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DOCUMENT
FOLDER

~~April 18, 2000~~

DOCKETED
MAY 18 2000

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
North Office Building, Room B-18
Commonwealth Avenue & North Street
Harrisburg, PA 17105-3265

Re: Application of PECO Energy Company, Pursuant to Chapters 11, 19, 21, 22 & 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

Dear Secretary McNulty:

Enclosed for filing are an original and three copies of the Testimony of Scott Piersol on behalf of East Brandywine Township, which the Township is filing in lieu of Reply Comments.

Very truly yours,

Andrew D.H. Rau

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PA P.U.C.
SECRETARY'S BUREAU

ADHR/id
Enclosures

pc: John M. Quain, Chairman
Nora Mead Brownell, Commissioner
Aaron Wilson, Jr., Commissioner
Terrance J. Fitzpatrick, Commissioner
Robert K. Bloom, Commissioner
Administrative Law Judge Charles E. Rainey, Jr.
Certificate of Service

A-110550 F0147
5-10-00
Phila
RJS
ATTACHMENT TO
PARTIES EXH #1

EAST BRANDYWINE TOWNSHIP STATEMENT NO. 1

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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	:	APPLICATION DOCKET
CREATION OF A HOLDING COMPANY	:	NO. A-110550F0147
AND (2) THE MERGER OF THE NEWLY	:	
FORMED HOLDING COMPANY AND	:	
UNICOM CORPORATION	:	

TESTIMONY OF SCOTT T. PIERSOL

April 17, 2000

TESTIMONY OF SCOTT T. PIERSOL

Q. Please state your name, business address and position.

A. Scott T. Piersol, 12214 Horseshoe Pike, Downingtown, PA 19335. I am Township Manager for East Brandywine Township, an intervenor in this proceeding.

Q. Have you previously provided testimony in this proceeding?

A. Yes, I provided sworn testimony at the public input session in Wallace Township on March 30, 2000.

Q. What is the purpose of your testimony?

A. I am testifying in support of the Joint Petition Regarding Issues Raised By Wallace Township And East Brandywine Township (the "Township Joint Petition"), as well as the global settlement in this proceeding.

Q. Why did East Brandywine Township intervene in the PECO/Unicom merger proceeding?

A. Over the past several years, PECO's electric service reliability to the Township has not been at acceptable levels. The Township was concerned that the proposed merger with Unicom might take financial resources from PECO, or that the merger might cause a reorientation of PECO's focus away from local service reliability. In either case, the Township was concerned that the merger would

limit PECO's ability to upgrade service to the Township or cause electric service to degrade further.

Q. Have these reliability issues been addressed in the settlement documents to which you refer?

A. Yes. In the global settlement document, PECO has made commitments to improve its system-wide reliability beyond its current levels, as determined by certain Commission-approved measures of reliability. In the Township Joint Petition, PECO has committed to developing and implementing a reliability enhancement plan specific to the Township, and PECO has further committed to Commission oversight, review, and enforcement of its implementation of the Township reliability enhancement plan. We have been assured of adequate enforcement mechanisms available to the Township should PECO fail to follow through on those commitments.

Q. Do these provisions provide a public benefit to the residents of East Brandywine Township?

A. Yes. The Township and its residents will be the beneficiaries of the general commitments to system-wide reliability and of the focused commitment to enhance reliability in the Townships. In addition, we have the benefit of a public commitment by PECO of Commission oversight of this effort. The increased commitments and resources, coupled with the ongoing Commission oversight, provide an important public benefit to the residents of East Brandywine

Township. With those commitments, the Township is satisfied that the PECO/Unicom merger will not inhibit service reliability to the Township.

Instead, the Township anticipates that the merger will result in increased resources and attention to Township reliability issues.

Q. Does this conclude your testimony?

A. Yes.