

The Company did not receive a copy of the Request until the end of last week and has therefore had only four working days to date to consider the proposal. We are advised that, because of its length and complexity and its relevance to virtually every phase of the Company's electric operations, it will have to be reviewed by a large number of Company officials. The Company needs a minimum of ten additional working days to analyze the Request with the thoroughness that it requires.

To expedite the discovery process, we are today informing the Department (through the attached letter) of the presently-apparent deficiencies of its Request. However, the letter reserves Applicant's right to raise other objections by March 12, 1973, should analysis by Company personnel reveal other difficulties with these requests.

Since Applicant is prepared to respond to the unchallenged requests for admissions by April 2, 1973, the requested extension of time will not delay the discovery process of this proceeding.

WHEREFORE, Applicant respectfully moves the Board to extend time for filing objections to the Department's

Request for Admissions to March 12, 1973.

Respectfully submitted,

Wm. Warfield Ross

Keith S. Watson

Toni K. Golden

Of Counsel:

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February 23, 1973

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In the Matter of)
) Docket Nos. 50-329A
CONSUMERS POWER COMPANY) and 50-330A
(Midland Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of APPLICANT'S MOTION TO EXTEND TIME TO OBJECT TO DEPARTMENT OF JUSTICE REQUEST FOR ADMISSIONS, dated February 23, 1973, in the above-captioned matter have been served on the following by deposit in the United States mail, first class or air mail, this 23rd day of February, 1973:

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