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SYRACUSE UNIVERSITY

December 3, 1973



Daniel M. Head, Esq.  
Atomic Safety & Licensing Board Panel  
U.S. Atomic Energy Commission  
Washington, D. C. 20545

RE: Niagara Mohawk Power Corp. (Nine Mile Point, Unit 2) - AEC Docket  
No. 50-410

Dear Mr. Head:

I write to provide the Board and the other parties with the further specification of our energy conservation contentions which we previously promised to furnish.

The energy conservation alternatives to licensure of Nine Mile Point, Unit 2, which we contend should be considered by the Commission and discussed in the Final Environmental Statement, include:

1. Changes in the rate structure and rates by which electricity is marketed -- e.g.,
  - (a) Abrogating the volume discount (or "declining block rate structures") which Niagara Mohawk utilizes.
  - (b) Increasing the price of electricity to include all of the social (including environmental) costs of its production.
2. Promoting the efficient utilization of electrical energy by:
  - (a) Developing new standards for the more effective insulation of new and old residential and commercial office buildings.
  - (b) Developing new lighting requirements for buildings.
  - (c) Adopting energy efficiency labeling of new appliances and/or developing new standards for appliance efficiency.
  - (d) Restricting the wasteful use of electricity for space heating, air conditioning and inefficient industrial and commercial operations and processes.



3. Implementing measures designed to flatten peak loads, including:
  - (a) time-of-day metering (charging more for electricity used during periods of peak demand.)
  - (b) load staggering.
  - (c) selective load shedding (by class of customer or category of use.)
4. Prohibiting all advertising which promotes the use of electricity directly or indirectly.

Of course, apart from our contentions, there may well be strategies or measures for the conservation of electrical energy that could be implemented in the Niagara Mohawk service area. In our view, NEPA requires their consideration as well.

Very truly yours,

*RS/RG*

Richard I. Goldsmith

RIG/njl

cc: Dr. Marvin M. Mann  
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Secretary, U.S. Atomic Energy Commission



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