



DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY CHESAPEAKE
LITIGATION HEADQUARTERS
WASHINGTON NAVY YARD
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WASHINGTON DC 20374-5051

IN REPLY REFER TO:

13 March 2000

James J. McNulty, Secretary
PA PublicUtility Commission
Room B-29, North Office Building
Harrisburg, PA 17105-3265

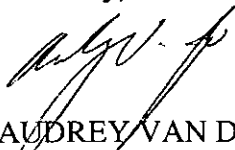
ORIGINAL

Dear Secretary McNulty:

Enclosed please find for filing an original and three copies of the Notice of the Department of the Navy to Intervene Out of Time in Docket A-110550F0147.

**DOCUMENT
FOLDER**

Sincerely,


AUDREY VAN DYKE
Counsel for the
Secretary of the Navy
(202) 685-1931
fax (202) 433-2591

Cc: Parties of record

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MAR 13 2000

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF PECO ENERGY)
COMPANY FOR APPROVAL OF A)
PLAN OF CORPORATE)
RESTRUCTURING AND MERGER)
WITH UNICORN CO.)

Docket No. A-110550F0147

ORIGINAL

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Secretary of the Navy through authorized counsel hereby gives Notice of Intervention in the above-referenced proceeding. The Navy requests to be permitted to intervene out of time in this proceeding. The appropriate Rate Intervention office only became aware of this proceeding last week and immediately notified the Company.

As grounds for said intervention, Petitioner avers as follows: Petitioner maintains a military installation within the Commonwealth of Pennsylvania which obtains and uses electric services.

The Department of the Navy will be specifically affected by the filing in the above Docket as the filing may affect rates paid by the Navy for electric services.

The Department of the Navy seeks full intervenor status in order to participate in hearings and discussions regarding all matters pertaining to this Docket and to cross-

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examine the witnesses of other parties. The Navy is aware that settlement discussions are ongoing, and does not seek to broaden the issues involved in the settlement discussions.

Communications in regard to this Petition are to be addressed to:

Sam DeFrawi
Engineering Field Activity Chesapeake
Attn: Navy Rate Intervention
1314 Harwood Street SW
Washington Navy Yard D.C. 20374-5018

And

Audrey Van Dyke
Litigation Command
Building 166, Room 340
1013 O Street SE
Washington Navy Yard D.C. 20374-5051
Telephone (202) 685-1931

Wherefore, Petitioner requests an order granting its Notice of Intervention with all the pertinent rights.

Respectfully submitted,



AUDREY VAN DYKE
Counsel for the
Secretary of the Navy
(202) 685-1931
fax (202) 433-2591

Dated this 13th day of March 2000
Cc: Parties of record

CERTIFICATE OF SERVICE

This is to certify that on 13 March 2000 copies of the Notice of Intervention of the Department of the Navy in Docket No. A-110550F0147 were mailed regular mail to the service list.

DATE: March 14, 2000

SUBJECT: A-110550F0147

TO: Office of Administrative Law Judge

FROM: James J. McNulty, Secretary

LAF

Application of PECO Energy Company, Pursuant to Chapters 11, 19, 21, 22 and 28 of the Public Utility Code, for Approval of (1) a Plan of Corporate Restructuring, Including the Creation of a Holding Company, and (2) the Merger of the Newly Formed Holding Company and Unicom Corporation.

Attached is copy of a Petition to Intervene Out of Time filed by the Department of the Navy, in connection with the above docketed proceeding.

This matter is assigned to your Office for appropriate action.

Attachment

cc: OTS
LAW

laf

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MAR 15 2000

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March 14 2000

Tanya McCloskey
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923

DOCUMENT
FOLDER

RE: Application of PECO Energy Company to Chapters 11, 19, 21, 22 and 28
of the Public Utility Code, for Approval of (1) A Plan of Corporate
Restructuring, including the creation of a Holding Company and (2) the
Merger of the Newly Formed Holding Company and Unicom Corporation,
Docket No. A-110550F0147

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1981

Dear Ms. McCloskey:

Enclosed, please find PECO's CONFIDENTIAL response to OCA-X-9 and 11.

Very truly yours,

Paul Bonney/RHS
Paul R. Bonney
Assistant General Counsel

/rhs

EEF

Enclosure

cc: James J. McNulty, Secretary (cover letter & certificate of service only)
Certificate of Service

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Certificate of Service

A-110550F0147

I hereby certify that I have this day served the foregoing document on the following in the matter of PECO Energy Company's Application For Approval of (1) A Plan of Corporate Restructuring, Including the Creation of a Holding Company and (2) The Merger of the Newly Formed Holding Company and Unicom Corporation.

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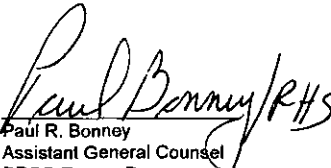
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Dated: March 14, 2000



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March 14 2000

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DOCUMENT
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RE: Application of PECO Energy Company to Chapters 11, 19, 21, 22 and 28 of the Public Utility Code, for Approval of (1) A Plan of Corporate Restructuring, including the creation of a Holding Company and (2) the Merger of the Newly Formed Holding Company and Unicom Corporation, Docket No. A-110550F0147

Dear Mr. Hamermesh:

Enclosed, please find PECO's response to MAPSA-IV-14 and PECO's CONFIDENTIAL response to MAPSA-V-5,6,7.

Very truly yours,

Paul Bonney / RLS
Paul R. Bonney
Assistant General Counsel

/rls

Enclosure

cc: James J. McNulty, Secretary (cover letter & certificate of Service only)
Certificate of Service

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Certificate of Service

I hereby certify that I have this day served the foregoing document on the following in the matter of PECO Energy Company's Application For Approval of (1) A Plan of Corporate Restructuring, Including the Creation of a Holding Company and (2) The Merger of the Newly Formed Holding Company and Unicom Corporation.

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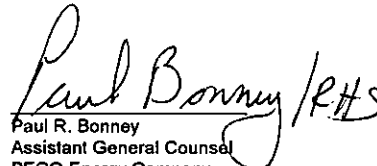
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Dated: March 14, 2000



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March 14, 2000

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A-110550 F0147

Re: **Docket No. A-00110550F0147**
Request for Addition to Official Service List

Dear Mr. McNulty:

I represent NewEnergy East, L.L.C. ("NewEnergy") in the above captioned matter. On March 8, 2000, Administrative Law Judge Charles E. Rainey, Jr. granted NewEnergy's Protest and Petition to Intervene, and my name and address was correctly added to the official service list in this proceeding.

This is to request the addition to the official service list of one other counsel to NewEnergy. Mr. Townsend is my colleague in our Chicago office, while I am a resident of my firm's Baltimore office. Mr. Townsend's information is:

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Thank you for your attention to this matter. Please call if you have any questions.

Very truly yours,

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RE: Application of PECO Energy Company to Chapters 11, 19, 21, 22 and 28 of the Public Utility Code, for Approval of (1) A Plan of Corporate Restructuring, including the creation of a Holding Company and (2) the Merger of the Newly Formed Holding Company and Unicom Corporation, Docket No. A-110550F0147

Dear Mr. Downey:

Enclosed, please find PECO's response to AMTRAK-III-D-2.

Very truly yours,

Paul Bonney / rhs
Paul R. Bonney
Assistant General Counsel

/rhs

Enclosure

cc: James J. McNulty, Secretary (cover letter & certificate of service only)
Certificate of Service

Certificate of Service

A-110550F0147

I hereby certify that I have this day served the foregoing document on the following in the matter of PECO Energy Company's Application For Approval of (1) A Plan of Corporate Restructuring, Including the Creation of a Holding Company and (2) The Merger of the Newly Formed Holding Company and Unicom Corporation.

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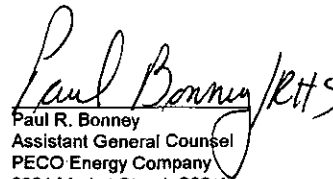
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2000
015

Dear Mr. Fiorentino:

Enclosed, please find PECO's CONFIDENTIAL response to CAC-I-32.

Very truly yours,

Paul Bonney/RHS
Paul R. Bonney
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Enclosure

cc: James J. McNulty, Secretary (cover letter & certificate of service only)
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I hereby certify that I have this day served the foregoing document on the following in the matter of PECO Energy Company's Application For Approval of (1) A Plan of Corporate Restructuring, Including the Creation of a Holding Company and (2) The Merger of the Newly Formed Holding Company and Unicom Corporation.

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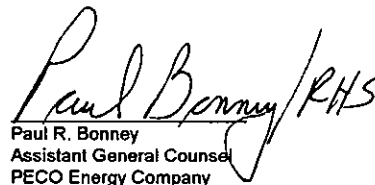
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Dear Ms. McCloskey:

Enclosed, please find PECO's CONFIDENTIAL response to OCA-VII-3.

Very truly yours,

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Certificate of Service

I hereby certify that I have this day served the foregoing document on the following in the matter of PECO Energy Company's Application For Approval of (1) A Plan of Corporate Restructuring, Including the Creation of a Holding Company and (2) The Merger of the Newly Formed Holding Company and Unicom Corporation.

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MAR 20 2000

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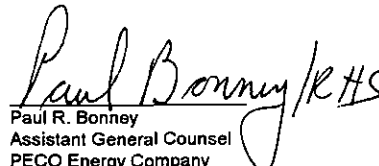
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Dated: March 15, 2000



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March 17, 2000

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DOCKETED

MAR 23 2000

Joseph A. Dworetzky, Esquire
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Re: Application of PECO Energy Company, Pursuant to Chapters 11, 19, 21, 22 and 28 of the Public Utility Code, for Approval of (1) A Plan of Corporate Restructuring, Including the Creation of a Holding Company and (2) The Merger of the Newly Formed Holding Company and Unicom Corporation
Docket No. A-110550F0147

Dear Joe:

Enclosed are PECO Energy Company's First Set of Interrogatories and Requests for Production of Documents in the referenced proceeding.

Sincerely,

Kent D. Murphy

KDM/mtg

Enclosure

cc: James McNulty (w/o enc.) ✓
Parties of Record

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