

PP&L C.E. Ex 1
R-973954
1469 JK 8/18/97

RESPONSE OF ENRON POWER MARKETING, INC. TO THE INTERROGATORIES OF PENNSYLVANIA POWER & LIGHT COMPANY, INTERROGATORY NO. 29, DATED JULY 21, 1997 SUBMITTED IN DOCKET NO. R-00973954.

Request:

- 29. Please provide and explain Dr. Mayo's understanding of the difference, if any, between a monopoly and monopolization.

Response:

A monopoly occurs when a single firm provides a product or service in a market. Monopolization occurs when a firm with significant monopoly power seeks to willfully maintain or extend that monopoly power as distinct from growth or development as a consequence of a offering superior product or possession of superior business acumen.

Response prepared by John Mayo, Ph.D.

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RESPONSE OF ENRON POWER MARKETING, INC. TO THE INTERROGATORIES OF PENNSYLVANIA POWER & LIGHT COMPANY, INTERROGATORY NO. 7, DATED JULY 21, 1997 SUBMITTED IN DOCKET NO. R-00973954.

Request:

- 7. Is it the view of Dr. Mayo or any other witness for Enron that it is possible to determine that PP&L has market power without defining a relevant market? If so, please provide all support for that conclusion, including any work papers, documents and information used in reaching that conclusion.

Response:

No.

Response prepared by John Mayo, Ph.D.

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RESPONSE OF ENRON POWER MARKETING, INC. TO THE INTERROGATORIES OF PENNSYLVANIA POWER & LIGHT COMPANY, INTERROGATORY NO. 4, DATED JULY 21, 1997 SUBMITTED IN DOCKET NO. R-00973954.

Request:

4. Has Dr. Mayo or any other witness for Enron conducted an analysis of competition for sales of the electricity at wholesale in Pennsylvania or any other area that includes all or part of PP&L's retail service territory? If so, please provide all details of that analysis, including its conclusions, and any work papers, information used in conducting that analysis and any documents discussing its conclusions.

Response:

No.

Response prepared by John Mayo, Ph.D.

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RESPONSE OF ENRON POWER MARKETING, INC. TO THE INTERROGATORIES OF PENNSYLVANIA POWER & LIGHT COMPANY, INTERROGATORY NO. 30, DATED JULY 21, 1997 SUBMITTED IN DOCKET NO. R-00973954.

Request:

30. Is it the view of Dr. Mayo or any other witness for Enron that PP&L is engaging in monopolization or will engage in monopolization once customer choice is implemented under the Electricity Generation Competition and Customer Choice Act? If so, please provide all details of that analysis, including its conclusions, and any work papers, information used in conducting that analysis and any documents discussing its conclusions.

Response:

It is not Dr. Mayo's contention that PP&L has engaged in monopolization to this point. It is Dr. Mayo's contention that as retail-stage competition for electricity is introduced economic conditions become ripe for anticompetitive practices that may rise to the status of monopolization.

Response prepared by John Mayo, Ph.D.

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RESPONSE OF ENRON POWER MARKETING, INC. TO THE INTERROGATORIES OF PENNSYLVANIA POWER & LIGHT COMPANY, INTERROGATORY NO. 17, DATED JULY 21, 1997 SUBMITTED IN DOCKET NO. R-00973954.

Request:

- 17. Does Enron expect that PP&L will be its only source of wholesale power for resale to Pennsylvania retail customers once customer choice is implemented under the Electricity Generation Competition and Customer Choice Act?

Response:

Dr. Mayo is unaware of Enron's intent regarding its source of wholesale power for resale to Pennsylvania retail customers once customer choice is implemented under the Electricity Generation Competition and Customer Choice Act. It is expected that PP&L would not be Enron's only source of wholesale power.

Response prepared by John Mayo, Ph.D.

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