80 051 40 097/

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

PACIFIC GAS and ELECTRIC COMPANY

(Stanislaus Nuclear Project,
Unit No. 1)

Docket No. P-564A

MOTION FOR EXTENSION OF TIME TO SUBMIT INTERROGATORY RESPONSES FROM THE NCPA MEMBER CITY OF SANTA CLARA, CALIFORNIA

Northern California Power Agency and its members ("NCPA") hereby move for an extension of the date for one of NCPA's twelve members, the City of Santa Clara, California, to file its individual responses to "Pacific Gas and Electric Company's Fifth Set of Interrogatories to Northern California Power Agency and Department of Water Resources and Fourth Set of Interrogatories to the Cities of Anaheim and Riverside," dated July 19, 1979.

NCPA's interrogatory responses, including individual responses from each of its twelve members are presently due on March 3, 1980. 1/ NCPA is serving on March 3, 1980 complete responses from NCPA itself and from its members, the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Ukiah, California and the Plumas-Sierra Rural Electric Cooperative. The responses from Santa Clara are in the final stages of preparation, but due to

Plo 156

^{1/ &}quot;Order Directing NCPA to Answer PG&E's Fifth Set of Interrogatories," January 16, 1980.

unavoidable delays in coordinating among the necessary persons and in transmitting documents, and due to the need for NCPA's attorneys who have been working on these responses to attend to problems associated with PG&E's current discovery of NCPA's Cities' files, the responses are not yet complete.

For the foregoing reasons, NCPA respectfully requests that the date for filing the responses of the City of Santa Clara be extended for ten days.

Respectfully submitted,

Thomas C. Trauger Thomas C. Trauger

Attorney for Northern California Power Agency and its members

March 3, 1980

Law Offices of: Spiegel & McDiarmid 2600 Virginia Avenue, N.W. Washington, D.C. 20037

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter Of:)
Pacific Gas and Electric Company) NRC Docket No. P-564-A
(Stanislaus Nuclear Project, Unit No. 1)	

CERTIFICATE OF SERVICE

I hereby certify that copies of this March 3, 1980 MOTION FOR EXTENSION OF TIME TO SUBMIT INTERROGATORY RESPONSES FROM THE NCPA MEMBER CITY OF SANTA CLARA, CALIFORNIA, and this certificate were served upon each of the following by deposit in the United States mail, first class postage prepaid, this 3rd day of March, 1980.

McCutchen, Doyle, Brown & Enerson Morris M. Doyle Terry J. Houlihan William H. Armstrong Meredith J. Watts Three Embarcadero Center San Francisco, California 94111

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Steven R. Cohen
Edward J. Terhaar
Department of Water Resources
1416 9th Street
P.O. Box 388
Sacramento, California 95802

Gordon W. Hoyt
Utilities Director
City of Anaheim
P.O. Box 3222
Anaheim, California 92803

Malcolm H. Furbush
Philip A. Crane, Jr.
Jack F. Fallin, Jr.
Richare L. Meiss
77 Beale Street
San Francisco, CA 94106

Marshall E. Miller,
Chairman
Atomic Safety & Licensing
Bpard
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety & Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Joseph J. Saunders, Esq. Antitrust Division U.S. Department of Justice Washington, D.c. 20530

Everett C. Ross PUC Director City Hall 3900 Main Street Riverside, California 92501

Mark Levin, Esq.
Antitrust Division
U.S. Department of Justice
Washington, D.C. 20530

Sheldon J. Wolfe, Esq.
Atomic Safety & Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Michael J. Strumwasser
Deputy Attorney General of
California
3580 Wilshire Blvd., Suite 600
Los Angeles, California 90010

Clarice Turney, Esq.
Office of the City Attorney
3900 Main Street
Riverside, California 92521

Jerome Saltzman, Chief Antitrust and Indemnity Group U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Seymour Wenner, Esq.
Atomic Safety and
Licensing Board
807 Morgan Drive
Chevy Chase, Md. 20015

Joseph Rutberg, Esq.
Benjamin H. Vogler, Esq.
Jack R. Goldberg, Esq.
Frederic D. Chanania, Esq.
NRC Staff Counsel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

H. Chester Horn, Jr.
Deputy Attorney General
Office of the Attorney
General
3580 Wilshire Boulevard
Suite 800
Los Angeles, CA 90010

Thomas C. Trauger
Thomas C. Trauger