

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the matter of:)
The Cincinnati Gas & Electric)
Company, et al.) Docket No. 50-358
(William H. Zimmer Nuclear)
Power Station))

INTERVENOR MIAMI VALLEY POWER PROJECT'S
INTERROGATORIES TO APPLICANT REGARDING CONTENTION 13.

Intervenor Miami Valley Power Project (MVPP) hereby propounds the following interrogatories to Applicant to be answered fully in writing, under oath, within fourteen (14) days after service hereof in accordance with the following instructions:

1. "Please specify" shall mean give all data, calculations and assumptions used in formulating the answer.
2. These interrogatories request all knowledge or information in the possession of Applicant and/or in the possession of Applicant's agents, representatives, and, unless privileged, attorneys.

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1. Please specify each design, construction, engineering, safety, quality, installation, or other problem contributing to the delay of the fuel loading date of the Zimmer Station announced by CG&E in July, 1979.
2. CG&E has stated that these delays will increase the total cost at the Zimmer project to \$850 Million, \$186 Million beyond the previous estimate. Please specify the means by which this additional money will be raised, (eg., stock issuance, loans, bond issuance, etc.). For each method employed, please specify quantities, amounts, interest rates, and what percentage of the total increase in the Zimmer construction costs has been or will be obtained through each means identified.
3. Specify the schedule for amortization for each of above newly incurred debts for each applicant.
4. Please specify any anticipated changes in the total amount of stock dividend payments for each of the next five years for each applicant.
5. Please specify a revised schedule for amortization of the total capital indebtedness incurred for each applicant resulting from the construction costs at the Zimmer Station.
6. Please specify the amounts and the percentages of the increased costs mentioned above that has been or will be met by funds obtained by means of deferred income tax credits.
7. Please specify the amounts and percentages of the above mentioned costs to be met by funds obtained by means of construction

work in progress (CWIP) charges. Please indicate if the availability of any of these anticipated CWIP revenues is still pending Public Utilities Commission of Ohio decisions.

8. Please specify a revised schedule for payment of total deferred income tax obligations resulting from the costs of construction at the Zimmer Station for each applicant.

9. Please identify probable and reasonable sources of revenue for paying the above specified deferred income tax obligations for each applicant.

10. Please state, in a clear affirmative or negative declarative statement, whether funds from CWIP charges on current, planned, or future construction will be or are anticipated to be used in meeting some deferred income tax obligations.

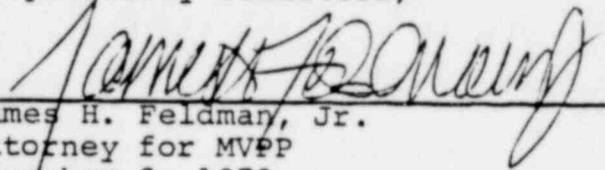
11. Identify and estimate for each of the first 5 years of operation any increases in labor costs, fuel costs, fuel receiving, loading, storage or disposal costs, maintenance costs, materials costs, equipment costs, or other operating costs which result from the problems identified in the answer to question #1. Please attach a revised operations and maintenance cost schedule.

12. Identify and estimate for each of the first 5 years of operation all equipment, safety, security, operating and maintenance cost increases resulting from NRC or Kemeny Commission recommendations or requirements stemming from the Three Mile Island investigations.

13. Estimate in dollar amounts, a revised schedule for depreciation costs for the Zimmer Station plant and equipment as they have

been, are being, or will be presented to the Internal Revenue Service in computations of the federal income tax obligations of each applicant for the anticipated service life of the Zimmer Station.

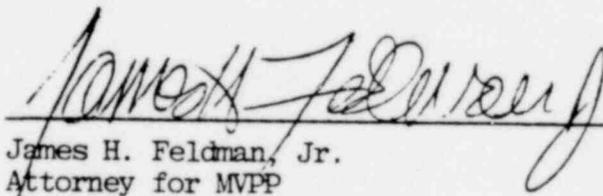
Respectfully submitted,



James H. Feldman, Jr.
Attorney for MVPP
November 8, 1979

CERTIFICATE OF SERVICE

I hereby certify that copies of the above Interrogatories have been sent to all parties on the service list by ordinary U.S. mail on the ninth day of November, 1979.



James H. Feldman, Jr.
Attorney for MVPP