

**VIA FEDERAL EXPRESS**

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

**DOCUMENT  
FOLDER**

002375

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

RECEIVED  
PROTHONOTARY'S OFFICE

97 AUG 15 PM 3:04

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*

Paul E. Russell

Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

---

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

**DOCKETED**  
AUG 18 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 Office Of Consumer Advocate's Interrogatories, Set XV, Questions 1 through 12 upon the active participants listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**Federal Express**

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

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

**DOCUMENT  
FOLDER**

002376

97 AUG 15 PM 3:54  
RECEIVED  
PROTHONOTARY'S OFFICE

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  
Wolf, Block, Schorr and Solis-Cohen  
305 North Front Street  
Harrisburg, PA 17101

Mary Huwaldt, Esquire  
Caplan & Lubner, 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 17110

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

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

Robert Mills, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108

Dated this 14th day of August, 1997.



---

Dorene L. Wehr



RECEIVED

AUG 18 1997

**Office of the Mayor**

**The City of Harrisburg**

City Government Center

Harrisburg, PA 17101-1678

Stephen R. Reed

Mayor

KJR

RECEIVED  
97 AUG 19 AM 8:58  
PA P.U.C.  
PROTHONOTARY'S OFFICE

August 14, 1997

The Honorable George Kashi  
Administrative Law Judge  
Public Utility Commission  
Commonwealth of Pennsylvania  
Post Office Box 3265  
Harrisburg, PA 17105-3265

KJR

Dear Judge Kashi:

This letter is written in connection with the application for approval of a Restructuring Plan by Pennsylvania Power and Light Company, listed in the PUC Docket as R-00973954.

A central issue to be heard by the PUC in this matter relates to what amount of stranded costs will be allowed for PP&L to recover from its rate payers.

There are considerable sums involved and because of this, the PUC has scheduled public hearings on September 2-4, 1997 in Lancaster, Bethlehem and Scranton respectively. We think it well that this matter receive a public airing in these various parts of the PP&L service area.

The purpose of this letter is to respectfully request that the same type of public hearing be held in Harrisburg following the earlier September hearings in other parts of the state. The Harrisburg Region is the only area not included in the geographic scope of the hearings being held on September 2nd, 3rd and 4th. We are aware that a public hearing had been held this past May on this matter but that it received scant attention and attendance. With the upcoming focus on this matter, a Harrisburg-based hearing held, for example, in the third week of September, would receive far greater attention and response than in the past.

DOCUMENT  
FOLDER

INDEXED

AUG 25 1997

The Honorable George Kashi  
Page Two  
August 14, 1997

Your consideration of this request is very much appreciated.

With warmest regards, I am

Yours sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Reed". The signature is written in a cursive style with a large initial "S" and "R".

Stephen R. Reed  
Mayor

SRR/psr-j