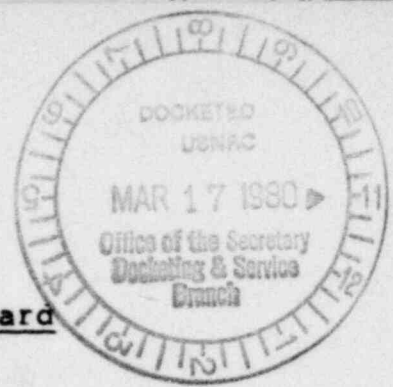


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



Before the Atomic Safety and Licensing Board

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

THIRD SUPPLEMENTAL RESPONSE OF DEPARTMENT OF JUSTICE TO
HOUSTON LIGHTING & POWER COMPANY FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

The Department of Justice ("Department") hereby submits its Third Supplemental Response to Interrogatories 1/ propounded by Houston Lighting & Power Company ("HL&P") 2/ pursuant to agreement of counsel on February 20, 1980. 3/ The answers and information provided herein are complete to the Department's information and belief as of March 12, 1980. However, as substantial discovery is still being conducted in these proceedings, it may be necessary for the Department, pursuant to

1/ The Department previously supplied information responsive to this request in its Response to Applicant's First Request for Production of Documents and Answer to Interrogatories on October 10, 1978, December 4, 1978 and February 1, 1980.

2/ First Set of Interrogatories and Requests for Production of Documents from Houston Lighting & Power Company to Antitrust Division, U.S. Dept. of Justice, August 1, 1978.

3/ February 25, 1980 letter from J. A. Bouknight, Jr. to Marshall E. Miller.

8004080033

Section 2.740(e) of the Nuclear Regulatory Commission's Rules of Practice to supplement or amend these Responses prior to trial to include any additional information which becomes available.

Department's Supplemental Response to HL&P Interrogatory
3(b) and 25(a)

Since February 1, 1980, the Department has ascertained the following additional information in order to more fully respond to the above-mentioned HL&P Interrogatories. The basis for the Department's contention that there are four relevant product markets in these proceedings i.e., the retail service market; the wholesale power market; the coordination services market; and the transmission services market, is the expert opinion of Dr. Gordon T. C. Taylor ("Dr. Taylor"), the Department's designated expert economic witness.

The general bases for Dr. Taylor's proposed testimony in these proceedings was already provided to HL&P in the Department's Second Supplemental Response to HL&P's Second Set of Interrogatories, filed on October 19, 1979. In addition, the specific bases for Dr. Taylor's proposed testimony in these proceedings will also be founded on the conclusions from his own factual investigation and review of the discovery in these proceedings. Dr. Taylor revealed the status of his investigation and review as of October 25-26, 1979, at his previous deposition. Since that time, Dr. Taylor has also continued his investigation and review of the discovery in these proceedings. The Department

believes that Dr. Taylor presently will base his proposed testimony, regarding the aforementioned product markets, on the following information and data. However, the Department believes that Dr. Taylor will continue to add to this list as his investigation and review of discovery continues:

A. Industrial competition in a retail service market:

1. Interviews in April 1979 of Texas Public Utilities Commissioners by Dr. Taylor;
2. Interview on January 18, 1980 of William Rolwedge and Sid Walker, Esquire, Dow Chemical Corporation at Freeport, Texas, by Dr. Taylor;
3. Interview on January 11, 1980 of George Knowles, Director of Energy Affairs, Diamond Shamrock Corporation by Dr. Taylor;
4. Interview in April 1979 of Charles Herring, General Manager, Lower Colorado River Authority ("LCRA") by Dr. Taylor;
5. Interview on January 15, 1980 of Stephanie Coleman, Industrial Development Consultant, Texas Industrial Commission by Dr. Taylor;
6. Published materials by the Texas Industrial Commission provided to Dr. Taylor at January 15, 1980, interview [a list of these documents is attached hereto as Exhibit A];
7. Interrogatory Answers of the City of Brownsville, Texas in these proceedings;
8. Data in U.S. Census of Manufacturers (1976);
9. Deposition testimony in these proceedings of Dr. John W. Wilson, economist for the City of Brownsville; Alfred E. Naylor, Manager of Planning at Gulf States Utilities Co.; James Eiland, Manager of Cap Rock Electric Cooperative.

B. Yardstick competition in a retail service market:

1. Dr. Taylor's knowledge of the different types of ownership of electric utilities;
2. Retail service area certification by Texas Public Utilities Commission ("TPUC");
3. Interrogatory Answers of the City of Brownsville, Texas in these proceedings;
4. Interview in April 1979 with Charles Cowden, Chairman, TPUC by Dr. Taylor;
5. Interview in April 1979 of TPUC Commissioners by Dr. Taylor;
6. Interview on January 15, 1980 of Stephanie Coleman, Texas Industrial Commission by Dr. Taylor;
7. Interview in April 1979 of Neil Johnson, Texas Electric Cooperative Association and review of documents in Mr. Johnson's office by Dr. Taylor;
8. Interview in April 1979 with South Texas Electric Cooperative by Dr. Taylor;
9. Deposition testimony in these proceedings of: Juan Nichols, Manager of Wood County Electric Cooperative; Walter M. Bowers, Division Chief of Power Marketing at Southwestern Power Administration; Donald D. Sykora, Vice President of Customer Relations at HL&P.

C. Franchise competition in a retail service market:

1. Interview in April 1979 with John Bell, Esquire, General Counsel of TPUC by Dr. Taylor;
2. Interview in April 1979 with L. E. Gross, General Manager, Medina Electric Cooperative and W. S. Robson, General Manager at South Texas Electric Cooperative;

3. Interview in April 1979 of Neil Johnson, Texas Electric Cooperative Association and review of documents in Mr. Johnson's office by Dr. Taylor;
4. Switchover Hearings filing at TPUC reviewed by Dr. Taylor at TPUC in April 1979;
5. Interrogatory Answers of City of Brownsville, Texas in these proceedings;
6. Interview in April 1979 and January 14-15, 1980 of John Bell, Esquire, General Counsel of TPUC by Dr. Taylor;
7. Deposition testimony in these proceedings of: Louis W. Howard, Vice President at Texas Power & Light Co.; James D. Eiland, Manager at Cap Rock Electric Cooperative; Juan A. Nichols, Manager at Wood County Electric Cooperative;
8. Franchises sent to Dr. Taylor on March 10, 1980 and March 12, 1980. (A list of original franchises is being provided to HL&P on this date pursuant to its July 17, 1979 subpoena duces tecum. The franchises are available for inspection at the offices of the Antitrust Division, in Washington, D. C. on reasonable notice.)

D. Wholesale power market:

1. 1978 Federal Energy Regulatory Commission Form 1 for Houston Lighting and Power Company and Texas Power & Light Company;
2. Interviews in April 1979 of W. S. Robson, General Manager at South Texas Electric Cooperative and L. E. Gross, General Manager at Medina Electric Cooperative.
3. Interview on February 5, 1980 of Robert Gross, Southern Engineering by Dr. Taylor; ..

4. 1977 and 1978 Annual Reports of Rural Electrification Administration;
5. Deposition testimony in these proceedings of: Louis W. Howard, Vice President at Texas Power & Light Co.; Walter Bowers, Division Chief of Power Marketing at Southwestern Power Administration; Dr. John W. Wilson, economist for City of Brownsville; James D. Eiland, Manager at Cap Rock Electric Cooperative and Juan D. Nichols, Manager at Wood County Electric Cooperative.

E. Coordination services market:

1. Interviews in April 1979, and January 1980, of engineers at dispatch centers 1/ by Dr. Taylor;
2. Interview on January 15 or 16, 1980 of Mr. Soderberg, Chief Engineer, LCRA, and documents inspected at his offices by Dr. Taylor;
3. Discussion on February 8, 1980 with Dr. Wilson and Marc Poirier, Esquire, Counsel for City of Brownsville, by Dr. Taylor;
4. Inspection at LCRA of Reserve Sharing Agreement of the South Texas Interconnected System in April 1979 by Dr. Taylor;
5. Interview in April 1979 of Michael D. Spence, Vice President at Texas Power & Light Co., by Dr. Taylor;
6. Data summary sheets from utility submissions to TPUC inspected by Dr. Taylor at TPUC in January 1980 [copies are attached herewith as Exhibit B].

1/ North Texas Security Center, Texas Power & Light Co. dispatch center, South Texas Security Center, Central Power & Light Co. dispatch center, and Houston Lighting and Power Co. dispatch center.

7. Deposition testimony of D. E. Simmons, Vice President of Corporate Planning at HL&P (9/25/79); Burl B. Hulsey, Jr., President of Texas Utilities Co.; Charles Herring, General Manager at LCRA (Exhibits 9 & 10 of that deposition) and Walter M. Bowers, Division Chief of Power Marketing at Southwestern Pool Administration.

F. Transmission services market:

1. Interview in April 1979 of Michael D. Spence, Vice President at Texas Power & Light Co., by Dr. Taylor;
2. Interview on January 15 or 16, 1980, of Mr. Soderberg, Chief Engineer at LCRA, by Dr. Taylor;
3. Interview in April 1979 of William E. West, Jr., Systems Operation Manager of the Systems Operation Control Center at LCRA, by Dr. Taylor;
4. Discussion on February 8, 1980, with Dr. Wilson and Marc Poirier, Esquire, Counsel for City of Brownsville, by Dr. Taylor;
5. Deposition testimony in these proceedings of: Walter M. Bowers, Division Chief of Power Marketing at Southwestern Power Administration and Charles Herring, General Manager, LCRA.

Exhibit C, attached hereto is a copy of the source of data used by Dr. Taylor as a basis for Appendix A, B and C of the Department's Supplemental Interrogatory Responses filed on February 1, 1980.

Respectfully submitted,


Susan Braden Cyphert

Washington, D. C.
March 13, 1980

Attorney, Energy Section
Antitrust Division
U.S. Department of Justice
Telephone No.: 202-724-6667

Industrial

EXHIBIT A

Annual Survey of Manufactures 1976
U.S. Dept. of Commerce

1977 Annual Statistical Report
Rural Electric Co-operators
REA Bulletin 1-1
U.S. Department of Agriculture
Rural Electrification Administration

~~Industrial Commission of Texas~~

1978-1979 Directory of Texas Manufacturers
Bureau of Business Research
University of Texas at Austin

Texas Industrial Expansion
Bureau of Business Research
University of Texas at Austin
September 1978

"A Texas location lets you live better for less"
Texas Industrial Commission

Texas Facts. The book on profitable plant locations
Texas Industrial Commission

Industrial Revenue Bond Financing in Texas
Texas Industrial Commission

Texas Business, April 1979

Executive Digest, Texas Association of Business
Vol. 12 No. 1 January 5, 1976

Texas Labor Market Review Nov. 1979
Texas Employment Commission

Community Data Profile
Texas Industrial Commission

POOR ORIGINAL

EXHIBIT B
CITY OF AUSTIN

<u>YEAR</u>	<u>NET CAPABILITY (MW)</u>	<u>PEAK DEMAND (MW)</u>	<u>RESERVE %</u>	<u>ADDITIONS/RETIREMENTS (MW)</u>
79	1,675	743	125.0	Fayette 1 - 275
80*	1,950	1,317	48.0	Fayette 2 - 275
81*	1,910	1,362	40.2	40 (retire)
82*	1,910	1,407	35.7	-
83*	1,910	1,460	30.8	-
84*	2,110	1,516	39.2	STP 1 - 200
85*	2,070	1,591	39.1	40 (retire)
86	2,270	1,175	93.2	STP 2 - 200
87	2,270	1,265	79.4	-
88	2,230	1,353	64.8	40 (retire)
89	2,230	1,449	53.9	-

* Includes 500 MW of firm sales to HL&P.

BRAZOS ELECTRIC POWER COOP

YEAR	NET CAPABILITY* (MW)		PEAK DEMAND (MW)	RESERVE %	ADDITIONS/RETIREMENTS (MW)
79	-		- 671 x .93 = 624	-	-
80	772	(189)**	671	15.0	-
81	896	-	730	22.7	San Miguel 1 - 270 Comanche Peak 1 - 44
82	913	(17)	794	15.0	-
83	994	(64)	864	15.0	Comanche Peak 2 - 44
84	1,081	(166)	940	15.0	-
85	1,176	(278)	1,023	15.0	-
86	1,280	(195)	1,113	15.0	Unknown - 200
87	1,393	(123)	1,211	15.0	Unknown - 200
88	1,516	(246)	1,318	15.0	-
89	1,649	(179)	1,434	15.0	Unknown - 200

* Includes varying amounts of purchase power.

** purchase power

CENTRAL POWER & LIGHT COMPANY

YEAR	NET CAPABILITY (MW)		PEAK DEMAND (MW)	RESERVE %	ADDITIONS/RETIREMENTS (MW)
79	2,986	(10) purchase	2,331	28.1	-
80	3,496	~	2,525	38.5	Coleta Creek 1 - 550 430 (retire)
81*	3,496	(28) sales	2,654	30.7	-
82*	3,496	(79)s	2,915	17.2	-
83*	3,496	(95)s	3,037	12.0	-
84*	3,811	(178)s	3,167	14.7	STP 1 - 315
85*	3,811	(105)s	3,309	12.0	-
86*	4,126	(138)s	3,468	15.0	STP 2 - 315
87	4,098		3,630	12.9	Okal Union - 118 146 (retire)
88	4,485		3,797	18.1	Coleta Creek 2 - 228 Karnack - 228 69 (retire)
89	4,699		4,005	17.3	Walker County - 214

* Includes varying amounts of firm sales to West Texas Utilities Company.

CITY PUBLIC SERVICE BOARD OF SAN ANTONIO

YEAR	NET CAPABILITY (MW)	PEAK DEMAND (MW)	RESERVE %	ADDITIONS/RETIREMENTS (MW)
79*	3,034 (90)	1,914 ^{80%} ₁₈₇₄	58.5	-
80*	3,034 (98)	1,949	55.7	-
81	3,034	1,979	53.3	-
82	3,034	2,157	40.7	-
83	3,034	2,339	29.7	-
84	3,384	2,489	35.9	STP 1 - 350
85	3,384	2,643	28.0	-
86	3,734	2,783	34.2	STP 2 - 350
87	3,734	2,928	27.5	-
88	3,734	3,088	20.9	-
89	4,234	3,236	30.8	Unknown Lignite - 500

* Includes firm sales to other utilities.

DALLAS POWER & LIGHT COMPANY

<u>YEAR</u>	<u>NET CAPABILITY (MW)</u>	<u>PEAK DEMAND (MW)</u>	<u>RESERVE %</u>	<u>ADDITIONS/RETIREMENTS (MW)</u>
79	4,056	2,681	51.3	Martin Lake 3 - 188
80	3,953	2,792	51.6	33 (retire) 70 (retire)
81	4,106	2,902	41.5	Comanche Peak 1 - 268 115 (retire)
82	4,036	3,011	34.0	70 (retire)
83	4,230	3,119	35.6	Comanche Peak 2 - 268 75 (retire)
84	4,380	3,227	35.7	Forest Grove 1 - 150
85	4,567	3,353	36.2	Martin Lake 4 - 188
86	4,480	3,483	28.6	87 (retire)
87	-	-	-	-
88	-	-	-	-
89	-	-	-	-

EL PASO ELECTRIC COMPANY

<u>YEAR</u>	<u>NET CAPABILITY (MW)</u>		<u>PEAK DEMAND (MW)</u>	<u>RESERVE %</u>	<u>ADDITIONS/RETIREMENTS (MW)</u>
79*	960	(75)s	718	23.3	-
80	1,033		775	33.3	Copper Station 1 - 73
81	1,033		845	22.2	-
82	1,033		909	13.6	-
83	1,229		984	24.9	Palo Verde 1 - 200 4 (retire)
84*	1,403	(99)s	1,038	26.2	Palo Verde 2 - 200 26 (retire)
85*	1,403	(93)s	1,113	17.7	-
86*	1,603	(93)s	1,166	29.5	Palo Verde 3 - 200
87*	1,603	(93)s	1,223	23.5	-
88*	1,603	(44)s	1,275	22.3	-
89*	1,585	(44)s	1,336	15.3	18 (retire)

* Firm sales to other utilities.

GULF STATES UTILITIES COMPANY

YEAR	NET CAPABILITY* (MW)		PEAK DEMAND (MW)	RESERVE %	ADDITIONS/RETIREMENTS (MW)
79	6,189	(635)p	5,477	13.0	66 (retire)
80	6,492	(458)p	5,511	15.7	Sabine 5 - 480
81	6,654	(620)p	5,942	12.0	-
82	7,024	(450)p	6,274	12.0	Nelson 6 - 540
83	7,449	(605)p	6,651	12.0	Big Cajun 3 - 270
84	7,790	(382)p	6,950	12.1	River Bend 1 - 564
85	8,371	(288)p	7,367	13.6	Cajun Lignite 1 - 135 Nelson 5 - 549
86	9,012	(794)p	7,809	15.4	Lignite 1, 2, 3 - 600 Cajun Lignite 2 - 135
87	9,518	(100)p	8,262	15.2	Lignite 4, 5, 6 - 600
88	10,118	(100)p	8,741	15.8	Unknown -600
89	-		-	-	-

* Includes varying amounts of purchase power.

HOUSTON LIGHTING & POWER COMPANY

YEAR	NET CAPABILITY (MW)		PEAK DEMAND (MW)	RESERVE %	ADDITIONS/RETIREMENTS (MW)
79	11,193		9,725	15.1	W.A Parish 6 - 660
80*	12,263	(500) _p	10,150	20.8	W A Parish 7 - 570
81*	12,263	(500) _p	10,575	16.0	-
82*	12,563	(800) _p	10,950	14.7	-
83*	13,103	(800) _p	11,375	15.2	W A Parish 8 - 540
84*	13,938	(500) _p	11,925	16.9	STP 1 - 385 Unknown - 750
85*	14,410	(500) _p	12,425	16.0	Lignite 1 - 700 228 (retire)
86	14,995		12,900	16.2	STP 2 - 385 Lignite 1 - 700
87	16,825		13,325	26.3	Allen's Creek 1 - 1,130 X Lignite 1 - 700
88	17,525		13,775	27.2	X Lignite 2 - 700
89	17,525		14,250	23.0	-

* Includes varying amounts of purchase power.

LOWER COLORADO RIVER AUTHORITY

<u>YEAR</u>	<u>NET CAPABILITY (MW)</u>	<u>PEAK DEMAND (MW)</u>	<u>RESERVE %</u>	<u>ADDITIONS/RETIREMENTS (MW)</u>
79	1,478	990	49.3	Fayette 1 - 275
80	1,753	1,063	60.6	Fayette 2 - 275
81	1,753	1,141	53.6	-
82	1,753	1,225	43.1	-
83	1,753	1,315	33.3	-
84	1,753	1,412	24.2	-
85	1,753	1,516	15.6	-
86	2,153	1,627	32.3	Fayette 3 - 400
87	2,153	1,747	23.2	-
88	2,153	1,876	14.8	-
89	2,553	2,015	26.7	Unknown - 400

SOUTHWESTERN ELECTRIC POWER COMPANY

<u>YEAR</u>	<u>NET CAPABILITY (MW)</u>	<u>PEAK DEMAND (MW)</u>	<u>RESERVE %</u>	<u>ADDITIONS/RETIREMENTS (MW)</u>
79	2,614 (2,614)	2,230	17.2	-
80	3,042	2,437	24.8	Welsh 2 - 528
81	3,152	2,653	18.8	-
82	3,620	2,863	26.4	Welsh 3 - 528
83	3,655	3,083	18.6	106 (retire)
84	4,281	3,318	29.0	Pirkey 1 - 640
85	4,304	3,573	20.5	-
86	4,530	3,843	17.9	Dolet Hills 1 - 320 36 (retire)
87	4,638	4,088	13.5	Waggoner Ranch 1 - 50 38 (retire)
88	5,132	4,343	18.2	Karnack 1 - 266 Coletto Creek - 266 36 (retire)
89	5,413	4,613	17.3	Walker County 1 - 317

* SOUTHWESTERN PUBLIC SERVICE COMPANY

<u>YEAR</u>	<u>NET CAPABILITY*</u> <u>(MW)</u>		<u>PEAK DEMAND</u> <u>(MW)</u>	<u>RESERVE</u> <u>%</u>	<u>ADDITIONS/RETIREMENTS</u> <u>(MW)</u>
79	2,787	(66) p	2,024	37.5	CZ-2 - 30
80	3,125	"	2,571	31.5	Harrington 3 - 338
81	3,125	"	2,743	13.9	-
82	3,653	"	2,920	25.1	Tolk 1 - 528 5.6 (retire)
83	3,647	"	3,109	17.3	24.8 (retire)
84	3,622	"	3,295	9.9	-
85	4,150	"	3,491	18.9	Tolk 2 - 528
86	4,150	"	3,700	12.2	11.3 (retire) 8 (retire)
87	4,731	"	3,920	20.7	Roberts 1 - 60
88	4,731	"	4,154	13.9	19.5 (retire) 10 (retire)
89	5,320	"	4,388	20.9	Roberts 2 - 600

* Includes varying amounts of firm sales and purchases.

TEXAS ELECTRIC SERVICE COMPANY

YEAR	NET CAPABILITY (MW)	PEAK DEMAND (MW)	RESERVE %	ADDITIONS/RETIREMENTS (MW)
79	6,023	4,000	50.6	Martin Lake 3 - 338
80	5,997	4,203	42.7	26 (retire)
81	6,381	4,416	44.5	Comanche Peak 1 - 383
82	6,336	4,636	36.7	45 (retire)
83	6,697	4,867	37.6	Comanche Peak 2 - 383 22 (retire)
84	6,997	5,109	37.0	Forest Grove 1 - 450 150 (retire)
85	7,043	5,362	31.4	Martin Lake 4 - 338 292 (retire)
86	-	-	-	-
87	-	-	-	-
88	-	-	-	-
89	-	-	-	-

TEXAS POWER AND LIGHT COMPANY

<u>YEAR</u>	<u>NET CAPABILITY*</u> <u>(MW)</u>	<u>PEAK DEMAND</u> <u>(MW)</u>	<u>RESERVE</u> <u>%</u>	<u>ADDITIONS/RETIREMENTS</u> <u>(MW)</u>
79	7,353	4,732	55.4	-
80	7,353	5,500	33.7	-
81	8,281	6,240	32.7	Sandow 4 - 545 Comanche Peak 1 - 383
82	8,281	6,630	24.9	-
83	8,664	7,030	23.2	Comanche Peak 2 - 383
84	8,814	7,450	18.3	Forest Grove 1 - 150
85	9,652	7,910	22.0	Twin Oak 1 - 563 Martin Lake 4 - 225
86	10,264	8,390	22.3	Twin Oak 2 - 563
87	10,457	8,910	17.4	Unannounced - 263 70 (retire)
88	10,737	9,450	13.6	Unannounced - 140 Unannounced - 250 110 (retire)
89	11,122	10,012	11.1	Unannounced - 375 Unannounced - 250 240 (retire)

* Includes varying amounts of purchase power.

WEST TEXAS UTILITIES

YEAR	NET CAPABILITY* (MW)		PEAK DEMAND (MW)	RESERVE %		ADDITIONS/RETIREMENTS (MW)
79	1,065	(11) p	819	30.0		-
80	1,068	(14) p	937	14.0	131	-
81	1,102	(48) p	985	11.9		-
82	1,153	(99) p	1,030	11.9		-
83	1,203	(149) p	1,075	11.9		-
84	1,259	(205) p	1,125	11.9		-
85	1,314	(260) p	1,174	11.9		-
86	1,366	(312) p	1,223	11.7		-
87	1,439	1439 (20) p	1,277	12.7		Okla Union - 365
88	1,573	(22) p	1,335	17.8		Karnack - 96 Coleta Creek 2 - 96 60 (retire)
89	1,633	(23) p	1,395	17.0		Walker County 1 - 59

* Includes varying amounts of firm purchase power.

EXHIBIT C

Source of data:

Appendix A and Appendix B.

- 1) FERC Form 12
- 2) Statistics of Privately Owned Electric Utilities in the United States 1977
Classes A and B Companies
January 1979 U.S. Dept. of Energy
- 3) Statistics of Publicly Owned Electric Utilities in the United States 1977
February 1979 U.S. Dept. of Energy
- 4) 1977 Annual Statistical Report
Rural Electric Borrowers
REA Bulletin 1-1
U.S. Dept. of Agriculture - R.E.A.
- 5) Electrical World Directory of Electric Utilities 1978-1979 New York, N.Y. 1978

Appendix C

Data supplied by the Texas Public Utilities Commission compiled from utility submissions. (enclosed)

POOR ORIGINAL

March 10, 1980

DAK:SBC
60-415-105

HAND-DELIVERED

Dr. Gordon Taylor
Suite 304
2600 Virginia Avenue, N.W.
Washington, D.C. 20037

Dear Gordon:

Attached are the franchises received to date and a list describing such franchises.

Sincerely yours,

Susan Braden Cyphert
Attorney
Energy Section
Antitrust Division

Attachment

Franchises received as of March 10, 1980

Denison - TP&L	25 yrs
Clute - HL&P	50 yrs
Farmers Branch - TP&L	45 yrs
Forney - TP&L	50 yrs
Eules - TP&L	50 yrs
Bedford - TP&L	50 yrs
Jersey Village - HL&P	50 yrs
Galveston - HL&P	annually
Balch Springs - TP&L	50 yrs
Brownwood - TP&L	20 yrs
Athens - TP&L	20 yrs
Richwood - HL&P	50 yrs
Pasadena - HL&P	50 yrs
Bellaire - HL&P	50 yrs
Humble - HL&P	50 yrs
Seabrook - HL&P	50 yrs
Missouri City - HL&P	50 yrs
Lomax - HL&P	50 yrs
Addison - TP&L	50 yrs
Belton - TP&L	25 yrs
Allen - TP&L	50 yrs
Grapevine - TP&L	50 yrs
De Soto - TP&L	50 yrs



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

March 12, 1980

Address Reply to the
Division Indicated
and Refer to Initials and Number

DAK:SBC
60-415-105

HAND DELIVERED

Dr. Gordon Taylor
Suite 304
2600 Virginia Avenue, N.W.
Washington, D.C. 20037

Dear Dr. Taylor:

Attached are franchises received to date along with a
list describing such franchises.

Sincerely yours,

Susan Braden Cyphert
Attorney
Energy Section
Antitrust Division

Attachment

Franchises received March 12, 1980

Ft. Worth	TESCO	10 years
Breckenridge	TESCO	30 years
Duncanville	TP&L	50 years
Forest Hill	TESCO	50 years
Eastland	TESCO	50 years
Arlington	TESCO	30 years
Edgecliff	TESCO	50 years
Seymour	TESCO	10 years
Cedar Hill	TP&L	50 years
Iowa Park	TESCO	10 years
Henrietta	TESCO	40 years
Benbrook	TESCO	99 years
Magnolia	HL&P	50 years
Katy	HL&P	50 years
Hillsboro	TP&L	20 years

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
HOUSTON LIGHTING AND POWER)	Docket Nos. 50-498A
CO., et al. (South Texas)	50-499A
Project, Units 1 and 2))	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445A
COMPANY (Comanche Peak)	50-446A
Steam Electric Station,)	
Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing Third Supplemental Response of Department of Justice to Houston Lighting & Power Company First Set of Interrogatories and Requests for Production of Documents has been made on the following parties listed hereto this 13th day of March, 1980, by depositing copies thereof in the United States mail, first class, postage prepaid.

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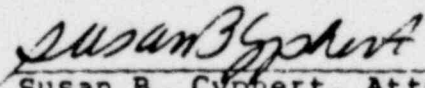
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