

SUPPLEMENTAL ARGUMENT AND REPRESENTATIONS OF TEX-LA
ELECTRIC COOPERATIVE OF TEXAS, INC., AND TUGCO

It is obvious that the opposition of Brownsville is premised on its grievances against Central Power and Light Company, a matter which is of no particular interest at this time to Tex-La Electric Cooperative of Texas, Inc., or TUGCO. What is of concern to these two parties however is that adequate time be provided to permit their representatives to make progress in settlement discussions and to avoid the adverse effect on potential settlement which may well arise from the advocacy positions which are normally stated in trial briefs.

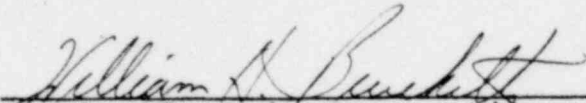
Accordingly, Tex-La Electric Cooperative of Texas, Inc., and TUGCO have a special interest above and beyond approaches to settlement involving interconnection issues; that interest relates specifically to disputed matters between these two parties. The undersigned counsel have been authorized to make the following representations in this connection.

Representatives of Tex-La and TP&L have been in negotiations regarding settlement since September 1979, following preliminary contacts dating back to the Spring of 1979.

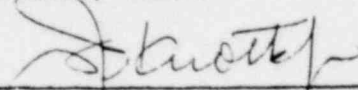
There have been a number of meetings between engineering representatives on both sides, and documents pertaining to settlement principles have been exchanged, some as recently as the last two weeks. Further exchanges of documents and meetings are contemplated for later this month, subsequent to April 14.

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Although no agreement has been reached, both parties are optimistic regarding the prospects for bringing these settlement talks to successful fruition in the relatively near future. Additional time is required for this.



Tex-La Electric Cooperative of
Texas, Inc.



Texas Utilities Generating
Company

Date: April 7, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of:

HOUSTON LIGHTING AND POWER CO.,)	Docket Nos. 50-498A
<u>et al.</u>)	50-499A
(South Texas Project, Units)	
1 and 2))	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445A
COMPANY, <u>et al.</u>)	50-446A
(Comanche Peak Steam Electric)	
Station, Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Motion for Expedited Decision" in the above captioned matters, were served upon the following persons by deposit in the United States mail, first class postage prepaid this 7th day of April, 1980, and in the case of those indicated by an asterisk, placed in the hands of a messenger service for delivery as early as possible on April 8th.

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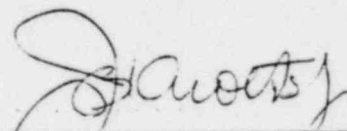
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