

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

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

RESPONSE OF THE CITY OF RIVERSIDE, CALIFORNIA
TO PACIFIC GAS AND ELECTRIC COMPANY'S FOURTH
SET OF INTERROGATORIES TO THE CITIES OF ANAHEIM AND RIVERSIDE

The City of Riverside, California responds to the fourth set of interrogatories propounded to it 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;

POOR ORIGINAL

1372 004

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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;

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

(vi) 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.

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

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1372 005

ANSWERS TO INTERROGATORY NO. 1

PC&B'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 Interstate and Pacific Southwest power development
f. Nature and Source of material received by Witness	None
g. Written or Oral Reports by Witness	None
1. Source and Author	
11. Persons who received Reports	
111. Persons possessing Reports	
17. Capacity in which Reports submitted	
2. Whether intended as a witness	Unknown
3. 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. 88-282
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 included as a witness	Unknown
i.	When status as witness to be determined	Unknown

1372 007

POOR ORIGINAL

ANSWERS TO INTERROGATORY NO. 1

SCRP'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 CVB and Inertite
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 acting as witness to be determined	Unknown

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1372 008

ANSWERS TO INTERROGATORY NO. 1

EG&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

POOR ORIGINAL

1372 009

ANSWERS TO INTERROGATORY NO. 1

FOIA'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. Pels, Loy Kirkpatrick and Robert Ratcliffe, DOE Attorneys
b. Date of First Contact	Pels and Kirkpatrick (late 1960's) Ratcliffe (January 1973)
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

POOR ORIGINAL

1372 010

ANSWERS TO INTERROGATORY NO. 1

PCAP'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. Lindseath 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 USAR 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(1st), 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

1372 011

POOR ORIGINAL

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	Intervale 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
j. When status as witness to be determined	Unknown

1372 012

POOR ORIGINAL

ANSWERS TO INTERROGATORY NO. 1

SC&P'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, Gaines 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. | What status as witness to be determined | Unknown |

1372 013

POOR ORIGINAL

ANSWERS TO INTERROGATORY NO. 1

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

INTERROGATORY SECTION

a. Name, Employer and Address	Robert E. 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 E. Hartley
ii. Persons who received Reports	Unknown in toto
iii. Persons Possessing Reports	Unknown in toto
iv. Capacity in which Reports submitted	Expert and participant witness
h. Whether intended as a Witness	Unknown
i. When status as witness to be determined	Unknown

1372 014

POOR ORIGINAL

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

POOR ORIGINAL

1372 015

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, Intertie 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

POOR ORIGINAL

1372 016

POOR ORIGINAL

-14-

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 Klinka 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 PG&E
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

1372 017

ANSWERS TO INTERROGATORY NO. 1

FERC'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
Vichayathil, 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 Participant witness
on BPA Joint Scheduling Office |
| h. | Whether intended as a witness | Unknown |
| j. | What status as witness to be determined | Unknown |

1372 018

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. E. Hartley, E. Hopkins, 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. This and other proceedings. It would be impossible to disaggregate the time or 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

EG&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 Klinka Western Area Power Administration 2800 Cottage Way Sacramento, California
b.	Date of First Contact	Summer 1979
c.	Whether Retained	No
d.	Experience and Qualifications	Transmission Planning Engineer
e.	Nature of Inquiry	Contract 2948A, especially USER 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.	
	ii.	
	iii.	
	iv.	
h.	Whether intended as a witness	Unknown
i.	When status as witness to be determined	Unknown

POOR ORIGINAL

-13-

ANSWERS TO INTERROGATORY NO. 1

FOIA's Fifth Set of Interrogatories to NCPA and EWR and
Fourth Set to Asaneta 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

1372 021

POOR ORIGINAL

-19-

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	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
j. When status as witness to be determined	Unknown

1372 022

POOR ORIGINAL

-20-

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	1963
c. Whether Retained	No
d. Expertise and Qualifications	Engineer
e. Nature of Inquiry	Negotiation of Interrole 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

1372 023

POOR ORIGINAL

-21-

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

1372 024

ANSWERS TO INTERROGATORY NO. 1

PC&P's Fifth Set of Interrogatories to NCPA and DWR and
Fourth Set to Anaheim and Riverside

INTERROGATORY SECTION

- | | |
|--|--|
| 1. Name, Employer and Address | Richard Nassief
Northwest Power Pool (NWPP) |
| 2. Date of First Contact | Summer 1978 |
| 3. Whether Retained | No. |
| 4. Expertise and Qualifications | Utility System Operator
(Formerly Edison) |
| 5. Nature of Inquiry | None |
| 6. Nature and Source of material received by Witness | None |
| 7. Written or Oral Reports by Person | None |
| 8. Source and Author | |
| 9. Persons who received Reports | |
| 10. Persons Possessing Reports | |
| 11. Capacity in which Reports submitted | |
| 12. Whether intended as a witness | Unknown |
| 13. 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 | 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. | |
| | ii. | |
| | iii. | |
| | iv. | |
| h. | Whether intended as a witness | Unknown |
| i. | When status as witness to be determined | Unknown |

1372 026

ANSWERS TO INTERROGATORY NO. 1

PG&E's Fifth Set of Interrogatories to NCEA 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 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. ER74-332, E-7777 (II) and E-7796. |
| | i. | Whitfield A. Russell |
| | ii. | Persons on service list in referenced dockets; unknown in entirety. |
| | iii. | Persons on service list in referenced dockets; unknown in entirety. |
| | iv. | Expert |
| h. | Whether intended as a witness | Unknown |
| i. | When status as witness to be determined | Unknown |

1372 027

ANSWERS TO INTERROGATORY NO. 1

Plaintiff'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 FERC Docket Nos. E-7796
and E-7777 (II) and Projects
2736 and 1983. |
| 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

Plande'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 acting as witness to be determined | Unknown |

1372 029

POOR ORIGINAL

INTERROGATORY NO. 2:

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.)

INTERROGATORY #2

See enclosed map (City of Riverside) of existing five Riverside-Edison 66KV source lines serving the City from Edison's Vista Substation located 4 miles north of the City Limits. Edison owns and maintains the five lines up to the city limit line where ownership and maintenance reverts to the City. As of September 1979, total mileage of the 66KV lines within the City is 53 miles.

1372 030

POOR ORIGINAL

INTERROGATORY NO. 3:

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 #3

As of September 24, 1979, the City's intent is to construct the following two 66KV separate facilities:

- (a) Construct in November 1979 a 500' tap line off the existing Vista-Hunter #2 - 66KV line at the Alumax property adjacent to the Santa Fe Railroad northerly of Columbia Avenue. This line will serve a new 7.5 MVA 66/4KV substation located on Alumax property to serve only Alumax.
- (b) Planned to be constructed during the winter of 1980-81 is a new 6th - 66KV source line from Edison's Vista Substation to the City's Mt. View Substation located at Mt. View Avenue and

1372 031

the Union Pacific Railroad right of way. Edison will construct the portion from Vista Substation to the northerly city limits by double circuiting the existing Vista-Riverside line. Riverside will construct the new portion from the city limits to Riverside substation by double circuiting the Vista-Riverside portion and joining the existing Riverside-Mt. View line which will be utilized for the 6th service line from Vista.

INTERROGATORY NO. 4:

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 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.)

1372 033

INTERROGATORY #4

Numerous studies and meetings concerning transmission planning have been held over the past 20 years between Riverside Public utilities Department staff and numerous representatives of Southern California Edison and various consultants hired by the City.

Transmission studies resulting in formal reports are as follows:

- (1) October 1962 - Power Supply Study for Cities of Colton, Anaheim and Riverside, Zinder & Associates (consultant).
- (2) January 1971 - Electric Transmission Study, R. W. Beck & Associates (consultant).
- (3) December 1959 - Joint Southern California Edison -City of Riverside Electric Power Transmission Study.
- (4) February 1966 - Same as (c) above.
- (5) Joint study with Edison regarding 220KV transmission lines service from Edison's Vista and Mira Loma substations to proposed Riverside Jurupa 220/66KV substation located on Wilderness Avenue at the westerly city

1372 034

limits adjacent to the Metropolitan Water District right of way. (1973-1976).

- (6) Various studies with Edison re additional source 66KV lines from Vista Substation to Riverside including the #5 Vista-La Colina, #2 Vista-Hunter, and 1959 study concerning uprating and conversion of existing 33KV source lines to 66KV.

In addition to the aforementioned meetings and studies, several meetings were held with Los Angeles Department of Water & Power representatives concerning:

- (a) Study of voltage uprating of the existing 800KV DC Northwest-Southwest intertie.
- (b) The rebuilding to 500KV of LADWP's existing 287KV Boulder-Los Angeles transmission lines.
- (c) Transmission related to the planned Intermountain Power Project.

Numerous meetings concerning related transmission planning for the Sundesert

1372 035

Nuclear Project and Palo Verde #4 and #5 were held with representatives of the participating utilities.

PG&E has had access to all files relating to transmission planning.

All responsive documents were provided by Riverside for PG&E's inspection in response to PG&E's discovery requests in this proceeding.

1372 036

INTERROGATORY NO. 5:

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.)

INTERROGATORY #5

See attached chart.

POOR ORIGINAL

1372 037

POOR ORIGINAL

5

Electric Revenue Bonds
Outstanding Each Year Since 1960

Year	Ac. of Source	1966 Revenue Bonds	1971 Revenue Bonds	1972 Revenue Bonds	1973 Revenue Bonds	1974 Revenue Bonds	1975 Revenue Bonds	1976 Revenue Bonds	1977 Revenue Bonds	1978 Revenue Bonds	1979 Revenue Bonds	Total
1960												
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1372 038

POOR ORIGINAL

INTERROGATORY NO. 6:

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 needed legislative or voter approval. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

INTERROGATORY #6

See attached chart.

1372 039

BONDING CAPACITY

INTERROGATORY #6

<u>Year</u>	<u>Net Revenues (000's)</u>	<u>Allowable Debt Service (000's)</u>	<u>Total* Bond Capacity (000's) @ Avg. 5.05% Interest</u>
1960	1,818	1,211	18,510
1961	1,868	1,245	19,030
1962	2,053	1,370	20,941
1963	2,160	1,441	22,026
1964	2,417	1,612	24,640
1965	2,632	1,754	26,810
1966	2,654	1,769	27,040
1967	2,986	1,990	30,418
1968	3,328	2,219	33,918
1969	2,860	1,907	29,149
1970	3,043	2,028	30,998
1971	3,163	2,108	32,221
1972	3,341	2,227	34,040
1973	4,156	2,771	42,355
1974	4,958	3,305	50,518
1975	6,200	4,133	63,171
1976	5,452	3,635	55,562
1977	5,036	3,357	51,312
1978	8,333	5,556	84,925

\$76,000,000 committed for distribution facilities, San Onofre and economy power.

\$8,925,000 assumed available for transmission facilities.

No specific limitation applies to transmission. Riverside City Charter Section 1306 (e) states the amount of the utility's equity for the purpose of which such bonds are to be issued equals at least 66 2/3% of the aggregate of the amount of bonds to be so issued and the amount of revenue bonds outstanding.

* Bonding capacity depends upon actual interests related to future issues. Rate used = average of outstanding issues.

1372 040

INTERROGATORY NO. 7:

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 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 a municipal election). (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

INTERROGATORY #7

Source of Funding

Riverside's sources of funding are current Revenues (Net Income + Depreciation Expense) and Contributions in Aid of Construction.

POOR ORIGINAL

1372 041

POOR ORIGINAL

INTERROGATORY NO. 8:

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 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.

INTERROGATORY #8

Combination of electric revenues and electric revenue bonds.
All data responding to subsections 8(a) through (e) was produced for PG&E's inspection in response to PG&E's discovery requests in this proceeding.

1372 042

POOR ORIGINAL

INTERROGATORY NO. 9:

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 reasons for their support or opposition.

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.

1372 043

INTERROGATORY #9

Riverside City Council approves proposed construction projects through budgetary process each year. All responsive documents were provided for PG&E's inspection in response to PG&E's discovery requests in this proceeding.

1372 044

POOR ORIGINAL

INTERROGATORY NO. 10:

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.)

INTERROGATORY #10

Riverside owns no electric generating capacity.

1372 045

POOR ORIGINAL

INTERROGATORY NO. 11:

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

INTERROGATORY #11

The City of Riverside is presently planning to participate in the following electrical generating projects:

<u>Project</u>	<u>Capacity</u>	<u>Riverside's Proposed Participation</u>	
San Onofre Nuclear Gen. Station, Units #2 & 3	2-1100MW Units	19.7MW/Unit	39.4MW/Total
Intermountain Power Project	4-750MW Units	51MW/Unit	204MW/Total
Calif. Coal Project	3-500MW Units	11.8MW/Unit	35.4MW/Total
White Pine Coal	2-500MW Units	13.2MW/Unit	26.6MW/Total
DWR Coal	Unknown at this time		

Riverside has also requested the opportunity to participate in the Stanislaus Nuclear Projects.

1372 046

INTERROGATORY NO. 12:

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 at which such 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.)

POOR ORIGINAL

1372 047

INTERROGATORY #12

Riverside has sought and requested capacity and participation in several other projects in California and Arizona, which for circumstances beyond Riverside's control, were not authorized by regulatory agencies, cancelled by the Project Manager, or feasibility was not established:

Bolsa Chica Project
Metropolitan Water District Low Head
Hydro Plants on Distribution Lines
San Joaquin Nuclear Project
Sundesert Nuclear Project
Palo Verde Nuclear Project, Units 4 & 5
Kaiparowits Coal Project
Warner Coal Project
Allen Coal Project
Heber Geothermal Project
China Lake Geothermal Project
Cholla Coal Project, Unit 4
Castaic Pump Storage Project
Balsam Meadow Hydro Project

All responsive documents were provided by Riverside for PG&E's inspection in response to PG&E's discovery requests in this proceeding.

POOR ORIGINAL

1372 048

INTERROGATORY NO. 13:

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.)

INTERROGATORY #13

See #6 for reply.

POOR ORIGINAL

1372 049

INTERROGATORY NO. 14:

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.)

INTERROGATORY #14

See #7 for reply.

POOR ORIGINAL

1372 050

INTERROGATORY NO. 15:

Please described 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 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.

INTERROGATORY #15

See #8 for reply.

1372 051

POOR ORIGINAL

INTERROGATORY NO. 16:

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.

1372 052

INTERROGATORY NO. 16

We have gone to the Utility Board and City Council numerous times with respect to Riverside's proposed participation in the San Onofre Nuclear Generation Station Units No. 2 and 3.

All responsive documents were provided by Riverside for PG&E's inspection in response to PG&E's discovery requests in this proceeding.

1372 053

INTERROGATORY NO. 17:

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 of all documents containing the request or denial. (NCPA should answer this interrogatory separately for NCPA and for each of its members and associate members.)

INTERROGATORY #17

Riverside objects to Interrogatory No. 17 as being duplicative of Interrogatory Nos. 45-52 of PGandE's Third Set of Interrogatories to Anaheim in this proceeding.

POOR ORIGINAL

1372 054

INTERROGATORY NO. 13:

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 member cities of NCPA should be identified in response to this interrogatory.

POOR ORIGINAL

1372 055

INTERROGATORY #18

The City of Riverside entered into an Economy Energy Agreement with Nevada Power Company, dated June 1, 1976, to purchase economy energy. In order to transmit such energy to Riverside, Riverside entered into an "Agreement for Integration and Transmission of Non-Firm Energy Purchased by Riverside from Nevada Power Company" with Southern California Edison Company, dated June 29, 1976. As an alternate path to transmit such energy to Riverside, a Transmission Service Agreement was entered into between Riverside and the Los Angeles Department of Water and Power, dated April 26, 1977. Riverside also entered into an agreement with Southern California Edison Company to provide interruptible transmission service for energy delivered by Los Angeles pursuant to the foregoing Agreement to Edison for transmission to Riverside. The date of that Agreement is November 9, 1978.

Anaheim and Riverside entered into a Settlement Agreement, dated August 4, 1972, which provided, among other things, that both cities would have an option to acquire generating capacity from Edison's share of San

POOR ORIGINAL

1372 056

Onofre Nuclear Generating Station Units 2 and 3. Subsequently, Anaheim and Riverside entered into a November 1, 1977 Letter Agreement with Southern California Edison and San Diego Gas and Electric Company which provided that the San Onofre Units 2 and 3 Participation Agreement, a supplemental agreement for integration of Anaheim's entitlements in San Onofre Unit 2 and Unit 3, a supplemental agreement for integration for Riverside's entitlements in San Onofre Unit 2 and Unit 3, and Edison-Anaheim-San Onofre Transmission Service Agreement and an Edison-Riverside-San Onofre Transmission Agreement had been negotiated and were in final form and would be executed by the parties upon the occurrence of certain conditions. The aforementioned Agreements have not yet been executed.

On June 8, 1978, in separate agreements, Anaheim and Riverside each entered into an Agreement with the United States acting through the Bonneville Power Administration. These Agreements provide for the sale to each city of surplus energy and provisional energy. There have been no transactions pursuant to these Agreements because neither Anaheim nor Riverside has been able to secure transmission service from the California-Oregon border to each of the cities.

1372 057

Each of the cities entered into a Transmission Service Agreement with the California Department of Water Resources to transmit energy from the California-Oregon border to the Midway Substation of Pacific Gas and Electric Company. However, Southern California Edison Company, Pacific Gas and Electric Company and San Diego Gas and Electric notified both DWR and the cities that the Transmission Service Agreement was a nullity and, therefore, the companies would not permit any transactions to take place pursuant to the Transmission Service Agreement. The term of the Transmission Service Agreement has since expired. Anaheim and Riverside are negotiating with Southern California Edison Company a Non-Firm Transmission Service Agreement from the California-Oregon border to the cities, but no Agreement has been executed at this time.

Anaheim and Riverside are currently studying the feasibility of participating in the ownership of generation facilities, transmission lines or acquiring by purchase, power and energy therefrom. However, at the present time none of these projects have proceeded further than the feasibility study stage.

1372 058

INTERROGATORY NO. 19:

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). If so, please state the following with respect to each such understanding, agreement or contract:

(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.

INTERROGATORY #19

Riverside has not been in the past, nor is it today, a party to any such understanding, agreement, or contract.

POOR ORIGINAL

1372 059

INTERROGATORY NO. 20:

State separately in full the method by which you forecast your own load, generation requirements, purchase 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.

INTERROGATORY #20

General Forecasting Methods

A. General Methodology

The City of Riverside's demand and energy forecasts were developed by the Economic Sciences Corporation (ESC) as a part of the need for power in Southern California Sundersert Nuclear Project.

E.S.C. prepared forecasts of sales, peak and base demand from a model prepared for the City of Riverside.

The methodology uses an econometric model to forecast annual energy sales for the residential, commercial, industrial and other sectors for each utility. The resulting forecast, referred to as the base case forecasts, includes the effects of "price induced" conservation but does not adequately capture the non-price conservation potential. E.S.C. used an end use model of the residential sector to obtain the conservation impact of the California Energy Conservation and Development Commission (CERCDC) mandated appliance efficiency standards and the residential building standards. E.S.C. used a model of prototypical building to develop a conservation impact of the CERCDC Title 24 non-residential building standards. The conservation case was obtained by subtracting the expected energy savings due to the appliance efficiency standards and the Title 24 non-residential building standards from the base case forecasts. The conservation case forecasts captures the effects of both price induced conservation and certain non-price conservation.

I. Base Case Forecast

The econometric model consists of regression equations to determine the number of residential electric customers, residential sales per customer, commercial sales, industrial sales, summer peak and base demands.

The residential model describes residential customers as a function of total households, and residential usage per customer as a function of the real prices of electricity, natural gas and appliances and the real per capita income. This is the standard consumer demand model for electricity. The electricity and gas price variables are measures of marginal costs.

POOR ORIGINAL

1372 060

The commercial and industrial models describe total sales as a function of the real prices of electricity and natural gas and some measure of industry output, e.g., taxable sales.

The other sales sector generally consists of street lighting and inter-departmental sales. Other sales are assumed to be a function of the size of the city which can be represented by the number of residential electric customers.

The peak and base demand model describes demand as a function of total electric sales and the composition of sales between the residential and non-residential sectors.

The historical data used in equation estimation were obtained from forms previously submitted by the City of Riverside to CERCDC, plus recent updates supplied by the City of Riverside. The equations were estimated using annual time series data over the interval 1950 through 1976.

The forecasts of independent economic variable such as population, taxable sales, personal income, consumer price index, etc., were all assumed. These assumptions were all based upon those adopted by CERCDC or upon other work done by the CERCDC staff. Forecasts of electric and natural gas prices were based on CERCDC staff cost studies.

2. Conservation Case Forecasts

A conservation adjustment was developed to account for the CERCDC appliance efficiency standards and the CERCDC residential and non-residential building standards. The appliance efficiency standard adjustment was developed by applying the savings per customer (calculated by the CERCDC staff, for the County of Riverside to the City's residential sales forecast. The savings per customer was developed by the CERCDC staff by simulating their residential end-use model for Riverside County under the two alternative assumptions of no standards and enforced standards. The percentage difference in use per customer between the two simulations was the projected savings per customer due to the appliance efficiency standards.

The Title 24 impact analysis procedure developed by the E.S.C. for CERCDC was applied to the City of Riverside.

The commercial conservation potential was deducted from the base case commercial forecast to develop the conservation case forecast. The peak and demand equations were simulated using the conservation case energy case forecast to develop the conservation case demand forecast.

The conservation case is viewed as the most likely case for resource planning and is the end result used in Riverside's current load and energy requirements.

INTERROGATORY NO. 21:

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.

INTERROGATORY #21

Riverside does not intend to supply energy users other than itself, thus no such estimates have been made.

POOR ORIGINAL

1372 062

INTERROGATORY NO. 22:

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.

INTERROGATORY #22

No.

POOR ORIGINAL

1372 063

INTERROGATORY NO. 23:

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.

INTERROGATORY #23

Riverside objects to this interrogatory as premature.

POOR ORIGINAL

1372 064

INTERROGATORY NO. 24:

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.

INTERROGATORY #24

Yes, I am informed that PGandE has failed to negotiate interconnection arrangements in accordance with the Stanislaus Commitments with qualified entities such as NCPA, and DWR despite the good faith efforts of those utilities to obtain such agreements with PGandE.

POOR ORIGINAL

1372 065

INTERROGATORY NO. 62:

Please identify each occasion during the period 1960 to the 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.)

INTERROGATORY #62

Riverside objects to this interrogatory as being overbroad, unduly burdensome and not calculated to lead to admissible evidence.

1372 066

POOR ORIGINAL

INTERROGATORY NO. 63:

Please identify every direct or indirect payment by you during the period 1960 to the 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 members and associate members.)

INTERROGATORY #63

On behalf of Riverside, there have been no such payments.

POOR ORIGINAL

1372-067

INTERROGATORY NO. 64:

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.

INTERROGATORY #64

The rate making policy of the City of Riverside has been, and continues to be, based primarily on cost of service to the various customer class groups, with some modification, so as to respond to the needs of the community.

POOR ORIGINAL

1372 068