

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
HOUSTON LIGHTING & POWER COMPANY)	
PUBLIC SERVICE BOARD OF SAN ANTONIO)	NRC Docket Nos. 50-498A
CITY OF AUSTIN)	50-499A
CENTRAL POWER AND LIGHT COMPANY)	
(South Texas Project, Unit Nos.)	
1 and 2))	
)	
TEXAS UTILITIES GENERATING)	
COMPANY, <u>et al.</u>)	
(Comanche Peak Steam Electric)	NRC Docket Nos. 50-445A
Station, Units 1 and 2))	50-446A

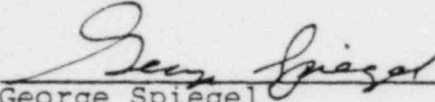
FIRST SUPPLEMENT TO BROWNSVILLE'S TRIAL BRIEF

1. This supplements the Initial Trial Brief of the Public Utilities Board of Brownsville, Texas, dated October 8, 1980, by substituting corrected copies of Appendices I, II, III, IV, V and VI which are lists of documents which Brownsville anticipates may be offered into evidence. In addition, these documents have been paginated and the pagination numbers are shown on the enclosed lists.

2. We have reproduced the documents in Volumes I, II, III, IV and VI and are distributing herewith copies to the following Washington attorneys: J. A. Bouknight (HLP); David M. Stahl (CSW); Joseph Knotts (TUGCO); Robert Fabrikant (Justice) and Fredric D. Chanania (NRC). If counsel for other parties really need and desire a full set (over 12 inches) please call or write, and we will mail (or express) same to you.

3. We are also reproducing sets of Volume V "Confidential Documents" and holding them in our office. These are documents as to which Gulf States Utilities Company (Stipulation to Protective Order filed July 24, 1979) or Central and South West Corporation (Protective Order, November 7, 1979) have asserted confidentiality. We are requesting their consent to make distribution of these. In the unlikely event that either declines, we will take such further steps as appear meet.

Respectfully submitted,


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

October 16, 1980

Law Offices of:

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Houston Lighting & Power Co.
(South Texas Project, Units No. 1 & No. 2)
NRC Docket Nos 50-498A and 50-499A
Potential Exhibits of Brownsville

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6/8/64	Letter	Lovelady	N.A Easter	1	CP A 10907	5
9/1/64	Ltr	Ewing	N.A Easter	1	CP A 10904	6
7/24/78	Memo	Smith	Wells	1	CP A 12006	7
7/20/78	Ltr	Brown	Smith	7	CP A 12007-13	8-14
1/19/65	Ltr	Ewing	Collins	1	CP A 04196	15
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5/13/65	Ltr	Siegelin	Mabe Blackburn	1	CP A 10746	19
8/8/68	Newsclip	"PUB Cow Ogles CP&L and Mexico"		1	CP A 03282	20
11/7/68	Draft of Minutes	CP&L Home Office Mtg Mabe		2	CP A 03968-69	21-22
3/13/69	Memo	Davis	Joslin	1	CP A 03960	23
4/14/69	Memo	Borchelt	Siegelin	2	CP A 10620-21	24-25
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11/4/69	Minutes	Gary	Admin. Committee	2		30-31

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5/27/70	Ltr	Davis	Martinez	1	CP A 10564	37
No date	Draft of Minutes	Seigelin re CP&L; CFE	7/19, 21/71	4	CP A 10860-63	38-41
2/18/71	Ltr	Borchelt	Sieglin	2	CP A 10894-5	42-43
8/16/72	Memo	Borchelt	Seigelin	3	CP A 31801-03	44-46
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9/11/78	Memo	Borchelt	Hardy	1	CP A 10239	55
10/24/78	Memo	Orsak	Borchelt	1	CP A 10767	56
12/14/78	Ltr	Orsak	Sada-Gamiz	1	CP A 10258	57
7/27/79	Ltr	Orsak	Paez	4	CP A 0118709-12	58-61
No date	Memo	Descriptions on 1978 Load	& Comments	3	CPA 12187-89	62-64
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11/77 (?)	Notes	"Quick Ex Nov 2..."		3	A 81512-4	76-78
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7/26/77	Ltr	Gross	Hardy	4	CP A 03741-43	87-90
6/17/66	Draft	Thomas	Moursund	8	HP 326253-60	91-98
8/64	Draft	Loslin	Trommershausen	2	HP 002945-46	99-100
4/6/64	Notes	"Myers said he..."		1	CP A 07260	101
7/3/53	Memo	Wines	Bates	1	CP A 10208	102
10/28/76	Memo	Jinnette	Hardy	2	CP A 08778-79	103-104
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3/19/61	Report	"CPC Int'l..Parallel op. with CP&L"		1	CP HL 01907	175
No date	Report	Requirements for parallel Operation of CP&L and Customer Generators"		6	CP A 94809-10 CP A 94768 CP A 94764 CP A 94790 CP A 94784	176-181
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3/8/78	Minutes	"PUB Mtg- Brownsville Offices"		1	CP A 55204	222
3/17/78	Memo	Illingworth	Lizka	5	CP A 05508-12	223-227
8/15/78	Memo	Illingworth	Edelstein	4	CP A 05442-45	228-231
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2/19/79	Memo	Smith	Woolsey	7	HP 0053410-16	235-241
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8/28/79	Ltr	Loveless	Smith	1	CP HP 0053404	247
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10/9/70	Memo	Kindel	Files	2	CP A 56798-99	260-61
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7/3/68	Letter	Joslin	Mayor of Brownsville	2	CP A01930-31	271-272
6/17/68	Adv	"CP&L's Proposal to Lease the Brownsville Electric System"		4	CP A04029	273-276
6/15/68	News Clip	"Rejection of CPL offer Urged..."		1	CP A04030	277
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6/12/68	Memo	"What you can do to help"		3	CP A02541-43	279-281
No date	Memo	Johnson	Joslin	2	326433-34	282-283
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7/14/67	Memo	Davis	Joslin	5	A 08463-67	305-309
12/6/66	Rpt	Johnson	Phillips	3	HP 326441-43	310-312
1/31/66	Ltr	RBP	Joslin	4	HP 326171-74	313-316
10/7/65	Memo	Davis	Brownsville	2	CP A 01882-83	317-318
3/8/66	Memo	Wine	Joslin	1	A 01411	319
6/10/65	Minutes	Harlingen Country Club		2	CP A04147-48	320-321
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3/9/65	Form			1	A 01333	324
12/13/63	Note	Osborne	Joslin	5	CP A02796-800	325-329
11/23/60	Ltr	George	Bates	1	CP A01663	330
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5/7/59	Memo	Cunningham	Brownsville	3	CP A04367-69	333-335
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4/12/56	Ltr	Bates	Richardson	1	CP A	343
1/23/57	Ltr	Bates	Longman	1	HP 324347	344
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Houston Lighting & Power Co.
(South Texas Project Units No. 1 and No.2)
NRC Docket Nos. 50-498A and 50-499A
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12/14/72	Memo	R.S. Jinnette	R.E. Horine	1	CP A81989	384
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5/31/74	Memo	R.S. Jinette	A. Astry	1	CP A07312	423
7/26/77	Ltr	L.E. Gross	H.E. Joslin	1		424
11/12/64	Memo	B. Davis	Meeting/PUB Rep.	2	CP A01403-04	425-426
3/26/65	Ltr	S. Brooks	L. M. Harvey	2	CP A03021-22	427-428
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10/25/67	Memo	B.M. Davis	"Industrial Development"	1	CP A08333	444
11/27/67	Memo	B.M. Davis	Brownsville	1	CP A68354	445
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11/10/67	Memo	T.A. Vernor	A. Autry	3	CP A01264-66	463-465
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11/22/67	Ltr	T. A. Vernor	C.T. Hodgson	2	CP A01257-58	468-469
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No date	Memo	J. Fisher	F. Birkhead	1	CP A17893	471
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6/18/65	Minutes (incomplete)			2	CP A04183-84	473-474
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9/15/67	Memo	E.S. Joslin	Si Phillips	3	CP A03446 CP A 02444-45	476-478
3/16/68	Memo	B.M. Davis	E.S. Joslin	1	CP A01217	479
3/12/68	Rpt	F.J. Spencer	Meeting/AMAX	8	CP A01218-25	480-487
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3/10/75	Memo	J. Durham	B.C. Kindel	1	HP 0003445 CP A30566	491
7/22/66	Memo	H.E. Nissel	E.S. Joslin	2	CP A03007-08	492-493
8/3/66	Memo	B. Davis	Brownsville Alumin. Plant	1	CP A03006	494

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1/29/75	Ltr	B. Mountain	Texas Ind. Com.	1	CP A31741 HP 0005183	496
No date	Rpt	Area Development		2	CP A02448-49	497-498
1/3/74	Press Release	More Jobs for South Texans		2	CP A30751, 53 HP 0004286, 87	499-500
3/4/74	Ltr	J. Durham	S. Wickersham	1	CP A30811 HP 0004342	501
3/22/74	Ltr	J. Durham	J. M. Welch	3	CP A30807-09 HP 0004339-41	502-504
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9/16/74	Memo	J. Durham	B.C. Kindel	2	CP A30775-76 HP 0004308- 0004309	508-509
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1976	Ltr	J. Crutchfield	W.S. Wilson	1	CP A30653-4 HP 0003638-7	515
10/14/74	Ltr	J. Crutchfield	W.S. Wilson	3	CP A30391-93 HP 0004174-76	516-518
2/12/79	Memo	J. Zapata	B. Price	1	CP A12228 HP 0008979	519
9/13/68	Memo	N.D. Head	H.E. Mortimer	1	GS	520

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6/23/76	Ltr	J. Mardis	P. Ricketts	1	GS	526
5/20/68	Ltr	J.N. Myers	J.W. Walton	1	CP A07243	527
11/6/75	Ltr	R.S. Jinnette	PUCT	2	GS	528-529
11/14/75	Ltr	G. Morris	R.S. Jinnette	1	GSU 1542	530
11/16/78	Ltr	R.S. Jinnette	L. Gandy	2	CP A06462-63	531-532
12/11/78	Ltr	W.C. Price	E. Lantz	1	CP	533
2/3/79	Ltr	W.C. Price	R. Roundtree	2		534-535
7/3/56	Ltr	J.L. Bates	S.L. Glass	3	CP A	536-538
7/13/56	Ltr	J.L. Bates	H.E. Butt	1	CP A54381	539
6/22/62	Memo	M. Goldsmith	R.A. Ewing	8	CP A02874-75, 77-82	540-547
7/20/64	Memo	R.A. Ewing	E.S. Joslin	2	CP A02771-72	548-549
5/3/66	Memo	K.R. Stone	R.A. Ewing	1	CP A01468	550
5/4/66	News Clip	El Jardin	Incorp. Hearing	1	CP A01410	551
No D	Map	"El Jardin Proposed Incorp... "		1	CP	552
3/7/69	Ltr	D. T. Duncan	B. Davis	1	CP A03948	553
3/6/69	Newsltr	Rotary Bulletin		1	CP	554
2/20/68	Ltr	R.A. Ewing	R.E. Horine	1	CP A03484	555

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1/30/76	News Clip	"Complaint Lodged, Firm Violates Terr."		1	ASW 000129	557
5/31/77	Memo	T. Deweese	J.O. Hayter	1	ASW 000221	558
10/25/77	Memo	J.O. Hayter	"Lindsay Prop."	7	ASW 000173-79	559-565
7/10/78	Memo	T. Deweese	F.L. Johnson	1	ASW 000316	566
1/31/79	Memo	T. Deweese	F.L. Johnson	1	ASW 0000297	567
5/3/74	Note	F.L. Johnson		1	ASW 0000301	568
11/8/77	Ltr	T. Deweese	H.H. Short	1	ASW 0000298	569
7/15/76	Ltr		R. Knight	3	ASW 0000161-63	570-572
10/17/78	Memo	C. B. Smith	E.J. Best	1	ASW 0000482	573
10/30/78	Memo	H.W. Lancaster	E.J. Best	2"	ASW 0000483-84	574-575
3/22/79	Ltr	E.J. Best	K. Heald	2	ASW 0000480-81	576-577
4/2/79	Ltr	E.J. Best	J.Lamar Stall	2	ASW 0000478-79	578-579
4/17/79	Ltr	J.L. Johns	J.Lamar Stall	5	ASW 0000473-77	580-584
4/19/79	Ltr	J.C. Gardner	J. L. Johns	2	ASW 0000468-69	585-586
12/3/64	Memo	J.R. Welsh	H.L.McAdams	4	ASW 0000302-05	587-590
4/20/79	Memo	E.J. Best	Local Mgrs.	1	ASW 0000467	591
4/20/79	Memo	J.D. Gardner	E.J. Best	3	ASW 0000470-72	592-594
No D	Memo	T. Deweese	F.L. Johnson	1	ASW 0000280	595

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10/77	Docket	Docket #627, PUCT		5	ASW 0000193-97	599-603
2/11/73	Minutes	Meeting w/Union Carbide		1	CP B0006696	604
3/17/73	Memo	M.L.Borchelt	W.G. Siegelin	3	HP 004527-29	605-607
9/12/73	Memo	Wm.T. Hurn	W.A. Cockburn	1	HP 004520	608
3/31/73	Ltr	W. T. Hurn	J. H. Chandler	1	HP 004516	609
1/30/73	Memo	R. Earley	B.C. Kindel	4	CP B0003024-27	610-613
3/9/77	Memo	C.R.Gairing	D.H. Ford	7	CP A69880-86	614-620

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2/19/73	South Tx. Project Brochure	San Antonio, CP&L, HPL		8	CP A 32006	622-629
7/3/73	Memo	Thrash	Siegelin	2	CP A 31870-71	630-631
7/1/73	South Tx. Project Brochure	San Antonio		8	CP A 32118	632-639
9/17/73	Letter	Hastings	Horine	1		640
9/23/74	Ltr	Siegelin	Hastings	2	CP A 32023-32024	641-642
9/14/74	Ltr	Siegelin	Shepperd	2	CP A 32026-32025	643-644
9/23/74	Ltr	Siegelin	Alejandro	1	CP A 32027	645
9/24/74	Minutes	Thrash	(STP Meeting)	5	CP 00839-00843	646-650
11/8/74	Minutes	Thrash	(STP Meeting)	4	CP 00932-00934	651-654
8/30/73	Ltr	Shepperd	Jinnette	1	CP A 32012	655
9/12/73	Ltr	Wauters	Boulden	1	CP A 32014	656
10/24/73	Memo	Borchelt	Horine	3	CP A 08856-08858	657-659
9/6/73	Ltr	Hancock	Siegelin	2	CP A 32015-32016	660-661
10/12/73	Memo	STP Technical Task Force	Siegelin	6	HP 5160000634-39	662-667
No date	Diagram			1	CP A 31949	668
10/24/73	Memo	STP Technical Task Force	Siegelin	7	CP A 31944-31950	669-675
1/11/74	Minutes	STP Mgmt Committee		8	CP 629-636	676-683

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2/8/74	Minutes	STP Mgmt Committee		5	CP 651-655	687-691
1/21/74	Ltr	Siegelin	Herring	1	CP 666	692
1/21/74	Ltr	Siegelin	Herring	1	CP	693
7/14/71	Memo	Borchelt	Siegelin	2	HP 003693-94	694-695
10/25/73	Report			3	HP 25160J00886-88	696-698
2/12/74	Memo	Simmons	Oprea	2		699-700
4/30/74	Report	Tanner		6	HP 25180000681-85	701-706
9/19/77	Memo	Rummel	Members (TIS Planning Comm.)	1	CP 0021561	708
2/23/67	Ltr	Austin	Hulsey	1	TS 22004	709
12/17/70	Memo	Gary	Turner	2	DP 24422-23	710-711
1/29/72	Memo	Mast	Siegelin	1	003883	712
No date	STP Participation Agreement §18.2			2		713-714
6/16/75	Note	Chalker	Bill	1	HP 11695	715
11/24/74	Agreement	WTU-Gate City		12	HP 11696-707	716-727
10/15/75	Ltr	Elrod	Yarbrough	2	HP	728-729
11/4/76	Minutes			2	HP	730-731
11/6/68	Memo	Scarth	Hutchison Rogers Robuck	1	TP 25722	732
10/30/68	Ltr	Schneider	Robinson	3	25070001681-83	733-735
11/11/68	Draft of Mtg Minutes	JM Mabe	CP&L	2	CP A 02939-40	736-737
11/14/68	Memo	Scarth	Hulsey	2	HP 12162-63.	738-739

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11/14/68	Ltr	Samners	Schneider	1	25060000174	743
11/14/68	Ltr	Samners	Schneider	1	CP A 02932	744
12/11/68	Ltr	Austin	Dale	1	TS 22027	745
12/17/68	Ltr	Davis	Schneider	2		746-747
3/13/70	Memo		Siegelin	1	CP 56429 (?)	748
11/3/70	Ltr	Morgan	Davis	3		749-751
11/11/70	Ltr	Gideon	Morgan	1		752
11/13/70	Ltr	Samners	Morgan	1		753
11/16/70	Ltr	Kinney	Morgan	1		754
11/18/70	Ltr	Morgan	Wilson	2		755-756
1/23/74	Ltr	Robinson	Segrest	3	13199-201	757-759
1/25/74	Minutes	TIS Admin. Comm.		1	TP 25717	760
4/4/74	Minutes	TIS Planning Sub Comm.		7	HP 23180000667-673	761-767
4/30/74	Minutes	TIS Planning Sub Comm.		2	HP 25180001063-064	768-769
4/7/76	Ltr	Hastings	Hancock	1		770
4/7/76	Ltr	Shepperd	Siegelin	1	CP 08790	771
4/9/76	Ltr	Gross, Shepperd	Hancock	1	CP 08789	772
4/9/76	Ltr	Gross, Shepperd	Hancock	1	11741	773
6/28/77	Ltr (w/att: TIS Admin. Comm. Mtg. Minutes)	Simmons	Members (TIS Admin. Comm)	5	11803-07	774-778

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8/31/77	Agreement	CP&L, HP&L...		2	CP A 67942-43	780-781
2/3/78	Minutes	TIS Admin. Comm. Meeting		1	CP 0067388 (?)	782
7/27/79	Memo (w/Enc: STIS Operating Agreement)	Smith	Chalker	20	CP A 0118724-43	783-802
No date	Memo	Collins	Re: STIS Mtg 5/21/69	3	HP 000763-65	803-805
6/4/69	Note			3	TS 20020-22	806-808
5/18/70	Ltr	Gideon	Davis...	2	DP 24473-74	809-810
6/3/70	Ltr	Gideon	Davis	3	DP 24470- 72	811-813
10/5/70	Ltr	Gideon	Members/TIS	2	HP 003553-54	814-815
10/5/70	Ltr	Gideon	Members/TIS	2	DP 24463-64	816-817
9/15/72	Ltr	Has	Tynan	1	DP 24354	818
9/19/72	Ltr	Tynan	Turner	1	DP 24355	819
5/16/75	Ltr	Tynan	Jolly	2	HP 12579-80	820-821
5/27/75	Memo	Jordan	Standish	1		822
5/28/75	Ltr	Jordan	Hardy	2		823-824
5/20/76	Ltr	Hardy	Reese	2	DP23199-200	825-826
8/19/76	Ltr	Jordan	Hardy	1	HP	827
2/7/78	Ltr	Smith	Tanner	1	CP 64737	828
2/22/78	Ltr	Meador	Tanner	2	CP A 64798-99	829-930
4/20/78	Ltr	Smith	Bruggenan	2	CP A 64795-96	831-832
6/1/62	Memo	Hulsey		2	TS 21962-63	833-834
1/26/71	Ltr	King	Taylor	2	HP10010001048	835

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1/22/71	Ltr	Taylor	King	1	HP10010001049	836
6/10/64	Memo	Hulsey	Fisher	1	HP 11518	837
6/17/75	Note	Santu		1	HP 011972	838
10/24/75	Ltr	Yarbrough	Elrod	2	HP 25026-27	839-940
5/20/76	Ltr	Chalker	Morris	3	DP 23142-44	841-843
6/23/76	Memo	Benton	Jones	1	006292	844
9/13/76	Ltr	Watt	Naylor	3	GS	845-847
5/11/77	Memo	Naylor	Johnson	9	GS	848-856
3/14/78	Ltr	Wells	Naylor	1	GS	857
No date	Statutes			5		858-862
2/13/63	Ltr	Dept. Interior	Mr. President	2	HP 325797-98	863-864
10/20/54	Ltr	Hume	Lovelady	1	CP A 10189	865
No date	Ltr	Dept. Interior	Bates	1	CP A 10033	866
1/65	Statement	"Relations with REA Coops"		10	HP 002984-93	867-876
7/9/68	Ltr	Chase	Schneider	2	DA	877-878
8/23/68	Ltr	Schneider	Wdall	1	DA	879
9/3/68	Ltr	Bennett	Schneider	1	DA	880
9/3/68	Ltr	Bennett	Schneider	1	DA	881
9/20/68	Memo	Davis		5	CP A 3326-3330	882-886
10/8/68	Memo	Jenkins	Files	2	DA	887-888
10/11/68	Ltr	Myers	Jenkins	1	DA	889
10/25/68	Ltr	Schneider	Rodriguez	2	DA	890-891
10/25/68	Minutes	Borchelt		2	CP A 10649-50	892-893

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11/13/68	Ltr	Hill	Friedkin	1	DA	897
11/29/68	Memo	Davis	Joslin	3	CP A03268-3270	898-900
12/3/68	Ltr	Schneider	Hill	2	DA	901-902
1/3/69	Report	APPA Newsletter p. 5		1		903
2/21/69	Ltr	Schneider	Jenkins	1	DA	904
2/28/69	Ltr	Thompson	Schneider	1	DA	905
2/28/69	Memo	Davis	Siegelin	1	CP A 10626	906
3/3/69	Ltr	Davis	Rodriguez	2	CP A 10627-28	907-908
3/13/69	Memo	Davis	Joslin	1	CP A 03960	909
4/14/69	Memo	Borchelt	Siegelin	2	CP 10620-21	910-911
6/5/69	Ltr	Davis	Rodriguez	3	CP 10614-16	912-914
8/27/69	Ltr	Hill	Schneider	1	DA	915
8/27/69	Ltr	Hill	Schneider	1	DA	916
12/31/68	Summary	Amistad Dam Investment		2	DA	917-918
11/5/69	Memo	Borchelt	Siegelin	3	CP A 10597-99	919-921
3/5/75	Memo	Borchelt	Siegelin	2	CP A 08841-42	922-923
7/24/75	Memo	Borchelt	Siegelin	2	HP 005477-78	924-925
7/24/75	Memo	Borchelt	Siegelin	2	CP A 8834-35	926-927
7/24/75	Ltr	Siegelin	Sheppard	1	CP A 08833	928
8/26/75	Ltr p. 2	Gross	Hardy	1	CP A 08825	929
1/27/76	Ltr	Gross, Sheppard	Hardy	2	CP A 08801-02	930-931

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2/24/76	Ltr	Hastings	Sheppard	1	DA	934
3/6/76	Note			1	A 81503	935
11/1/76	Memo	Jinnette	Hardy	1	CP A 08776	936
2/11/77	Note			2	CP A 09107-9108	937-938
6/6/77	Ltr			4	CP A8845-48	939-942
7/26/77	Ltr	Rooson	Hardy	4	A 81130-33	943-946
8/2/77	Ltr	Chappelear	Hastings	1	DA	947
4/4/78	Memo	Jinnette	Hardy	8	CP 8891-98	948-955
7/24/78	Agreement	CP&L-STEC/MEC		10	CP A 81716	956-65
2/5/73	Proposal		Campbell....	18	CP A 55916-933	966-983
No date	Plan B			1	CP A 55925	984
No date	Plan A			1	CP A 55924	985
10/21/73	Memo	Orsak	Taylor	2	CP A 57462-63	986-987
2/5/74	Study			4	CP A 56085-88	988-991
1/11/74	Study			5	CP A58089-93	992-996
5/6/74	Ltr	Autry	Gandy	1	CP A 80978	997
6/6/73	Memo	Borchelt	Horine	2	CP A 57242-43	998-999
3/22/74	Proposal			3	CP A 57439-441	1000-1002
6/4/74	Memo	Nichols	Orsak	1	CP A 59012	1003
9/29/76	Memo	CP&L	Price	1	CP A 55608	1004
7/22/77	Memo	Orsak	Corcoran	1	CP B 1107546	1005
3/3/77	Ltr	Greenwood	Hughes	1		1006
1/13/72	Memo	Borchelt	Horine	2	CP A 01721-22	1007-1008

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7/6/66	Proposal	Barnard		8	A 03013-3020	1010-1017
8/5/66	Ltr	Barnard	Joslin	2	CP A 03002-03	1018-1019
9/2/66	Ltr	Joslin	Barnard	1	CP A03005	1020

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6/17/59	Ltr.	W.C. Price	B.C. Wright	2	CP A52770-71	1027-28
8/31/59	Memo	W.C. Price	P.O. Gilbert	1	CP A77482	1029
2/20/60	Ltr.	R.G. Garza	J.L. Bates	1	CP A53963	1030
2/19/60	Ltr.	F.W. Hofmokol	R.G. Garza	2	CP A53964-65	1031-32
5/6/60	Ltr.	J.L. Bates	J.C. George	2	HP 325276-77	1033-34
5/10/60	Ltr.	J.C. George	J.L. Bates	1	CP A54022	1035
5/18/60	Ltr.	J.L. Bates	J.C. George	2	CP A54020-21	1036-37
5/25/60	Ltr.	C. Crowe	F.W. Hofmokol	2	HP 325293-94	1038-39
11/21/80	Ltr.	R.G. Garza	J.L. Bates	1	CP A53830	1040
2/6/61	Memo	Bill	Joslin	1	CP A04274	1041
5/29/61	Memo	W.C. Price	R.A. Ewing	2 "	CP A04272-73	1042-43
2/12/62	Chart	APJ/Borchelt	Bene. 100MW	1	CP	1044
9/10/62	Ltr.	W.C. Price	C.C. Wine	1	HP 0001943	1045
9/17/62	Memo	W.C. Price	C.C. Wine	2	CP A20158	1046-47
5/9/63	Ltr. & enc.	J.S. Osborne	E.S. Joslin	4	CP 02836-39	1048-51

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7/1/63	Memo	W.C. Price	C.C. Wine	3	CP A02113-14	1054-56
7/17/63	Memo	W.C. Price	C.C. Wine	2	CP A02824-25	1057-58
8/8/63	Ltr	W.C. Price	D.M. Given	1	CP	1059
8/14/63	Memo	W.C. Price	E.S. Joslin	3	HP 0002054- 55, 57 CP A02108-10	1060-62
10/8/64	Minutes - PUB/CPL			5	CP A08030-34	1063-67
11/12/64	Minutes	B.M. Davis	PUB/CPL	2	CP A01403-4	1068-69
3/26/65	Ltr	S. Brooks	L.M. Harvey	2	CP A03021-22	1070-71
6/24/65	Memo	B.M. Davis	CPL/BND	2	CP A04153-54	1072-73
7/2/65	Ltr	W.C. Price	Y. Garza	1	CP A04172	1074
1/3/66	Ltr	W.P. Barnard	E.S. Joslin	1	CP A02736	1075
1/12/66	Ltr	W.C. Price	W.P. Barnard	1	CP A02735	1076
7/6/66	Proposal	PUB Construct on 375 Mw Plant for Harvey Aluminum		8:	CP A03013-20	1077-84
8/5/66	Ltr	W.P. Barnard	E.S. Joslin	2	CP A03002-3	1085-86
9/2/66	Ltr	W.C. Price	W.P. Barnard	1	CP A03005	1087
9/15/67	Memo	B.M. Davis		2	CP A08361-62	1088-89
10/25/67	Memo	B.M. Davis		1	CP A08363	1090

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6/26/69	Memo	W.C. Price	C.C. Wine	1	CP A19870	1092
7/9/69	Memo	T.J. Curlee	W.C. Price	3	CP A56446-7	1093-1095
8/4/69	Memo	D. Clark	T. Curlee	1	CP A56448	1096
3/6/69	Memo	M.L. Borchelt	C.A. Mast	3	CP A56426-28	1097-99
3/13/70	Memo	T. Curlee	W.C. Price	1	CP A198670 HP 0001900	1100
No date	Notes entitled "Union Carbide Corporation"			2	CP B0006908-9	1101-02
7/31/70	Memo		B. Davis	1	CP A5	1103
1/25/72	Memo	R.E. Horine		2	CPA56580-81	1104-05
6/27/73	Memo	M.L. Borchelt	R.E. Horine	2	CP A57236-7	1106-07
2/13/74	Ltr	H.E. Hastings	R.E. Horine	3	CP A57428-30	1108-10
3/8/74	Memo	W.P. Smith	R.E. Horine	1	CP A57427	1111
4/24/74	Minutes	CPL/Union Carbide		3	CP 0067253-55	1112-14
4/26/74	Ltr.	R.W. Greenwood	T.V. Shockley	4	CP B0087256-59	1115-18
6/4/74	Memo	H.G. Nichols	C.E. Orsak	2	CP A56017-13	1119-20
7/12/74	Memo	Al Cisneros	Y. Garza	3		1121-23
7/22/	Memo	M.L. Borchelt	W.G. Siegelin	2	CP A57363-64	1124-25
7/22/74	Memo	B.C. Kindel	A. Autry	2	CP A57539-40	1126-27
1/23/75	Memo	M.L. Borchelt	R.W. Hardy	3	CP A57357-59	1128-30

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1/27/75	Ltr	Al Cisneros	R. Hardy	1	CP A04832	1131
2/24/75	Ltr	R.W. Hardy	Al Cisneros	1	CP A04831	1132
5/2/75	Memo	R.C. Nongard	E.G. Lantz	2		1133-34
8/13/75	Minutes	CPL/Union Carbide		1	CP B0007113	1135
9/30/75	Memo	J.G. Sandoval	T. Shockley	2		1136-37
10/17/75	Ltr	T.V. Shockley	D. Madden	2	CP B0007104-5	1138-39
		(w/enc. 10/7/75 Memo, Orsak to Shockley)				
12/2/75	Minutes	J.A. Ferner	CPL/Carbide	17		1140-55
12/9/75	Minutes		CPL/Carbide	1	CP A56128	1156
1/7/76	Minutes	PUB/Union Carbide		6	CP A4863-68	1157-62
1/7/76	Memo	PUB/Union Carbide		1	CP B0002677	1163
1/7/76	Newspaper			2	CP A05990-1	1164-65
2/2/76	Memo	W.C. Price	A. Autry	1	CP 05972	1166
2/10/76	Ltr	M.D. Stenson	H.F. Hastings	2		1167-68
2/12/76	Minutes	Lizka PUB Special Meeting		2	DA	1169-70
	Memo	Alternatives to transmission		6	CP B0002650-55	1171-76
2/13/76	Memo	R.D. Forbus	W.C. Price	1	CP A05992	1177
	Map	"Plan X"		1	CP	1178
2/17/76	Ltr	H.E. Hastings	A. Autry	1		1179

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2/13/76	Minutes		CPL & UCC	2	CP A55757-8	1180-81
2/19/76	Minutes		CPL & BND	1	CP A55759	1182
3/1/76	Minutes	H.E. Hastings	LCRA & PUB	1		1183
3/10/76	Memo	W.C. Price	R.W. Hardy	2	CP B0002609, B0006208	1184-85
3/19/76	Memo	W.C. Price	Roff Hardy	1	CP A06024	1186
3/26/76	Ltr	W.W. McManus	I. Lizka	2		1187-88
3/26/76	Ltr	A. Autry	H. Hastings	1		1189
3/29/76	Ltr	R. Edelstein	I. Lizka	2	CP A05955-56	1190-91
3/29/76	Memo	UCC		1	CP A55751	1192
3/30/76	Ltr	M.D. Stenson	H. Hastings	4		1193-96
3/31/76	Ltr	R.W. Greenwood	T. Shockley	1	006032	1197
4/1/76	Memo			1	CP A55744	1198
4/7/76	Ltr	H.E. Hastings	A. Autry	1		1199
4/7/76	Ltr	I. Lizka	W.W. McManus	2		1200-01
4/7/76	Ltr	R. Edelstein	W.W. McManus	1	CP A5942	1202
4/8/76	Ltr	W.W. McManus	W. Colwell	2	CP A05933-34	1203-04
4/8/76	Ltr	W.W. McManus	Y. Garza, Jr.	2	CP A05960-61	1205-06
4/6/78	News	PUB Notes		3	CP A-6005-07	1207-09

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4/9/76	Ltr	M.D. Stenson	H. Hastings	3		1210-12
4/12/76	Ltr	W.C. Price	R. Greenwood	2	CP A06178-79	1213-14
4/13/76	Ltr	Y. Garza, Jr.	R. Edelstein	1	CP A55716	1215
4/13/76	Ltr	Y. Garza, Jr.	R. Edelstein	1		1216
4/13/76	Ltr	Y. Garza, Jr.	R. Edelstein	2		1217-18
4/14/76	Ltr	R. Edelstein	I. Lizka	2		1219-20
4/15/76	Ltr	I. Lizka	R. Edelstein	2		1221-22
4/16/76	Memo	A. Cisneros		4		1223-26
4/21/76	Memo	R.D. Forbus	W. Kralik	1	CP B0002591	1227
4/21/76	Memo	H.E. Hastings	I. Lizka	2		1228-29
4/22/76	Ltr	I. Lizka	R.W. Hardy	2		1230-31
4/22/76	Memo	"Terms of Agreement"		2	CP A05964-65	1232-33
4/23/76	Ltr	A. Autry	H. Hastings	1		1234
4/23/76	Ltr	A. Autry	I. Lizka	1		1235, 1236
4/23/76	Ltr	M.D. Stenson	H. Hastings	8		1237-44
No date	Memo		File	3	CP B0002576	1245-47
No date	Memo	"CP&L Response to Proposal by Al Cisneros 4/30/76"		1	CP A05963	1248
5/7/76	Ltr	M.D. Stenson	H. Hastings	3		1249-51

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5/12/76	Ltr	M.D. Stenson	H. Hastings	4		1254-57
5/25/76	Memo	Re: McManus/Cisneros		1	CP A55670	1258
No date	Memo	Re: Navigation District		1	CP A04155	1259
6/2/76	Memo & encl.	E.G. Lantz	R. Rentfro	5		1260-64
6/8/76	Memo	to file	W.C. Price	1	CP A06143	1265
6/10/76	Ltr	C.J. Steiert	H. Hastings	4		1266-69
6/14/76	Notes	E.G. Lantz	CPL/PUB/Liska	11		1270-80
No date	Notes		CPL/PUB/Lizka	6		1281-86
6/16/76	Ltr	J.A. Ferner	W. McManus	2		1287-88
6/16/76	Memo	Y. Garza, Jr.	CP&L Co.	1		1290
6/18/76	Ltr	R. Greenwood	W.C. Price	1		1290
8/2/76	Memo		W. Campbell	4	CP A55619-22	1291-94
8/2/76	Memo		W. Campbell	2	CP B0002547-48	1295-96
8/12/76	Memo	C.E. Orsak	W. Smith, Jr.	4	CP A55615-6	1297-1300
8/12/76	Memo	C.E. Orsak	W. Smith, Jr.	3	CP B0002543-45	1301-03
10/11/77	Memo	J.C. Kight	J. Dennie...	4	CP B0002477-80	1304-07

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12/5/77	Ltr	R. Greenwood	W.C. Price	2	CP A06066-7	1308-09
12/27/77	Memo	W. Kralik	W.C. Price	1	CP A06424	1310
12/20/77	Ltr	R. Greenwood	W. Kralik	2	CP 06425-26	1311-12
8/13/78	Memo	W.A. Kralik	W.C. Price	1	CP B0002853	1313
8/11/78	Ltr	R. Greenwood	W. Kralik	1	CP B0002854	1314
9/6/78	Memo	W. Kralik	T. Curlee	1	CP B0002847	1315
8/29/78	Ltr	R. Greenwood	W.C. Price	2	CP B0002848-9	1316-17
11/6/78	Notes		CAM[ast]	2	CP A06135-36	1318-19
11/13/78	Notes		CAM[ast]	1	CP B0002831	1320
12/23/78	Notes		CAM[ast]	2	CP B0002803-04	1321-22
No date	Notes		CAM[ast]	2	CP A55313-14	1323-24
No date	Notes-Map			2	CP B0002725	1325
11/16/78	Ltr	R. Jinnette	L. Gandy	2	CP A06422	1326-27
12/11/78	Ltr	W.C. Price	E. Lantz	2	CP A55114	1328-29
11/16/78	Memo	K. Cronack	File	5		1330-34
2/3/79	Ltr	W.C. Price	PUB	2		1335-36

Houston Lighting & Power Co.
(South Texas Project, Units No. 1 & No. 2)
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7/19/78	ASW 0001904-03	1366-67
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Confidentiality of these documents has been asserted pursuant either to the Stipulation to Protective Order filed July 24, 1979 (relating to documents produced by Gulf States) or to the Protective Order issued by the Board on November 7, 1979 (relating to documents produced by CSW and its affiliates.)

Brownsville does not concede that these documents are appropriately treated as confidential, and reserves the right to challenge the confidentiality of each such document.

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10/11/63	GS 36-38	1374-76
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2/1/77	CP B001549-10	1395-96
3/76	CP A58512	1397
10/29/74	CP B0017475	1398
2/5/76	CP A30738	1399
7/13/76	CP A26347 HP 0013415	1400
7/26/76	CP A26346 HP 0013414	1401
1/3/77	CP A26344 HP 0013412	1402
4/18/78	CP A23081 HL 04729	1403
No date	CP A23080 HL 0478	1404

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Houston Lighting & Power Co.
(South Texas Project, Units No. 1 and No.2)
NRC Docket Nos. 50-498A and 50-499A
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8/19/66	Ltr	R. Sheppard	W. Trommershausen	1		1472
4/25/72	Ltr	L.E. Gross	W. Siegelin	1		1473
11/9/73	Ltr	R. Alexander	L.E. Gross	3		1474-1476
7/24/75	Ltr	W. Siegelin	R. Shepperd	1		1477
8/14/75	Ltr	R. Shepperd L.E. Gross	W. Siegelin	2		1478-1479
3/11/76	Memo w/enc.	R. Wimberley	L.E. Gross R. Shepperd J.R. Lege	5		1480-1485
7/26/77	Ltr Agm	W.S. Robson L.E. Gross	R.W. Hardy	4		1486-1489
6/9/78	Ltr w/att-draft, Electric Service Contract	R. Jinnette	L.E. Gross	18		1490-1510
6/29/78	Draft	Interchange Agreement CPL-STEC/MEC		14		1511-1524
7/17/78	Ltr w/enc-draft interchange agreement dated (7/7/78)	W. Robson	G. Churchill	14		1525-1538
7/21/78		"CPL Draft, Interchange Agmt"		17		1539-1555
1/5/78	Ltr	J. Pettinos	C.F. Ham ...	1		1556
2/3/78	Ltr	J. Pettinos	C.F. Ham ...	2		1557
11/30/77	Ltr	J. Poston	M. Borchelt	2		1558-1559

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3/6/78	Ltr	J. Pettinos	H. Bassinger...	1		1563
4/5/78	Ltr	J. Pettinos	H. Bassinger...	1		1564
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7/3/78	Ltr	J. Pettinos	H. Bassinger	1		1566
No date	Draft	Mtg. between Macke, Park, Gross and Payette		3		1567-1569
No date	Rate Sch.	CPSB Economy	Energy	3		1570-1572
No date	Rate Sch.	CPSB Short-term	Firm Power	3		1573-1757
7/26/78	Ltr w/att.	J. Poston	L. Gross	4		1576-1579
9/1/78	Ltr	N. Soto	H. Bassinger	1		1580
12/1/78	Ltr	N. Soto	H. Bassinger	1		1581
No date	Agmt	STEC/MEC-CPS 138 kv Interconnection		4		1582-1858
No date	"STEC/MEC Firm Power Purchase Agmt. Questions/Answers"			28		1586-1613
12/20/78	Power Interchange and Sale Agmt. between City of San Antonio and South Texas Electric Cooperative/Medina Electric Cooperative			13		1614-1626

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1/22/79	Ltr	N. Soto	H. Bassinger..	1		1627	
11/2/73	Ltr w/att	J. White	L. Gross J.R Lege	10		1628-1637	
		"Alternative Power Supply Programs"					
9/23/74	Ltr w/att	W. Siegelin	R. Shepperd	3		1638-1640	
11/19/74	Ltr	R. Shepperd	W. Siegelin	2		1641-1642	
3/25/75	Ltr	R. Shepperd	W. Siegelin	1		1643	
No date	Notes	Handwritten		1		1644	
10/26/73	Ltr	R. Alexander	L.E. Gross	5		1645-1649	
4/7/76	Ltr	R. Shepperd	W. Siegelin	1		1650	
4/9/76	Ltr	R. Shepperd L. Gross	R. Hancock	1		1651	
7/13/77	Ltr	D. Simmons	STIS Admin. Comm.	1		1652	
8/1/77	Memo	Mgrs & Dirs.	W.S. Robson	1		1653	
8/4/77	Ltr w/att.	STIS Adm.	D. Simmons	4		1654-1657	
		STIS Operating Agmt. 8/31/77					
8/31/77	Notes	Meeting at CPL between CPL and STEC/MEC		1		1658	
11/8/77	Minutes	TIS Admin. Committee Mtg.		4		1659-1662	
2/3/78	Notes	TIS Admin. Committee Mtg.		4		1663-1666	
1/23/78	Agenda	TIS Admin. Committee Mtg. 2-3 Feb., 1978		1		1667	
No date	Notes	Admin. Committee Mtg.		1		1668	
12/9/69	Minutes w/att.	STEC-MEC Mgmt. Committee Mtg.		4		1669-1672	
2/16/78	Ltr	W.P. Smith	TIS Admin. Comm. Members	2		1673-1674	

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1/19/78	Ltr	J. Lege	J. Pettinos	1		1675
1/23/78	Ltr w/att: "TIS Transmission Facilities"	D. Simmons	TIS Admin. Committee	7		1676-1683
1/27/78	Memo w/att.	G. Coffman M. Tanner W. Taylor	TIS Admin. Committee Members	3		1684-1686
2/2/78	Rpt	"W.R. of LCRA re: TIS Wheeling Policy TIS Admin. Committee		8		1687-1694
5/12/78	Ltr	J. Lege	W. Taylor	2		1695-1696
3/5/74	Memo	L. Gross	J. Poston ..	3		1697-1699
7/26/77	Ltr	L. Gross	H. Joslin	1		1700
5/6/75	Ltr	J. Poston	L. Gross	1		1701
9/7/62	Ltr	J. Myers	D. McClelland	1		1702
9/6/62	Ltr	D. McClelland	Medina Cnty. Coop.	1		1703
5/11/61	Ltr	R. Shepperd	J. Deely	1		1704
5/9/61	Ltr	M. Matthews	J. Deely	1		1705
6/26/64	Ltr	L. Dorton	G. Hughes	2		1706-1707
No date	Notes	"Frances"	"L.E."	1		1708
8/18/64	Ltr w/att- Ltr, 8/14/64, Collins to MacManus	Maierhofer	Gross	2		1709-1710
5/2/66	Memo w/ att- Ltr, 5/2/66, Slaughter to Meyers	I.E.G.	Myers	2		1711-1712

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3/7/73	Memo w/att	D. Longoria	B. Jinnette	2		1715-1716
9/23/77	Ltr w/att- "Report of T.A.C."	M. Tanner	ERCOT	4		1717-1720
1/19/76	Ltr w/att	R. Shepperd	L. Gross	7		1721-1727
4/3/64	Memo	C. Aall	I. MacGregor	2		1728-1729
5/23/64	Ltr	F. Hofmokol	Brownsville PUB	1		1730
5/28/64	Ltr	F. Hofmokol	C. Aall	2		1731-1732
4/24/64	Memo	W. Barnard	Brownsville PUB	5		1733-1737
4/15/64		"Proposal to Public Utilities Board, City of Brownsville, Texas" by Rio Grande Valley Gas Company		3		1738-1740
8/6/64	Ltr	C. Aall	F. Hofmokol	3		1741-1743
5/26/64	Handwritten Notes			4		1744-1747
5/28/64	Handwritten Notes			2		1748-1849
5/22/64	Ltr	R. Edelstein W. Barnard	C. Aall	3		1750-1752
5/15/64	Ltr	R. Nongard	E. Joslin	1		1753
7/6/64	Ltr	W. Barnard	C. Aall	2		1754-1755
5/4/64	Ltr	R. Nongard	J. Osborne	1		1756
8/20/64	Memo	W. Barnard	Brownsville PUB	2		1757-1758
5/26/64	Notes	W. Barnard		1		1759

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1/25/80	Ltr	R. Roundtree D. Chalker w/att- ltr, 10/11/78, Roundtree to Hardy		8		1760-1767
2/15/80	Ltr	Borchelt	R. Roundtree	9		1768-1776
5/79	Ltr	N. Soto	H. Bassinger...	1		1777
4/6/79	Ltr	N. Soto	H. Bassinger...	1		1778
3/7/79	Ltr	N. Soto	H. Bassinger...	1		1779
3/29/79	Ltr	L. Loveless	C. Hamm	1		1780
2/28/79	Ltr	L. Loveless	C. Hamm	1		1781
1/29/79	Ltr	L. Loveless	C. Hamm	1		1782
5/1/79	Ltr	L. Loveless	C. Hamm	1		1783
5/22/79	Ltr	L. Loveless	C. Hamm	1		1784
11/6/79	Ltr	R. Roundtree	M. Spence	3		1785-1787
2/7/80	Ltr	M. Borchelt	R. Roundtree	1		1788
2/6/80	Ltr	L. Gawlik	J. Poston	1		1789
6/13/79	Ltr	S. Phillips	R. Roundtree	2		1790-1791
7/24/79	Ltr	R. Roundtree	M. Borchelt	2		1792-1793
9/13/79	Ltr	R. Brennick	M. Borchelt	1		1794
9/18/79		"Criteria for Negotiations for Participation"		2		1795-1796
10/25/79	Ltr	R. Roundtree	S. Phillips	4		1797-1800
11/28/79	Ltr	R. Roundtree	S. Phillips	1		1801
12/18/79	Ltr	P. McConnell	G. Spiegel	2		1802-1803
9/28/79	Ltr	L. Gawlik	W. Price	1		1804
10/23/78	Ltr	W. Price	R. Roundtree	2		1805-1806

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5/21/79	Ltr	R. Roundtree	Hardy	3		1808-1810
5/21/79	Ltr	R. Roundtree	Herring	1		1811
5/21/79	Ltr	R. Roundtree	Robson	1		1812
5/21/79	Ltr	R. Roundtree	Spruce	1		1813
5/21/79	Ltr	R. Roundtree	Davidson	1		1814
5/21/79	Ltr	R. Roundtree	Chalker	1		1815
5/21/79	Ltr	R. Roundtree	Austin	1		1816
5/21/79	Ltr	R. Roundtree	Reese	1		1817
5/21/79	Ltr	R. Roundtree	Crawford	1		1818
5/21/79	Ltr	R. Roundtree	Rodgers	1		1819
5/21/79	Ltr	R. Roundtree	Phillips	1		1820
12/14/71	Contract	PUB/CPL Power Purchase Agmt.		16		1821-1836
4/3/80	Ltr	M. Manning	K. Plumb	4		1837-1840
3/25/80	Contract	"CPL-Brownsville Inter- connection Contract"		32		1841-1872
No date	Map	"Service Area PUB Electric System"		1		1873

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7/1/73	Agmt	South Texas Project Participation Agreement, including Amendment No. 1 (12/1/73) Amendment No. 2 (3/1/75)	103	D-1
No date	Agmt	South Project 345 Kv Transmission Lines Agreement	10	D-2
12/3/79		Central and Southwest System Transmission Service Rates, Guidelines	10	D-3
9/5/72	Agmt	ERCOT Agreement	15	D-4
5/31/79	Agmt	"STIS Operating Agreement" admitting Brownsville	18	D-5
5/9/79	Ltr	J.B. Poston to STIS Administrative Committee and R. E. Roundtree w/att-TIS Coordination Agreement, as amended 3/19/74, 8/31/77 and 5/31/79	12	D-6
5/22/75		TIS Operating Guides	53	D-7
7/26/76	Ltr w/enc-	W.P. Smith to W.M. Taylor "TIS Transmission Facilities Policy Guidelines"	8	D-8
3/78	Study	Excerpts from "Staff Report on Electric Reliability Council of Texas Inter-connection and Reliability Evaluation" FERC Office of Electric Power Regulation, Fort Worth Regional Office	18	D-9
7/10/78	Ltr w/att-	R.D. Cudahy to C. Falcone "Memorandum of Comment on FERC Staff Report"	16	D-10
5/4/76	Petition & Application	FERC Docket No. E-9558 "Petition and Application of Central Power and Light Company and others for Proceedings Pursuant to Sections 202(a) and 202(b) of the Federal Power Act	16	D-11

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1/25/77	Petition	FERC Docket No. E-9578 "Petition to Intervene of Central Power & Light Company, West Texas Utilities Company, Public Service Company of Oklahoma and Southwestern Electric Power Company"	5	D-12
4/76	Report	"National Electric Reliability Council, 1975 Annual Report"	39	D-13
4/80	Report	"National Electric Reliability Council, 1979 Annual Report"	47	D-14

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6/10/75	CP A64130	1421
7/21/75	CP A64105-06	1422-23
No date	CP A 64107	1424
3/25/77	CP A64043	1425
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8/11/78	CP A05983-84	1430-31
8/11/78	CP B0003854	1432
8/8/63	CP	1433-34

Confidentiality of these documents has been asserted pursuant either to the Stipulation to Protective Order filed July 24, 1979 (relating to documents produced by Gulf States) or to the Protective Order issued by the Board on November 7, 1979 (relating to documents produced by CSW and its affiliates.)

Brownsville does not concede that these documents are appropriately treated as confidential, and reserves the right to challenge the confidentiality of each such document.

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No date	CP 06532 CP E0002725-27	1435-38
10/26/73	CP A96515-16	1439-40
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5/26/78	GS 115-116	1455-56
6/14/78	GS 117	1457
8/3/78	GS 118	1458
1/12/79	GS 119-121	1459-61
3/15/79	GS 122-125	1462-65
No date	GS 126-127	1466-67
2/1/79	GS 128-130	1468-70

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HOUSTON LIGHTING & POWER CO.
(South Texas Project, Units No. 1 & No. 2),
NRC Docket Nos. 50-498A and 50-499A

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<u>DATE</u>	<u>TYPE</u>	<u>DESCRIPTION</u>	<u>PAGES</u>	<u>DOCUMENT NO.</u>
12/1/77	Study	"Generation and Transmission Planning Study of the Electric Facilities of the Electric Reliability Council of Texas," Stagg Systems, Inc.		D-15
		Summary	15	
		Planning Study	125	
12/17/79	Study	"Economic Evaluation of Alternative Generation Expansion Plans for Electric Reliability Council of Texas and South-west Power Pool," Stagg Systems, Inc.		D-16
		Summary	74	
		Economic Evaluation	377	

HOUSTON LIGHTING & POWER CO.
(South Texas Project, Units No. 1 & No. 2),
NRC Docket Nos. 50-498A and 50-499A

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10/10/79	Study	"1979-1984 Capital Improvements Program, Electric Transmission and Distribution System, Public Utilities Board, Brownsville, Texas," Burns & McDonnell Report Supplemental Information	92 187	D-17
10/10/79	Study	"1979-1984 Capital Improvements Program, Executive Summary, Public Utilities Board, Brownsville, Texas," Burns & McDonnell	67	D-18
10/10/79	Study	"1979-1984 Capital Improvements Program, Power Supply, Public Utilities Board, Brownsville, Texas," Burns & McDonnell	197	D-19

HOUSTON LIGHTING & POWER CO.
(South Texas Project, Units No. 1 & No. 2),
NRC Docket Nos. 50-498A and 50-499A

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5/19/80	Rpt	"United States/Mexico Electricity Exchanges," United States Department of Energy and Comision Federal De Electricidad	248	D-20
8/29/80	News Release	<u>DOENEWS</u> : "U.S. and Mexico Issue Study Recommending Electricity Exchanges"	2	D-21

UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-498A
)	and 50-499A
HOUSTON LIGHTING & POWER COMPANY,)	
et al.)	
)	
(South Texas Project, Unit Nos.)	
1 and 2))	
)	
)	
)	
)	
In the Matter of)	
TEXAS UTILITIES GENERATING COMPANY,)	Docket Nos. 50-445A
et al.)	and 50-446A
)	
(Comanche Peak Steam Electric)	
Station, Unit Nos. 1 and 2)	

AFFIRMATION OF SERVICE

DISTRICT OF COLUMBIA, ss:

I, SUSAN G. WHITE, being first duly sworn, affirm that copies of the foregoing FIRST SUPPLEMENT TO BROWNSVILLE'S INITIAL BRIEF in the above-captioned proceeding have this 16th day of October, 1980 been served upon the following persons by deposit in the U.S. mail, first class, postage prepaid.

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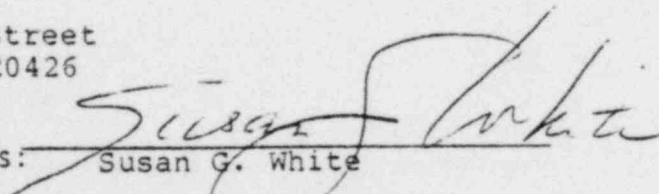
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DISTRICT OF COLUMBIA, ss:  Susan G. White

SUBSCRIBED AND SWORN TO before me, a Notary Public
in and for the City of Washington, District of Columbia, this
16th day of October, 1980

Notary Public

My Commission Expires September 30, 1984