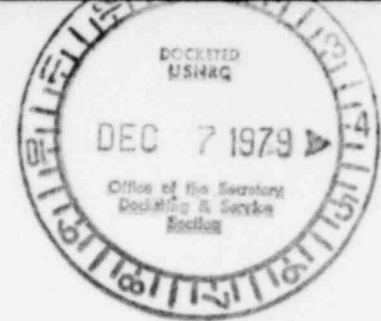


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Atomic Safety & Licensing Board



In the Matter of
HOUSTON LIGHTING & POWER CO.
(Allens Creek Unit 1)

Docket 50-466
Dec. 5, 1979

TEXPIRG'S SIXTH SET OF INTERROGATORIES TO HL&P

TexPIRG, an intervenor in the above-styled proceeding, requests that Applicant Houston Lighting & Power Company (HL&P) respond fully to the following interrogatories:

1. On Nov. 7, 1979, the Board ruled that TexPIRG could request information regarding HL&P's power plant construction in order to determine how much "power" conservation is required to meet in order to obviate ACNGS. The following sub-parts of this interrogatory are requested in that regard.

(a) In earlier responses, HL&P stated that the Dow power plant proposal was the predecessor of the Limestone Lignite Plant. What was the MWe rating for the proposed Dow venture? Was power from the proposed Dow venture included in the installed capacity projections on either Table S.1.1-3 of ER Supp., App. SH, p. SH-100 of the Environmental Report, or Tables S.8.13 and S.8.14 of the FS-Final Environmental Statement?

(b) Has HL&P revised demand projections for the time frame in which ACNGS is expected to come on-line since the publication of the FS-Final Environmental Statement? If so, what is the new peak demand projection for the relevant years? Is that an upward or downward revision?

(c) Is the Limestone Lignite Plant a response, in any way, to revised peak demand projections? To what extent have any revised demand projections affected the Limestone facility?

(d) Would HL&P build both ACNGS and the Limestone facility within the presently similar time frames if the company decided to maintain its present reserve margin level each year rather than increase the reserve margin? Is the Limestone Power Plant decision a result of the ACNGS determination

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by HL&P management that the reserve margin should be increased above 20 % in the next decade?

2. With regard to HL&P's peak load forecast for the next ten years, provide the following for the linear analysis involved with each rate class:
- (a) R^2 for each independent variable.
 - (b) t-statistic (or other measure of significance level).
 - (c) Percent unexplained variance.
 - (d) Durbin-Watson statistic.

Please give the number of degrees of freedom where applicable for each statistic.

3. With regard to HL&P's load forecast, what differences in price elasticity are assumed for each rate class (residential, commercial, and industrial)?

Respectfully,

Clarence Johnson
Executive Director
TexPIRG, Box 237 UC, Univ. of Houston
Houston, TX 77004

I, Clarence Johnson, certify that this document has been served upon all parties listed in the certificate of service of TexPIRG's Motion to Compel Discovery (accompanying) on Dec. 5, 1979. Service was by deposit in the U.S. mail.

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