BELATED CORRESPONDENCE

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of
CONSUMERS POWER COMPANY
(Midland Plants, Units 1 and 2)

Docket Nos. 50-329 50-330

RESPONSES TO SECOND SET OF INTERROGATORIES

1.28.17

The Dow Chemical Company ("Dow") submits the following answers to the second set of interrogatories of other Intervenors:

- 1. What is the Dow forecast of peak electrical demand in megawatts and total annual electrical energy use in megawatt hours for each of the years 1977 through 1985, assuming Midland Units No. 2 and 1 are available for commercial operation on 3/1/81 and 3/1/82, respectively? Divide the total electrical energy use and demand requirements into self-generation and purchase.
- 2. Provide the same information as in interrogatory 1, but assume that the Midland Units No. 2 and No. 1 are available for commercial operation on 12/1/81 and 12/1/82, respectively. 8008060 460

3. Provide the same information as in interrogatory 1, but assume that the Midland Units No. 2 and No. 1 are available for commercial operation on 6/1/82 and 6/1/83, respectively.

ANSWER

The Dow forecast of peak electrical demand and the total annual electrical energy use at the Midland Plant requested in Interrogatories 1, 2 and 3 are set forth below in Tables I, II and III respectively. Consumers Power has takan the position that the present Contract for Electric Service between Dow and Consumers Power, executed in January, 1974, requires Dow to purchase its electrical requirements from Consumers Power as soon as Midland Unit No. 2 is available for commercial operation. It is Dow's position that the Contract for Electric Service should not be effective until Midland Unit No. 1 is available for commercial operation and producing process steam for Dow. During the last modification of the General Agreement when the order of start-up for Midland Units 1 and 2 was reversed, a change in the Contract for Electric Service reflecting the Dow position was inadvertently omitted.

Since representatives of Consumers Power have indicated they will not correct this error in the Contract for Electric Service, the estimates in the Answers for these interrogatories are based on the existing contract language. Previous estimates supplied informally to the parties on

January 20, 1977 reflect the Dow position that the Contract for Electric Service starts when Unit #1 begins supplying steam to Dow.

It should also be noted that the estimates required by these interrogatories are very unreliable, especially for the later portion of the time period, since these estimates will be influenced by many hard-to-predict variables such as product mix and general business conditions.

Mr. J. R. Burroughs has prepared the estimates used in these interrogatories. Mr. Burroughs business address is:

The Dow Chemical Company Michigan Division

47 Building

Midland, MI 48640

Joseph G. Temple

Vice President Doy Chemical U.S.A.

Peak Month Electric Demand Megawatts

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,278,960

604,440

Total

Purchase

Total Electric Energy Use

Megawatt-Hours

,559,280

770,880

779,640

1,576,800 1,533,000 1,489,200 1,489,200

1,445,400

,489,200

1,489,200

,340,230

639,430

*Assumes peak month occurs after March 1, 1981.

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Total Electric Energy Use

Magamett-Hours

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1,489,200

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,533,000

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*Assumes peak month occurs December 1, 1981.

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*Assumes peak month accurs after June 1, 1982.

Joseph G. Temple, Jr., being duly sworn, deposes and says that the foregoing Responses to Second Set of Interrogatories are true to the best of his knowledge and

belief.

STATE OF MICHIGAN)
COUNTY OF MIDLAND)

Subscribed and sworn to before me, a Notary Public, this 28th day of January, 1977.

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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In the Matter of the Application of CONSUMERS POWER COMPANY (Midland Plant, Units 1 and 2)

DOCKET NOS. 50-329 50-330

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached "Responses to Second Set of Interrogatories," dated January 28, 1977, were served upon the individuals whose names appear on the attached Service List, by deposit in the United States mail, postage prepaid and properly addressed, on the 28th day of January, 1977.

Connie K. Miller
The Dow Chemical Company

Legal Department

47 Building

Midland, MI 48640

January 28, 1977 Attachment: Service List

SERVICE LIST

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