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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
HOUSTON LIGHTING & POWER)	NRC Docket Nos. 50-498A
COMPANY, <u>et al.</u>)	50-499A
)	
(South Texas Project, Unit)	
Nos. 1 and 2))	
)	
In the Matter of)	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445A
COMPANY, <u>et al.</u>)	50-446A
)	
(Comanche Peak Steam)	
Electric Station, Units 1)	
and 2))	(Consolidated for Discovery)

CENTRAL POWER AND LIGHT COMPANY'S
FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
ADDRESSED TO TEXAS UTILITIES GENERATING COMPANY, et al.

Central Power and Light Company ("CPL"), through its attorneys and pursuant to Rules 2.740b and 2.741 of this Commission's Rules of Practice, propounds the following Interrogatories and Requests for Production of Documents to Texas Utilities Generating Company ("TUGCO") and Dallas Power and Light Company ("DPL"), Texas Power and Light Company ("TPL"), and Texas Electric Service Company ("TESCO") (collectively "the TU Companies"). CPL requests that the Interrogatories be answered according to the Rules within 14 days of service and that the documents requested herein be produced for inspection and copying 30 days after service.

Pursuant to the directive of the Board (Transcript at 105), issued at the prehearing conference on June 21,

1978, these interrogatories and requests for production of documents are continuing in nature and, accordingly, require supplemental answers or production should further pertinent information or documents be generated or obtained after the time for compliance with these discovery requests.

Definitions:

"Documents" means, without limiting the generality of its meaning, all original (or copies where originals are unavailable) and non-identical copies (whether different from originals by reason of notation made on such copies or otherwise) of all written, recorded or graphic matter, however produced or reproduced, whether or not now in existence, including but not limited to correspondence, telegrams, notes or sound recordings of any type of conversation, meeting, or conference, minutes of directors' or committee meetings, memoranda, inter-office communications, studies, analyses, notes, books, records, reports, summaries and results of investigations and tests, reviews, contracts, agreements, pamphlets, diaries, calendar or diary entries, maps, graphs, charts, statistical records, computer data or papers similar to any of the foregoing, however denominated, including preliminary versions, drafts or revisions of any of the foregoing and any supporting, underlying or preparatory material.

"Identify" when used in reference to a natural person means to state the person's full name, business affiliation and last known address.

"Relating to" means consist of, refer to, reflect or be in any way legally, logically or factually connected with the matter discussed.

Interrogatories and Requests for Documents:

1. Identify every change to the existing or planned transmission or distribution systems of any of the TU Companies which would be necessary to permit each of them to provide approximately the same level of reliability of service as they currently provide in the event the Central and South West ("CSW") operating subsidiaries engage in Mode 4 operation.

2. (a) State the approximate cost of the changes identified in your Answer to Interrogatory Number 1,

(b) state the method by which the cost was computed, and

(c) identify the individual(s) who computed the cost.

3. State separately the present attitude of the management of TESCO, TPL and DPL on the issue of interstate versus intrastate operation and identify every factor which was considered by each management in forming that attitude.

4. Have any of the TU Companies contracted with any other electric utility to purchase or sell electricity in any year between 1979 and 2000?

5. If the Answer to Interrogatory Number 4 is in the affirmative,

(a) identify each electric utility with which DPL, TPL or TESCO has so contracted,

(b) describe the terms of each such contract by stating whether the TU Company will purchase or sell, or both; the quantities of electricity to be purchased or sold, the period during which such purchases and sales will occur and the price to be paid or received for such electricity, and

(c) produce a copy of each such contract.

6. Are any of the TU Companies currently negotiating, or considering, the possible purchase from or sale to other electric utilities of electricity in any year between 1979 and 2000?

7. If the Answer to Interrogatory Number 6 is in the affirmative,

(a) identify each electric utility (i) with which DPL, TPL or TESCO is currently negotiating for such purchase or sale or (ii) which DPL, TPL or TESCO is considering for such purchase or sale, and

(b) state the terms of each such purchase or sale which is being negotiated or considered.

8. Have any of the TU Companies entered into any agreement or understanding with any other electric utility for the provision of "wheeling" or other transmission services?

9. (a) If the answer to Interrogatory Number 8 is in the affirmative, with respect to each such agreement or understanding

(i) identify the other electric utility with which DPL, TPL or TESCO has the agreement or understanding, and

(ii) describe the terms of each such agreement or understanding by stating the utility which will provide the "wheeling" or other transmission service, the amount of electricity to be "wheeled", the period of time during which such "wheeling" or other transmission service will be provided, and the charge for such "wheeling" or other transmission service.

(b) Produce all documents which reflect any agreement or understanding between DPL, TPL or TESCO and any other electric utility for the provision of "wheeling" or other transmission services.

10. (a) State separately the policy or position of each of the TU Companies with respect to the provision by them of "wheeling" or other transmission services for other electric utilities and

(b) produce all documents relating to such policy or position.

11. Identify every benefit which TUGCO or any of the TU Companies believe any of them might obtain in the event the TU Companies engage in Mode 4 operation with the CSW operating subsidiaries.

12. Describe every adverse consequence which TUGCO or any of the TU Companies believe might result from

(a) disconnection of (i) DPL (ii) TPL and (iii) TESCO from the other TU Companies;

(b) disconnection of the TU Companies from the CSW subsidiaries;

(c) disconnection of the TU Companies from Houston Lighting & Power Company ("HLP");

(d) disconnection of the TU Companies from the CSW subsidiaries and HLP; and

(e) disconnection of (i) DPL (ii) TPL and (iii) TESCO from all other electric utilities.

13. (a) Describe the manner in which TUGCO or any of the TU Companies believes each adverse consequence described in the Answer to Interrogatory number 12 could be mitigated or eliminated; and

(b) state the approximate cost which such mitigation or elimination would entail.

14. Produce all documents relating to each inquiry received by the TU Companies or any of them since March 1, 1977 from any person, firm or corporation which at the time of the inquiry was not a customer of the Company receiving the inquiry, concerning the cost or price at which any of the TU Companies would sell electricity.

15. Produce all documents relating to each inquiry received by the TU Companies or any of them since March 1, 1977 from any person, firm or corporation which at the time of the inquiry was a customer of any of them, concerning the cost or price at which any of the TU Companies would be able to sell electricity in the future.

16. Identify all industrial or commercial customers whose peak load has ever exceeded 2,000 kw and who have terminated receiving electricity from any of the TU Companies since January 1, 1970. With respect to each such customer

state the month of termination, whether the customer moved to another location (and, if so, where) and the reason for such termination.

17. Produce all documents prepared since January 1, 1974 analyzing or relating to

(a) the cost or price at which any of the TU Companies will be able to sell electricity in the future and/or

(b) the impact of the cost or price of electricity on any of the TU Companies' ability to retain existing customers or attract new customers.

18. Produce all documents prepared since August 1, 1976 relating to the effect, if any, on the DPL, TPL or TESCO transmission or distribution system or on DPL's, TPL's or TESCO's ability to provide service to its customers, of any of the proposals advanced by CSW for the more complete coordination of its subsidiary companies in either Mode 2 or Mode 4.

19. Produce a copy of each advertisement placed since March 1, 1977 which attempted to encourage potential industrial or commercial customers to locate a plant or facility in the service area of DPL, TPL or TESCO, and identify the newspaper, journal, magazine or periodical in which, and state the time period during which, each such advertisement was run.

20. State the amount which DPL, TPL and TESCO have spent on advertising in each year since 1970.

21. State (a) the amount of the fuel cost adjustment to the industrial customers of TPL, DPL and TESCO for each month since January, 1978 and (b) whether the fuel cost adjustment to industrial customers for each such month differed from the fuel cost adjustment applied to other customer classes.

22. Describe (a) the efforts which each of the TU Companies have made since January 1, 1974 to attract or induce potential or existing industrial customers to locate or expand plant or other facilities in the service area of DPL, TPL or TESCO and (b) which of those efforts are still being made at present.

23. (a) Describe specifically every respect in which TUGCO or any of the TU Companies believe that coordination within the Electric Reliability Council of Texas ("ERCOT") could be maximized in the period 1979 through 2000 and state the benefits which the ERCOT companies could achieve through such maximum coordination and

(b) Produce all documents relating to any analysis of maximizing coordination within ERCOT and/or the benefits achievable through such coordination.

24. State the name, business address, residence address and position in or affiliation with TUGCO, DPL, TPL or TESCO of each person who provided information in connection with the answers to any or all of these Interrogatories, and indicate by number those Interrogatories with respect to which each such person provided information.

25. (a) Identify each person whom TUGCO, DPL, TPL or TESCO expects to call as an expert witness at the hearing in this case by stating each such person's name, occupation and business address.

(b) State the subject matter on which each person identified in your answer to Interrogatory Number 25(a) is expected to testify.

(c) State (i) the substance of the facts and opinions to which each person identified in your answer to Interrogatory Number 25(a) is expected to testify and (ii) a summary of the grounds for each such opinion.

26. Identify each person whom TUGCO, DPL, TPL or TESCO has employed in anticipation of or in connection with the preparation for the hearing in this case and who is not expected to be called as an expert witness.

27. Identify every non-expert witness whom TUGCO, DPL, TPL or TESCO expects to call as a witness at the hearing in this case.

Respectfully submitted,

ISHAM, LINCOLN & BEALE

By _____
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