

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

3/75

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

THE TOLEDO EDISON COMPANY, and)
THE CLEVELAND ELECTRIC ILLUMINATING)
COMPANY)
(Davis-Besse Nuclear Power Station))

AEC Docket No. 50-346A

THE CLEVELAND ELECTRIC ILLUMINATING)
COMPANY, ET AL.)
(Perry Nuclear Power Plant, Units 1)
and 2))

AEC Dockets Nos. 50-440A
50-441A

ANSWER OF THE CLEVELAND ELECTRIC ILLUMINATING
COMPANY TO THE SUPPLEMENTAL INTERROGATORIES
OF THE DEPARTMENT OF JUSTICE

Pursuant to Rule 2.740 of the Commission's Restructured Rules of Practice, The Cleveland Electric Illuminating Company ("Company") submits the following responses to Supplemental Interrogatories 1 through 6 as propounded by the Department of Justice.

Supplemental Interrogatory 1:

Since September 1, 1965, has Company ever directly or indirectly transmitted electric power and/or energy (whether originating inside or outside Company's system) from its transmission system to the transmission system of any electric utility (whether directly interconnected with Company or not) engaged in the utilization, sale or further transmission of that power and/or energy? If so, describe each situation, stating (a) the parties involved, (b) the time period(s) involved, (c) the amount of energy and/or power in MWH involved annually, (d) the reason(s) for the transmission(s), (e) the date of and signatories to any agreement relating to each such situation, (f) the rate(s) at which the Company billed the other electric utility(s) for each transaction, and (g) the method and factors used to determine the rate(s) listed in response to part (f) above.

Response:

The answer to Supplemental Interrogatory 1 is "yes".

(a) Since September 1, 1965, the Company has transmitted electric power and/or energy from its transmission system to the transmission systems of the following utilities named in the following contracts:

- (i) Ohio Power Company, contract dated June 14, 1962 (Exhibit A);
- (ii) Ohio Edison Company, contract dated July 29, 1964 (Exhibit B);
- (iii) Ohio Edison Company, contract dated February 23, 1965 (Exhibit C);
- (iv) Pennsylvania Electric Company, contract dated July 23, 1965 (Exhibit D);

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and, since approximately the date of the contract, the Company has transmitted electric power and/or energy from its transmission system to the transmission systems of the following utilities named in the following contracts:

- (v) PJM Group (Public Service Electric and Gas Company, Philadelphia Electric Company, Pennsylvania Power and Light Company, Baltimore Gas and Electric Company, Potomac Electric Power Company, Pennsylvania Electric Company, Metropolitan Edison Company, New Jersey Power & Light Company, and Jersey Central Power and Light Company), contract dated September 30, 1965 (Exhibit E);
- (vi) City of Cleveland, Ohio, contract dated January 20, 1970 and amendments dated March 17, 1970, June 9, 1970, and July 22, 1970) and FPC Order of May 30, 1972 in Docket E-7631, and FPC Order Docket E-9255 issued February 28, 1975, for load transfer service (Exhibit F) (see also Exhibit I);
- (vii) Ohio Edison Company, The Toledo Edison Company, Duquesne Light Company, and Pennsylvania Power Company, contract entitled "CAPCO Transmission Facilities Agreement", dated as of September 14, 1967, effective September 30, 1971 (Exhibits G, J, K, L);
- (viii) Pennsylvania Electric Company, contract dated October 21, 1966 (Exhibit H); and
- (ix) City of Cleveland, Ohio, FPC Order No. 644, dated January 11, 1973, for 69 kV service (Exhibit I) (see also Exhibit F);

and under service schedules attached to said contracts or supplements or amendments to said contracts. The Company has no actual knowledge as to whether power or energy so transmitted to transmission systems other than as set forth above was in turn resold to another transmission system.

- (b) The time periods involved in the transmission of power and/or energy to the parties, set forth in answer to paragraph (a) above, are set forth in contracts, amendments and supplements thereto, copies of which have been examined and identified by the Department of Justice, and have been transferred to Washington, D.C. for placement in the central depository in this proceeding. Copies are attached hereto as Exhibits A through L, including copies of relevant FPC Orders, and also are on file with the Federal Power Commission. Of said contracts as set forth above, the following has expired or terminated as of the date indicated:

- (1) Pennsylvania Electric Company, contract dated July 23, 1965; terminated January 1, 1967 (Exhibit D).

(c)* Year 1965 (12 months)

Ohio Edison Company, and
Ohio Power Company

535,549 megawatt-hours total --
no breakdown between Companies
available

Year 1966

Pennsylvania Electric Company ⁽¹⁾	822,035 megawatt-hours
Ohio Edison Company ⁽²⁾	1,813 megawatt-hours
Ohio Power Company	7,854 megawatt-hours
RJM Group	20,833 megawatt-hours
(1) Exhibit D	
(2) Exhibit B	

Year 1967

Ohio Edison Company ⁽¹⁾	499 megawatt-hours
Ohio Power Company	3,151 megawatt-hours
RJM Group	199,800 megawatt-hours
(1) Exhibit B	

Year 1968

Ohio Edison Company ⁽¹⁾	5,488 megawatt-hours
Ohio Power Company	18,457 megawatt-hours
RJM Group	134,841 megawatt-hours
(1) Exhibit B	

Year 1969

Ohio Edison Company ⁽¹⁾	7,307 megawatt-hours
Ohio Power Company	109,293 megawatt-hours
RJM Group	353,756 megawatt-hours
Pennsylvania Electric Company ⁽²⁾	52,264 megawatt-hours
(1) Exhibit B	
(2) Exhibit H (pumping power for Seneca Plant)	

*Source: Annual Reports of Company to Federal Power Commission (Form 1),
for applicable years.

Year 1970

City of Cleveland ⁽¹⁾	1,438 megawatt-hours
Ohio Edison Company ⁽²⁾	135,620 megawatt-hours
Ohio Power Company	61,811 megawatt-hours
PJM Group	72,956 megawatt-hours
Pennsylvania Electric Company ⁽³⁾	212,834 megawatt-hours
(1) Exhibit F	
(2) Exhibit B	
(3) Exhibit H (pumping power for Seneca Plant)	

Year 1971

City of Cleveland ⁽¹⁾	127,733 megawatt-hours
Ohio Edison Company ⁽²⁾	33,984 megawatt-hours
Ohio Edison Company ⁽³⁾	465,865 megawatt-hours
Ohio Power Company	68,567 megawatt-hours
PJM Group	350,153 megawatt-hours
Pennsylvania Electric Company ⁽⁴⁾	627,600 megawatt-hours
(1) Exhibit F	
(2) Exhibit B	
(3) Exhibit C	
(4) Exhibit H (pumping power for Seneca Plant)	

Year 1972

City of Cleveland ⁽¹⁾	138,082 megawatt-hours
Toledo Edison Company ⁽²⁾	162,753 megawatt-hours
Ohio Edison Company ⁽³⁾	147,115 megawatt-hours
Ohio Edison Company ⁽⁴⁾	245,230 megawatt-hours
Ohio Power Company	77,608 megawatt-hours
PJM Group	586,453 megawatt-hours
Pennsylvania Electric Company ⁽⁵⁾	557,677 megawatt-hours
(1) Exhibit F	
(2) Exhibit G and Exhibit J	
(3) Exhibit B	
(4) Exhibit C	
(5) Exhibit H (pumping power for Seneca Plant)	

Year 1973

City of Cleveland ⁽¹⁾	81,368 megawatt-hours
Duquesne Light Company	177 megawatt-hours
Toledo Edison Company ⁽²⁾	604,836 megawatt-hours
Ohio Edison Company ⁽⁵⁾	16,761 megawatt-hours
Ohio Edison Company ⁽³⁾	155,397 megawatt-hours
Ohio Power Company	43,779 megawatt-hours
PJM Group	306,492 megawatt-hours
Pennsylvania Electric Company ⁽⁴⁾	806,251 megawatt-hours
(1) Exhibit F	
(2) Exhibit G and Exhibit J	
(3) Exhibit B and Exhibit C	
(4) Exhibit H (pumping power for Seneca Plant)	
(5) Exhibit G and Exhibit K	

Year 1974*

Ohio Edison Company ⁽¹⁾	238,066 megawatt-hours
Ohio Edison Company ⁽²⁾	182,705 megawatt-hours
Ohio Edison Company ⁽⁷⁾	257,375 megawatt-hours
Ohio Power Company	22,924 megawatt-hours
Duquesne Light Company ⁽⁶⁾	25,678 megawatt-hours
City of Cleveland ⁽⁴⁾	161,616 megawatt-hours
PJM Group	8,669 megawatt-hours
Toledo Edison Company ⁽³⁾	523,469 megawatt-hours
Pennsylvania Electric Company ⁽⁵⁾	732,960 megawatt-hours
(1) Exhibit C	
(2) Exhibit B	
(3) Exhibit G and Exhibit J	
(4) Exhibit F and Exhibit I	
(5) Exhibit H (pumping power for Seneca Plant)	
(6) Exhibit G and Exhibit L	
(7) Exhibit G and Exhibit K	

*(Best available figures, but not audited as of date of this answer.)

In further response to paragraph (c) of Supplemental Interrogatory 1, the Company has transmitted power and/or energy which originates inside the Company's system at the Company's Eastlake Plant in Eastlake, Ohio, to Duquesne Light Company, which owns a 31.2% tenant-in-common interest in the Eastlake No. 5 Generating Unit, with a nameplate rating of 680 MW, located at said Plant. Eastlake Unit No. 5 went in commercial operation in October 1972. Electric power and/or energy from Duquesne Light's ownership share of the Unit is transmitted to Duquesne under the CAPCO Transmission Facilities Agreement (Exhibit E). Megawatt-hours so transmitted are not included in the data set forth above.

- (d) The reason(s) for the transmission(s) as set forth above are set forth in the contract terms and/or service schedules between the Company and the recipient of the power and/or energy. The reasons for transmission to the named Company under the following contracts may consist of any one or more of the following:
- (i) Ohio Power Company (Exhibit A page references): Emergency Service (p. 9-10); Coordination of Scheduled Maintenance of Generating Facilities (p. 11-12); Energy Transfer (p. 13-14); Interchange Power (Economy Energy and Non-Displacement Energy) (p. 15-16); Short Term Power (p. 17-18, 28-30, 33-34, 51-53); Interim Power (p. 22-24); Limited Term Power (p. 41-42, 51-53).
 - (ii) Ohio Edison Company (Exhibit B page references): On-Peak Interchange Power (p. 9); Off-Peak Interchange Power (p. 9); Firm Power (p. 10); Economy Interchange Power (p. 3); Short Term Power (p. 20-22).
 - (iii) Ohio Edison Company (Exhibit C, p. 25): Power supplied during outage of OE Sammis No. 6 Unit while Company's Avon No. 9 Unit is operating, under mutual back-up agreement.
 - (iv) PJM Group (Exhibit E page references): Economy Power (p. 19); Emergency Power (p. 19); Inadvertent Interchange (p. 20); Short Term Power and Energy (p. 36-39).
 - (v) Pennsylvania Electric Company (Exhibit D): Firm Power.
 - (vi) City of Cleveland, Ohio (Exhibit F): Load Transfer Service to meet emergency on City's system (p. 6, 11, 16, 32).
 - (vii) CAPCO Companies (Exhibit E, p. 13) utilization by CAPCO Companies of capacity entitlements and obligations in generating units installed or acquired by CAPCO Companies to provide for equalization of generation reserves under CAPCO generating capacity allocation procedures; Exhibit K, Unit Purchase Power (p. 5-6); Exhibit J, Unit Purchase Power (p. 5-6); Exhibit L, Unit Purchase Power (p. 5-6).
 - (viii) Pennsylvania Electric Company (Exhibit H, p. 10-11): delivery of 80% pumping power and energy required for Seneca pumped power project of which Company is 80% owner.
 - (ix) City of Cleveland, Ohio (Exhibit I): 69 kV service to meet emergency on City's system, on a temporary basis pending completion of 138 kV interconnection.
- (e) The dates of and signatories to the above agreements are set forth in the agreements themselves:

Exhibit A: p. 1, 8, 20, 21, 28, 30, 33, 34, 38, 40, 51, 53.
 Exhibit B: p. 1, 17, 20, 22.
 Exhibit C: p. 12, 30, 33, 34.
 Exhibit D: p. 7, 11, 12.
 Exhibit E: p. 4, 12, 13, 36, 38, 39.
 Exhibit F: p. 6, 10, 12, 14, 15, 24, 25, 26, 29, 30, 33.
 Exhibit G: p. 12, 51, 52.
 Exhibit H: p. 4, 13.
 Exhibit I: p. 3, 12, 13, 15.
 Exhibit J: p. 4, 10.
 Exhibit K: p. 4, 8.
 Exhibit L: p. 4, 9.

(f) The rate(s) at which the Company billed the other electric utility(s) for each transaction made pursuant to the agreements (or Order) identified in paragraph (a) above are set forth in the agreements (or Order) themselves:

Exhibit A: p. 10, 12, 14, 15, 16, 17, 18, 23, 24, 28, 29, 33, 39, 41, 42, 52.
 Exhibit B: p. 10, 11, 12, 21, 22.
 Exhibit C: p. 25.
 Exhibit D: p. 8.
 Exhibit E: p. 17, 18, 19, 20, 37.
 Exhibit F: p. 7, 8, 13, 14, 22, 24, 28, 33, 35, 38.
 Exhibit G: The obligations of the parties to this agreement to designate certain lines as "CAPCO" lines (p. 18 and 19), and to construct additional lines (p. 19-21 and 24-26), together with obligations to assume investment responsibility in said lines by ownership (p. 30) or payment of fixed charges and operating expense (p. 17, 23-24, 64-66) constitute the rate for transactions under this agreement.
 Exhibit H: p. 8.
 Exhibit I: p. 8-9.
 Exhibit J: p. 7-9.
 Exhibit K: p. 6-7, 8.
 Exhibit L: p. 7-8.

(g) The method and factors used to determine the rate(s) listed in response to paragraph (f) above in all cases were arrived at through arms-length negotiation between the Company and the party or parties with which the Company has entered into the agreement, except that the rates set forth in Exhibit I for service to the City of Cleveland were determined by Order of the Federal Power Commission, and, beginning May 30, 1972, the rates set forth in Exhibit F were determined by Order of the Federal Power Commission. The method and factors used to determine the rate(s) listed in response to paragraph (f) above are also set forth on the following pages of the applicable Exhibits:

Exhibit A: p. 25-26, 36-36, 43-49.
Exhibit B: p. 18-19.
Exhibit C: p. 1-9, 31-32, 35-38.
Exhibit D: p. 1-3.
Exhibit E: p. 1-2, 34-35.
Exhibit F: p. 2-5, 16-20, 28-29, 30-32, 34-53.
Exhibit G: p. 1-2, 6-8, 67-73.
Exhibit H: p. 1-3, 15-16.
Exhibit I: p. 6-9, 22-27.
Exhibit J: p. 1-3, 11-15.
Exhibit K: p. 1-3, 9-15.
Exhibit L: p. 1-3, 11-17.

In responding to this Supplemental Interrogatory 1, the Company's Answer is made on the basis of delivery and receipt of power and/or energy as scheduled, it being recognized that in interconnected system operation it is physically impossible to determine the source of any power delivered to any point of utilization. Energy transmitted by the Company is not allocated in particular amounts to specific delivery points.

Supplemental Interrogatory 2:

Since September 1, 1965, has Company ever refused any request, either formal or informal, to transmit electric power and/or energy in the manner described above in Interrogatory No. 1? If so, describe each such request by (a) the date of the request, (b) the party making the request, (c) the proposed supplying and receiving parties, (d) the requested transmission route, (e) the amount of power involved, (f) the time period involved, (g) the reasons for Company's decision with regard to this request, and (h) the identity by date, author(s) and subject matter of any documents relating thereto.

Response:

The answer to Supplemental Interrogatory 2 is "no", other than as follows:

- (a) Date of Request: May 1, 1973.
- (b) Party Making the Request: American Municipal Power-Ohio, Inc.
- (c) Supplying and Receiving Parties: Power Authority of the State of New York (Supplier); City of Cleveland, Ohio (Receiver).
- (d) Requested Transmission Route: Power Authority of the State of New York (over lines of its New York wheeling agent) to a point of interconnection with Pennsylvania Electric Company, and over Pennsylvania Electric Company lines to a point of interconnection with CEI, and over CEI lines to a point of interconnection with the City of Cleveland, Ohio.

- (e) Amount of Power Involved: Thirty (30) megawatts.
- (f) Time Period Involved: Not specified.
- (g) Reasons for the Company's Decision with Regard to Request: CEI competes with the Cleveland Municipal Light Plant on a customer-to-customer and street-to-street basis in a sizeable portion of the City of Cleveland. This competitive situation is clearly unique. CEI by law is precluded from access to PASNY low-cost power. As a matter of sound business judgment, CEI determined, based on facts existing at the time CEI was called upon to make a decision, that use of its facilities to transmit PASNY power to the City of Cleveland would provide City of Cleveland Municipal System with electric energy at a cost which would unfairly increase the competitive advantage in the City of Cleveland already enjoyed by the Cleveland municipal system.
- (h) Documents Relating to Said Request: Relevant documents have been made available previously to the Department of Justice and to the NRC (AEC) in this proceeding. However, for the convenience of the Department of Justice attorneys, documents relating to the request are attached hereto as Exhibit P.

The Company has many times since September 1, 1965 refused to transmit power and/or energy or interpreted or curtailed such transmission, under the agreements set forth in answer to Supplemental Interrogatory 1, under circumstances where the requested power and/or energy would, if transmitted by the Company, result in a shortage of power and/or energy on the Company's system. No records are kept by the Company of such instances.

Supplemental Interrogatory 3:

Since September 1, 1965, has Company had electric power and/or energy transmitted to it either directly or indirectly from the transmission system of any other electric utility (whether or not said utility is directly interconnected with Company)? If so, describe each situation, stating (a) the parties involved, (b) the time period(s) involved, (c) the amounts of energy and/or power in MWH involved annually, (d) the reason(s) for the transmission(s), (e) the date of and signatories to any agreements relating to each such situation, and (f) the rate(s) at which Company was billed for each transaction.

Response:

The answer to Supplemental Interrogatory 3 is "yes".

- (a) Since September 1, 1965, the Company has had electric power and/or energy transmitted to it from the transmission systems of the following utilities named in the following contracts:

- (i) Ohio Power Company, contract dated June 14, 1962 (Exhibit A);
- (ii) Ohio Edison Company, contract dated July 29, 1964 (Exhibit B);
- (iii) Ohio Edison Company, contract dated February 23, 1965 (Exhibit C);

and, since approximately the date of the contract, the Company has had electric power and/or energy transmitted to it from the transmission systems of the following utilities named in the following contracts:

- (iv) PJM Group (the companies comprising the same being named in the Company's answer to Supplemental Interrogatory 1, contract dated September 30, 1965 (Exhibit E);
- (v) Ohio Edison Company, The Toledo Edison Company, Duquesne Light Company, and Pennsylvania Power Company, contract entitled, "CAPCO Transmission Facilities Agreement", dated as of September 14, 1967, effective September 30, 1971 (Exhibits G, M, N);
- (vi) Pennsylvania Electric Company, contract dated October 21, 1966 (Exhibit H);

and under service schedules attached to said contracts or supplements or amendments to said contracts. The Company has no actual knowledge as to whether power or energy so transmitted to it from transmission systems other than as set forth above was purchased by such system from another transmission system.

- (b) The time periods involved in the transmission of power and/or energy to the Company by the parties set forth in Answer to paragraph (a) above are set forth in the contracts, amendments and supplements thereto, copies of which have been examined and identified by the Department of Justice, and have been transferred to Washington, D.C. for placement in the central depository in this proceeding. Copies of said contracts, supplements and amendments are attached hereto as Exhibits, and said copies are also on file with the Federal Power Commission. All of said contracts are now in effect and have been since their respective effective dates.

*(c) Year 1965 (12 Months)

Ohio Edison Company ⁽¹⁾	420,610 megawatt-hours
Ohio Edison Company ⁽¹⁾)	
- and -)	526,073 (total megawatt-hours,
Ohio Power Company)	no breakdown available)
(1) Exhibit B	

* Source: Annual Reports of Company to Federal Power Commission (Form 1) for applicable years.

Year 1966

Ohio Power Company	355,584 megawatt-hours
Ohio Edison Company (1)	574,460 megawatt-hours
(1) Exhibit B	

Year 1967

Ohio Power Company	855,918 megawatt-hours
Ohio Edison Company (1)	493,223 megawatt-hours
RJM Group	5,755 megawatt-hours
(1) Exhibit B	

Year 1968

Ohio Power Company	1,677,963 megawatt-hours
Ohio Edison Company (1)	178,020 megawatt-hours
RJM Group	5,828 megawatt-hours
(1) Exhibit B	

Year 1969

Ohio Edison Company (1)	653,134 megawatt-hours
Ohio Edison Company (2)	616,396 megawatt-hours
Ohio Power Company	1,126,882 megawatt-hours
RJM Group	38,499 megawatt-hours
Pennsylvania Electric Company (3)	35,903 megawatt-hours
(1) Exhibit C	
(2) Exhibit B	
(3) Output of Seneca Plant	

Year 1970

Ohio Edison Company (1)	576,970 megawatt-hours
Ohio Edison Company (2)	1,181,711 megawatt-hours
RJM Group	301,314 megawatt-hours
Ohio Power Company	337,242 megawatt-hours
Pennsylvania Electric Company (3)	159,527 megawatt-hours
(1) Exhibit C	
(2) Exhibit B	
(3) Output of Seneca Plant	

Year 1971

Ohio Edison Company ⁽¹⁾	165,098 megawatt-hours
Ohio Edison Company ⁽²⁾	573,699 megawatt-hours
Ohio Power Company	135,177 megawatt-hours
RJM Group	201,517 megawatt-hours
Pennsylvania Electric Company ⁽³⁾	460,556 megawatt-hours
(1) Exhibit C	
(2) Exhibit B	
(3) Output of Seneca Plant	

Year 1972

Ohio Edison Company ⁽¹⁾	398,339 megawatt-hours
Ohio Edison Company ⁽²⁾	933,833 megawatt-hours
Ohio Power Company	355,013 megawatt-hours
RJM Group	230,792 megawatt-hours
Pennsylvania Electric Company ⁽³⁾	415,437 megawatt-hours
(1) Exhibit C	
(2) Exhibit B	
(3) Output of Seneca Plant	

Year 1973

Ohio Edison Company ⁽¹⁾	1,066,936 megawatt-hours*
Ohio Power Company	921,241 megawatt-hours
RJM Group	68,955 megawatt-hours
Pennsylvania Electric Company ⁽²⁾	595,277 megawatt-hours
Duquesne Light Company ⁽³⁾	775 megawatt-hours
(1) Exhibit B and Exhibit C	
(2) Output of Seneca Plant	
(3) Exhibit G and Exhibit M	

* Includes 52 megawatt-hours purchased pursuant to an agreement among the CAPCO Companies dated May 29, 1969, as amended May 26, 1971, as its share of energy from the Michigan Companies (Exhibit O). (The purchase was by Toledo Edison Company; the point of receipt of this energy was at interconnection points between Ohio Edison Company and CEI.) This entitlement terminated November 1, 1973.

Year 1974*

Ohio Edison Company ⁽¹⁾	238,066 megawatt-hours
Ohio Edison Company ⁽²⁾	182,705 megawatt-hours
Ohio Power Company	413,059 megawatt-hours
RJM Group	67,601 megawatt-hours
Duquesne Light Company ⁽³⁾	57,104 megawatt-hours
Toledo Edison Company ⁽⁴⁾	1,212 megawatt-hours
Pennsylvania Electric Company ⁽⁵⁾	536,757 megawatt-hours

(1) Exhibit C
(2) Exhibit B
(3) Exhibit E and Exhibit M
(4) Exhibit E and Exhibit N
(5) Output of Seneca Plant

*(Best available figures, but not audited as of date of this answer.)

(d) The reason(s) for the transmission(s) as set forth above are set forth in the contract terms and/or service schedules between the Company and the company transmitting the power and/or energy. The reasons for transmission to the Company under the following contracts may consist of any one or more of the following:

- (i) Ohio Power Company (Exhibit A page references): Emergency Service (p. 9-10); Coordination of Schedule Maintenance of Generating Facilities (p. 11-12); Energy Transfer (p. 13-14); Interchange Power (Economy Energy and Non-Displacement Energy) (p. 15-16); Short Term Power (p. 17-18, 28-30, 33-34, 51-53); Interim Power (p. 22-24); Limited Term Power (p. 41-42, 51-53).
- (ii) Ohio Edison Company (Exhibit B page references): On-Peak Interchange Power (p. 9); Off-Peak Interchange Power (p. 9); Firm Power (p. 10); Economy Interchange Power (p. 3); Short Term Power (p. 20-22); Unit Purchase Power (p. 28-32, 41-46).
- (iii) Ohio Edison Company (Exhibit C page references): Purchase of one-half of output of OE Sammis No. 6 Unit until commercial operation of Company's Avon No. 9 Unit (p. 15-16); and thereafter power received during outage of Company's Avon No. 9 Unit while OE's Sammis No. 6 Unit is operating, under mutual back-up agreement (p. 25).
- (iv) RJM Group (Exhibit E page references): Economy Power (p. 19); Emergency Power (p. 19); Inadvertent Interchange (p. 20); Short Term Power and Energy (p. 36-39).
- (v) CAPCO Companies (Exhibit E, p. 13): Utilization by CAPCO Companies of capacity entitlements and obligations in generating units installed by CAPCO Companies to provide for equalization of reserves under CAPCO generating capacity allocation procedures; Exhibit M, Surplus Power (p. 5-6); Exhibit N, Surplus Power (p. 4-5).

(vi) Pennsylvania Electric Company (Exhibit H, p. 10-11):
Delivery of 80% of output of Seneca pumped power project
of which Company is 80% owner.

(vii) "Michigan Purchase" (Exhibit O): Firm power purchase.

(e) The dates of and signatories to the above agreements are set forth in
the agreements themselves:

Exhibit A: p. 1, 8, 20, 21, 28, 30, 33, 34, 38, 40, 51, 53.
Exhibit B: p. 1, 17, 20, 22, 28, 32, 41, 46.
Exhibit C: p. 12, 30, 33, 34.
Exhibit E: p. 4, 12, 13, 36, 38, 39.
Exhibit G: p. 12, 51, 52.
Exhibit H: p. 4, 13.
Exhibit M: p. 7.
Exhibit N: p. 6.
Exhibit O: p. 1, 2, 13.

(f) The rate(s) at which the Company was billed by the other utility(s) for
each transaction made pursuant to the agreement identified in paragraph
(a) above are set forth in the agreements themselves:

Exhibit A: p. 10, 12, 14, 15, 16, 17, 18, 23, 24, 28, 29,
33, 39, 41, 42, 52.
Exhibit B: p. 10, 11, 12, 21, 22, 30-31, 44-45.
Exhibit C: p. 17-24, 25.
Exhibit E: p. 17, 18, 19, 20, 37.
Exhibit G: The obligations of the parties to this agreement
to designate certain lines as "CAPCO" lines (p. 18
and 19), and to construct additional lines (p. 19-21
and 24-26), together with obligations to assume
investment responsibility in said lines by ownership
(p. 30) or payment of fixed charges and operating
expenses (p. 17, 23-24, 64-66) constitute the rate
for transactions under the agreement.
Exhibit H: p. 8.
Exhibit M: p. 6-7.
Exhibit N: p. 5-6.
Exhibit O: p. 11-12, 14-15

In responding to this Supplemental Interrogatory 3, the Company's Answer is
made on the basis of delivery and receipt of power and/or energy as scheduled,
it being recognized that in interconnected system operation it is physically
impossible to determine the source of any power delivered to any point of
utilization. Energy received by the Company is not allocated in particular
amounts to specific delivery points.

Supplemental Interrogatory 4:

State each request, either formal or informal, since September 1, 1965 made by any electric utility to Company for a new or altered interconnection arrangement, giving (a) the name of the entity, (b) the date of the request, (c) the date of any agreement to interconnect, (d) the reasons for any refusal to interconnect, and (e) the date and author(s) of any document relating to any such refusal.

Response:

The following requests by an electric utility for new or altered interconnection arrangements with CEI were made since September 1, 1965, all of which were implemented:

- (a) Request of the Pennsylvania Electric Company for conversion of the CEI-Pennsylvania Electric Company interconnection from 230 kV to 345 kV, including the establishment of the Erie-West Substation. This conversion was planned in the facilities' original agreement establishing the interconnection, dated July 23, 1965. The conversion took place in October, 1969 (see CEI Rate Schedule FPC No. 5, made available in response to Joint Document Request No. 3).
- (b) Request of the Ohio Edison Company for the addition of the Ohio Edison 345 kV-138 kV transmission substation (Hanna Substation) on CEI's 345 kV line between the Juniper Substation and CEI's interconnection point with the Ohio Power Company, east of Ohio Power's Canton Central Substation located near East Canton, Ohio. The decision to implement this request is documented in the CAPCO Memorandum of Agreement dated September 14, 1967, made available in response to Joint Document Request No. 15. The Hanna Substation was put into service in April, 1972. Facilities' agreements between CEI and each of the other two companies (Ohio Edison and Ohio Power) were appropriately modified to reflect this interconnection change by documents dated March 21, 1972, made available in response to Joint Document Request No. 15.
- (c) Request of the Ohio Edison Company for the addition of a second 138 kV circuit between CEI's Lorain Substation in Avon, Ohio, and Ohio Edison's Johnson Substation in Elyria, Ohio. This addition was originally planned for the spring of 1970, but due to a delay in acquiring the right-of-way, completion of the new interconnection did not take place until the spring of 1974. The agreement covering the new facility was signed on April 2, 1974, and is made available in response to Joint Document Request No. 15.
- (d) The Request of the Pennsylvania Electric Company for the addition of a 345 kV-135 kV transformer at the Pennsylvania Electric Company's Erie-West Substation; this addition involved metering rearrangements at the Erie-West end of the interconnection. The new transformer was discussed initially in April of 1972; CEI's letter concurring with the installation of the transformer is dated November 17, 1973, and is made available in response to Joint Document Request No. 15. The transformer was energized on February 27, 1974.

- (e) Ohio Edison Company also made requests for two additional interconnections between CEI and Ohio Edison. Both requests were made prior to September 1, 1965, and the agreements to install the requested facilities were signed prior to said date; however, actual installation occurred subsequent to September 1, 1965; These additional interconnections were the 345 kV Juniper-Star Line (put into service in June, 1968), and the 345 kV Avon-Beaver (West Lorain) Line (put into service in May, 1970).
- (f) Requests leading to membership by the Company in the power pool known as CAPCO have resulted in construction of transmission facilities and new or altered interconnection arrangements, as set forth in Exhibit G, attached, and in the recently executed CAPCO Basic Operating Agreement, Exhibit Q.
- (g) Request of the City of Cleveland, Ohio for participation in the CAPCO pool, made on April 4, 1973, followed by a request by the City for participation in the Perry Plant made on April 13, 1973, such requests being combined and supplemented in a request for participation in the Perry Units, in Beaver Valley Unit No. 2, and in Davis-Besse Unit No. 1 and for membership in CAPCO, made on August 3, 1973. The Company, although having serious question as to the bona fides of such requests, has not refused such requests, and has offered to meet them (i) by vigorously pursuing negotiations with the City looking to culmination of a 138 kV interconnection with the City as called for by Order of the Federal Power Commission (Opinion No. 644, dated January 11, 1975, Exhibit I) as further set forth in paragraph (h) below, and (ii) by having offered the City participation in the Perry Units, Beaver Valley Unit No. 2, and Davis-Besse Unit No. 1, as well as participation in future units, as early as December 13, 1973.
- (h) Request of the City of Cleveland, Ohio in late December 1969 for emergency aid. This request was implemented by agreement between the Company and the City dated January 20, 1970 (Exhibit F) under which the Company agreed to serve approximately 36,000 KVA of the City's load from five load transfer points on the Company's system. Service under this temporary agreement has been provided by the Company to the City since February 1970. Negotiations between the Company and the City for a permanent interconnection between the systems were delayed because of failure of the City to pay for the load transfer service. A temporary 69 kV interconnection between the Company and the City was ordered by the FPC on January 11, 1973 (Opinion No. 644, Exhibit I); this Order further directed construction of a 138 kV interconnection between the systems to be completed by January 11, 1975. The 69 kV temporary interconnection was completed and is in service. The 138 kV permanent interconnection has not been completed as of the date of this Answer. The proposals, responses and disputes relating to interconnections between the Company and the City of Cleveland, Ohio are set forth as a matter of record in proceedings relating thereto before the Federal Power Commission. See Exhibit I and Exhibit F.

- (1) It is difficult to specify the dates of informal requests by the City of Painesville, Ohio for interconnection with the Company; however, about ten years ago the Company proposed to provide an interconnection with the City which was refused. Since then, negotiations for interconnection took place informally from time to time. Serious negotiations by the parties for interconnection began in 1973, and culminated in an interconnection agreement between the City and the Company dated January 13, 1975.

Supplemental Interrogatory 5:

Since September 1, 1965, has Company ever purchased a discernible quantity of electric power and/or energy from another electric utility at one point on its system and, within about 48 hours, sold a comparable quantity of electric power and/or energy to that same electric utility at another point on the Company's system? If so, describe each situation, stating (a) the parties involved, (b) the time period(s) involved, (c) the amount of power and/or energy in MWH involved annually, (d) the reason(s) for the transaction(s), (e) the date of and signatories to any agreements relating to each situation, (f) the rate at which Company billed the other electric utility, (g) the rate at which the other electric utility billed the Company, and (h) the method and factors used to determine the rates listed in response to parts (f) and (g).

Response:

The answer to Supplemental Interrogatory 5 is "no".

Supplemental Interrogatory 6:

Since September 1, 1965, has Company ever purchased a discernible quantity of electric power and/or energy from another electric utility at one point on its system and, within about 48 hours, sold a comparable quantity of electric power and/or energy to another electric utility (or utilities) at another point (or points) in Company's system? If so, describe each situation, stating (a) the parties involved, (b) the time period(s) involved, (c) the amount of power and/or energy in MWH involved annually, (d) the reason(s) for the transaction(s), (e) the date of and signatories to any agreements relating to each situation, (f) the rate at which Company billed the other electric utility (or utilities), (g) the rate at which the other electric utility billed the Company, and (h) the method and factors used to determine the rates listed in response to parts (f) and (g).

Response:

The answer to Supplemental Interrogatory 6 is "yes".

(a) Parties		(b) Time	(c) Annual	(d) Reason(s)
From	To	Period	MWH	
		1965	None	
		1966	None	
OP(1)	PJM(2)	1967	21,235	Emergency
OP	PJM	1968	39,275	Emergency
OP	PJM	1969	5,388	Emergency
OE(3)	PJM	1969	2,688	Emergency
OE	PJM	1970	125	Emergency
OP	PJM	1970	5,410	Emergency
OE	PJM	1971	99,277	Emergency
OE	OP	1971	900	Emergency
PJM	OE	1971	23,896	Emergency
PJM	OP	1971	13,153	Emergency
OE	OP	1972	935	Emergency
PJM	OP	1972	1,923	Emergency
PJM	OE	1972	42,764	Emergency
OP	PJM	1972	148,655	Economy
PJM	OP	1973	1,405	Emergency
PJM	OE	1973	1,833	Emergency
OP	PJM	1973	220,350	Economy
PJM	OP	1974	377	Emergency
PJM	OE	1974	9,200	Emergency
OP	OE	1974	200	Emergency

(1) Ohio Power Company

(2) PJM Group (the companies comprising the same being named in the Company's answer to Supplemental Interrogatory No. 1)

(3) Ohio Edison Company

(e) The dates of and signatories to the agreements under which the above transactions took place are set forth in the agreements themselves between the Company and Ohio Power Company (Exhibit A, p. 1, 8, 20, 21, 28, 30, 33, 34, 38, 40, 51 and 53); between the Company and the PJM Group (Exhibit E, p. 4, 12, 13, 36, 38 and 39); and between the Company and Ohio Edison Company (Exhibit B, p. 1, 17, 20, 22, 28, 32, 41 and 46).

(f) and (g) The rates at which the Company billed the utility to which power and/or energy was sold as set forth in paragraph (a) above, and the rate(s) at which the Company was billed by the utility from which power and/or energy was purchased as set forth in paragraph (a) above, are set forth in the agreements themselves between the Company and Ohio Power Company (Exhibit A, p. 10, 12, 14, 15, 16, 17, 18, 23, 24, 28, 29, 33, 39, 41, 42 and 52); the Company and the PJM Group (Exhibit E, p. 17, 18, 19, 20 and 37); and the Company and Ohio Edison Company (Exhibit B, p. 10, 11, 12, 21, 22, 30-31 and 44-45).

(h) The method and factors used to determine the rate(s) listed in response to paragraphs (f) and (g) above, in all cases were arrived at through arms-length negotiation between the Company and the party or parties with which the Company has entered into the agreement. The method and factors used to determine the rate(s) listed in response to paragraphs (f) and (g) are also set forth on the following pages of the applicable Exhibits:

Exhibit A: p. 25-26, 35-36 and 43-49.

Exhibit E: p. 1-2 and 34-35.

Exhibit B: p. 18-19.

In responding to this Supplemental Interrogatory 6, the Company's Answer is made on the basis of delivery and receipt of power and/or energy as scheduled, it being recognized that in interconnected system operation it is physically impossible to determine the source of any power delivered to any point of utilization. Energy transmitted or received by the Company is not allocated in particular amounts to specific delivery points.