

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

MAR 24 1995

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION

v.

PENNSYLVANIA POWER & LIGHT COMPANY :

Docket No. R-943271

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OFFICE OF SMALL BUSINESS ADVOCATE  
PREHEARING MEMORANDUM

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I. INTRODUCTION

The Office of Small Business Advocate (OSBA) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 - 399.50 ("the Act"). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding and has filed a formal complaint against Supplement No. 50. Representing the OSBA in this matter is Assistant Small Business Advocate Karen Oill Moury. Please address all correspondence as follows:

Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101  
(717) 783-2525

As requested previously by the OSBA, all parties should continue to serve copies of all documents, including discovery, testimony,

briefs and all other matters upon Robert Knecht, simultaneously with service upon the OSBA.

## II. FILING BACKGROUND

On December 30, 1994, Pennsylvania Power & Light Company ("PP&L" or Company) filed Supplement No. 50 to Tariff Electric-Pa. P.U.C. No. 200 to become effective for electric service rendered on and after February 28, 1995. The proposed tariff, if approved by the Commission, would increase the rate revenues by \$261,635,000. The OSBA filed a formal complaint in this matter on January 24, 1995. By Commission Order adopted on January 26, 1995 and entered January 27, 1995, the supplement was suspended by operation of law until September 28, 1995.

## III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Preliminary review by the OSBA of the materials filed by Respondent in support of its filing indicates that the proposed new rates may be unlawful and unreasonable. Further, the OSBA believes that the proposed rates are unreasonably discriminatory in their application to small business consumers.

Of significant concern to the OSBA is the Company's proposal to increase the above system average rates of return provided by the small general service class (Rate Schedule GS-1) and the large general service class (Rate Schedule GS-3). While the OSBA is

attempting through discovery to determine the composition of these two rate classes, we assume that the majority of small businesses in PP&L's service territory take service under Rate Schedule GS-1 but that a measurable number of small businesses are classified as Rate Schedule GS-3 customers.

Under Supplement No. 50, the rate of return provided by GS-1 customers would increase from an above system average return of 14.41% to an above system average return of 15.64%, according to the cost allocation study performed by the Company for the test year ending September 30, 1995 utilizing the 12 coincident peak methodology. Further, the Company's cost study shows that the rate of return provided by that class of customers is almost twice the overall system return at present rates. Additionally, the Company's study indicates that the rate of return provided by the GS-3 class would increase from an above system average return of 9.93% to an above system average return of 11.73%.

The OSBA may present direct, rebuttal, and surrebuttal testimony in this proceeding on matters identified above, as well as any additional issues that may arise or become apparent during the course of the proceeding. Appearing as a witness for the OSBA and otherwise assisting in the development and presentation of the OSBA's case will be the following:

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

While it should be noted that the OSBA does not intend to duplicate the efforts of the Office of Trial Staff or the Office of Consumer Advocate, the OSBA will be an active participant in all phases of this proceeding and, as appropriate and necessary, will investigate and analyze each of Respondent's claims and proposals through its own testimony, through the cross-examination of witnesses who appear for other parties, and through briefing. To the extent an issue might arise wherein the impact on the interests of small business consumers of electric service would be unjustifiably different than or disproportionate to the impact on another class of customers, or otherwise lacking in reasonableness or basic fairness, the OSBA will actively pursue that issue.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding, regardless of whether the issue is a subject of testimony sponsored by the OSBA, to the extent the issue is one of Commission policy or legal interpretation, or where the facts are clear on the record.

#### IV. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions pursuant to Commission regulation at 52 Pa. Code §5.231 at the appropriate phase of this proceeding.

V. HEARING AND BRIEFING SCHEDULE

The OSBA will cooperate with the other parties in an effort to arrive at a mutually acceptable hearing and briefing schedule.

Respectfully submitted,

  
Karen Oill Moury  
Assistant Small Business Advocate

Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
(717) 783-2525

Dated: March 1, 1995

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION :  
v. : Docket No. R-943271  
PENNSYLVANIA POWER & LIGHT COMPANY :

CERTIFICATE OF SERVICE

I certify that I am today serving copies of the Prehearing Memorandum on behalf of the Office of Small Business Advocate by first class mail upon the persons addressed below:

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Associate General Counsel  
Pennsylvania Power & Light  
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Two North Ninth Street  
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Karen Oill Moury  
Assistant Small Business Advocate

Date: March 1, 1995

ORIGINAL

KJR



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 2, 1995

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

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PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**Re: Pennsylvania Power & Light Company  
Supplement No. 50 to Tariff  
Electric Pa. P.U.C. No. 200  
Docket No. R-00943271**

Dear Mr. Alford:

Enclosed for filing on behalf of Pennsylvania Power & Light Company (PP&L) are eight (8) copies of revised pages to Supplement No. 50 to PP&L's Tariff Electric - Pa. P.U.C. No. 200.

Supplement No. 50, which was filed on December 30, 1994, and requested to become effective 60 days after filing, i.e., on February 28, 1995, proposes to increase PP&L's retail base rates by approximately \$261 million, or about 11.7% (on total retail rates). By Commission order entered on January 27, 1995, Supplement No. 50 was suspended by operation of law until September 28, 1995.

Based on discussions with the Commission's Finance and Tariff Division, these tariff supplement page revisions are being filed to incorporate a corrected page numbering sequence.

Pursuant to 52 Pa. Code §1.11, I have attached U. S. Postal Form 3817 to evidence this filing.

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Mr. John G. Alford

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March 2, 1995

If you have any questions regarding the enclosed filing, please call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul E. Russell". The signature is written in a cursive style with a large initial "P" and "R".

Paul E. Russell

Enclosures

cc: Irwin A. Popowsky, Esquire  
Bernard J. Ryan, Jr., Esquire  
Charles F. Hoffman, Esquire  
Cheryl Walker Davis, Esquire  
Dr. Z. Ahmed Kaloko  
David M. Kleppinger, Esquire  
Mr. Robert F. Wilson

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INTERRUPTIBLE SERVICE BY AGREEMENT

APPLICATION

This Service is available to large general service customers who take service from available transmission lines of 66,000 volts or higher. The customer furnishes and maintains all equipment necessary to transform the energy from line voltage. This Service is available only to customers who require interruptible service which is different than that provided in the Company's Rate Schedules. It is available only to customers who accept service interruptions pursuant to a service agreement.

The Company will limit the amount of interruptible power to a total of 500 MW from all customers served under Rate Schedules LP-4, LP-5, LP-6, IS-1, and Interruptible Service by Agreement. For the purpose of determining this amount, interruptible power is the twelve month average of each customer's monthly Maximum On-peak Demand less the customer's contract Firm Power level.

(C)

NET MONTHLY SERVICES CHARGES

Charges for service shall be mutually agreed upon by the Company and the customer in a signed service agreement. The agreement's effectiveness will be conditioned upon Pennsylvania Public Utility Commission approval.

CONDITIONS OF SERVICE

A service agreement between the Company and the customer must include, at a minimum, the following:

- the term of the agreement for interruptible service,
- the delivery point location and characteristics of service,
- the metering for the customer's firm and interruptible service,
- the estimated firm power service level (KW),
- the maximum number of interruptions per year,
- the maximum duration of interruption per interruption period and the maximum aggregate hours of interruption per year and in any billing month,
- the amount of advance notice of an interruption given to a customer,
- the additional charge for continued use (KWH) of interruptible load (KW) during a period of economic load control,
- the penalty for failure to interrupt load (KW) when called for during an emergency interruption period,
- the basis for calculating billing demand (KW),
- the minimum billing demand (KW),
- the power factor acceptable to the Company at the delivery point,
- the monthly rate for firm and interruptible demand and energy, and the monthly minimum bill,
- terms for payments of bills rendered by the Company, and
- conditions for termination of the agreement.

RATE SCHEDULE LP-4  
LARGE GENERAL SERVICE AT 12,470 VOLTS OR HIGHER

APPLICATION RATE SCHEDULE LP-4

This rate schedule is for large general service supplied from available lines of 12,470 volts or higher when customer furnishes and maintains all equipment necessary to transform the energy from line voltage.

NET MONTHLY RATE (Effective 2-28-95)

\$6.55 per kilowatt for all kilowatts of the Billing KW.

(C) (I)

- 6.30 cts. per KWH for the first 200 KWH per kilowatt of the Billing KW.
- 5.60 cts. per KWH for the next 200 KWH per kilowatt of the Billing KW.
- 4.70 cts. per KWH for all additional KWH.

The Energy Cost Rate applies to all KWH supplied under this rate.

The Minimum Billing Demand is 25 KW.

The Net Monthly Rate Minimum is \$163.75.

BILLING KW

The Billing KW is the average number of kilowatts supplied during the 15 minute period of maximum use during the current billing period.

Time-of-Day metering and billing is available on request for an additional charge of \$15.00 per month for a minimum period of one year. The Billing KW is the average number of kilowatts supplied during the 15 minute period of maximum use during the on-peak hours of the current billing period.

(I)

ON-PEAK HOURS

On-peak hours for billing purposes are 7 a.m. to 3 p.m., 8 a.m. to 4 p.m., or 9 a.m. to 5 p.m. local time, at the option of the customer, Mondays to Fridays inclusive except, New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. The Company's system on-peak period is 7 a.m. to 9 p.m. local time.

OPTIONAL INTERRUPTIBLE POWER

Optional Interruptible Power is available to customers served under this rate schedule with at least 1,000 KW of year-round Interruptible Power who contract to accept interruptible service for at least one year, as detailed in this provision.

The Company will limit the amount of interruptible power to a total of 500 MW from all customers served under Rate Schedules LP-4, LP-5, LP-6, IS-1, and Interruptible Service by Agreement. For the purpose of determining this amount, interruptible power is the twelve month average of each customer's monthly Maximum On-peak Demand less the customer's contract Firm Power level.

(C)

BILLING KW CREDIT (Effective 2-28-95)

(C) (I)

The monthly Billing KW credit is calculated as:

$$\text{Billing KW Credit} = [\text{Interruptible Power} \times \text{Average On-peak Load Factor}] \times \$6.00 \text{ per KW}$$

ON-PEAK HOURS

On-peak hours for billing purposes are 7 a.m. to 7 p.m. local time, Mondays to Fridays inclusive except New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

MAXIMUM ON-PEAK DEMAND

Maximum On-peak Demand is the average number of kilowatts supplied during the 15 minute period of maximum use during the On-peak Hours of the current billing period.

(Continued)

(I) Indicated Increase  
(C) Indicates Change

**RATE SCHEDULE LP-4 (CONTINUED)**

**ON-PEAK LOAD FACTOR**

On-peak Load Factor for billing purposes is the ratio of the kilowatt-hours supplied during the On-peak Hours to the product of the Maximum On-peak Demand and the number of On-peak Hours for a billing period.

**AVERAGE ON-PEAK LOAD FACTOR**

Average On-peak Load Factor is the average of the On-peak Load Factors for the twelve months of the prior calendar year. Average On-peak Load Factor is recalculated annually and applied to service billed on and after April 1 of the current year under the Optional Interruptible Power provision. The Company may modify the On-peak Load Factors for the twelve months of the prior calendar year to reflect operations expected under this provision.

**FIRM POWER**

Firm Power is the level of KW demand which the customer has no obligation to curtail during an interruption of service called by the Company. The initial level of Firm Power shall be specified in the contract. This initial level will be adjusted by the Company to the level of Firm Power actually achieved by the customer during an emergency or an emergency test interruption period. The adjusted level shall become the level of Firm Power for the remaining term of the contract or until a new level of Firm Power is achieved during a subsequent emergency or an emergency test interruption period. The level of Firm Power shall not be adjusted below the initial level of Firm Power specified in the contract.

**INTERRUPTIBLE POWER**

Interruptible Power is the Maximum On-Peak Demand less the Firm Power.

**HOURS OF INTERRUPTION**

Load interruptions may be called by the Company as required for economic load control, for system and local emergencies, and for tests of the customer's ability and readiness to interrupt load during an emergency. The frequency of load interruptions shall be no more than 20 per calendar year with such interruptions being no more than 10 hours in any one day; or more often than five days in any single month; or more than 200 hours in a calendar year. Whenever possible, the customer will be notified in advance of a probable interruption and the estimated duration of the interruption. The customer is obligated to interrupt load during emergencies and emergency tests, but has the option to interrupt, or accept an additional charge for continued use, during periods of economic load control. The Company may cancel the contract for interruptible service if the customer fails to interrupt during an emergency or an emergency test interruption period.

The charge for continued use (KWH) of interruptible load (KW) during a period of economic load control is the sum of the charges under the rate plus the Company's estimated PJM Interconnection billing rate applied to all KWH used during the interruption period.

The additional charge for not interrupting load (KW) when called for during an emergency or an emergency test interruption period is: \$25.00 per KW for all KW by which the maximum 15 minute demand (KW) for the period of requested interruption exceeds the Firm Power (KW). This penalty shall be applied separately for each requested interruption, and shall be in addition to all other charges provided for under the rate.

(C)

(C) (I)

**INDUSTRIAL DEVELOPMENT INITIATIVES RIDER**

The Industrial Development Initiatives Rider included in this Tariff applies to eligible customers served under this Rate Schedule, except for customers served under the Optional Interruptible Power provision or the Economic Development Initiatives Rider.

**ECONOMIC DEVELOPMENT INITIATIVES RIDER**

The Economic Development Initiatives Rider included in this Tariff applies to eligible customers served under this Rate Schedule, except for customers served under the Optional Interruptible Power provision or the Industrial Development Initiatives Rider.

**ELECTRIC VEHICLE RIDER (EXPERIMENTAL)**

The Electric Vehicle Rider included in this Tariff applies to eligible customers served under this Rate Schedule. OFF-PEAK SPACE CONDITIONING AND WATER HEATING (Effective 2-28-95)

For customers served under this rate schedule, off-peak energy for storage space conditioning and/or water heating may be supplied exclusively through a separate submeter and billed separately at the rate of \$15.00 per month plus 2.90 cts. per KWH for all KWH of use, with a monthly minimum charge of \$15.00. Any billing KW resulting from usage during other than the off-peak hours is billed at Rate Schedule charges.

(I)

Service through the separate meter may be used between the off-peak hours of 7 p.m. to 7 a.m. local time, Mondays to Fridays inclusive, and all day Saturday, Sunday and the following holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

**SPECIAL BASE RATE CREDIT ADJUSTMENT**

The Special Base Rate Credit Adjustment included in this Tariff is applied to charges under this rate except for charges made under the Energy Cost Rate and charges made under the State Tax Adjustment Surcharge.

**STATE TAX ADJUSTMENT SURCHARGE**

The State Tax Adjustment Surcharge included in this Tariff is applied to charges under this rate except for charges made under the Energy Cost Rate.

**PAYMENT**

The above net rate applies when bills are paid on or before the due date specified on the bill, which is not less than 15 days from the date bill is mailed. When not so paid, the gross rate applies which is the above net rate plus 5% on the first \$200.00 of the then unpaid balance of the monthly bill and 2% on the remainder thereof.

**CONTRACT PERIOD**

Not less than one year.

(I) Indicates Increase

(C) Indicates Change

RATE SCHEDULE LP-5  
LARGE GENERAL SERVICE AT 69,000 VOLTS OR HIGHER

APPLICATION RATE SCHEDULE LP-5

This rate schedule is for large general service supplied from available lines of 69,000 volts or higher, with customer furnishing and maintaining all equipment necessary to transform the energy from the line voltage. It applies to 3 phase, 60 Hertz service. (C)

NET MONTHLY RATE (Effective 2-28-95)

\$6.00 per kilowatt for all kilowatts of the Billing KW. (C) (I)

5.60 cts. per KWH for the first 400 KWH per kilowatt of the Billing KW.

4.10 cts. per KWH for all additional KWH.

A credit of \$0.85 is applied to all Billing KW when customer takes service at 230,000 volts.

The Energy Cost Rate applies to all KWH supplied under this rate.

The Minimum Billing Demand is 300 KW.

The Net Monthly Rate Minimum is \$1,800.00. (C)

BILLING KW (I)

The Billing KW is the average number of kilowatts supplied during the 15 minute period (1 hr. period for 230,000 volt service) of maximum use during the current billing period, except that where a 1 hr. period of maximum use was in effect as of August 28, 1981 it may be continued for that customer.

Time-of-Day metering and billing is available on request for an additional charge of \$15.00 per month for a minimum period of one year. The Billing KW is the average number of kilowatts supplied during the 15 minute (1 hr.) period of maximum use during the on-peak hours of the current billing period. (I)

ON-PEAK HOURS

On-peak hours for billing purposes are 7 a.m. to 3 p.m., 8 a.m. to 4 p.m., or 9 a.m. to 5 p.m. local time, at the option of the customer, Mondays to Fridays inclusive except New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. The Company's system on-peak period is 7 a.m. to 9 p.m. local time.

OPTIONAL INTERRUPTIBLE POWER

Optional Interruptible Power is available to customers served under this rate schedule with at least 1,000 KW of year-round Interruptible Power who contract to accept interruptible service for at least one year, as detailed in this provision.

The Company will limit the amount of interruptible power to a total of 500 MW from all customers served under Rate Schedules LP-4, LP-5, LP-6, IS-1, and Interruptible Service by Agreement. For the purpose of determining this amount, interruptible power is the twelve month average of each customer's monthly Maximum On-peak Demand less the customer's contract Firm Power level. (C)

BILLING KW CREDIT (Effective 2-28-95)

The monthly Billing KW credit is calculated as:

Billing KW Credit = [Interruptible Power X Average On-peak Load Factor] x \$6.00 per KW (C) (I)

ON-PEAK HOURS

On-peak hours for billing purposes are 7 a.m. to 7 p.m. local time, Mondays to Fridays inclusive except New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

MAXIMUM ON-PEAK DEMAND

Maximum On-peak Demand is the average number of kilowatts supplied during the 15 minute period (1 hr. period for 230,000 volt service) of maximum use during the On-peak Hours of the current billing period, except that where a 1 hour period of maximum use was in effect as of August 28, 1981, it may be continued for that customer.

(Continued)

(I) Indicates Increase  
(C) Indicates Change

**RATE SCHEDULE LP-5 (CONTINUED)**

**ON-PEAK LOAD FACTOR**

On-peak Load Factor for billing purposes is the ratio of the kilowatt-hours supplied during the On-peak Hours to the product of the Maximum On-peak Demand and the number of On-peak Hours for a billing period.

**AVERAGE ON-PEAK LOAD FACTOR**

Average On-peak Load Factor is the average of the On-peak Load Factors for the twelve months of the prior calendar year. Average On-peak Load Factor is recalculated annually and applied to service billed on and after April 1 of the current year under the Optional Interruptible Power provision. The Company may modify the On-peak Load Factors for the twelve months of the prior calendar year to reflect operations expected under this provision.

**FIRM POWER**

Firm Power is the level of KW demand which the customer has no obligation to curtail during an interruption of service called by the Company. The initial level of Firm Power shall be specified in the contract. This initial level will be adjusted by the Company to the level of Firm Power actually achieved by the customer during an emergency or an emergency test interruption period. The adjusted level shall become the level of Firm Power for the remaining term of the contract or until a new level of Firm Power is achieved during a subsequent emergency or an emergency test interruption period. The level of Firm Power shall not be adjusted below the initial level of Firm Power specified in the contract.

**INTERRUPTIBLE POWER**

Interruptible Power is the Maximum On-Peak Demand less the Firm Power.

**HOURS OF INTERRUPTION**

Load interruptions may be called by the Company as required for economic load control, for system and local emergencies, and for tests of the customer's ability and readiness to interrupt load during an emergency. The frequency of load interruptions shall be no more than 20 per calendar year with such interruptions being no more than 10 hours in any one day; or more often than five days in any single month; or more than 200 hours in a calendar year. Whenever possible, the customer will be notified in advance of a probable interruption and the estimated duration of the interruption. The customer is obligated to interrupt load during emergencies and emergency tests, but has the option to interrupt, or accept an additional charge for continued use, during periods of economic load control.

The Company may cancel the contract for interruptible service if the customer fails to interrupt during an emergency or an emergency test interruption period. (C)

The charge for continued use (KWH) of interruptible load (KW) during a period of economic load control is the sum of the charges under the rate plus the Company's estimated PJM Interconnection billing rate applied to all KWH used during the interruption period.

The additional charge for not interrupting load (KW) when called for during an emergency or an emergency test interruption period is: \$25.00 per KW for all KW by which the maximum 15 minute (1 hr. for 230,000 volt service) demand (KW) for the period of requested interruption exceeds the Firm Power (KW). This penalty shall be applied separately for each requested interruption, and shall be in addition to all other charges provided for under the rate. (C) (I)

**INDUSTRIAL DEVELOPMENT INITIATIVES RIDER**

The Industrial Development Initiatives Rider included in this Tariff applies to eligible customers served under this Rate Schedule, except for customers served under the Optional Interruptible Power provision or the Economic Development Initiatives Rider.

**ECONOMIC DEVELOPMENT INITIATIVES RIDER**

The Economic Development Initiatives Rider included in this Tariff applies to eligible customers served under this Rate Schedule, except for customers served under the Optional Interruptible Power provision or the Industrial Development Initiatives Rider.

**ELECTRIC VEHICLE RIDER (EXPERIMENTAL)**

The Electric Vehicle Rider included in this Tariff applies to eligible customers served under this Rate Schedule.

**DEMAND FREE DAYS (EXPERIMENTAL)**

A customer taking service under this rate schedule having a monthly maximum demand of 5,000 KW or greater is eligible for Demand Free days. An eligible customer may pre-select three (3) weekdays per week, from Tuesday through Friday, as Demand Free. The demand created by the customer on the pre-selected days will not be used for billing purposes. The customer must specify annually which three weekdays per week will be Demand Free for the succeeding year. Terms and conditions for service under this provision are covered by contract. This provision does not apply to customers served under the Optional Interruptible Power Provision. This provision will terminate on January 1, 1998. (C)

The Company will notify the customer by 2:00 p.m. of the weekday preceding a Demand Free day if the Demand Free day is canceled. A Demand Free Day will not be canceled by the Company unless the incremental cost to carry the Company's system load is greater than the sum of the trailing block energy rate under this schedule and the Energy Cost Rate, or the local distribution system has insufficient capacity to meet the expected load.

**SPECIAL BASE RATE CREDIT ADJUSTMENT**

The Special Base Rate Credit Adjustment included in this Tariff is applied to charges under this rate except for charges made under the Energy Cost Rate and charges made under the State Tax Adjustment Surcharge.

**STATE TAX ADJUSTMENT SURCHARGE**

The State Tax Adjustment Surcharge included in this Tariff is applied to charges under this rate except for charges made under the Energy Cost Rate.

**PAYMENT**

The above net rate applies when bills are paid on or before the due date specified on the bill, which is not less than 15 days from the date bill is mailed. When not so paid, the gross rate applies which is the above net rate plus 5% on the first \$200.00 of the then unpaid balance of the monthly bill and 2% on the remainder thereof.

**CONTRACT PERIOD**

Not less than one year.

(I) Indicates Increase

(C) Indicates Change

RATE SCHEDULE IS-1  
INTERRUPTIBLE SERVICE TO GREENHOUSES

APPLICATION RATE SCHEDULE IS-1

This rate schedule is for general service at secondary voltage to greenhouses or other environmentally controlled growing facilities which use a minimum of 300 KW of interruptible lighting load as a daylight supplement.

The Company will limit the amount of interruptible power to a total of 500 MW from all customers served under Rate Schedules LP-4, LP-5, LP-6, IS-1, and Interruptible Service by Agreement. For the purpose of determining this amount, interruptible power is the twelve month average of each customer's monthly Maximum On-peak Demand less the customer's contract Firm Power level.

(C)

NET MONTHLY RATE (Effective 2-28-95)

(I)

\$360.00 per month plus  
10.90 per Billing KW

5.50 cts. per KWH for the first 730 KWH per kilowatt of Billing KW.  
3.60 cts. per KWH for all additional KWH.

The Energy Cost Rate applies to all KWH supplied under this rate.

The Net Monthly Rate Minimum is \$360.00.

BILLING KW

The Billing KW is the average number of kilowatts supplied during the 15 minute period of maximum use from 7 a.m.-3 p.m., 8 a.m.-4 p.m., or 9 a.m.-5 p.m. at the option of the customer, Monday to Friday inclusive daily during the current billing period excluding New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

LOAD INTERRUPTION

A total predetermined block of interruptible load (300 KW minimum) equivalent to 60% of the monthly maximum registered demand is to be disconnected by the customer on one-hour notice from the Company during the hours 7 a.m. to 9 p.m. as requested. Interruptions will be limited to a total of 240 hours per year.

Compliance by the customer with a request from the Company for interruption of the committed block of load is determined by the Company from recording meter records. If the customer does not comply, all recorded demands for that 24-hour day are applicable in determining the Billing KW for the billing period. If the customer does not have the interruptible load operating at the time interruption is requested, Billing KW is determined as described in the section above with no penalty.

BUDGET BILLING

(C)

Budget Billing is available at the option of the customer.

SPECIAL BASE RATE CREDIT ADJUSTMENT

The Special Base Rate Credit Adjustment included in this Tariff is applied to charges under this rate except for charges made under the Energy Cost Rate and charges made under the State Tax Adjustment Surcharge.

STATE TAX ADJUSTMENT SURCHARGE

The State Tax Adjustment Surcharge included in this Tariff is applied to charges under this rate except for charges made under the Energy Cost Rate.

PAYMENT

The above net rate applies when bills are paid on or before the due date specified on the bill, which is not less than 15 days from the date bill is mailed. When not so paid, the gross rate applies which is the above net rate plus 5% on the first \$200.00 of the then unpaid balance of the monthly bill and 2% on the remainder thereof.

CONTRACT PERIOD

Not less than one year. The Company will agree to provide this service to applicable customers for a minimum period of five years during which rate levels are subject to change.

(C) Indicates Change  
(I) Indicates Increase



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

March 3, 1995

IN REPLY PLEASE  
REFER TO OUR FILE

David MacGregor, Esquire  
Thomas Gadsden, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, PA 19103

RECEIVED  
95 MAR -6 AM 9:41  
PA. P. U. C. DIV.  
INFO. CONTROL DIV.

Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271

Dear Sirs:

Enclosed please find four (4) copies of the Office of Trial Staff's (OTS) Interrogatories numbered OTS-RE-98 through OTS-RE-103, OTS-RB-65 through OTS-RB-68 and OTS-RS-50 through OTS-RS-55 in this matter. Please restate each question before answering and start each question and answer on a separate page. Each answer must identify the person(s) responding to the question.

The answers to these interrogatories are due within fifteen (15) calendar days pursuant to 52 Pa. Code §5.342(d). Please provide four (4) copies of your responses and forward them to me P.O. Box 3265, Harrisburg, PA 17105-3265.

If you have any questions, please contact me at (717) 787-1976.

Sincerely,

*J. E. Simms* DOCUMENT FOLDER

Johnnie E. Simms  
Senior Prosecutor  
Office of Trial Staff

Enclosures  
cc: Parties of Record

PENNSYLVANIA POWER & LIGHT COMPANY  
Docket No. R-00943271

INTERROGATORIES

Analyst: T. Weakley  
S. Reed

OTS-RE-98 Reference PP&L's response to OTS-RE-1-D and provide the budgeted number of employees from September 1992 through September 1993.

OTS-RE-99 Reference PP&L's responses to OCA-Set IV-58 and OCA-Set IV-59 and provide an explanation for January, 1995 of why the actual wages exceeded the budget.

OTS-RE-100 Reference PP&L's response to OTS-RE-70-D and provide a revised copy of the budget manual which includes all pages.

OTS-RE-101 Reference Attachment 11-D-1b, Page 2 of 4.

Account	9/30/95	9/30/94
Rents	\$35,070	\$28,509
Printing & Office Supplies	9,070	5,959

- a. Provide an itemized breakdown of the expenses for each year.
- b. Explain how the test year claims were developed.
- c. Identify all factors supporting the increases.
- d. Provide the amount deferred during the historic year for computer equipment and the reasons for the deferral. When was computer equipment purchased? What is the expected life of the computer hardware?

DOCUMENT  
FOLDER

DOCKETED  
MAR 17 1995

- e. For account Printing & Office Supplies, provide the following data:
  - 1. When was the computer software purchased?
  - 2. When did the need arise for the additional software and how will it be used?
  - 3. Provide the amount of expense and expected life of the computer software.

OTS-RE-102 Reference the Company's response to OTS-RE-43-D. Provide the information as shown on Attachments 1 and 2 by rate schedule.

OTS-RE-103 Reference the Company's response to OTS-RE-40-D, Part B. Provide the figure used in preparing the budget revenue figure for the years ended September 30, 1991 through September 30, 1993 for the following categories:

- a.
  - 1. PP&L new dwelling units
  - 2. EHH average use
  - 3. GRS average use
  - 4. EHH customer
  - 5. GRS customer
  - 6. EHH market share
- b. All assumptions, factors or studies performed or employed that results in the Company concluding that EHH average use per customer would drop by 139 KWH from 1994 to 1995.

**PENNSYLVANIA POWER & LIGHT COMPANY  
R-943271**

**INTERROGATORIES**

**Engineers: Joe Sivulich  
Darren Gill**

**Note:** If PP&L references the answer of another party's interrogatory for the answer to an OTS interrogatory, please provide the other party's question and answer.

**OTS-RB-65** Provide the PJM list of "plant economic dispatch loading hierarchy", which was discussed with the company at the March 1, 1995 Martins Creek plant inspection. If for any reason data cannot be supplied on a PJM wide basis, at a minimum, supply the PJM loading hierarchy of PP&L's generating units.

**OTS-RB-66** Refer to OTS-RB-64.

If there are any additional reports or studies on the subject discussed in OTS-RB-64, please supply this data.

**OTS-RB-67** It was discussed at the February 23, 1995, and March 1, 1995 plant inspections that Mr. Douglas Krall would be the individual that would possess reports and/or studies, which contain specific calculations, detailing the assertion that environmental compliance procedures on the generating units with proposed shortened life spans would eliminate the positive return in the operating margin. Please supply these reports and studies.

**OTS-RB-68** If the generating units which have proposed shorter life spans are retired at their revised 2003 dates, how would this affect the distribution of generating capacity across the PP&L service area and how would this affect sales and purchases to and from the PJM.

**PENNSYLVANIA POWER AND LIGHT COMPANY  
R-00943271**

**INTERROGATORIES**

**Engineer: Paul M. Yarolin**

**Note 1:** If the Company references the answer of another party's data request or interrogatory for the answer to an OTS data request or interrogatory, please provide the other party's question and answer.

**Note 2:** If any data concerning this filing has been provided to any other party or Commission Staff which has not been provided to the Office of Trial Staff (OTS), please provide.

**OTS-RS-50** Please refer to Exhibit Regulations 53.53 Part IV, Attachment IV-C, O. G. Kasper, page 13.

- (a) Rate Schedule LP-4 shows the billing units increasing from 387,485 per year to 829,419 per year. What is the reason for such an increase in the billing units and why has the billing KW rate been reduced from \$9.80/KW to \$6.55/KW?
- (b) Explain the purpose of the Interr. credit of -\$2,651,620, the 441,937 units at a rate of \$6.00/KW and how it relates to the revenue for LP-4 service.
- (c) How was the \$6.00/KW derived?

**OTS-RS-51** Please refer to Attachment IV-C, page 15.

- (a) Rate Schedule LP-5 shows the rate blocks being reduced from 4 blocks to 2 blocks. What is the reason for this change?
- (b) Is page 15 intended to be a summary of LP-5 services shown on pages 15, 16, 17, and 18?

- (c) Why have revenues from LP-6 been included with LP-5 revenues as shown on page 15?
- (d) Explain how LP-6 which is a proposed new service offering, has assigned units and revenue on pages 17 and 18.
- (e) What is the primary difference between LP-5 and LP-6 services?
- (f) On page 15, the calculated revenue from distribution is shown. Please explain the reason for the difference in the total proposed rate revenue of \$318,902,138 and the 1995 projected rate revenue under proposed rates of \$322,736,318.

OTS-RS-52            On page 19, Attachment IV-C, Rate LEP is listed. A 230 KV credit is shown with a value of -\$299,149. Please explain this credit.

OTS-RS-53            On page 1 of Attachment IV-C, The usage blocks for residential service has increased from 2 blocks to 3 blocks. Explain the purpose for this change.

OTS-RS-54            Using present and proposed rates, provide a comparison of typical bills for a customer using LP-4 service versus L4I service, LP-5 service versus L5I service, and Interruptible Service by Agreement versus a comparable firm service such as LP-5 (69,000 volts or >) or LP-6 (69,000 volts or >). Show the calculations for the demand charge (kw) and for each usage block (kwh).

OTS-RS-55            Provide a calculation of the Billing KW Credit for LP-5 service as shown on ninth revised page no. 28 of the Company's tariff.

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing document(s) either personally, by first class mail or by Fax, upon the persons addressed below:

David B. MacGregor, Esquire  
Thomas Gadsden, Esquire  
Anthony C. DeCusatis  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, PA 19103

Paul E. Russell, Esquire  
Pennsylvania Power & Light Company  
2 North Ninth Street  
Allentown, PA 18101-1179

Tanya McCloskey, Esquire  
Mary C. Kenney, Esquire  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

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

Dale Bridenbaugh  
MHB Technical Associates  
1723 Hamilton Avenue - Suite K  
San Jose, CA 95125

**CERTIFICATE OF SERVICE**

(Continued)

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

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

Mr. Stephen J. Baron  
J. Kennedy & Associates, Inc.  
Suite 475, 35 Glenlake Parkway  
Atlanta, GA 30328

D. Jane Drennan, Esquire  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, D.C. 20036



---

Johnnie E. Simms, Senior Prosecutor  
Office of Trial Staff  
Pennsylvania Public Utility Commission

Date: March 3, 1995  
Docket No: R-00943271



**Pennsylvania Power & Light Company**

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

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

FAX: 610/774-6726

March 3, 1995

RECEIVED  
95 MAR - 6 AM 11:45  
PA. P. U. C. DIV.  
INFO. CONTROL DIV.

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Participant:

Today, Pennsylvania Power & Light Company (PP&L) served answers to the Office of Consumer Advocate Interrogatories, Set VI numbered 1 through 6 upon the active participants in this proceeding.

The Commission's regulations, 52 Pa. Code § 5.342(d), provide that answers to interrogatories should be served on active participants. Because these answers are voluminous and may not address issues of interest to you, a copy of the answers is not being served on you today. If you wish to receive these answers, please contact me at the address or telephone number shown above and I will provide a copy to you.

Very truly yours,

Paul E. Russell

**DOCKETED**

MAR 17 1995

cc: ✓ John G. Alford, Secretary  
The Honorable Michael C. Schnierle  
Certificate of Service

**DOCUMENT  
FOLDER**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

---

Re: Docket No. R-00943271

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing letter upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**FIRST CLASS MAIL**

Mr. Gary Bootay  
6 Manor Drive  
Mechanicsburg, Pennsylvania 17055

Concerned Citizens of Schuylkill County, Inc.  
P. O. Box 37  
McAdoo, Pennsylvania 18237

Swatara Township  
599 Eisenhower Boulevard  
Harrisburg, Pennsylvania 17111-2397

Mr. Jack A. Baker  
119 West Coover Street  
Mechanicsburg, Pennsylvania 17055

Ms. Elaine Scheidler  
1130 Loop Drive  
Harrisburg, Pennsylvania 17112-2151

Mr. Harold C. Landes  
2680 Old Bethlehem Pike  
Quakertown, Pennsylvania 18951

Ms. Laura N. Hager  
224 West Walnut Street  
Lancaster, Pennsylvania 17603

Mr. & Mrs. Wallace R. Fenner  
P.O. Box 57  
Breinigsville, Pennsylvania 18031

Mr. Samuel P. Kalney  
1106 West Livingston Street  
Whitehall, Pennsylvania 18052-6920

Mr. Michael P. McLain  
RD1, Box 1299  
Moscow, Pennsylvania 18444

Ms. Linda M. Fetter  
1335 South Ninth Street  
Allentown, Pennsylvania 18103

Ms. Charlotte Rackley  
1817 Green Street  
Harrisburg, Pennsylvania 17102

Mr. & Mrs. Robert Bell  
RD 3, Box 1406  
Mifflintown, Pennsylvania 17059

Ms. Ethel Richardson  
RD 3, Box 1383  
Mifflintown, Pennsylvania 17059

Mr. Joel Guittard  
RD 4, Box 349E  
Lake Ariel, Pennsylvania 18436

Mr. Irvin M. Shaffer  
355 Steelstown Road  
Newville, Pennsylvania 17241

Mr. & Mrs. Richard Hartzell  
29 Colonial Road  
Allentown, Pennsylvania 18103

Mr. Michael L. Kitner  
162 D Street  
Carlisle, Pennsylvania 17013

Mrs. Harold K. Shields  
837 Pheasant Road  
Harrisburg, Pennsylvania 17112

Mr. Eric Epstein  
2308 Brandywine Drive  
Harrisburg, Pennsylvania 17110

Mr. Stephen Smith  
734 8th Avenue  
Bethlehem, Pennsylvania 18018

Ms. Patricia Fabisiak  
120 South Maple Street  
Mount Carmel, Pennsylvania 17851

Mr. Mark J. Modderman  
884 Hilltop Drive  
Mt. Joy, Pennsylvania 17552

Mr. J. Edward Wilson  
P. O. Box 5834  
Harrisburg, Pennsylvania 17110

Mr. James Van Lenten  
2323 Andrew Avenue  
Mount Joy, Pennsylvania 17552

Mr. Timothy J. Kokolus  
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Mr. Robert J. Guerriere  
598-1/2 Brighton Street  
Bethlehem, Pennsylvania 18015

Mr. Charles M. Todaro  
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Emmaus, Pennsylvania 18049

Gerhard and Melanie Wendt  
9124 Joyce Lane  
Hummelstown, Pennsylvania 17036

Mr. Bruce McIntosh  
208 Northampton Street  
Hellertown, Pennsylvania 18055

Mr. Victor J. Moyer  
354 Main Street  
East Greenville, Pennsylvania 18041

Mr. Paul Gatto  
1065 Lincoln Street  
Dickson City, Pennsylvania 18519

Ms. Dorothy Louise Freyman  
4135 Mink Road  
Emmaus, Pennsylvania 18049

Ms. Geraldine L. Miller  
7028 Sell Road  
Zionsville, Pennsylvania 18092

Mr. & Mrs. William Hillanbrand  
111 Lone Lane  
Allentown, Pennsylvania 18104

Mr. Kermit L. Link  
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Emmaus, Pennsylvania 18049

W. Gilbert Co  
P. O. Box 408  
Halifax, Pennsylvania 17032

Mr. Vincent Paul Angelo, Jr.  
323 Market Street  
P.O. Box 373  
Auburn, Pennsylvania 17922-0373

Agnes & Harry Baumer  
7 South Water Street, Apt. B  
Hummelstown, Pennsylvania 17036

Ms. Diane McKinley  
190 Hill Road  
Danville, Pennsylvania 17821

Mr. Andrew A. Yost  
3511 Whitney Avenue  
Easton, Pennsylvania 18045

Mr. Theodore Hartley  
RD 1, Box 99  
Turbotville, Pennsylvania 17772

Mr. & Mrs. L. G. Kessinger  
246 East Main Street  
Shiremanstown, Pennsylvania 17011

Mr. Raymond R. Mann, Sr.  
832 Canal Drive  
Pine Grove, Pennsylvania 17963

Mrs. Regina F. Weaver  
225 West Diamond Street  
Souderton, Pennsylvania 18964

Charles & Francine Bory  
P.O. Box 134, Colony Cove South  
Tafton, Pennsylvania 18464

Ms. Kay F. Cooper  
RD #2, Box 662  
Cooper Road  
Schuylkill Haven, Pennsylvania 17972

Paul T. & Doris J. Sadownik  
HC1, Box 2480  
Tafton, Pennsylvania 18464

Mr. Ron Stepanchick  
332 Harvest Drive  
Lititz, Pennsylvania 17543

Mr. Charles E. Esterbrook  
45 Park Street  
Akron, Pennsylvania 17501

Mr. Frank Oese, Sr.  
2131 Reading Boulevard  
West Lawn, Pennsylvania 19609

Ms. Margaret M. McLaughlin  
2143 Reading Boulevard  
(West Wyomissing)  
Reading, Pennsylvania 19609

Mr. Andrew J. Nat, Jr.  
564 Winter Street  
Old Forge, Pennsylvania 18518

Mr. Peter Hudec  
1070 Allentown Road  
Green Lane, Pennsylvania 18054

Mr. Joseph M. Kirsch, Jr.  
641 Mirlosh Court  
Red Hill, Pennsylvania 18076

Erika & John Vastyan  
541 Orchard Road  
Manheim, Pennsylvania 17545

Mr. Edward F. Glose  
145 Weaver Road  
Lancaster, Pennsylvania 17603-9710

Mr. George Hirschhorn  
3891 Hawthorne Drive  
Center Valley, Pennsylvania 18034

Ms. Pauline Fogel  
RD #2, Box 56  
Palmerton, Pennsylvania 18071

Mr. & Mrs. Fred D. Hrubenak, Sr.  
1833 Snyder Street  
Bethlehem, Pennsylvania 18017

Mr. Robert S. Reph  
1090 Catherine Drive  
Coplay, Pennsylvania 18037

Ms. Melanie A. Goldberg  
378 Bridge Valley Road  
Pequea, Pennsylvania 17565

Mr. Brian Huber  
12 North 8th Street  
Shamokin, Pennsylvania 17872

Edward & Norma Lamp  
RD 3, Box 583A  
Kunkletown, Pennsylvania 18058

Mr. Gerald W. Gilbert, Jr.  
2016 Randall Road  
Enola, Pennsylvania 17025

Ms. Lucy Salerno  
2863 Truman Drive  
Hatfield, Pennsylvania 19440

Kline Township Board of Supervisors  
RR Fifth Street  
Kelayres, Pennsylvania 18231

Mr. Mark Craig Messics  
1117 Grove Drive  
Orefield, Pennsylvania 18069

Ms. Helen A. Loper  
422 North Second Street  
Allentown, Pennsylvania 18102-3102

Ms. Anna E. Foster  
59 Shenks Ferry Road  
Conestoga, Pennsylvania 17561

William Helm & Sandra Holoman  
RR3, Box 26A  
Benton, Pennsylvania 17814

Mr. Aruthur W. Lockner  
120 Linfield Circle  
Macungie, Pennsylvania 18062

W. J. Sellers  
6444 Larch Lane  
Macungie, Pennsylvania 18062

Beverly Winder  
460 E. Central Avenue  
S. Williamsport, Pennsylvania 17701

Stephanie A. Crayton  
460 E. Central Avenue  
S. Williamsport, Pennsylvania 17701

Wilfred & Finita Fontaine  
90-11 Northern Blvd.  
Jackson Heights, New York 11372

Thomas A. Bodack  
834 S. Hays Street  
Allentown, Pennsylvania 18103

Sandra Christman  
RD #2, Box 60-1  
Palmerton, Pennsylvania 18071

Erika Latsch  
Walnutport Mobile Park  
Walnutport, Pennsylvania 18088

Harvey & Marjorie Kichline  
2663 Oakhurst Drive  
Center Valley, Pennsylvania 18034

Maynard E. Adams  
259 W. 28th Div. Highway  
Lititz, Pennsylvania 17543

Diane M. Coyle  
4531 Park View Drive  
Schnecksville, Pennsylvania 18078

Karen Phillips  
443 5th Street  
Whitehall, Pennsylvania 18052

Chris Charron  
Box 283-B, David Road  
Honeybrook, Pennsylvania 19344

Mr. Melvin E. & Patricia M. Miller, Jr.  
1637 W. Linden Street  
Allentown, Pennsylvania 18102

Janet Miller  
1713 S. Hall Street  
Allentown, Pennsylvania 18103

Bronwen K. Zitrides  
1116 Meadowbrook CW  
Allentown, Pennsylvania 18103

Michelle Scott  
36 N. 20th Street  
Harrisburg, Pennsylvania 17103

  
Paul E. Russell

Dated: March 3, 1995  
at Allentown, Pennsylvania



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

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

FAX: 610/774-6726

March 3, 1995

RECEIVED  
95 MAR -6 AM 11:45  
PA. P. U. C.  
INFO. CONTROL DIV.

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Mr. Alford:

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 individual listed on the attached Certificate of Service.

If you have any questions regarding this matter, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Michael C. Schrierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

---

Re: Docket No. R-00943271

**CERTIFICATE 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 I numbered 2, 3, 4, 13, 22, 37, 39 and 43 upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**HAND DELIVERED**

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

Bernard A. Ryan, Jr., Esquire  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101

**DOCKETED**  
MAR 17 1995

**DOCUMENT  
FOLDER**

Johnnie E. Simms, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

David M. Kleppinger, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, Pennsylvania 17108

**OVERNIGHT MAIL**

D. Jane Drennan, Esquire  
Sarah E. Tomalty, Esquire  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, DC 20036

David A. McCormick, Esquire  
Department of the Army  
Office of the Judge Advocate General  
901 North Stuart Street  
Arlington, Virginia 22203-1837

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

Thomas S. Catlin  
Exeter Associates, Inc.  
12510 Prosperity Drive  
Suite 350  
Silver Spring, Maryland 20904

Stephen J. Baron, President  
J. Kennedy and Associates, Inc.  
Suite 475  
35 Glenlake Parkway  
Atlanta, Georgia 30328

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

Mr. Maurice Brubaker  
Drazen-Brubaker & Associates, Inc.  
7730 Forsyth Boulevard, Suite 200  
St. Louis, Missouri 63105-1819

Alan J. Barak (attorney for Sierra Club)  
Mid-Atlantic Energy Project  
3700 Vartan Way  
Harrisburg, Pennsylvania 17110

  
Paul E. Russell

Dated: March 3, 1995  
at Allentown, Pennsylvania



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 3, 1995

RECEIVED  
95 MAR - 6 AM 11:45  
PA. P. U. C.  
INFO. CONTROL DIV.

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Mr. Alford:

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 matter, please call.

Very truly yours,

Paul E. Russell

**DOCUMENT  
FOLDER**

Attachment

cc: The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

**CERTIFICATE 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 VI numbered 1 through 6 upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**HAND DELIVERED**

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

Bernard A. Ryan, Jr., Esquire  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101

**DOCKETED**  
MAR 17 1995

**DOCUMENT  
FOLDER**

Johnnie E. Simms, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

David M. Kleppinger, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, Pennsylvania 17108

**OVERNIGHT MAIL**

D. Jane Drennan, Esquire  
Sarah E. Tomalty, Esquire  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, DC 20036

David A. McCormick, Esquire  
Department of the Army  
Office of the Judge Advocate General  
901 North Stuart Street  
Arlington, Virginia 22203-1837

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

Thomas S. Catlin  
Exeter Associates, Inc.  
12510 Prosperity Drive  
Suite 350  
Silver Spring, Maryland 20904

Stephen J. Baron, President  
J. Kennedy and Associates, Inc.  
Suite 475  
35 Glenlake Parkway  
Atlanta, Georgia 30328

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

Mr. Maurice Brubaker  
Drazen-Brubaker & Associates, Inc.  
7730 Forsyth Boulevard, Suite 200  
St. Louis, Missouri 63105-1819

Alan J. Barak (attorney for Sierra Club)  
Mid-Atlantic Energy Project  
3700 Vartan Way  
Harrisburg, Pennsylvania 17110

  
Paul E. Russell

Dated: March 3, 1995  
at Allentown, Pennsylvania



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 3, 1995

RECEIVED  
95 MAR -6 AM 11:45  
PA. P. U. C. DIV.  
INFO. CONTROL DIV.

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Mr. Alford:

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 matter, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Michael C. Schnierle

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

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I hereby certify that I have this day served a true copy of  
Pennsylvania Power & Light Company's answers to the Office of Trial Staff's  
Interrogatories numbered OTS-RE-83 through OTS-RE-97 upon the active  
participants listed below, in accordance with the requirements of § 1.54  
(relating to service by a participant):

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Office of Consumer Advocate  
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Harrisburg, Pennsylvania 17105-3265

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**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

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

FAX: 610/774-6726

March 3, 1995

RECEIVED  
95 MAR -6 AM 11:45  
PA. P.U.C.  
INFO. CONTROL DIV.

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Participant:

Today, Pennsylvania Power & Light Company (PP&L) served answers to the Office of Consumer Advocate's Interrogatories, Set V numbered 37 upon the active participants in this proceeding.

The Commission's regulations, 52 Pa. Code § 5.342(d), provide that answers to interrogatories should be served on active participants. Because these answers are voluminous and may not address issues of interest to you, a copy of the answers is not being served on you today. If you wish to receive these answers, please contact me at the address or telephone number shown above and I will provide a copy to you.

Very truly yours,

Paul E. Russell

DOCUMENT  
OLDER

cc: John G. Alford, Secretary  
The Honorable Michael C. Schrierle  
Certificate of Service

DOCKETED

MAR 17 1995

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Re: Docket No. R-00943271

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing letter upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**FIRST CLASS MAIL**

Mr. Gary Bootay  
6 Manor Drive  
Mechanicsburg, Pennsylvania 17055

Concerned Citizens of Schuylkill County, Inc.  
P. O. Box 37  
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Swatara Township  
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2131 Reading Boulevard  
West Lawn, Pennsylvania 19609

Ms. Margaret M. McLaughlin  
2143 Reading Boulevard  
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Reading, Pennsylvania 19609

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Red Hill, Pennsylvania 18076

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Manheim, Pennsylvania 17545

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Center Valley, Pennsylvania 18034

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William Helm & Sandra Holoman  
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W. J. Sellers  
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S. Williamsport, Pennsylvania 17701

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Karen Phillips  
443 5th Street  
Whitehall, Pennsylvania 18052

Chris Charron  
Box 283-B, David Road  
Honeybrook, Pennsylvania 19344

Mr. Melvin E. & Patricia M. Miller, Jr.  
1637 W. Linden Street  
Allentown, Pennsylvania 18102

Janet Miller  
1713 S. Hall Street  
Allentown, Pennsylvania 18103

Bronwen K. Zitrides  
1116 Meadowbrook CW  
Allentown, Pennsylvania 18103

Michelle Scott  
36 N. 20th Street  
Harrisburg, Pennsylvania 17103

  
Paul E. Russell

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FAX: 610/774-6726

March 3, 1995

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Allentown, Pennsylvania 18102-3102

Ms. Anna E. Foster  
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Conestoga, Pennsylvania 17561

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Stephanie A. Crayton  
460 E. Central Avenue  
S. Williamsport, Pennsylvania 17701

Wilfred & Finita Fontaine  
90-11 Northern Blvd.  
Jackson Heights, New York 11372

Thomas A. Bodack  
834 S. Hays Street  
Allentown, Pennsylvania 18103

Sandra Christman  
RD #2, Box 60-1  
Palmerton, Pennsylvania 18071

Erika Latsch  
Walnutport Mobile Park  
Walnutport, Pennsylvania 18088

Harvey & Marjorie Kichline  
2663 Oakhurst Drive  
Center Valley, Pennsylvania 18034

Maynard E. Adams  
259 W. 28th Div. Highway  
Lititz, Pennsylvania 17543

Diane M. Coyle  
4531 Park View Drive  
Schnecksville, Pennsylvania 18078

Karen Phillips  
443 5th Street  
Whitehall, Pennsylvania 18052

Chris Charron  
Box 283-B, David Road  
Honeybrook, Pennsylvania 19344

Mr. Melvin E. & Patricia M. Miller, Jr.  
1637 W. Linden Street  
Allentown, Pennsylvania 18102

Janet Miller  
1713 S. Hall Street  
Allentown, Pennsylvania 18103

Bronwen K. Zitrides  
1116 Meadowbrook CW  
Allentown, Pennsylvania 18103

Michelle Scott  
36 N. 20th Street  
Harrisburg, Pennsylvania 17103

  
Paul E. Russell

Dated: March 3, 1995  
at Allentown, Pennsylvania



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 3, 1995

RECEIVED  
95 MAR -6 AM 11:45  
PA. P. U. C.  
INFO. CONTROL DIV.

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

**Re: Pennsylvania Public Utility Commission**  
**v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271**

Dear Mr. Alford:

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 individual listed on the attached Certificate of Service.

If you have any questions regarding this matter, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

**CERTIFICATE 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 Trial Staff's  
Interrogatories numbered OTS-RE-78 through OTS-RE-82 and OTS-RR-1  
through OTS-RR-5 upon the individual listed below, in accordance with the  
requirements of § 1.54 (relating to service by a participant):

W. Gilbert Co  
P. O. Box 408  
Halifax, Pennsylvania 17032

*Paul E. Russell*  
Paul E. Russell  
DOCKETED  
MAR 17 1995

Dated: March 3, 1995  
at Allentown, Pennsylvania

DOCUMENT  
FOLDER  
- 1 -



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

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

FAX: 610/774-6726

March 3, 1995

RECEIVED  
95 MAR -6 AM 11:45  
PA. P.U.C.  
INFO. CONTROL DIV.

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Participant:

Today, Pennsylvania Power & Light Company (PP&L) served answers to the Office of Consumer Advocate's Interrogatories, Set I numbered 2, 3, 4, 13, 22, 37, 39 and 43 upon the active participants in this proceeding.

The Commission's regulations, 52 Pa. Code § 5.342(d), provide that answers to interrogatories should be served on active participants. Because these answers are voluminous and may not address issues of interest to you, a copy of the answers is not being served on you today. If you wish to receive these answers, please contact me at the address or telephone number shown above and I will provide a copy to you.

Very truly yours,

Paul E. Russell

**DOCKETED**  
MAR 17 1995

cc: ✓ John G. Alford, Secretary  
The Honorable Michael C. Schnierle  
Certificate of Service

**DOCUMENT  
FOLDER**

3-6  
19

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing letter upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**FIRST CLASS MAIL**

Mr. Gary Bootay  
6 Manor Drive  
Mechanicsburg, Pennsylvania 17055

Concerned Citizens of Schuylkill County, Inc.  
P. O. Box 37  
McAdoo, Pennsylvania 18237

Swatara Township  
599 Eisenhower Boulevard  
Harrisburg, Pennsylvania 17111-2397

Mr. Jack A. Baker  
119 West Coover Street  
Mechanicsburg, Pennsylvania 17055

Ms. Elaine Scheidler  
1130 Loop Drive  
Harrisburg, Pennsylvania 17112-2151

Mr. Harold C. Landes  
2680 Old Bethlehem Pike  
Quakertown, Pennsylvania 18951

Ms. Laura N. Hager  
224 West Walnut Street  
Lancaster, Pennsylvania 17603

Mr. & Mrs. Wallace R. Fenner  
P.O. Box 57  
Breinigsville, Pennsylvania 18031

Mr. Samuel P. Kalney  
1106 West Livingston Street  
Whitehall, Pennsylvania 18052-6920

Mr. Michael P. McLain  
RD1, Box 1299  
Moscow, Pennsylvania 18444

Ms. Linda M. Fetter  
1335 South Ninth Street  
Allentown, Pennsylvania 18103

Ms. Charlotte Rackley  
1817 Green Street  
Harrisburg, Pennsylvania 17102

Mr. & Mrs. Robert Bell  
RD 3, Box 1406  
Mifflintown, Pennsylvania 17059

Ms. Ethel Richardson  
RD 3, Box 1383  
Mifflintown, Pennsylvania 17059

Mr. Joel Guittard  
RD 4, Box 349E  
Lake Ariel, Pennsylvania 18436

Mr. Irvin M. Shaffer  
355 Steelstown Road  
Newville, Pennsylvania 17241

Mr. & Mrs. Richard Hartzell  
29 Colonial Road  
Allentown, Pennsylvania 18103

Mr. Michael L. Kitner  
162 D Street  
Carlisle, Pennsylvania 17013

Mrs. Harold K. Shields  
837 Pheasant Road  
Harrisburg, Pennsylvania 17112

Mr. Eric Epstein  
2308 Brandywine Drive  
Harrisburg, Pennsylvania 17110

Mr. Stephen Smith  
734 8th Avenue  
Bethlehem, Pennsylvania 18018

Ms. Patricia Fabisiak  
120 South Maple Street  
Mount Carmel, Pennsylvania 17851

Mr. Mark J. Modderman  
884 Hilltop Drive  
Mt. Joy, Pennsylvania 17552

Mr. J. Edward Wilson  
P. O. Box 5834  
Harrisburg, Pennsylvania 17110

Mr. James Van Lenten  
2323 Andrew Avenue  
Mount Joy, Pennsylvania 17552

Mr. Timothy J. Kokolus  
628 East Lane  
Orefield, Pennsylvania 18069

Mr. Robert J. Guerriere  
598-1/2 Brighton Street  
Bethlehem, Pennsylvania 18015

Mr. Charles M. Todaro  
1250 W. Jubilee Street  
Emmaus, Pennsylvania 18049

Gerhard and Melanie Wendt  
9124 Joyce Lane  
Hummelstown, Pennsylvania 17036

Mr. Bruce McIntosh  
208 Northampton Street  
Hellertown, Pennsylvania 18055

Mr. Victor J. Moyer  
354 Main Street  
East Greenville, Pennsylvania 18041

Mr. Paul Gatto  
1065 Lincoln Street  
Dickson City, Pennsylvania 18519

Ms. Dorothy Louise Freyman  
4135 Mink Road  
Emmaus, Pennsylvania 18049

Ms. Geraldine L. Miller  
7028 Sell Road  
Zionsville, Pennsylvania 18092

Mr. & Mrs. William Hillanbrand  
111 Lone Lane  
Allentown, Pennsylvania 18104

Mr. Kermit L. Link  
4135 Mink Road  
Emmaus, Pennsylvania 18049

W. Gilbert Co  
P. O. Box 408  
Halifax, Pennsylvania 17032

Mr. Vincent Paul Angelo, Jr.  
323 Market Street  
P.O. Box 373  
Auburn, Pennsylvania 17922-0373

Agnes & Harry Baumer  
7 South Water Street, Apt. B  
Hummelstown, Pennsylvania 17036

Ms. Diane McKinley  
190 Hill Road  
Danville, Pennsylvania 17821

Mr. Andrew A. Yost  
3511 Whitney Avenue  
Easton, Pennsylvania 18045

Mr. Theodore Hartley  
RD 1, Box 99  
Turbotville, Pennsylvania 17772

Mr. & Mrs. L. G. Kessinger  
246 East Main Street  
Shiremanstown, Pennsylvania 17011

Mr. Raymond R. Mann, Sr.  
832 Canal Drive  
Pine Grove, Pennsylvania 17963

Mrs. Regina F. Weaver  
225 West Diamond Street  
Souderton, Pennsylvania 18964

Charles & Francine Bory  
P.O. Box 134, Colony Cove South  
Tafton, Pennsylvania 18464

Ms. Kay F. Cooper  
RD #2, Box 662  
Cooper Road  
Schuylkill Haven, Pennsylvania 17972

Paul T. & Doris J. Sadownik  
HC1, Box 2480  
Tafton, Pennsylvania 18464

Mr. Ron Stepanchick  
332 Harvest Drive  
Lititz, Pennsylvania 17543

Mr. Charles E. Esterbrook  
45 Park Street  
Akron, Pennsylvania 17501

Mr. Frank Oese, Sr.  
2131 Reading Boulevard  
West Lawn, Pennsylvania 19609

Ms. Margaret M. McLaughlin  
2143 Reading Boulevard  
(West Wyomissing)  
Reading, Pennsylvania 19609

Mr. Andrew J. Nat, Jr.  
564 Winter Street  
Old Forge, Pennsylvania 18518

Mr. Peter Hudec  
1070 Allentown Road  
Green Lane, Pennsylvania 18054

Mr. Joseph M. Kirsch, Jr.  
641 Mirlosh Court  
Red Hill, Pennsylvania 18076

Erika & John Vastyan  
541 Orchard Road  
Manheim, Pennsylvania 17545

Mr. Edward F. Glose  
145 Weaver Road  
Lancaster, Pennsylvania 17603-9710

Mr. George Hirschhorn  
3891 Hawthorne Drive  
Center Valley, Pennsylvania 18034

Ms. Pauline Fogel  
RD #2, Box 56  
Palmerton, Pennsylvania 18071

Mr. & Mrs. Fred D. Hrubenak, Sr.  
1833 Snyder Street  
Bethlehem, Pennsylvania 18017

Mr. Robert S. Reph  
1090 Catherine Drive  
Coplay, Pennsylvania 18037

Ms. Melanie A. Goldberg  
378 Bridge Valley Road  
Pequea, Pennsylvania 17565

Mr. Brian Huber  
12 North 8th Street  
Shamokin, Pennsylvania 17872

Edward & Norma Lamp  
RD 3, Box 583A  
Kunkletown, Pennsylvania 18058

Mr. Gerald W. Gilbert, Jr.  
2016 Randall Road  
Enola, Pennsylvania 17025

Ms. Lucy Salerno  
2863 Truman Drive  
Hatfield, Pennsylvania 19440

Kline Township Board of Supervisors  
RR Fifth Street  
Kelayres, Pennsylvania 18231

Mr. Mark Craig Messics  
1117 Grove Drive  
Orefield, Pennsylvania 18069

Ms. Helen A. Loper  
422 North Second Street  
Allentown, Pennsylvania 18102-3102

Ms. Anna E. Foster  
59 Shenks Ferry Road  
Conestoga, Pennsylvania 17561

William Helm & Sandra Holoman  
RR3, Box 26A  
Benton, Pennsylvania 17814

Mr. Aruthur W. Lockner  
120 Linfield Circle  
Macungie, Pennsylvania 18062

W. J. Sellers  
6444 Larch Lane  
Macungie, Pennsylvania 18062

Beverly Winder  
460 E. Central Avenue  
S. Williamsport, Pennsylvania 17701

Stephanie A. Crayton  
460 E. Central Avenue  
S. Williamsport, Pennsylvania 17701

Wilfred & Finita Fontaine  
90-11 Northern Blvd.  
Jackson Heights, New York 11372

Thomas A. Bodack  
834 S. Hays Street  
Allentown, Pennsylvania 18103

Sandra Christman  
RD #2, Box 60-1  
Palmerton, Pennsylvania 18071

Erika Latsch  
Walnutport Mobile Park  
Walnutport, Pennsylvania 18088

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Center Valley, Pennsylvania 18034

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Schnecksville, Pennsylvania 18078

Karen Phillips  
443 5th Street  
Whitehall, Pennsylvania 18052

Chris Charron  
Box 283-B, David Road  
Honeybrook, Pennsylvania 19344

Mr. Melvin E. & Patricia M. Miller, Jr.  
1637 W. Linden Street  
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Janet Miller  
1713 S. Hall Street  
Allentown, Pennsylvania 18103

Bronwen K. Zitrides  
1116 Meadowbrook CW  
Allentown, Pennsylvania 18103

Michelle Scott  
36 N. 20th Street  
Harrisburg, Pennsylvania 17103

  
Paul E. Russell

Dated: March 3, 1995  
at Allentown, Pennsylvania

# Commission on Economic Opportunity

KJR  
211 SOUTH MAIN STREET  
WILKES-BARRE, PA 18701-1596  
(717) 826-0510  
1-(800) 822-0359  
FAX No.: (717) 829-1665

R-00943271

March 6, 1995

Judge Michael Schnierle  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
P.O. Box 3265  
Harrisburg, PA 17105-3265

DOCKETED  
MAR 24 1995

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95 MAR -9 PM 2:40  
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RE: Prehearing Memorandum

Dear Judge Schnierle:

The Commission on Economic Opportunity wishes to be an active participant in the PP&L rate case. We intend to address three issues. The first is that PP&L's proposed rate increase falls disproportionately on residential ratepayers, in general, and low income ratepayers, in particular. Secondly, PP&L residential demand side management programs, as proposed, are designed to attract new customers and do little if anything to reduce the energy burden of existing ratepayers. In particular, they do little to help low income elderly, disabled, and families with children. Finally, current PP&L's Low Income Usage Reduction Program targets electric heat and electric water heat customers and not low income electric baseload customers.

Therefore, the Commission on Economic Opportunity believes that the approval of any rate increase should be contingent upon an increase in residential energy conservation and energy education spending that targets existing ratepayers, in general, and the development of new low income baseload reduction programs, in particular.

In support of these issues, we intend to present evidence and testimony from witnesses with following areas of expertise:

- Low Income Issues
- Elderly Issues
- Handicapped Issues

- Demand Side Management Issues on the National level, on the State Level, and on the Company level
- Customer Assistance Programs on the National level, on the State Level, and on the Company level
- Pennsylvania Low Income Usage Reduction Program on the State Level, and on the Company level

Please contact me with any questions or clarifications required.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eugene M. Brady".

Eugene M. Brady  
Executive Director



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

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

FAX: 610/774-6726

March 6, 1995

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

DOCUMENT  
FOLDER

RECEIVED  
95 MAR -8 AM 9:18  
PA. P.U.C.  
INFO. CONTROL DIV.

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Mr. Alford:

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 individual listed on the attached Certificate of Service.

If you have any questions regarding this matter, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

**CERTIFICATE 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 Small  
Business Advocate's Interrogatories numbered 1 through 41 upon the active  
participants listed below, in accordance with the requirements of § 1.54  
(relating to service by a participant):

**HAND DELIVERED**

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

Bernard A. Ryan, Jr., Esquire  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101

Johnnie E. Simms, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

DOCUMENT  
FOLDER

DOCKETED  
MAR 08 1995

David M. Kleppinger, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, Pennsylvania 17108

**OVERNIGHT MAIL**

D. Jane Drennan, Esquire  
Sarah E. Tomalty, Esquire  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, DC 20036

David A. McCormick, Esquire  
Department of the Army  
Office of the Judge Advocate General  
901 North Stuart Street  
Arlington, Virginia 22203-1837

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

Thomas S. Catlin  
Exeter Associates, Inc.  
12510 Prosperity Drive  
Suite 350  
Silver Spring, Maryland 20904

Stephen J. Baron, President  
J. Kennedy and Associates, Inc.  
Suite 475  
35 Glenlake Parkway  
Atlanta, Georgia 30328

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

Mr. Maurice Brubaker  
Drazen-Brubaker & Associates, Inc.  
7730 Forsyth Boulevard, Suite 200  
St. Louis, Missouri 63105-1819

Alan J. Barak (attorney for Sierra Club)  
Mid-Atlantic Energy Project  
3700 Vartan Way  
Harrisburg, Pennsylvania 17110

  
\_\_\_\_\_  
Paul E. Russell

Dated: March 6, 1995  
at Allentown, Pennsylvania



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

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

FAX: 610/774-6726

March 6, 1995

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PA. P.U.C. DIV.  
INFO. CONTROL DIV.

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

DOCUMENT  
FOLDER

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Mr. Alford:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying revised answers to interrogatories that Pennsylvania Power & Light Company served today on the individual listed on the attached Certificate of Service.

If you have any questions regarding this matter, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Michael C. Schnierle

16

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

**CERTIFICATE OF SERVICE**

DOCUMENT  
FOLDER

I hereby certify that I have this day served a true copy of  
Pennsylvania Power & Light Company's revised answers to the Office of  
Consumer Advocate's Interrogatories, Set I numbered 11 and 19, Set III  
numbered 29, and Set V numbered 49 upon the active participants listed  
below, in accordance with the requirements of § 1.54 (relating to service by a  
participant):

**HAND DELIVERED**

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

Bernard A. Ryan, Jr., Esquire  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101

**DOCKETED**  
MAR 08 1995

Johnnie E. Simms, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

David M. Kleppinger, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, Pennsylvania 17108

**OVERNIGHT MAIL**

D. Jane Drennan, Esquire  
Sarah E. Tomalty, Esquire  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, DC 20036

David A. McCormick, Esquire  
Department of the Army  
Office of the Judge Advocate General  
901 North Stuart Street  
Arlington, Virginia 22203-1837

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

Thomas S. Catlin  
Exeter Associates, Inc.  
12510 Prosperity Drive  
Suite 350  
Silver Spring, Maryland 20904

Stephen J. Baron, President  
J. Kennedy and Associates, Inc.  
Suite 475  
35 Glenlake Parkway  
Atlanta, Georgia 30328

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

Mr. Maurice Brubaker  
Drazen-Brubaker & Associates, Inc.  
7730 Forsyth Boulevard, Suite 200  
St. Louis, Missouri 63105-1819

Alan J. Barak (attorney for Sierra Club)  
Mid-Atlantic Energy Project  
3700 Vartan Way  
Harrisburg, Pennsylvania 17110

  
Paul E. Russell

Dated: March 6, 1995  
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

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

FAX: 610/774-6726

DOCUMENT  
FOLDER

March 6, 1995

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PA. P. U. C.  
INFO. CONTROL DIV.

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Re: **Pennsylvania Public Utility Commission**  
**v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271**

Dear Mr. Alford:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying revised answers to interrogatories that Pennsylvania Power & Light Company served today on the individual listed on the attached Certificate of Service.

If you have any questions regarding this matter, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of  
Pennsylvania Power & Light Company's revised answers to the Pennsylvania  
Power & Light Industrial Consumer Alliance's Interrogatories, Set I numbered  
19 and 24 upon the active participants listed below, in accordance with the  
requirements of § 1.54 (relating to service by a participant):

**HAND DELIVERED**

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

Bernard A. Ryan, Jr., Esquire  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101

DOCUMENT  
FOLDER

**DOCKETED**  
MAR 08 1995

Johnnie E. Simms, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

David M. Kleppinger, Esquire  
McNees, Wallace & Nurick  
P. O. Box 1166  
100 Pine Street  
Harrisburg, Pennsylvania 17108

**OVERNIGHT MAIL**

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Sarah E. Tomalty, Esquire  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, DC 20036

David A. McCormick, Esquire  
Department of the Army  
Office of the Judge Advocate General  
901 North Stuart Street  
Arlington, Virginia 22203-1837

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

Thomas S. Catlin  
Exeter Associates, Inc.  
12510 Prosperity Drive  
Suite 350  
Silver Spring, Maryland 20904

Stephen J. Baron, President  
J. Kennedy and Associates, Inc.  
Suite 475  
35 Glenlake Parkway  
Atlanta, Georgia 30328

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

Mr. Maurice Brubaker  
Drazen-Brubaker & Associates, Inc.  
7730 Forsyth Boulevard, Suite 200  
St. Louis, Missouri 63105-1819

Alan J. Barak (attorney for Sierra Club)  
Mid-Atlantic Energy Project  
3700 Vartan Way  
Harrisburg, Pennsylvania 17110

  
Paul E. Russell

Dated: March 6, 1995  
at Allentown, Pennsylvania



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

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

FAX: 610/774-6726

March 6, 1995

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

DOCUMENT  
FOLDER

RECEIVED  
95 MAR -8 AM 9:18  
PA. P. U. C.  
INFO. CONTROL DIV.

**Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271**

Dear Mr. Alford:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying revised answers to interrogatories that Pennsylvania Power & Light Company served today on the individual listed on the attached Certificate of Service.

If you have any questions regarding this matter, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's revised answers to the Office of Trial Staff's Interrogatories numbered OTS-RE-5D, OTS-RE-36D, OTS-RE-58D, OTS-RE-70D, OTS-RB-52, and OTS-RB-56 upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**HAND DELIVERED**

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

Bernard A. Ryan, Jr., Esquire  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101

DOCUMENT  
FOLDER

DOCKETED  
MAR 08 1995

Johnnie E. Simms, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

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