

ORIGINAL

MORGAN, LEWIS & BOCKIUS

COUNSELORS AT LAW

2000 ONE LOGAN SQUARE

PHILADELPHIA, PENNSYLVANIA 19103-6993

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NEW YORK

MIAMI

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BRUSSELS

WASHINGTON

LOS ANGELES *KJR*

HARRISBURG

LONDON

FRANKFURT

TOKYO

ANTHONY C. DECUSATIS

DIAL DIRECT (215) 963-5034

February 9, 1995

RECEIVED
95 FEB 10 AM 10:18
PA. P. U. C. DIV.
INFO. CONTROL DIV.

VIA FIRST CLASS MAIL

John G. Alford, Secretary
Pennsylvania Public Utility Commission
North Office Building
New Filing Section, Room B-18
Commonwealth and North Streets
Harrisburg, PA 17120

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

Dear Secretary Alford:

Enclosed please find an original and three copies of Pennsylvania Power & Light Company's Objection to Office of Trial Staff ("OCA") Interrogatory Set I, No. 6. As evidenced by the attached Certificate of Service, copies of the enclosed Objection have been served on all parties of record and upon the Administrative Law Judge.

Very truly yours,
Anthony C. DeCusatis
Anthony C. DeCusatis
Counsel for Pennsylvania
Power & Light Company

ACD:lms
Enclosures

cc: Per Attached Certificate of Service
Hon. Michael Schnierle, Adm. Law Judge

DOCUMENT
FOLIO

ORIGINAL

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, et al.

v.

PENNSYLVANIA POWER & LIGHT
COMPANY

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DOCKET NOS. R-00943271
R-00943271C001, et seq.

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

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RECEIVED

OBJECTION OF PENNSYLVANIA POWER & LIGHT COMPANY
TO OFFICE OF CONSUMER ADVOCATE
INTERROGATORY SET I, NO. 6.

Pennsylvania Power & Light Company ("PP&L" or the "Company"), pursuant to 52 Pa. Code § 5.342.(c), hereby objects to the Office of Consumer Advocate ("OCA") Interrogatory Set I, No. 6 for the reasons set forth hereafter.

1. On January 30, 1995, the OCA served upon PP&L its Interrogatory Set I containing questions numbered 1 through 48. Question No. 6 thereof states as follows:

Please provide all INPO reports (plant and corporate) for PP&L covering the period between 1/1/90 and the present.

2. The Institute for Nuclear Power Operations ("INPO") is a nonprofit corporation formed after the 1979 Three Mile Island accident to promote safety and reliability in the operation of nuclear power plants. INPO's membership includes all operators of nuclear power plants in the United States.

DOCUMENT
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DOCKETED

FEB 21 1995

Reports on nuclear plant operations compiled by INPO are distributed on a voluntary basis to INPO members and to the Nuclear Regulatory Commission ("NRC") pursuant to the explicit understanding that they are not to be disclosed to additional persons without INPO's consent. In Critical Mass Energy Project v. NRC, 975 F.2d 871 (D.C. Cir. 1992), the United States Court of Appeals held that, if disclosure of INPO reports to third parties were compelled, the ability of the NRC to fulfill its safety-related regulatory functions could be impaired. Principally for that reason, the Court concluded that INPO reports filed with the NRC could not be obtained under the Freedom of Information Act.

3. Information concerning the operation of Susquehanna Steam Electric Station that is relevant to the issues properly raised in the Company's pending rate case may be obtained by the OCA from other sources, which the OCA is already pursuing through the interrogatories issued to date. The OCA has made no showing that the INPO reports are the only source of information about PP&L's nuclear operation that is, or may be, relevant to economic regulatory issues within this Commission's jurisdiction.

4. In summary, PP&L objects to OCA Interrogatory Set I, No. 6 because it is not authorized to provide copies of, or otherwise disclose, the INPO reports to third-parties without INPO's consent; such disclosure is inconsistent with a clearly articulated Federal policy; and the OCA has not demonstrated that

the INPO reports are the only source of relevant information about PP&L's nuclear operations.

THEREFORE, for the reasons set forth above, PP&L's objection to OCA Interrogatory Set I, No. 6 should be sustained and the aforementioned interrogatory stricken.


Thomas P. Gadsden
David B. MacGregor
Anthony C. DeCusatis
Attorneys for Pennsylvania
Power & Light Company

OF COUNSEL:

MORGAN, LEWIS & BOCKIUS
2000 One Logan Square
Philadelphia, PA 19103

DATED: February 9, 1995 .

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, et al. :
 : DOCKET NOS. R-00943271
v. : R-00943271C001, et seq.
 :
PENNSYLVANIA POWER & LIGHT :
COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this 9th day of February served a true copy of the aforementioned document per the requirements of 52 Pa. Code §§1.54, and in the manner and upon the parties of record listed below:

VIA FAX AND FIRST CLASS MAIL

Tanya J. McClosky, Esq.
Mary C. Kenney, Esq.
Assistant Consumer Advocates
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

FIRST CLASS MAIL

Hon. Michael C. Schnierle
Administrative Law Judge
Pennsylvania Public Utility Commission
Room G-5, North Office Building
P.O. Box 3265
Harrisburg, PA 17120-3265

Johnnie E. Simms, Esq.
Stephen Gorka, Esq.
Kenneth L. Mickens, Esq.
PA Public Utility Commission
Office of Trial Staff
Pitnick Building - 3rd Floor
901 North 7th Street (Rear)
Harrisburg, PA 17102

James P. Dougherty, Esq.
David M. Kleppinger, Esq.
McNees, Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

PA P.U.C. v. Pennsylvania Power & Light Company
Docket Nos. R-0943271 and R-00943271C001, et seq.
page 2 of 2

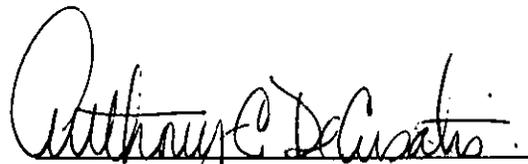
Bernard A. Ryan, Jr., Esq.
Karen Oill Moury, Esq.
Off. of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

D. Jane Drennan, Esq.
1216 16th Street Northwest
Washington, D.C. 20036

Joan O. Brandeis, Esq.
Schnader, Harrison, Segal & Louis
Suite 3600, 1600 Market Street
Philadelphia, PA 19103-4252

David A. McCormick, Esq.
Regulatory Law Office
Office of the Judge Advocate General
Department of the Army
(DAJA-RL 3848)
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

Date: February 9, 1995


Anthony C. DeCusatis
Counsel for Pennsylvania-
American Water Company



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

DOCUMENT
FOLDER

KJR

February 10, 1995

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

RECEIVED
95 FEB 13 AM 9:28
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 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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

DOCUMENT
FOLDER

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 Data Requests, Set II, numbered OTS-RE-57-D through OTS-RE-77-D and OTS-RS-37-D through OTS-RS-42-D 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

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

DOCKETED
FEB 14 1996

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


Paul E. Russell

Dated: February 10, 1995
at Allentown, Pennsylvania

February 11, 1995

PP&L

Kenneth B. Kalisz
408 Mentzer Avenue
New Holland PA 17557

RECEIVED
95 FEB 15 AM 10:01
PA. P. U. C.
INFO. CONTROL DIV.

Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Dear PUC:

I object to PP&L 's proposed rate increase for residential customers. An increase of 20% will raise my average winter bill by about \$40.00.

I am already on the Budget Billing Plan and making payments for last year's budget plan difference. A 20% increase will make my monthly winter bill over \$200.00.

PP&L like all businesses of the 90's must find alternative ways to work "leaner" without putting the burden on its customers.
Thank you.

Sincerely,

Kenneth B. Kalisz
Kenneth B. Kalisz

DOCKETED
FEB 16 1995

**DOCUMENT
FOLDER**

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
FEB 14 1995
BUREAU OF CONSUMER SERVICES
DIVISION OF FIELD SERVICES

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

ORIGINAL

FAX: 610/774-6726

February 13, 1995

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

RECEIVED
95 FEB 15 AM 9:40
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 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

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 1, 5, 7 through 12 (PP&L filed an objection to Q.6 on February 9, 1995), 14 through 21, 23 through 36, 38, 40 through 42 and 44 through 48, Set II numbered 1 through 36 and Set III numbered 1 through 30 upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

HAND DELIVERED

Mary C. Kenney, Esquire
Assistant 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
FEB 23 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

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

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


Paul E. Russell

Dated: February 13, 1995
at Allentown, Pennsylvania

ORIGINAL

MORGAN, LEWIS & BOCKIUS

COUNSELORS AT LAW

2000 ONE LOGAN SQUARE

PHILADELPHIA, PENNSYLVANIA 19103-6993

TELEPHONE: (215) 963-5000

FAX: (215) 963-5299

KJR

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NEW YORK

MIAMI

PRINCETON

BRUSSELS

WASHINGTON

LOS ANGELES

HARRISBURG

LONDON

FRANKFURT

TOKYO

ANTHONY C. DECUSATIS

DIAL DIRECT (215) 963-5034

February 15, 1995

VIA FIRST CLASS MAIL

John G. Alford, Secretary
Pennsylvania Public Utility Commission
North Office Building
New Filing Section, Room B-18
Commonwealth and North Streets
Harrisburg, PA 17120

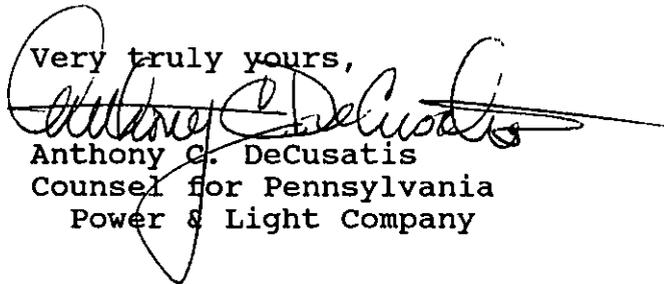
RECEIVED
95 FEB 21 AM 9:16
INFO. CONTROL DIV.

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

Dear Secretary Alford:

Enclosed please find an original and three copies of Pennsylvania Power & Light Company's Objection to Office of Consumer Advocate ("OCA") Interrogatory Set V, No. 48. As evidenced by the attached Certificate of Service, copies of the enclosed Objection have been served on all parties of record and upon the Administrative Law Judge.

Very truly yours,


Anthony C. DeCusatis
Counsel for Pennsylvania
Power & Light Company

ACD:lms
Enclosures

cc: Per Attached Certificate of Service
Hon. Michael Schnierle, Adm. Law Judge

DOCUMENT
FOLDER

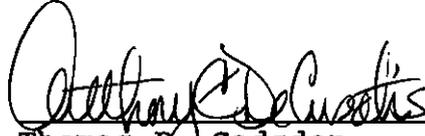
following prohibition on the disclosure of trial preparation material:

The discovery may not include disclosure of the mental impressions of a participant's attorney or his conclusions, opinions, memoranda, notes, summaries, legal research or legal theories.

3. PP&L's witness, Mr. John Sipics, whose testimony is referenced in OCA Interrogatory, Set V, No. 48, has not offered a legal opinion regarding how "excess capacity" is defined or determined under applicable statutory, Commission or Appellate Court precedent. Mr. Sipics is not a lawyer and, to the extent the OCA's interrogatory seeks to elicit a legal opinion from Mr. Sipics, it is improper.

4. To the extent OCA Interrogatory, Set V, No. 48 seeks to elicit the "conclusions, opinions...legal research or legal theories" of PP&L's legal counsel, it is violative of the prohibition imposed by 52 Pa. Code § 5.323, as quoted above.

THEREFORE, for the reasons set forth above, PP&L's objection to OCA Interrogatory Sec V, No. 48 should be sustained and the aforementioned interrogatory stricken.



Thomas F. Gadsden
David B. MacGregor
Anthony C. DeCusatis
Attorneys for Pennsylvania
Power & Light Company

OF COUNSEL:

MORGAN, LEWIS & BOCKIUS
2000 One Logan Square
Philadelphia, PA 19103

DATED: February 15, 1995

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, et al. :
 : DOCKET NOS. R-00943271
v. : R-00943271C001, et seq.
 :
PENNSYLVANIA POWER & LIGHT :
COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this 15th day of February served a true copy of the aforementioned document per the requirements of 52 Pa. Code §§1.54, and in the manner and upon the parties of record listed below:

VIA FAX AND FIRST CLASS MAIL

Tanya J. McCloskey, Esq.
Mary C. Kenney, Esq.
Assistant Consumer Advocates
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

FIRST CLASS MAIL

Hon. Michael C. Schnierle
Administrative Law Judge
Pennsylvania Public Utility Commission
Room G-5, North Office Building
P.O. Box 3265
Harrisburg, PA 17120-3265

Johnnie E. Simms, Esq.
Stephen Gorka, Esq.
Kenneth L. Mickens, Esq.
PA Public Utility Commission
Office of Trial Staff
Pitnick Building - 3rd Floor
901 North 7th Street (Rear)
Harrisburg, PA 17102

James P. Dougherty, Esq.
David M. Kleppinger, Esq.
McNees, Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

PA P.U.C. v. Pennsylvania Power & Light Company
Docket Nos. R-0943271 and R-00943271C001, et seq.
page 2 of 2

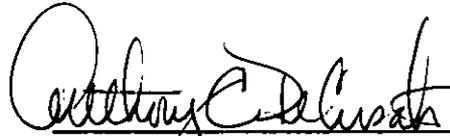
Bernard A. Ryan, Jr., Esq.
Karen Oill Moury, Esq.
Off. of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

D. Jane Drennan, Esq.
1216 16th Street Northwest
Washington, D.C. 20036

Joan O. Brandeis, Esq.
Schnader, Harrison, Segal & Louis
Suite 3600, 1600 Market Street
Philadelphia, PA 19103-4252

David A. McCormick, Esq.
Regulatory Law Office
Office of the Judge Advocate General
Department of the Army
(DAJA-RL 3848)
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

Date: February 15, 1995



Anthony C. DeCusatis
Counsel for Pennsylvania-
American Water Company

ORIGINAL

KJR



1201 Walnut Bottom Road
P.O. Box 1201
Carlisle, Pennsylvania 17013-0905
Telephone (717) 245-6502
Fax (717) 245-6893

Russell R. Gutshall
Staff Manager-Pricing & Tariffs

February 16, 1995

RECEIVED
96 FEB 21 AM 11:25
INFO. CONTROL DIV.
P. U. C.

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

Dear Mr. Alford:

This notice is in compliance with the Commission Order at R-870698, dated July 16, 1987. The United Telephone Company of Pennsylvania has provisions in its current tariff to promote Custom Calling Service features and U-Touch Service by temporary waiver of the Local Monthly Service Rate and/or Service Connection Charges for a period not to exceed ninety (90) days in any twelve (12) month period per exchange.

Due to a change in United's marketing plans, we are requesting to revise the March waiver of the Service Connection Charges to include all of our exchanges. Please disregard the previous letter, dated January 27, 1995, requesting a waiver in certain exchanges. The revised promotional period will begin with our March, 1995 billing.

Sincerely,

Russell R. Gutshall
Staff Manager-Pricing & Tariffs

RRG/mkr

cc: H. K. Dailey
R. L. Reeder
E. E. Varhola

DOCUMENT DOCKETED
FOLDER
MAR 01 1995

2-21
A7

MORGAN, LEWIS & BOCKIUS

ORIGINAL

PHILADELPHIA
NEW YORK
MIAMI
PRINCETON
BRUSSELS

COUNSELORS AT LAW
2000 ONE LOGAN SQUARE
PHILADELPHIA, PENNSYLVANIA 19103-6993
TELEPHONE: (215) 963-5000
FAX: (215) 963-5299

WASHINGTON
LOS ANGELES
HARRISBURG
LONDON
FRANKFURT
TOKYO

KJR

ALAN K. MAESAKA
DIAL DIRECT (215) 963-5236

February 16, 1995

VIA FIRST CLASS MAIL

John G. Alford, Secretary
Pennsylvania Public Utility Commission
North Office Building
New Filing Section, Room B-18
Commonwealth and North Streets
Harrisburg, PA 17120

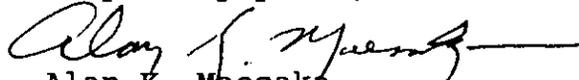
RECEIVED
FEB 21 PM 9:17
INFO. CONTROL DIV.

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

Dear Secretary Alford:

Enclosed please find an original and three copies of Pennsylvania Power & Light Company's Objection to PP&L Industrial Customer Alliance's ("PPLICA") Interrogatory Set II, No. 10.b. As evidenced by the attached Certificate of Service, copies of the enclosed Objection have been served on all parties of record and upon the Administrative Law Judge.

Very truly yours,



Alan K. Maesaka
Counsel for Pennsylvania
Power & Light Company

AKM:lms
Enclosures

cc: Per Attached Certificate of Service
Hon. Michael Schnierle, Adm. Law Judge

DOCUMENT
FOLDER

2.21
48

ORIGINAL

RECEIVED
FEB 21 1995

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S OFFICE
Public Utility Commission

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, et al. :
v. :
PENNSYLVANIA POWER & :
LIGHT COMPANY :

DOCKET NOS. R-00943271
R-00943271C001, et seq.

OBJECTION OF PENNSYLVANIA POWER & LIGHT COMPANY
TO PP&L INDUSTRIAL CUSTOMER ALLIANCE
INTERROGATORY SET II, NO. 10.b.

Pennsylvania Power & Light Company ("PP&L" or the
"Company"), pursuant to 52 Pa. Code § 5.342(c), hereby objects to
PP&L Industrial Customer Alliance ("PPLICA") Interrogatory Set
II, No. 10.b. for the reasons set forth hereafter.

1. On February 6, 1995, PPLICA served upon PP&L its
Interrogatory Set II containing questions numbered 1 through 18.
Question No. 10.b. thereof states as follows:

Please provide all documentation, i.e.,
correspondence, memos, studies, reports, that
address the timing of the filing of this rate
request.

2. The Commission's regulations at 52 Pa. Code §
5.323 limit the scope of permissible discovery by imposing the
following prohibition on the disclosure of trial preparation
material:

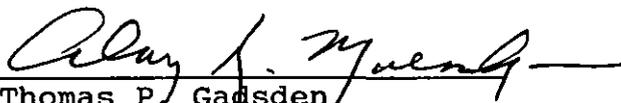
PH03/58973.3

DOCUMENT
FOLDER
DOCKETED
MAR 01 1995

The discovery may not include disclosure of the mental impressions of a participant's attorney or his conclusions, opinions, memoranda, notes, summaries, legal research or legal theories.

3. To the extent PPLICA Interrogatory, Set II, No. 10.b. seeks to elicit disclosure of material comprehended by the prohibition imposed by 52 Pa. Code § 5.323, as quoted above, the question is improper and PP&L objects thereto.

THEREFORE, for the reasons set forth above, PP&L's objection to PPLICA Interrogatory Set II, No. 10.b. should be sustained and the aforementioned interrogatory stricken.


Thomas P. Gadsden
David B. MacGregor
Anthony C. DeCusatis
Alan K. Maesaka
Attorneys for Pennsylvania
Power & Light Company

OF COUNSEL:

MORGAN, LEWIS & BOCKIUS
2000 One Logan Square
Philadelphia, PA 19103

DATED: February 16, 1995

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, et al. :
v. : DOCKET NOS. R-00943271
: R-00943271C001, et seq.
PENNSYLVANIA POWER & LIGHT :
COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of February served a true copy of the aforementioned document per the requirements of 52 Pa. Code §§1.54, and in the manner and upon the parties of record listed below:

VIA FAX AND FIRST CLASS MAIL

James P. Dougherty, Esq.
David M. Kleppinger, Esq.
McNees, Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

FIRST CLASS MAIL

Hon. Michael C. Schnierle
Administrative Law Judge
Pennsylvania Public Utility Commission
Room G-5, North Office Building
P.O. Box 3265
Harrisburg, PA 17120-3265

Johnnie E. Simms, Esq.
Stephen Gorka, Esq.
Kenneth L. Mickens, Esq.
PA Public Utility Commission
Office of Trial Staff
Pitnick Building - 3rd Floor
901 North 7th Street (Rear)
Harrisburg, PA 17102

Tanya J. McCloskey, Esq.
Mary C. Kenney, Esq.
Assistant Consumer Advocates
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

PA P.U.C. v. Pennsylvania Power & Light Company
Docket Nos. R-0943271 and R-00943271C001, et seq.
page 2 of 2

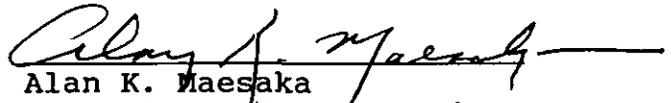
Bernard A. Ryan, Jr., Esq.
Karen Oill Moury, Esq.
Off. of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

D. Jane Drennan, Esq.
1216 16th Street Northwest
Washington, D.C. 20036

Joan O. Brandeis, Esq.
Schnader, Harrison, Segal & Louis
Suite 3600, 1600 Market Street
Philadelphia, PA 19103-4252

David A. McCormick, Esq.
Regulatory Law Office
Office of the Judge Advocate General
Department of the Army
(DAJA-RL 3848)
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

Date: February 16, 1995


Alan K. Maesaka
Counsel for Pennsylvania
Power & Light Company



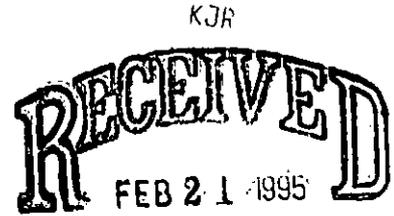
Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

February 16, 1995



SECRETARY'S OFFICE
Public Utility Commission

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 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

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 PP&L Industrial
Customer Alliance's Interrogatories, Set 1 numbered 1 through 33 upon the
active participants listed below, in accordance with the requirements of § 1.54
(relating to service by a participant):

HAND DELIVERED

Mary C. Kenney, Esquire
Assistant 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
FEB 22 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
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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


Paul E. Russell
Paul E. Russell

Dated: February 16, 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

February 16, 1995

**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 Pennsylvania Power & Light Company Industrial Customer Alliance's Interrogatories, Set I numbered 1 through 33 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

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

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

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119 West Coover Street
Mechanicsburg, Pennsylvania 17055

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1130 Loop Drive
Harrisburg, Pennsylvania 17112-2151

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

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Moscow, Pennsylvania 18444

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1817 Green Street
Harrisburg, Pennsylvania 17102

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

Ms. Ethel Richardson
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Lake Ariel, Pennsylvania 18436

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Allentown, Pennsylvania 18103

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Carlisle, Pennsylvania 17013

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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


Paul E. Russell

Dated: February 16, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

KJR

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

FAX: 610/774-6726

February 16, 1995

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

DOCUMENT
FOLDER

RECEIVED
FEB 21 11 14 AM '95
INFO. CONTROL DIV.
PA. P. U. C.

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. Schrierle

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, Set II numbered OTS-RB-33 through OTS-RB-57 upon the
active participants listed below, in accordance with the requirements of § 1.54
(relating to service by a participant):

HAND DELIVERED

Mary C. Kenney, Esquire
Assistant 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
FEB 23 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
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J. Kennedy and Associates, Inc.
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Atlanta, Georgia 30328

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


Paul E. Russell

Dated: February 16, 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

February 16, 1995

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

DOCUMENT
FOLDER

Dear Participant:

Today, Pennsylvania Power & Light Company (PP&L) served answers to the Office of Trial Staff's Interrogatories, Set II numbered OTS-RB-33 through OTS-RB-57 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

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

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
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Mr. Jack A. Baker
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Ms. Elaine Scheidler
1130 Loop Drive
Harrisburg, Pennsylvania 17112-2151

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

DOCKETED
FEB 23 1995

**DOCUMENT
FOLDER**

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

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Allentown, Pennsylvania 18103

Ms. Charlotte Rackley
1817 Green Street
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Mr. & Mrs. Robert Bell
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Mifflintown, Pennsylvania 17059

Ms. Ethel Richardson
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Mifflintown, Pennsylvania 17059

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RD 4, Box 349E
Lake Ariel, Pennsylvania 18436

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Mrs. Harold K. Shields
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Harrisburg, Pennsylvania 17110

Mr. Stephen Smith
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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


Paul E. Russell

Dated: February 16, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

K7

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

FAX: 610/774-6726

**DOCUMENT
FOLDER**

February 17, 1995

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**

RECEIVED
95 FEB 21 PM 11:20
P. U. C. DIV.
INFO. CONTROL

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

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 answers to the Office of Consumer
Advocate's Interrogatories, Set IV numbered 1 through 130 upon the active
participants listed below, in accordance with the requirements of § 1.54
(relating to service by a participant):

HAND DELIVERED

Mary C. Kenney, Esquire
Assistant 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

DOCKETED
FEB 23 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
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Atlanta, Georgia 30328

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


Paul E. Russell

Dated: February 17, 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

DOCUMENT
FOLDER

February 17, 1995

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

RECEIVED
95 FEB 21 AM 11:20
PA. P. U. C.
INFO. CONTROL DIV.

Dear Participant:

Today, Pennsylvania Power & Light Company (PP&L) served answers to the Office of Consumer Advocate's Interrogatories, Set IV numbered 1 through 130 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

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

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

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1130 Loop Drive
Harrisburg, Pennsylvania 17112-2151

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

DOCUMENT
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DOCKETED
FEB 23 1995

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
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Moscow, Pennsylvania 18444

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Allentown, Pennsylvania 18103

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1817 Green Street
Harrisburg, Pennsylvania 17102

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Ms. Ethel Richardson
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Mifflintown, Pennsylvania 17059

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

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

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29 Colonial Road
Allentown, Pennsylvania 18103

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

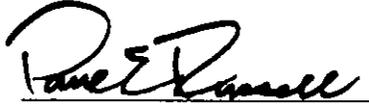
Mrs. Harold K. Sheilds
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Mr. Stephen Smith
734 8th Avenue
Bethlehem, Pennsylvania 18018

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

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


Paul E. Russell

Dated: February 17, 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

February 21, 1995

KJR

RECEIVED

95 FEB 23 AM 9: 58

P.A. 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 1 through 36 and 38 through 47 and 49 through 64 (PP&L filed an objection to Question 48 on February 15, 1995) 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
Paul E. Russell
MAR 02 1995
DOCKETED

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):

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Mr. Gary Bootay
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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



Paul E. Russell

Dated: February 21, 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

February 21, 1995

Mary C. Kenney, Esquire
Assistant Consumer Advocate
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

RECEIVED
95 FEB 23 AM 9:58
F.A.C. U.C. DIV.
INFO. CONTROL DIV.

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

Dear Ms. Kenney:

Enclosed are Pennsylvania Power & Light Company's (PP&L) answers to the Office of Consumer Advocate's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PP&L's answers have been served on all active participants in this proceeding.

If you have any questions regarding these answers, please call.

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

DOCUMENT
FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

RECEIVED

FEB 23 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

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 V numbered 1 through 36 and 38 through 47 and 49 through 64 (PP&L filed an objection to Question 48 on February 15, 1995) upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

HAND DELIVERED

Mary C. Kenney, Esquire
Assistant 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 02 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
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Washington, DC 20036

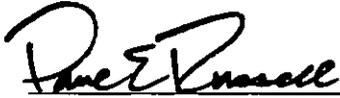
David A. McCormick, Esquire
Department of the Army
Office of the Judge Advocate General
901 North Stuart Street
Arlington, Virginia 22203-1837

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
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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


Paul E. Russell

Dated: February 21, 1995
at Allentown, Pennsylvania

ORIGINAL



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

February 21, 1995

RECEIVED
95 FEB 23 AM 9:58
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

DOCUMENT
FOLDER



Pennsylvania Power & Light Company

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

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

KJR

FAX: 610/774-6726

February 21, 1995

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F.A. C. DIV.
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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 PP&L Industrial Customer Alliance's Interrogatories, Set II numbered 1 through 10(a) and 11 through 18 (PP&L filed an objection to Question 10(b) on February 16, 1995) upon the active participants in this proceeding.

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Very truly yours,

Paul E. Russell

DOCKETED
MAR 02 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
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Ms. Elaine Scheidler
1130 Loop Drive
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Mr. Harold C. Landes
2680 Old Bethlehem Pike
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Ms. Laura N. Hager
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1106 West Livingston Street
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1817 Green Street
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P. O. Box 5834
Harrisburg, Pennsylvania 17110

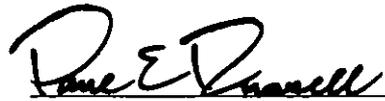
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1250 W. Jubilee Street
Emmaus, Pennsylvania 18049

Gerhard and Melanie Wendt
9124 Joyce Lane
Hummelstown, Pennsylvania 17036


Paul E. Russell
Paul E. Russell

Dated: February 21, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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Paul E. Russell
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610/774-4254

FAX: 610/774-6726

February 21, 1995

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

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

Dear Mr. Kleppinger:

Enclosed are Pennsylvania Power & Light Company's (PP&L) answers to the PP&L Industrial Customer Alliance's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PP&L's answers have been served on all active participants in this proceeding.

If you have any questions regarding these answers, please call.

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

DOCUMENT
FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

CERTIFICATE OF SERVICE

RECEIVED

FEB 23 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

I hereby certify that I have this day served a true copy of Pennsylvania Power & Light Company's answers to the PP&L Industrial Customer Alliance's Interrogatories, Set II numbered 1 through 10(a) and 11 through 18 (PP&L filed an objection to Question 10(b) on February 16, 1995) upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

HAND DELIVERED

Mary C. Kenney, Esquire
Assistant 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

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MAR 02 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
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Sarah E. Tomalty, Esquire
Drennan & Associates
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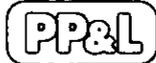
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Atlanta, Georgia 30328

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Schnader, Harrison, Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, Pennsylvania 19103-4252


Paul E. Russell

Dated: February 21, 1995
at Allentown, Pennsylvania

ORIGINAL



Pennsylvania Power & Light Company

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

FAX: 610/774-6726

February 21, 1995

RECEIVED
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INFORMATION 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

DOCUMENT
FOLDER

cc: The Honorable Michael C. Schnierle

MID-ATLANTIC ENERGY PROJECT

*A Project of the Pace University School of Law
Center for Environmental Legal Studies*

Widener Energy Law Clinic

February 22, 1995

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

v: 610.774.4254
f: 610.774.6726

RE: PP&L's current rate case, Docket No. R00943271 (filed 12/94)
Notice of participation and request for copies

Dear Counsel:

I represent Sierra Club, a complainant and petitioner to intervene in this docket. This is a formal request for copies of all documents which you have exchanged, or will exchange, in this case, including

- ◆ pleadings, motions, correspondence and other filed papers,
- ◆ a copy of your evidentiary filing,
- ◆ discovery materials, including interrogatories, document requests, requests for admission, and responses to such documents.

We would appreciate your providing both the hard copy and a diskette copy (or copy on a public BBS) of each document. (The Company has very kindly provided us with a copy of its filing. We would appreciate an additional copy to use for transmittal to our consultants.)

For the purposes of tracking discovery, we ask each party to tell us if there is a numbering system that you follow for responses that varies from the numbers on the requests you receive. If so, and if it involves your marking up discovery letters I would appreciate being copied with each markup so that my secretary can set up files in advance. I am aware of six OCA discovery letters, with the letters numbered Roman I-VI, and each letter's questions

Sender's Address:

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Pace University School of Law
78 North Broadway, White Plains, NY 101
914/422-4227 • 914/422-4180 FAX

Pennsylvania Office
Widener Energy Law Clinic
3700 Vartan Way
Harrisburg, Pennsylvania 17110-9450
717/541-1967 • 717/541-1970 FAX

New Jersey Office
626 From Road
Paramus, New Jersey 07652
201/342-9404

All Parties on Service List
Addresses per service list

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MAR 10 1995

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FEB 27 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

**DOCUMENT
FOLDER**

renumbered in Arabic numerals. I have not seen OTS' requests yet, although I understand that the Company may have provided some responses to OTS already.

Further, for secretarial relief purposes, we ask each party if it would make things easier if we provided copies of our filings (or just some of them) to you (a) on disk or (b) on the NARUC BBS. I have found that such exchanges relieve paralegals and secretaries of parties of some typing chores.

Very truly yours,

/s

Alan J. Barak
Attorney for Sierra Club

\\ppl1\copies2.ltr

SERVICE LIST

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PA Public Utility Commission
Room G-23, North Office Building
Harrisburg, PA 17120

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PA Public Utility Commission
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Kenneth L. Mickens, Esq.
PA Public Utility Comm.
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County Inc.
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Laura N. Haser
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Lancaster, PA 17603

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Main Capitol, House Box 202020
Harrisburg, PA 17120-2020

Wallace R. & Doris M. Fenner
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Whitehall, PA 18052-6920

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Hon. Joseph M. Uliana
Senate of Pennsylvania
Senate Post Office
Main Capitol
Harrisburg, PA 17120

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Office of the Judge Advocate General
Dept. of the Army
901 North Stuart Street - Room 713
Arlington, VA 22203-1837

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Mifflintown, PA 17059

Ethel Richardson
RD 3, Box 1383
Mifflintown, PA 17059

Hon. Sheila Miller
House of Representatives
Main Capitol
Harrisburg, PA 17120

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Industrial Economics Incorporated
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Associate General Counsel
Pennsylvania Power & Light Co.
Two North Ninth Street
Allentown, PA 18101-1179

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

Tanya J. McCloskey, Esq.
Mary C. Kenney, Esq.
Assistant Consumer Advocates
Office of the Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

APPLNLISTSSERVICE.LST



Pennsylvania Power & Light Company

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

COPY

FAX: 610/774-6726

February 23, 1995

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

RECEIVED
95 FEB 27 AM 10: 51
PA. P. U. C.
INFO. CONTROL DIV.

Dear Participant:

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Very truly yours,

Paul E. Russell

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

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Quakertown, Pennsylvania 18951

DOCKETED
MAR 07 1995

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

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P.O. Box 57
Breinigsville, Pennsylvania 18031

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

Mr. Paul Gatto
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Dickson City, Pennsylvania 18519

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Ms. Geraldine L. Miller
7028 Sell Road
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Allentown, Pennsylvania 18104

Mr. Kermit L. Link
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P. O. Box 408
Halifax, Pennsylvania 17032

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323 Market Street
P.O. Box 373
Auburn, Pennsylvania 17922-0373

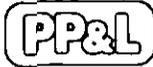
Agnes & Harry Baumer
7 South Water Street, Apt. B
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190 Hill Road
Danville, Pennsylvania 17821


Paul E. Russell

Dated: February 23, 1995
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Pennsylvania Power & Light Company

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KJR

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February 23, 1995

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Harrisburg, Pennsylvania 17105-3265

RECEIVED
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Very truly yours,

Paul E. Russell

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Re: Docket No. R-00943271

FEB 27 1995

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SECRETARY BUREAU

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Pennsylvania Public Utility Commission
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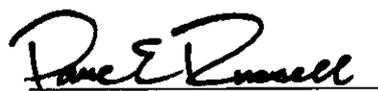
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MCNEES, WALLACE & NURICK

ATTORNEYS AT LAW

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JOHN S. OYLER
TIMOTHY J. PFISTER
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ROBERT D. STETS
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STEVEN J. WEINGARTEN
NEAL S. WEST
NORMAN I. WHITE
LAWRENCE R. WIEDER
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JONATHAN C. BERRY
BRETT D. DAVIS
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JAMES P. DOUGHERTY
KATHLEEN A. DUNST
ROBERT J. GODUTO

95 FEB 23 1995
REC'D
P.A.P.U.C. DIV.
SCOTT A. GOULD
P. NICHOLAS GUARNESCHELLI
ROBERT G. HAAS
BRIAN F. JACKSON
DONALD B. KAUFMAN
MICHAEL R. KELLEY
PETER F. KRITZ
JAMES W. KUTZ
CAMILLE C. MARION
PATRICK J. MURPHY
SHARON R. PAXTON
CHUONG H. PHAM
JONATHAN H. RUDD
BRUCE R. SPICER
CAROL A. STEINOUR
CATHERINE E. WALTERS
DERRICK P. WILLIAMSON

February 24, 1995

Paul E. Russell, Esquire
Associate General Counsel
Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, PA 18101-1179

VIA FACSIMILE
FOLLOW-UP U.S. MAIL

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

Dear Mr. Russell:

Enclosed are two copies of the Third Set of Interrogatories of the PP&L Industrial Customer Alliance to Pennsylvania Power & Light Company in the above-captioned proceeding.

Please send a copy of the responses along with all attachments to me and to our consultant:

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

Thank you for your attention to this matter.

Very truly yours,

MCNEES, WALLACE & NURICK

By *David M. Kleppinger*

David M. Kleppinger

DMK/gm
Enclosures

c: ✓ John G. Alford, Secretary (w/o enc.)
Hon. Michael C. Schnierle (w/o enc.)
Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing PPLICA Interrogatories on all known parties of record to this proceeding, by First Class Mail, addressed as follows:

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Kenneth L. Mickens, Esq.
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Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

David M. Kleppinger / gm
David M. Kleppinger

Dated this 24th day of February, 1995, in Harrisburg, Pa.