



LAW OFFICES
SPIEGEL & McDIARMID
2600 VIRGINIA AVENUE, N.W.
WASHINGTON, D.C. 20037
TELEPHONE (202) 333-4500
TELECOPIER (202) 333-2974

GEORGE SPIEGEL
ROBERT C. McDIARMID
SANDRA J. STREBEL
ROBERT A. JABLON
JAMES N. HORWOOD
ALAN J. ROTH
FRANCES E. FRANCIS
DANIEL I. DAVIDSON
THOMAS N. McHUGH, JR.
DANIEL J. GUTTMAN
PETER K. MATT
DAVID R. STRAUS

BONNIE S. BLAIR
ROBERT HARLEY BEAR
THOMAS C. TRAUGER
JOHN MICHAEL ADRAUNA
CYNTHIA E. COLORADO
(MASSACHUSETTS BAR ONLY)
GARY J. NEWELL
MARC R. POIRIER

January 31, 1979

Jon C. Wood, Esquire
W. Roger Wilson, Esquire
Matthews, Nowlin, Macfarlane & Barrett
1500 Alamo National Building
San Antonio, Texas 78205

Re: Houston Lighting & Power Co., et al.
(South Texas Units No. 1 & No. 2)
NRC Docket Nos. 50-498A, 50-499A

Gentlemen:

Enclosed is a copy of the Initial Interrogatories to and First Request for Production of Documents by the City Public Service Board of San Antonio, Texas from the Public Utilities Board of the City of Brownsville, Texas, in Houston Lighting & Power Co., et al., (South Texas Units No. 1 & No. 2), NRC Docket Nos. 50-498A, 50-499A.

You will also find enclosed copies of interrogatories and document requests by the Public Utilities Board of the City of Brownsville, Texas to other parties in the South Texas proceeding.

In drafting these requests we have tried to take account of the production that has already occurred in this and related cases, so as to avoid duplicative requests. Should you feel that a particular request covers the same ground as one to which San Antonio has previously responded, please telephone me to discuss the problem. I would also be glad to answer any other questions you may have about any part of this request.

Very truly yours,

Marc Poirier

Marc R. Poirier
Attorney for the Public
Utilities Board of the City of
Brownsville, Texas

Enclosures
cc: All Parties

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