

LAW OFFICES

SPIEGEL & McDLARMID

2600 VIRGINIA AVENUE, N.W.
WASHINGTON, D.C. 20037
TELEPHONE (202) 333-4500
TELECOPIER (202) 333-2974

GEORGE SPIEGEL, P.C.
ROBERT C. MCDIARMID
SANDRA J. STREBEL
ROBERT A. JABLON
JAMES N. HORWOOD
ALAN J. ROTH
FRANCES E. FRANCIS
DANIEL I. DAVIDSON
THOMAS N. MCHUGH, JR.
DANIEL J. GUTTMAN
PETER K. MATT
DAVID R. STRAUS

BONNIE S. BLAIR
ROBERT HARLEY BEAR
THOMAS C. TRAUGER
JOHN MICHAEL ADRAGNA
CYNTHIA S. BOGORAD
GARY J. NEWELL
MARC R. POIRIER
MARTA A. MANILDI
JOSEPH L. VAN EATON

July 28, 1980

Merlyn D. Sampels, Esq.
Worsham, Forsythe & Sampels
2001 Bryan Tower
Suite 2500
Dallas, Texas 75201

Michael I. Miller, Esq.
David A. Rosso, Esq.
Isham, Lincoln & Beale
One First National Plaza
Suite 2400
Chicago, Illinois

Charles G. Thrash, Jr., Esq.
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

Fredric Chanania, Esq.
Nuclear Regulatory Commission
Washington, D. C. 20555

Robert Fabricant, Esq.
Department of Justice
P. O. Box 14141
Washington, D. C. 20044

John A. Cameron, Jr., Esq.
Federal Energy Regulatory Commission
825 North Capitol Street
Washington, D. C. 20426



Re: Houston Lighting & Power Company, et al
(South Texas Project, Units 1 and 2)
NRC Docket Nos. 50-498A, 50-499A
Texas Utilities Generating Company, et al
(Comanche Peak Steam Electric Station, Units 1 and 2)
NRC Docket Nos. 50-445A, 50-446A
Central Power & Light Company, et al
FERC Docket No. EL 79-8
Drafts of Settlement Transmission Provisions

Gentlemen:

The Public Utilities Board of the City of Brownsville, Texas would like to clarify its position on the various drafts of possible transmission provisions to be included in a possible overall settlement agreement (or separate settlement agreement) for resolving the above-referenced outstanding FERC and NRC proceedings, as proposed by the three Companies.

Brownsville is unwilling to accept any total settlement and therefore any individual case settlement unless there are specific rates, terms and conditions concerning transmission wheeling services for all types of bulk power wheeling:

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(a) to, from and over the DC interconnections (if DC can be justified as part of the settlement); and

(b) throughout the ERCOT area;

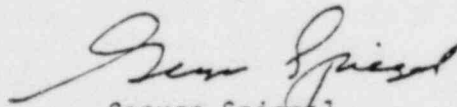
upon a mutually agreed basis. Such rates would then be made effective at the time of settlement, subject to subsequent change as follows:

(i) by unilateral filing, subject to refund, where only increased costs, accruing after the effective date, are being flowed through into the rates; or

(ii) after hearings or opportunity for hearings and regulatory approval of a filing, where the Applicant seeks to change the rate design or structure or underlying cost allocation methods.

While there are other important aspects of the proposed settlement which still raise serious unresolved questions, we see no point in addressing these unless agreement can be reached on the transmission arrangements and rates. We will be happy to engage in serious discussions regarding transmission with any party to the proceeding, but we urge an all-party meeting to seek agreement on transmission. After that, other aspects of the proposed settlements can be addressed.

Sincerely,



George Spiegel
Attorney for the Public Utilities
Board of the City of Brownsville, Texas

GS/nzb

cc: All parties
Mr. Robert E. Roundtree
John W. Davidson, Esq.