



Pennsylvania Power & Light Company

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

ORIGINAL

KJR

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

FAX: 610/774-6726

March 8, 1995

RECEIVED
95 MAR 10 AM 9:08
PA. P. U. C. DIV.
INFO. CONTROL

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

**DOCUMENT
FOLDER**

Attachment

cc: The Honorable Michael C. Schnierle

3/10
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

CERTIFICATE OF SERVICE

RECEIVED
MAR 10 1995

SECRETARY'S OFFICE
Public Utility Commission

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 and
Set V numbered 37 upon the individual listed below, in accordance with the
requirements of § 1.54 (relating to service by a participant):

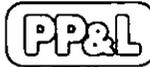
Mr. Charles Esterbrook
45 Park Street
Akron, Pennsylvania 17501

DOCKETED
MAR 22 1995


Paul E. Russell

Dated: March 8, 1995
at Allentown, Pennsylvania

**DOCUMENT
FOLDER**



Pennsylvania Power & Light Company

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

KJR

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

FAX: 610/774-6726

March 9, 1995

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

RECEIVED
95 MAR 13 AM 9:48
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 individuals 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

3-13
4

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

DOCKETED
MAR 22 1995

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-RR-6 through OTS-RR-18 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

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

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P.O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596


Paul E. Russell

Dated: March 9, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

KJR

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

JR

FAX: 610/774-6726

March 9, 1995

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

RECEIVED
MAR 13 1995

SECRETARY'S OFFICE
Public Utility Commission

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

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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

DOCKETED
MAR 22 1995

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 VII numbered 1 through 8 and Set VIII numbered 1 through 16 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**

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
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Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P.O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
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James Melia, Esquire
Kirpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596


Paul E. Russell

Dated: March 9, 1995
at Allentown, Pennsylvania



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

March 9, 1995

In Re: **R-00943271,**
R-00943271C0001-C0128

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 MAR 13 AM 7:38
 PA. P. U. C. DIV.
 INFO. CONTROL DIV.

KJR

(See attached list)

Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company

DOCKETED
 MAR 14 1995

Investigation into a proposed \$261,000,000 annual rate increase.

NOTICE

This is to inform you that an Initial Hearing on the above-captioned case will be held Tuesday, March 21, 1995 at 10:00 a.m. in an available hearing room, Ground Floor, North Office Building, North Street and Commonwealth Avenue, Harrisburg, Pennsylvania.

Additionally, a further hearing schedule has been set as follows:

Thursday, March 23, 1995	at	10:00 a.m.
Friday, March 24, 1995	at	10:00 a.m.
Monday, March 27, 1995	at	10:00 a.m.
Tuesday, March 28, 1995	at	10:00 a.m.
Wednesday, March 29, 1995	at	10:00 a.m.
Tuesday, April 25, 1995	at	10:00 a.m.
Wednesday, April 26, 1995	at	10:00 a.m.
Thursday, April 27, 1995	at	10:00 a.m.
Friday, April 28, 1995	at	10:00 a.m.
Tuesday, May 2, 1995	at	10:00 a.m.
Wednesday, May 3, 1995	at	10:00 a.m.
Monday, May 22, 1995	at	10:00 a.m.
Tuesday, May 23, 1995	at	10:00 a.m.
Wednesday, May 24, 1995	at	10:00 a.m.
Thursday, May 25, 1995	at	10:00 a.m.
Friday, May 26, 1995	at	10:00 a.m.

**DOCUMENT
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All of the above-scheduled hearings will also be held in an available hearing room, Ground Floor, North Office Building, North Street and Commonwealth Avenue, Harrisburg, Pennsylvania.

A schedule of public input hearings will be provided by additional letter.

The presiding officer in this proceeding is Administrative Law Judge Michael C. Schnierle. Judge Schnierle can be contacted at PO Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 783-5452.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: (717) 787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5984

cc: Judge Schnierle
Kevin Cadden - Rm. 111
John Frazier - BPL
Office of Trial Staff (4)
Law Bureau - Rm. G28
Consumer Advocate (2)
Small Business Advocate
Gail Miller - Rm. 118
Bill Barrett
Norma Lewis
Judy Weaver, Scheduling Officer
Calendar File
Beth Plantz
Docket Section

Certified Mail
Receipt Requested &
Reg. Mail to Complainant

MID-ATLANTIC ENERGY PROJECT

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

ORIGINAL
Sender's Address:
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Pace University School of Law
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914/422-4227 • 914/422-4180 FAX

■ Pennsylvania Office
Widener Energy Law Clinic
3700 Vertan 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

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MAR 13 1995
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KJR

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MAR 13 1995

SECRETARY'S OFFICE
Public Utility Commission

March 10, 1995

John J. Alford, Secretary
PA Public Utility Commission
Room G-23, North Office Building
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light Co.,
Docket No. R-00943271
Sierra Club's Prehearing Memorandum

Dear Secretary Alford:

Enclosed please find for filing an original of the Sierra Club's Prehearing Memorandum, as well as our Certificate of Service per the attached Service List.

We also enclose a copy for our files which we request be time-stamped and returned in the envelope provided.

Very truly yours,

Alan J. Barak
Mid-Atlantic Energy Project

Attorney for Sierra Club

cc: ALJ Schnierle (2 copies); Service List (1 copy)

AJB/mlm
Enclosures

DOCUMENT
FOLDER

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ORIGINAL

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility)
Commission)
)
v.)
)
Pennsylvania Power & Light Co.)
(General rate increase request))

Docket No. R-000943271

RECEIVED
MAR 13 1995

SIERRA CLUB'S PREHEARING MEMORANDUM

SECRETARY'S OFFICE
Public Utility Commission

This Memorandum addresses the following matters: background of the case, including a summary of the rate filing, the OCA's Complaint, the parties' complaints, Sierra Club and its interests, and the history of the case; Sierra Club's positions on cost of service issues and rate design; the status of Sierra Club's discovery; and the relief Sierra Club has requested.

BACKGROUND

The rate filing

1. On December 30, 1994, Pennsylvania Power & Light Company ("PP&L" or "the Company") filed Tariff Supplement No. 50 to Tariff Electric - Pa. P.U.C. No. 200, setting forth proposed changes and increases in base rates ("PP&L Rate Filing") of \$261 million, or about 11.7%.¹ The Commission assigned the matter Docket No. R-00943271.

The OCA Complaint

2. On January 23, 1995, the Office of Consumer Advocate ("OCA"), Irwin A. Popowsky, Consumer Advocate, filed a Formal Complaint ("OCA Complaint") and Public Statement in the proceeding. The OCA alleged that a 500-kwh-per-month customer's bill would increase by \$9.30 per month -- from about \$44.82 to \$54.12, with the annual bill increasing from \$537.84 to \$649.44.²

¹ PP&L Rate Filing, Statement of Reasons at

² OCA Complaint at 2 ¶ 3.C.

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3. The OCA alleges that a preliminary examination of the Company's filing indicates that the proposed charges, proposed increases and changes in rates, proposed rate schedule modifications and transfers, and proposed changes in rate policy, rules and regulations contained in the proposed Tariff are or may be unjust, unreasonable, in violation of law and will or may produce an excessive return on investment in violation of the Public Utility Code, 66 Pa. C.S.A. § 1301 *et seq.*³

4. The OCA Complaint further alleges that:

a. the Company proposes a \$2.40 increase in the monthly residential customer charge, from \$4.80 to \$7.20 per month.⁴

b. the Company's claim for a return on common equity associated with Susquehanna Nuclear Steam Electric Station Unit 2 involves a claim for physical or economic excess capacity, disallowable under 66 Pa. C.S.A. § 1301, 1315, 1323⁵, insofar as the Commission has already found the facility to represent excess capacity⁶;

c. unjust, unreasonable rates may result from granting claims related to nuclear and fossil fuel decommissioning costs (of more than \$40 million per year)⁷, costs associated with social program expenditures and costs associated with environmental remediation;⁸

d. PP&L's present rates may be excessive, unjust, unreasonable and unduly discriminatory;⁹

The parties' complaints

5. On information and belief over 300 individuals, businesses and organizations have filed complaints against the PP&L proposed action.

³ OCA Complaint at 2 ¶ 3.F.

⁴ OCA Complaint at 2 ¶ C.

⁵ OCA Complaint at 2 ¶ 3.G.

⁶ OCA Complaint, Press Release at 2.

⁷ OCA Complaint, Press Release at 2.

⁸ OCA Complaint at 2 ¶ 3.H.

⁹ OCA Complaint at 2 ¶ 3.K.

6. The Commission has docketed complaints against the PP&L filing as R-00943271C0001, *et seq.*
7. The following parties have intervened or complained and have been granted active status in the case:
 - a. Government bodies: OCA; OSBA; OTS; USDOD and Federal Executive Agencies;
 - b. Businesses and business organizations: Bethlehem Steel; Central Eastern Pennsylvania Fuel Oil Dealers; PP&L Industrial Customer Alliance;
 - c. Nonprofits and other organizations: Commission on Economic Opportunity; University/College Coalition; Sierra Club.
8. Other parties may have requested active status but did not appear at the prehearing conference of March 7, 1995.

Sierra Club and its interests

9. Sierra Club is a century-old broad-based citizens' environmental organization with active members throughout the Commonwealth. It has devoted significant resources to advocating cost-effective, environmentally benign alternatives to existing supply side utility resources.
10. Sierra Club is based in San Francisco, California and maintains a Pennsylvania Chapter with executive offices in Harrisburg, Pennsylvania. The organization's membership is located throughout the Commonwealth, and a state executive committee is broadly representative of the interests of the state's regions. Sierra Club members take service from virtually all of the state's energy utilities.
11. Sierra Club has, since its founding in 1892, been concerned with the exploration, enjoyment, and protection of wild and scenic places of the Earth. Today's agenda includes protection of the national and global environment against threats of acid rain, water and air pollution, hazardous wastes, ozone depletion and global warming. The Sierra Club works to promote the utilization of renewable resources and technologies in order to preserve non-renewable natural resources for usages for which alternatives have not been identified.
12. Sierra Club will be directly affected by the Commission's orders in this matter, and, in particular, the rate and service changes which PP&L proposes through its filing.

PP&L Base Rate Case, Docket No. R-000943271

Sierra Club Prehearing Memorandum

a. Over 1,600 of Sierra Club's members are customers of PP&L and pay PP&L's rates. The Sierra Club Pennsylvania Chapter is organized into "groups" on a geographical basis. The following Groups are located in PP&L's service territory: Berks; Bucks; Governor Pinchot; Lancaster; Lehigh Valley; Moshannon; Northeast Pennsylvania; Otzinachson; Southeast Pennsylvania.

b. Sierra Club pays rent to a commercial customer of PP&L, which rent includes utilities. Sierra Club's offices are located at 600 N. Second St. Suite 409, Harrisburg PA 17108.

c. Sierra Club's pecuniary interests will be immediately and directly affected by the rate changes which PP&L's filing proposes since PP&L seeks to increase and redesign the rates which Sierra Club and its members pay.

d. Sierra Club's interests will be immediately and directly affected by the changes which PP&L's filing proposes in rate design, the treatment of generation and T&D plant accounting and the purchase of energy and fuel in that such changes, if allowed, will be harmful to the physical environment, health and safety.

13. The interests which the PP&L filing proposes to affect are substantial. If granted, PP&L's rate increase request would, on information and belief, increase residential customers' bills unjustly and unreasonably.

14. Sierra Club seeks PP&L rates, and rate policies which are just, reasonable, and not unduly discriminatory or otherwise unlawful.

History of the case

15. Pursuant to notice, the Administrative Law Judge Michael C. Schnierle presided over a Prehearing Conference on March 7, 1995. He admitted certain intervenors and complainants to the case as parties. He adopted the following schedule:

a. Cross of Company Witnesses: Mar 21 at 10:00 a.m., 23 and 24; Mar 27-29. All hearings are to begin at 10:00 a.m. in the Commission's North Office Building, Harrisburg PA.

b. Public input sessions:

Mar 30 Hburg; Mar 31 Lancaster; Williamsport Apr 3 eve; Wilkes Barre - Scranton Apr 4; Hazelton - Pottstown Apr 5; Bethlehem - Allentown Apr 6.

PP&L Base Rate Case, Docket No. R-000943271
Sierra Club Prehearing Memorandum

- c. Filing of intervenor testimony:
 - i. Apr 07: ROR and Generating Capacity
 - ii. Apr 12: Cost of Service, Rate Struct and Rate Design
 - iii. Apr 14: OTS files all its testimony
 - iv. Apr 18: General Accounting and All other issues

- d. Cross of Opposing party witnesses
 - i. Apr 25-28: Rate of return and generating capacity; Cost of Service, Rate Structure and Rate Design
 - ii. May 2-3: General Accounting

- e. Receive Rebuttal:
 - i. May 5: ROR and Generating Capacity
 - ii. May 9: Rate Structure, Cost of Service and Rate Design
 - iii. May 12: General Accounting and all other issues
 - iv. May 12: Co files rebuttal to OTS; OTS files rebuttal to all others

- f. Receipt of Surrebuttal testimony/outlines:
 - i. May 17 (ROR)
 - ii. May 19 (all other issues)

- g. Cross Rebuttal and Surrebuttal witnesses, Rejoinder Testimony and Close of Record
 - i. May 22-26

- h. Initial Briefs Due
 - i. June 15

- i. Reply Briefs Due
 - i. June 26

16. The ALJ also provided that service dates are to be "in hand" service dates, by modem, fax or fed ex, or any other method to accomplish in-hand service. He provided for an active party and an inactive party service list, observing that Commission resources would be better

utilized if the inactive parties had simply sent a letter, rather than submitting formal complaints.

SIERRA CLUB'S POSITIONS

17. Sierra Club intends to offer expert witnesses in the instant case. Upon a thorough review of discovery and other materials relating the following issues Sierra Club will finalize its plans for submission of testimony.

Cost of service issues

18. With respect to the proposed authorized rate of return ("ROR") on common equity, the Company's proposal overstates the ROR by undervaluing the market benefits, including reduced risk, of DSM and renewables investments, and of reliance on more environmentally benign sources of power.

19. With respect to revenues, the Commission should insure that the customers receive the benefits of emissions trading¹⁰, and that such benefits are spread to the customer classes (a) through programs that tie customer behavior to the utility's ability to market credits and (b) according to each class' contribution to the utility's ability to market such credits.

20. The Company's "fundamental restructuring"¹¹ and related transfers of tangible and intangible property may produce unnecessarily high rates because the transfers may be accomplished at less than full value. This may understate revenues and overstate expenses.

21. With respect to depreciation and decommissioning:

- a. the Company's proposed reevaluation of depreciation and decommissioning rates, while tending to increase costs associated with the production of fossil and nuclear power, may still understate the annual costs associated with such production, by, *inter alia*:

¹⁰ PP&L Rate Filing, Statement of Reasons at Book Statement B-2 acct. line item 411.8, "Gains from disposition of emission allowances \$(486,000)" [expense account item].

¹¹ PP&L Rate Filing, Statement of Reasons at 2.

PP&L Base Rate Case, Docket No. R-000943271
Sierra Club Prehearing Memorandum

- i. understating the Susquehanna decommissioning cost and rate¹²;
 - ii. understating the Susquehanna costs of waste storage and disposal¹³;
 - iii. overstating the useful lives of fossil and nuclear plants, producing a lower than reasonable depreciation rate¹⁴;
 - b. the Company's proposed revisions for transmission and distribution ("T&D") rates¹⁵, while lengthening service lives and cutting annual rates, may understate the value of the T&D systems to the customers, and thereby promote the economically inefficient upgrade of T&D resources in light of on-site energy efficiency and renewables measures.
22. With respect to the ECR:
- a. the Company's ECR should terminate in order to foster the most economically efficient purchases of energy resources;
 - b. Alternatively, ECR treatment of power purchases and fuel expenses should be denied unless the Company can demonstrate that it has maximized the benefits of wholesale market purchasing for its customers, and, in particular, that its purchases are the product of least cost competitive bidding or its substantial equivalent conducted at arms' length from intra-Company sources and affiliates and extra-Company sources;
 - c. the proposed treatment of the JCP&L contract termination through the ECR should be denied until and unless the Commission finds that the Company has complied with new competitive bidding regulations in dedicating the capacity and energy for its customers.
23. With respect to demand side management ("DSM") expenditures and expenditure levels the Commission should:
- a. allow direct cost recovery for reasonable and prudent programs;

¹² See PP&L Rate Filing, Statement of Reasons at 10. See, e.g., PP&L Rate Filing, Statement of Reasons at Book Statement B-4, Statement of Operation and Maintenance Expenses, line 518, Nuclear fuel consumed -- leased \$58,073,000; Decontamination and decommissioning fund assessment \$2,889,000.

¹³ See, e.g., PP&L Rate Filing, Statement of Reasons at Book Statement B-4, p. 1 of 6, Statement of Operation and Maintenance Expenses, acct line 518, Spent fuel disposal \$13,248,000; p. 2 of 6, acct lines 528-32, Total Maintenance, nuclear \$60,198,000.

¹⁴ See PP&L Rate Filing, Statement of Reasons at 10.

¹⁵ See PP&L Rate Filing, Statement of Reasons at 13.

- b. allow incentives for reasonable administration of prudent programs, calculated according to the spread embedded in the pricing of PP&L's off-system sales;
- c. allow the recovery of lost revenues associated with the DSM programs, according to just and reasonable measures;
- d. require the implementation of programs to secure all cost-effective DSM, as measured by the TRC test;
- e. require the Company to use all cost-effective DSM means to reduce uncollectible accounts expenses¹⁶.

Rate design

24. With respect to rate design¹⁷ the Commission should:
- a. deny ratemaking recovery for all rate design and marketing programs that would serve to promote the consumption of electricity, including those for "expanded electric use" by high load factor customers¹⁸ and those waiving demand charges¹⁹;
 - b. provide equivalent benefits to members of other classes for the Company's proposed benefits to industrial customers for increased load factors, as with credits and discounts for residential and commercial measures taken to cut peak usage;
 - c. require as a precondition to eligibility for any promotional or discount rate, including "economic development rates", that a business customer be initially and periodically certified through an approved independent auditor that it has undertaken to cost-effectively maximize the energy efficiency of its operations, as measured for the period that the rate is expected to be in effect for it, OR that it has in place an approved plan for such cost-effective measures;

¹⁶ See, e.g., PP&L Rate Filing, Statement of Reasons at Book Statement B-4, p. 5 of 6, Statement of Operation and Maintenance Expenses, acct line 904, Customer Accounts Expenses, Uncollectible accounts \$16,932,000.

¹⁷ See PP&L Rate Filing, Statement of Reasons at 7-8.

¹⁸ PP&L Rate Filing, Statement of Reasons at 14.

¹⁹ PP&L Rate Filing, Statement of Reasons at 14-15.

- d. require the Company's rate design to fully reflect each class' contribution to the need for investment in baseload facilities, including the contribution of high load factor customers to the need for construction and operation of expensive nuclear plants and environmental control facilities²⁰ at large coal-fired plants;
- e. deny the proposed reduction of credits for demonstrably interruptible load²¹, and establish a penalty for the Company's failure to reasonably and prudently utilize contracted service interruptions as a resource when system conditions warrant interruptions.

25. The Commission should require the Company to enhance the choices available to its customers by providing and marketing green pricing tariffs that will permit customers of each of the classes to subscribe to a tariff calculated to support the net costs of the Company's purchasing or otherwise providing energy services from environmentally benign sources, exclusive of customer premises equipment or measures.

26. The Commission should require the Company to enhance the choices available to its customers by providing and marketing to ALL classes of customers discounted tariffs, predicated upon the appropriate certification that the customer has engaged, or is engaged actively, in comprehensive DSM activities and investments to cost-effectively minimize the consumption of electricity, including the customer's contribution to class coincident peaks.

27. Sierra Club reserves the right to identify and raise other issues relating to PP&L's rates, services and charges as the facts become more fully apparent as this case proceeds through the discovery and evidentiary phases.

STATUS OF DISCOVERY

28. Sierra Club has, on March 9, 1995, sent to PP&L its first two sets of data requests, primarily seeking copies of documents that may be in the Company's possession or control. Sierra Club has also sought from the Company a copy of the responses to the other parties' data requests.

²⁰ See PP&L Rate Filing, Statement of Reasons at 8.

²¹ PP&L Rate Filing, Statement of Reasons at 14.

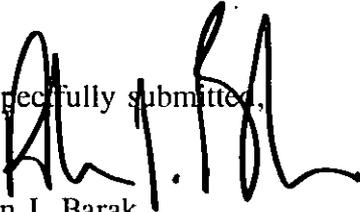
RELIEF REQUESTED

29. Sierra Club has requested, as relief, that the Commission:
- a. Receive for filing and docket this Formal Complaint and Intervention;
 - b. Consolidate this Formal Complaint and Intervention with all Applications, Complaints, Protests and Interventions filed with respect to proposed Supplement No. 50, including the above-captioned matters;
 - c. Order that Sierra Club be a party to such proceedings, that it be placed on the service list, and that each party to the proceeding provide it with all papers filed therein;
 - d. Suspend and investigate the operation of proposed Supplement No. 50, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S.A. § 1308(d);
 - e. Hold full evidentiary contested case hearings examining the reasonableness of PP&L's current rates and its proposed increases in rates, including any and all proposed modifications to rates and rate policy;
 - f. After providing the public with adequate notice, and AFTER THE COMPLETION OF THE FORMAL PARTIES' EVIDENTIARY HEARINGS herein, so that the issues before the public may be properly developed and focused, hold public input hearings throughout PP&L's service territory in order to provide its customers with an opportunity to be heard on the record, and make the testimony and exhibits received therein a part of the record;
 - g. Deny any increase or change in PP&L's rates that is unjust, unreasonable, unduly discriminatory or inconsistent with the Public Utility Code, sound ratemaking principles, and public policy;
 - h. Determine the justness and reasonableness of Respondent's current and proposed rates;
 - i. Grant the relief requested in this Formal Complaint and Intervention;
 - j. Grant all other relief to which Sierra Club is entitled; and

PP&L Base Rate Case, Docket No. R-000943271
Sierra Club Prehearing Memorandum

- k. Grant such other relief which the Commission may deem to be necessary and proper.

Respectfully submitted,



Alan J. Barak,
Attorney for Sierra Club

Alan J. Barak (Sup. Ct. No. 67886)

Mid-Atlantic Energy Project
Widener University Energy Law Clinic
3700 Vartan Way
Harrisburg PA 17110

717/541-1967 voice
717/541-1970 fax

Daniel W. Rosenblum, Director, Of Counsel²²

Dated: March 10, 1995

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²² Member Illinois and New York bars.

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility)
Commission)
)
) Docket No. R-000943271
)
)
v.)
)
Pennsylvania Power & Light Co.)
(General rate increase request))

SIERRA CLUB'S PREHEARING MEMORANDUM

CERTIFICATE OF SERVICE

Alan J. Barak,
Attorney for Sierra Club

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717/541-1967 (voice)
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Dated: March 10, 1995

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility)
Commission)
)
v.)
)
Pennsylvania Power & Light Co.)
(General rate increase request))

Docket No. R-000943271

CERTIFICATE OF SERVICE

I hereby certify that I have this, the 10th day of March, 1995, served a true copy of the foregoing document: Sierra Club's Prehearing Memorandum, upon the following parties of record to this proceeding by First Class Mail, addressed as follows:

John J. Alford, Secretary
PA Public Utility Commission
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Harrisburg, PA 17120

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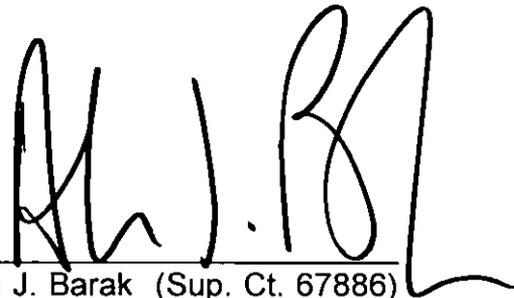
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MID-ATLANTIC ENERGY PROJECT

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

Sender's Address: KJR

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201/792-6911 ■ 201/792-9531 FAX

March 10, 1995

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

RE: Pa PUC v. PP&L Co, Docket No. R-000943271 (Base rate case)
Sierra Club Data Request Set 1 (Q's 1 - 62)
Sierra Club Data Request Set 2 (Q's 1 - 35)

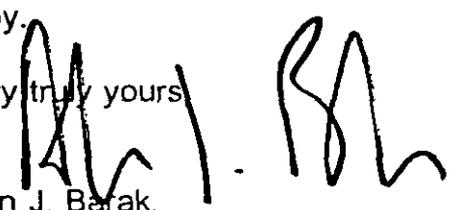
Dear Mr. Russell:

Enclosed are two copies of Set 1 and Set 2 of the Sierra Club's Data Requests to Pennsylvania Power & Light Company in the above-captioned proceeding. We are faxing them to you on the date of this letter, with hard copy placed in the same date's mail. In order to minimize retyping, we have also placed an email copy of them on the NARUC BBS, ERMIS, in the PA_MON forum (forums\energy\next page\pa_mon) in WP 5.1 format.

We would appreciate it if you would communicate any objections you may have as soon as possible. Also, please forward answers as you complete them, rather than batching them for a full set's response. As the General Instructions request, please send a second copy of the responses to our consultants, in care of my office.

By this hard copy letter we are serving each of the active parties to the case with one copy.

Very truly yours,


Alan J. Barak,
Attorney for Sierra Club

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FOLDER

lppi1discdisc01.it

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P.A.P.U.C.
REG. CONTROL DIV.

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COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility)
Commission)
)
v.) Docket No. R-000943271
)
Pennsylvania Power & Light Co.)
(General rate increase request))

SIERRA CLUB'S DATA REQUESTS
TO PP&L: SET 1 (Q's 1 - 62)

Dated: March 10, 1995

Subjects: Standard Data: Reports; Corporate planning case and model run; T&D audits; Affiliated transactions; Affiliated transactions; Billing inserts; Revenues/Forecast/Rate design: Rate levels, customer profile; Standard Data: System Planning; System planning: Transmission; System planning: Power purchases; System planning: Generation; System planning: Power pools; System planning: New sources; System planning/Rate base: Pools; Rate design; O&M/Planning: DSM, power costs, bad debts.

PLEASE SEE THE ATTACHED GENERAL INSTRUCTIONS, WHICH ARE A PART OF THESE REQUESTS.

Standard Data: Reports

1. Provide the annual report to the Commission for each of the following years:
 - a. the most recent year filed;
 - b. this year, if the report is completed before the end of the proceeding.

DOCUMENT
FOLDER DOCKETED
MAR 21 1995

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 2

2. Please provide each of the following FERC reports for the Company, its subsidiaries, affiliates, and/or corporate owner:

- a. Form 1 (Ann. Report - Electricity);
- b. Form 12; and
- c. Form 423 for each month in the last two complete calendar years, as well as in this year.

3. Please provide each of the following Securities and Exchange Commission reports, and amendments, for the Company, its subsidiaries, affiliates and/or corporate owner for the last year in which it was filed:

- a. Form SR (report of sales of securities and use of proceeds therefrom);
- b. Form S1 (registration statement);
- c. Form 8K (current report of changes);
- d. Form 10K (annual report);
- e. Form 10Q (quarterly report); and/or
- f. Form U5S (annual report of a public utility holding company).

4. Please provide each of the following Securities and Exchange Commission reports, and amendments, for the Company, its subsidiaries, affiliates and/or corporate owner, for the last year in which it was filed:

- a. Form SR (report of sales of securities and use of proceeds therefrom);
- b. Form S1 (registration statement);
- c. Form 8K (current report of changes);
- d. Form 10K (annual report);
- e. Form 10Q (quarterly report); and/or
- f. Form U5S (annual report of a public utility holding company).

5. Please provide each of the following Securities and Exchange Commission reports, and amendments, for the each facility in which the Company holds an equity interest and/or more than 50% of the long term debt, for the last year in which it was filed:

- a. Form SR (report of sales of securities and use of proceeds therefrom);
- b. Form S1 (registration statement);
- c. Form 8K (current report of changes);
- d. Form 10K (annual report);

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 3

- e. Form 10Q (quarterly report); and/or
- f. Form U5S (annual report of a public utility holding company).

6. First identify, and then provide, the following operating and financial reports for the Company, its subsidiaries, affiliates, and/or corporate owner, for the period indicated:

- a. monthly management reports (this calendar year through the pendency of this case);
- b. year-end management report detail (last complete calendar years) (the "fat" December management report);
- c. monthly construction reports (present year);
- d. current adopted operating budget (last two calendar years, which includes present year);
- e. current adopted construction budget (last two calendar years, which includes present year);
- f. current adopted construction budget supporting detail (last two calendar years, which includes present year);
- g. current proposed operating budget (for budget covering upcoming calendar year);
- h. current proposed construction budget (for budget covering upcoming calendar year);
- i. current proposed construction budget supporting detail (for budget covering upcoming calendar year);
- j. current responsibility budgets (for budget covering this calendar year);
- k. proposed responsibility budgets (for budget covering upcoming calendar year);
- l. current planning year estimate (i.e. post-budget year);
- m. proposed planning year estimate (i.e. post-budget year);
- n. reports of property held or acquired for future use (last two calendar years, which includes present year);
- o. report on sources and uses of funds for last full calendar year;
- p. most recent report on sources and uses of funds;
- q. reports of generation dispatched as fixed loaded units, for the purpose of fuel inventory control, system security, or other non-economic reason, or the reports' equivalent (for each of the last two complete calendar years plus this calendar year to date);
- r. monthly reports of sales to the Company's largest industrial customers (for last calendar year plus this calendar year); and/or

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 4

- s. normal maintenance percents reports or equivalent (for last calendar year and this calendar year).

Corporate planning case and model run

7. First identify, and then provide, for the Company, its subsidiaries, affiliates, and/or corporate owner the most recent planning case presentation materials, and/or that document consisting of the materials prepared for presentation to senior management to aid in the development of the Company's current, and/or presently proposed, long term corporate plan.

8. First identify, and then provide, for the Company, its subsidiaries, affiliates, and/or corporate owner the corporate planning model summary output for the most recent planning case run presentation materials, and/or that document consisting of the materials prepared for presentation to senior management to aid in the development of the Company's current, and/or presently proposed, long term corporate plan.

9. First identify, and then provide, for the Company, its subsidiaries, affiliates, and/or corporate owner the summary output for each update to the corporate planning model from the most recent planning case study plus related narrative(s). Include the page(s) of model output that permit the reader to interpret the meaning of the numbers (e.g., the column and line headings).

10. First identify, and then provide, materials which the Company officers and/or Board members presented to bond rating agencies and/or securities analysts, including transcripts of oral remarks, during the periods:

- a. 1994; and/or
- b. 1995.

This requests covers people, like the Chair of a corporate parent, who are presented as *de facto* Company officers and/or Board members.

11. First identify, and then provide, each report of the ratings of the Company's securities received by the Company within the last 12 months.

T&D audits

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 5

12. First identify, and then provide, each report of an **internal audit** of the Company's transmission and/or distribution system, and/or the units of the Company responsible therefor: since the filing of the Company's last general base rate case.

13. First identify, and then provide, each report of an **outside audit** of the Company's transmission and/or distribution system, and/or the units of the Company responsible therefor: since the filing of the Company's preceding general base rate case.

14. First identify, and then provide, each report projecting and/or proposing an audit of the Company's transmission and/or distribution system, and/or the units of the Company responsible therefor: since the filing of the Company's last general base rate case.

Affiliated transactions

15. First identify, and then provide, the documents presenting detailed, current explanation of Company transactions with associated and/or affiliated companies, describing the services performed and/or the bases for the related charges for the periods: documents generated since the filing of the Company's last general base rate case.

Assumptions: Fixed charge rate

16. First identify, and then provide, the document(s) specifying the fixed charge rate:

- a. which the Company presently uses for planning purposes; and
- b. which the Company used for calculations related to capital additions affecting the test years in this case.

Include the documentation supporting the calculations of the fixed charge rates. Please identify any differences between the rates or their calculation.

Billing inserts

page 6

17. Please provide the billing inserts sent to customers for each of the last 12 months.

18. Please provide the billing inserts sent to customers since the filing of the Company's preceding rate case which discussed DSM or energy efficiency.

Revenues/Forecast/Rate design: Rate levels, customer profile

19. Please provide the documents which discuss in summary fashion a description of the Company's rates by name or other identifier and rate/kWh, demand level(s), demand charge and/or other qualifying and descriptive characteristics. If no such document exists, please state the requested information.

20. Please provide the monthly current typical residential, industrial and commercial electricity rates for each tariff in ¢/kWh. For the residential class tariffs please also respond for usage levels of 750 kWh and 1000 kWh. Indicate the demand charge comprising each bill.

21. Please provide the monthly typical residential, industrial and commercial electricity rates for each tariff in ¢/kWh which would proceed from the granting of the Company's Application. For the residential class tariffs please also respond for usage levels of 750 kWh and 1000 kWh. Indicate the demand charge comprising each bill.

22. Please provide the most recent comparison of rates undertaken by the Company and/or in its possession which compares the Company's rates to those of other utilities within the Mid-Atlantic and/or Midwest Regions.

23. First identify, and then provide, the most recent studies of energy and peak load usage by customer class and/or type.

24. First identify, and then provide, the study, memorandum, or other summary document which, in the opinion of the Company, most accurately demographically profiles the Company's:

- a. residential customers;
- b. large commercial customers;
- c. small commercial customers;

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 7

- d. large industrial customers;
- e. small industrial customers;
- f. the economy of the Company's service territory.

Please explain how the Company has correlated this information with its load data. Provide the most recent document which discusses such correlation.

Standard Data: System Planning

25. Please provide the current system maps showing **for the Company**:

- a. all generating facilities;
- b. all transmission facilities;
- c. all distribution facilities; and/or
- d. all interconnections with other utilities;
- e. the borders of the Company's service territory.

The responses should include legible keys to reading the map symbols.

26. First identify, and then provide, **the Company** document(s) which comprehensively **describe** the Company's:

- a. all transmission facilities;
- b. all distribution facilities; and/or
- c. all interconnections with other utilities;
- d. the Company's right to serve the political subdivisions within its service territory.

The documents sought by this request are for the use of an engineer, rather than for the use of a lay person.

27. Please provide the current system map(s) showing, **for the integrated pool(s)** of which the Company is a member:

- a. all generating facilities;
- b. all transmission facilities;
- c. all distribution facilities; and/or
- d. all interconnections with other utilities.

page 8

28. First identify, and then provide, the Company document(s) which comprehensively **describe for the integrated pool(s)** of which the Company is a member:

- a. all transmission facilities;
- b. all distribution facilities; and/or
- c. all interconnections with other utilities.

The documents sought by this request are for the use of a transmission engineer, rather than for the use of a lay person.

System planning: Transmission

29. First identify, and then provide, the Company document(s) which comprehensively **discuss** each of the **arrangements** which the Company has **with other utilities**, for the transmission of electricity. This request does NOT seek the Company's transmission/interconnection contracts themselves.

30. First identify, and then provide, each **contract**, complete with all necessary amendments and/or attachments, which the Company has **with another utility(s)** for the transmission of electricity, and/or the interconnection therefor.

31. First identify, and then provide, the Company document(s) which comprehensively **discuss** each of the **arrangements** which the Company has **with other NONutilities**, for the transmission of electricity, including the wheeling of another producer's electricity. This request does NOT seek the Company's transmission/interconnection contracts themselves.

32. First identify, and then provide, each **contract**, complete with all necessary amendments and/or attachments, which the Company has **with another NONutility(s)** for the transmission of electricity, including wheeling, and/or the interconnection therefor.

33. First identify, and then provide, each **document embodying correspondence, and/or recording a communication** other than a contract and/or contract draft, complete with all attachments, which the Company has had **with another utility(s)** regarding the transmission of electricity into and/or out of the Company's system,

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 9

and/or the interconnection therefor: for each of the last three calendar years, including the present year.

34. First identify, and then provide, each **document embodying correspondence, and/or recording a communication** other than a contract and/or contract draft, complete with all attachments, which the Company has had **with another NONutility(s)** regarding the transmission of electricity into and/or out of the Company's system, and/or the interconnection therefor: for each of the last three calendar years, including the present year.

System planning: Power purchases

35. First identify each **contract**, complete with all necessary amendments and/or attachments, which the Company has **with another NONutility(s)** for the purchase of electricity, whether on a firm capacity or other basis. Please provide the Company's best summary on hand of the terms of the documents.

36. First identify, and then provide, each **tariff sheet, FERC and/or the Commission**, complete with all necessary amendments and/or attachments, applicable to the Company's arrangements **with another NONutility(s)** for the purchase of electricity, whether on a firm, capacity or other basis. Please provide the Company's best summary on hand of the terms of the documents.

37. First identify each **contract**, complete with all necessary amendments and/or attachments, which the Company has **with another utility(s)** for the purchase of electricity, whether on a firm capacity or other basis. Please provide the Company's best summary on hand of the terms of the documents.

38. First identify, and then provide, each **tariff sheet, FERC and/or the Commission**, complete with all necessary amendments and/or attachments, applicable to the Company's arrangements **with another utility(s)** for the purchase of electricity, whether on a firm, capacity or other basis. Please provide the Company's best summary on hand of the terms of the documents.

System planning: Generation

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 10

39. First identify, and then provide, the generation outages detail report for the following periods: for each of the last three calendar years, including the present year.

40. First identify, and then provide, the telemetered generation values reports for the following periods: for each of the years 1994 and 1995 to date.

41. First identify, and then provide, the documents supporting the Company's most recent calculation(s) of avoided cost(s). State the extent to which the calculation includes:

- a. avoided generating capacity costs adjusted for transmission and distribution (both primary and secondary) losses and reserve margin requirements;
- b. avoided transmission and distribution capacity costs;
- c. avoided operating costs, including fuel, plant operations and maintenance, and transmission/distribution operations and maintenance, adjusted for transmission and distribution (both primary and secondary) losses; and
- d. avoided environmental costs.

Please state the extent to which, if any, the calculations and their results differ from those relevant to the Company's filing in this case.

System planning: Power pools

42. First identify, and then provide, for the power pool(s) of which the Company is a member, the most recent **adopted** long term planning report, and its attachments.

43. First identify, and then provide, for the power pool(s) of which the Company is a member, the most recent **proposed** long term planning report, and its attachments.

44. First identify, and then provide, the North American Reliability Council reports, produced since the date two years before the Company filed this case, addressing

page 11

the adequacy of interconnections within and/or with the power pool(s) of which the Company is a member.

45. First identify, and then provide, the load flow analysis reports, cover letters and/or other transmittals, and attachments, generated for the Company's system since the date two years before the Company filed this case.

System planning: New sources

46. First identify, and then provide, each report, study, memorandum or other writing which addresses the acquisition of new sources of energy for any period following the conclusion of the Company's last base rate case.

47. First identify, and then provide, each solicitation for a new source of energy for any period following the conclusion of the Company's last base rate case.

48. First identify, and then provide, the most definitive document which the Company has produced regarding the factors to be used in evaluating new sources of energy for any period following the conclusion of the Company's last base rate case.

System planning/Rate base: Pools

49. First identify and then provide each document containing a discussion of: the extent to which the Company's generating and T&D resources, are valued with a pool-wide perspective. The discussion might include the relative value to other pool members, with special reference to those in Pennsylvania, of the utility's capacity and other resources presently or prospectively considered excess for the utility itself; or, conversely, the value to it of other utilities' "excess" resources. The discussion might include an analysis of the relative costs and benefits of more fully utilizing the existing resources.

50. First identify and then provide the most recent documents discussing the Company's energy production and/or transmission resources for purposes of determining current and/or future responsibilities to the pool(s) of which the Company is a member.

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 12

Rate design

51. First identify, and then provide, each communication since the filing of the Company's preceding base rate case, or record or summary of such communication, to and/or from each large industrial or commercial customer regarding the development of:

- a. an alternative tariff;
- b. a discount, or other reduction in bills or rates;
- c. the provision of services to assist in lowering bills; and/or
- d. transmission of power generated by another entity.

52. Please explain the extent to which the proposed rate design for each major customer class is, or is not, consistent with the Company's most recently-filed ARPR.

53. First identify and then provide a copy of each tariff submitted to and/or approved by the Commission since the Company prepared the filing in this case. Include each document which describes and/or summarizes the tariff, including any related Commission orders and/or correspondence from Commission employees.

O&M/Planning: DSM, power costs, bad debts

54. Provide a copy of:

- a. the Company's most recent DSM program filing;
- b. the Company's most recent Commission-approved DSM program.

If we have already been sent a copy of either document in another docket, please indicate, *in lieu* of providing the document, that such document responds to this question.

55. Please identify in organizational chart form, those Company employees and contractors responsible for the development and conduct of the Company's DSM programs.

56. Provide the budget (or budget estimate if no budget is developed yet) for each demand-side program for each year of the program's projected life. Include in your response the backup to the budget figures, including administrative costs, incentive

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 13

payments, rebates, evaluation costs. If no such backup is available, please give a narrative explaining how you have generated your budget (budget estimates).

57. State the rate impact for the Company's current (or currently-proposed) DSM plan on a year-by-year, and rate-class-by-rate-class, basis. Provide the backup for the calculations.

58. With respect to the impact of your current (or currently proposed) DSM plan on the cost of environmental compliance strategies:

- a. Please identify and provide each document containing a discussion of such impact, and the attachments thereto.
- b. If such impact is not discussed in any document, please describe the extent to which the Company has considered such impact, including the numbers.

59. First identify and then provide the document(s) containing the Company's most recent comprehensive description(s) of its low income demand side programs (e.g. LIURP).

60. First identify and then provide the most recent document(s) containing a comprehensive discussion of the Company's low income DSM programs' costs and benefits, including changes in bad debts among the Company's customers over the life of the program.

61. First identify and then provide the Company's most recent analysis of its low income demand side programs' (e.g. LIURP):

- a. costs; and/or
- b. benefits, including any analysis of reductions in uncollectibles.

62. If the Company has not performed an analysis to determine the effect of its low income DSM programs on uncollectibles, please identify, and then provide:

- a. the information necessary to perform such analysis.
- b. Please include an explanation of:

Sierra Club's Data Requests to PP&L
Data Request: 1st

page 14

- i. how the Company believes such an analysis should be performed, and
 - ii. the limitations or other problems in using the available data.
- c. Please explain why the Company has not conducted such an analysis.

Respectfully submitted,

Alan J. Barak,
Attorney for Sierra Club

Alan J. Barak
Mid-Atlantic Energy Project
Widener Energy Law Clinic
3700 Vartan Way
Harrisburg PA 17110

717/541-1967 (voice)
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Dated: March 10, 1995

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COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility)
Commission)
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(General rate increase request))

SIERRA CLUB'S DATA REQUESTS
TO PP&L: SET 2 (Q's 1 - 35)

Dated: March 10, 1995

Subjects: Planning/O&M - Environmental control costs; O&M/Planning: Generation costs; Planning: Avoided cost; Load forecast/DSM - new construction; Load forecast/DSM - renovations; Planning/Rate levels: DSM; Planning/O&M - Nuclear compliance.

PLEASE SEE THE ATTACHED GENERAL INSTRUCTIONS, WHICH ARE A PART OF THESE REQUESTS.

Planning/O&M - Environmental control costs

1. Please identify, and/or provide the documents which identify, in organizational chart form, those Company employees and contractors responsible for environmental control and/or compliance.

2. With respect to the filing's projected capital expenditures deemed necessary to meet future Clean Air Act requirements:

- a. Please identify each of the assumptions supporting the projections;
- b. First identify, and then provide, each of the Company's standard reference data sheets supporting each of the assumptions.

3. Please specify pollution-control-related capital expenditures at each generating unit:

Sierra Club's Data Requests to PP&L
Data Request: 2nd

page 2

- a. total per unit; and separately for
- b. NOx requirements;
- c. SO₂ requirements;
- d. toxics/particulates; and
- e. other compliance requirements.

4. For each generating unit, please provide BOTH the dollar value and unit cost in mills/kWh:

- a. required return on investment;
- b. required return of investment;
- c. allocated administrative and general expenses;
- d. other fixed O&M;
- e. fuel;
- f. other variable O&M;
- g. taxes:
 - i. federal taxes;
 - ii. state taxes;
 - iii. local taxes;
 - iv. taxes due to generation at the unit;
 - v. property taxes;
 - vi. other taxes;
- h. depreciation expense;
- i. total operating cost.

Please provide the information requested for each of the two years preceding the filing, the year of the filing, and for each of the historical and future test years. If some of these data exist only at the station level, please so state and provide as much data as available. Provide reports and/or standard reference data sheets containing the requested information.

5. First identify, and then provide, the Company's most comprehensive analysis of proposed compliance with Title IV of the Clean Air Act Amendments of 1990.

6. First identify, and then provide, those documents which show each of the following:

- a. Planned operation levels of all facilities affected under either Phase I or II of Title IV of the Clean Air Act;

Sierra Club's Data Requests to PP&L
Data Request: 2nd

page 3

- b. The expected emission reductions required under both phases of Title IV of the Clean Air Act;
- c. An assessment of the least-cost means of achieving this reduction, including consideration of:
 - i. Fuel-switching (e.g., oil to gas, high-sulphur to low-sulphur coal, and coal to gas);
 - ii. Retrofit of pollution control devices;
 - iii. Energy-efficiency improvements; and
 - iv. Purchase or sale of emission allowances.
- d. With respect to all existing utility-owned, supply-side resources, identification and description of such resources including:
 - i. Name and location;
 - ii. Rated capacity and net dependable capability;
 - iii. Equivalent availability factors and capacity factors;
 - iv. Applicable heat rates;
 - v. Specification and description of fuel types, including, with respect to resources using coal, description of the quality of the coal(s) used;
 - vi. Expected remaining useful life;
 - vii. The range of projected fuel prices, including at least high, base, and low estimates, and justification thereof;
 - viii. Fixed and variable costs of producing energy; and
 - ix. Emission rates (expressed in pounds emitted per kWh generated) of the following pollutants:

page 4

1. oxides of sulphur;
 2. oxides of nitrogen and nitrous oxides;
 3. carbon dioxide;
 4. carbon monoxide;
 5. volatile organic hydrocarbons;
 6. particulates;
 7. methane;
 8. Chlorofluorocarbons and other ozone-depleting substances;
and
 9. air toxics, as defined in Title III of the Clean Air Act.
- x. A description of the impacts on land (including solid-waste disposal) and water resources.

7. With respect to the Clean Air Act Amendments of 1990, as addressed just above, question 55, and existing supply-side resources not owned by the Company, first identify, and then provide, the most recent documents most comprehensively identifying and describing these resources, and to the extent possible, including name, fuel type, contract capacity, remaining life of the contract, cost per megawatt and per megawatt-hour and, where feasible, emission of pollutants and land and water impacts as specified just above, in question 55.

8. Please identify the most recent documents in the Company's possession or control discussing:

- a. the role of existing Company-owned resources as future resources;
- b. options for meeting load during the integrated resource (ARPR) planning period;
 - i. specifically, potential new utility-owned generating facilities;
 - ii. potential new non-utility-owned generating facility options;

Sierra Club's Data Requests to PP&L
Data Request: 2nd

page 5

- c. improvements in the efficiency of supply of electricity;
- d. a quantitative assessment of the risk of further environmental, health, or safety regulation, and/or the Company's best estimates as to the costs and technical feasibility of complying with such regulation;
- e. new transmission resources;
- f. loss of control of the Company's presently-owned transmission resources;

9. First identify, and then provide, the document(s) containing the most comprehensive discussion of the role of existing Company-owned resources as future resources, including a discussion of the potential costs of, and schedules for, repowering, fuel switching, and life extension.

10. First identify, and then provide, with respect to potential new utility-owned generating facilities, the document(s) containing the most comprehensive identification and description of options for meeting load during the integrated resource (ARPR) planning period, including:

- a. With respect to any new supply-side resource project already identified, the information for these resources as specified in question 55, as well as construction cost, construction schedule, and expected in-service date; and
- b. With respect to other new supply-side resources, those documents in the Company's possession or control which address, in whole or in part, the potential for development of these options by technology and fuel type, the likely costs of construction and production (including a range of projected fuel prices), environmental impacts, and availability of these options during the planning period.

11. First identify, and then provide, with respect to potential new non-utility-owned generating facility options likely for the integrated resource (ARPR) planning period, document(s) containing the most comprehensive description of the potential for such facilities by technology and fuel type, addressing the likely amounts of capacity and energy available from such facilities at the price or price rule assumed in the analysis, the environmental impacts of such facilities, and the availability of such capacity and energy during the planning period.

12. First identify, and then provide, the most comprehensive document in the

page 6

Company's possession or control discussing improvements in the efficiency of supply of electricity during the integrated resource (ARPR) planning period.

13. First identify, and then provide, with respect to new resource-related transmission-related investments, the most comprehensive document in the Company's possession or control discussing the potential costs of, and schedules for, such investments, including the location of the investment and derivation of the resource capability that such investment is intended to add to the system during the integrated resource (ARPR) planning period.

14. First identify, and then provide, with respect to all existing utility-owned, supply-side resources, the most comprehensive document in the Company's possession or control discussing a quantitative assessment of the risk of further environmental, health, or safety regulation, and/or the Company's best estimates as to the costs and technical feasibility of complying with such regulation.

15. For each generating unit state the dollar value of capital additions at the units. Include a brief description and the dollar cost of each significant capital addition at each unit, identifying expenditures made that are necessary to meet future Clean Air Act requirements. Please provide the information requested for each of the two years preceding the filing, the year of the filing, and for each of the historical and future test years.

O&M/Planning: Generation costs

16. Please specify for each unit in operation for the year:

- a. the hours connected to load;
- b. the outage hours, disaggregated by
 - i. scheduled outage hours; and
 - ii. forced outage hours;
- c. the total generation;
- d. capacity factor.

Please provide the information requested for each of the two years preceding the filing, the year of the filing, and for each of the historical and future test years.

Sierra Club's Data Requests to PP&L
Data Request: 2nd

page 7

17. For each projected life extension project for each generating unit first identify, and then provide:

- a. identification of the project;
- b. cost estimate;
- c. levelized rate impact;
- d. projected kW gain or preservation;
- e. a copy of the summary project report or backup that sets out the projected expenditures.

18. First identify, and then provide, each plan and/or proposal for mothballing and/or early retirement of any of the Company's generating units.

19. First identify, and then provide, each plan, proposal, and/or other writing addressing the termination of any of the Company's power purchase contracts.

Planning: Avoided cost

20. Please provide the Company's calculated avoided costs for **generating** capacity for each year of the Company's most recent integrated resource plan (ARPR). Please also provide the assumptions and workpapers supporting the calculation.

21. Please provide the Company's calculated avoided costs for **transmission** capacity for each year of the Company's most recent integrated resource plan (ARPR). Please also provide the assumptions and workpapers supporting the calculation.

22. Please provide the Company's calculated avoided costs for **distribution** capacity for each year of the Company's most recent integrated resource plan (ARPR). Please also provide the assumptions and workpapers supporting the calculation.

Load forecast/DSM - new construction

23. First identify, and then provide, documentation showing for each of **the last three calendar years, including this year**, in the Company's service territory:

Sierra Club's Data Requests to PP&L
Data Request: 2nd

page 8

- a. housing starts, single family;
- b. housing starts, multi-family;
- c. commercial new construction, by square footage and/or other measure;
- d. industrial new construction, by square footage or other measure.

24. First identify, and then provide, documentation showing the basis for projections of **the future test year's** Company service territory:

- a. housing starts, single family;
- b. housing starts, multi-family;
- c. commercial new construction, by square footage and/or other measure;
- d. industrial new construction, by square footage or other measure.

25. First identify, and then provide, documentation showing the basis for projections of **the integrated resource plan period's (ARPR's)** Company service territory:

- a. housing starts, single family;
- b. housing starts, multi-family;
- c. commercial new construction, by square footage and/or other measure;
- d. industrial new construction, by square footage or other measure.

Load forecast/DSM - renovations

26. First identify, and then provide, documentation showing for each of **the last three calendar years, including this year**, in the Company's service territory:

- a. renovations, single family;
- b. renovations, multi-family;
- c. commercial renovation, by square footage and/or other measure;
- d. industrial renovation, by square footage or other measure.

27. First identify, and then provide, documentation showing the basis for projections of **the future test year's** Company service territory:

- a. renovations, single family;
- b. renovations, multi-family;
- c. commercial renovation, by square footage and/or other measure;
- d. industrial renovation, by square footage or other measure.

Sierra Club's Data Requests to PP&L
Data Request: 2nd

page 9

28. First identify, and then provide, documentation showing the basis for projections of **the integrated resource plan period's (ARPR's)** Company service territory:

- a. renovations, single family;
- b. renovations, multi-family;
- c. commercial renovation, by square footage and/or other measure;
- d. industrial renovation, by square footage or other measure.

29. For the Company's current DSM plan, please state in ¢/kWh, and provide workpapers for your calculation of,

- a. the weighted lifetime average cost;
- b. the cost for the historical test year;
- c. the cost for the future test year.

Planning/Rate levels: DSM

30. Describe how and the extent to which DSM forms a part of the Company's competitive and customer retention strategies.

31. First identify, and then provide, those writings approved by senior management within the last three calendar years (which includes this year) addressing the extent to which DSM forms a part of the Company's competitive and customer retention strategies.

32. First identify, and then provide, the Company's projections of the change in average bills and rates due to the implementation of its current DSM plan.

33. First identify, and then provide, the Company's current calculation(s) of the benefits of DSM informational programs.

34. First identify, and then provide, the amount of capacity (generating, transmission, and/or distribution) to be avoided through the execution of the Company's current DSM plan.

Planning/O&M - Nuclear compliance

Sierra Club's Data Requests to PP&L
Data Request: 2nd

page 10

35. With respect to the Company's nuclear production, storage, disposal, and/or reporting, please identify, and/or provide the documents which identify, in organizational chart form, those Company employees and contractors responsible for

- a. production;
- b. other O&M, including fuel, waste storage and waste disposal;
- c. regulatory control and/or compliance;
- d. QA and/or QC activities;
- e. regulatory reporting;
- f. communications and/or public affairs.

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GENERAL INSTRUCTIONS

- A. No specific response is requested to these general instructions. These instructions apply to each of the Sierra Club's data requests.
- B. Under oath. Please provide the answers to these requests separately and under oath. Each response should be signed by the person, other than the attorney, making the response. When a person providing a response is not contemplated as a witness in this case, please identify the person at the Company who can competently testify to the matters contained in the response.
- C. Time. Please provide the responses to these requests as soon as possible, and in no event later than the time required under the Commission's Rules.
- D. Continuing requests. These are continuing requests. When information responsive to them becomes available, please provide it, even though an earlier response has been given. Please supplement these requests when information becomes available and/or known which has not been provided in your prior responses.
- E. Electronic form. When requested information is available in electronic form, please provide the information in BOTH hard copy and electronic form. However, if such computerized information is lengthy, or it would be time-consuming or expensive to convert it to hard copy, please discuss whether providing a diskette would be suitable.
- F. Data. Please provide data, calculations, spreadsheet information, and the output of databases in both hard copy and IBM PC readable form, including Lotus, Dbase, WordPerfect, on 3-1/2" 1.44 MB diskettes or equivalent.
- G. Identify responses. Please indicate the preparer of each response, his or her department, and job title, and the witness who could competently answer cross examination questions thereon.
- H. Privilege or immunity from discovery. If the Company resists discovery of information based upon a claim of, among other things, a privilege, exemption or immunity, please identify the information being withheld with as much specificity as possible without waiving the claim. This may include redacting those portions of a document subject to the claim, providing the redacted document, and describing the redacted portion separately.
- I. Ambiguities, etc. If there is any doubt as to the meaning of any of the instructions or requests please discuss. If any of the requests pose logistical difficulties, please discuss.
- J. Applicability. These general instructions, and the Definitions, apply to all of Sierra

Club's requests in this docket, including interrogatories and requests to produce.

K. Numbering of responses. If the Company uses a standard, additional, numbering system for its responses, please provide an annotated version of the requests as soon as you have assigned response numbers. E.g., our Q no. 35a, 35b, and 35c, might become 05-ST-72, 05-ST-73, and 05-ST-74, where the "05" are the last two digits of the docket number and "ST" refers to the Staff.¹

L. Refusal to provide. If the Company declines to provide the requested document in response to one of the Requests please state specifically the reasons therefor, including whether the Company, including its employees and/or agents, lacks the requested document in its possession or control or whether the response is too voluminous. Where a refusal includes "voluminous", please state whether the bulk of the information is NOT available electronically.

M. ADDITIONAL COPY. We would appreciate your sending a second copy of your responses to the following person: Sierra Club Consultant c/o Alan J. Barak, Mid-Atlantic Energy Project, Widener University School of Law, 3700 Vartan Way, Harrisburg PA 17110. (We will separate and forward responses.)

DEFINITIONS

1. "Backup" includes, but is not limited to, workpapers, calculations, lists of assumptions, transmittal memos containing calculations and/or assumptions, copies of source materials, and other detailed information in documents supporting a calculation, conclusion and/or discussion which to the maximum extent possible assist in the reproduction of the calculation, conclusion and/or discussion.

a. "The Commission", unless otherwise stated, means the Pennsylvania Public Utility Commission.

b. "The Company" is the utility company filing the Application which is the subject of this docket, its parent, affiliates, and subsidiaries.

c. "Discuss", "discusses", "discussion", and variations thereof, include, but are not limited to, the concept of discussing or addressing in whole OR in part. The

¹ It would help the office staff of all parties if they could begin numbering file folders with the response numbers well before documents began arriving.

terms are NOT restricted to the concept of a document which is intended to address in its entirety the one subject mentioned. So, for example, a memo which addresses three topics, one of which is mentioned in the Request, comes within the scope of the request.

d. "Document" includes, but is not limited to, hard copy and electronic information.

e. "E.g." means "for example" or "for instance", and these terms are meant to illustrate, and not to limit.

f. "Electronic information" includes, but is not limited to, information which may be generated as a writing, stored on a diskette, a hard disk, a laser disk, computer tape, or in a form otherwise accessible by a computer.

g. "Identify", "identity", "identification" and, variations thereof, include the following:

i. With respect to a document: the originator and addressee(s), the subject matter, the date, the document's present location, the custodian of the document, and any unique alphanumerical identifier (e.g. if Bates-stamped, the Bates number).

ii. With respect to a person: the full name, employer, business address, telephone number, and job title.

iii. Any other information that would permit the specific identification of the document or person for a subpoena.

h. "Include" or "includes", and variations thereof, are terms of inclusion, not of exclusion. At each point used in these Requests the terms must be read as "include(s) but is not limited to", even if the phrase "but is not limited to" does not appear along with them.

i. "In particular" or "for example" or "for instance" are terms of inclusion, not of exclusion. At each point used in these Requests the terms must be read to indicate a possible conforming response, not the only conforming response.

j. "Person" includes natural and artificial persons, including but not limited to individuals, corporations, partnerships, sole proprietorships, and trustees.

k. "Plant" INCLUDES, but is not limited to, the structure, boilers, generators,

cables, access roads, transmission facilities and other facilities related to a generating, transmission, distribution or other physical installation.

I. "Writing" includes, but is not limited to, memorandum, note, summary, letter, message, book, looseleaf notebook, report, specification, diagram, sketch, map, plan or other document, whether in hard copy or other form.

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility)
Commission)
)
v.)
)
Pennsylvania Power & Light Co.)
(General rate increase request))

Docket No. R-000943271

CERTIFICATE OF SERVICE

I hereby certify that I have this, the 10th day of March, 1995, served a true copy of the foregoing documents, Set 1 and Set 2 of the Sierra Club's Data Requests to Pennsylvania Power & Light Company, upon the following parties of record to this proceeding by First Class Mail, addressed as follows:

John J. Alford, Secretary
PA Public Utility Commission
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Harrisburg, PA 17120

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Harrisburg, PA 17101

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Widener University Energy Law Clinic
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Pennsylvania Power & Light Company

ORIGINAL

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

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

FAX: 610/774-6726

KJR

March 13, 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 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

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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 III numbered 1 through 9 upon the
active participants listed below, in accordance with the requirements of § 1.54
(relating to service by a participant):

HAND DELIVERED

DOCKETED
MAR 27 1995

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Assistant Consumer Advocate
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Bernard A. Ryan, Jr., Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
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Harrisburg, Pennsylvania 17101

**DOCUMENT
FOLDER I**

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Pennsylvania Public Utility Commission
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Harrisburg, Pennsylvania 17105-3265

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Energy Services Manager
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211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596



Paul E. Russell

Dated: March 13, 1995
at Allentown, Pennsylvania



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

KJR

IN REPLY PLEASE
REFER TO OUR FILE

March 13, 1995

DOCKETED

MAR 15 1995

PA. P. U. C. DIV.
ADMIN. CONTROL

95 MAR 14 AM 11:28

RECEIVED

John M. Quain, Chairman
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Chairman Quain:

The purpose of this letter is to bring to the attention of the Commissioners and the active parties in this case a scheduling problem that has surfaced since the prehearing conference. It is my hope that by sending this letter major schedule disruptions can be avoided in this case, and in future cases.

This case was assigned to me on January 20, 1995, when the Office of Administrative Law Judge (OALJ) informed the parties by letter that the prehearing conference would be held on March 7, 1995. Also, by memorandum dated that same day, the Chief Administrative Law Judge (CALJ) asked the Bureau of Public Liaison (BPL) to coordinate the scheduling of public input hearings. A copy of the CALJ's memo to the Director of the BPL is enclosed with this letter. As is my custom, on January 27, 1995, I issued to the parties a prehearing order describing my schedule, and the briefing and close of record dates for the case, so that the parties could come to the prehearing conference with a negotiated schedule. Subsequently, BPL became involved in the case and I later was informed by the parties that a series of dates for the public input hearings had been identified.

At the prehearing conference, a comprehensive schedule was developed encompassing the public input hearings, testimony filing dates, and evidentiary hearing dates (a copy of the litigation schedule is enclosed). As is customary, an attempt was made to schedule the public input hearings between the cross examination of the company's testimony and the submission of testimony by the opposing parties so that the opposing parties could incorporate issues raised during the public input

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hearings in their own testimony. The public input schedule also was developed to reduce as much as possible the travel time and expense of all the participants who would be attending many public input hearings spread over a wide geographical area within a short period of time. The schedule was developed with some difficulty because of the many days of evidentiary hearings and many days of public input hearings required by the size and nature of the proceeding. The prehearing conference was attended by a representative of BPL who brought to my attention only one particular schedule date requested by a Commissioner. (Thursday in Allentown) (Tr. 13).

By prehearing order issued on May 8, 1994, I adopted the schedule developed at the prehearing conference. I then learned that, contrary to OALJ expectations, BPL did not coordinate the public input schedule with the individual Commissioners. To date, OALJ has had requests from two Commissioners for changes to the public input schedule. Specifically, a Commissioner has asked that a second public input hearing be held in Lancaster on the afternoon of March 31, 1995. A second Commissioner initially sought a change in the date for the public input hearing scheduled for Scranton, but has since withdrawn that request.

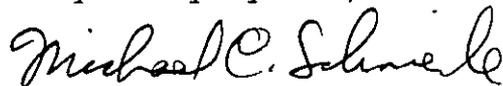
I am very reluctant to schedule additional public input hearings in this case because the schedule already is quite heavy. While public input hearings are an important part of the process, the parties, particularly those opposing the rate increase, must have time to develop their written testimony. The amount of time for that activity already is quite limited. The addition of more public input hearings will simply further reduce that limited time.

At this time, the CALJ has directed that an additional public input hearing be held in Lancaster as requested. If there are additional requests from the Commissioners for changes to the public input schedule, I would appreciate that they be communicated to me as soon as possible. Any further changes may require the convening of a second prehearing conference so that the parties may have an opportunity to provide input to the rescheduling process.

Finally, I would like to suggest a way of avoiding this problem in the future. As previously noted, when I receive an assignment of a major rate case, I alert the parties very early in the process to my

schedule. I would be more than willing to contact the Commissioners' offices to learn of any potential scheduling requests they might have regarding public input hearings, and to include those scheduling requests in my prehearing order. The parties would then have better information to develop a comprehensive schedule for presentation at the prehearing conference. I also would be willing to contact the Commissioners' offices to learn of scheduling conflicts immediately prior to the prehearing conference. Other parties should be directed to contact the parties or the ALJ with their public input hearing suggestions. This would permit the development at the prehearing conference of a comprehensive schedule of both evidentiary and public input hearings that would require no further adjustment. I believe that this would be a more effective and efficient manner of scheduling the public input hearings than was followed in this case. I also recommend that if any specific procedure is adopted it be committed to writing so that all parties are aware of their responsibilities.

Very truly yours,



MICHAEL C. SCHNIERLE
Administrative Law Judge

cc: Vice Chairman, Joseph Rhodes, Jr.
Commissioner David W. Rolka
Commissioner Lisa Crutchfield
Commissioner John Hanger
John L. Dial, Executive Director
Allison K. Turner, Chief Administrative Law Judge
Kevin F. Cadden, Director of
Bureau of Public Liaison
Active Parties List
New Filing

APPENDIX A

R-00943271, R-00943271C0001-C0127 Pennsylvania Public Utility
Commission v. Pennsylvania Power and Light Company

Active Parties List

Johnnie E. Simms, Esquire
Kenneth L. Mickens, Esquire
Stephen Gorka, Esquire
PA PUC - Office of Trial Staff
Pitnick Bldg. - 3rd. Floor
PO Box 3265
Harrisburg, PA 17105-3265

Joan O. Brandeis, Esquire
Suite 3600
1600 Market Street
Philadelphia, PA 19103-4252

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

D. Jane Drennan, Esquire
1216 16th. Street N.W.
Washington, DC 20036

Tanya M. McClosky, Esquire
Mary C. Kenny Esquire
Gincine P. Brignola, Esquire
425 Strawberry Square
Harrisburg, PA 17120

Karen Oill Moury, Esquire
Assistant Small Business Advocate
Suite 1102 Commerce Building
300 N. 2nd. Street
Harrisburg, PA 17101

David M. Kleppinger, Esquire
McNees Wallace and Nurick
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166

David A. McCormick, Esquire
General Attorney
Office of the Judge Advocate General
901 N. Stuart Street
Arlington VA 22203-1837

APPENDIX A

Craig Kuennen
Commission on Economic Opportunity
211 S. Main Street
Wilkes Barre, PA 18701-1596

Alan J. Barak, Esquire
Mid Atlantic Energy Project
Energy Law Clinic
3700 Vartan Way
Harrisburg, PA 17110

James P. Melia, Esquire
240 North Third Street
Harrisburg, PA 17101-1507

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

Robert P. Haynes, III, Esquire
Mette, Evans & Woodside
3401 N. Front Street
Harrisburg, PA 17110-0950

Wayne M. Thomas, Esquire
1101 Market Street, 24th. Floor
Philadelphia, PA 19107

Stephen J. Selden, Esquire
Bethlehem Steel Corporation
Bethlehem, PA 18016

Eric Joseph Epstein
2308 Brandywine Drive
Harrisburg, PA 17110

MEMORANDUM

Commonwealth of Pennsylvania

DATE: January 20, 1995

SUBJECT: R-00943271; Pa. P.U.C. v. PP&L

TO: Kevin Cadden, Director
Bureau of Public Liaison

ALJ Michael C. Schnierle

FROM: Allison K. Turner, Chief
Office of Administrative Law Judge

AKT

At the beginning of the Bell Chapter 30 proceeding at Docket No. P-00930715, the primary parties interested in the public input process worked with the Bureau of Public Liaison to arrive at recommended dates and locations of the hearings, the kind and amount of publicity, the wording and size of newspaper ads, etc. As I remember, the result was provided to me, and I issued a prehearing order adopting it with very few changes, such as adding one hearing location.

As I remember, the Commission's final order in the Bell case directed that OALJ and BPL adopt and repeat this process in other appropriate cases. I think that the PP&L rate increase is such a case. In that process, BPL took the lead.

There were several benefits to OALJ from this process. First, I think your office was helpful in providing assistance to our scheduler in arranging for locations and facilities. Second, it minimized rescheduling and additional scheduling because most stakeholders had a chance to have their needs addressed. Third, I think the public really benefited from the coordinated public information campaign. It established detailed plans early enough to be carried out successfully.

Please discuss this matter between yourselves and form a general agreement on procedure for establishing a group of parties to work together, and for presenting results to the ALJ.

I would suggest that you notify the Community Advisory Council of your plans, and that Allentown groups and/or representatives be included.

If you have any questions or comments, please contact me.

AKT:gdp

pc: Chairman Rolka
Vice Chairman Rhodes
Commissioner Quain
Commissioner Crutchfield
Commissioner Hanger
Deputy Director Hofmann
Bureau Director Cheryl Walker Davis
Rohrbaugh/Lewis/Weaver

PP&L Litigation Schedule

<u>Event</u>	<u>Date or Due Date</u>
Cross-Examination of Company Witnesses	March 21, 23, 24, 27-29, 1995
Opposing Parties except OTS File Direct Testimony Rate of Return and Generating Capacity Cost of Service, Rate Structure and Rate Design	April 7, 1995
General Accounting and all other issues	April 12, 1995
	April 14, 1995
OTS Files All Direct Testimony	April 14, 1995
Cross-Examination of Opposing Party Witnesses	April 25-28, May 2-3, 1995
Company Files Rebuttal Testimony Rate of Return and Generating Capacity Cost of Service, Rate Structure and Rate Design	May 5, 1995
	May 9, 1995
Company Files Rebuttal Testimony (continued) General Accounting and all other issues	May 12, 1995
Rebuttal to OTS Direct	May 12, 1995
Opposing Parties File Surrebuttal Testimony Rate of Return	May 17, 1995
All Other Issues	May 19, 1995
Cross-Examination of Rebuttal/Surrebuttal Witnesses, Rejoinder Testimony and Close of Record	May 22-26, 1995
Main Briefs Due	June 15, 1995
Reply Briefs Due	June 26, 1995

Public Input Session Schedule

Location

Date and Time

Harrisburg

March 30, 1995, afternoon (1:30 PM)
and evening (7:00 PM)

Location

Date and Time

Lancaster

March 31, 1995, evening (7:00 PM)

Williamsport

April 3, 1995, evening (7:00 PM)

Scranton & Wilkes-Barre

April 4, 1995, one session each in
the afternoon (1:30 PM) or evening
(7:00 PM)

Hazleton

April 5, 1995, afternoon (1:30 PM)

Pottsville

April 5, 1995, evening (7:00 PM)

Allentown & Bethlehem

April 6, 1995, one session each in
the afternoon (1:30 PM) or evening
(7:00 PM)



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

KJR

March 13, 1995

RECEIVED
95 MAR 15 AM 8:11
PA. P. U. S. DIV.
INFO. CONTROL

The Honorable Joseph M. McDade
United States House of Representatives
2107 Rayburn Office Building
Washington, D.C. 20515

Dear Congressman McDade:

Thank you for your March 1 letter to the Chairman and the enclosed letter from your constituent, Mr. Charles Lindstedt, expressing his opposition to Pennsylvania Power and Light Company's rate increase request docketed at R-943271. The Commissioners and staff are prohibited by statute from commenting on the merits of an on-the-record proceeding.

At Public Meeting on January 26, 1995, the Commissioners voted to institute a formal investigation of the proposed general rate increase, noting that the tariff will be suspended by operation of law for a period not to exceed seven months from February 28, 1995.

I have forwarded a copy of your correspondence to the Secretary's Bureau for inclusion in the official file on the proceeding.

I hope this information is helpful to you. If I can be of any further assistance, please advise.

Sincerely,

Kevin F. Cadden, Director
Bureau of Public Liaison

pc: Secretary's Bureau ✓

DOCUMENT
FOLDER

JOSEPH M. McDADE
10TH DISTRICT, PENNSYLVANIA

DISTRICT OFFICES:

- SCRANTON LIFE BUILDING
538 SPRUCE STREET
SUITE 514
SCRANTON, PA 18503
(717) 346-3834
FAX (717) 346-8577
- HERMAN SCHNEEBELI FEDERAL BUILDING
240 W. THIRD STREET
SUITE 230
WILLIAMSPORT, PA 17701
(717) 327-8161
FAX (717) 327-9359

COMMITTEE:
APPROPRIATIONS

SUBCOMMITTEES:
DEFENSE
INTERIOR

**Congress of the United States
House of Representatives
Washington, DC 20515**

March 1, 1995

- WASHINGTON OFFICE:
2107 RAYBURN OFFICE BUILDING
WASHINGTON, DC 20515
AREA CODE (202) 225-3731
FAX (202) 225-9594

RECEIVED

MAR 3 1995

CHAIRMAN ROLKA

The Honorable David Rolka
Chairman
Public Utility Commission
North Office Building, P.O. Box 3264
Harrisburg, Pennsylvania 17105-3265

Dear Chairman Rolka:

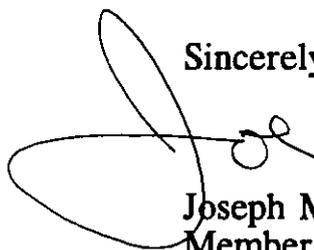
Mr. Charles Lindstedt of Stroudsburg, Pennsylvania, has contacted me regarding his opposition to the proposed electric rate hike for the Pennsylvania Power and Light Company. Enclosed please find a copy of that document.

It would be greatly appreciated if you would include Mr. Lindstedt's remarks as part of the permanent public record in opposition to the rate change. I look forward to hearing from you regarding this important matter.

Thank you for your cooperation. If I can provide further information regarding this request, please do not hesitate to contact me.

With personal regards, I am

Sincerely,



Joseph M. McDade
Member of Congress

JMM:jo

DOCKETED

MAR 16 1995

**DOCUMENT
FOLDER**

RECEIVED BY

FEB 16 1995

JOSEPH M. McDADE, M.C.

Charles Lindstedt
4496 Stroudsmoor Road
RD 4 Stroudsburg, Pa. 18360
February 8, 1995

Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, Pa. 17105-3265

Subject: PP&L requested rate change

Gentlemen;

I have been notified of a proposed electric rate change by PP&L Co. and would like to voice my objection and related comments.

PP&L was very persuasive at the time I built my house in using electric power for heat as well as for hot water, in fact, to make my house a total electric home. They assisted me in the design of the house with heating component and insulation suggestions. When the house was completed in 1980 they inspected it and issued me a certificate declaring me a member in good standing of the National Energy Watch and issuing a sticker to apply in a window stating the same. Now they have a proposal in front of you requesting a rate increase of approximately 20% for residential use of electricity. My average kw use over the past 14 years has been 17,413 kw and last year it was 18,933 kw. This would compute out an increase of approximately \$296.00 over last year. Since my wife and I are retired and living on a fixed income with only cost of living raises amounting to less than 3 % and that being deferred several months, it hardly seems fair or equitable for residential users, retired or not, to carry such a large burden of increase. There is no way retired persons with fixed incomes can pass along an increase of this magnitude.

I appeal to you to consider the plight of so many of our Pennsylvania neighbors that are in the same situation and those that in fact are in a worse financial condition.

Respectfully



cc: Senator Arlen Specter
Congressman Joseph M. McDade
Honorable Joseph Battisto

MCNEES, WALLACE & NURICK

ATTORNEYS AT LAW

KJR

100 PINE STREET

P. O. BOX 1166

HARRISBURG, PA 17108-1166

TELEPHONE (717) 232-8000

Fax (717) 237-5300

OF COUNSEL

ROBERT H. GRISWOLD

SAMUEL A. SCHRECKENGAUST, JR.

March 13, 1995

BRUCE D. BAGLEY
TERRY R. BOSSERT
ALAN R. BOYNTON, JR.
ERIC L. BROSSMAN
ROBERT M. CHERRY
WILLIAM A. CHESNUTT
DAVID B. DISNEY
MICHAELA. DOCTROW
ELIZABETH A. DOUGHERTY
HARVEY FREEDENBERG
JAMES L. FRITZ
FRANCIS B. HAAS, JR.
W. JEFFRY JAMOUNEAU
MICHAEL G. JARMAN
DAVID M. KLEPPINGER
BERNARD A. LABUSKES, JR.

DELANO M. LANTZ
RICHARD R. LEFEVER
DAVID E. LEHMAN
CLYDE W. MCINTYRE
FRANKLIN A. MILES, JR.
ROBERT A. MILLS
STEPHEN A. MOORE
HERBERT R. NURICK
JOHN S. OYLER
TIMOTHY J. PFISTER
GARY A. RITTER
EDWARD W. ROTHMAN
DANA STEVENS SCADUTO
ROBERT D. STETS
RICHARD W. STEVENSON
DIANE M. TOKARSKY

DAVID M. WATTS, JR.
STEVEN J. WEINGARTEN
NEAL S. WEST
NORMAN I. WHITE
LAWRENCE R. WIEDER
GARY F. YENKOWSKI
WILLIAM M. YOUNG, JR.

SCOTT A. GOULD
P. NICHOLAS GUARNESCHELLI
ROBERT G. HAAS
BRIAN F. JACKSON
DONALD B. KAUFMAN
MICHAEL R. KELLEY
PETER F. KRIETE
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

ERIC N. ATHEY
DAVID M. BAKER
JONATHAN C. BERRY
BRETT D. DAVIS
JAMES P. D'ANGELO
JAMES P. DOUGHERTY
KATHLEEN A. DUNST
ROBERT J. GODUTO

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 Fourth 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. Klepp*
David M. Kleppinger

DOCUMENT
FOLDER

DMK/gm
Enclosures

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

RECEIVED
95 MAR 14 AM 8:14
PA. F. U. C.
INFO. CONTROL DIV.

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:

Johnnie E. Simms, Esq.
Kenneth L. Mickens, Esq.
Stephen E. Gorka, Esq.
Office of Trial Staff
PA Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

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

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

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

David A. McCormick, Esq.
Office of The Judge Advocate General
Department of the Army
DAJA-RL 3848
901 N. Stuart Street, Room 713
Arlington, VA 22203-2960

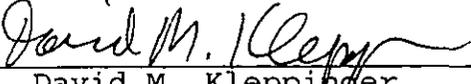
Thomas P. Gadsden, Esq.
Anthony C. DeCusatis, Esq.
David B. MacGregor, Esq.
Morgan, Lewis & Bockius
2000 One Logan Square
Philadelphia, PA 19103

DOCKETED
MAR 22 1995

DOCUMENT
FOLDER

Certificate of Service
Page 2

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



David M. Kleppinger

Dated this 13th day of March, 1995, in Harrisburg, Pa.



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

March 14, 1995

Eric J. Epstein
2308 Brandywine Drive
Harrisburg, PA 17110

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

Dear Mr. Epstein:

In your letter of March 8, 1995, you state that "due to an oversight" you did not receive notification of the prehearing conference held on March 7, 1995. You request that you be included on the party list and be apprised of future hearings. The purpose of this letter is to inform you that you have been added to the "Active Parties List" in this case, and to correct an apparent misunderstanding on your part.

Your failure to receive notice of the prehearing conference was not due to an oversight. As you note in your letter, you did not file your formal complaint until February 6, 1995. The Office of Administrative Law Judge (OALJ) Scheduling Staff served the notice of prehearing conference on January 20, 1995; I served my first prehearing order on January 27, 1995. Both documents were served on the parties who had filed complaints at the time that the documents were served. Because you had not yet filed your complaint, you did not get copies. Your failure to receive copies of these documents was due to the fact that you had not yet filed your complaint. Neither I nor the OALJ Scheduling Staff have the time or resources to monitor the complaints filed against a particular rate increase and to send to each new complainant copies of all of the documents that were issued before that person filed a complaint.

DOCKETED
MAR 27 1995

Very truly yours,
Michael C. Schnierle
MICHAEL C. SCHNIERLE
Administrative Law Judge

cc: Active Parties List
New Filing

DOCUMENT
FOLDER

RECEIVED
MAR 15 AM 10:09
IN REPLY PLEASE REFER TO OUR FILE
KJH
PA. P. & L. C. DIV.
INFO. CONTROL



Commonwealth of Pennsylvania

KJR

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

March 15, 1995

In Re: **R-00943271,**
R-00943271C0001-C0130

RECEIVED
95 APR 20 AM 10:15
PA. P.U.C.
INFO. CONTROL DIV.
RECEIVED

BARBARA MCCREA
1724 SOUTH HALL STREET APT C2
ALLENTOWN PA 18103

APR 17 1995

Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company

OFFICE OF C.A.L.J
PUBLIC UTILITY COMMISSION

Investigation into a proposed \$261,000,000 rate increase.

NOTICE

This is to inform you that an Initial Hearing on the above-captioned case will be held on Tuesday, March 21, 1995 at 10:00 a.m. in an available hearing room, Ground Floor, North Office Building, North Street and Commonwealth Avenue, Harrisburg, Pennsylvania.

Additionally, a further hearing schedule has been set as follows:

Thursday, March 23, 1995	at	10:00 a.m.
Friday, March 24, 1995	at	10:00 a.m.
Monday, March 27, 1995	at	10:00 a.m.
Tuesday, March 28, 1995	at	10:00 a.m.
Wednesday, March 29, 1995	at	10:00 a.m.
Tuesday, April 25, 1995	at	10:00 a.m.
Wednesday, April 26, 1995	at	10:00 a.m.
Thursday, April 27, 1995	at	10:00 a.m.
Friday, April 28, 1995	at	10:00 a.m.
Tuesday, May 2, 1995	at	10:00 a.m.
Wednesday, May 3, 1995	at	10:00 a.m.
Monday, May 22, 1995	at	10:00 a.m.
Tuesday, May 23, 1995	at	10:00 a.m.
Wednesday, May 24, 1995	at	10:00 a.m.
Thursday, May 25, 1995	at	10:00 a.m.
Friday, May 26, 1995	at	10:00 a.m.

All of the above-scheduled hearings will also be held in an available hearing room, Ground Floor, North Office Building, North Street and Commonwealth Avenue, Harrisburg, Pennsylvania.

A schedule of public input hearings will be provided by additional letter.

The presiding officer in this proceeding is Administrative Law Judge Robert A. Christianson. Judge Christianson can be contacted by mail at PO Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 783-5452. Chief Administrative Law Judge Allison K. Turner may preside at some of the proceedings. Judge Turner can be contacted by mail at the same address and by telephone at (717) 787-1191.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: (717) 787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5984



Commonwealth of Pennsylvania

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

March 15, 1995

In Re: **R-00943271,
R-00943271C0001-C0130**

(See letter dated 3/9/95)

DOCKETED
APR 3 1995

**Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company**

Investigation into a proposed \$261,000,000 rate increase.

NOTICE

This is to inform you that the presiding officer in the subject proceeding has been changed from Administrative Law Judge Michael C. Schnierle to Administrative Law Judge Robert A. Christianson. Judge Christianson can be contacted at PO Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 787-8813.

Chief Administrative Law Judge Allison K. Turner may preside at some of the proceedings. Judge Turner can be contacted by mail at the same address and by telephone at (717) 787-1191.

Please change your records accordingly.

- cc: Judge Christianson
- Judge Schnierle
- Chief Turner
- Kevin Cadden - Rm. 111
- John Frazier - BPL
- Office of Trial Staff (4)
- Law Bureau - Rm. G28
- Consumer Advocate (2)
- Small Business Advocate
- Gail Miller - Rm. 118
- Bill Barrett
- Norma Lewis
- Judy Weaver, Scheduling Officer
- Calendar File
- Beth Plantz
- Docket Section**

Certified Mail
Receipt Requested &
Reg. Mail to Complainant

**DOCUMENT
FOLDER**



Commonwealth of Pennsylvania

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

March 15, 1995

In Re: **R-00943271,
R-00943271C0001-C0130**

(See letter dated 3/9/95)

**Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company**

Investigation into a proposed \$261,000,000 rate increase.

NOTICE

This is to inform you that Public Input Hearings on the above-captioned case will take place as follows:

Thursday, March 30, 1995 at 1:30 p.m.
Pennsylvania State Museum
3rd and North Streets
Harrisburg, Pennsylvania 17108-1026

Thursday, March 30, 1995 at 7:00 p.m.
Pennsylvania State Museum
3rd and North Streets
Harrisburg, Pennsylvania 17108-1026

Friday, March 31, 1995 at 1:30 p.m.
Southern Market Center
100 South Queen Street
(Vine Street Entrance)
Lancaster, Pennsylvania 17603

Friday, March 31, 1995 at 7:00 p.m.
Southern Market Center
100 South Queen Street
(Vine Street Entrance)
Lancaster, Pennsylvania 17603

DOCKETED
APR 3 1995

**DOCUMENT
FOLDER**

Tuesday, April 4, 1995 at 1:30 p.m.
Municipal Building
340 N. Washington Street
Scranton, Pennsylvania 18503

Tuesday, April 4, 1995 at 7:00 p.m.
Coughlin High School
80 North Washington Street
(Auditorium)
Wilkes-Barre, Pennsylvania 18701

Wednesday, April 5, 1995 at 1:30 p.m.
City Hall
40 N. Church Street
Hazleton, Pennsylvania 18201

Wednesday, April 5, 1995 at 7:00 p.m.
Schuylkill County Court House
401 North Second Street
Pottsville, Pennsylvania 17901

Thursday, April 6, 1995 at 1:30 p.m.
City of Bethlehem
Town Hall
10 East Church Street
Bethlehem, Pennsylvania 18018

Thursday, April 6, 1995 at 7:00 p.m.
City of Allentown
435 Hamilton Street
Allentown, Pennsylvania 18101

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: (717) 787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5984

cc: Judge Christianson
Chief Turner
Kevin Cadden - Rm. 111
John Frazier - BPL
Office of Trial Staff (4)
Law Bureau - Rm. G28
Consumer Advocate
Small Business Advocate
Gail Miller - Rm. 118
Bill Barrett
Norma Lewis
Judy Weaver, Scheduling Officer
Calendar File
Beth Plantz
Docket Section

Certified Mail
Receipt Requested

Chairman Quain
Vice Chairman Rhodes
Commissioner Crutchfield
Commissioner Hanger
Commissioner Rolka



Commonwealth of Pennsylvania

KJR

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

March 16, 1995

95 MAR 17 11:15 AM

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

Re: R-00943271,
R-00943271C0001-C0130

DOCKETED
APR 3 1995

(See letter dated 03/15/95)

Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company

Investigation into a proposed \$261,000,000 rate increase.

NOTICE

This is to inform you that an additional Public Input Hearing on the above-captioned case will take place as follows:

Monday, April 3, 1995 at 7:00 p.m.
Old Lycoming Township Fire Company
1600 Dewey Avenue
Williamsport, Pennsylvania PA 17701

**DOCUMENT
FOLDER**

The presiding officer in this proceeding is Administrative Law Judge Robert A. Christianson. Judge Christianson can be contacted at PO Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 783-5452.

Please change your records accordingly.

cc: Judge Christianson
Kevin Cadden - Rm. 111
John Frazier - BPL
Office of Trial Staff (4)
Law Bureau - Rm. G28
Consumer Advocate
Small Business Advocate
Gail Miller - Rm. 118
Bill Barrett
Norma Lewis
Judy Weaver, Scheduling Officer
Calendar File
Beth Plantz
Docket Section

Certified Mail
Receipt Requested

Chairman Quain
Vice Chairman Rhodes
Commissioner Crutchfield
Commissioner Hanger
Commissioner Rolka



DEPARTMENT OF THE ARMY
OFFICE OF THE JUDGE ADVOCATE GENERAL
901 NORTH STUART STREET
ARLINGTON, VA 22203-1837



REPLY TO
ATTENTION OF

KJR

March 17, 1995

Regulatory Law Office
U 3848

SUBJECT: Pennsylvania Public Utility Commission vs. Pennsyl-
vania Power and Light Company, Pennsylvania P.U.C.
Docket No. R 94-3271

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

Dear Mr. Alford:

This letter is to record that the intervenor, consumer interest of the United States Department of Defense and other affected Executive Agencies in the above referenced proceeding has sent (by U.S. Mail) copies of Responses to the Interrogatories (PPL-1-1 thru PPL-1-6) upon all active parties on the Active Party service list, in accord with the Certificate of Service appended hereto.

Inquiries to this office regarding this proceeding should be directed to the undersigned at (703) 696-1646.

Sincerely,

David A. McCormick
General Attorney
Regulatory Law Office

DOCUMENT
FOLDER

RECEIVED
95 MAR 20 AM 9:43
PA, P. U. C.
INFO. CONTROL DIV.

3-20/95

CERTIFICATE OF SERVICE

I certify that I have caused a copy of the foregoing document to be sent this day, by postage prepaid, first class U.S. Mail to the following ACTIVE PARTIES addressees:

PAUL E. RUSSELL, ESQUIRE
LAW DEPARTMENT
PENNSYLVANIA POWER & LIGHT COMPANY
2 North Ninth Street
ALLENTOWN, PA 18101-1179

JOHNNIE E. SIMMS, ESQUIRE
KENNETH L. MICKENS, ESQUIRE
OFFICE OF TRIAL STAFF
PENNSYLVANIA PUBLIC UTILITY COMMISSION
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OFFICE OF THE SMALL BUSINESS ADVOCATE
SUITE 1102, COMMERCE BUILDING
300 N. SECOND STREET
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ANTHONY C. DeCUSATIS, ESQUIRE
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COMMISSION ON ECONOMIC
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SCHNADER, HARRISON, SEGAL,
AND LEWIS
1600 MARKET STREET, SUITE 3600
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ASSISTANT CONSUMER ADVOCATE
OFFICE OF THE CONSUMER ADVOCATE
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HARRISBURG, PA 17120

ALAN J. BARAK, ESQUIRE
MID ATLANTIC ENERGY PROJECT
WIDENER ENERGY LAW CLINIC
3700 VARTAN WAY
HARRISBURG, PA 17110-9450

MR. THOMAS S. CATLIN
EXETER ASSOCIATES, INC.
12510 PROSPERITY DRIVE, SUITE 350
SILVER SPRING, MD 20904

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FOLDER

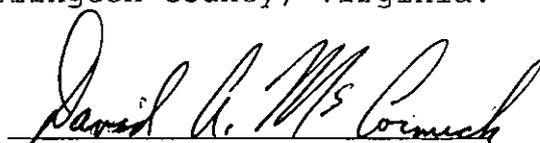
DOCKETED

MAR 31 1995

STEPHEN J. SELDEN, ESQUIRE
BETHLEHEM STEEL CORPORATION
BETHLEHEM, PA 18016

WAYNE M. THOMAS, ESQUIRE
1101 MARKET STREET, 24th FLOOR
PHILADELPHIA, PA 19107

Dated this 17th day of March 1995, at Arlington County, Virginia.





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

March 15, 1995

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

DOCUMENT
FOLDER

RECEIVED
95 MAR 20 AM 9:50
PA. P. U. C. DIV.
INFO. CONTROL

**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

**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 Trial Staff's
Interrogatories numbered OTS-RB-58 through OTS-RB-64, OTS-RS-43
through OTS-RS-47 and OTS-RS-48 through OTS-RS-49 upon the active
participants listed below, in accordance with the requirements of § 1.54
(relating to service by a participant):

HAND DELIVERED

DOCKETED
MAR 21 1995

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

Bernard A. Ryan, Jr., Esquire
Office of Small Business Advocate
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Schnader, Harrison, Segal & Lewis
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1600 Market Street
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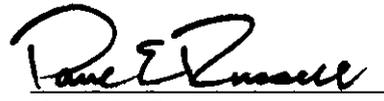
Alan J. Barak, Esquire
Mid-Atlantic Energy Project
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Harrisburg, Pennsylvania 17110

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Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596


Paul E. Russell

Dated: March 15, 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 20, 1995

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

DOCUMENT
FILED

RECEIVED
95 MAR 23 AM 8:55
P.A. P. U. C. DIV.
INFO. CONTROL

**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 supplemented 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 Robert A. Christianson

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

HAND DELIVERED

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MAR 27 1995

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211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950


Paul E. Russell

Dated: March 21, 1995
at Allentown, Pennsylvania

MORGAN, LEWIS & BOCKIUS

COUNSELORS AT LAW

2000 ONE LOGAN SQUARE

PHILADELPHIA, PENNSYLVANIA 19103-6993

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PHILADELPHIA

NEW YORK

MIAMI

PRINCETON

BRUSSELS

March 20, 1995

DAVID B. MACGREGOR

DIAL DIRECT (215) 963-5448

RECEIVED
MAR 20 1995

SECRETARY'S OFFICE
Public Utility Commission

John G. Alford, Secretary
Pennsylvania Public Utility Commission
Room B-18, North Office Building
Commonwealth & 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 Objections to Sierra Club Data Requests, Set I and Set II.

As indicated on the attached Certificate of Service, copies of the enclosed have been served on all active parties of record.

Sincerely,

David B. MacGregor
Counsel for Pennsylvania
Power & Light Company

DOCUMENT
FOLDER

DBM\jta
Enclosures
cc: Certificate of Service

3-20
120

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
MAR 20 1995

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PENNSYLVANIA POWER & LIGHT
COMPANY

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Docket No. R-00943271

SECRETARY'S OFFICE
Public Utility Commission

OBJECTIONS OF PENNSYLVANIA POWER & LIGHT COMPANY
TO SIERRA CLUB'S DATA REQUESTS
SET I AND SET II

Pennsylvania Power & Light Company ("PP&L"), by its attorneys, files herewith the following Objections to Sierra Club Data Requests Set I and Set II:

I. GENERAL OBJECTION

Sierra Club Data Requests Set I and Set II, consisting of 97 data requests, many with multiple sub-parts, were received by PP&L via fax after the close of business on Friday, March 10, 1995. These data requests are extremely broad ranging and will require an extensive commitment of time and resources to answer.

PP&L, upon request, mailed a complete copy of its rate filing to Sierra Club on January 6, 1995, seven days after the case was filed. Yet, Sierra Club failed to serve any discovery on the Company until March 10, 1995, over 60 days after the Company filed its case. Moreover, none of the discovery requests which were ultimately submitted contain any specific reference to PP&L's rate filing. They are a "generic" set of data requests that could have been served upon the Company at any time.

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MAR 29 1995

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As a result of the Sierra Club's unreasonable and unjustified delay in initiating discovery, PP&L is now faced with answering Sierra Club's 97 data requests, many with multiple sub-parts, at the same time it will be preparing for and attending hearings in this case. The same Company personnel and counsel who must respond to and review these data requests also will be simultaneously preparing for and attending hearings in this proceeding.

As a result if these circumstances, PP&L is not able to prepare responses to Sierra Club's data requests within 15 days and objects to doing so. PP&L will respond to these data requests as soon as practicable given the hearing schedule in this case.

II. SPECIFIC OBJECTIONS

In addition to the general objection above, PP&L files the following specific objections to the Sierra Club Data Requests:

1. Sierra Club Data Request Set I, No. 6 states as follows:

First identify, and then provide, the following operating and financial reports for the Company, its subsidiaries, affiliates, and/or corporate owner, for the period indicated:

- a. monthly management reports (this calendar year though the pendency of this case);
- b. year-end management report detail (last complete calendar years) (the "fat" December management report);
- c. monthly construction reports (present year);
- d. current adopted operating budget (last two calendar years, which includes present year);

- e. current adopted construction budget (last two calendar years, which includes present year);
- f. current adopted construction budget supporting detail (last two calendar years, which includes present year);
- g. current proposed operating budget (for budget covering upcoming calendar year);
- h. current proposed construction budget (for budget covering upcoming calendar year);
- i. current proposed construction budget supporting detail (for budget covering upcoming calendar year);
- j. current responsibility budgets (for budget covering this calendar year);
- k. proposed responsibility budgets (for budget covering upcoming calendar year);
- l. current planning year estimate (i.e. post-budget year);
- m. proposed planning year estimate (i.e. post-budget year);
- n. reports of property held or acquired for future use (last two calendar years, which includes present year);
- o. report on sources and uses of funds for last full calendar year;
- p. most recent report on sources and uses of funds;
- q. reports of generation dispatched as fixed loaded units, for the purpose of fuel inventory control, system security, or other non-economic reason, or the reports' equivalent (for each of the last two complete calendar years plus this calendar year to date);
- r. monthly reports of sales to the Company's largest industrial customers (for last calendar year plus this calendar year); and/or
- s. normal maintenance percents reports or equivalent (for last calendar year and this calendar year).

The Company objects to this data request on the grounds that it is overly broad, unreasonably burdensome, and would require an unreasonable investigation.

2. Sierra Club Data Request Set I, No. 15 states, as follows:

First identify, and then provide, the documents presenting detailed, current explanation of Company transactions with associated and/or affiliated companies, describing the services performed and/or the bases for the related charges for the periods: documents generated since the filing of the Company's last general base rate case.

PP&L objects to this question on the grounds that it is overly broad, unreasonably burdensome and would require an unreasonable investigation. Specifically, PP&L objects to providing the detailed information requested for the ten-year period dating back to PP&L's last base rate case. This information is irrelevant and would be unreasonably burdensome to produce.

3. Sierra Club Data Request Set I, No. 18 states, as follows:

Please provide the billing inserts sent to customers since the filing of the Company's preceding rate case which discussed DSM or energy efficiency.

PP&L objects to this data request on the same grounds as stated in its objection to Sierra Club Data Request No. 15.

4. Sierra Club Data Request Set I, No. 33 states, as follows:

First, identify, and then provide, each document embodying correspondence, and/or recording a communication other than a contract and/or contract draft, complete with all attachments, which the Company has had with another utility(s) regarding the transmission of electricity into and/or out of the Company's system, and/or interconnection therefor: for each of the last three calendar years, including the present year.

PP&L objects to this data request on the grounds that it is overly broad, unreasonable burdensome and would require an unreasonable investigation.

5. Sierra Club Data Request Set I, No. 34 states, as follows:

First identify, and then provide, each document embodying correspondence, and/or recording a communication other than a contract and/or contract draft, complete with all attachments, which the Company has had with another NONutility(s) regarding the transmission of electricity into and/or out of the Company's system, and/or the interconnection therefore: for each of the last three calendar years, including the present year.

PP&L objects to this data request for the reasons set forth in its objection to Data Request No. 33.

6. Sierra Club Data Request Set I, No. 45, states as follows:

First identify, and then provide, the load flow analysis reports, cover letters and/or other transmittals, and attachments, generated for the Company's system since the date two years before the Company filed this case.

PP&L objects to this data request for the reasons set forth in its objection to Data Request No. 33.

7. Sierra Club Data Request Set I, No. 46, states as follows:

First identify, and then provide, each report, study, memorandum or other writing which addresses the acquisition of new sources of energy for any period following the conclusion of the Company's last base rate case.

PP&L objects to this data request for the same reasons stated in its objection to Data Request No. 15.

8. Sierra Club Data Request Set I, No. 51, states as follows:

First identify, and then provide, each communication since the filing of the Company's preceding base rate case, or record or summary of such communication, to and/or from each large industrial or commercial customer regarding the development of:

- a. an alternative tariff;
- b. a discount, or other reduction in bills or rates;
- c. the provision of services to assist in lowering bills; and/or
- d. transmission of power generated by another entity.

PP&L objects to this data request for the same reasons stated in its objection to Sierra Club Data Request No. 15.

9. Sierra Club Data Request Set II, No. 3, states as follows:

Please specify pollution-control-related capital expenditures at each generating unit:

- a. total per unit; and separately for
- b. No_x requirements;
- c. So_2 requirements;
- d. toxics/particulates; and
- e. other compliance requirements.

PP&L objects to this data request on the grounds that it is overly broad, unreasonably burdensome and would require an unreasonable investigation.

10. Sierra Club Data Request Set II, No. 4, states as follows:

For each generating unit, please provide BOTH the dollar value and unit cost in mills/kWh:

- a. required return on investment;
- b. required return of investment;

- c. allocated administrative and general expenses;
- d. other fixed O&M;
- e. fuel;
- f. other variable O&M;
- g. taxes:
 - i. federal taxes;
 - ii. state taxes;
 - iii. local taxes;
 - iv. taxes due to generation at the unit;
 - v. property taxes;
 - vi. other taxes;
- h. depreciation expense;
- i. total operating cost.

PP&L objects to this data request on the grounds that it is overly broad, unreasonably burdensome and would require an unreasonable investigation.

11. Sierra Club Data Request Set II, No. 6, states as follows:

First identify, and then provide, those documents which show each of the following:

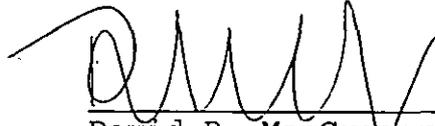
- a. Planned operation levels of all facilities affected under either Phase I or II or Title IV of the Clean Air Act;
- b. The expected emission reductions required under both phases of Title IV of the Clean Air Act;
- c. An assessment of the least-cost means of achieving this reduction, including consideration of:
 - i. Fuel-switching (e.g., oil to gas, high-sulphur to low sulphur coal, and coal to gas);
 - ii. Retrofit of pollution control devices;
 - iii. Energy-efficiency improvements; and
 - iv. Purchase or sale of emission allowances.
- d. With respect to all existing utility-owned, supply-side resources, identification and description of such resources including:
 - i. Name and location;

- ii. Rated Capacity and net dependable capacity;
- iii. Equivalent availability factors and capacity factors;
- iv. Applicable heat rates;
- v. Specification and description of fuel types, including, with respect to resources using coal, description of the quality of the coal(s) used;
- vi. Expected remaining fuel life;
- vii. The range of projected fuel prices, including at least high, base, and low estimates, and justification thereof;
- viii. Fixed and variable costs of producing energy; and
- ix. Emission rates (expressed in pounds emitted per kWh generated) of the following pollutants:
 - 1. oxides of sulphur;
 - 2. oxides of nitrogen and nitrous oxides;
 - 3. carbon dioxide;
 - 4. carbon monoxide;
 - 5. volatile organic hydrocarbons;
 - 6. particulates;
 - 7. methane;
 - 8. Chlorofluorocarbons and other ozone-depleting substances; and
 - 9. air toxics, as defined in Title III of the Clean Air Act.
- x. A description of the impacts on land (including solid-waste disposal) and water resources.

PP&L objects to this data request on the grounds that it is overly broad, unreasonably burdensome and would require an unreasonable investigation.

WHEREFORE, for the reasons set forth above, the Company's objections to Sierra Club's Data Requests Sets I and II should be granted and the Company should not be required to respond as noted herein.

Respectfully submitted,



David B. MacGregor
MORGAN, LEWIS & BOCKIUS
2000 One Logan Square
Philadelphia, PA 19103

Paul E. Russell
Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, PA 18101

Counsel for Pennsylvania Power &
Light Company

OF COUNSEL:

MORGAN, LEWIS & BOCKIUS
2000 One Logan Square
Philadelphia, PA 19103
(215) 963-5448

Date: March 20, 1995

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, ET AL. :
 :
v. : DOCKET NO. R-00943271
 :
PENNSYLVANIA POWER & LIGHT :
COMPANY :

CERTIFICATE OF SERVICE

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

BY FIRST CLASS MAIL

Tanya J. McCloskey, Esq.
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

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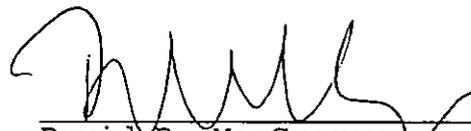
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Dated: March 20, 1995



David B. MacGregor
Counsel for Pennsylvania Power
& Light Company



Pennsylvania Power & Light Company

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

FAX: 610/774-6726

^{KJR}
ORIGINAL

March 20, 1995

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

Re: **Pennsylvania Public Utility Commission**
v.
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Docket No. R-00943271

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

Very truly yours,

Paul E. Russell

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Attachment

cc: The Honorable Robert A. Christianson

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5

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-RS-43 through OTS-RS-49 and OTS-RB-58 through OTS-RB-64 upon the active participant listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

OVERNIGHT MAIL

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950

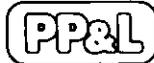
DOCKETED

MAR 30 1995


Paul E. Russell

Dated: March 20, 1995
at Allentown, Pennsylvania

**DOCUMENT
FOLDER :**



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 21, 1995

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

RECEIVED
95 MAR 23 AM 8:55
P.A. P.U.C. DIV.
INFO. CONTROL

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

DOCUMENT
NUMBER

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, supplemented answers and revised 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 Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT
FOLDER

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 answer to the Office of Consumer Advocate's Interrogatories, Set V numbered 48, revised answer to the Office of Consumer Advocate's Interrogatories, Set IV numbered 26 and supplemented answers to the Office of Consumer Advocate's Interrogatories, Set I numbered 34 and 35, Set III, number 12, Set IV numbered 6, 7, 9, 58 and 59, Set V number 43, and Set VII number 4 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 27 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

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950


Paul E. Russell

Dated: March 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

March 21, 1995

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

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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 Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Docket No. R-00943271

DOCUMENT
FILED

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-98 through OTS-RE-107, OTS-RS-50
through OTS-RS-55 and OTS-RB-65 through OTS-RB-71 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 27 1995

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

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

OVERNIGHT MAIL

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Sarah E. Tomalty, Esquire
Drennan & Associates
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Department of the Army
Office of the Judge Advocate General
901 North Stuart Street
Arlington, Virginia 22203-1837

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Industrial Economics Incorporated
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Exeter Associates, Inc.
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Silver Spring, Maryland 20904

Stephen J. Baron, President
J. Kennedy and Associates, Inc.
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Atlanta, Georgia 30328

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

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
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Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
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Mr. Craig R. Kuennen
Energy Services Manager
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Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950


Paul E. Russell

Dated: March 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

March 21, 1995

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

DOCUMENT
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95 MAR 23 AM 8:55
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 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 Robert A. Christianson

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-36D and OTS-RE-71D 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

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MAR 27 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

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Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, Massachusetts 02140

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Exeter Associates, Inc.
12510 Prosperity Drive
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Silver Spring, Maryland 20904

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J. Kennedy and Associates, Inc.
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35 Glenlake Parkway
Atlanta, Georgia 30328

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

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950


Paul E. Russell

Dated: March 21, 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

March 21, 1995

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

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95 MAR 23 AM 8:55
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 supplemented 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 Robert A. Christianson

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 supplemented answer to the Office of Small Business Advocate's Interrogatory, Set V number 29 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
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DOCKETED
MAR 27 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

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Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, Massachusetts 02140

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

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

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

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950


Paul E. Russell

Dated: March 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

DOCUMENT
FOLDER

March 21, 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

**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 Robert A. Christianson

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 Central Eastern
Pennsylvania Fuel Oil Dealers' Interrogatories numbered 1 through 47 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 27 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

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Sarah E. Tomalty, Esquire
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Atlanta, Georgia 30328

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Drazen-Brubaker & Assoc.
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Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950


Paul E. Russell

Dated: March 21, 1995
at Allentown, Pennsylvania

KIRKPATRICK & LOCKHART

THE PAYNE SHOEMAKER BUILDING
240 NORTH THIRD STREET
HARRISBURG, PENNSYLVANIA 17101-1507
TELEPHONE (717) 231-4500

ORIGINAL ^{KJK}

BOSTON, MA
MIAMI, FL
NEW YORK, NY
PITTSBURGH, PA
WASHINGTON, D.C.

March 21, 1995

WRITER'S DIRECT DIAL NUMBER

(717) 231-4500

John G. Alford, Secretary
Pennsylvania Public Utility Commission
Room G-23; North Office Building
P.O. Box 3265
Harrisburg, PA 17105-3265

RECEIVED
95 MAR 22 AM 10:51
PA. P. U. C. DIV.
INFO. CONTROL

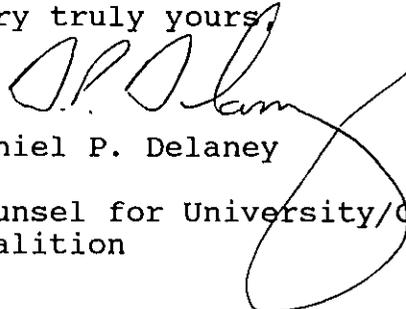
In Re: **Pennsylvania Public Utility Commission v.
Pennsylvania Power & Light Company.
Docket No. ~~P~~-00943271.**

R-

Dear Secretary Alford:

Enclosed for filing, please find a Certificate evidencing service of Set I Interrogatories to the Pennsylvania Power & Light Company filed on behalf of the University/College Coalition. Copies of these materials are being served upon the parties of record as indicated on the Certificate.

Very truly yours,



Daniel P. Delaney

Counsel for University/College
Coalition

Enclosures

cc: Parties of Record

DOCUMENT
FOLDER

3-22
2

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, et al.

v.

PENNSYLVANIA POWER & LIGHT
COMPANY

:
:
:
: Docket No. R-00943271
:
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of UCC's Set I Interrogatories addressed to PP&L, upon the parties identified below in accordance with the requirements of Section 1.54 (relating to service by a participant).

SERVICE BY FIRST-CLASS MAIL ON THE FOLLOWING:

Irwin A. Popowsky, Esq.
Mary C. Kenney, Esq.
Office of the Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17101

David M. Kleppinger, Esq.
McNees, Wallace & Nurick
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David A. McCormick, Esq.
Department of the Army
Office of the Judge Advocate
General
901 North Stuart Street
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Cambridge, Massachusetts 02140

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Sarah E. Tomalty, Esq.
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1216 16th Street, N.W.
Washington, PA 20036

DOCUMENT
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MAR 31 1995

Thomas S. Catlin
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Mid-Atlantic Energy Project
Widener University Energy Law
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Harrisburg, PA 17110

Eugene M. Brady
Executive Director
Commission on Economic
Opportunity
211 South Main Street
Wilkes-Barre, PA 18701-1596

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Kohn, Nast & Graf, P.C.
1101 Market Street; 24th Floor
Philadelphia, PA 19107

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

Stephen J. Baron, President
J. Kennedy and Associates, Inc.
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Atlanta, Georgia 30328

David L. Pennington
Catherine Panchou Cox
Harvey, Pennington, Herting &
Renneisen, Ltd.
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Mr. Maurice Brubaker
Drazen-Brubaker & Associates,
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7730 Forsyth Boulevard
Suite 200
St. Louis, MO 63105-0840

Robert P. Haynes, III, Esq.
3401 North Front Street
P.O. Box 5950
Harrisburg, PA 17110-0950

VIA OVERNIGHT DELIVERY AS FOLLOWS:

Paul E. Russell, Esq.
Pennsylvania Power & Light
2 North 9th Street
Allentown, PA 19101-1179

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

KIRKPATRICK & LOCKHART
240 North Third Street
Harrisburg, PA 17101
(717) 231-4500
(717) 231-4501 (Facsimile)



Daniel P. Delaney, Esq.
Counsel For University/College
Coalition

DATED: March 21, 1995

APPEARANCE SHEET

ALJ HEARING REPORT

KJR

Docket No. R-00943271;
R-00943271C0001-C0028
 Case Name PA PUC v. PP & L
 Location Harrisburg
 Date March 21, 1994 1995
 ALJ Christianson/Turner
 Reporting Firm Commonwealth

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held **RECEIVED** YES NO

Hearing held 35 MAR 24 AM 10:27 YES NO

Testimony taken PA. P. U. C. YES NO

Transcript due INFO. CONTROL DIV. YES NO

Hearing concluded YES NO

Further hearing needed YES NO

Estimated add'l days FBI 3-24 not needed, otherwise as scheduled

RECORD CLOSED YES NO

DATE NOT YET

RECEIVED
 MAR 23 1995

OFFICE OF ALJ/PA PUC
 ELIZABETH L. PLANTZ

Briefs to be Filed YES NO

DATE _____

BENCH DECISION - I WISH YES NO

REMARKS:

DOCKETED
 APR 04 1995

DOCUMENT FOLDED

NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD
 PLEASE PRINT CLEARLY
 INCOMPLETE INFORMATION MAY RESULT IN DELAY OF PROCESS

NAME and TELEPHONE NUMBER	ADDRESS	APPEARING FOR
Johnnie E. Simms Kenneth L. Mickens Stephen Gorka Telephone No. 717-787-1976	P.O. Box 3265 City Hbg State PA Zip 17105	Office of TRIAL STAFF
David M. Kleppinger M. L. Nees, Wallace & Nurick Telephone No. 617-237-5214	P.O. Box 1166 City Hbg State PA Zip 17108	PP&L Industrial Customer Alliance (PP&L ICA)
David B. Mac Gregor Thomas P. Gadsden Anthony C. DeCusatis Telephone No. 215-963-5234	Morsm, Lewis & Backus 2000 One Logan Sq. City Phila State PA Zip 19103	Pennsylvania Power & Light Company

CHECK THIS BOX IF ADDITIONAL PARTIES OR COUNSEL OF RECORD APPEAR ON BACK.

John A. Kelly, CRC
William S. Harst, CRC
 REPORTER

NAME and TELEPHONE NUMBER	ADDRESS			APPEARING FOR
David A. McCormick Telephone No. (703) 696-1646	US Department of Army (DAJA-RL) 901 N. Stuart Street, Rm 713 City: Arlington State: VA Zip: 22203-1837			consumer interest of US Department of Defense and other affected Federal Executive Agencies
Karen Oill Moury Telephone No. (717) 783-2525	Suite 1102, Commerce Bldg 300 N. 2nd St. City: Harrisburg State: PA Zip: 17101			Office of Small Business Advocate
ERIC EPSTEIN Telephone No. 717-541-1101	2308 Bradywine Dr. City: Hbg State: PA Zip: 17110			Pro se
TANYA J. McCLOSKEY MARY C. KENNEY GICINE P. BRIGNOLA Telephone No. 717-783-5048	1425 Strawberry Sq. City: Hbg State: PA Zip: 17120			office of Consumer Advocate
PAUL E. RUSSELL Telephone No.	2 NORTH 9TH ST City: ALLENTOWN State: PA Zip: 18101			PENNSYLVANIA POWER & LIGHT CO.
Telephone No.	City: State: Zip:			
Telephone No.	City: State: Zip:			
Telephone No.	City: State: Zip:			
Telephone No.	City: State: Zip:			
Telephone No.	City: State: Zip:			
Telephone No.	City: State: Zip:			

To: AJS

TOP P PPA/L

KJR

Robert A. Lindemann
Vice President
Procurement and Transportation
317-879-4444

PENNSYLVANIA
PUBLIC UTILITY COMMISSION



MAR 30 1995

BUREAU OF CONSUMER SERVICES
DIVISION OF FIELD SERVICES

March 23, 1995

R-00943271

RECEIVED
95 APR - 5 PM 12:21
PA. P. U. C. DIV.
INFO. CONTROL

Pennsylvania Public Utilities Commission
North Office Building
P.O. Box 3265
Harrisburg, PA 17105

DOCKETED
APR 06 1995

Gentlemen:

In mid-February, 1995, Inland Container Corporation's Hazleton, Pennsylvania, facility received notification from Pennsylvania Power & Light Company that in December, 1994, it had filed a base rate increase request with the Pennsylvania Public Utilities Commission. The letter further indicated the filing for this increase projected to be in excess of \$50,000 to Inland, had been suspended by the Commission pending further hearings.

Inland Container Corporation would like to express its strong opposition to the magnitude of the proposed increase. Large single rate increases place too great a burden on industry. When these rate increases occur, industry is going to react by instituting cost cutting efforts which ultimately have a negative effect on the strength of the state's economy.

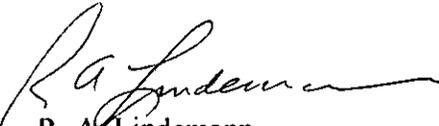
If, in your opinion, an increase is justified, we urge you to consider a lesser amount or an implementation period over a number of years. The commission's suspension of the rate filing application shows your concern regarding the welfare of the State of Pennsylvania's industrial base and the effect such economic hardship can impose upon its residents.

DOCUMENT
FOLDER

Pennsylvania Public Utilities Commission
March 23, 1995
Page 2

I would appreciate receiving a response from the Commission regarding the status of this rate increase and if any hearing dates have been set. Thank you for your attention and consideration in this matter.

Sincerely yours,



R. A. Lindemann

RAL/fw

cc: T. Shields - #32

APPEARANCE SHEET

ALJ HEARING REPORT

KJR

Docket No. R-00943271;

R-00943271C0001-C0028

Case Name PA PUC v. PP & L

Location Harrisburg

Date March 23, 1995

ALJ Christianson/Turner

Reporting Firm Commonwealth

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES NO

Hearing held AM 11:49 YES NO

Testimony taken YES NO

Transcript due YES NO

Hearing concluded YES NO

Further hearing needed YES NO

Estimated add'l days As scheduled

RECORD CLOSED YES NO

Briefs to be filed DATE later

BENCH DECISION YES NO

REMARKS: Mr. McCormick will not attend hearings next week

DOCKETED
APR 6 1995

Turner presiding

NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD
PLEASE PRINT CLEARLY
INCOMPLETE INFORMATION MAY RESULT IN DELAY OF PROCESS

NAME and TELEPHONE NUMBER	ADDRESS	APPEARING FOR
TANYA J. McCLOSKEY MARY C. KENNEY GICINE P. BRIGNOLA Telephone No. 717-783-5048	1425 Strawberry St City Hbg State PA Zip 17120	Office of Consumer Advocate
Johnnie E. Simms Kenneth L. Mickens Stephen Gorka Telephone No. 717-787-1976	P.O. Box 3265 City Hbg State PA Zip 17105	Office of TRIAL Staff
David A. McCormick Telephone No. (703) 696-1646	US Department of the Army (DASA-RL) 901 N. Stuart Street, Rm. 901 City Falls Church State VA Zip 22041-1837	For consumer interest of US Department of Defense and other Federal Executive Agencies

CHECK THIS BOX IF ADDITIONAL PARTIES

OR COUNSEL OF RECORD APPEAR ON BACK.

John A. Kelly, C.R.C., Inc.
REPORTER

NAME and TELEPHONE NUMBER	ADDRESS	APPEARING FOR
David M. Klepplyger M. Mees, Wallace & Nurick Telephone No. (217) 237-5214	P.O. Box 1166 City: Hbg State: PA Zip: 17108	PP & L Industrial Customer Alliance
Joan Brandeis Schnader, Harrison Segal & Lewis Telephone No. (215) 751-2278	1600 Market St. Suite 3600 City: Phila. State: PA. Zip: 19103	Bethlehem Steel Corporation
Karen Oill Moury Telephone No. 717-783-2525	Suite 1102, Comm. Bldg 300 N. 2nd St City: Phila. State: Pa Zip: 17101	OSBA
Thomas P. Goodson David B. MacGregor Morgan, Lewis & Bockius Telephone No. 215-963-5448	2000 One Logan Square City: Phila State: PA Zip: 19103	PP & L
PAUL E. PUSSELL Telephone No.	2 NORTH 9TH ST City: ALLENTOWN State: PA Zip: 18101	PP & L
ERIC J. EPSTEIN Telephone No.	2328 Brydwin Dr City: Hbg State: PA Zip: 17110	Pro SE
ALAN J. BARAK 717-541-1967 Telephone No.	3700 VARTAN WAY City: HEBURG State: PA Zip: 17110	Sierra Club
Telephone No.	City State Zip	
Telephone No.	City State Zip	
Telephone No.	City State Zip	
Telephone No.	City State Zip	



Commonwealth of Pennsylvania

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

March 27, 1995

In Re: R-00943271,
R-00943271C0001-C0130

KJR

(See letter dated 03/16/95)

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95 MAR 28 AM 9:56
INFO. CONTROL DIV.
PA. P. U. C. DIV.

DOCKETED
APR 7 1995

Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company

Investigation into a proposed \$261,000,000 rate increase.

NOTICE

This is to inform you that the additional Public Input Hearing now scheduled to be held on Monday, April 3, 1995 at 7:00 p.m. at Old Lycoming Township Fire Company, 1600 Dewey Avenue, Williamsport Pennsylvania 17701 in the subject proceeding has been changed as follows:

Monday, April 3, 1995 at 7:00 p.m.

First Ward Fire Company
573 Hasting Street
South Williamsport, Pennsylvania 17701

The presiding officer in this proceeding is Administrative Law Judge Robert A. Christianson. Judge Christianson can be contacted at PO Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 783-5452.

Please change your records accordingly.

cc: Judge Christianson
Kevin Cadden - Rm. 111
John Frazier - BPL
Office of Trial Staff (4)
Law Bureau - Rm. G28
Consumer Advocate
Small Business Advocate
Bill Barrett
Norma Lewis
Judy Weaver, Scheduling Officer
Calendar File
Beth Plantz
Docket Section

Certified Mail
Receipt Requested

Chairman Quain
Vice Chairman Rhodes
Commissioner Crutchfield
Commissioner Hanger
Commissioner Rolka



Pennsylvania Power & Light Company

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

CONFIDENTIAL

KJR

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

FAX: 610/774-6726

March 24, 1995

RECEIVED
95 MAR 27 AM 9:22
PA. P. U. C. DIV.
INFO. CONTROL

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 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 Robert A. Christianson

DOCUMENT
FOLDER

96

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 answer to the Office of Small Business Advocate's Interrogatories, Set I numbered 30 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
FOLDER¹⁻

DOCKETED
APR 05 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

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950

Mr. Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110


Paul E. Russell

Dated: March 24, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

ORIGINAL

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95 MAR 27 AM 9:22
PA. P. U. C.
INFO. CONTROL DIV.

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

FAX: 610/774-6726

March 24, 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

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 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 Robert A. Christianson

3/27
114

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 answer to the Office of
Consumer Advocate's Interrogatories, Set IV numbered 92 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

- 1 -

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APR 05 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

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

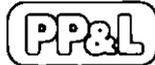
Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950

Mr. Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110


Paul E. Russell

Dated: March 24, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

ORIGINAL

KJR

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

FAX: 610/774-6726

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March 24, 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**

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 Robert A. Christianson

DOCUMENT
FOLDER

3/27
115

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 IV numbered 1 through 3 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

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APR 05 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.
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Department of the Army
Office of the Judge Advocate General
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Arlington, Virginia 22203-1837

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J. Kennedy and Associates, Inc.
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35 Glenlake Parkway
Atlanta, Georgia 30328

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

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Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

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Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950

Mr. Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110


Paul E. Russell

Dated: March 24, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

ORIGINAL

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

FAX: 610/774-6726

March 24, 1995

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F.A. 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

Attachment

cc: The Honorable Robert A. Christianson

**DOCUMENT
FOLDER**

3/27
120

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-108 through OTS-RE-115 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

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APR 05 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

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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

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1600 Market Street
Philadelphia, Pennsylvania 19103-4252

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3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

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Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950

Mr. Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110


Paul E. Russell

Dated: March 24, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

ORIGINAL

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

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95 MAR 27 AM 9:22
INFO. CONTROL DIV.

March 24, 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

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 Robert A. Christianson

DOCUMENT
FOLDER

3/27
117

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 IX numbered 1 through 32 and Set X 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
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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APR 05 1995

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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

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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

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Exeter Associates, Inc.
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Suite 350
Silver Spring, Maryland 20904

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J. Kennedy and Associates, Inc.
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Atlanta, Georgia 30328

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Schnader, Harrison, Segal & Lewis
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Philadelphia, Pennsylvania 19103-4252

Alan J. Barak, Esquire
Mid-Atlantic Energy Project
3700 Vartan Way
Harrisburg, Pennsylvania 17110

Mr. Maurice Brubaker
Drazen-Brubaker & Assoc.
P. O. Box 16140
St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
Pyros Financial Group
One South Main Street
Wilkes-Barre, Pennsylvania 17801

James Melia, Esquire
Kirkpatrick & Lockhart
The Payne Shoemaker Building
240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950

Mr. Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110


Paul E. Russell

Dated: March 24, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

ORIGINAL

KJP

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

FAX: 610/774-6726

RECEIVED
95 MAR 27 AM 9:22
PA. P. U. C. DIV.
INFO. CONTROL

March 24, 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

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 Robert A. Christianson

3/27
116

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 Bethlehem Steel's Interrogatories, Set I numbered 1 through 13 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

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APR 05 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

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Sarah E. Tomalty, Esquire
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Office of the Judge Advocate General
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Arlington, Virginia 22203-1837

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Industrial Economics Incorporated
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Cambridge, Massachusetts 02140

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St. Louis, Missouri 63105-0840

Mr. Jeffrey J. Pyros
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240 North Third Street
Harrisburg, Pennsylvania 17101-1507

Mr. Craig R. Kuennen
Energy Services Manager
Commission on Economic Opportunity
211 South Main Street
Wilkes-Barre, Pennsylvania 18701-1596

Robert P. Haynes, Esquire
Mette, Evans & Woodside
3401 North Front Street
Harrisburg, Pennsylvania 17110-0950

Mr. Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110


Paul E. Russell

Dated: March 24, 1995
at Allentown, Pennsylvania



Pennsylvania Power & Light Company

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

ORIGINAL

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

KJR

FAX: 610/774-6726

March 24, 1995

HAND DELIVERED

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

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95 MAR 27 AM 9:22
PA. P. U. C. DIV.
INFO. CONTROL

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

Dear Mr. Alford:

Enclosed for filing on behalf of Pennsylvania Power & Light Company (PP&L) are eight (8) copies of Exhibit MJB 7a in this proceeding. This exhibit provides a comparison of actual to budget for the three months ended December 31, 1994.

As indicated on the attached Certificate of Service, I have served copies of this filing on all active parties in this proceeding.

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

Very truly yours,

**DOCUMENT
FOLDER**

Paul E. Russell

Attachment

cc: The Honorable Robert A. Christianson

3/27
121

PENNSYLVANIA POWER & LIGHT COMPANY
 Electric Operations - Comparison of Actual to Budget
 for the Three Months Ended December 31, 1994
 (Thousands of Dollars)

RECORDED
 MAR 27 1995

SECRETARY'S OFFICE
 Public Utility Commission
 Variance

	Three Months Ended 12/31/94		Variance	
	Actual	Budget	Amount	%
Operating Revenues				
PUC Customers				
Base Rates	\$473,110	\$495,217	(\$22,107)	(4.5)
Energy Cost Rate	69,798	75,558	(5,760)	(7.6)
SBRCA	(11,053)	(11,455)	402	3.5
STAS	(713)	0	(713)	(100.0)
Total PUC Customers	531,142	559,320	(28,178)	(5.0)
FERC Customers				
Base Rates	94,888	92,724	2,164	2.3
Fuel Adjustment	(627)	(416)	(211)	(50.7)
Total FERC Customers	94,261	92,308	1,953	2.1
PJM Power Sales	12,322	27,789	(15,467)	(55.7)
Other Electric	16,327	15,313	1,014	6.6
Total Operating Revenues	654,052	694,730	(40,678)	(5.9)
Operating Expenses				
Fuel	93,586	129,180	(35,594)	(27.6)
Power Purchases	65,400	63,222	2,178	3.4
Wages & Employee Benefits	81,491	93,582	(12,091)	(12.9)
Other Operating Expenses	90,532	80,532	10,000	12.4
Voluntary Early Retirement Program (VERP)	75,859	0	75,859	100.0
Total O & M Expenses	406,868	366,516	40,352	11.0
Depreciation	72,349	71,848	501	0.7
Deferred Depreciation	6,565	6,557	8	0.1
Regulatory Debits (Credits), net	(3,539)	(5,443)	1,904	35.0
Income Tax Provision - Federal	49,611	54,362	(4,751)	(8.7)
- State	18,848	21,628	(2,780)	(12.9)
Deferred Income Taxes	(32,908)	(7,726)	(25,182)	(325.9)
ITC - Deferred	0	0		
- Amortization	(3,029)	(3,027)	(2)	(0.1)
Taxes Other Than Income	47,870	50,923	(3,053)	(6.0)
Gain from Disposition of Emission Allowances	0	(486)	486	100.0
Total Operating Expenses	562,635	555,152	7,483	1.3
Operating Income	<u>\$91,417</u>	<u>\$139,578</u>	<u>(\$48,161)</u>	<u>(34.5)</u>

DOCUMENT
 FOLDER

JACKETED
 APR 05 1995

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 Exhibit MJB 7a 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
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Office of Trial Staff
Pennsylvania Public Utility Commission
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Drazen-Brubaker & Assoc.
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Mette, Evans & Woodside
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Harrisburg, Pennsylvania 17110-0950

Mr. Eric Epstein
2308 Brandywine Drive
Harrisburg, Pennsylvania 17110


Paul E. Russell

Dated: March 24, 1995
at Allentown, Pennsylvania

KIRKPATRICK & LOCKHART

THE PAYNE SHOEMAKER BUILDING
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PITTSBURGH, PA
WASHINGTON, D.C.

March 27, 1995

WRITER'S DIRECT DIAL NUMBER
(717) 231-4500

John G. Alford, Secretary
Pennsylvania Public Utility Commission
Room G-23; North Office Building
P.O. Box 3265
Harrisburg, PA 17105-3265

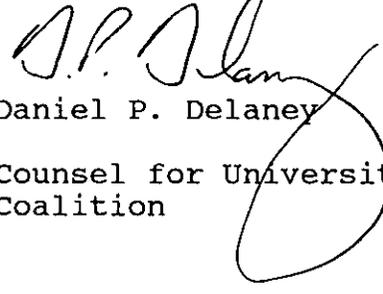
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55 MAR 28 AM 10:20
PA. P. U. C. DIV.
INFO. CONTROL DIV.

**In Re: Pennsylvania Public Utility Commission v.
Pennsylvania Power & Light Company.
Docket No. ^R00943271.**

Dear Secretary Alford:

Enclosed for filing, please find a Certificate evidencing service of the University/College Coalition's responses to the Set I Interrogatories of the Pennsylvania Power & Light Company. Copies of these materials are being served upon the parties of record as indicated on the Certificate.

Very truly yours,



Daniel P. Delaney
Counsel for University/College
Coalition

Enclosures

cc: Parties of Record

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, et al.

v.

PENNSYLVANIA POWER & LIGHT
COMPANY

Docket No. R-0094327-1A

DOCUMENT
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CERTIFICATE OF SERVICE

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95 MAR 28 11:10:20
INFO CONTROL DIV.

I hereby certify that I have this day served a copy of UCC's responses to the Set I Interrogatories of the Pennsylvania Power & Light Company, upon the parties identified below in accordance with the requirements of Section 1.54 (relating to service by a participant).

SERVICE BY FIRST-CLASS MAIL ON THE FOLLOWING:

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MAR 30 1995

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Catherine Panchou Cox
Harvey, Pennington, Herting &
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VIA OVERNIGHT DELIVERY AS FOLLOWS:

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Anthony C. DeCusatis, Esq.
David B. MacGregor, Esq.
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(717) 231-4500
(717) 231-4501 (Facsimile)



Daniel P. Delaney, Esq.
Counsel For University/College
Coalition

DATED: March 27, 1995

APPEARANCE SHEET

ALJ HEARING REPORT

KJR

Docket No. R-009432717

R-00943271C0001-C0130

Case Name PA PUC v. Pennsylvania

Power and Light Company

Location Harisburg 30

Date March 27, 28, 29, 1995

ALJ Christianson

Reporting Firm Commonwealth Reporting

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APR 19 1995

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APR 4 1995

OFFICE OF C.A.L.J.
PUBLIC UTILITY COMMISSION

DOCUMENT FOLDER

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES NO
 Hearing held YES NO
 Testimony taken YES NO
 Transcript due YES NO
 Hearing concluded YES NO
 Further hearing needed YES NO

Estimated add'l days as scheduled

RECORD CLOSED YES NO

DATE _____

Briefs to be Filed YES NO

DATE _____

BENCH DECISION

REMARKS:

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APR 18 11:10 AM '95
INTELLIGENCE CONTROL DIV.

NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD
PLEASE PRINT CLEARLY
INCOMPLETE INFORMATION MAY RESULT IN DELAY OF PROCESS.

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Mary C. Kenney Cicilia P. Brighola Tanya J. McCloskey Telephone No. 717 783-5048	1425 Strawberry St City Hbg State PA Zip 17102	Office of Consumer Advocate

CHECK THIS BOX IF ADDITIONAL PARTIES

OR COUNSEL OF RECORD APPEAR ON BACK.

3/27 John A. Kelly, CRC, Inc.
 3/28 Sandia Miller Brown REPORTER
 3/29 Judith A. Valencik
 3/30 Sanara Miller Brown

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Karen Oill Mowry Telephone No. (717) 783-2525	300 N. 2nd St. City Hbg State PA Zip 17101	Office of Small Business Advocates
PAUL E. RUSSELL Telephone No.	2 NORTH 9TH ST. City ALLENTOWN State PA Zip 18101	PP & L
Kenneth Zielmis Stevens & Lee Telephone No. 717-234-1250	208 N. Third St. Suite 310 City HBG State PA Zip 17108	Crown American
Donald P. Debnay Kieffer, Kerckhoff & Lock Telephone No. (717) 231-4500	240 N. 3rd St. City Hbg State PA Zip 17110	University/College Collector
JOAN BRANDEIS Schnader, Harrison, Segal & Lewis Telephone No. 215-751-2278	1600 Market St. City Phila State Pa Zip 19103	Bethlehem Steel Corporation
Robert P Haynes Telephone No. 717 232 5000	Mette, Evans & Woodside 3401 N. Front St City Hbg State PA Zip 17110	Central Eastern Penna. Fuel Oil Dealers
CRAIG Kuentzen 3 Telephone No. 717 826 0510	211 S. MAIN ST City WILKES-BARRE State PA Zip 18701	Commission on Economic Opportunity
Derrick P. Williamson McNees, Wallace & Nurick Telephone No.	P.O. Box 1166 City HBG State PA Zip 17108	PP & L Industrial Customer Alliance
ERIC EPSTEIN Telephone No.	City State Zip	

MCNEES, WALLACE & NURICK

ATTORNEYS AT LAW

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TELEPHONE (717) 232-8000

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ERIC L. BROSSMAN
ROBERT M. CHERRY
WILLIAM A. CHESNUTT
DAVID B. DISNEY
MICHAEL A. DOCTROW
ELIZABETH A. DOUGHERTY
HARVEY FREDENBERG
JAMES L. FRITZ
FRANCIS B. HAAS, JR.
W. JEFFRY JAMOUNEAU
MICHAEL G. JARMAN
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BERNARD A. LABUSKES, JR.

DELANO M. LANTZ
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DAVID E. LEHMAN
CLYDE W. MCINTYRE
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ROBERT A. MILLS
STEPHEN A. MOORE
HERBERT R. NURICK
JOHN S. OYLER
TIMOTHY J. PFISTER
GARY A. RITTER
EDWARD W. ROTHMAN
DANA STEVENS SCAUTO
ROBERT D. STETS
RICHARD W. STEVENSON
DIANE M. TOKARSKY

DAVID M. WATTS, JR.
STEVEN J. WEINGARTEN
NEAL S. WEST
NORMAN I. WHITE
LAWRENCE R. WIEDER
GARY F. YENKOWSKI
WILLIAM M. YOUNG, JR.

ERIC N. ATHEY
DAVID M. BAKER
JONATHAN C. BERRY
BRETT D. DAVIS
JAMES P. DEANGELO
JAMES P. DOUGHERTY
KATHLEEN A. DUNST
ROBERT J. GOODTO

SCOTT A. GOULD
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PETER F. KRIETE
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CAMILLE C. MARION
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SHARON R. PAXTON
CHUONG H. PHAM
JONATHAN H. RUDD
BRUCE R. SPICER
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DERRICK P. WILLIAMSON

March 28, 1995

David B. MacGregor, Esquire
Morgan, Lewis & Bockius
2000 One Logan Square
Philadelphia, PA 19103-6993

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

Dear Mr. MacGregor:

Enclosed are two copies of the Responses of PP&L Industrial Customer Alliance to Interrogatories and Requests for Production of Documents and Data of Pennsylvania Power & Light Company - Set 1, Questions 1-12.

As indicated by the attached Certificate of Service, copies of these responses have been served upon all parties of record.

Very truly yours,

MCNEES, WALLACE & NURICK

By

David M. Kleppinger / gm

David M. Kleppinger

**DOCUMENT
FOLDER**

DMK:mas

Enclosures

c: John G. Alford, Secretary (w/o Enclosure)
Honorable Robert A. Christianson (w/o Enclosure)

KJR
RECEIVED
MAR 28 AM 8:39
PA. P. U. C. DIV.
O. CONTROL

APR 05 1995

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on all known parties of record to this proceeding, by

First Class Mail, addressed as follows:

**DOCUMENT
FOLDER****OFFICE OF ADMINISTRATIVE LAW
JUDGES**

Hon. Robert A. Christianson
Administrative Law Judge
PA Public Utility Commission
G-08A North Office Building
P. O. Box 3265
Harrisburg, PA 17105-3265

**PENNSYLVANIA POWER & LIGHT
COMPANY**

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BETHLEHEM STEEL CORPORATION

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Drazen-Brubaker & Associates, Inc.
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DEPARTMENT OF DEFENSE

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Attorney
Regulatory Law Office
Office of The Judge Advocate
General
Department of the Army,
DAJA-RL 3848
901 N. Stuart Street, Room 713
Arlington VA 22203-1837

UNIVERSITY/COLLEGE COALITION

Daniel P. Delaney, Esquire
James P. Melia, Esquire
Kirkpatrick & Lockhart
204 North Third Street
Harrisburg, PA 17101-1507

Certificate of Service
Docket No. R-00943271
Page 2

THE LANCASTER CHAMBER OF
COMMERCE AND INDUSTRY
Christopher S. Underhill,
Esquire
Hartman Underhill & Brubaker
221 East Chestnut Street
Lancaster, PA 17602

MID-ATLANTIC ENERGY PROJECT (SIERRA
CLUB)
Alan J. Barak, Esquire
Mid-Atlantic Energy Project
Weidner Energy Law Clinic
3700 Vartan Way
Harrisburg, PA 17110-9450


David M. Kleppinger, Esquire

Dated this 28th day of March, 1995, in Harrisburg, 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

KJF

FAX: 610/774-6726

March 28, 1995

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

DOCUMENT
FOLDER

RECEIVED
95 MAR 30 PM 12:26
PA. P. U. C. DIV.
INFO. CONTROL

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 active participants in this proceeding.

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

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

cc: The Honorable Robert A. Christianson

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 IV numbered 101, 102 and 129 upon
the active participants listed below, in accordance with the requirements of
§ 1.54 (relating to service by a participant):

FIRST CLASS MAIL

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Harrisburg, Pennsylvania 17120

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DOCKETED
APR 03 1995

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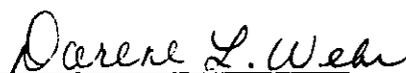
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Dorene L. Wehr

Dated: March 28, 1995
at Allentown, Pennsylvania

COMMONWEALTH OF PENNSYLVANIA



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OFFICE OF CONSUMER ADVOCATE
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

IRWIN A. POPOWSKY
Consumer Advocate

(717) 783-5048

March 29, 1995

DOCUMENT
FOLDER

John G. Alford, Secretary
PA Public Utility Commission
Room G-18, North Office Bldg.
Harrisburg, PA 17105-3265

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95 MAR 29 PM 3:30
PA. P. U. C.
INFO. CONTROL DIV.

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

Dear Secretary Alford:

Enclosed for filing please find a Certificate of Service certifying that, on March 29, 1995 the Office of Consumer Advocate served upon Pennsylvania Power and Light Company, and the other parties to the above-referenced case, the responses of the Office of Consumer Advocate to Pennsylvania Power and Light Company's Interrogatories, Set I.

Very truly yours,

Mary C. Kenney
Assistant Consumer Advocate

19144
Enclosures
cc: All parties of record

3.29
21

CERTIFICATE OF SERVICE

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

DOCKETED

APR 06 1995

I hereby certify that I have this day served a true copy of the foregoing document, The Office of Consumer Advocate's Responses to Pennsylvania Power and Light Company's Interrogatories Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 29th day of March, 1995.

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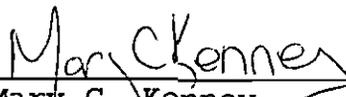
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DIAL DIRECT (215) 963-5448

March 30, 1995

BY FEDERAL EXPRESS

John G. Alford, Secretary
Pennsylvania Public Utility Commission
Room G-23, North Office Building
Commonwealth & North Streets
Harrisburg, PA 17120

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PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

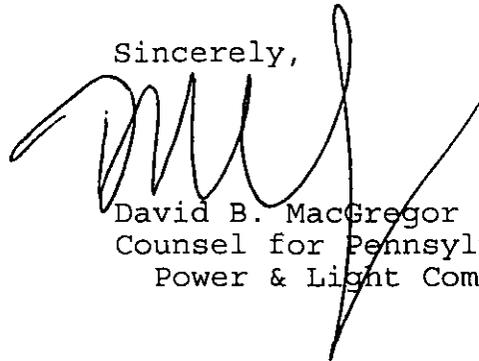
Re: Pennsylvania Public Utility Commission
v.
Pennsylvania Power & Light Company
Docket No. R-00943271

Dear Secretary Alford:

Enclosed please find an original and three copies of
Pennsylvania Power & Light Company's Objections to
University/College Coalition Interrogatories, Set I.

As indicated on the attached Certificate of Service,
copies of the enclosed have been served on all active parties of
record.

Sincerely,



David B. MacGregor
Counsel for Pennsylvania
Power & Light Company

DOCUMENT
FOLDER

DBM\jta
Enclosures
cc: Certificate of Service

49
3/30/95

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION :
v. : Docket No. R-00943271
PENNSYLVANIA POWER & LIGHT :
COMPANY :

OBJECTION OF PENNSYLVANIA POWER & LIGHT COMPANY
TO THE UNIVERSITY/COLLEGE COALITION ("UCC")
INTERROGATORY SET I

Pennsylvania Power & Light Company ("PP&L"), pursuant to 52 Pa. Code § 5.342, by its attorneys, files herewith the following Objection to the University/College Coalition Interrogatory Set I:

On March 21, 1995, the University/College Coalition served upon PP&L its Interrogatory Set I consisting of the following question:

Please provide cost-of-service studies for the future test year at present and proposed rates which use for allocation factors D 10, D 15, and D-20 class coincident peak demands for the following three months: January, February and December. Please include in the response a complete printout of the studies and all work papers that were utilized to derive the allocation factors.

The Company objects to this interrogatory on the grounds that it is irrelevant, overly broad, unreasonably burdensome, and would require an unreasonable investigation.

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This interrogatory would require the Company to prepare completely new cost of service studies employing differing allocation factors than those used by the Company. As a general rule, the Company has not objected to interrogatories which require some reasonable investigation and analysis. However, requiring the Company to prepare a totally new cost of service study is clearly unreasonable and would improperly require the Company to prepare its opponent's case.

In accordance with the Commission's filing regulations at 52 Pa. Code §53.53, Exhibit C(IV)(E)(1), the Company has already supplied the results of cost of service studies employing three different methodologies: (1) the Company's preferred 12 coincident peak method; (2) a winter peak method; and (3) an average and excess method. These three methods provide a broad range of results employing substantially different allocation methods and clearly provide a broad basis for judging the reasonableness of the Company's proposed revenue allocations and rate design. The filing of an additional study using three winter peak months would not provide any substantial additional useful information in this proceeding. This is particularly true in light of this Commission's decisions which have repeatedly recognized that cost of service is only a guide in judging the reasonableness of class revenue allocations and rate design.

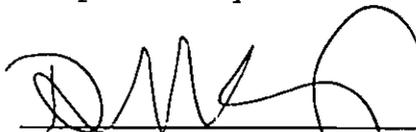
The requested study would require many man-hours of effort to prepare. Any benefits from the preparation of such a

study are clearly outweighed by the burden imposed on the Company.

Finally, it should be emphasized that the Company's 12 coincident peak method has been utilized by the Company and accepted by the Public Utility Commission and the Federal Energy Regulatory Commission in many prior PP&L proceedings. There is no reasonable basis to require the Company to prepare further studies, where the Company's preferred study has been repeatedly accepted by the Commission and where three studies are already part of the record.

WHEREFORE, for the reason set forth above, the Company's objection to the University/College Coalition Interrogatory Set I, Question No. 1 should be granted and the Company should not be required to respond as noted herein.

Respectfully submitted,



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Counsel for Pennsylvania Power &
Light Company

OF COUNSEL:

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(215) 963-5448

Date: March 30, 1995

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, ET AL.

v.

PENNSYLVANIA POWER & LIGHT
COMPANY

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DOCKET NO. R-00943271

CERTIFICATE OF SERVICE

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

BY FIRST CLASS MAIL

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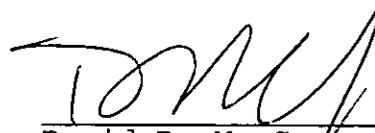
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Dated: March 30, 1995



David B. MacGregor
Counsel for Pennsylvania Power
& Light Company

ALJ HEARING REPORT

Docket No. R-00943271

R-00943271C0001-C0130

Case Name PA PUC v. Pennsylvania Power and Light Company

Location Harrisburg

Date March 30, 1995

ALJ Christianson

Reporting Firm Commonwealth

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Hearing held YES NO
Testimony taken YES NO
Transcript due YES NO
Hearing concluded YES NO
Further hearing needed YES NO
Estimated add'l days schedule

Briefs to be Filed YES NO
BENCH DECISION YES NO
REMARKS:

DATE
DATE

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NAMES, ADDRESSES AND TELEPHONE NUMBERS OF PARTIES OR COUNSEL OF RECORD

PLEASE PRINT CLEARLY

INCOMPLETE INFORMATION MAY RESULT IN DELAY OF PROCESS

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Cecile Anne Jency
REPORTER

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Telephone No.		City	State	Zip
Telephone No.		City	State	Zip
Telephone No.		City	State	Zip
Telephone No.		City	State	Zip

APPEARANCE SHEET

ALJ HEARING REPORT

KJR

Docket No. R-00943271

Case Name Pa. P.U.C. v. PP&L

Location Lancaster

Date March 31, 1995

ALJ TURNER

Reporting Firm Commonwealth

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing held YES NO

Hearing held YES NO

Testimony taken YES NO

Transcript due YES NO

Hearing concluded YES NO

Further hearing needed YES NO

Estimated add'l days as scheduled

RECORD CLOSED YES NO

Briefs to be Filed YES NO

BENCH DECISION YES NO

REMARKS:

DATE _____

DATE _____

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APR 19 1995

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<i>See attached sheet</i>				
Telephone No.	City	State	Zip	
Telephone No.	City	State	Zip	

CHECK THIS BOX IF ADDITIONAL PARTIES OR COUNSEL OF RECORD APPEAR ON BACK.

ATTACHED SHEET

REPORTER

Public Input Hearing for: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light

Docket No.: R-00943271

Date: March 31, 1995

Location: Lancaster

APPEARANCE SHEET

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Court Reporters Commonwealth Reporting Co., Inc. 1:30 = Sandra Mulus Brown
7:00 Judith A. Valencik

Public Input Hearing for: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light

Docket No.: R-00943271

Date: March 31, 1995

Location: Lancaster

1:30 p.m.

Testimony Sign-In Sheet (Please Print)

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✓ Robert Wash.	U.S. Loc. 166 BRIDGE ST COLUMBIA	U S LOCK & HARDWARE CO
✓ Fred V. Wardell	349 N. Homestead Dr. Loudsville 17538	self
✓ Mamee Powers	110 N. Line St- Lancaster, PA	YWCA of Lancaster
✓ BILL KOPETZ	148 W AIRPORT RD LITITZ PA 17543	PASCALONTERRA INC.
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✓ HARRY C SMITH	68 MCKELVEY LANE HOLTWOOD PA	SELF
✓ Dan Witmer	100 South Queen St Lancaster	Lancaster Chamber of Commerce
✓ CRAIG GORDON	P.O. Box 308 DENVER, PA.	SYLVIA TECHNOLOGIES INC KALAS MFG, INC.

APR 5 1995

Public Input Hearing for: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light

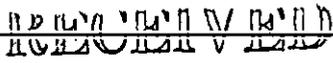
Docket No.: R-00943271

Date: March 31, 1995

Location: Lancaster

1:30 p.m.

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	PUBLIC UTILITY COMMISSION	

Public Input Hearing for: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light

Docket No.: R-00943271

Date: March 31, 1995

Location: Lancaster

7:00 p.m.

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JOSEPH A. GEHRIS	803 HAGER ST. LANC. PA. 17603	MYSELF
	