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87 FORSYTH ST., N.W.  
ATLANTA, GEORGIA 30303  
404/522-1934

July 17, 1979

Mr. Harold Denton  
Nuclear Regulatory Commission  
Phillips Building  
Room T 202A  
Washington, D. C. 20555

Re: Docket #50-424 &  
#50-425

Dear Mr. Denton:

The purpose of this letter is to supply additional documentation to the Georgians Against Nuclear Energy (GANE) Request for Reconsideration Petition which was filed with you on May 1, 1979. That petition asked the NRC to revoke construction permits which have been issued to the Georgia Power Company, the Applicant, for construction of two Nuclear plants, Vogtle 1 and 2. Gane believes that this is appropriate action for three reasons: misrepresentation by the Applicant, the requirements of the National Environmental Protection Act (NEPA), and changed circumstances. In the alternative, GANE requested the NRC to conduct hearings regarding these matters. In the two months since GANE filed its petition, certain additional documentation has become available. This documentation is described as it relates to misrepresentation to NEPA and changed circumstances.

The first instance of misrepresentation concerns the Applicant's claim that it needed the output of two Vogtle plants for Georgia customers. In reality, the Applicant was trying to sell portions of the Vogtle output in other states. Exhibit 1 is a May 14 letter from R. F. Ellis, President of Gulf Power to Charles R. Lowman, General Manager of Alabama Electric Cooperative, Inc. This letter indicates that Georgia Power discussed the sale of an interest in Vogtle with certain North Carolina Cooperatives as well as various Florida electric companies. Exhibit 1 is evidence that the Applicant intended to use less than the full output of the Vogtle plants to provide for its customers in the State of Georgia. This fact is contrary to Applicant's representations to the NRC that it needed the output of Vogtle to serve

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the Georgia Power Service Area.

Gane has requested more complete information on this matter from the Applicant and will forward it to the Commission upon receipt. In the event that the NRC does not consider this a sufficient basis to revoke the permit, GANE requests a full hearing on this matter. At the hearing, GANE would seek to show that the Applicant wilfully misrepresented its plans regarding the use of the Vogtle output.

The second instance of misrepresentation relates to the Applicant's testimony regarding conservation. On February 10, 1976, Mr. W. R. Hensley testified before the NRC on behalf of the Applicant about its conservation program. His testimony, already part of the record, is to the effect that the Applicant would take affirmative steps at load control and that the Intervenor's complaints regarding conservation were therefore misguided. In concluding his direct testimony, Mr. Hensley noted that the Applicant anticipated a savings of 950 MW through load management, and that this estimate was a reasonable and prudent management determination.

Since that time, without notifying the NRC, the Applicant had breached this undertaking. In recent testimony before the Georgia Public Service Commission, the Applicant's President, R. W. Scherer, referred all questions about load management to Mr. E. G. Ellingson. Mr. Ellingson conceded that the 950 MW is no longer a goal of the company. He stated that "the load control programs that we thought would be effective programs for us in the long run as possible ways of reducing megawatts, we no longer feel will do that." Relevant excerpts from the unofficial transcript of Mr. Scherer and Mr. Ellingson are attached as Exhibits 2 and 3. Mr. Ellingson did not explain why load control was not economical for the Applicant, but led to substantial savings in Cobb County, in Douglas, Georgia, and elsewhere in metropolitan Atlanta. (See the attached Exhibit 4, and Exhibit 1 of the Request for Reconsideration.)

The Applicant has not complied with the substance of its testimony to the NRC about load management; it has misrepresented its actions

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to the NRC. Moreover, if it has implemented a program, the Vogtle Plants would not be necessary.

Exhibits 1 through 4, attached to this letter, substantiate two examples of misrepresentation by the Applicant. Either manner of misrepresentation is a basis to revoke the construction permit. Revocation is appropriate because the Applicant knowingly deceived the NRC.

In the instant docket, the final Environmental Impact Statement (EIS) does not consider conservation as required by NEPA. Neither testimony at subsequent NRC hearings, nor the order of the NRC itself, can be deemed to modify this defect, unless circulated to the public and the relevant governmental agencies for comment. This circulation was not done to the knowledge of GANE. Zabel v. Tabb, 430 F. 2d 199, 213 (5th Cir. 1970), cert. den. 401 U. S. 910 (1971); Natural Resources Defense Council v. Calloway, 524 F. 2d 79, 92, 94.

The GANE petition describes a variety of circumstances that have changed, including the 1978 Energy Act, the escalation in the cost of nuclear fuel and projections of demand for electricity in the coming decade. Each of these factors have changed dramatically since the final EIS was approved in 1974. Accordingly, the NRC is under a NEPA duty to reconsider the environmental consequences of its decision in light of the changed circumstances. Libby Rod and Gun Club v. Poteat, 457 F. Supp. 1177 (Mont. 1978) holds the federal agency is under an obligation to reassess a project as new information becomes available. See also, Monarch Chemical Works v. Exon, 452 F. Supp. 493 (D. Neb. 1978). There, the City proposed a correctional facility with community development funding, but conditions changed after the issuance of an EIS. The court found a duty in the agency to consider the need for a supplemental EIS.

Compliance with NEPA does not cease upon preparation of an EIS. The author of an impact statement has an ongoing duty to review its continuing vitality in light of changing conditions. New developments may render the original EIS inadequate, in which case a supplemental impact statement is required. W. Rodgers, Handbook of Environ. Law.

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Similarly, in Environmental Defense Fund, Inc. v. Castle, 439 F. Supp. 980 (E.D.N. Y., 1977), the court applied the "harder look" standard on the basis of new information to fill an information gap in the final EIS.

In the instant docket, the NRC staff concluded that there was inadequate data or studies in existence to conclude that conservation could so reduce the projected need as to obviate the need for even one of the Vogtle plants (Feld testimony, at 38). While GANE disagrees with this judgment (e.g., the studies collected in Readings on Energy Conservation, Selected Materials Compiled by Congressional Research Service, Serial No. 94-1 (92-90)), GANE submits that there are certainly such studies available today.

The NRC should cancel the construction permits for the Vogtle plants until it has re-examined the need for two Vogtle plants. Such action will fulfill the NEPA duties in light of changed circumstances.

As a practical matter, the regulations of the NRC simply require it to consider changed circumstances and new information which develop after preparation of the Final Environmental Impact Statement. 10 CFR 512 requires the Applicant to report changes since the Final EIS and new information has developed. Section 51.21 envisions that this review will take place after the construction is substantially complete. However, in the instant docket, five years have elapsed since the EIS was prepared. Different circumstances and new information have already altered the balance against the construction of the Vogtle plants. It is wasteful to continue to authorize the expenditure of billions of dollars for construction if the facts now warrant the termination of construction. Rather than re-examine changed circumstances at the operating license stage, the Commission should conduct this review immediately, before additional funds are wasted.

Circumstances have changed substantially since the Final EIS was circulated in 1974. Today, conservation is recognized as the

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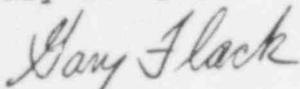
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cheapest method to meet our energy needs, while solar energy is a major part of our national energy policy. Each of these technologies was noted by President Carter in his July 15th address to the nation. The President also stressed the desirability of using our coal resources. Yet, the Applicant proposes to sell part of the new coal generated Scherer plants and decrease its conservation efforts. The new national energy program described by the President is a substantial change not considered by the NRC. If the national energy program applies to the Applicant, it would seem to require that the Applicant maintain full use of the Scherer plants, expand its use of conservation and solar technologies, and discontinue construction of the Vogtle plants. The President's position is in essence what GANE has been advocating to the NRC.

In conclusion, any one of the above-described conditions - the misrepresentation, the requirements of NEPA, or changed circumstances - would justify the NRC revoking the construction permits for Vogtle. At a minimum, these conditions warrant a full hearing before additional money is wasted on an unnecessary nuclear plant. This is particularly true in light of \$51.21. GANE urges the NRC to take action at this time and revoke the construction permits for Vogtle.

Very truly yours,



Gary Flack

GF/1

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MAY 17 1976

GULF POWER COMPANY

POST OFFICE BOX 1151

PENSACOLA, FLORIDA 32520

P. F. ELLIS, JR.  
PRESIDENT

May 14, 1976

Mr. Charles R. Lowman  
General Manager  
Alabama Electric Cooperative, Inc.  
Post Office Box 550  
Andalusia, Alabama 36420

Dear Mr. Lowman:

Your letter of April 22, 1976 to me in response to my letter of April 15, 1976 addressed to Mr. R. W. Scherer of Georgia Power Company was quite surprising in view of the fact that I did not send you a copy of that letter because you were not directly involved as far as Gulf Power Company is concerned. In retrospect, I think the recipients of your letter probably find it very helpful because you succinctly and vividly portrayed the problems we face in securing the cooperation of the four cooperatives who, based on your letter, may be looking to you for advice in this matter.

Gulf's representatives explained during the meetings held with our four rural electric cooperative customers that the opportunity for Gulf to participate appeared suddenly, due to the Municipal Electric Association of Georgia's decision to reduce the amount of its participation in the Vogtle Plant leaving approximately 30 percent of the capacity available for others. Further, this was not a matter that had been under lengthy consideration. We also explained that Gulf had no experience in the regulatory requirements involved in participation in nuclear power projects and that we were simply trying to meet a very tight time schedule which Georgia had prescribed as necessary to reactivate construction in time to meet a 1983 commercial operation schedule. We advised them that we were acting on advice of Georgia's counsel, who had considerable experience in such matters, that a waiver was probably the best means of expediting mandatory anti-trust reviews.

At no time have we ever indicated or intimated that the time element was not critical, as suggested in your letter. To have done so would have created, to paraphrase your letter, an "air of unreality."

We made it clear to the cooperatives that Gulf's participation in the Vogtle units would benefit all of Gulf's customers. We answered their questions concerning the cost of the

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EXHIBIT 1

R. F. ELLIS, JR. TO Mr. Charles R. Lowman  
Alabama Electric Cooperative, Inc.

SHEET No.2  
May 14, 1976

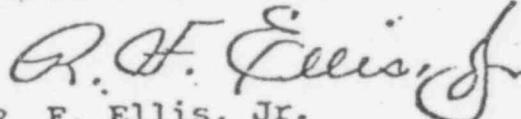
plant, etc., based on information we had. Our answers must have sufficed for we have had no requests for data or other information from any of our four cooperative customers.

My letter to Mr. Scherer of Georgia Power Company pointed out that the only response of the cooperatives had been one of noncommitment. As you apparently know, they all responded to the effect that they are not in a position to give us a response at this time. That fits my definition of noncommitment.

As to your statement concerning coordination of electric utilities, every operating electric supplier in the State of Florida has an invitation to join with other investor-owned municipal and cooperative entities in the Florida Electric Power Coordinating Group which began operating in October 1972 and represents 99+ percent of the electric generation and distribution facilities in the state. It was for such purposes FCG was formed and has been successfully operating for nearly four years.

Whether or not Gulf could still participate in the Vogtle units, I cannot say. I am informed Georgia Power Company has had discussions with North Carolina Cooperatives and Jacksonville Electric Authority and contacts by Florida Power & Light and Seminole Electric Cooperative. The capacity is needed by Gulf and the benefits to our customers apparently would have been considerable. I have no regrets for trying.

Yours very truly,

  
R. F. Ellis, Jr.

RFEjr:ccg

cc: Chairman W. T. Mayo  
Florida Public Service Commission  
700 South Adams Street  
Tallahassee, Florida 32304

Mr. M. J. Parish, III, Manager  
Choctawhatchee Electric Cooperative, Inc.  
Post Office Box 612  
DeFuniak Springs, Florida 32433

Mr. Henry F. Pruett, Manager  
Escambia River Electric Cooperative, Inc.  
Post Office Box 428  
Jay, Florida 32565

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1 Q (By Mr. Lackey) Have you had a chance to look at  
2 those two exhibits, Mr. Scherer?

3 A Yes, I have.

4 Q And do you see the column I was referring to in the  
5 '77 Exhibit 8 that is not in the other exhibit?

6 A Yes, I see it.

7 Q Do you have any explanation of why that column  
8 called "Load Management" was not included in the Exhibit 5  
9 that you have in front of you in Mr. Ellingson's testimony?

10 A I think Mr. Ellingson can address the question and  
11 probably answer it. My guess -- my thought would be that  
12 it may very well be rolled into some other of these columns,  
13 rather than separated out just as load management. That would  
14 be my judgment, but I am sure Mr. Ellingson can respond.

15 Q Is it your testimony that there was no policy de-  
16 cision to exclude load management?

17 A You mean in the preparation of this testimony?

18 Q Yes.

19 A There was no policy decision. The individual who  
20 is responsible for the testimony prepared it, and he can  
21 address it in any way that he feels is proper and prudent  
22 and, in fact, conveys as simply as possible what was done.

23 Q Is it your position or is it the position of  
24 Georgia Power Company now that load control devices, load man-  
25 agement control devices, are not a feasible way to influence

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1 long-run demand for electricity?

2 A Now, you're talking about positive load control  
3 devices, such as might be found at Cobb County EMC?

4 Q Yes, sir, as opposed to passive devices.

5 A I think Mr. Ellingson can very effectively address  
6 that subject.

7 COMMISSIONER KIMBROUGH: I don't think he is  
8 going to answer any of Mr. Ellingson's questions, and  
9 I don't know that on cross he would have to. So, I  
10 believe you better save them for Mr. Ellingson.

11 MR. LACKEY: I was asking him, sir, what Georgia  
12 Power's position was with respect --

13 COMMISSIONER KIMBROUGH: You can see he is not  
14 answering it. He is referring it back to Mr. Elling-  
15 son.

16 Q (By Mr. Lackey) Let me ask the question this way:  
17 Do you know what Georgia Power's position is with respect  
18 to load management control devices?

19 A We do not exclude any kind of a device that might  
20 be beneficial in reducing the requirements for building new  
21 plant. That is a definite policy statement. Now, the  
22 methodology that might be adopted to achieve that kind of  
23 goal can very well be addressed by Mr. Ellingson.

24 Q So, as a policy, Georgia Power is not opposed to  
25 load management control devices?

1 A As a policy, Georgia Power Company is in favor of  
2 any kind of device that will reduce the requirement to build  
3 new plant.

4 Q Now, that leads us to another subject. Is it  
5 not true that Georgia Power's cash flow is greater than its  
6 net income?

7 A I don't know. Mr. Scott could tell you that.

8 Q And is it not true that Georgia Power has a cash  
9 flow which results from investment tax credits and income  
10 tax deductions resulting from depreciation?

11 A It has cash flow from those items, yes, sir.

12 Q Is it not true that these cash flows are generated  
13 by construction projects of Georgia Power Company?

14 A To the degree that the investment tax credit is  
15 measured by the construction program, to the degree that  
16 depreciation is by virtue of plant being in service, yes,  
17 sir.

18 Q And if it became apparent that the Company did not  
19 need new plant, is it not true that this cash flow would  
20 cease?

21 A That particular cash flow related to investment  
22 tax credit would cease, but certainly depreciation would not.

23 Q Would depreciation decrease?

24 A No, it wouldn't increase, but it certainly wouldn't  
25 cease.

1 Q Looking at Exhibit 8, what did you forecast?  
2 A 10,093.  
3 Q What did you forecast in 1977 for the year 1978?  
4 A I don't have that number with me.  
5 Q Look on Exhibit 8.  
6 A That was not forecasted in 1977. That was forecasted  
7 in 1976. It was in the case that occurred during 1977.  
8 Q Well, I will change my question. What did you  
9 forecast for 1978 in the 1977 rate case?  
10 A 11,429.  
11 Q What was the actual for 1978?  
12 A 10,113.  
13 Q Would you agree, subject to check, that the 1978  
14 forecast as reflected in the 1977 rate case was over by  
15 13 percent over actual?  
16 A In which year?  
17 Q 1978?  
18 A Yeah, I will agree to that.  
19 Q I didn't hear you.  
20 A I said I agree with that.  
21 Q Okay. Isn't it true that in the last rate case, the  
22 company's econometric forecast was reduced by the anticipated  
23 effect of load management program?  
24 A There was a reduction to the load management, yes,  
25 sir.

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Q Are those not reflected on Exhibit .

A Yes, sir, they are.

Q The next to the last column on the right, right?

A Yes, sir.

Q Isn't it true that the Company's forecast in the current case does not reduce the econometric forecast for an anticipated effect of load management programs?

A That's not correct.

Q Would you show me on Page 54 of 61, Exhibit 77, where those reductions are?

A Those reductions are contained in the new factor adjustments.

Q I am talking about on Page 54 of 61, your Exhibit 77.

A Yes, sir.

Q Where are they in those columns reflected on that page of Exhibit 77?

A They are contained in the reductions due to price conservation and efficiency. They are not the same numbers that showed up in 1978.

Q Turn to page 14 of 61 of your Exhibit 77.

A I am sorry. I don't have that.

Q You don't have your prefiled testimony?

A I am sorry. In the previous case?

Q No, in this case.

1 A I thought you said previous case.

2 Q No, sir, I may have, but I didn't mean it. This  
3 case.

4 A Which page again?

5 Q Page 14 of 61, Exhibit 77.

6 A Okay.

7 Q Looking at the middle paragraph on Page . . of 61,  
8 Exhibit 77, you explain, do you not, in that paragraph  
9 following the capital C the changes that result in the third  
10 column from the right on Page 54 of 61 in Exhibit 77?

11 A That's right. That's right.

12 Q All right, sir. And would you please read aloud  
13 the third sentence beginning in the paragraph immediately  
14 following the capital C on Page 14 of Exhibit 77. It  
15 begins with the words, "These future --"

16 A "These future improvements in appliance and process  
17 efficiencies, additional insulation standards, new lighting  
18 standards, conservation ethics and tariff schedules can be  
19 expected to change the relationship between electricity  
20 demand and the independent variables, gross state product  
21 and total personal income."

22 Q Okay. I want to ask you to take a look at a  
23 certified copy of your testimony in the last rate proceeding  
24 beginning at Page 15 and extending through Page 22 which I  
25 will ask the reporter to mark as Exhibit 85. Is that correct,

MR. PRICE; Yes, sir.

(Exhibit 85 was marked for  
identification.)

Q (By Mr. Bowers) Look over on Page 18.

A Yes.

Q Beginning at Line 20, would you read the first  
sentence reflected there beginning on Line 20, Page 18 of  
Exhibit 85.

A "Future major improvements in appliance and industrial process efficiencies, additional installation standards, new lighting standards, the conservation ethic and rate schedules designed to reduce load are probably the most significant new developments that can reasonably be expected to affect future peak load growth."

Q Does that sentence not relate to that column in Exhibit 8 labeled "Reduction Due to Conservation Price and Improved Efficiency"?

A It does.

Q Is that not the same heading that appears in the third column from the right on Page 54 of 61 of the current Exhibit 77?

A Correct.

Q Aren't those identical?

A No, they are not, and I might elaborate a little

J R. PRICE

CERTIFIED COURT REPORTER  
654 CUMBERLAND ROAD, N.E.  
ATLANTA, GEORGIA 30308

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so that you will understand what has happened in the forecasting process at Georgia Power Company.

3 The 950 megawatts that was listed in the last case as  
4 improvements due to load management is a number that was  
5 predicated not only upon what we saw as economic growth in  
6 the State, but also some programs that we were looking into  
7 at that time at Georgia Power Company.

8 First of all, Line 50 would have to be reduced simply  
9 because some of the programs, particularly the Answer House,  
10 new insulation standards on new buildings, improvements in the  
11 commercial sector that we are looking for, won't occur simply  
12 because those new customers won't occur.

13 So the 950 megawatts would have to be reduced considerably  
14 just for that.

15 Secondly, the load control programs that we thought  
16 would be effective programs for us in the long run as possible  
17 ways of reducing megawatts, we no longer feel will do that.

18 And in addition, we have, as I mentioned earlier, increased  
19 our percentage turndown due to new factor improvements  
20 about -- well, eight-tenths of a percent out of four in  
21 1983, which in this case is about a fifth, 20 percent,  
22 increase in the turndown, and the turndown itself is smaller  
23 only because our load forecast is now smaller.

24 So, some of the things that were in the 950 are gone,  
25 simply because the growth isn't there and some of the programs

have been reevaluated.

2 The rest of it is included in our new factor improve-  
3 ments in additional relative amount to the forecasted loads.  
4 That is why I am stating that the load management program and  
5 our efforts at thermal envelope efficiency improvements, in  
6 particular, the Answer Houses, our work on trying to get older  
7 retrofitted and our outreach programs with low-income people  
8 are all directed at improving thermal envelope, and we are  
9 reducing consumption, not only at the peak but year-round.

10 Q You don't dispute that the description of the  
11 reductions reflected in the '77 case and those reflected in  
12 this case for reductions due to conservation, price, improved  
13 efficiency are described using precisely the same words;  
14 isn't that correct?

15 A I think if you will read the documentation of the  
16 last forecast, rather than just the testimony, which was  
17 submitted as working papers --

18 Q First, I will ask you to be responsive to my  
19 question.

20 A I am.

21 Q Just say yes or no or I don't know, and then you  
22 can explain.

23 A My explanation will show you that I don't have to  
24 say no.

25 CHAIRMAN PAFFORD: Just a minute, Mr. Bowers. I

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asked you, Mr. Ellingson, to respond to the question, to be responsive.

THE WITNESS: All right. My answer is no at the moment.

CHAIRMAN PAFFORD: His answer was no.

THE WITNESS: And I will explain.

Q (By Mr. Bowers) Your answer is no; is that correct?

CHAIRMAN PAFFORD: Just a minute, Mr. Miller?

MR. MILLER: Mr. Chairman, I believe you were going to give Mr. Ellingson the opportunity to explain.

CHAIRMAN PAFFORD: If he wants to explain his answer of no, he will have the opportunity to explain, Mr. Bowers. His answer was no.

Do you wish to explain your answer?

THE WITNESS: Yes. On the last forecast, the documentation we sent to the staff on Page 24 as a working paper that explained the development and derivation of our forecast stated right in the middle of Page 24 that the forecast does not incorporate the effects of any future Georgia Power load management effort.

What I am telling you now is our forecast does, and those future conservation improvements do. That is why they are not identical.

Q (By Mr. Bowers) But the words that describe the

1 column labeled "Reductions Due to Price, Conservation and  
2 Efficiency" for 1979 and '77 are identical, are they not?

3 A Reading the documents, but reading the documents  
4 they mean something different. They include our load  
5 management efforts now; they did not then, as stated  
6 explicitly in the documents that were submitted to the staff  
7 then and the ones that are submitted now.

8 Q Your answer is yes, the words are identical?

9 A The words are identical. The meanings behind  
10 the words if one looks into the research and the work that  
11 lies behind the tables shows that they are different. The  
12 meanings are different.

13 Q Would not the inclusion of the effects of load  
14 management as contemplated in the 1977 rate case further  
15 reduce the Company's forecast in this case?

16 A Are you asking me if those load management programs  
17 are possible and that we should include them?

18 Q No, that is not what I asked you at all.

19 Would not the effects of load management contemplated for  
20 the 1977 case, if incorporated into this case, further  
21 reduce the forecast which you have in this case?

22 A As we would interpret the 950 now or then?

23 Q My question is just mathematical.

24 A I know it is just mathematical.

25 CHAIRMAN PAFFORD: Just a minute. We are not

1 going to have any arguing, and when he asks the  
2 question, you respond to it if you can.

3 THE WITNESS: Okay.

4 CHAIRMAN PAFFORD: We are not going to have an  
5 argument.

6 MR. BOWERS: I will reask it.

7 Q (By Mr. Bowers) Would you not agree that if I  
8 took the effects of load management as contemplated in 1979,  
9 as reflected in the second column from the right of Exhibit 7,  
10 and incorporated those into the load projections made on Page  
11 54 of 61, Exhibit 77, that I am going to reduce the total  
12 system load reflected in the second column from the right  
13 of Page 54 of Exhibit 77?

14 A You can do any subtractions you'd like, and you  
15 will come up with those numbers; but I would not agree with  
16 that subtraction.

17 Q Please answer my question.

18 A I just did.

19 Q Would you not reduce the peak forecast by doing  
20 that?

21 A I would not, no.

22 Q We must have gone to a different school to add and  
23 subtract then.

24 Hasn't the Company asked this Commission for permission  
25 to institute a time-of-day pricing rate structure?

# Beating the Peak Saves Dollars All Year

By PLU TRIBBLE

Journal Staff Writer

**Peak Power Period. That's the vital phrase.**

Peak Power Period determines how much consumers pay for electricity and how much power capacity a utility company must build.

For the entire state, there is one peak power period, the one time of the year consumers use more electricity than any other.

It's that long hot summer day when, somewhere between 3 and 6 p.m., everyone with air conditioners turns them on and sends meters whirring at high speeds.

To make sure there is enough electricity for that one all-consuming day, power companies must build generators with the capacity to provide for the peak. And the companies charge electric rates based on the extreme use to cover the cost of building the generators.

The only way to fight this is to shave the peak power demand. And no one is working harder at shaving, cutting back on the amount of electricity used on humid sweltering summer days, than the 50 electric cities in the state.

Of the cities in the state that sell electricity, The Journal contacted 13 in the metro area to find out how they go about reducing the demand of their customers during the seven or eight days of summer the peak period could occur.

Among these 13 cities, only three have formal load management systems, systems that can be activated to control air conditioners throughout their electrical territories.

East Point, with the largest number of customers among the three, 1,600, is entering

its third season with a system that controls 2,650 air conditioning units.

Ken Vanderslice, city manager, estimates that East Point has saved approximately \$130,000 each year since the system was activated and he estimates the savings will be approximately the same this year as the city shaves peak power demands.

The Municipal Electric Authority of Georgia, an organization of 46 power cities and one county system, alerts its members that a peak period is approaching and those with load management systems put them into effect.

Vanderslice says what happens is that the system turns off the compressors on air conditioning units for about seven minutes every 45 to 50 minutes.

Don Martin, superintendent of utilities for Lawrenceville, which also has a load management system, says their customers usually don't know when the compressors are turned off because the fans in the air conditioners keep running.

"So far we have had no complaints about our system which we installed last year. It's hard to come up with a dollar figure but we estimate we will save more than \$100,000 this year by shaving our peak power demands," Martin says.

Lawrenceville plans to expand its system to include appliances such as water heaters, Martin said. And East Point is in the process right now of adding 250 more switches to control that many more air conditioners.

College Park installed its load management system in 1978 and is pleased with the savings it has made in the use of power.

Don Stone, city manager, says he estimates the savings last year through shaving to be around \$137,000. College Park's system controls around 1,000 units.

"The best part of the savings is that we can pass this along to our customers," Stone says. "What it means is that we have not had to go up on our electrical rates. It has stabilized them."

Three of the other power cities are in the process of planning for installation of formal systems with Covington trying to beat the peak day this year.

City Manager Frank Turner said he hopes Covington's system, which will control only governmental units at the present time, should be installed in time for the peak period. He anticipates this will save up to \$50,000 a year once it is installed.

"Then I hope we will be able to afford to expand the system to include business, industry and individual residents. If we do expand the system to include these, I would anticipate the savings would be four times that much."

Of the three hope-to-have systems cities, Marietta is by far the largest in terms of customers. Jack Crane, city manager, says the city has some 24,000 electric customers.

Marietta has just taken bids for a load management system and Crane says he expects it to be installed in time for next summer.

Meanwhile, the city has been making some effort at shaving without the use of a formal system. However, Crane thinks the effort has made no difference.

The city, the school board and the housing authority have been working together turning

off air conditioning units during expected peak periods, but in a system this big, it doesn't amount to much of a large scale.

Although a small system with only 4,800 customers, the Newnan Sewerage, Water and Light Commission expects to have a load management system by next summer, according to Ralph Chatham, electric superintendent.

"In the meantime, we try to run the water plant during off peak hours and to cut back about a couple of volts at our substations," he says. "We have managed to keep the peak load demand down this way."

The remaining cities fight the peak power period through a variety of informal ways that have often been effective.

Cartersville estimates it has saved about \$50,000 during the past two years as a result of the hard work of the Cartersville Woman's Club.

Ralph Oglesby, superintendent of the electrical system, said Cartersville is lucky to have a woman's club interested in energy conservation. The women initiated the program two years ago and they are still doing most of the leg work, Oglesby said.

Each summer the women blitz the newspaper with stories explaining the program, send notices to the city's customers and notify the radio stations when a peak period is approaching.

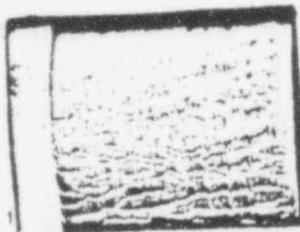
In addition, the city has installed flashing lights at each of its four shopping centers that warn businessmen when a peak period is approaching.

"Our program is completely voluntary

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and we have received excellent cooperation," Oglesby says. "We also ask our 5,200 customers to stagger loads. For example, not to use clothes dryers or do heavy cooking at our peak periods, in addition to turning off air conditioners."

Palmetto, a small city with a small system, 830 customers, has been able to maintain electrical rates because of voluntary cooperation and because it redistributed its electrical load — evened out the number of customers per line.

Roy Sneed, superintendent of the electrical department, says he does not have a dollar figure, but "we are maintaining our electrical rates because we cut our peak load last year."

Norcross has found it helpful to discourage athletic events during peak power periods, says Doug Wood, the Gwinnett County city's electrical engineer.

"When the temperature goes above 90 at night, we discourage athletic events and most of the time people are willing to postpone or cancel games. Even little league. The only time it gets tricky is during tournament time."

The city also encourages its residents to buy high efficiency appliances and to insulate all they can. In addition, they try to educate their people to what the peak power demand means, according to Mayor Lillian Webb.

Their efforts are working. Last year they cut their peak demand.

Jackson, in Butts County, has not had an electrical rate increase in three years, basically because it works with its four major industries.

Lewis Freeman, city administrator, says he contacts the industries when a peak demand period is approaching and they cut off their air conditioners an hour earlier in the afternoon and start them an hour later in the mornings.

"So far we have been able to handle load management by doing this. We have only 1,350 customers and this hasn't become a problem for us yet."

Fairburn is trying to keep down its peak demands by "word-of-mouth," according to the city manager, Alex Howell Sr. However, this

hasn't worked too well. Its peak demand was up last year, but the city did not go up on its rates, Howell said.

He admits it's hard to convince the city's many apartment dwellers not to turn on the air when they get home at 5 in the afternoon.

On the other hand, when MEAG calls Buford that a peak period is imminent the city turns off the water plant pumps and puts its sewerage plant on a standby generator.

City Manager Bobby Kerlin says it's impossible for smaller cities to get a dollar figure on how much they save, but that Buford is saving by following these simple steps.

Acworth, a small city in north Cobb which is not a member of MEAG, is launching a program July 1 to cut back on its peak load.

Mayor Ralph Coolidge says the city is educating its residents by providing them with tips put out by Georgia Power on how to cut peak load demands and will begin July 1 giving short blasts of the civil defense siren to warn people when a peak period is approaching.

"We also are installing lights at the main thoroughfares throughout the city that will flash to indicate the approach of a peak period."

In addition, Jan Petrys, councilwoman, will call the heavy industrial users and ask for their cooperation in cutting back on power during the crucial periods.

Don Stokley, MEAG general manager, put the energy saving, money saving load management into perspective with some dollar figures for last year's shaved peak period last year.

At 6 p.m. June 28, 1978, the peak power demand hour for the entire state, he estimates that the 47 members of MEAG shaved about 70,000 kilowatts off the previous year's demand.

"Putting a dollar figure on that, you come up with a minimum savings of around \$2.5 million for the year among the 47 systems that belong to MEAG. Just by reducing the peak demand."

## Electricity Savers Will Get Refund

DOUGLAS — Customers who cooperated in an electric power conservation program here will get a refund on their power bills this year, according to Joe Solomon, head of the municipally operated electrical utility.

Solomon recommended to the Douglas City Commission this week that power customers who volunteered to put management switches on their air conditioning units be allowed to share in the city's savings.

He said that over 500 industrial and residential customers had the switches installed last year. This enabled the city during peak demand periods to shut off the controlled air conditioning units on a rotating basis for seven minutes out of each 28-minute period.