

A. Interrogatories

Joint Interrogatory No. 1:

1. Designate and identify by electric utility on a large scale geographic map:
 - a. Each of Company's delivery points for wholesale power;
 - b. The location of each generating plant of Company and a designation of each plant's MW capacity;
 - c. Each interconnection point between your Company and other electric utilities.

Answer:

A large scale geographic map showing the information requested in Joint Interrogatory No. 1 is attached hereto.

Joint Interrogatory No. 2:

2. Define the geographic and product markets and submarkets upon which Company intends to rely as the relevant markets in this proceeding:
 - a. As to each product market and submarket listed in response to this question, identify and describe each factor considered in determining that it is an appropriate product market or submarket for antitrust analysis in this proceeding;
 - b. Define the geographic boundaries which are relevant for each such product market and indicate such boundaries on a large scale map;
 - c. State specifically the factors used in defining the boundaries in each

area described and delineated in 2.b., and describe each factor considered in determining that it is an appropriate geographic market or submarket for antitrust analysis in the proceeding.

Answer:

Ohio Edison Company and Pennsylvania Power Company are unable at this time to define the geographic and product markets and submarkets upon which they intend to rely as the relevant markets in this proceeding. As soon as Ohio Edison Company and Pennsylvania Power Company have formulated the position that they intend to take herein regarding the matter of relevant markets and submarkets, they will so advise the AEC Regulatory Staff, the Department of Justice and the City of Cleveland, providing at that time the information requested in Joint Interrogatory No. 2.

Joint Interrogatory No. 3:

3. Since September 1, 1965, has Company ever transmitted electric power through its system for any electric utility engaged in the utilization, sale or further transmission of that power? If so, describe each situation stating (a) the parties involved, (b) the time period involved, (c) the amount of energy in MWHRS involved annually, (d) the reasons for the transmission, and (e) the date of and signatories to any agreements relating to each such situation.

Answer:

No.

Joint Interrogatory No. 4:

4. Since September 1, 1965, has Company refused any request to transmit electric power in the manner described above in interrogatory three? If so, describe each such request by (a) the date of the request, (b) the party making the request, (c) the 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.

Answer:

No.

Joint Interrogatory No. 5:

5. Since September 1, 1965, has Company used the transmission facilities of any other electric utility to transmit electric power? If so, describe each situation, stating (a) the parties involved, (b) the time period involved, (c) the amount of energy in MWHRS involved annually, (d) the reasons for the transmission, and (e) the date of and signatories to any agreements relating to each such situation.

Answer:

No.

DOJ Interrogatory No. 1:

1. State each request since September 1, 1965, made by an 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 reason for any refusal to interconnect, and (e) the date and author(s) of any document relating to any such refusal.

Answer:

The following requests for a new or altered interconnection arrangement were made since September 1, 1965, by an electric utility to Ohio Edison Company and/or Pennsylvania Power Company:

A. City of Orrville

In 1965, the City of Orrville indicated an interest in an interconnection for the purpose of controlling its frequency. Ohio Edison Company offered to provide such service but its offer was not accepted, presumably because of the cost required to construct the necessary facilities. In 1969, the City of Orrville requested a connection for emergency power to be supplied during flooding of the City's generating plant on July 5, 1969. This request was granted. In 1970, the City asked for the cost for "non-connected service availability" for certain loads on their system. The standard municipal rate was offered to the City and they took no further action at that time. On April 24, 1973, the City requested a meeting to discuss a synchronous intertie so they could become a contributing member to any power pool with their generating capacity and stating that they were making the same request of Ohio Power Company. A meeting was held in June 1973, an engineering study was made and we replied in August 1973, stating the conditions under which we could provide such service. In December 1973, the City requested a 23 kV interconnection with a capability of 2500 to 3000 kVA for an "interim period" of the next one or two or two and one-half years for the purpose of providing backup service to an industrial customer soon to be served by Orrville while they evaluate proposals from Ohio Edison Company and Ohio Power Company to furnish a 138 kV synchronous tie with Orrville. On February 7, 1974, a proposed contract for such services was presented to a representative of the City of Orrville. On June 13, 1974, an article

appeared in The Courier Cresent stating that "an agreement has been reached which will allow Orrville to connect its power plant to Ohio Power Company's system." Because the Company has received no response from the City of Orrville, the Company has requested notification as to whether the City of Orrville is still interested in the proposed service.

On November 11, 1974, the Ohio Energy Commission (OEEC) contacted the Company requesting information on whether the Company would be in a position to interconnect and provide electric energy to the City of Orrville during the coal strike. The Company advised the OEEC that present conditions would permit the Company to provide up to 2500 kVA to the City of Orrville. This could be accomplished by replacing some taps and closing in a 23 kV line switch to energize the transformer capacity of the City of Orrville. In order to affect this interconnection, the City was to contact the Company so that arrangements could be made for closing the interconnection and for arriving at a proper method of payment for the energy. On November 19, 1974, the City advised Ohio Edison Company that it was no longer interested in the offer.

B. City of Oberlin

The City of Oberlin indicated an interest in an interconnection in 1970, and Ohio Edison Company expressed its willingness to make such an interconnection. On March 20, 1970, the City and the Company entered into an agreement under which the Company provided an interconnection for the purpose of selling energy at wholesale to supplement energy generated by Oberlin's own facilities. At the time of the contract, service at 69 kV was contemplated, but delays in construction of facilities to take service at 69 kV led to service being supplied temporarily by the Company at 12.5 kV until June 1, 1971. Service at 69 kV is provided pursuant to FPC Rate Schedule No. 73. The service at 12.5 kV was supplied under FPC Rate Schedule No. 73.1. Service to Oberlin

presently being provided under the Company's standard rate schedule for municipal resale service transmission voltage effective September 1, 1972, pursuant to Federal Power Commission letter of acceptance dated November 28, 1973, in Docket No. E-7705.

In letters dated March 8, 1974 and May 7, 1974, the City requested information concerning the Company's requirements for the Oberlin Power Plant to operate in parallel with the Company's system. After meetings on September 13, 1974 and October 12, 1974, the Company advised the City on October 21, 1974 of four facility modifications required for such operations. Representatives of the City are presently evaluating these requirements.

C. City of Norwalk

The City of Norwalk indicated an interest in an interconnection and discussions were held between Ohio Edison Company and the City on the subject from time to time during the period mid-1969 to late 1971. During that period, on July 7, 1969, emergency power was supplied by the Company to the City during flooding of the City's generating plant. The discussions referred to above concerned possible purchase by the City of all or part of its requirements and possible sale of the City's electric system to the Company. The Company expressed its willingness to consider any of these alternatives. On February 6, 1970, the City and the Company entered into an agreement under which the Company agreed to provide energy to supplement power generated by the City. Service commenced under that agreement on March 2, 1970, but the agreement was cancelled by the City on May 6, 1970. Subsequently on April 14, 1971, a new agreement for sale of energy by the Company to supplement energy generated by the City was entered into. Service was first supplied under FPC Rate Schedule No. 72. Council of the City ultimately decided to sell its system to the Company, and an agreement therefor was made on March 18, 1972. On September 22, 1972, the Securities and Exchange Commission approved the Company's application to acquire the City's

electric system. The acquisition was consummated on October 31, 1972.

D. Village of Hiram

From time to time the Village of Hiram indicated an interest in an interconnection and on March 12, 1971, the Village asked the Company to make proposals respecting possible purchase by the Village of all or part of its requirements and possible sale of the Village's electric system to the Company. The Company made proposals respecting each of these alternatives.

Council of the City ultimately decided to sell its system to the Company, and an agreement therefor was made on January 27, 1972. The Company's application for authority to acquire the system was approved on January 5, 1973 by order of the Securities and Exchange Commission. Acquisition was consummated on January 31, 1973.

E. City of East Palestine

In March, 1972, the City of East Palestine, through its consulting engineer, requested a proposal from Ohio Edison Company to supply a 69 kV service connection at the northeast corner of its corporate limits sufficient to accommodate a normal system load of 6000 kW. In July, 1972, Company representatives contacted certain City officials and informed them that Ohio Edison Company is willing to construct the necessary 69 kV facilities from its system to the northeast corner of East Palestine at no cost to the municipality. They were informed at that time that the Company would begin planning and constructing upon receipt of a contract for service. The municipality has the matter under consideration at this time.

In January of 1973, the City requested the Company to examine the municipal plant and distribution system and make a proposal to

the City for its purchase. In June, the Company submitted its proposal to the City for the entire electric system of the City of East Palestine. This proposal is under consideration by the City at this time.

F. Rural Electric Cooperatives

Prior to August 1, 1970, the Company supplied service at wholesale to seven Rural Electric Cooperatives under FPC Rate Schedules 14, 15, 16, 17, 18, 19 and 20 and supplements thereto. Since 1960, and prior to the effective date of the agreement with Ohio Power Company referred to below, eight requests were made for additional delivery points: two for Marion Rural Electric Cooperative, Inc., which were complied with; two from Lorain-Medina Rural Electric Cooperative, Inc., which were complied with, (a third request was made but was subsequently withdrawn); two for Firelands Rural Electric Cooperative, Inc., one of which was established in 1972 and the second of which was established in 1973; and one from Holmes-Wayne Electric Cooperative, Inc., which was complied with. Under an agreement dated June 20, 1968, however, between the Company and Ohio Power Company, provision was made for purchase of power by the Company from Ohio Power Company beginning in 1970 and sale of power to Ohio Power Company at delivery points supplying the Company's former cooperative customers. Five requests for the establishment of additional delivery points under that agreement for service for ultimate use by Delaware Rural Electric Cooperative, Inc., Lorain-Medina Rural Electric Cooperative, Inc., Morrow Electric Cooperative, Inc., Licking Rural Electrification, Inc., and North Central Rural Electric Cooperative, Inc., are under consideration by the Company and Ohio Power Company.

G. Borough of Grove City

Since 1960 one request was received by Pennsylvania Power Company from the Borough of

Grove City, Mercer County, Pennsylvania, for the supply of bulk power at wholesale, and it was granted. A connection was made and on October 7, 1967, the Borough began receiving service as a municipal resale customer under Pennsylvania Power Company's FPC Rate Schedule No. 19.

H. Borough of Ellwood City, Grove City, New Wilmington, Wampum and Zelienople

In a current rate proceeding before the Federal Power Commission (E-8159) involving Pennsylvania Power, the Intervenor has taken the position that the Company should be required to file a rate schedule for 69 kV service, notwithstanding testimony by witness to the fact that none of the Boroughs are presently equipped to take or receive 69 kV service, or has any specific plans to do so at the moment. The Company has stated on the record that if, as, and when any of such Boroughs is physically prepared to take or receive service at 69 kV and to contract with Company for such service, the Company will file the appropriate rate, under the rules and regulations of the Federal Power Commission and subject to, of course, review of that Commission.

I. Ohio Valley Electric Company

Pursuant to an agreement of April 1, 1965, known as Modification No. 2 to the First Supplementary Transmission Agreement between Ohio Valley Electric Company and various other companies including Ohio Edison Company and Pennsylvania Power Company, Ohio Edison Company has established an interconnection at Dayton Power and Light Company's Greene Substation (operated and maintained by Dayton at Ohio Edison's expense) and has established an interconnection between Columbus and Southern Ohio Electric Company's Delaware Substation and Ohio Edison's Tangy

Substation operated and maintained by Ohio Edison at its own expense. The agreement is filed with the Federal Power Commission as Ohio Edison Company's FPC No. 12.7.

J. West Penn Power Company

Pursuant to an agreement of April 23, 1965, between Pennsylvania Power Company and West Penn Power Company, Pennsylvania Power Company has established two interconnections with West Penn at Krendale and Keister Substations in Pennsylvania.

K. Monongahela Power Company

Pursuant to an agreement of April 4, 1967, between Ohio Edison Company and Ohio Power Company and Monongahela Power Company, Ohio Edison has established three interconnections with Ohio Power at Galion, South Canton and Canton Central Substations in Ohio and one interconnection with Monongahela Power at Wylie Ridge Substation in West Virginia.

L. The Cleveland Electric Illuminating Company

Pursuant to an agreement dated March 21, 1972, between Ohio Edison Company and The Cleveland Electric Illuminating Company, an interconnection has been established between Ohio Edison's Hanna Substation and Cleveland Electric Illuminating's Juniper-Canton Central line.

M. Wholesale Customers of Ohio Edison

On November 27, 1972, American Municipal Power-Ohio Inc. (AMPO) inquired as to the Company's willingness to discuss participation in matters relating to bulk power supply. The Company has indicated by letter its willingness to discuss these matters. It has previously agreed with the municipalities to which it sells power at wholesale to

discuss and explore similar matters with those municipalities. On October 16, 1974, a meeting was held between Ohio Edison and the municipalities at which time a comprehensive outline was established of engineering, economic and legal studies directed toward the implementation of the general objectives of the agreement to discuss and explore participation. Each of the parties is presently collecting data and information for such studies with a meeting tentatively scheduled for ~~November~~, 1974.

N. City of Newton Falls

From time to time, the City of Newton Falls has indicated some interest in an inter-connection arrangement with Ohio Edison. On September 5, 1973, the City Council directed the City Manager "to continue to get facts, figures, and terms" from Ohio Edison regarding a tie-in with their municipal electric system. On January 24, 1974, Ohio Edison replied by offering to supply 69 kV subtransmission loop service. Pursuant to such offer, a formal contract was presented to the City on October 28, 1974. At this time, the contract is being evaluated by the City and its consultants.

O. City of Niles

On March 28, 1974, the City requested additional electric service through a new metering point to be located at a mutually agreeable site on the Company's 23 kV Niles-Meander Line. A contract was executed on April 8, 1974 for the new 23 kV delivery point and service was commenced on August 11, 1974. Both parties are presently evaluating the possibilities of the Company serving a new 138 kV substation.

B. Document Requests

The Ohio Edison Company and the Pennsylvania Power Company have made available for inspection and copying all documents requested to be produced by the AEC Regulatory Staff, the Department of Justice and the City of Cleveland, except for those documents which the Licensing Board has ruled need not be produced, and those documents which Ohio Edison Company and Pennsylvania Power Company intend to withhold from production because they contain privileged and/or confidential matter entitled to special protection. Most of the documents produced are located in the offices of the Ohio Edison Company, 47 North Main Street, Akron, Ohio; access to this material can be arranged through Thomas A. Kayuha, Esquire, of Ohio Edison. The remaining documents produced are located at the offices of Pennsylvania Power Company, 1 East Washington Street, New Castle, Pennsylvania; access to this material can be arranged through J. R. Edgerly of Pennsylvania Power Company.

December , 1974

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

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,)	Docket Nos. 50-346A
Unit 1))	50-440A
)	50-441A
THE CLEVELAND ELECTRIC ILLUMINATING)	
COMPANY, ET AL.,)	
(Perry Nuclear Power Plant,)	
Units 1 and 2))	

AFFIRMATIONS

I, D. Bruce Mansfield, am President of Ohio Edison Company and Chairman of the Board of Pennsylvania Power Company and hereby affirm that the Responses of the Companies to Joint Interrogatories No. 1 and Nos. 3-5 of the AEC Regulatory Staff and the U.S. Department of Justice, and to the separate Interrogatory No. 1 of the U.S. Department of Justice, are true and correct to the best of my knowledge and belief.

D. Bruce Mansfield

WITNESS my hand and notorial seal.

Wm. Bradford Reynolds
My Commission Expires June 30, 1975

I, Wm. Bradford Reynolds, am counsel for Ohio Edison Company and Pennsylvania Power Company and hereby affirm that the Response of the Companies to Joint Interrogatory No. 2 of the AEC Regulatory Staff and the U.S. Department of Justice is true and correct to the best of my knowledge and belief.

Wm. Bradford Reynolds
Wm. Bradford Reynolds

WITNESS my hand and notorial seal.

Dorothy L. Boone
My Commission Expires June 30, 1975

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

Before the Atomic Safety and Licensing Board

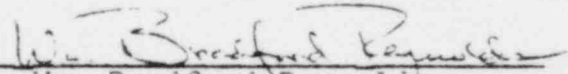
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COMPANY, ET AL.,)	
(Perry Nuclear Power Plant,)	
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Joint Answers of Ohio Edison Company and Pennsylvania Power Company to the Interrogatories and Document Requests Served Upon Them by the Other Parties" were served upon each of the persons listed on the attached Service List by U. S. Mail, postage prepaid, on this 16th day of December, 1974.

SHAW, PITTMAN, POTTS & TROWBRIDGE

By


Wm. Bradford Reynolds
Counsel for Applicants

Dated: December 16, 1974.

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

Before the Atomic Safety and Licensing Board

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THE TOLEDO EDISON COMPANY and)	
THE CLEVELAND ELECTRIC)	
ILLUMINATING COMPANY)	
)	
(Davis-Besse Nuclear Power)	Docket Nos. 50-346A
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)	50-441A
THE CLEVELAND ELECTRIC)	
ILLUMINATING COMPANY, ET AL.)	
)	
(Perry Nuclear Power Plant,)	
Units 1 and 2))	

SERVICE LIST

John B. Farmakides, Esq.
Chairman
Atomic Safety and Licensing Board
U. S. Atomic Energy Commission
Washington, D. C. 20545

John H. Brebbia, Esq.
Atomic Safety and Licensing Board
Alston, Miller & Gaines
1776 K Street, N.W.
Washington, D. C. 20006

Douglas V. Rigler, Esq.
Atomic Safety and Licensing Board
Foley, Lardner, Hollabaugh
and Jacobs
Schanin Building
815 Connecticut Avenue, N.W.
Washington, D. C. 20006

Atomic Safety and Licensing
Board Panel
U. S. Atomic Energy Commission
Washington, D. C. 20545

Mr. Chase R. Stephens
Docketing & Service Section
U. S. Atomic Energy Commission
1717 H Street, N.W.
Washington, D. C. 20545

Benjamin H. Vogler, Esq.
Office of General Counsel
Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545

Robert J. Verdisco, Esq.
Office of General Counsel
Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545

Andrew F. Popper, Esq.
Office of General Counsel
Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545

Joseph J. Saunders, Esq.
Steven Charno, Esq.
Antitrust Division
Department of Justice
Washington, D. C. 20530

Melvin G. Berger, Esq.
Antitrust Division
Department of Justice
Washington, D. C. 20530

Reuben Goldberg, Esq.
David C. Hjelmfelt, Esq.
1700 Pennsylvania Ave., N.W.
Washington, D. C. 20006

Frank R. Clokey, Esq.
Special Assistant
Attorney General
Room 219
Towne House Apartments
Harrisburg, Pennsylvania 17105

Mr. Raymond Kudukis
Director of Utilities
City of Cleveland
1201 Lakeside Avenue
Cleveland, Ohio 44114

Herbert R. Whiting, Director
Robert D. Hart, Esq.
Department of Law
1201 Lakeside Avenue
Cleveland, Ohio 44114

John C. Engle, President
AMP-O, Inc.
Municipal Building
20 High Street
Hamilton, Ohio 45012

Donald H. Hauser, Esq.
Managing Attorney
The Cleveland Electric
Illuminating Company
55 Public Square
Cleveland, Ohio 44101

Leslie Henry, Esq.
Fuller, Henry, Hodge & Snyder
300 Madison Avenue
Toledo, Ohio 43604

Thomas A. Kayuha, Esq.
Ohio Edison Company
47 North Main Street
Akron, Ohio 44303

Thomas J. Munsch, Esq.
General Attorney
Duquesne Light Company
435 Sixth Avenue
Pittsburgh, Pennsylvania 15219

David Olds, Esq.
Reed, Smith, Shaw & McClay
Union Trust Building
Box 2009
Pittsburgh, Pennsylvania 15230

John Lansdale, Esq.
Cox, Langford & Brown
21 Dupont Circle, N.W.
Washington, D. C. 20036

Wallace L. Duncan, Esq.
Jon T. Brown, Esq.
Duncan, Brown & Palmer
1700 Pennsylvania Ave., N.W.
Washington, D. C. 20006

Dwight C. Pettay, Jr.
Assistant Attorney General
Chief, Antitrust Section
30 East Broad Street, 15th Floor
Columbus, Ohio 43215

Deborah Powell Highsmith, Esq.
Assistant Attorney General
Antitrust Section
30 East Broad Street, 15th Floor
Columbus, Ohio 43215

Christopher R. Schraff, Esq.
Assistant Attorney General
Environmental Law Section
361 East Broad Street, 8th Floor
Columbus, Ohio 43215