

THE CITY OF PHILADELPHIA
DOCKET NO. A-110550F0160

PECO CROSS-EXAMINATION
EXHIBIT #1

9/23/05 Phila
FK

Responses of The City of Philadelphia to
Joint Applicants'
Interrogatories - Set III

2. In City of Philadelphia Statement No. 1, testimony of Kent R. Miller, at page 5, lines 1-2, Mr. Miller states that he has concern "whether these incidents are indicative of a trend of deteriorating distribution conditions in Center City, and by extension, the rest of Philadelphia."
- a. Is it Mr. Miller's opinion that a trend of deteriorating distribution conditions exists in the areas mentioned in his testimony?
- b. If the answer to subpart (a) is yes, please provide all studies, workpapers, documents, and other bases for Mr. Miller's opinion.

RESPONSE:

- a. The City does not have the data to determine whether or not there is a trend of deteriorating reliability. I, on behalf of the City, raised this question from a broad public policy perspective in that reliable electricity service is critical to the health, safety, and economic welfare of the City, its businesses, and residents.
- b. Please see my response to Q.2.a., which indicates that this issue stems from a broad public policy perspective. As such, I do not have any written documentation on this issue.

Answered and averred by:

Kent R. Miller, Ph.D., Executive Director, The City of Philadelphia Municipal Energy Office

July 29, 2005

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PA PUBLIC UTILITY COMMISSION
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THE CITY OF PHILADELPHIA
DOCKET NO. A-110550F0160

PECO CROSS-EXAMINATION
EXHIBIT #2

Phila 9/23/05
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Responses of The City of Philadelphia to
Joint Applicants'
Interrogatories - Set IV

4. Re page 6, lines 10-11. Please provide a copy of all analyses or other documentation that were considered by Dr. Miller in formulating his stated belief that "such a combination could be viable."

RESPONSE:

Dr. Miller did not consider any analyses or other documentation in formulating that statement.

Answered and averred by:

Kent R. Miller, Ph.D., Executive Director, The City of Philadelphia Municipal Energy Office

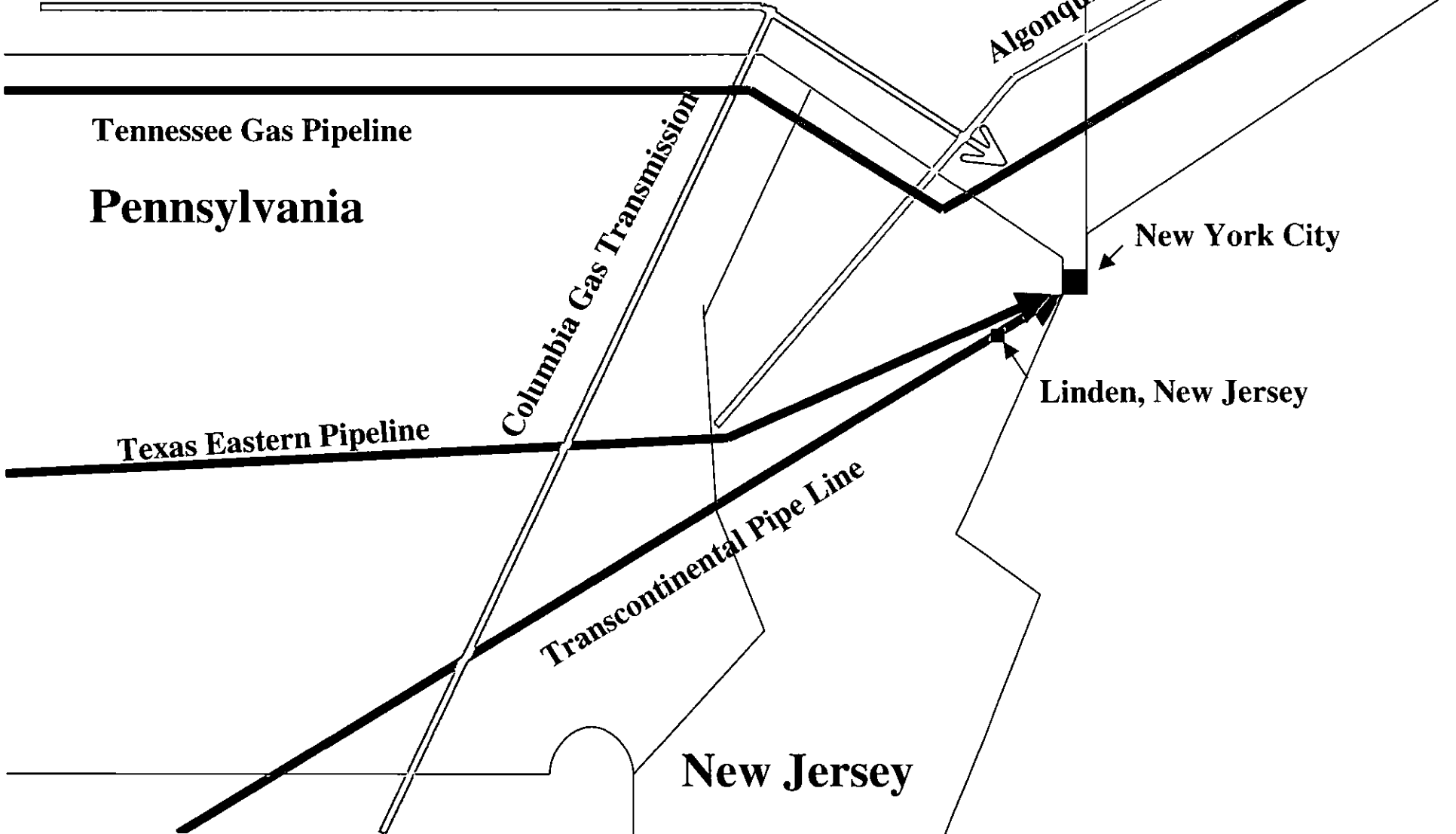
September 9, 2005

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Tennessee Gas Pipeline

Pennsylvania

Texas Eastern Pipeline

Columbia Gas Transmission

Transcontinental Pipe Line

Algonquin Gas Transmission

New York City

Linden, New Jersey

New Jersey