

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

In the Matter of:)
)
Pacific Gas and Electric Company)
(Stanislaus Nuclear Project,)
Unit No. 1))
_____)



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

Pacific Gas and Electric Company (hereinafter "PGandE") hereby serves the following fifth set of interrogatories to Northern California Power Agency (hereinafter "NCPA") and Department of Water Resources (hereinafter "DWR") and the fourth set of interrogatories to the Cities of Anaheim and Riverside (hereinafter "Cities"), to be answered fully and separately in writing and under oath, as provided in Rule 2.740(b) of the Rules of Practice of the Nuclear Regulatory Commission.

The terms used herein shall be defined according to the definitions set forth in PGandE's fourth set of interrogatories propounded to the Department of Water Resources and third set of interrogatories propounded to NCPA and the cities of Anaheim and Riverside, dated January 25, 1979, with the following additions:

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7909250174;

1. "Off-Peak" refers to times or periods during which overall demand for electric energy in California is relatively low.

2. "On-Peak" refers to times or periods during which overall demand for electric energy in California is relatively high.

3. "SWP" means the State Water Resources Development System pursuant to the Central Valley Project Act (Water Code Section 11100 et. seq.) and the State Water Resources Development Bond Act, commonly referred to as the Burns-Porter Act (Water Code Sections 12930 et. seq.)

The interrogatories in Part A, below, are addressed to all intervenors; the interrogatories in Part B, below, are addressed only to the intervenor DWR; the interrogatories in Part C, below, are addressed only to intervenors NCPA and Cities; and the interrogatories in Part D, below, are addressed only to intervenor NCPA.

PART A

INTERROGATORY NO. 1:

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, contract, 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;

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

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

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

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

(i) the source or author of the report;

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

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

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

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

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

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 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 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.)

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 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 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 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

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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 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.

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 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 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.)

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 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 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 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.

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 NO. 18:

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.

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 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 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 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 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 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.

PART B (TO DWR ONLY)

INTERROGATORY NO. 25:

Please describe the efforts of DWR to construct transmission lines which are referred to at p. 4 in your Petition to Intervene herein, and indicate what PGandE did in each instance to "discourage" you from such construction.

INTERROGATORY NO. 26:

Please identify the "other California utilities" whom you have alleged were refused permission to join the California Power Pool (p. 5, DWR Petition to Intervene).

INTERROGATORY NO. 27:

Please describe the efforts you have made, if any, to cancel the contract between you, PGandE, the Los Angeles Department of Water and Power, Southern California Edison and the San Diego Gas and Electric Company, which is commonly referred to as the Suppliers Contract.

INTERROGATORY NO. 28:

Please identify every request you have made to the other parties to the Suppliers Contract, or any of them, for permission to develop thermal electric generating resources, which request has been denied.

INTERROGATORY NO. 29:

Please describe any efforts you have made to obtain permission to compete "with the suppliers in the sale of bulk power" (p. 6, DWR Petition to Intervene), including any requests you have made to the supplying companies, or any of them, for such permission, and state what bulk power you have had available for sale which you have been unable to sell or use in the manner you believe most efficient.

INTERROGATORY NO. 30:

Please state all circumstances regarding the Suppliers Contract of which you now complain but which you did not contemplate at the time you entered the Contract.

INTERROGATORY NO. 31:

State in full the method by which DWR determines reserve requirements, indicating the method of computation,

the specification of all values selected by DWR and the basis for selecting each such value.

INTERROGATORY NO. 32:

In determining the price DWR charges its water customers, by what method (i.e., cost, fair market value, etc.) does DWR value the energy it uses in delivering the water to its customers?

INTERROGATORY NO. 33:

Does DWR make any distinction in the price it charges its water customers based upon different geographical delivery points? If so, please describe the basis upon which such distinction is made, and whether it is made in all situations.

INTERROGATORY NO. 34:

Please state your latest forecast of DWR's maximum On-Peak capacity, Off-Peak capacity and total energy requirements for each month of every year from now through the year 2000. If a range of possible future requirements is being considered, also state the upper and lower forecasts and state the potential circumstances upon which these limits are based.

INTERROGATORY NO. 35:

Do the capacity and energy requirements forecasted in response to the preceding interrogatory include loads other than SWP pumping requirements and related transmission and other losses?

INTERROGATORY NO. 36:

If the answer to the preceding interrogatory was in the affirmative, identify:

- (a) SWP loads which relate to pumping requirements;
- (b) SWP loads which do not relate to pumping requirements;
- (c) The loads of other entities which are included in DWR's requirements forecast or forecasts, identifying each such entity and the load forecasted for it.

INTERROGATORY NO. 37:

Does DWR have any plans or proposals to include in its forecast or forecasts of DWR's annual capacity and energy requirements either (1) loads other than SWP pumping requirements or (2) loads of other entities?

INTERROGATORY NO. 38:

If the answer to the preceding interrogatory was in the affirmative, identify:

- (a) Each such load and its location;
- (b) The reason or basis for inclusion or consideration for inclusion in DWR's forecast or forecasts of capacity and energy requirements;
- (c) Each and every person who has knowledge of the facts relating to the inclusion of such loads in DWR's forecast of capacity and energy requirements and, for each, the facts you believe the person knows;

(d) All documents referring to or relating to the inclusion of such loads in DWR's forecast or forecasts of capacity and energy requirements.

INTERROGATORY NO. 39:

Does DWR have the ability to concentrate its pumping requirements during Off-Peak periods?

INTERROGATORY NO. 40:

If the answer to the preceding interrogatory was in the affirmative, identify:

(a) The manner in which such ability was considered with respect to the forecast or forecasts presented in response to Interrogatory (1) above;

(b) Any additional reductions in DWR's On-Peak capacity requirements which you believe might be possible if additional energy were available during Off-Peak periods, and it was to DWR's economic advantage to make such On-Peak reduction;

(c) The daily and weekly number of hours considered by DWR as On-Peak in making its forecasts;

(d) Describe further reductions in DWR's On-Peak capacity requirements which you believe might be possible if the daily and weekly On-Peak hours used in (c) above were reduced and the same Off-Peak capacity requirement is maintained;

(e) If the answer to Interrogatory 40(d) is that there is no reduction, explain in detail why.

INTERROGATORY NO. 41:

Describe fully and completely DWR's program for the use of existing and proposed DWR generation capability, power purchases, exchange arrangements and capacity and energy from any other sources in meeting its capacity and energy requirements presented in the response to Interrogatory No. 34 above, including target on-line dates. Such program should show the dependable capacity and total energy available from each resource or power transaction for each year of the forecast or forecasts. The basis for determining the dependable capacity rating of resources, especially hydro, should also be fully explained.

INTERROGATORY NO. 42:

If DWR is presently investigating, or has budgeted funds for investigating the potential development of additional resources, joint projects or power transactions with others which are not included in the program presented in response to the preceding interrogatory:

- (a) List such resources or development programs;
- (b) Indicate target dates for inclusion in DWR's resource program;
- (c) State the potential impact such additional resources might have on the program presented in response to Interrogatory No. 41 above.

INTERROGATORY NO. 43:

Identify the quantity of capacity which is included in the resource program presented in the response to Interrogatory No. 41 above for the purpose of providing capacity reserves.

INTERROGATORY NO. 44:

State the basis for the quantity of capacity reserve identified in the response to the preceding interrogatory.

INTERROGATORY NO. 45:

If the program presented in the response to Interrogatory No. 41 above includes purchases of capacity and/or energy from others, list each such entity and the amount of capacity and/or energy to be purchased. If firm arrangements have not been made for such purchase, so indicate, but give your best estimate of what such transactions will involve.

INTERROGATORY NO. 46:

If the program presented in the response to Interrogatory No. 41 above includes capacity and/or energy exchanges with others, list each such entity, the quantity of capacity and/or energy DWR anticipates receiving under the arrangement, and the general nature of the arrangement.

INTERROGATORY NO. 47:

If the program presented in the response to Interrogatory No. 41 above includes DWR participation in power projects of others, list each such entity and project, the

extent of DWR's participation and the status of the joint project.

INTERROGATORY NO. 48:

If the program presented in the response to Interrogatory No. 41 above contains quantities of capacity and/or energy which are surplus to DWR's requirements or if DWR anticipates that surpluses are likely from time to time, list such capacity and/or energy surpluses, whether such surpluses are On-Peak, Off-Peak or both, the basis of what is On-Peak and Off-Peak, all arrangements which DWR presently has or anticipates having for the use or disposition of all or portions of such surplus and the manner in which DWR anticipates disposing of any remaining surplus.

INTERROGATORY NO. 49:

Has DWR been invited to participate in current power projects proposed by others which you have not included in the program presented in the response to Interrogatory No. 41 above?

INTERROGATORY NO. 50:

If the answer to the preceding interrogatory was in the affirmative, identify:

(a) Each such project and the entity sponsoring such project;

(b) The reasons that such projects or proposals were not included in DWR's program;

(c) Each and every person who has knowledge of the facts upon which you base your evaluation of such projects or proposals and, for each, the facts you believe the person knows;

(d) All documents referring to or relating to any facts which form the basis of and/or support your evaluation of such projects or proposals.

INTERROGATORY NO. 51:

Has DWR been invited to enter in any capacity and/or energy exchange arrangements with others which you have not included in the program presented in the response to Interrogatory No. 41 above?

INTERROGATORY NO. 52:

If the answer to the preceding interrogatory was in the affirmative, identify:

(a) Each such arrangement or proposal and the entity which proposed the arrangement;

(b) The reason or reasons that such arrangements or proposals were not included in DWR's program;

(c) Each and every person who has knowledge of the facts upon which you base your evaluation of such arrangement or proposal and, for each, the facts you believe the person knows;

(d) All documents referring to or relating to any facts which form the basis of and/or support your evaluation of such projects or proposals.

INTERROGATORY NO. 53:

Does DWR believe that construction of new transmission facilities will be required in order to serve the future loads which were considered in the forecast or forecasts presented in response to Interrogatory Nos. 34 or 35 above?

INTERROGATORY NO. 54:

If the answer to the preceding interrogatory was in the affirmative, identify:

(a) Each new transmission facility which you believe will be required;

(b) The reason or reasons that each such new facility will be required;

(c) Each and every person who has knowledge of the facts upon which you base the need for such facilities, and, for each, the facts you believe the person knows;

(d) All documents referring to or relating to any facts which form the basis of and/or support the need for such facilities.

INTERROGATORY NO. 55:

Does DWR believe that construction of new transmission facilities will be required in order to make efficient use of the generation capability considered in the response to Interrogatory No. 41 above?

INTERROGATORY NO. 56:

If the answer to the preceding interrogatory was in the affirmative, identify:

(a) Each new transmission facility which you believe will be required;

(b) The reason or reasons that such new facilities will be required;

(c) Each and every person who has knowledge of the facts upon which you base the need for such facilities and, for each, the facts you believe the person knows;

(d) All documents referring to or relating to any facts which form the basis of and/or support the need for such facilities.

INTERROGATORY NO. 57:

Please identify by type, location and the name and address of the owner, each source of power located in the Pacific Northwest which DWR has attempted to obtain for use after the termination of its Canadian Entitlement Power and, as to each such source, please indicate whether it is firm or not, the amount and the expected term of the contract.

INTERROGATORY NO. 58:

Please identify by type, location and the name and address of the owner, each source of power located outside of the Pacific Northwest (excepting PGandE) which DWR has attempted to obtain for use after the termination of its

Canadian Entitlement Power and, as to each such source, please indicate whether it is firm or not, the amount and the expected term of the contract.

INTERROGATORY NO. 59:

Does DWR presently expect to use after 1983 the 300 megawatts of Intertie Capacity it is now purchasing from the California Companies? If so, please state your best estimate of the amount of such capacity which DWR will use after 1983, at what capacity factor its use of such capacity will be, what plans, if any, DWR presently has for the disposition of the Intertie Capacity it does not plan to use after 1983, and whether DWR plans to pay after 1983 for the amount of Intertie Capacity it does not plan to use after 1983.

INTERROGATORY NO. 60:

In your response to Interrogatory No. 1 in PGandE's second set of interrogatories to you, you refer to repeated requests by DWR for technical information related to the proposed Stanislaus Project. Please describe

(a) The manner in which each said request was made and its date.

(b) The "technical information" sought by the requests listed in response to 2.E.

INTERROGATORY NO. 61:

In your response to Interrogatory No. 9 in PGandE's second set of interrogatories to you, you referred to a

"net annual power requirement in excess of six billion kilowatt hours at project completion;" please list:

(a) All components of the State Water Project not yet completed whose completion is assumed in the 6 billion kwh figure.

(b) Of the components listed in (a) above, list each that is currently in the process of construction and its estimated completion date.

(c) For any component listed in (a) above which is not currently in the process of construction, describe all steps necessary for its completion and the estimated completion date.

PART C (TO NCPA and Cities ONLY)

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 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 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.

PART D (TO BE COMPLETED ONLY)

INTERROGATORY NO. 65:

Please identify the "responsible officers" of NCPA and of each of its members and associate members with whom counsel for NCPA conferred to comply with the interim

order for preservation of documents and records issued by the Board in this case on May 26, 1977, and for each "responsible officer" who is no longer employed by the entity of which he was a "responsible officer," please identify (a) the individual's successor and (b) the individual's current or last known business and residence address.

INTERROGATORY NO. 66:

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

INTERROGATORY NO. 67:

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

INTERROGATORY NO. 68:

Please describe separately for NCPA, each of its members, associate members and NCPA's general counsel all

documents, files or other materials which were determined not to be "arguably . . . relevant to any issue or sub-issue raised by any party to this proceeding." For this purpose, the documents, files or other materials may be described by categories, as indicated in Interrogatory No. 66, above.

INTERROGATORY NO. 69:

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

INTERROGATORY NO. 70:

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

INTERROGATORY NO. 71:

Please identify each alternate source of bulk power which you believe was available to you or any of your members or associate members during any of the "long-term

all-requirements contracts" to which you refer in paragraph 7a of your Petition to Intervene in this case. As to each such alternate source, please state the identity of the source, the amount and type of power available, the time period and the price.

INTERROGATORY NO. 72:

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

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

Please identify those entities whom you believed or assumed would have been able and willing, in or prior to 1970, to purchase or agree to purchase SMUD's surplus power on terms

and conditions more favorable to SMUD than those contained
in the PGandE-SMUD contract.

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By WILLIAM H. ARMSTRONG
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Dated: July 19, 1979

cc: All Parties on Service List

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CERTIFICATE OF SERVICE BY MAIL

Mary Tobias certifies that she is not a party to the within cause; that her business address is Three Embarcadero Center, San Francisco, California 94111; and that she caused an envelope to be addressed to each of the following named persons, enclosed and sealed in each envelope a copy of the foregoing document(s) and deposited each envelope with postage thereon, fully prepaid, in the United States mail at San Francisco, California on July 19, 1979.

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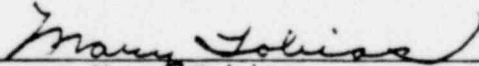
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