

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

NRC PUBLIC DOCUMENT

In the Matter of:)
)
PACIFIC GAS and ELECTRIC COMPANY) Docket No. P-564A
(Stanislaus Nuclear Project,)
Unit No. 1))
_____)



RESPONSE OF NORTHERN CALIFORNIA POWER AGENCY
TO PACIFIC GAS AND ELECTRIC COMPANY'S FIFTH
SET OF INTERROGATORIES TO NORTHERN CALIFORNIA
POWER AGENCY AND DEPARTMENT OF WATER RESOURCES
AND FOURTH SET OF INTERROGATORIES TO THE
CITIES OF ANAHEIM AND RIVERSIDE

Intervenor Northern California Power Agency responds to the fifth set of interrogatories propounded to by Pacific Gas and Electric Company as follows:

PART A

INTERROGATORY NO. 1:

Q. If you or your counsel have interviewed, contacted, corresponded with, inquired of, or retained any person to evaluate evidence or render an opinion on any matter that concerns this litigation, which interview, contact, correspondence, inquiry, or retention was wholly or in part for the purpose of preparing for the hearing of this case, state:

- (a) the name, employer, and address of each person;
- (b) date of first contact;
- (c) whether there exists a contract or agreement for the rendition of such person's services, and, if so, the date and amount of such contract;

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(d) the field of expertise and qualifications of each such person;

(e) the nature of the inquiry made by each such person, the subject investigated by him or her, and the tests conducted by him or her;

(f) the nature and source of any and all physical matter or material received, examined, or tested by each such person, including the identity of each document made available to him or her;

(g) whether any written or oral report has been made by any such person, and, if a report has been made, as to each such report;

(i) the source or author of the report;

(ii) the name and address of each person who has seen or heard the report;

(iii) the name and address of each person having possession of such a report, if it is in writing;

(iv) whether the report was submitted pursuant to employment in an advisory capacity, a prospective witness capacity, or both;

(h) whether you intend to call such person as an expert witness at hearing;

(i) if you have not yet decided whether or not you will call such person as an expert witness at hearing, the date on which you anticipate you will know whether or not you so intend.

A. The information responsive to this interrogatory is contained in the sheets which follow:

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Harvey Hunkins R. W. Beck & Associates 3033 N. Central Avenue Phoenix, Arizona
b. Date of First Contact	June 1979
c. Whether Retained	No
d. Expertise and Qualifications	Electrical engineer and system planner
e. Nature of Inquiry	History of Intertie and Pacific Southwest power development
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Frank Frisk, Suite 301 2600 Virginia Avenue, NW Washington, D.C. 20037
b. Date of First Contact	Mid to late 1960's
c. Whether Retained	No
d. Expertise and Qualifications	Former legislative specialist for American Public Power Association
e. Nature of Inquiry	Legislative history of Intertie, P. L. 55-882
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	Not Applicable
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Phineas Indritz Antioch Law School, Washington, D.C.
b. Date of First Contact	Mid to late 1960's
c. Whether Retained	No
d. Expertise and Qualifications	Former Counsel, House Subcommittee on Oversight and Investigations
e. Nature of Inquiry	Legislative History of CVP and Intertie
f. Nature and Source of material received by Witness	Testimony and pleadings in E-7777 and E-7796. No records kept of individual documents received.
g. Written or Oral Reports by Person	Not Applicable
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	N. B. Bennett, Jr. - Deceased
b. Date of First Contact	Fall 1976
c. Whether Retained	No
d. Expertise and Qualifications	Former Deputy Commissioner of Reclamation
e. Nature of Inquiry	Central Arizona Project
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	Not Applicable
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Richard K. Pelz, Loy Kirkpatrick and Robert Ratcliffe, DOE Attorneys
b. Date of First Contact	Pelz and Kirkpatrick (late 1960's) Ratcliffe (January 1978)
c. Whether Retained	No
d. Expertise and Qualifications	Attorneys on Federal Reclamation Law
e. Nature of Inquiry	Intertie, CVP, Navajo, BPA, other Federal projects.
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	Not Applicable
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Emil V. Lindseth Self-employed 720 Forest Street, Denver, Colorado 80220
b. Date of First Contact	Fall 1976
c. Whether Retained	Yes
d. Expertise and Qualifications	Electrical Engineer Retired USBR Chief Engineer
e. Nature of Inquiry	Intertie History Navajo, Four Corners
f. Nature and Source of material received by Witness	Testimony and pleadings in E-7777(II), E-7796 and Navajo Litigation. No list kept.
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Charles F. Luce, Consolidated Edison Company, New York, NY
b. Date of First Contact	Fall 1977
c. Whether Retained	No
d. Expertise and Qualifications	Utility Chief Executive Former BPA Administrator
e. Nature of Inquiry	Intertie History BPA
f. Nature and Source of material received by Witness	Luce's memorandum to BPA files recording statement (by Robert H. Gerdes) of PG&E's ability to deny SMUD access to Pacific Northwest power.
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	H. P. Dugan, Self Employed 3541 Montclair Road Shingle Spring, CA 95682
b. Date of First Contact	Spring 1979
c. Whether Retained	Yes
d. Expertise and Qualifications	Reclamation Project Planning and Operation. Former USBR Regional Director
e. Nature of Inquiry	Contract 2948A negotiations
f. Nature and Source of material received by Witness	Contract 2948A and its immediate predecessors, Contract 2947A, Cottonwood Interconnection Agreements, and testimony of Messrs. Kuder, Head, Daines and perhaps others.
g. Written or Oral Reports by Person	Filed as testimony in FERC Docket Nos. E-7777(II) and E-7796.
i. Source and Author	H. P. Dugan
ii. Persons who received Reports	Unknown in entirety
iii. Persons Possessing Reports	Unknown in entirety
iv. Capacity in which Reports submitted	Expert and percipient witness
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Robert H. Hartley R. W. Beck and Associates 3033 N. Central Avenue Phoenix, Arizona 85012
b. Date of First Contact	1976
c. Whether Retained	Not for this case
d. Expertise and Qualifications	Electric System Planner
e. Nature of Inquiry	System Planning in WSCC Formerly of Arizona Public Service Company.
f. Nature and Source of material received by Witness	To extent this is known, the documents were furnished as Mr. Hartley's work papers in FERC Docket No. ER 76-532.
g. Written or Oral Reports by Person	Testimony in FERC Docket No. ER 76-532
i. Source and Author	Robert H. Hartley
ii. Persons who received Reports	Unknown in toto
iii. Persons Possessing Reports	Unknown in toto
iv. Capacity in which Reports submitted	Expert and percipient witness
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Eldon Jones Tri-State Generation & Transmission Association, Thornton, Colorado
b. Date of First Contact	July 1978
c. Whether Retained	No
d. Expertise and Qualifications	Former Intertie scheduler for Edison
e. Nature of Inquiry	Intertie Operation
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Robert Olson, Richard Brown Harold Hood, Marlene Moody Western Area Power Administration Boulder City, Nevada
b. Date of First Contact	December 1976
c. Whether Retained	No
d. Expertise and Qualifications	Design, Planning and/or Operation of Colorado River Storage Project, Parker-Davis, Hoover, Intertis and Central Arizona Project
e. Nature of Inquiry	Same
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	L. Chet Grimes, John Anderson Ronald Greenhalgh, Don Tribble Gordon Estes, Richard Klinke Western Area Power Administration 2800 Cottage Way Sacramento, California
b. Date of First Contact	1976
c. Whether Retained	No
d. Expertise and Qualifications	Planning, design and operation of CVP and the Intertie
e. Nature of Inquiry	Planning, design and operation of CVP and the Intertie
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None - extensive relevant testimony and data has been received from some of these gentlemen which has already been furnished to PGandE
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Larry Dean, Robert Griffin Douglas Dawson, Robert Eastvedt Hector Durocher, William Mittelstadt, Edward Weitzel, John Vithayathil, Kenneth Earl, "Bud" Larsen Bonneville Power Administration Portland, Oregon
b. Date of First Contact	January 1978
c. Whether Retained	No
d. Expertise and Qualifications	Operations, planning and design of the Intertie and BPA system
e. Nature of Inquiry	Operations
f. Nature and Source of material received by Witness	Mr. Dawson reviewed Mr. Castle Bradeen's (R.W. Beck employee) work papers and testimony of W. A. Russell filed in E-7796 in August 1978.
g. Written or Oral Reports by Person	Testimony by Douglas Dawson in FERC Docket No. E-7777(II) and E-7796.
i. Source and Author	Douglas Dawson
ii. Persons who received Reports	Unknown
iii. Persons Possessing Reports	Unknown
iv. Capacity in which Reports submitted	Expert and Percipient witness on BPA Joint Schedulers Office
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

- | | | | |
|----|---|--|--|
| a. | Name, Employer and Address | R. W. Beck and Associates -
(excluding R. H. Hartley, H.
Hunkins, Norman A. Hill, Herbert C.
Westfall.) | |
| b. | Date of First Contact | Mid to late 1960's | |
| c. | Whether Retained | Yes. A general contract amended from
time to time covers R.W. Beck's work in
This and other proceedings. It would b
impossible to dissegregate the time and
budget devoted to this proceeding. | |
| d. | Expertise and Qualifications | Engineering Consultants | |
| e. | Nature of Inquiry | All facets of power supply | |
| f. | Nature and Source of material received by Witness | No records kept | |
| g. | Written or Oral Reports by Person | See Discovery in E-7777(II),
E-7796 | |
| | i. | Source and Author | Various employees of R. W. Beck |
| | ii. | Persons who received Reports | NCPA, Southern Cities, their Counsel
PGandE, Edison and perhaps others. |
| | iii. | Persons Possessing Reports | Unknown in entirety |
| | iv. | Capacity in which Reports submitted | Consultants or Expert Witnesses |
| h. | Whether intended as a witness | Unknown | |
| i. | When status as witness to be determined | Unknown | |

ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Richard Klinke Western Area Power Administration 2800 Cottage Way Sacramento, California
b. Date of First Contact	Summer 1979
c. Whether Retained	No
d. Expertise and Qualifications	Transmission Planning Engineer
e. Nature of Inquiry	Contract 2948A, especially USBR Transmission Losses and effect upon PDC
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	John Dawson Vero Beach, Florida
b. Date of First Contact	August, 1977
c. Whether Retained	No
d. Expertise and Qualifications	Bond Counsel
e. Nature of Inquiry	Formation and financing of public utility districts in Pacific Northwest.
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

<u>INTERROGATORY SECTION</u>	
a. Name, Employer and Address	Merrill Schultz Northwest Power Pool (NWPP)
b. Date of First Contact	Summer 1978
c. Whether Retained	No
d. Expertise and Qualifications	NWPP Chief Executive
e. Nature of Inquiry	Hydro-thermal coordination in Pacific Northwest and NWPP functions.
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and address	Milton Chase Rural Electric Cooperative Finance Corporation, Washington, D.C.
b. Date of First Contact	1968
c. Whether Retained	No
d. Expertise and Qualifications	Engineer
e. Nature of Inquiry	Negotiation of Intertie Arrangements
f. Nature and Source of material received by Witness	No records kept
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a.	Name, Employer and address	Morgan Dubrow National Rural Electric Cooperative Association, Washington, D.C.
b.	Date of First Contact	Fall of 1977
c.	Whether Retained	No
d.	Expertise and Qualifications	Engineer
e.	Nature of Inquiry	Contract 2948A, its origin and intent
f.	Nature and Source of material received by Witness	None
g.	Written or Oral Reports by Person	None
	i. Source and Author	
	ii. Persons who received Reports	
	iii. Persons Possessing Reports	
	iv. Capacity in which Reports submitted	
h.	Whether intended as a witness	Unknown
i.	When status as witness to be determined	Unknown

ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Richard Nassief Northwest Power Pool (NWPP)
b. Date of First Contact	Summer 1978
c. Whether Retained	No.
d. Expertise and Qualifications	Utility System Operator (Formerly Edison)
e. Nature of Inquiry	None
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	G. J. Whittlinger Anza Electric Cooperative Anza, California
b. Date of First Contact	1979
c. Whether Retained	No
d. Expertise and Qualifications	Chief executive of REA Cooperative
e. Nature of Inquiry	Status of Anza's system generating capability in 1967
f. Nature and Source of material received by Witness	Letter stating "Nature of Inquiry."
g. Written or Oral Reports by Person	None
i. Source and Author	
ii. Persons who received Reports	
iii. Persons Possessing Reports	
iv. Capacity in which Reports submitted	
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PGandE's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	Whitfield A. Russell Whitfield A. Russell & Associates, P.C. Suite 304 2600 Virginia Avenue, N.W. Washington, D.C. 20037
b. Date of First Contact	March, 1976
c. Whether Retained	Yes. Retained through counsel to NCPA by oral contract with no contract amount specified.
d. Expertise and Qualifications	Power supply planning, economics, operations, contracting and general engineering.
e. Nature of Inquiry	Request for analysis of existing contractual arrangements.
f. Nature and Source of Material Received by Witness	Discovery documents, pleadings and testimony in PG&E litigation. See answers to PG&E interrogatories and workpaper requests in E-7777(II).
g. Written or Oral Reports by Person	Testimony in FERC Docket Nos. ER76-532, E-7777 (II) and E-7796.
i. Source and Author	Whitfield A. Russell
ii. Persons who received reports	Persons on service list in referenced dockets; unknown in entirety.
iii. Persons Possessing Reports	Persons on service list in referenced dockets; unknown in entirety.
iv. Capacity in which Reports submitted	Expert
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PGandE's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

- | | | | |
|----|---|---|---|
| a. | Name, Employer and Address | Ralph E. Miller
J. W. Wilson and Associates
1010 Wisconsin Avenue, N.W.
Washington, D.C. 20007 | |
| b. | Date of First Contact | Mid to late 1970's | |
| c. | Whether Retained | Yes. \$50,000 contract ceiling.
Contract dated December, 1977. | |
| d. | Expertise and Qualifications | Economist | |
| e. | Nature of Inquiry | Market structure, institu-
tional arrangements and
barriers to entry in electric
utility industry | |
| f. | Nature and Source of Material Received by Witness | Discovery, pleadings and
testimony in this proceeding
and PERC Docket Nos. E-7796
and E-7777 (II) and Projects
2735 and 1988. | |
| g. | Written or Oral Reports by Person | Testimony in E-7777 (II) and
E-7796 | |
| | i. | Source and Author | Ralph E. Miller |
| | ii. | Persons who received reports | Service list in referenced
dockets. Unknown in entirety. |
| | iii. | Persons Possessing Reports | Unknown in entirety. |
| | iv. | Capacity in which Reports submitted | Expert in economics |
| h. | Whether intended as a witness | Unknown | |
| i. | When status as witness to be determined | Unknown | |

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ANSWERS TO INTERROGATORY NO. 1

PGandE's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

a. Name, Employer and Address	William E. Warne 2090 Eighth Avenue Sacramento, California 95818
b. Date of First Contact	April, 1979
c. Whether Retained	No.
d. Expertise and Qualifications	Reclamation expert, former Director of DWR, former senior official of Bureau of Reclamation
e. Nature of Inquiry	DWR relationship to California Power Pool and Intertie
f. Nature and Source of material received by Witness	Testimony and pleadings in FERC Docket Nos. E-7777 (II) and E-7796
g. Written or Oral Reports by Person	None
i. Source and Author	None
ii. Persons who received reports	None
iii. Persons Possessing Reports	None
iv. Capacity in which Reports submitted	None
h. Whether intended as a witness	Unknown
i. When status as witness to be determined	Unknown

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ANSWERS TO INTERROGATORY NO. 1

PGandE's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

- | | |
|--|---|
| a. Name, Employer and Address | Herbert C. Westfall
200 Tower Building
Seattle, Washington 98101 |
| b. Date of First Contact | In the early 1960's began association with NCPA predecessors. Began work related to this proceeding when discovery began. |
| c. Whether Retained | Yes. |
| d. Expertise and Qualifications | Power supply planning, economics, operations, contracting and general engineering. |
| e. Nature of Inquiry | |
| f. Nature and Source of Material Received by Witness | Discovery in this and related proceedings; pleadings and testimony in FERC Docket Nos. E-7777 (II) and E-7796 |
| g. Written or Oral Reports by Person | Testimony in FERC Docket Nos. E-7777 (II) and E-7796. |
| i. Source and Author | Herbert C. Westfall |
| ii. Persons who received reports | Service list in referenced dockets. Unknown in entirety. |
| iii. Persons Possessing Reports | Unknown in entirety. |
| iv. Capacity in which Reports submitted | Expert and percipient witness |
| h. Whether intended as a witness | Unknown |
| i. When status as witness to be determined | Unknown |

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ANSWERS TO INTERROGATORY NO. 1

PGandE's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

- | | |
|--|---|
| a. Name, Employer and Address | Norman A. Hill
R. W. Beck and Associates
1851 Heritage Lane
Sacramento, California 95815 |
| b. Date of First Contact | Early in 1970's. |
| c. Whether Retained | Yes. |
| d. Expertise and Qualifications | Power supply planning, economics, operations, contracting and general engineering. |
| e. Nature of Inquiry | Testimony on NCPA relationship with PG&E, CVP and other entities. |
| f. Nature and Source of Material Received by Witness | PGandE discovery materials, pleadings and testimony in FERC Docket Nos. E-7777 (II) and E-7796. |
| g. Written or Oral Reports by Person | Testimony in FERC Docket Nos. E-7777 (II) and E-7796. |
| i. Source and Author | Norman A. Hill |
| ii. Persons who received reports | All on service lists in referenced dockets; unknown in entirety. |
| iii. Persons Possessing Reports | All on service lists in referenced dockets; unknown in entirety. |
| iv. Capacity in which Reports submitted | Expert and percipient witness to negotiations. |
| h. Whether intended as a witness | Unknown |
| i. When status as witness to be determined | Unknown |

INTERROGATORY NO. 2:

Q. Please describe all transmission facilities which you own or control, in whole or in part, which have a capacity at 60 kilovolts or above. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. The capacity of NCPA or other transmission lines is not stated in kilovolts. NCPA does not own any transmission lines whether operated above or below 60 kilovolts. The characteristics of transmission lines of each NCPA member are described in the Forms 1M (page 21) and Forms 12 filed annually by each such entity at the Federal Energy Regulatory Commission.

NCPA's associate member, Plumas-Sierra Rural Electric Cooperative, owns 110.367 miles of 69,000 volt transmission lines which extend from the point of interconnection with PGandE at East Quincy to a point near Chilcoot paralleling Highway 70 and from Beckwourth over the mountains to Milford and from that point along Highway 395 to the Leavitt Substation, as well as a line from Beckwourth to Sierraville.

INTERROGATORY NO. 3:

Q. Please describe all transmission facilities which you plan to construct or otherwise acquire, in whole or in part, which have a capacity at 60 kilovolts or above. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

INTERROGATORY NO. 3:

A. Information responsive to this interrogatory is contained in the documents listed in answer to Interrogatory No. 2 and the April 1, 1979 response of WSCC to FERC Orders in Docket No. R-362, and the Notice of Intention for NCPA Geothermal Project No. 2, each of which is a public document or a document previously provided by NCPA to PGandE. Plumas-Sierra Rural Electric Cooperative intends to construct a line from Chilcoot east to Long Valley Creek, then north to Milford.

INTERROGATORY NO. 4:

Q. Have you ever considered or studied the possible construction or acquisition, in whole or in part, of any transmission facilities having a capacity at 60 kilovolts or above. If so, please state:

(a) a general description of the transmission facilities which were considered or studied;

(b) the time period during which this consideration or study was made;

(c) the dates of any meetings at which such consideration or study was discussed, and the names of all individuals who attended such meeting;

(d) the identification, name and current business or residence address of each person who participated in such consideration or study;

(e) the result of the study;

(f) the identification of every document containing or commenting upon the study or the minutes of any meeting identified in subpart (c), above. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. Yes. The facilities considered by NCPA and its members are described in the February 1968 (NCPA Document No. 000254), September 1968, April 1972 and 1979 (see Volume 2 of NCPA's Notice of Intention on Geothermal Project No. 2) studies conducted for NCPA by R. W. Beck and Associates, the June 30, 1970 study by Milton Chase (PGandE Discovery Document No. ZWA 082149-082154), and the workpapers of W. A. Russell in FERC Docket Nos. ER 76-532, E-7796 and E-7777(II). Also, please see the May 6, 1968 study for Santa Clara by R. W. Beck (PGandE Discovery Document No. ZLF 075624-075629). These and other responsive documents were made available by NCPA to PGandE and many of these are PGandE documents. Substantial documentation of NCPA's consideration of such facilities and plans are also in PGandE's possession.

INTERROGATORY NO. 5:

Q. Please identify every bond issue which you have had outstanding as of June 30 (or the end of your fiscal year) in every year since 1960, including the principal amount of the original issue, the interest rate, any discounts or premiums applicable, the rate and method of retirement of the issue and the type of bond (e.g., general obligation bond). (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. NCPA has, and has had, no bond issues outstanding, since it has, until now, been unable to construct any facilities as a result of PGandE's policies at issue here.

NCPA objects to this interrogatory insofar as it seeks information from individual NCPA members.

INTERROGATORY NO. 6:

Q. For each year from 1960 to the present, please state the amount of bonding capacity which you had which could have been used for the construction or acquisition of transmission facilities having a capacity at 60 kilovolts or above. If you were subject to no specific limit, please indicate your best estimate of the amount of bonds which you could have reasonably issued for such purpose assuming any need legislative or voter approval. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

INTERROGATORY NO. 6:

A. NCPA is not subject to a specific dollar limit in the amount of bonding capacity which could have been used for the construction or acquisition of transmission facilities operated at 60 kilovolts or above. NCPA has not estimated the amount of bonds which could reasonably have been issued for such purpose assuming any needed legislative or voter approval.

INTERROGATORY NO. 7:

Q. For each year from 1960 to the present, please state all sources of funding other than bonded indebtedness which are available to you for the purpose of constructing or acquiring transmission facilities having a capacity at 60 kilovolts or above. Please include in your answer any funding sources which were contingent on the approval of some legislative or other body, including the voters, and, as to such funding sources, indicate the identity of the group whose approval was required and the type of majority which would be necessary (e.g., majority of State legislature, two-thirds of the persons voting in municipal election). (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. (NCPA has requested additional time to respond to this interrogatory.)

INTERROGATORY NO. 8:

Q. Please describe each effort made by you (and, in the case of NCPA, each of its members and associate members) during the period 1960 to the present to utilize any of the funding sources identified in response to the preceding two interrogatories for the purpose of constructing or acquiring all or a portion of transmission facilities having a capacity at 60 kilovolts or above. Please include in your description the following information as to each such effort:

(a) the time period during which the effort was made;

(b) the nature and location of the transmission facilities under construction;

(c) an identification of all documents reflecting the consideration including, without limitation, any reports or requests made to your governing body;

(d) the identity of every individual who participated in such consideration;

(e) the result of such consideration and the reasons therefor.

A. (NCPA has requested additional time to respond to this interrogatory.)

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INTERROGATORY NO. 9:

Q. Please identify every occasion on which you have sought from your governing body the authority to construct or acquire all or a portion of any transmission facility having a capacity at 60 kilovolts or above and, for each such effort, please state:

(a) the time period during which such effort was made

(b) the nature and location of the transmission facility under consideration;

(c) an identification of all documents reflecting the consideration including, without limitation, any reports or requests made to your governing body;

(d) the identity of every individual who participated in such consideration;

(e) the names of those members of the governing body who supported the request and the names of those members of the governing body who opposed it and, for each member, the reason for their support or opposition.

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NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members. For purposes of this interrogatory, the term "governing body" means, as to the Cities of Anaheim and Riverside and the City members of NCPA, their respective City councils, and as to others it means the body having power to grant the authority.

A. (NCPA has requested additional time to respond to this interrogatory.)

INTERROGATORY NO. 10

Q. Please describe all electrical generating capacity which you own or control, in whole or in part. (NCPA should answer this Interrogatory separately for NCPA and for each of its members and associate members.).

A. As a result of PGandE policies at issue in this proceeding, NCPA neither owns nor controls, in whole or in part, electrical generating capacity.

INTERROGATORY NO. 11

Q. Please describe electrical generating capacity which you plan to construct or otherwise acquire, in whole or in part, (NCPA should answer this interrogatory for NCPA and for each of its members and associate members.)

A. The plans of NCPA to construct generating capacity are contained in a report by Burns and McDonnell which has been previously furnished to PGandE. Some geothermal plans described by Burns and McDonnell are also the subject of a Notice of Intention with respect to NCPA Geothermal Project

No. 2 (Two Volumes) which contains results of recent NCPA studies. In addition, NCPA has plans to develop the Calaveras County hydroelectric project and Geothermal Project No. 1. These plans are also described in documents previously furnished to PGandE.

The City of Santa Clara is independently pursuing a license for the Mokelumne Project, for which PGandE has had a license that expired. This is the subject of a generic proceeding before FERC, and PGandE has been furnished copies of documents relating to this project which include the requested descriptions. NCPA is also considering participation in PGandE's proposed coal plant and Stanislaus Nuclear Project No. 1 and has considered participation in SMUD's Rancho Seco No. 2, the San Joaquin Project, the Mendocino Project, Canadian Entitlement Power and other Northwest power.

The City of Santa Clara is planning a cogeneration facility.

The City of Redding is planning three hydroelectric facilities. The 14 Mw Lake Redding Project is scheduled for service in 1984. This facility has been the subject of a meeting with Messrs. Jack LaRue, Stuart Svensson, Don Thomason and Glenn West, Jr. of PGandE. The 4 Mw Whiskeytown Project and the 14 Mw Red Bluff Diversion Dam Projects are awaiting FERC action.

The City of Alameda is planning a generating project to be fueled by solid wastes. It is a 42 Mw project scheduled for initial service at or after mid-1983. Exact siting and other attributes have not been decided on.

INTERROGATORY No. 12.

Q. Have you ever considered or studied the possible construction or acquisition, in whole or in part, of any electrical generating capacity? If so, please state:

(a) a general description of the electrical generating capacity which was considered or studied;

(b) the time period during which this consideration or study was made;

(c) the dates of any meetings which this consideration or study was discussed, and the names of all individuals who attended each such meeting;

(d) the identification, name and current business or residence address of each person who participated in such consideration or study;

(e) the result of the study;

(f) the identification of every document containing or commenting upon the study or the minutes of any meeting identified in subpart (c), above. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. Yes. The information responsive to this interrogatory can be found in answers to (and the documents referred to in answer to) Interrogatory No. 4 and Interrogatory No.

11. The following documents also deal with NCPA's attempt to develop geothermal generation:

<u>DOCUMENT NO.</u>	<u>DATE</u>
AXE 170442	1-18-73
AXE 170457	4-8-73
AXE 172847-50	4-4-72
AXF 124750	5-28-70
AXF 124977	2-9-70
BXA 222767-222768	6-14-72
Illegible	6-4-73
Illegible	12-11-72 (Re: Nov. 29, 72 meeting)
IXA 123767	8-22-72
ZAB 238448-238452	11-8-72
ZAB 239772	1-21-72
ZAB 239772	1-21-72
ZAB 239860-239864	6-2-69
ZAB 370954	10-4-68
ZAB 371758	5-18-67
ZAB 375831-375835	6-11-69
ZAB 376496	9-24-73
ZBA 083975	
ZBA 083975	3-4-70
ZLE 298169	3-28-73
ZLE 298174	10-11-72
ZLE 298256	11-21-72
ZLE 298257	
ZLE 298329	
ZLE 298329	
ZLF 075621-075662	4-17-68
ZLF 075624-075629	10-17-68
ZLF 075644-075648	10-2-68
ZLF 291508	1-3-70 (9-4-69)(9-22-69)(9-23-69)
ZLG 243518	11-20-72
ZLG 243880	8-14-72
ZLG 243901	5-13-72
ZLG 243901	5-13-72
ZLG 243920	11-14-72

ZLG	243933-243937	3-18-72
ZLG	244320-244321	8-15-72
ZLG	300400	4-6-72
ZLG	300440	4-6-72
ZLG	244194-244202	10-30-72
ZLH	102706	1-22-73
ZLH	102806	12-6-72
ZLH	102830	11-8-72
ZLH	102946	
ZLH	102961	
ZLH	109336	8-18-72
ZLH	182811	11-14-72
ZLI	075624	
ZMA	272901-272908	11-22-68
ZWA	082149-082154	7-24-70

INTERROGATORY NO. 13:

Q. For each year from 1960 to the present, please state the amount of bonding capacity which you had which could have been used for the construction or acquisition of electrical generating capacity. If you were subject to no specific limit, please indicate your best estimate of the amount of bonds which you could have reasonably issued for such purpose assuming any needed legislative or voter approval. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. See answer to Interrogatory No. 6.

INTERROGATORY NO. 14:

Q. For each year from 1960 to the present, please state all sources of funding other than bonded indebtedness which were available to you for the purpose of constructing or acquiring electrical generating capacity. Please include in your answer any funding sources which were contingent on the approval of some legislative or other body, including the voters and, as to such funding sources, indicate the identity of the group whose approval was required and the type of majority which would be necessary (e.g., majority of State legislature, two-thirds of the persons voting in a municipal election). (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. (NCPA has requested additional time to respond to this interrogatory.)

INTERROGATORY NO. 15:

Q. Please describe each effort made by you (and, in the case of NCPA, each of its members and associate members) during the period 1960 to the present to utilize any of the funding sources identified in response to the preceding two interrogatories for the purpose of constructing or acquiring electrical generating capacity. Please include in your answer description the following information as to each such effort:

(a) the time period during which the effort was made;

(b) the nature and location of the generating facility under consideration;

(c) an identification of all documents reflecting the consideration including, without limitation, any reports or requests made to your governing body;

(d) the identity of every individual who participated in such consideration;

(e) the result of such consideration and the reasons therefor.

A. (NCPA has requested additional time to respond to this interrogatory.)

INTERROGATORY NO. 16:

Q. Please identify every occasion on which you have sought from your governing body the authority to construct or acquire all or a portion of any electrical generating capacity and, for each such effort, please state:

(a) the time period during which such effort was made;

(b) the nature and location of the generating facility under consideration;

(c) an identification of all documents reflecting the consideration including, without limitation, any reports or requests made to your governing body;

(d) the identity of every individual who participated in such consideration;

(e) the names of those members of the governing body who supported the request and the names of those members of the governing body who opposed it and, for each member, the reasons for their support or opposition.

NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members. For purpose of this interrogatory, the term "governing body" means, as to the Cities of Anaheim and Riverside and the city members of NCPA, their respective City Councils, and as to others it means the body having power to grant the authority.

A. (NCPA has requested additional time to respond to this interrogatory.)

INTERROGATORY NO. 17:

Q. Please identify every request made by you or on your behalf to PGandE during the period 1960 to the present to wheel power to or from you, which request was denied by PGandE. Include in your identification the identity of the other entity to whom or from whom the power was to be wheeled, the amount of power involved, the duration of the wheeling service requested, the type of power exchange which was contemplated, your understanding of the reason the request was denied, and the identity of all persons known to you to be involved in the request or denial and all documents containing the request or denial. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. NCPA has objected to this interrogatory as improperly requiring document production beyond the "one massive sweep" ordered by the Board and as duplicative of Interrogatories 45-52 of PGandE's Fourth Set of Interrogatories in this proceeding. Nevertheless, NCPA provides the following examples of requests and refusals responsive to this interrogatory.

The requests for PGandE to wheel power from CVP to individual members of what later became NCPA commenced as early as the 1940's. For example, PGandE document ZBA 414724 dated November 1945 states that Alameda, Biggs, Gridley, Healdsburg, Palo Alto, Redding, Roseville, Santa Clara, the Shasta Dam Area PUD and Truckee PUD requested wheeling service from PGandE in order to receive power from CVP. See page 9 of the referenced document. The memorandum notes that PGandE refused wheeling to Roseville and opposed line construction. The Cities of Lodi, Alameda and Healdsburg and Truckee PUD do not receive service from CVP.

On January 12, 1973 Mr. Kuder of PGandE refused to wheel from the geothermal units of NCPA to the delivery points of NCPA members (this is document No. ZWH 067575-6), because of a purported lack of transmission capacity when the Cottonwood interconnection was opened. Mr. Perry of PGandE later testified that construction of the Intertie created excess transmission capacity in PGandE's 230 KV network. (FERC Docket No. ER 76-532, transcript pp. 561-62, 596-97.)

See the December 13, 1972 draft refusal dictated by Tom Crampton to Norman Ingraham ZAB 239519-20.

A May 13, 1970 PGandE memorandum from Albert B. Cook to Mr. R. H. Peterson stated that in 1962, in anticipation of additional power allocations that would be made available by the Bureau upon activation of Trinity Division Units of the Central Valley Project, a multiplicity of requests for transmission service was received. Included were requests

from 23 potential preference customers -Federal, State, and Municipal, including NCPA members -whose loads were all outside the geographical limits of transmission service under contract I-75r-2650 (one of the predecessor contracts to Contract 2948A). Most, if not all, were refused.

See the March 11, 1970 document from the Office of the President -Vice President - Fiscal Planning and Construction (Document No. ZAL-204358-204361) concerning the cost of utilities to the Berkeley Campus of the University of California. This document describes the numerous attempts of the University of California to obtain CVP power and transmission. Santa Clara and DWR were potential joint venturers of the University. PGandE document No. ZWA 51102.

A meeting held on August 18, 1969 between representatives of PGandE and NCPA is described in document ZLG 243984-243991. At page 3, Mr. Gerdes, was reported to have refused to wheel power to NCPA from recaptured hydro plants. At page 4, Mr. Gerdes was reported to have stated that he did not believe that the Company should wheel or support power generated by NCPA during the interim from 1971 to 1980. He also was reported to have stated that he would not wheel from a project to NCPA unless PGandE believed that the project would be more cost effective than would purchasing power from PGandE. When asked why PGandE would not integrate with NCPA's system as the Company had done with CVP, Mr. Gerdes

was reported to have stated that the Bureau of Reclamation was in a position to build Federal lines which would have duplicated those of the Company. He was reported to have stated that PGandE coordinated the CVP power operations with its own in order to avoid further encroachment of Federal transmission lines in PGandE's service area. (See page 7). At page 7, Mr. Gerdes was reported to have stated that if the Company did not believe that an NCPA proposal would be economic, the Company would refuse to wheel.

PGandE never subsequently determined any proposed NCPA project to be economic. NCPA's January 16, 1978 answer to PGandE interrogatory No. 127 in FERC Docket No. E-7777 (II) also addresses this issue. It is included here for your convenience.

"Interrogatory No. 127. Do you contend that PGandE denied requests to expand the wheeling area that is specified in Contract 2948A? If so, please state your contention.

ANSWER: Yes. See the following document numbers.

NCPA 3675
NCPA 3673
NCPA 8004, 8005
PG&E 006663
NCPA 8009-10
NCPA 8012
NCPA 3107-08
NCPA 17542-49
PG&E 6663
PG&E 6664
PG&E 138758-59
PG&E ZWF 355135-36
PG&E 141270-71
PG&E 006653-58
PG&E 283435-38
PG&E 283459-60

1 351

PG&E 283461-62
PG&E 283463-64
PG&E 283465-66
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PG&E 283425-26
PG&E 283427-28
PG&E 283429-50
PG&E 283406-07
PG&E 283409-10
PG&E 283412-13
PG&E 283415-15A
PG&E 283419-19A
PG&E 283441-42
PG&E 283443-444
PG&E 283445-445A
PG&E 283446-447
PG&E 283448-449
PG&E 283450-51
PG&E 283452-53
PG&E 283554-55
PG&E 283556-57
PG&E 283558-58A
PG&E 283401-402
PG&E 398056-58
PG&E 130921-23
PG&E 130916-17 "

Also see the August 18, 1967 letter from J. G. Foster, Manager of PG&E's North Bay Division to Mr. Lyell C. Cash, City Manager of the City of Ukiah. Mr. Foster declined to expand the existing boundaries of the wheeling area defined in Contract 2948A so as to enable CVP to serve Ukiah. See document No. ZAB 377030.

NCPA's recent attempts to obtain power from Georgia-Pacific at its Fort Bragg plant were unsuccessful because of PGandE's refusal to wheel.

In addition, a number of exhibits to the testimony of Whitfield A. Russell in E-7777 and E-7796 document PGandE's refusals to expand the CVP wheeling area, to wheel for customers not meeting the requirements of Contract 2948A for preference customer service, to provide wheeling of power received from a Federal Intertie, and to wheel Northwest power to a nongenerating public entity located in California. This issue has been addressed repeatedly by NCPA in answers to interrogatories, direct testimony and cross-examination in FERC Docket Nos. E-7777(II) and E-7796.

INTERROGATORY 18:

Q. Please identify every agreement or understanding, formal or informal, oral or written, between you and any other entity excepting PGandE which relates in any way to the construction or acquisition of electrical transmission or generation facilities or capacity. For the purpose of this interrogatory, the term "you" refers to each of the intervenors separately and, as to NCPA, it refers both to NCPA and to each of NCPA's members and associate members separately so that an agreement between two members cities of NCPA should be identified in response to this interrogatory.

A. Objection: Overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 19:

Q. Is there today, or has there been at any time since 1960, any understanding, agreement or contract between you and any other person, municipality, corporation, or other entity, in which you have agreed not to compete with some person or entity in the acquisition or installation of electrical power generating facilities or the acquisition of bulk power supplies from any source? (NCPA should answer this interrogatory and interrogatories B, C and D below separately for NCPA and for each of its members and associate members).

(a) Is the understanding, agreement or contract written or oral.

(b) When was the understanding, agreement or contract reached or executed or otherwise become effective.

(c) Who are the other individuals, persons or entities with whom the understanding, agreement or contract exists.

(d) Describe, in detail, the terms of said understanding, agreement or contract.

A. (NCPA has requested additional time to respond to this interrogatory.)

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INTERROGATORY NO. 20:

Q. State separately in full the method by which you forecast your own load, generation requirements, purchased power requirements, transmission requirements and the demand for electric energy outside your own load which you believe you could compete with PGandE or others to supply.

A. It is presently impossible for NCPA and its members to forecast resource requirements, because such forecasts will depend upon establishing an acceptable agreement with PG&E for determining reserve requirements. This has not been possible to date, because PG&E has insisted that only it should receive reserve credit for 600 "phantom" megawatts allegedly received by virtue of interconnections with others outside PG&E's control area.

The reports to NCPA discussed in answer to Interrogatories 4, 11, and 12 of necessity required that NCPA individual member demands and energy requirements and those for NCPA in the aggregate be forecast. Except insofar as the methodology is set forth on the face of those reports, NCPA could establish what methodology was used only by undertaking substantial research. It is NCPA's understanding that the

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forecasts of NCPA generation requirements, purchased power requirements and transmission requirements are all based upon an extrapolation of a least-squares curve fitted to historical data.

It is the intent of NCPA to establish in the future a common data base for individual NCPA members and NCPA in the aggregate and a forecast methodology for determining future demands and energy requirements of individual NCPA members and NCPA in the aggregate. This methodology is intended to take account of all factors which substantially affect the growth in energy use and demand of NCPA including demographics, economic conditions and weather variations. This new methodology and the forecast to be derived by use of that methodology are intended to form the basis for NCPA's bulk power supply planning and its reporting to the FERC and the California ERCDC.

INTERROGATORY NO. 21

Q. For each year from 1980 to the latest year for which you have an estimate, state your best estimate of the amount of energy you expect to provide to energy users other than yourself, your best estimate of the price you will charge for such energy, or the basis on which you expect to determine such price.

A. Estimates of the amount of energy to be provided to others are impossible to determine for the reasons explained in answer to the previous interrogatories. Except insofar as estimates of the amounts of energy NCPA will provide to

users other than NCPA appear on the face of studies described in answers to Interrogatory 4, 11 and 12, NCPA has no such estimates.

NCPA has no estimate of the price it would charge for such energy, because NCPA has been unable to reach the necessary agreements to permit NCPA to sell energy to others, which agreement will affect the terms, conditions and prices of such sales.

INTERROGATORY NO. 22:

Q. Please state whether you (and, as to NCPA, any of NCPA's members or associate members) are presently precluded by any provision of law, or your own internal policy or other provision from becoming a signatory to the California Power Pool Agreement. If so, please identify the provision or policy.

A. Although NCPA believes that the California Power Pool Agreement, as currently drafted and applied, is in violation of the antitrust laws of the United States (and possibly the State of California), NCPA is not presently aware of any other provision of law or internal policy which directly precludes NCPA or its members from becoming a signatory to the California Power Pool Agreement. Of course, NCPA could not become a signatory to the California Power Pool Agreement as presently drafted without risking consequences under the Bankruptcy Act.

INTERROGATORY NO. 23:

Q. Please state all facts of which you are aware which indicate to you that PGandE has refused on any occasion to sell power at wholesale or to provide any other electrical service for the purpose of preventing a takeover of retail facilities by a municipality or other governmental agency.

A. NCPA objects to this Interrogatory as premature. However, as examples of refusals responsive to this interrogatory, NCPA provides the following information.

PGandE has refused on numerous occasions to sell power at wholesale and/or provide other electrical services for the purpose of preventing takeovers of PGandE's retail facilities by municipalities or other governmental agencies. NCPA has documented such refusals in the testimony filed in FERC Docket Nos. E-7777 (II), E-7796, and the Helms Creek Pumped Storage Proceeding (FERC Project Nos. 2735 and 1988), and in the pleadings before the NRC concerning the Mendocino, Stanislaus and San Joaquin Projects.

PGandE's refusals to provide electrical services for the purpose of preventing takeovers of its facilities have been manifested in numerous ways. The types of electrical services which PGandE has refused to render (excluding wholesale power) are interconnections, including interconnections at voltages higher than distribution voltages, interconnections for purposes of wheeling outside a prescribed area under

Contract 2948A and its predecessor contracts, interconnections with a Federal Intertie, interconnections to any entity which connected to a Federal Intertie, interconnections to a proposed d.c. transmission line to terminate in the PGandE Area System, standby services, backup services, wheeling services, provision of firming energy for hydroelectric resources, services to support CVP sales at levels in excess of specified megawatt levels, services which would allow CVP to sell capacity and energy separately (see Article 14 of Contract 2948A), services which would allow public agencies to participate in the California Power Pool Agreement, and services to allow public agencies to use and obtain capacity and energy over the Pacific Intertie.

These matters were the subject of numerous interrogatories answered by Whitfield A. Russell under cover letter of February 5, 1979 in FERC Docket No. E-7777(II) and E-7796. You are specifically referred to answer Nos. 4, 7, 11, 20, 23, 27, 28, 29, 34, 37, 39, 41, 42, 46, 50, 55, 62, 64, 65, 69, 71, and 72.

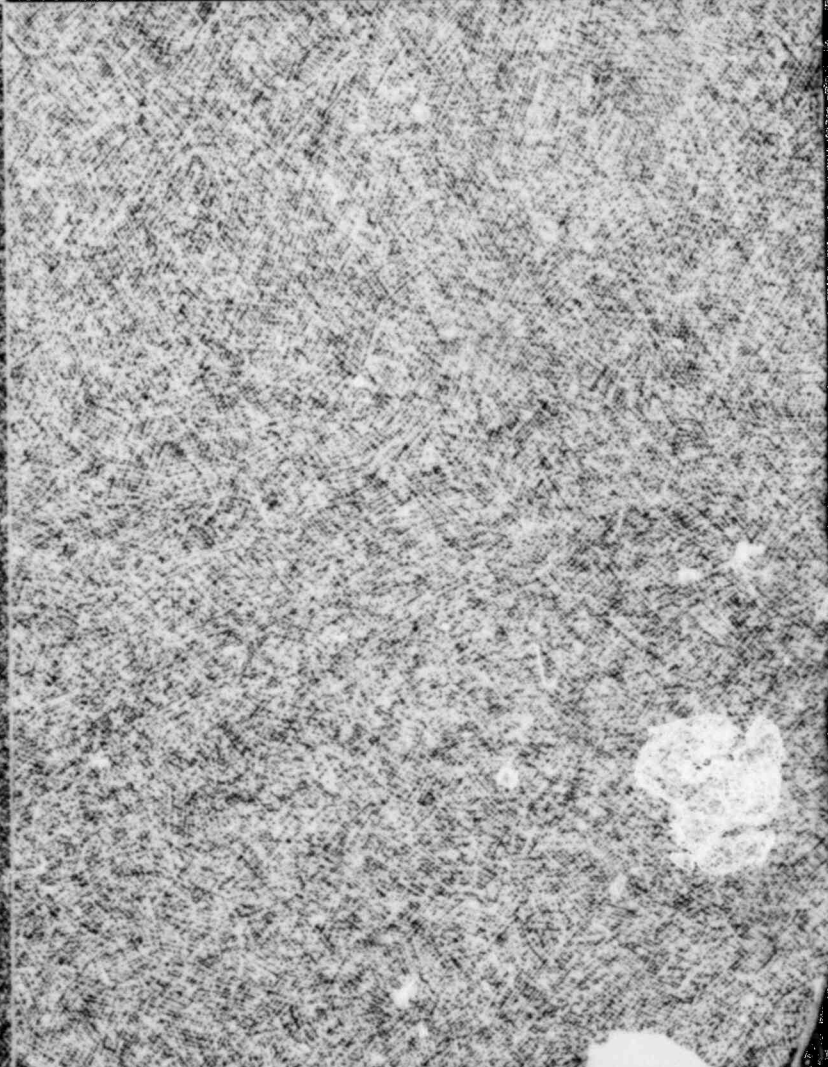
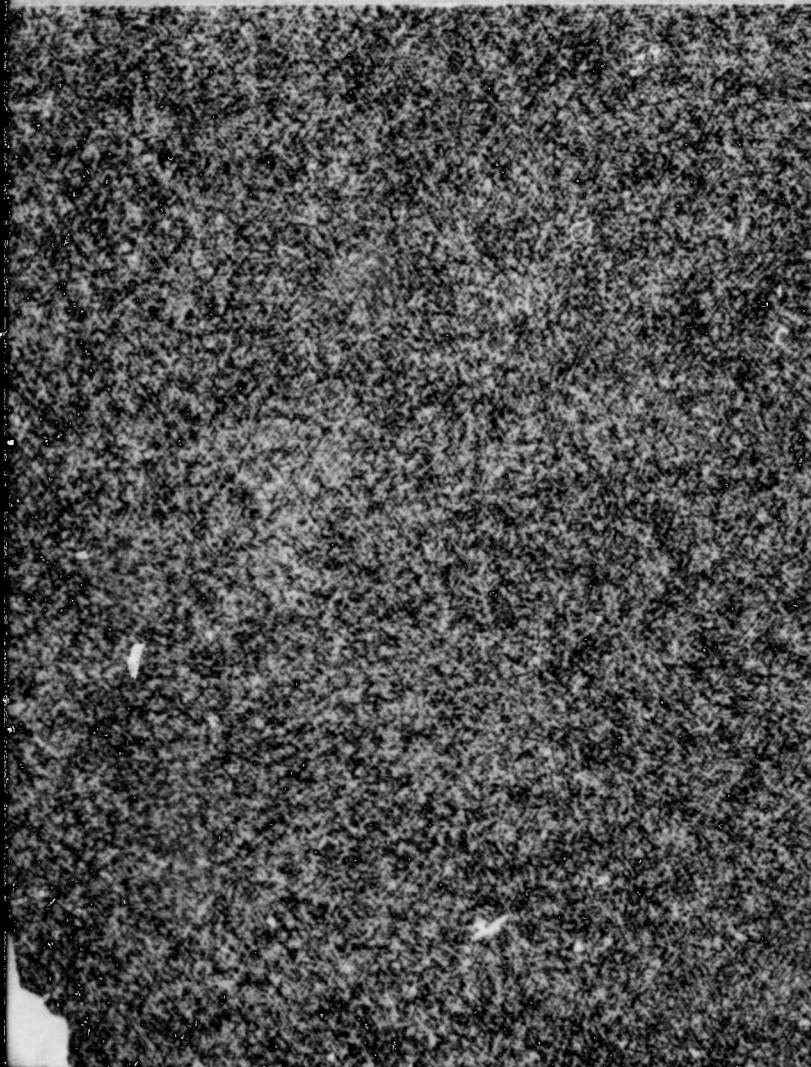
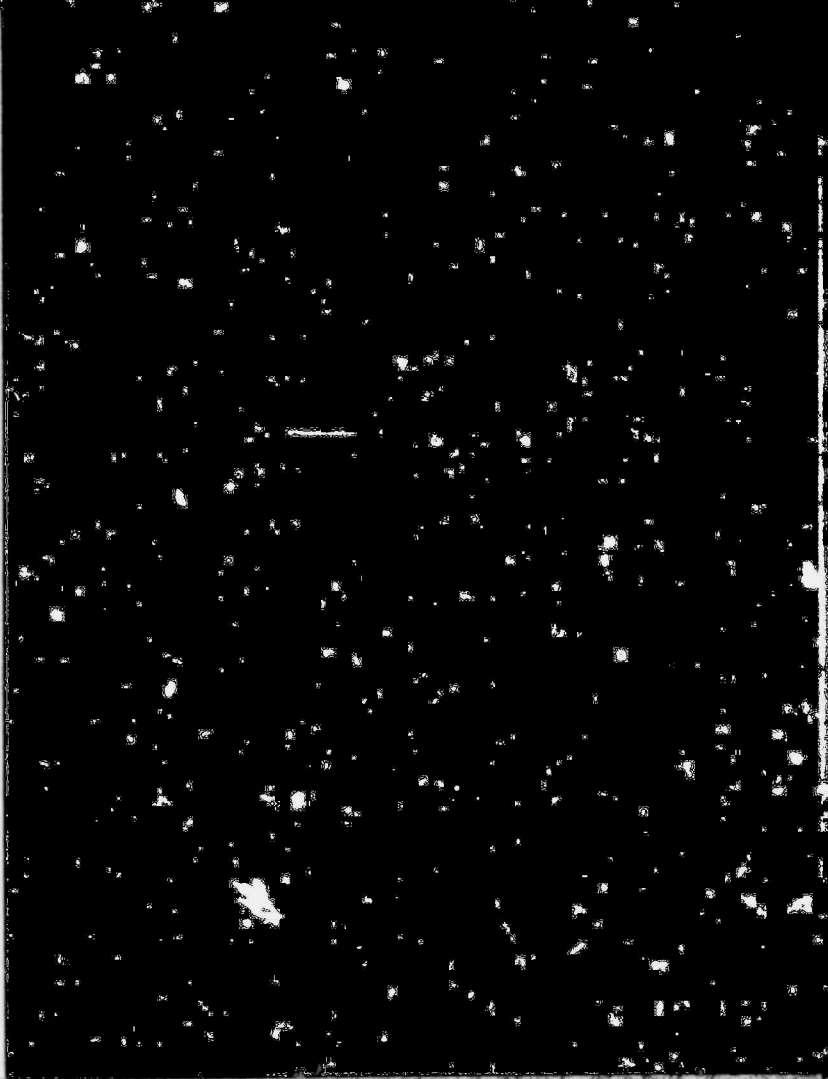
You are also referred to the testimony of Whitfield A. Russell, Ralph Miller, Norman Hill, Herbert Westfall, and H. P. Dugan filed in FERC Docket Nos. E-7777(II) and E-7796, the cross-examination of Whitfield A. Russell, Ralph Miller, Herbert C. Westfall and Norman Hill in those proceedings, as well as the answers of NCPA to PGandE interrogatories filed

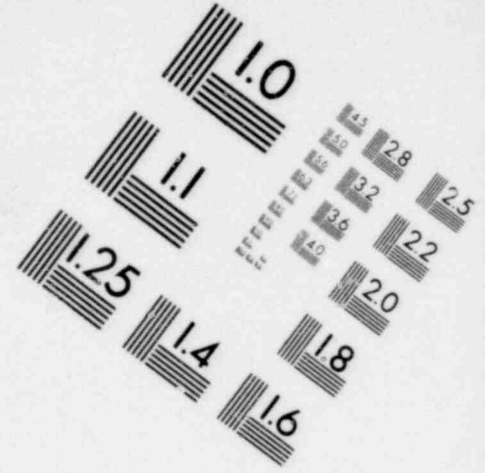
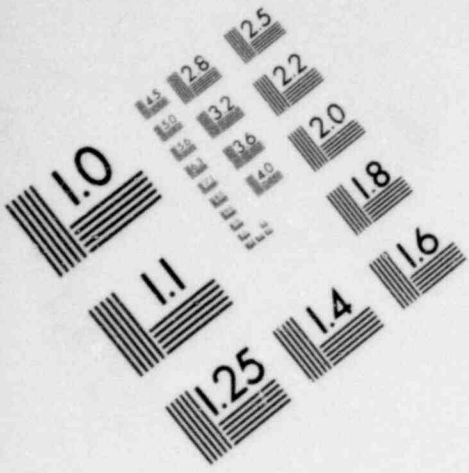
January 16, 1978 (as supplemented) in that proceeding.

In connection with PG&E's refusal to provide services related to spinning reserves, NCPA identifies the documents marked for identification in FERC Docket Nos. E-7777(II) and E-7796 with the following exhibit numbers:

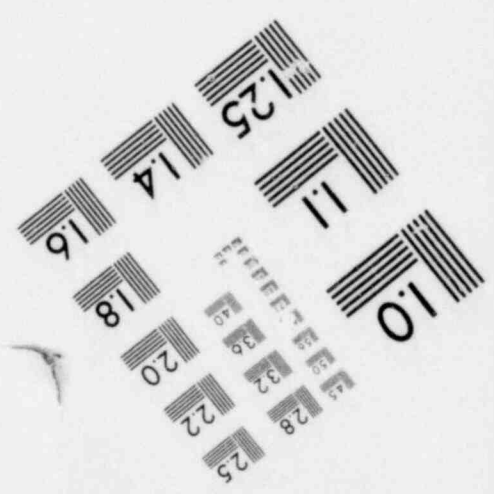
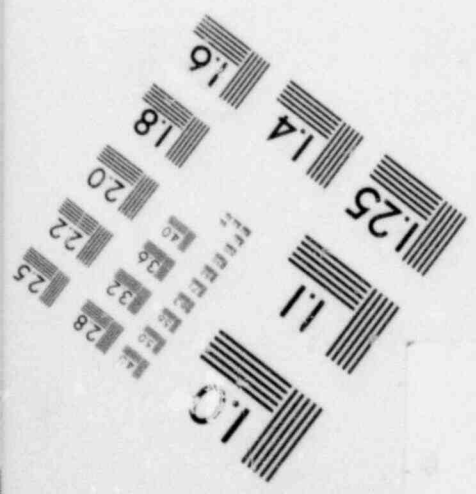
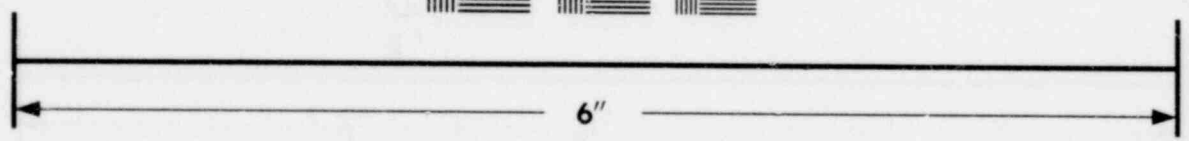
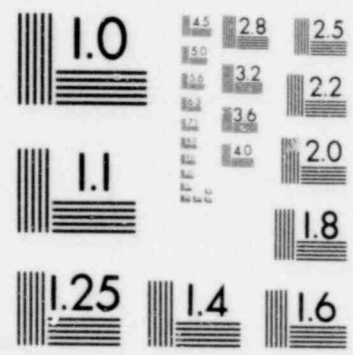
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- 2112 (WAR-X41)
- 2113 (WAR-X42)
- 2123 (WAR-X52)
- 2129 (WAR-X57)
- 2134 (WAR-X62)
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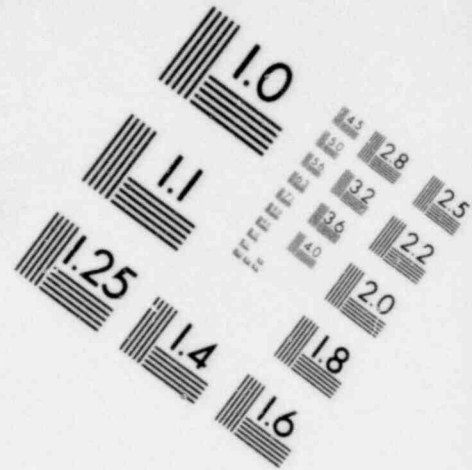
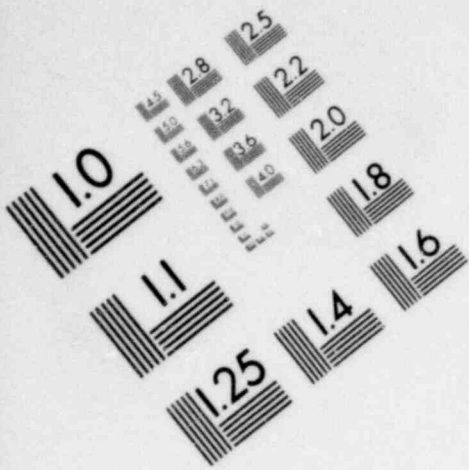
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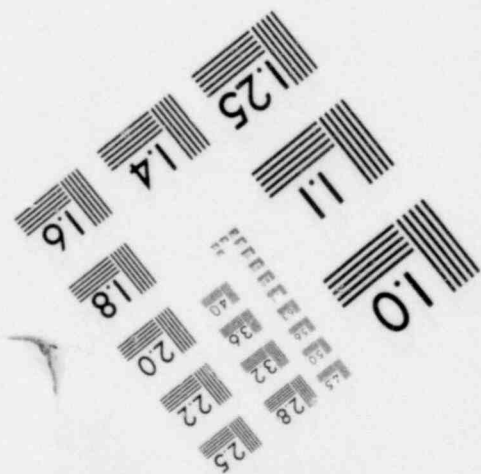
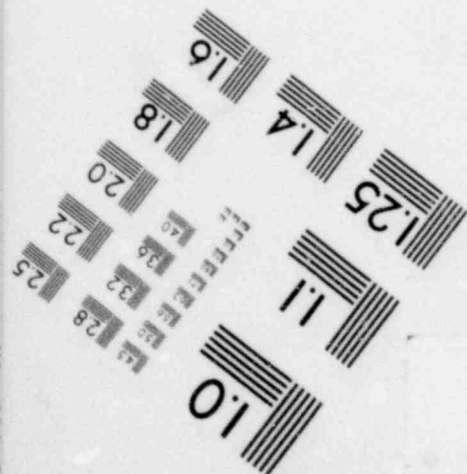
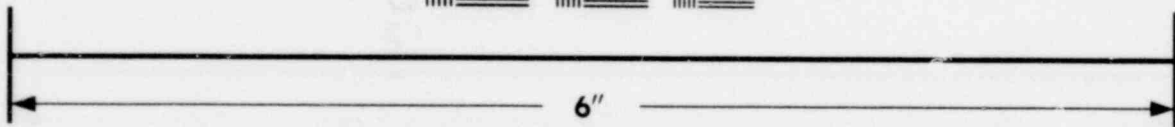
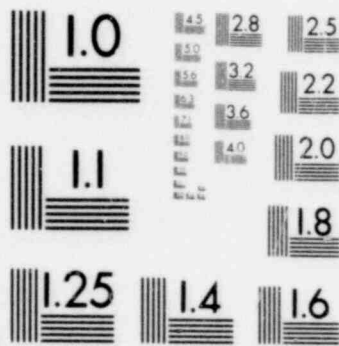


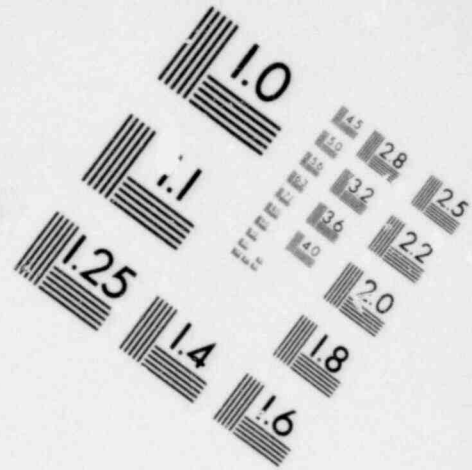
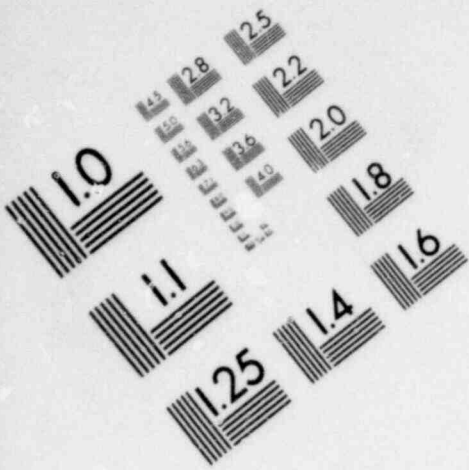
**IMAGE EVALUATION
TEST TARGET (MT-3)**



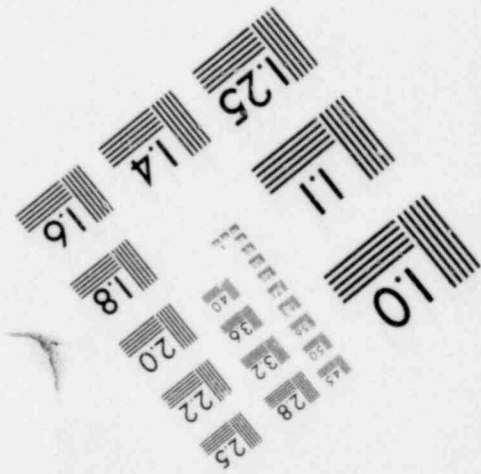
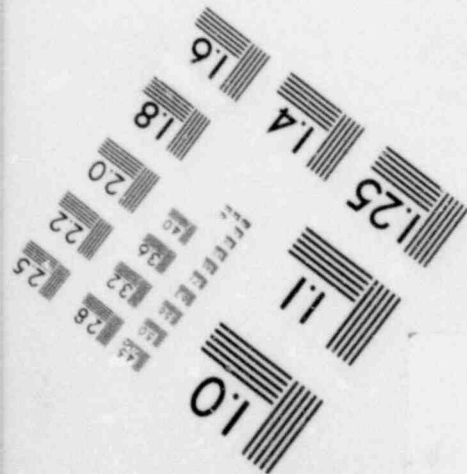
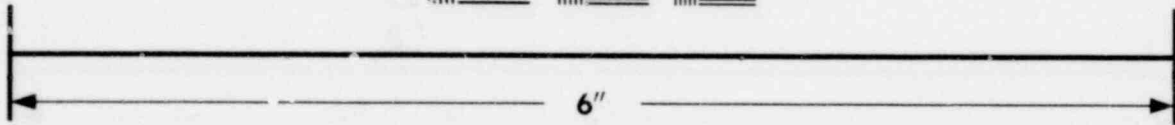
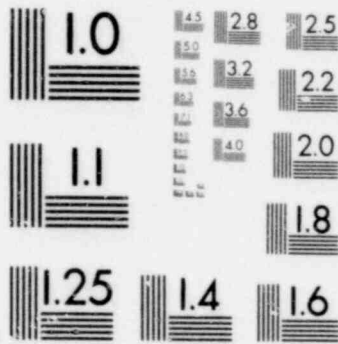


**IMAGE EVALUATION
TEST TARGET (MT-3)**





**IMAGE EVALUATION
TEST TARGET (MT-3)**



The complete description of all facts which indicate that PGandE has refused to sell power at wholesale and provide other electrical services for the purpose of preventing a takeover of PGandE's retail facilities by a municipality or other governmental agency will require the completion of discovery by PGandE and analysis of the materials received.

INTERROGATORY NO. 24.

Q. Do you have any information or belief which suggests to you that PGandE has failed to comply with the Stanislaus Commitments on any occasion since PGandE agreed to those Commitments? If so, please state your information or belief, the source of the information and the basis for the belief.

A. Yes. PGandE has failed to comply with the Stanislaus Commitments with respect to its refusal to wheel power to NCPA from the NCPA contracted resource at the Georgia-Pacific plant at Fort Bragg, California. Prior to the time NCPA proposed to deal with Georgia-Pacific, PGandE previously had purchased all of Georgia-Pacific's excess energy. PGandE has subsequently increased the price which it pays Georgia-Pacific and precluded NCPA from consummating its proposed transactions.

In addition, PGandE has unduly prolonged the negotiation of contractual arrangements to carry out the Stanislaus Commitments (the Commitments will be four years old in May of

1980) with the effect that the Stanislaus Commitments have not remedied the pernicious effects of the anticompetitive conditions in Northern California. Specifically, the provisions of Paragraph V, "Other Power Exchanges", require that PGandE have on file, or hereafter file with the Federal Power Commission, (now FERC) agreements or rate schedules providing for the sale and purchase of short-term capacity and energy, limited-term capacity and energy, long-term capacity and energy and economy energy available to any "Neighboring Entity." This commitment has not been carried out. For example, each of these types of services has been rendered by PGandE to San Diego Gas and Electric and Southern California Edison under terms of the California Power Pool Agreement. Nonetheless, PGandE has yet to file rate schedules or tariffs under which NCPA can obtain similar services.

PG&E has declined to make available capacity or energy to NCPA or its members from entities in the Pacific Northwest, except possibly under highly restricted circumstances. Although PG&E has reserved the right to deny NCPA and others certain services over the Intertie under Paragraph VII.A of the Stanislaus Commitments, PG&E's apparent interpretation of the breadth of its authority to restrict access to the Pacific Intertie under the Commitments is so extreme as to constitute non-compliance with the Commitments.

1352 002

PART C

INTERROGATORY NO. 62:

Q. Please identify each occasion during the period 1960 to present on which any of your employees, attorneys, agents, lobbyists or members of any of your City Councils have discussed with any member of the State legislature or any member of the staff of any State legislator any matter related to electric power generation or transmission including, without limitation, any preference legislation favoring governmentally owned electrical operations. For each such occasion, please identify the date, the place, the individuals involved and the subject of the discussion. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

A. Objection: Overbroad, unduly burdensome and not calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 63:

Q. Please identify every direct or indirect payment by you during the period 1960 to present to any person who was at the time a member of the State legislature or to any committee whose purpose was to honor or raise funds for any State legislator or any candidate for the State legislature.

Indirect payment includes, without limitation, the reimbursement to any individual of any such payment made by the individual. (NCPA should answer this interrogatory separately for NCPA and for each of its membes and associate members.)

A. As far as can be determined through reasonable inquiry, there have been no such payments.

INTERROGATORY NO. 64:

Q. Please state the method by which you and each of your members and associate members determine the price charged to customers for electrical energy. If the method differs between or among different categories of consumers, please indicate that, and describe each category and the method of pricing used for each such category. If the method used has changed in the past, please describe each such change, and if you presently have plans to change your method in the future, please describe your present plans.

A. NCPA does not presently charge prices to customers for electrical energy, because it does not sell electricity.

For the City of Lompoc, pricing is based on recovery of an amount sufficient to meet operating, maintenance, and capital costs in the foreseeable future with the costs distributed by means of rate schedules for different categories of customers such as residential, commercial, industrial, agricultural, street lighting, etc. A basic

change in pricing occurred in 1979 when the City of Lompoc implemented a schedule for residential users under which the unit costs for all levels of consumption were the same.

Plumas-Sierra Rural Electric Cooperative prices retail electric sales based on the amount of revenue required to cover the cost of power, operations and maintenance, and all other expenses plus an amount no less than 1.5 times interest earned.

Additional information on behalf of the other NCPA members will be provided.

To the extent this interrogatory seeks more detailed information or information concerning all past changes in pricing methods for each NCPA member, NCPA objects on the grounds that the interrogatory is overbroad, an undue burden and not reasonably calculated to lead to the discovery of admissible evidence.

PART D

INTERROGATORY NO. 65:

Please identify the "responsible officers" of NCPA and of each of its members and associate members with whom counsel for NCPA conferred to comply with the interim order for preservation of documents and records issued by the Board in this case on May 26, 1977, and for each "responsible officer" who is no longer employed by the entity of which he was a "responsible officer," please identify (a) the individual's successor and (b) the individual's current or last known business and residence address.

122 005

A. Upon receipt of the interim order for preservation of documents and records issued by the Board in this case on May 20, 1977, counsel for NCPA distributed the order to the Executive Director, Legal Committee and all members and managers of NCPA. A current list of such individuals and their addresses is attached as Exhibit 1 to these responses. For additional information concerning the officials of NCPA and its members, you are referred to NCPA's answers to the "First Set of Interrogatories Propounded to the Northern California Power Agency and its Members" dated November 4, 1977.

INTERROGATORY NO. 66:

Please describe separately for NCPA, each of its members, associate members, and NCPA's general counsel all documents, files or other materials which were determined to be "arguably . . . relevant to any issue or sub-issue raised by any party to this proceeding." For this purpose, the documents, files or other materials may be described by categories such as, for example, "all files in Department Y."

A. As indicated in the previous answer, the Board's interim order was distributed to all responsible officers of NCPA and its members. At that time special attention was called to the language of the Board's order requiring that all reasonable measures be taken to preserve intact all

existing documents, files and other materials which arguably might be relevant to any issue or sub-issue raised by any party to this proceeding, and the NCPA officials specifically were requested not to destroy files in any way reflective of issues relevant to competition or general problems of wholesale power supply. In addition, the NCPA officials were instructed not to destroy any file if there was a question as to whether documents were relevant.

As an aid in identifying issues in any way relevant to this proceeding, the Executive Director and members of NCPA subsequently were sent copies of the Board's "Order Regarding Special Rehearing Conference: Identification of Issues: Discovery Schedule," dated July 14, 1977. At that and subsequent times, NCPA's members were reminded of the Board's order prohibiting destruction of any documents which may in any way be relevant to the proceeding.

As was indicated in NCPA's responses to the "First Set of Interrogatories Propounded to the Northern California Power Agency and its Members" of November 4, 1977 (answers of December 19, 1977 and January 13, 1978), NCPA's policy has been to retain all documents. Thus there has been no need to identify files or other materials "arguably . . . relevant to any issue or sub-issue raised by any party in this proceeding." Additional details concerning the document retention policies of individual NCPA members have been pro-

vided in response to PGandE's first set of interrogatories. (See Interrogatory No. 23 and responses thereto.) Also included in those prior responses was detailed information about the files of NCPA and its members, as well as the persons responsible for such files. (See Interrogatories 15-18 of PGandE's First Set of Interrogatories and responses thereto).

To the extent Interrogatories 65-70 seek information beyond that provided here and in answer to the preceding interrogatory, NCPA objects on the ground that the interrogatory is an undue burden and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 67:

Please describe separately for NCPA, each of its members, associate members, and NCPA's general counsel the measures which have been taken to preserve intact the documents, files or other materials described in your Response to Interrogatory No. 37, [sic - 66?] above. Please include in your response the identification of any documents containing or reflecting such measures as, for example, any administrative policy or amendment to a document retention policy.

A. See answers to Interrogatory Nos. 65 and 66.

1332 008

INTERROGATORY NO. 68:

Please describe separately for NCPA, each of its members, associate members and NCPA's general counsel all documents files or other materials which were determined not to be "arguably . . . relevant to any issue or sub-issue raised by any party to this proceeding." For this purpose, the documents, files or other materials may be described by categories, as indicated in Interrogatory No. 66, above.

A. See answers to Interrogatory Nos. 65 and 66.

INTERROGATORY NO. 69:

Please describe separately for NCPA, each of its members and associate members and NCPA's general counsel the document retention policy which is applicable to all the documents, files or other materials identified in your Response to Interrogatory No. 68, above. If the policy is set forth in writing, please identify the writing and, if there is no policy or if the practice has in any way deviated from the policy at any time since 1960, please describe such practice or practices and, with respect to any deviations between practice and policy, state the reason for the deviation in each case.

A. See answers to Interrogatory Nos. 65 and 66.

1332 009

INTERROGATORY NO. 70:

Please identify the custodian(s) of the documents, files or other materials identified in your Response to Interrogatory Nos. 66 & 68, above, during the period May 26, 1977 to the date of your responses.

A. See answers to Interrogatory Nos. 65 and 66.

INTERROGATORY NO. 71:

Please identify each alternate source of bulk power which you believe was available to you or any of your members or associate members during any of the "long-term all-requirements contracts" to which you refer in paragraph 7a of your Petition to Intervene in this case. As to each such alternate source, please state the identity of the source, the amount and type of power available, the time period and the price.

A. The alternate sources of bulk power which were available to NCPA members are essentially the same for NCPA and all members except insofar as the CVP customers which belong to NCPA have PGandE as an alternate supplier. The number of alternate bulk power supply sources would vary substantially depending upon what changes might be made in contracts to which PGandE and other members of the California Power Pool and other non-NCPA utilities are signatories. In

1332 010

addition, implementation of the Stanislaus Commitments by PGandE in the form of rate schedules and tariffs would also affect the number of potential alternate bulk power sources. Without such implementation of the Stanislaus Commitments and/or changes in the existing contractual arrangements to which the CPP Companies and others are signatories, NCPA has essentially no alternatives to PGandE as a power supplier.

However, if appropriate modifications had been made to the agreements which PGandE has with the Northern California irrigation, water and public utility districts, SMUD, CVP, PGandE's industrial sources, Pacific Intertie arrangements, the Seven Party Agreement, and perhaps other agreements, the opportunities for development of alternative sources by NCPA with these and other entities, including entities in the Pacific Northwest and other parts of the WSCC region, would have been enhanced considerably.

INTERROGATORY NO. 72:

In your Response to Interrogatory No. 32 in the Interrogatories from PGandE to NCPA dated November 4, 1977 in FERC Docket E-7777 Phase II, you stated that you assumed that

"if PGandE had not agreed to purchase SMUD's surplus power, SMUD could have sold it in the Northwest (or to others in California or elsewhere) on terms more favorable to SMUD."

1332 011

Please identify those entities whom you believed or assumed would have been able and willing, in or prior to 1970, to purchase or agree to purchase SMUD's surplus power on terms and conditions more favorable to SMUD than those contained in the PGandE-SMUD contract.

A. PG&E's complete Interrogatory No. 32 in FERC Docket Nos. E-7796 and E-7777(II) and NCPA's complete answer are:

"Interrogatory No. 32. Do you admit that PGandE's contractual obligation under the 1970 SMUD Contract to purchase SMUD power surplus to SMUD's needs had the effect of increasing the marketability of the debt securities issued to finance Rancho Seco Unit No. 1? If not, please state your contention."

"Answer: No. As is the case with numerous other PG&E interrogatories, this question depends on a comparison between the effects of events as they transpired with the effects of unspecified events, which might have otherwise occurred as well as the alternative if SMUD had access to coordination with power agencies throughout the regional interconnected system. Answers can only be given by making reasonable assumptions concerning those alternative possible events and the effects thereof. For example, NCPA has assumed that if PG&E had not agreed to purchase SMUD's surplus power, SMUD could have sold it in the Northwest (or to others in California or elsewhere) on terms more favorable to SMUD. This assumption is reasonable because CVP, among others, is now purchasing power from entities in the Northwest at rates considerably in excess of the rates currently paid to SMUD by PG&E for SMUD's excess power. Indeed, the SMUD entitlement to capacity in the Intertie was considered in 1964 to 'make it possible for SMUD [in 1976] . . . to construct an atomic power plant of economic size.'
1/ It is NCPA's estimate that SMUD, unconstrained by PG&E, could have obtained backup and sold surplus power on much more advantageous terms than

it has and now does and that such more advantageous terms would have increased the marketability of SMUD's securities over that which resulted from PG&E's 1970 contractual obligation."

1/ "Report to the Appropriations Committee of the Congress of the United States Recommending a Plan of Construction and Ownership of EHV Electric Intertie between the Pacific Northwest and Pacific Southwest, June, 1964, p. 37 ('Intertie Report').")

In answering the foregoing interrogatory in FERC Docket Nos. E-7796 and E-7777 (Phase II), NCPA did not identify particular entities whom NCPA believed or assumed would have been able and willing in or prior to 1970, to purchase or agree to purchase SMUD's surplus power on terms and conditions more favorable to SMUD than those contained in the PG&E-SMUD contract. Because of the restrictions contained in the PG&E-SMUD contract, there has been no occasion or need to investigate or identify particular entities. However, NCPA would expect such entities to be among those which participated or planned to participate in the development of arrangements for other electric power resource projects such as the Navajo project, Centralia, San Onofre, San Joaquin, Mohave and other joint ventures within transmission distance of SMUD.

1332 013

10/1/79

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