



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

OFFICE OF
CHIEF COUNSEL

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The Honorable Patrick Toomey
U.S. House of Representatives
Washington, D.C. 20515-1102

Dear Mr. Toomey:

This letter is in response to your inquiry to Commissioner Rossotti dated April 13, 2000, on behalf of the [REDACTED]. You asked us to promptly review the rulings submitted to the Internal Revenue Service by the [REDACTED] in connection with its restructuring of the ownership of its electric generation facilities.

We have a number of cases involving complex issues about the ongoing restructuring of the electric utility industry. These cases present new issues for which determinations must be carefully made. We are working as rapidly as possible to make these determinations and to issue the requested rulings.

I hope this information is helpful. If you have any further questions, please contact me or Peter Friedman at (202) 622-3110.

Sincerely,

CHARLES B. RAMSEY
Chief, Branch 6
Office of Assistant Chief Counsel
Passthroughs and Special Industries