UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

In the Matter of

Houston Lighting & Power Company	)	
The City of San Antonio	)	
The City of Austin	)	Docket Nos. 50-498A
Central Power & Light Company	)	and 50-499A
(South Texas Project, Units	)	
No. 1 & No. 2)	)	

INITIAL INTERROGATORIES TO AND FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS BY
TEXAS UTILITIES COMPANY AND ITS SUBSIDIARIES
FROM THE PUBLIC UTILITIES BOARD OF THE
CITY OF BROWNSVILLE, TEXAS

Pursuant to Sections 2.740, 2.740(b) and 2.741 of the Nuclear Regulatory Commission's Rules of Practice under the Atomic Energy Act, the Public Utilities Board of the City of Brownsville, Texas ("Brownsville") hereby files initial interrogatories to and requests the production of documents by Texas Utilities Company and its subsidiaries ("TU").

I. GENERAL INSTRUCTIONS

1. Each interrogatory should be answered separately and fully in writing under oath or affirmation by the person (or persons) making it.

2. Each document produced in response to this request should be referenced with the number(s) of the relevant request and subsection, if any. Should any of the documents requested pursuant to this set of interrogatories and requests for document production have already been made available for Brownsville's inspection, it will be sufficient to note this fact and to provide the following information: (1) document production number, if any; (2)

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date, author, addressee (if any), persons receiving distribution of such document or copies thereof; (3) a description of the nature of the document; and (4) the particular request and item number in response to which the document has previously been produced.

3. Responses to interrogatories and requests for the production of documents shall be served upon the following persons:

Robert C. McDiarmid, Esquire
Robert A. Jablon, Esquire
Marc R. Poirier, Esquire
Spiegel & McDiarmid
2600 Virginia Avenue, N. W.
Washington, D. C. 20037

4. Documents should be provided by TU as they become available, but in any event no later than 30 days after the date of this request.

5. These interrogatories and requests for documents are of a continuing nature and require supplemental answers should TU generate or obtain further pertinent information or documents between the time its answers are filed and its documents produced and the time of the evidentiary hearing.

II. DEFINITIONS

A. "Documents" mean all writings and records of every type in the actual or constructive possession, control, or custody of TU, its directors, officers, employees, consultants, or agents, including but not limited to contracts, memoranda, correspondence, reports, surveys, tabulations,

charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, computer printouts, vouchers, accounting statements, telegrams and telegraphic communications, engineering diagrams (including "one-line diagrams"), mechanical and electrical recordings, records of telephone communications, speeches and all other records, written, electrical, mechanical, or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody, or control of TU, and every copy of a document which contains handwritten or other notations, or which in any other manner does not duplicate the original, or any other copy furnished pursuant to this request.

B. "Communications" shall include, without limiting the generality of its meaning, all conversations between two or more persons either in person or by telephone, all statements, speeches, declarations and comments, and shall include documents as defined in II.A. above.

C. "Person" shall mean any natural person, company, association, firm, corporation, cooperative, rural electric cooperative, municipality, joint stock association, or any political subdivision, agency or instrumentality of the federal, state, or municipal governments, or a lawful association of any of the foregoing, or any entity that produces, generates, transmits, distributes, purchases, sells, or furnishes electricity.

D. "Identify," when used with respect to documents, means that the type, author, recipient(s) of the original, recipient(s) of copies, date, and subject of the document should be specified.

"Identify," when used with respect to communications, means that the type of communication, maker of the communication, persons communicated to, persons for whom the communication was intended, date and subject of the communication should be specified.

"Identify," when used with reference to any corporation, association, cooperative, or other legal entity, means to state the name and current address of said organization or entity; if the current address is unknown, provide the last known address.

"Identify," when used with respect to any person, means that the person's name, current business address (or current mailing address for persons now retired), current job title, and employer, should be specified. If the current address is unknown, please provide the last known address.

Where more than one request in this series asks for identification of a document, communication, legal entity, or person, in response to the second and subsequent requests, please provide the name of a corporation, legal entity or person, or the date and author or maker of a document or communication, along with a reference to the response in which a full identification was provided.

E. "Representative" shall be understood to include, without limiting the generality of its meaning, any director, officer, employee, contractor, or consultant, of any person as defined in II.C., who at a particular formal or informal meeting, or in a particular document or communication, appears to participate in the meeting, or in the making of or the receipt of the document or communication, on behalf of or as agent for, said person. Whether or not a representative has actual authority as an agent of the person is irrelevant to his or her status as a representative.

F. "Relating to" or "relate" means consisting of, referring to, reflecting, or being in any way legally, logically or factually connected with. Requests "relating to" a subject or item should be understood to include possible or contemplated actions as to such subject or item. For example, a request for documents relating to interconnection plans would include documents relating to interconnection arrangements that have been considered but rejected.

G. "Electric utility" means a private corporation, cooperative, rural electric cooperative, municipality, joint stock association, or any political subdivision, agency or instrumentality of federal, state, or municipal governments, or a lawful association of any of the foregoing that owns, controls, or operates, or proposes or is studying the possibility of owning, controlling, or operating, facilities for the generation, transmission and/or distribution of electricity.

H. "Transmission services" shall mean the undertaking by a utility to transmit power and/or energy for any other electric utility, whether the power and/or energy is generated by the first utility or by any other electric utility. "Transmission services" shall also include the sale by a utility of transmission capacity without energy. "Transmission services" include wheeling.

I. "Interconnection" shall mean the physical junction of the electric transmission systems of two or more electric utilities so that electricity may flow over the junction according to location of points of power generation and power usage, in the same manner as electricity flows over the lines of an individual electric system. A junction normally maintained in an open position is considered an interconnection. A junction by which a lower voltage system is joined to a transmission line through a transformer is considered an interconnection.

"Interconnected operation" between two or more electric utilities shall mean a method of operation in which electricity flows over interconnections between the electric transmission and/or subtransmission systems of the electric utilities in the same manner as electricity flows along the lines of an individual electric system, whether or not such flow of electricity occurs pursuant to the terms of an interconnection agreement. "Interconnected operation" includes all forms of interchange, including sales, purchases or exchange of energy or capacity, reserves sharing, firm power, emergency, maintenance, seasonal, economy exchange, spinning

reserves and any similar transactions.

"Interconnection agreement" shall mean an agreement governing the rates, metering, and other terms and conditions under which interconnected operation occurs.

J. "Central Power & Light Company" or "CP&L" shall be understood to include its parent, direct or indirect subsidiary, affiliated or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by CP&L.

K. "Houston Lighting & Power Company" or "HL&P" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by HL&P.

L. "Texas Power & Light Company" or "TP&L" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by TP&L.

M. "Dallas Power & Light Company" or "DP&L" shall be understood to include its parent, direct or indirect subsidiary affiliated, or predecesor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by DP&L.

N. "Texas Electric Service Company" or "TESCO" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by TESCO.

O. "West Texas Utilities" or "WTU" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by WTU.

P. "Southwestern Electric Power Company" or "SWEPCO" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by SWEPCO.

Q. "Public Service Company of Oklahoma" or "PSO" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by Public Service Company of Oklahoma.

R. "Central & South West Corporation" or "CSW" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and a y entities providing electric service at wholesale or retail, the proper-

ties or assets of which have been acquired by CSW.

S. "Texas Utilities" or "TU" shall mean Texas Utilities Generating Company, its parent, affiliated, direct or indirect subsidiary and all predecessor companies, including, but not limited to, Texas Utilities Company, Dallas Power & Light Company, Texas Electric Service Company and Texas Power & Light Company, and all parent, subsidiary, or affiliated companies of each of these companies as defined above. Where a response to a particular request is not possible for the TU companies as a whole, although a response would be possible for some or all of the TU companies separately, please respond to that particular request for each TU company separately. Requests relating to agreements, communications, or other arrangements between TU and any other electric utility or between TU and any other person shall be understood to include a request for such agreements, communications, or arrangements between separate TU companies.

T. "South Texas Units" shall be understood to refer to the nuclear generating units for which applicants in the above-captioned proceeding have obtained a construction permit from the Nuclear Regulatory Commission.

III. DOCUMENTS NO LONGER IN TU'S POSSESSION, CUSTODY, OR CONTROL

If any document otherwise responsive to any request was, on or after December 19, 1970 (date of enactment of P.L. 91-560), but is no longer in TU's possession, or subject to TU's control, or in existence, state whether (1) it is

missing or lost, (2) has been destroyed, (3) has been transferred voluntarily to others, or (4) has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization. Identify each such document by listing its author and addressee, type (e.g., letter, memorandum, telegram, chart, photograph, etc.), date, subject matter, whether the document (or copies) are still in existence, and if so, their present location(s) and custodian(s).

IV. SCOPE OF PRODUCTION

Each paragraph below, unless otherwise specified, refers to all communications of which TU is aware, made or sent from January 1, 1965 to date, and to all documents made, sent, dated or received from January 1, 1965 to date, in TU's possession, custody, or control.

V. DOCUMENTS WITHHELD AS PRIVILEGED

If any documents within any description set out below are withheld by reason of any assertion of privilege, identify each such document by date, description, and type, identify all persons preparing and/or receiving each document, and state the privilege asserted, and the reasons that, in TU's opinion, justify the assertion of privilege as to each document.

VI. INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce all documents relating to any joint actions, actual or contemplated, by three or more operating companies that are members of the Texas Interconnected System ("TIS"), at least one of which is not a TU company; or by representatives of three or more operating companies that are members of the Texas Interconnected System, at least one of which is not a TU company. This request includes, but is not limited to, joint reports or studies, joint planning of generation or transmission expansion, and meetings of any kind. This request excludes agendas and minutes of annual or other regular meetings of TIS or its standing committees.

2. Please describe the manner in which agendas and minutes are prepared for TIS meetings and meetings of TIS committees and subcommittees. For TIS and for each TIS committee and subcommittee, please answer the following:

(a) Who is generally responsible for preparation and determination of subjects to be considered?

(b) Do prepared agendas and minutes actually reflect the substance of all discussion had during such meetings? If not, describe how actual discussion may deviate from the prepared agendas.

The scope of this interrogatory extends to all periods in which meetings of TIS or TIS committees or subcommittees have been held.

3.(a) What is the purpose of the Electric Reliability Council of Texas ("ERCOT")? Describe fully the functions of ERCOT, both formal and informal, with respect to the following

areas:

(i) planning for construction of new generation facilities by any member electric utilities;

(ii) planning for construction of new transmission facilities by any member electric utilities;

(iii) spinning reserves of any member electric utility;

(iv) central dispatch among any and/or all member electric utilities;

(v) fuel acquisition by any or all member electric utilities;

(vi) interconnected operation by any or all member electric utilities.

(b) Describe fully the way in which TU is affected by, or takes into account, the activities and/or decisions of ERCOT with respect to each of areas (i) through (vi) listed in (a) above.

(c) Produce all documents relating to (a) or (b) above.

4.(a) What is the purpose of TIS? Describe fully the functions of TIS, both formal and informal, with respect to the following areas:

(i) planning for construction of new generation facilities by any member electric utilities;

(ii) planning for construction of new transmission facilities by any member electric utilities;

(iii) spinning reserves of any member electric utility;

(iv) central dispatch among any or all member electric utilities;

(v) fuel acquisition by any or all member electric utilities;

(vi) interconnected operation by any or all member

electric utilities.

(b) Describe fully the way in which TU is affected by, or takes into account, the activities and/or decisions of TIS with respect to each of areas (i) through (vi) listed in (a) above.

(c) Describe any post-1967 plan or proposal made, drawn up, or discussed, in whole or in part, by officers, representatives or employees of TU, for the purpose of revising the TIS Agreement. Identify any person(s) who made any decision to proceed to consider or formulate a revision, and any person(s) who drafted any draft of a proposed revision; indicate all reasons for and against such a revision considered by TU; identify all persons not associated with TU with whom any proposed TIS revision was discussed or to whom a draft revision was shown, including the date and substance of each communication relating to any proposed revision; indicate whether proposed revisions were finally implemented, including all reasons why proposed revisions were or were not to be implemented.

(d) Produce all documents relating to (a), (b) and/or (c) above.

5.(a) What is the purpose of the North Texas Interconnected System ("NTIS")? Describe fully the functions, both formal and informal, of NTIS with respect to the following areas:

(i) planning for construction of new generation facilities by any member electric utilities;

(ii) planning for construction of new transmission facilities by any member electric utilities;

(iii) spinning reserves of any member electric utilities;

(iv) central dispatch among any or all member electric utilities;

(v) fuel acquisition by any or all member electric utilities;

(vi) interconnected operation by any or all member electric utilities.

(b) Describe fully the way in which TU is affected by, or takes into account, the activities and/or decisions of NTIS with respect to each of areas (i) through (vi) listed in (a) above.

(c) Produce all documents relating to (a) or (b) above.

6. Please produce any documents relating to any comparison of ERCOT and TIS and/or NTIS. Please identify any communications of which TU is aware relating to any such comparison. Please produce all documents relating to each such communication. Where communications described in this request are documents, the document may be produced in lieu of identifying the communciations.

7. Please produce all indexes or other descriptions, either partial or complete, computerized and/or manually created, to discovery documents produced in response to interrogatories and document requests propounded in West Texas Utilities Co. v. Texas Electric Service Co., Case No. CA3-76-0633F (N. D. Texas, Dallas Div.) or in other related proceedings as noted in the Licensing Board's Special

Prehearing Conference Order in the above-captioned proceeding dated July 13, 1978.

8. Please produce all documents relating to TU's gas supply, including entitlements, ownership interests or any other form of control of or access to gas, and including projections or potential supply for or covering the period 1972 to date. Exclude routine billing documents.

9. To the extent not otherwise produced or supplied in response to this interrogatory and data request, or to previous related interrogatories and data requests, please produce all documents since January 1, 1970 relating to any agreements or understandings, formal or informal, whether contemplated or actually made, and to all discussions or any other form of communication concerning such agreements or understandings, between TU and any other electric utility relating to:

(a) sales, purchases, transfers, deliveries, exchanges, coordination, or scheduling of natural gas use during periods of gas curtailment;

(b) sales, purchases, transfers, deliveries, exchanges, coordination or scheduling of capacity or energy to offset increased costs associated with gas curtailments.

10. Please respond to the following subparts separately with respect to:

(i) gas

(ii) lignite

(iii) coal

(iv) uranium

With respect to any particular proprietary interest or transaction, if documents sufficient to describe the interest or transaction are provided, no further response is required with respect to that particular interest or transaction.

(a) Describe separately by company the amount, cost, and location of fuels listed in (i)-(iv) in which TU and each parent, affiliated, or subsidiary company of TU had an ownership or other proprietary interest as of January 1, 1970. Include the date, original cost, and means of acquisition of each such interest in fuel.

(b) Describe separately by company each acquisition, transfer, or supply contract for any fuel listed in (i)-(iv) above from January 1, 1970 to date. Include acquisitions, transfers, and supply contracts among TU companies, including any parent, affiliated or subsidiary company, as well as any acquisitions, transfers, or supply contracts between any such company and any other person. Describe the terms of each such acquisition, transfer, or supply contract, including the parties, dates, amount and location of fuel involved, all consideration given in exchange for fuel, and the value of such consideration.

11. In responding to this request (Number 11) please provide information separately for TP&L, DP&L, TESCO, and any other TU company to which a particular subpart is applicable.

(a) Please produce all fuel contracts in effect at any time from January 1, 1972 to the present. Please include expiration dates and renegotiation dates for all such contracts.

(b) Please provide the unit cost of power or energy purchased from any other electric utilities, by utility and by month, from January 1, 1972 to date. Please list cost for demand and energy separately. Please list separately or itemize each type of power produced, e.g., firm power, economy power, scheduled maintenance power, etc.

(c) Please provide the average fuel cost in mills/kwh for self-generated energy by month from January 1972.

(d) Please provide the average unit price of energy sold by month from January 1972 to date. Exclude any demand or fixed costs.

(e) Please produce load duration curves by day and week for the winter and summer peak period for each year from 1972 to date. Please include both actual load duration curves and those depicting projected load duration through 1990, if available, prepared from 1972 to date.

(f) Please produce projected mill rate dispatch tables from 1972 through 1990.

(g) Please produce copies of the Uniform Statistical Report to the Edison Electric Institute from 1972 to the present.

(h) Please produce copies of the FERC Form 423 or similar reports from its inception to date. For periods from January 1972 to date for which a Form 423 is unavailable, please produce copies of any report or reports made to the Texas Public Utilities Commission or its predecessors that contain equivalent information.

(i) Please produce copies of the FERC Form 1 or similar reports from 1972 to the present. For any year within this period for which no Form 1 is available, please produce copies of any report or reports made to the Texas Public Utilities Commission or its predecessors that contain equivalent information; and in any event provide, from whatever source, information equivalent to that contained on the following FERC Form 1 schedules:

422-423	purchased power
424	interchange power
425	transmission by or for others
431	electric energy account; monthly peaks and output
432-441	generating plants
442-444	transmission line statistics; transmission added during the year
445	substations

(j) Please produce copies of the FERC Form 12 or similar reports from 1972 to the present. For any year within this period for which no Form 12 is available, please produce copies of any report or reports made to the Texas Public

Utilities Commission or its predecessors that contain equivalent information; and in any event provide, from whatever source, information equivalent to that included on the following schedules of FERC Form 12:

1 capacity and output of system generating plants

2 system hydroelectric data

3 plant data - small plants

4 hydroelectric plant data

4-A pumped storage plant data

5 steam-electric, including nuclear, plant data

7 internal-combustion engine and gas-turbine plant data

8 itemized accounting of energy transfers

9 system energy accounting for the year

18 system maps and diagrams

(k) Please provide load flow diagrams for the main transmission system from 1972 to date, including summer peak, winter peak, and a typical off-peak period.

12. Please produce all documents relating to any arrangements of TU relating to power generated at any hydroelectric generating facility, including but not limited to arrangements for acquisition, use, coordinating, scheduling, and direct purchase.

13.(a) Describe all offers of participation in the South Texas Units 1 and 2, including all electric utilities to which offers were made, the representative(s) by whom each offer was made, the representative(s) of each utility to which offers were made, the date of each such offer, and the terms of each such offer.

(b) Produce all documents relating to participation, actual or potential, by any electric utility in the South Texas Units, including the terms and conditions, limitations or restrictions of such participation.

(c) Identify all communications among officers, representatives or employees of TU and all communications between officers or representatives of TU and any other person, relating to participation in the South Texas Units by any other electric utility. Provide all documents relating to each such communication. If documents provided in response to (b) above fully identify a particular communication, no further response is required as to that particular communication.

14. In responding to question 14, it is not necessary to produce documents relating to the negotiation over terms of particular participation agreements relating to Comanche Peak Units 1 and 2.

(a) Describe all offers of participation in the Comanche Peak Units 1 and 2, including all electric utilities to which offers were made, the representative(s) by whom each offer was made, the representative(s) of each utility to which offers were made, the date of each such offer, and the terms of each such offer.

(b) Produce all documents relating to participation, actual or potential, by any electric utility in the Comanche Peak Units, including the terms and conditions, limitations or restrictions of such participation.

(c) Identify all communications among officers, representatives or employees of TU and all communications between officers or representatives of TU and any other person, relating to participation in the Comanche Peak Units by any other electric utility. Provide all documents relating to each such communication. If documents provided in response to (b) above fully identify a particular communication, no further response is required as to that particular communication.

15.(a) Please produce all documents relating to transmission services, actual or potential, by TU to any other electric utility. Please note that "transmission services" as defined in II.H. above includes transmission of power generated by TU to any other electric utility. Exclude routine billing and log data.

(b) Please produce all documents relating to construction of additional transmission facilities, or to increasing the capacity of existing transmission facilities, actual or potential, by TU, for the purpose, in whole or in part, of providing transmission services to any electric utility other than a TU company.

16. To the extent not otherwise provided or supplied in response to this interrogatory and data request, or to previous related interrogatories and data requests, please produce all documents relating to interconnection and/or interconnected operation of TU with any other electric utility.

17. To the extent not otherwise provided or supplied in response to this interrogatory and document request, or to previous related interrogatories and document requests, please produce copies of any interconnection

agreements entered into between TU and any other electric utility.

18.(a) To the extent not otherwise provided or supplied in response to this interrogatory and document request, or to previous related interrogatories and document requests, please produce all documents relating to the sale of power, actual, planned or potential, or to establishing terms for the sale of power, from TU to any of the following:

(i) the electric utility system operated by the Public Utilities Board of Brownsville;

(ii) any other municipally owned and/or operated electric utility;

(iii) any cooperative or rural electric cooperative

Exclude billing and log data.

(b) Please produce all documents relating to participation, actual, planned or potential, or to establishing terms for any participation, by any electric utility listed in (a) (i)-(iii) above in any generation facility of which TU is whole or part owner.

(c) Please produce all documents relating to joint participation by TU and any utility listed in (a) (i)-(iii) above in any research, study or project relating to the use of geothermal, biomass, lignite or solar energy as an actual or potential source of electric power.

18.(a) Please produce all documents relating to any attempts, whether actual or contemplated, by TU to acquire or to lease, either in whole or in part, the electric facili-

ties of any municipally or cooperatively owned electric utility located in or adjacent to TU's service territory. The scope of this request is from January 1, 1957 to the present.

(b) Identify any communications relating to any acquisition or lease attempt referred to in (a) or (b) above between officers or representatives of TU and any other person, including, but not limited to, members of, or employees of, governing boards, city commissions or utilities authorities responsible in any way for the overall operation of such municipally or cooperatively owned electric utilities. Please provide all documents relating to each such communication. If documents produced fully identify and describe the substance of a particular communication, no further response is required with respect to that particular communication.

19. Please produce all documents relating to the power supply, transmission requirements, and/or competitive position of any municipally or cooperatively owned and/or operated electric utility, including, but not limited to studies and analyses.

20.(a) Please list all industrial customers and commercial customers of TU whose peak load has ever exceeded 2,000 kw, for which service by TU in a particular location commenced after January 1, 1970. Please indicate the first month of service for each such customer and, where known, whether that customer was previously located in another location, and, if so, indicate that previous location.

(b) Please produce all documents from January 1, 1970 to the present relating to inquiries by potential new industrial customers concerning rates or services of TU or any other benefits of location in areas served by TU whether or not such benefits relate to services or electric power provided. Whether or not any particular industrial customer actually chose or may choose to locate in territory served by TU is irrelevant to the scope of this request. Please note that this document request (like all document requests hereby submitted to TU by Brownsville) includes documents generated by or located at local and district offices as well as central company offices.

(c) Please produce copies of all documents relating to communications from any actual industrial or commercial customer of TU whose peak load has ever exceeded 2,000 kw, concerning TU rates or services, or concerning any expansion of the customer's plant that would result in an increase in power consumed. Exclude routine billing documents, but include documents relating to any inquiry or questioning of rates or of specific bills. The scope of this request is from January 1, 1970 to the present.

21. Please list all industrial or commercial customers of TU whose peak load has ever exceeded 2,000 kw, that have terminated purchases of power or services from TU since January 1, 1970. With respect to each such customer, indicate the month of termination, and, if known, whether the

customer moved to another location, and, if so, indicate that location. Please provide all documents relating to each termination of services by each customer described in this request.

22. Please provide rates of TP&L, DP&L, and TESCO for all classes of customers since January 1, 1970.

23.(a) Since January 1, 1957, has TU ever offered or considered offering any special rate or individually designed rate to any customer, including, but not limited to, industrial or commercial customers whose peak load has ever exceeded 2,000 kw?

(b) Has TU ever considered offering any special rate or individually designed rate to any potential new industrial customer since January 1, 1957?

(c) If your answer to (a) and/or (b) is in the affirmative, please provide all documents relating to each such offer or rate, or potential offer or rate. Exclude routine billing documents from this request.

(d) If your answer to (a) and/or (b) is in the affirmative, please provide all documents relating to every communication with any such industrial or commercial customer or potential new industrial customer that occurred in the year in which the offer was made or considered, and the two years preceeding and the two years following the year in which the offer was made or considered. Exclude routine billing documents. Documents produced in response to No. 20(b) or (c) of this request need not be referenced in response to No. 23(d).

24. Please state all reasons TU has considered for and against operating in interstate commerce. Please provide principal documents relating to each such reason.

25. (a) Please produce all documents relating to the contract negotiations between WTU and Gate City Electric Cooperative referred to in Response No. 7 of the Answer of Texas Utilities Company and its Subsidiaries to the First Set of Interrogatories and Requests for Production of Documents from the Department of Justice, dated January 12, 1979 ("TU Answer to Justice").

(b) Please describe all reasons considered by TU for and against the 1976 communication from Mr. Marquardt, president of TESCO, to Mr. Chalker, president of WTU, referred to in Response No. 7 of the TU Answer to Justice. Please produce all documents relating to each such reason.

(c) Describe fully the substance of the communication between Mr. Marquardt and Mr. Chalker described in (b) above.

(d) On what day, at what time, and by what means did the communication between Mr. Marquardt and Mr. Chalker referred to in (b) above occur? What events or considerations caused Mr. Marquardt to make the communication at that time and in that manner?

(e) Please identify all communications relating to the communication between Mr. Marquardt and Mr. Chalker described in (b) above, including but not limited to all communications between Mr. Marquardt and any other person. Please provide

all documents relating to each such communication. If documents provided in response to any part of this request fully identify and describe the substance of a particular communication, no further response is necessary with response to that particular communication.

26.(a) To the extent not otherwise produced or supplied in response to this interrogatory and data request, or to previous related interrogatories and data request, please produce all documents relating to actual or potential transmission services, in whole or in part on lines owned by TU, between any member(s) of the Texas Municipal Power Pool (the Cities of Bryan, Denton, Garland, and Greenville, Texas, and the Brazos Electric Generating Cooperative) and any other electric utility.

(b) Please identify all communications between any officer or representative of TU and any other person relating to actual or potential transmission services, in whole or in part across lines owned by TU, between the City of Denton, Texas and the City of Austin, the City Public Service Board of the City of San Antonio, Texas, and/or the Lower Colorado River Authority. Please provide all documents relating to each such communication. If documents produced in response to this request fully identify and describe the substance of a particular communication, no further response is required with respect to that particular communication. The scope of this subpart is from January 1, 1970 to date.

27.(a) To the extent not produced or previously supplied in response to this interrogatory and data request, or to previous related interrogatories and data requests, please produce all documents relating to actual, potential, possible or contemplated competition between TU and any other electric utility that is not a TU company.

(b) To the extent not produced or previously supplied in response to this interrogatory and data request, or to previous related interrogatories and data requests, please produce all documents in the actual or constructive possession of any TU company relating to power supply, cost of generation, cost to customers, or reliability of service of any electric utility other than the TU companies.

(c) Please identify all communications between any officer or representative of TU and any other person, including members of, or employees of, any governing boards, city commissions, or utility commissions responsible for the overall operation of any municipally or cooperatively owned and/or operated electric utility, relating to any subject described in (a) or (b) above. Please produce all documents related to each such communication. If documents produced in response to this interrogatory and data request, or to previous, related interrogatories and data requests, fully identify and describe the substance of a particular communication, no further information is necessary with respect to that particular communication.

28. Please furnish a copy of all of TU's responses to interrogatories and document requests submitted to TU in the instant proceeding by any other party including all schedules, exhibits, attachments, appendices, and collections and compilations of documents.

29. Please update responses to all interrogatories and data requests received by TU in this proceeding or in any related proceeding (listed at pages 6-7 of the Special Prehearing Conference Order of July 13, 1978 in the above-captioned proceeding), the discovery of which has been ordered to be treated as part of the discovery in this proceeding.

30. Please identify the persons who prepared or assisted in the preparation of TU's response to each of the foregoing requests.

Respectfully submitted,

Marc Poirier

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UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
Houston Lighting & Power Company	)	Docket Nos. 50-498A
The City of San Antonio	)	and 50-499A
The City of Austin	)	
Central Power & Light Company	)	
(South Texas Project, Unit Nos. 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing INITIAL INTERROGATORIES TO AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS BY THE TEXAS UTILITIES COMPANY AND ITS SUBSIDIARIES FROM THE PUBLIC UTILITIES BOARD OF THE CITY OF BROWNSVILLE, TEXAS in the above-captioned proceeding to be served on the following by deposit in the United States mail, first class, postage prepaid, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission internal mail system, this 31st day of January, 1979.

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