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CABLE ADDRESS
"MILAM"

May 20, 1971

Arthur W. Murphy, Esq., Chairman
Atomic Safety and Licensing Board
Columbia University School of Law
Box 38, 435 West 116th Street
New York, New York 10027

Re: AEC Docket Nos. 50-329
50-330

Dear Chairman Murphy:

We enclose herewith a Motion by the Intervenors whom I represent in connection with the taking of depositions and for an order requiring that the hearing not proceed until the AEC and ACRS have responded to discovery.

We have attached a supporting affidavit and you will note that in connection with the discovery problem it is the only factual affidavit before the Board.

In the event that there are any further pre-hearing conferences in this proceeding, we should appreciate consideration being given to holding them in Chicago. Chicago is more convenient than New York for a great number of persons participating in this proceeding and the expense of trips to New York is at times prohibitive to my clients.

With respect to Mr. Roisman's letter of May 17, 1971, with which he encloses an offer of proof on behalf of EDF, the Intervenors whom I represent wish to adopt that offer of proof. In addition, we would also be prepared to demonstrate that evidence secured through the Palisades hearings tends to indicate that Consumers Power Company's electrical forecasting is not supported by the evidence. In the Palisades hearings, Mr. Jack Mosely, who is in charge of such electrical forecasting for Consumers, attempted to testify about power needs regarding Consumers

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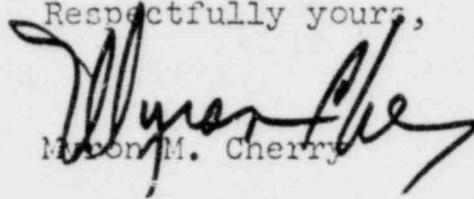
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hearing

Arthur W. Murphy, Esq.,
May 20, 1971
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Power Company's electrical forecast. On each occasion
Mr. Mosely's testimony was stricken from the record as not
supported by evidence.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "Myron M. Cherry".

Myron M. Cherry

MMC:ck

cc: Dr. David B. Hall
Dr. Clark Goodman
Mr. Stanley T. Robinson, Jr.
All Counsel of Record