

Definitions and Directions

1. "Electric utility" and "utility" means any private corporation, cooperative or membership corporation, municipality, or any political subdivision, agency or instrumentality of the Federal or any state or municipal government which owns or controls facilities for the generation, transmission or distribution of electrical power and energy, or which in the past has done so.

2. "Coordination" and "coordinating" shall include, but are not limited to, reserve sharing, economic dispatch or economic interchange, and pooling of load growth for joint or staggered additions of generating or transmission facilities.

3. "Integration" and "integrating" shall mean the coordination or coordinating of bulk power supply facilities by a single utility or by two or more utilities owned or controlled by a common entity or common financial interest.

4. "Municipality" shall mean each city, town, village or other political subdivision, incorporated or unincorporated, in which the system principally provides electric service.

5. The account titles used herein shall be defined as in the Uniform System of Accounts Prescribed for Public Utilities and Licensees (Class A and B).

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6. In all cases where answers are requested by years, indicate whether the information is provided on a calendar or fiscal year basis. Such basis shall be the usual accounting period used by the system. If answers are given on a fiscal year basis, state the day on which each fiscal year ended.

7. Answers referring to documents shall be accompanied by all such documents dated since January 1, 1960.

8. If any question is inapplicable, so state and provide a brief explanation of why it is inapplicable.

9. As hereinafter used, "document request" refers to those requests for documents which were served upon respondent pursuant to an Atomic Energy Commission subpoena at the behest of Consumers Power Company.

Initial Interrogatories

1. Define in detail the customer characteristics required for service under each rate schedule, tariff, rate contract or agreement provided in response to document request 1(c), to the extent that said document responses do not reflect this information.

2. (a) Identify all electric rate schedules, tariffs and rate contracts or agreements furnished in response to document request 1(c) under which five or fewer customers were served in 1971 or 1972.

The interrogatories are submitted in their present form in order to obviate any inconvenience to the individual deponents, who may not have access to the transcript to which the Board's aforementioned Order refers in its rulings concerning the interrogatories (pp. 3-4). The modifications directed by the Board in its Order (Section B, II) are thus incorporated in the interrogatories attached hereto.

In addition, the attached interrogatories include the following items which the Board granted Applicant leave to reword and resubmit: 4(Tr. 237-38); 6(Tr. 243-44); 7(b)(Tr. 245-47); 8(Tr. 248-49); 12(Tr. 254-55); 37(Tr. 280-81); 38(Tr. 283); 40(c)(Tr. 284); 41(Tr. 284); 49(Tr. 300); 75 and 76 (Tr. 317-18); and 79(Tr. 318-19). Questions to which the Board sustained objection or which Applicant withdrew without leave to resubmit are, of course, deleted from the attached interrogatories.

Wherefore, Applicant moves the Board for an order compelling appropriate deponents for the aforementioned twenty-one municipal electric systems to respond to the

(b) State the name and address of each customer so served and for each year 1960 to date state each such customer's annual peak demand, annual kilowatt-hour consumption and the gross annual electric revenues received by the system from such customer.

(c) For each rate schedule, tariff, rate contract or agreement identified in subparagraph (a), state the number of customers served thereunder in each year 1960 through 1971 and provide the name and address of each such customer.

3. State whether in the period 1960 to date, the system has proposed, or discussed the possibility of proposing to any customer or other person any electric rate schedule, tariff, rate contract or agreement, conditions and terms of service or any other statement of rates other than those furnished in response to document request 1(c). If so, state (i) the name and address of each such customer or person (ii) the date of each such proposal or discussion (iii) the rates or conditions of service discussed or proposed by the system (iv) in what way each such rate or condition of service differed from the rate or condition of service identified in document request 1(c) which was applicable to such customer or person and (v) whether (and, if so, for what time period) each such customer or person was

attached interrogatories by the close of business,
April 2, 1973.

Respectfully submitted,

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served by the system under the rates or conditions of service referenced in 3(iii), supra.

4. State the adjustment level of each fuel, purchased power, materials, commodity, tax, age, or other adjustment clause or surcharge applicable on January 1 of 1960, 1965, 1970, 1972 and 1973, and June 30, 1972, and explain the basis on which each adjustment was determined.

5. State the effective date and describe the substance of each change made in any rate schedule, tariff, contract, agreement or terms and conditions of service at any time during the period January 1, 1960 to date. State the contemplated effect and actual effect on revenues of each change in dollar terms.

6. For each of the dates January 1, 1960, January 1, 1965, January 1, 1970, January 1, 1972, and June 30, 1972, state the typical net monthly bills for electric service employing the assumptions and definitions set forth in Attachment A for the following customer classification and monthly demand-energy combination (designate the rate schedule used for each calculation and identify any discount or special charge):

(a) Residential

(i) minimum bill and number of kilowatt-hours included; indicate the number of minimum bills rendered

each month of each of these years;

- (ii) 100 kilowatt-hours;
- (iii) 250 kilowatt-hours;
- (iv) 500 kilowatt-hours;
- (v) 750 kilowatt-hours;
- (vi) 1,000 kilowatt-hours.

(b) Commercial

- (i) 3.0 kilowatt-375 kilowatt-hours;
- (ii) 6.0 kilowatts-750 kilowatt-hours;
- (iii) 12.0 kilowatts-1,500 kilowatt-hours;
- (iv) 30.0 kilowatts-6,000 kilowatt-hours;
- (v) 40.0 kilowatts-10,000 kilowatt-hours.

(c) Industrial

- (i) 75 kilowatts-15,000 kilowatt-hours;
- (ii) 75 kilowatts-30,000 kilowatt-hours;
- (iii) 150 kilowatts-30,000 kilowatt-hours;
- (iv) 150 kilowatts-60,000 kilowatt-hours;
- (v) 300 kilowatts-60,000 kilowatt-hours;
- (vi) 300 kilowatts-120,000 kilowatt-hours;
- (vii) 500 kilowatts-100,000 kilowatt-hours;
- (viii) 500 kilowatts-200,000 kilowatt-hours;
- (ix) 1,000 kilowatts-200,000 kilowatt hours;
- (x) 1,000 kilowatts-400,000 kilowatt-hours;
- (xi) 2,500 kilowatts-1,000,000 kilowatt-hours;

(xii) 5,000 kilowatts-2,000,000 kilowatt-hours.

[In place of the foregoing response, respondent may state the system's rate schedules and adjustment levels and may designate what rate schedule should be utilized in the computation of each bill. Only such information sufficient to enable Applicant to compute each of the aforementioned monthly bill analyses will be deemed a proper response to request 6.]

7. (a) For each township or incorporated area served by the system, state the name and address of the five largest industrial and five largest commercial customers (in terms of consumption of the largest number of kilowatt hours of electricity supplied by the system) which the system has served since 1960.

(b) For each customer named in 7(a) state for the year 1972 (or the most recent year for which information is available) the following:

(i) kilowatt-hour sales to the customer;

(ii) revenues derived from the customer;

(iii) the customer's peak demand, the month in which that peak occurred, and the customer's demand in the month of the system's peak;

(iv) the annual load factor for the customer in the month of the customer's peak demand and

in the month of the system's peak;

(v) applicable rate schedules for service to the customer;

(vi) the minimum monthly charge applicable to the customer;

(vii) the voltage at which service was provided to the customer.

(c) State to what extent the 7(b) information for the years 1960 to 1971 is contained in (or is available from) the system's records.

8. (a) State the present length and voltage of each transmission or distribution line running from the bulk power supply delivery point or common supply facility to each customer identified in response to Interrogatory 7(a). Describe each delivery point used to serve such customers.

(b) State separately the date and cost of constructing each line from 1960 to date and state the cost and description of each related facility required to deliver power to each such customer from 1960 to date.

9. (a) State whether the system or the municipality in which it serves, or any agency or department of that municipality, at any time from January 1, 1960 to date has had an industrial development department or an individual or a group of individuals which has engaged

in activities or other efforts, alone or with any other person or entity, designed to attract commercial and/or industrial facilities to locate in the municipality or within the area served by its electric facilities. If so:

(i) state the name and address of such department or individual(s);

(ii) state the name and address of each person in charge of such activities or other efforts during the period January 1, 1960 to date, together with the dates during which such person held such position;

(iii) state the name and address of any person or other entity with whom the system engaged in such activities or other efforts and the dates during which it did so.

(b) State whether the system or the municipality in which it serves, or any agency or department of that municipality, at any time from January 1, 1960 to date has retained, employed or consulted with any person or organization to advise on, investigate or in any way conduct activities or other efforts designed to attract commercial and/or industrial facilities to locate in the municipality or within the area served by its electric facilities. If so, state the name and address of each

person or organization employed, retained or consulted with for this purpose during the period January 1, 1960 to date, together with name of the entity by whom and the dates during which such person or organization was employed, retained or consulted.

(c) Describe in detail the activities or other efforts undertaken during the period January 1, 1960 to date by the system or the municipality in which it serves, or any agency or department of that municipality, or by any person or other entity employed, retained or consulted by or on behalf of the system or the municipality or any of its agencies or departments, to attract commercial and/or industrial facilities to locate in the municipality or within the area served by any of its sewage, gas, water, or electric facilities, specifying in each case the name of the entity conducting such activity or other efforts and the dates relevant thereto.

10. Describe in detail the extent to which the system or the municipality or any agency or department thereof, has, from 1960 to date, prepared, or caused to be prepared, surveys, made site investigations or engaged in, or caused others to engage in, other activities or other efforts for the purpose of encouraging increased use of electricity or to analyze the potential for locating

commercial and/or industrial facilities in the area served with electric power or other utility services by the system.

11. [Deleted].

12. State whether the municipality in which the system serves has, or had at any time during the period January 1, 1960 to date, an ordinance or other statute, regulation, rule, order, policy or practice requiring that any person or any class of persons inside or outside the corporate limits purchase electricity from the system. If so, describe in detail the nature of each requirement in effect since 1960 to the extent that responses to document request 13 do not provide such a detailed description.

[13 to 15 deleted].

16. (a) State the system's operating revenues, excluding any sales tax receipts, for 1961, 1966, and 1971.*

(b) State whether the figures provided include an imputation for the value or cost of services donated to or provided to the municipality or any of its agencies or departments. If so:

* In response to this Interrogatory and to all others indicated by an asterisk use the same time period as was used in response to Interrogatory 16; e.g., if calendar years were used there, use calendar years; if fiscal years ending June 30, use fiscal years ending June 30. Also, answers provided for "1961, 1966, and 1971" require a separate total for each year.

(i) state the amount of any such imputation;

(ii) state whether each amount is classified as a tax equivalent.

17. (a) State the system's operating expenses for 1961, 1966, and 1971.*

(b) State whether the figures provided in response to Interrogatory 17(a) include an imputation for the value or cost of services donated to or provided to the municipality or any of its agencies or departments. If so:

(i) state the amount of any such imputation;

(ii) state how that value was determined;

(iii) state whether this amount is classified as a tax equivalent;

(iv) state whether this imputation is included in the system's operating revenue figures furnished in response to Interrogatory 16.

18. State the annual depreciation and amortization expense applicable to the system's electric plant(s) for 1961, 1966, and 1971.* State the basis on which such expenses were calculated.

19. State the amount of taxes paid which are

applicable to electric operations for 1961, 1966, and 1971.*

- (a) Classify such taxes by type (e.g., local property, franchise, federal income, etc.);
- (b) State to whom paid;
- (c) State on what date each tax was paid;
- (d) State whether these taxes are included for each year in the system's operating expense data furnished in response to Interrogatory 17. If so, state for what year and under what account designation.

20. (a) State the amount of tax equivalents for 1961, 1966, and 1971.* (As used herein "tax equivalent" is defined as set forth in FPC Form 1-M.)

(b) Describe in detail each service provided by the system or payment made by the system which is classified by the system as tax equivalents and set forth:

(i) the estimated value given to each such service in each year;

(ii) the method by which the value of any service donated to or provided to the municipality or any of its agencies or departments was determined;

(iii) whether each amount specified in response to subparagraphs (a) and (b) of this Interrogatory is included in the operating revenue and expense data furnished in answer to Interrogatories 16 and 17, respectively.

21. (a) For the years 1961, 1966, and 1971,* state the cost and estimated value of, and describe in detail each service donated to or provided to the municipality or any of its agencies or departments.

(b) For the years 1961, 1966, and 1971,* state the amount and date of each payment made to the municipality, or any of its agencies or departments, which is not classified as a tax equivalent but is included in the operating revenue and cost data furnished in response to Interrogatories 16, 17 and 20.

(c) For each payment specified in response to subparagraph (b) of this Interrogatory, state how the value of any service donated to or provided to the municipality or any of its agencies or departments was determined.

22. State the amount of the total funds transferred by the system to the general funds, or other account, of the municipality or to the account of any other municipal department or agency during 1961, 1966, and 1971.* In each case specify:

(a) the amount;

(b) title of the account to which such funds were transferred;

(c) the year in which such transfer was made;

(d) the year in which it is reflected in the data.

23. State the total kilowatt-hours supplied to the municipality and any of its agencies and departments by the system for 1961, 1966, and 1971* and the total revenues actually derived therefrom for each such year.*

24. State the price per kilowatt-hour paid by the municipality and any of its agencies and departments for electric energy supplied to it by the system during 1961, 1966, and 1971.*

25. State the system's total electric plant in service, accumulated provisions for depreciation of electric utility plant and net electric utility plant at the end of 1961, 1966, and 1971.*

26. (a) State the electric total generation and transmission (separate totals) plant in service and the accumulated provisions for depreciation of electric utility transmission plant at the end of 1961, 1966, and 1971.*

(b) For each year 1961, 1966, and 1971,* state the basis on which the system classified such facilities as generation or transmission plant.

27. (a) State the electric total distribution plant in service and the accumulated provisions for deprecia-

tion of electric utility distribution plant at the end of 1961, 1966, and 1971.*

(b) For 1961, 1966, and 1971,* state the basis on which the system classified such facilities as distribution plant.

29. State the total outstanding long-term debt attributable to electric utility operations at the end of 1961, 1966 and 1971* and state the type, the date of issuance, the maturity date, the principal amount and the interest rate of securities or other documents evidencing this debt as of each of said dates.

30. State the total outstanding short-term debt attributable to the electric utility operations at the end of 1961, 1966, and 1971* and state the type, the date of issuance, the maturity date, the principal amount and the interest rate of the securities or other documents evidencing this debt as of each of said dates.

31. (a) State the total interest, respectively, on long-term debt and on short-term debt attributable to electric utility operations during 1961, 1966, and 1971.*

(b) For 1961, 1966, and 1971,* state whether the amount of short-term interest specified in response to subparagraph (a) of this Interrogatory was included as an operating expense in data furnished in response to

Interrogatory 17. If not, state how much of such interest was included in the operating expense data.

32. [Deleted].

33. State the most recent credit rating applicable to debt instruments of the system (or the municipality., in the event that the system does not issue debt instruments or that there is no debt rating applicable to such instruments).

34. State the amount of construction work in progress-electric at the end of 1961, 1966, and 1971.*

35. State the amount of customer contributions in aid of electric plant construction at the end of 1961, 1966, and 1971.*

36. State the amount of each of the following expenses for 1961, 1966, and 1971:*

- (a) Customer accounts expenses;
- (b) Administrative and general expenses;
- (c) Distribution expenses;
- (d) Transmission expenses;
- (e) Production operation and maintenance expenses.

37. (a) State the effective date of and describe in detail each change in the system's accounting methodology or accounting definitions which affect the strict comparability between 1961, 1966, and 1971* of the answers in

response to Interrogatories 16 through 36 or to data furnished in document requests 1(a) and 1(b).

(b) If any such change has occurred, describe in detail how the information and data identified in 37(a) should be adjusted to reflect such changes and to achieve strict accounting comparability between the years 1961, 1966, and 1971.*

38. For 1961, 1966, and 1971,* if the system's accounting methodology or definitions reflect any activities or operations not related to electric service, describe:

(a) (i) The costs which are (or should be) allocated to the system's electric services and

(ii) the basis on which each cost is so allocated;

(b) Describe any allocation of general or common plant to the system's electric operations and the basis on which each such allocation was made.

39. For 1961, 1966, and 1971,* state the system's annual kilowatt-hour sales, average and year-end number of customers, and annual revenue, by class of customer (residential, commercial, industrial, other and ultimate):

(a) Within the municipality's corporate limits;

(b) For each township, incorporated or

unincorporated area served outside of the corporate limits of the municipality;

(c) Total used in response to Interrogatory 16.

40. (a) State in detail the basis used in each specified year for classifying customers into the residential, commercial, industrial and other classifications employed in response to Interrogatory 39.

(b) If this basis has been changed between 1961, 1966, and 1971,* state the date(s) on which such change(s) became effective and describe the substance of such change.

(c) As to such changes described in response to subparagraph (b) of this Interrogatory, state the information sought in Interrogatory 39 as adjusted for each such change in order to make such information comparable over the aforementioned time period.

41. State whether the answers, respectively, to Interrogatories 39 and 40, include customers counted more than once who are served by more than one meter and/or served under more than one rate schedule. If so, state average and year-end number of customers eliminating such duplication for each of the classes, service areas and time periods furnished in response to Interrogatory 39 and/or 40.

42. (a) State in detail the basis used by the system for categorizing customers into the "farm, excluding irrigation and drainage pumping", "irrigation and drainage pumping", "nonfarm-residential", "commercial", "industrial", and other classifications utilized in completing either Schedule 4 of the Federal Power Commission's (FPC) Form 12A for the years ending December 31, 1961, 1966, and 1971 and for Schedule 10 of the Federal Power Commission's Form 12 for the same years.

(b) State whether a different basis ever has been used in 1961, 1966 or 1971 for purposes of reporting to the FPC on Forms 12 or 12A. If so, state the date(s) on which such change(s) became effective and describe the substance of each such change.

43. State the number of customers and kilowatt-hour sales by customer class for each of the years ending December 31, 1961, 1966, and 1971, using the same customer classification and accounting method used in reporting to the FPC on Schedule 4 of Form 12A or Schedule 10 of Form 12 for the aforementioned years.

44. (i) State whether the answers to Interrogatory 43 include customers counted more than once who are served by more than one meter and/or served under more than one rate schedule.

(ii) If so, state average and year-end number of customers eliminating such duplication for each of the classes and time periods furnished in response to Interrogatory 43. (Interrogatory 44(ii) need be answered only to the extent that the information has already been compiled or is otherwise readily available to the system.)

45. (a) For each township or incorporated area served by the system, state the names and addresses (or identify each by an account number or otherwise) of the system's ten largest commercial and ten largest industrial customers in terms of annual kilowatt-hour consumption which ceased taking electric service from the system during the period 1960 to date. (In making this determination, use the kilowatt-hours consumed by each such customer in the full year preceding such termination.)

(b) State the reasons, if known, for the loss of each customer specified in response to subparagraph (a) of this Interrogatory, and the date each terminated service.

(c) State whether any service drops or other facilities were transferred by the system to any other electric supplier as a result of such termination. If so, specify:

(i) the facilities transferred;

(ii) the compensation, if any, received by the system for such transfer;

(iii) the date on which such transfer was made.

(d) If the customer is still located in the lower peninsula of Michigan, name the electric supplier who now serves each customer named in response to subparagraph (a) of this Interrogatory.

46. (a) For each township or incorporated area served by the system, state the names and addresses (or identify each by account number or other identification) of the system's ten largest commercial and ten largest industrial customers in terms of annual kilowatt-hour consumption which began taking electric service from the system during the period 1960 to date. (In making this determination, use the kilowatt-hours consumed by each such customer during 1971, or fiscal year 1972 if such fiscal year ended on or before June 30, 1972). Also, state the date on which service was initiated to each such customer.

(b) State which of such customers were acquired as a result of relocation into the service area of the system, from where each came and the utility previously supplying electricity to each such customer.

(c) As to each of those customers for which relocation was not involved, state:

(i) the electric utility formerly providing service to each of the customers in question;

(ii) the reasons for the change in electricity suppliers.

(d) State whether any service drops or other facilities were transferred by the utility formerly providing service to the system as a result of acquiring the new customer. If any transfer of facilities occurred, specify:

(i) the facilities transferred;

(ii) the compensation, if any, paid by the system;

(iii) the date on which such transfer was made.

47. State whether the system has refused, or declined to seek the opportunity, to provide electric service to any prospective industrial or commercial customer during the period January 1, 1960 to date. If so:

(a) Describe in detail the circumstances of each such refusal or decision;

(b) State the name, address, and estimated annual electric requirement and desired delivery voltage of each such customer and the present electric utility supplier of each such customer.

48. Describe each change in territory served with electricity by the system from January 1, 1960 to date, the classification and number of customers affected and annual kilowatt-hour sales to such customers.

49. Describe the geographic location of the systems' power plants, principal substations, power lines, all connections and transfer points with other systems, and the boundary line of the area served together with the communities therein supplied with electric energy. The description should include the following information:

(a) For each line of 12 kilovolts and above (and for any other line regardless of voltage which constitutes a tie line between generating stations or from generating stations to voltage systems of 12 kilovolts or above):

(i) the length in miles;
(ii) the voltage at which it is operated;
(iii) the voltage for which it is insulated if different than the operating voltage.

(b) For all alternating current lines:
(i) the number of cycles per second;
(ii) the phase (one-phase, two-phase, or three-phase).

(c) The rating and locations of transformer banks at power plants and principal substations including interconnections with other systems.

[In lieu of the foregoing, respondent may provide maps or other documents prepared for use by the system which show all of the information requested in this interrogatory. If maps are provided in response to this question, describe the scale of each such map.]

50. Describe any studies or other inquiries presently being prepared by or for the system concerning any matter identified in Document Request 5(a), and state the name of the person or other entity preparing the same and the expected completion date of each such study or other inquiry.

51. State the system's net generating capacity expressed in kilowatts as of year-end (calendar or fiscal) in 1961, 1966, and 1971.*

52. State the system's total annual kilowatt-hours generated, exclusive of station use, during 1961, 1966, and 1971.*

53. (a) State the system's number of pole miles of transmission facilities and the number of circuit miles of transmission facilities by voltage as of year-end 1960 and 1972 (or the most recent year available).

(b) If the basis for classifying such facilities differs from that used in response to Interrogatory 26:

(i) explain each change made and the reason for each such change;

(ii) answer subparagraph (a) of this Interrogatory on a comparable basis to the answer stated in response to Interrogatory 26.

54. (a) State the system's number of pole miles of distribution facilities and the number of circuit miles of overhead and underground distribution facilities as of year-end 1960 and 1972 (or the most recent year available).

(b) If the basis for classifying such facilities differs from that used in response to Interrogatory 27:

(i) Explain each change made and the reason for each such change;

(ii) Answer subparagraph (a) of this Interrogatory on a comparable basis to the answer stated in response to Interrogatory 27.

55. (a) State the system's number and capacity of transmission and distribution substations and transformer installations with capacity exceeding 12 kilovolts as of year-end 1960 through 1971.

(b) If the basis for classifying such facilities differs from that used in response to Interrogatories 26 or 27:

(i) explain each change made and the reason for each such change;

(ii) answer subparagraph (a) of this Interrogatory on a basis which is comparable to answer stated in response to Interrogatories 26 and 27.

56. State whether a franchise has been granted to any supplier of electric service within the corporate limits of or in the area served with electricity by the system. If so, for each such utility franchised to render service, state its name and the area it serves within the corporate limits of and the other area served with electricity by the system.

57. State the extent to which commercial or industrial entities within the corporate limits of the municipality or within (or adjacent to) the area rendered electric service by the system presently have, since 1960, been denied the opportunity by the system to

(i) change from electric service by the system to service by any other utility, or

(ii) change from electric service by another utility to service by the system.

(a) Describe each instance in which an entity was denied the opportunity to so change and the reasons for the system's denial; and describe any conditions set forth by the system for permitting such changes.

(b) State for each year 1960 through 1971:

(i) the number of customers by customer class (commercial or industrial) who changed during each year from electric service by another electricity supplier to service by the system:

(ii) the kilowatt-hour sales to such customers in each year in which service was supplied by the system.

(c) State for each year 1960 through 1971:

(i) the number of customers by customer class (commercial or industrial) who changed during the year from electric service by the system to service by another electricity supplier;

(ii) the kilowatt-hour consumption by such customers supplied by the system in the year such change occurred and in the five years immediately preceding such change.

58. State whether any other electric utility renders electric service to customers within the corporate limits of or in the area served with electricity by the system. If so, list the name of any other electricity supplier rendering such service and designate the area and types of customers served by the utility named.

59. State whether the municipality, or any agency or department thereof, ever declined to provide, or declined

to seek the opportunity to provide, electric service to any or all customers served by any other electricity supplier in the corporate limits of or in the area served with electricity by the system. If so:

(a) State the name and address of each such customer;

(b) Describe each such incident.

60. (a) State the name and address of each industrial and commercial customer served at any time during the period January 1, 1960 to date by any other electricity supplier within the corporate limits of or in the area served with electricity by the system which has ever declined to accept an offer of electric service by the system.

(b) Describe the circumstances of each such incident and provide the date(s) on which it occurred.

[61. to 63. deleted].

64. (a) State each source (e.g., self-generation, wholesale purchases) of electric energy utilized by the system in the years 1960 and 1971* (or the most recent year available).

(b) State for each of the aforementioned years:

(i) the kilowatt-hours obtained from each source;

(ii) the maximum kilowatt demand placed on each source;

(iii) the cost of the electricity obtained from each source.

(c) In each case where energy was not system-generated, specify any breakdown between capacity, demand, energy or other charge incurred and indicate the voltage at which each such supply was received.

65. State the names, dates of installation, types (e.g., hydro, diesel, steam), nameplate capacity, heat rates, kilowatt-hours generated, capacity factors, investment costs, depreciation rates, accumulated depreciation, operation and maintenance costs exclusive of fuel, types of fuel burned and fuel costs of each generating unit purchased, constructed, owned or operated by the system for each of the years 1960 through 1972.

66. State whether the municipality or any agency or department thereof, alone or jointly with any other utility or entity, presently plans to install additional generating or transmission capacity. If so, describe in detail:

- (a) any such plans;
- (b) the stage of their progression;
- (c) the name and address of each utility or entity involved in any such plan;
- (d) any present effort being made by or for the system on any of these matters, state the name and address

of the person or other entity engaged in such effort and the expected completion date of the project.

67. Except for information contained in the answers to Interrogatory 66, state the cost per kilowatt hour, including both estimated capacity and energy costs, for the system's most recent generation and transmission expansion programs and those forecasted as of 1960, 1965 and 1970, for the following ten-year period, or such other or shorter periods as may have been utilized by the system for planning purposes. The answer should include a statement of the estimated (and where applicable, the realized) cost of generation and transmission programs undertaken or proposed during the production period indicating:

(a) For generation and

(b) For transmission subdivided by voltage

classes, the estimated costs as follows:

(i) investment cost in dollars per kilowatt;

(ii) energy cost in mills per kilowatt hours;

(iii) investment carrying charges and energy cost in mills per kilowatt hour.

68. Describe any present effort being made by or for the system relating to any studies or other efforts

described in Document Requests 7(c) and 7(d), and state the name and address of the person or other entity engaged in such effort and its expected completion date.

69. State whether, during the period January 1, 1960 to date, the system or the municipality in which it serves, or any agency or department of that municipality, ever has sought, requested, considered, or inquired into the initiation of wholesale electric supply to it by any electric utility or any other entity or group of such entities. If so, describe in detail each such instance and furnish each document relating to each such instance.

70. Is the system or municipality or any municipal official a member of any electric, power, energy or similar association or organization? If so:

(a) List the name and address of each such association or organization and state the year in which the system first became a member of each;

(b) State the name and address of any system or municipal employee who is or has been an officer or director of each such association or organization during the period of January 1, 1960 to date; the title of the position held; the period of time during which such office or directorship was held; and the present position of the employee in the system or the municipality, or if not now employed by the system, the date on which such employment terminated.

[71. deleted].

72. State the name, address and present position of each person employed by the system during the period January 1, 1969 to date who had or now has managerial responsibility in each of the following areas, or has occupied the following positions together with the dates during which each person had such responsibility or held such position:

- (a) Marketing;
- (b) Sales;
- (c) Accounting;
- (d) Financial planning;
- (e) Chief executive officer, supervisor or manager;
- (f) Chief operating officer;
- (g) Research and development;
- (h) Engineering.

If any such person is no longer employed by the system, state the date on which such person left the system's employ.

73. Is the system now, or has it been at any time during the period January 1, 1960 to date, a member of any bulk power supply coordinating group? If so:

- (a) State the name by which the group is known;
 - (b) Name the other members of the group;
- and

(c) Indicate the particular coordinating functions of each group.

74. State the number of present employees of the system who hold an engineering degree of the bachelors level or above; and state the specific degree or degrees held by such employees and the number of years each recipient of each degree has been employed by the system.

75. State whether the system now performs, or provided at any time during the period January 1, 1960 to date, its own engineering services (e.g., assistance in the design of in-plant generation, transmission or distribution facilities, substations, protective devices, transformers, heating and light systems). If so:

(a) Describe which of these services the system performs itself.

(b) State the amount of direct charges made by the system to any customer for the rendering of such service for each year 1961, 1966 and 1971.*

(c) For each year 1961, 1966 and 1971* state the system's expenditures relating to providing customers with such services.

76. State whether any engineering services are provided to the system or its customers by Applicant (or by any other supplier of electric power). If so, describe

each instance in which such services were performed and the cost to the system in 1961, 1966 and 1971* of any such services received.

[77. and 78. deleted].

79. State for each year 1960 to date whether the design and engineering of the system's generation, transmission or distribution facilities has been performed by Daverman Associates or any other entity or person not employed by the system. If so, state the name and address of such entity, the dates during which he or it performed such services, the nature of services performed, and the cost to the system of such services.

80. (a) For each year 1960 through 1972 and as projected for each of the next ten years, 1973 through 1982, state the installed reserve and operating reserve criteria on the following bases:

(i) megawatts-electrical;
(ii) percentage of the system's largest generating unit.

(b) State the method used to determine such reserve criteria (e.g., probability analysis, judgment, etc.).

81. State the system's annual load factor data for each year 1960 through 1972 and as projected for each of the next ten years, 1973 through 1982.

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 COMPEL NON-PARTIES TO RESPOND TO DEPOSITIONS UPON WRITTEN INTERROGATORIES, dated February 22, 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 22nd day of February, 1973:

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