

INFORMATION FOR ANTITRUST REVIEW
OF OPERATING LICENSE APPLICATION FOR
WASHINGTON PUBLIC POWER SUPPLY SYSTEM'S
NUCLEAR PROJECT NO. 3

Pursuant to NRC Regulatory Guide 9.3, the Washington Public Power Supply System herewith submits certain information to the NRC Staff for its antitrust review of the operating license application for our Nuclear Project No.3 ("WNP-3").

The Pacific Northwest is a region which has had and continues to have a high degree of coordination between the various utilities in the generation and transmission of electric power, and the participation in WNP-3 reflects this coordination. This high degree of coordination has been noted by the Attorney General in his advice letter with respect to WNP-3 dated January 29, 1975, and in his advice letters with respect to Nuclear Projects Nos. 2, 1, 4 and 5 ("WNP-2," "WNP-1," "WNP-4," and "WNP-5," respectively.) 1/

There are 103 Participants in WNP-3, of which 28 are municipalities, 26 are public utility districts, 2 are irrigation districts and 47 are cooperatives. All 103 Participants are statutory preference customers of the Bonneville Power Administration ("Bonneville"). The total capability of WNP-3 has been sold to the Participants and four investor-owned utility companies.

The investor-owned companies and co-applicants are Pacific Power & Light Company (PP&L), Portland General Electric Company (PGE), Puget Sound Power & Light Company (PSP&L), and Washington Water Power Company (WWP). The companies collectively own 30% of WNP-3, divided 10, 10, 5 and 5% respectively.

The Supply System is not a utility in the traditional sense of having distribution or retail customers. Rather, it functions as a joint operating agency on a cost reimbursement (not a rate) basis.

In these circumstances and because of the high level of cooperation and coordination existing in the region, the Chief Antitrust Counsel for the NRC Staff determined, after discussions with counsel for the Supply System, that certain modifications to the information requested in Regulatory Guide 9.3 were appropriate for the WNP-2 operating license antitrust review. Similarly, the information submitted herewith follows Regulatory Guide 9.3, as modified by the Staff for this submittal.

1/ See advice letters dated January 24, 1972, (for WNP-2), April 19, 1974, (for WNP-1), February 13, 1975, (for WNP-4), and July 12, 1976 (for WNP-5).

Regulatory Guide 9.3 provides, in part, as follows:

1. To assist the regulatory staff in its review, an applicant for a license to operate a commercial nuclear power plant should consider the following items and any related changes that have occurred or are planned to occur since submission of the construction permit application:
 - a. Anticipated excess or shortage in generating capacity resources not expected at the construction permit stage. Reasons for the excess or shortage along with data on how the excess will be allocated, distributed, or otherwise utilized or how the shortage will be obtained.
 - b. New power pools or coordinating groups or changes in structure, activities, policies, practices, or membership of power pools or coordinating groups in which the licensee was, is, or will be a participant.
 - c. Changes in transmission with respect to (1) the nuclear plant, (2) interconnections, or (3) connections to wholesale customers.
 - d. Changes in the ownership or contractual allocation of the output of the nuclear facility. Reasons and basis for such changes should be included.
 - e. Changes in design, provisions, or conditions of rate schedules and reasons for such changes. Rate increases or decreases are not necessary.
 - f. List of all (1) new wholesale customers, (2) transfers from one rate schedule to another, including copies of schedules not previously furnished, (3) changes in licensee's service area, and (4) licensee's acquisition or mergers.
 - g. List of those generating capacity additions committed for operation after the nuclear facility, including ownership rights or power output allocations.
 - h. Summary of requests or indications of interest by other electric power wholesale or retail distributors, and licensee's response, for any type of electric service or cooperative venture or study.
2. Licensees whose construction permits include conditions pertaining to antitrust aspects should list and discuss those actions or policies which have been implemented in accordance with such conditions.

In response to Paragraph 1.a. In April 1982, Bonneville released a draft of its Forecasts of Electricity Consumption which projects regional energy requirements for the Pacific Northwest through the year 2000. The Bonneville

forecast was prepared as an interim planning tool pending the April 1983 publication of the Regional Council's regional electric power and conservation plan. The draft forecast projects a baseline average annual growth rate of 1.7% for the period 1980 through 2000 with a range from 0.8% to 2.5% to reflect Bonneville's estimate of the reasonable range of uncertainty. The forecast was prepared using consuming sector models that depend upon a large number of assumptions including those which are concerned with the economy, population growth, conservation programs and practices, fuel and electricity prices and technical-engineering factors. Bonneville has provided its forecast for review by independent consultants and for public comment. Bonneville expects to consider comments, revise its draft forecast and publish a final forecast during the summer of this year.

A power requirements and resources forecast for the utilities in the Pacific Northwest has been developed annually since 1954 by the PNUCC. The PNUCC 1982 Northwest Regional Forecast of Power Loads and Resources (the "PNUCC 1982 Regional Forecast"), a compilation of the forecasts submitted by, or for, each of the utilities in the region, is expected to be published in mid-May. The draft of the PNUCC 1982 Regional Forecast predicts an average annual increase in energy requirements of 2.6% per year over the period 1983 through 1993. The PNUCC forecast has historically provided the basis for long-range regional resource planning by the utilities in the region.

A study released in March 1982 by the Washington Energy Research Center for the Washington State Legislature (the "Legislative Study") predicts an average rate of growth of regional electricity sales of about 1.5% per year for the period 1980 through 2000 with rates ranging from 0.8% to 2.0% resulting from various alternative demand scenarios. Demand growth scenarios in the study were based on assumptions relating to future regional economic conditions, demographic characteristics, price induced and other conservation, end-use efficiencies, and generation costs. Because of an error in the historical data, a revision to the Legislative Study released in April 1982, indicates a growth rate of slightly over 1.6% per year for the base case. When total regional electricity sales are adjusted to include transmission and distribution losses and that electricity produced from cogeneration which was assumed in the study to reduce total requirements, the annual growth rate for the 20-year period is approximately 1.8% per year.

The following table summarizes the estimated electric energy requirements of the region for each of the above mentioned forecasts and the estimated resources available to meet those requirements based on the PNUCC resource forecast. Resource planning in the region is based on a multi-year critical period for hydroelectric resources, which is the historical water year period that, when augmented with stored water, provides the lowest expected energy production from the region's hydroelectric resources with respect to system energy requirements. During portions of most years substantial secondary energy, resulting from more favorable water conditions, is expected to be available.

REGIONAL ENERGY REQUIREMENTS AND RESOURCES
(Average Megawatts)
Estimated Requirements

<u>Year Ending June 30</u>	<u>Draft Bonneville Forecast(1)</u>	<u>Draft PNUCC 1982 Regional Forecast(2)</u>	<u>Legislative Study Forecast(3)</u>	<u>Estimated Total Resources</u>
1983	17,849	18,702	18,035	18,592
1984	17,819	19,180	18,237	18,782
1985	17,964	19,772	18,580	19,517
1986	18,256	20,332	19,076	19,800
1987	18,718	21,030	19,585	20,237
1988	19,258	21,692	20,108	20,325
1989	19,650	22,176	20,611	20,292
1990	20,067	22,687	21,154	21,351
1991	20,445	23,195	21,489	21,878
1992	20,785	23,686	21,836	22,334
1993	21,142	24,176	22,186	22,971

- (1) Includes transmission losses. Adjusted to include reserves and exports as projected in the draft PNUCC 1982 Regional Forecast.
- (2) Includes transmission losses, reserves and exports. Adjusted to exclude Bonneville's interruptible loads.
- (3) Adjusted to include transmission and distribution losses assumed in the Legislative Study at 7.5% of sales in each year, exports and that electricity from cogeneration assumed in the study to reduce total requirements.
- (4) Based on the draft PNUCC 1982 Regional Forecast of resources and after deducting reserves under PNUCC planning guidelines. Assumes critical water conditions. Substantial secondary energy is expected to be available under most stream flow conditions. All resources forecasted under these guidelines are licensed for construction except Puget Sound Power & Light Company's Skagit Nuclear Units Nos. 1 and 2 and The Washington Water Power Company's Creston Coal Units Nos. 1, 2 and 3.

In response to Paragraph 1.b, this will advise that no new power pools or coordinating groups have been established since completion of the WNP-3 construction permit antitrust review. There are four principal organizations in the Pacific Northwest through which the high degree of coordination between the various utilities in the region is maintained. The Northwest Power Pool, a voluntary organization of public, investor-owned, and federal power suppliers, was established in 1942, to coordinate power operations in the Pacific Northwest. The Northwest Power Pool is still functioning on an effective basis.

As the complexities of power supply increased in the region, other groups were formed. The PNUCC, consisting of public and investor-owned utilities in the Pacific Northwest, was formed in the late 1940s, to extend the coordination

established in the Northwest Power Pool into other areas, including the advanced planning of power resources. In addition, the Public Power Council was formed in the late 1960s, to further the coordination of the public power groups in their efforts to improve supply in the region. The Public Power Council represents over 100 publicly-owned utilities and cooperatives.

There have been no significant changes in structure, activities, policies, or practices of these organizations since completion of the WNP-3 construction permit antitrust review. Of course, membership in these organizations changes occasionally as entities join or withdraw from the organizations. However, membership in these organizations is open and voluntary, to the end that all utilities which desire to participate may do so.

Most recently, the Pacific Northwest Electric Power and Conservation Planning Council ("PNEPCPC") was established and held its first meeting in April 1981. The PNEPCPC was authorized by the Pacific Northwest Electric Power Planning and Conservation Act ("Regional Power Act") which was enacted in December 1980 (Pub.L. 96-501). The PNEPCPC is composed of two representatives from each of the states of Idaho, Oregon, Washington and Montana.

The PNEPCPC is to prepare and adopt a Regional Electric Power and Conservation Plan ("Regional Plan") within two years after it is formed and is to prepare and adopt a program to protect, mitigate and enhance fish and wildlife on the Columbia River and its tributaries. The Regional Plan must set forth a general scheme for implementing conservation measures and developing the resources required by Bonneville to meet its obligations, and must also incorporate the fish and wildlife program. The Regional Plan shall give priority to resources which the PNEPCPC determines to be cost-effective, with priority among cost-effective resources given: first, to conservation; second, to renewable resources; third, to generating resources utilizing waste heat or which are of high fuel conversion efficiency; and fourth, to all others. Also, due consideration is required to be given to environmental quality; resource compatibility with the existing regional power system; protection, mitigation and enhancement of fish and wildlife; and other criteria as may be set forth in the Regional Plan. These same priorities and considerations guide Bonneville's resource acquisition determinations.

The Regional Power Act substantially changed the power supply program of the Pacific Northwest utilities, Bonneville and Bonneville's direct service industrial customers. The Regional Power Act obligates Bonneville to meet the firm energy requirements of all requesting Pacific Northwest utilities, including the Participants, to the extent these requirements exceed their own resources used in the year prior to December 5, 1980, or subsequently committed to meet their own loads.

Provisions of the Regional Power Act: (i) require Bonneville to offer to sell power to each requesting Pacific Northwest utility, including each Participant, to meet its firm power loads in the region in excess of such utility's own committed resources; (ii) require Bonneville to offer to exchange power with Pacific Northwest investor-owned utilities for residential and farming uses

and to establish rates for such power that are the same as the rates paid by public bodies, cooperatives and federal agencies, and require such utilities to pass the cost benefits of any such exchanges through to these consumers; (iii) require Bonneville to offer to sell power to its existing direct service industrial customers under new long-term contracts; (iv) require Bonneville to meet its obligations to provide power through conservation to the extent that conservation is cost effective; and (v) authorize Bonneville to provide financial assistance for conservation measures and construction of renewable resources and to borrow from the Federal Treasury to obtain funds for such assistance.

Pursuant to Net Billing Agreements which the Supply System, Bonneville, and each Participant in WNP-3 have executed, each Participant has assigned to Bonneville its share of the capability of WNP-3. In consideration of these assignments, Bonneville will offset or credit the amounts paid by the Participants to the Supply System for WNP-3 against amounts owed Bonneville by the Participants for power and services purchased under contracts with Bonneville. In effect, Bonneville has purchased the seventy percent of the capability of WNP-3 in this manner. The power received by Bonneville from WNP-3 will be integrated into the Bonneville grid for sale at wholesale to its customers.

The Regional Power Act does not dilute or diminish Bonneville's ability to meet its existing obligations under the Net Billing Agreements or the agreements with the Companies for their share of the WNP-3 capability, which remain as preexisting Bonneville obligations. However, the Regional Power Act increases the number of options available to the sponsors of generating resources, and provides mechanisms for the sharing of the risks and costs of new generation on a region-wide basis. In order to meet Bonneville's increased power sales obligations outlined above, the Regional Power Act grants it authority to acquire by purchase the capability of output of electric generating resources to be constructed by resource sponsors. The Regional Power Act does not give Bonneville authority to own or construct any generating resources. Rather, Bonneville is required to acquire from other entities whatever power resources are needed to enable Bonneville to meet its new contractual obligations.

To the extent that Pacific Northwest utilities place their requirements on Bonneville through execution of new net requirements power sales contracts, Bonneville will be required to provide the resources necessary to eliminate forecasted regional power deficits. This means that Bonneville must attempt to acquire, on a long-term basis, any qualified power resource (and otherwise, on a short-term basis, any resource) that is needed by Bonneville to enable it to fulfill its new power sales obligations.

In January 1981, Bonneville advised its customers, that if they had previously planned to meet a portion of their load with their own resources and now plan to place that load requirement on Bonneville, then Bonneville considers it reasonable to obtain an option on such resource to enable Bonneville to meet the same load.

In response to Subparagraph 1.c(1), this will advise that the Supply System does not have a transmission network. The entire output of WNP-3 will be delivered by the Supply System to Bonneville at the Satsop substation, a short distance from WNP-3, on the Project site. This approach as to transmission has not changed since completion of the WNP-3 construction permit antitrust review.

With respect to Subparagraphs 1.c(2) and (3), and Paragraphs 1.e, 1.f, 1.g, and 1.h, the NRC Staff modified the request for information in view of the unique ownership arrangements of WNP-3 and close relationships of utilities in the region such that responses are to be provided only for those Participants or owners of WNP-3 which have facilities for transmission to wholesale customers of bulk power at wholesale. The Participants who have such facilities will be referred to hereinafter as "transmission Participants." Of the 103 Participants in WNP-3, the Supply System had previously determined that three Participants may be properly characterized as transmission Participants, viz., Consumers Power, Inc. (a cooperative), Public Utility District #1 of Gray's Harbor County, and Public Utility District #1 of Okanogan County.

Additionally the Supply System, in consultation with the BPA, has identified six additional "wheeling" arrangements which have developed, within to provide emergency capabilities or due to new or alternative feed points from the regional system. These arrangements indicate even greater levels of regional cooperations, have no anti-trust verifications and will not be discussed further herein.

In response to Subparagraphs 1.c(2) and (3), this will advise that there have been no changes in transmission by these transmission Participants with respect to interconnections or connections to wholesale customers since completion of the WNP-3 construction permit antitrust review.

In further response to Subparagraphs 1.c (2) and (3) each of the investor-owned utilities has facilities for transmission to wholesale customers of bulk power at wholesale. The interconnection changes since the construction permit are summarized by utility in Table I. The changes in connections to new wholesale customers are found in Table II.

In response to Paragraph 1.d, this will advise that there have been no changes in ownership or contractual allocations of the output of WNP-3 since the construction permit antitrust review.

Incidentally, this will advise that Public Utility District #1 of Okanogan County became a member of the Supply System in 1976, raising the membership to 23 members, including the cities of Ellensburg, Richland, Seattle, and Tacoma, and 19 public utility districts.

In response to Paragraph 1.e, this will advise that the Supply System is a joint operating agency of the State of Washington which is legally empowered to acquire, construct, and operate facilities for the generation and transmission of electric power. It does not sell electricity directly to customers,

and does not have rate schedules. Accordingly, there have been no changes in design, provisions or conditions of rate schedules with respect to the Supply System. With respect to the transmission Participants in WNP-3 while there have been changes in rates per se, there have been no substantial changes in design, provisions, or conditions of wholesale rate schedules since completion of the construction permit antitrust review.

In response to Paragraph 1.f, this will advise that the transmission Participants in WNP-3 have no new wholesale customers, have made no transfers from one rate schedule to another, and have made no changes in service areas relative to the status of these considerations at the time of completion of the WNP-3 construction permit antitrust review. This will also advise that neither the Supply System nor any of the transmission Participants in WNP-3 have acquired or merged with any other entity since completion of the WNP-3 construction permit antitrust review.

In further response to Paragraph 1.f, in the case of the investor-owned utilities, the majority of the changes are disclosed in response to 1.c.(3). Additionally, the City of Ashland, Oregon, has ceased to be a wholesale customer of Pacific Power and now obtains its bulk power supply from the Bonneville Power Administration. Otherwise, Pacific Power has not transferred any of its wholesale customers from one rate schedule to another; has not experienced any significant changes in its service territory except for minor adjustments with neighboring utilities to improve efficiency of service and in situations where publicly owned utilities have appropriated portions of Pacific Power's service areas; and has not merged with any other operating utilities. Pacific Power has recently acquired Consumers Lite and Power Company, a small farmer-owned cooperative located in northwestern Wyoming, which had previously purchased power from the U.S. Bureau of Reclamation.

PGE has no new wholesale customers and has made no significant changes in service areas since completion of the WNP-3 construction permit antitrust review. Additionally, PGE has not acquired or merged with any other entity since completion of the WNP-3 construction permit antitrust review.

PSP&L has no new wholesale customers and has made no significant changes in service areas since completion of the WNP-3 construction permit antitrust review. Additionally, PSP&L has not acquired or merged with any other entity since completion of the WNP-3 construction permit antitrust review.

WWP has no new wholesale customers and has made no significant changes in service areas since completion of the WNP-3 construction permit antitrust review. Additionally, WWP has not acquired or merged with any other entity since completion of the WNP-3 construction permit antitrust review.

In response to Paragraph 1.g, this will advise that the Supply System has been constructing four additional nuclear power reactors designated WNP-2, WNP-1, WNP-4 and WNP-5 pursuant to NRC construction permits. WNP-2 is presently scheduled to begin commercial operation in February 1984. There are 94 Participants in WNP-2, consisting of 27 municipalities, 21 public utility

districts, 1 irrigation district, and 45 cooperatives, all of which are statutory preference customers of Bonneville. Of the total capability of WNP-2, the municipalities have contracted to purchase 22.6%, the districts have contracted to purchase 56.9%, and the cooperatives have contracted to purchase 20.5%.

Until recently WNP-1 was scheduled to begin commercial operation in June 1986. The Supply System and the Bonneville Power Administration recently decided to implement an extended construction delay on WNP-1. The total capability of WNP-1 has been sold to the Participants and five investor-owned utility companies, the same four as for WNP-3 and the Montana Power Company. Of the total capability of WNP-1, the Participants have contracted to purchase 67.53% during the period from July 1, 1980, to June 30, 1996, and 100% thereafter. The companies have contracted to purchase 32.47% during the period from July 1, 1980, to June 30, 1996. As payment for the sale of this portion of WNP-1 to Bonneville, Bonneville has agreed to furnish to each such company 80,000 kilowatts of capacity and 68,000 kilowatts of average annual energy.

With respect to WNP-4 and WNP-5, construction has been terminated.

With respect to the transmission Participants in WNP-3, this will advise that Grays Harbor PUD is participating in WNP-2 and WNP-1 in the following percentages of total output: WNP-2 (3.075%) and WNP-1 (1.862% in 1986-1996; 2.758% thereafter). Consumers Power, Inc. (a cooperative) is participating in WNP-2, WNP-1, WNP-4, and in the Boardman coal plant constructed by Portland General Electric Company, in the following percentage shares: WNP-2 (.453%), WNP-1 (0.721% in 1986-1996; 1.068% thereafter), and Boardman (10%). ^{2/} Okanogan PUD is participating in WNP-2 and WNP-1 in the following percentage shares: WNP-2 (1.042%) and WNP-1 (0.174% in 1986-1996; 0.257% thereafter). Okanogan also began receiving power from Wells Dam, a 774 megawatt hydroelectric facility in September 1976. Okanogan's initial share of Wells Dam was 0.6% of capacity (4.64 MW), and its share will increase on a sliding scale to 8% of capacity (61.92 MW) in 1988.

With respect to the investor owned utility owners, at this time the only future generating capacity additions committed for operation by Pacific Power & Light after the scheduled commercial operation date for WNP-3 (1986) are Wyodak Unit No. 2 (330 MW coal-fired plant initially scheduled for commercial operation in 1986, but for which commencement of construction has been delayed for an indefinite period); and Skagit/Hanford Units 1 and 2 (1275 MW nuclear plants scheduled for completion in 1991 and 1993, respectively). Pacific Power will own 80% of Wyodak Unit No. 2 and 20% of Skagit/Hanford Units 1 and 2.

^{2/} The 10% output allocation for the Boardman facility represents the Pacific Northwest Generating Company's share of the Boardman plant. This 10% share will be divided among the 17 participating cooperatives in the Pacific Northwest Generating Company. Consumers Power, Inc. is participating in the Boardman plant through the Pacific Northwest Generating Company.

Portland General Electric Company is participating in Skagit/Hanford Nuclear Plants No. 1 and No. 2 and Pebble Springs Nuclear Plants No. 1 and No. 2 in the following percentages of total output: Skagit/Hanford Nuclear Plants No. 1 and No. 2 (30 percent) and Pebble Springs Nuclear Plants No.1 and No. 2 (47.1 percent).

The Puget Sound Power and Light Company has a 25% share in Colstrip Units 3 and 4, a two-unit, 700 MW (net) each coal-fired facility currently under construction at Colstrip, Montana. The Colstrip Project is sponsored by the Montana Power Company. The Puget Sound Power and Light Company, as Project Sponsor, is in the process of obtaining a construction permit for the two-unit

1275 MW (net) each Skagit/Hanford Nuclear Project at Hanford, Washington. The Company plans to own 40% of the Project. The Puget Sound Power and Light Company also plans to participate with a 25% ownership in the proposed Creston Project which is a four-unit, 500 MW each facility at Creston, Washington.

The Washington Water Power Company has a 15% ownership in Colstrip Units #3 and #4, a two-unit, 700-MW (net) each coal-fired facility presently under construction at Colstrip, Montana. The Colstrip Project is sponsored by The Montana Power Company. The Washington Water Power Company is also building a 40-MW wood-waste fuel facility at Kettle Falls, Washington. The Washington Water Power Company is presently applying for a siting certificate for a four-unit, 500-MW each facility at Creston, Washington. The Company plans to own 25% of the Creston Project. The Washington Water Power Company has agreed to participate with a 10% ownership in the proposed Skagit/Hanford Project.

In response to Paragraph 1.h, this will advise that because the Supply System has terminated projects WNP-4 and WNP-5 we have received indications of interest relative to the projects. Such expressions of interest are best characterized as speculative in nature at this time. The Supply System declined the opportunity to participate in the Skagit nuclear plant proposed by Puget Sound Power and Light Company. The Supply System (and the transmission Participants in WNP-3 through the Supply System) and the investor owned utilities have participated in certain cooperative generic studies with respect to items of common interest to utilities in the Pacific Northwest. These studies are of no significance to antitrust considerations. For example, the Supply System participated in a joint study by several utilities in the Pacific Northwest of the 1872 North Cascades earthquake which is of common interest to all utilities in the region.

The four investor owned utilities have taken a number of actions toward cooperative ventures. In particular since completion of the WNP-3 construction permit antitrust review, Pacific Power & Light Company has been involved in the following matters relating to cooperative development of generating facilities with other wholesale or retail distributors of electrical service:

- (a) In response to an order of the Montana Board of Natural Resources and Conservation, the owners of Colstrip Units 3 and 4 (including Pacific

Power) offered ownership interests in those plants to a number of publicly owned utilities in Montana. After extensive negotiations, the publicly owned utilities declines to participate.

- (b) Pacific Power has been offered, but has declined, an ownership interest in the Creston, Washington, coal-fired generating plant being proposed by the Washington Water Power Company.
- (c) Pacific Power & Light Company and Black Hills Power and Light Company have tentatively agreed jointly to construct Wyodak Unit No. 2.
- (d) Pacific Power and the three other Pacific Northwest investor-owned utilities involved in WNP-3 have formed Northwest Energy Services Company (NESCO) to provide initial planning, siting, and construction management services for future generating resources in this region.
- (e) Pacific is currently involved in five projects which have been submitted to the Bonneville Power Administration as unsolicited research and development proposals regarding alternative energy sources.
- (f) Pacific Power has held various levels of discussions with a number of utilities and private concerns who are interested in building major or minor generating facilities and who wish Pacific Power to join in the development of these projects or purchase output from them. Pacific Power has not entered into any formal arrangements with these concerns other than those mentioned above to supply power to Pacific Power's customers.

As noted in response to question 1.g, Portland General Electric is participating in Skagit/Hanford Nuclear Plants No. 1 and No. 2 with Puget Sound Power & Light Company, Pebble Springs Nuclear Plants No. 1 and No. 2 as sponsor, and Colstrip (coal-fired) Plants No. 3 and No. 4 with The Montana Power Company.

Puget Sound Power & Light Company is participating in the Colstrip, Creston and the Skagit/Hanford Nuclear Project.

The Washington Water Power Company is also participating in the Colstrip, Creston and Skagit/Hanford Nuclear Project.

Since completion of the WNP-3 construction permit antitrust review, these investor-owned utilities have participated in other cooperative ventures and studies which are of no significance to antitrust considerations. They have not received any requests or indications of interest by electric wholesale or retail distributors (utilities) to purchase portions of WNP-3 since completion of the WNP-3 construction permit antitrust review.

With respect to Paragraph 2, since the construction permits for WNP-3 included no conditions pertaining to antitrust aspects, no discussion is necessary.

TABLE 1

PACIFIC POWER & LIGHT COMPANY

Interconnection Additions	Voltage	Utility	Year in Service
Buffalo, Wyo. Gillette, Wyo.	230 KV (C/I 161 KV)	Black Hills P&L	1975
Jim Bridger Plant, Wyo. to Borah Sub., Idaho	345 KV	Idaho Power	1975
Albina-Harrison Line Lap, Ore. to Holladay Sub., Ore.	115 KV	Port. Gen. Elec.	1975
Jim Bridger Plant, Wyo. to Kinport Sub., Idaho	345 KV	Idaho Power	1976
Fry Sub., Ore. to Conser Lap, Ore.	115 KV	BPA	1976
USCE Lost Creek Plant, Ore. to Prospect-Lone Pine, Ore.	115 KV	US Corp. of Eng.	1976
BPA Alvey-Oakridge Line, Ore. to Pleasant Hill Sub., Ore.	115 KV	BPA	1976
BPA Troutdale Sub., Ore. to Linneman Sub., Ore.	230 KV	BPA & PGE	1976
BPA Lion Mt., Mont. to Lion Mt. Sub., Mont.	230 KV	BPA	1978
D. J. Plant, Wyo. to Tri-State Difficulty Sub., Wyo.	230 KV	Tri-State G.&T.	1978
D. J. Plant, Wyo. to Basin Electric Laramie River, Wyo.	230 KV	WAPA	1978
Priest River Sub., Idaho to Albeni Falls Line, Idaho	115 KV	BPA	1979
TWWP Co., Idaho to Oden Sub., Idaho	115 KV	Wash. Water Pw.	1979
Malin Sub., Ore. to Meridian Sub., Ore.	500 KV	(a)	1980
BPA Trumbull Cr., Mont. to Trumbull Cr. Sub., Mont.	230 KV	BPA	1980
BPA Redmond, Ore. to Prineville Sub./Harney Tap (Emerg.) Ore.	115 KV	BPA	1981
Riverton Sub., Wyo. to Tri-State Riverton, Wyo.	230 KV	Tri-State G.&T.	1981
WAPA to Wagonhound Sw. Sta., Wyo.	115 KV	WAPA	1981
Malin Sub., Ore. to Midpoint Sub., Idaho	500 KV	(b)	1981
Black Forks Sub., Wyo. to B.V.E.A. Sweetwater Sub., Wyo.	230 KV	Deseret G&T	1981
Interconnection Reductions			
Sold to the Springfield Utility Board, Ore. in 1975			
Springfield Sub., Ore. to Laura St., Sub., Ore.	69 KV		
Springfield Sub., Ore. to South Bank Middle Fork Willamette River, Ore.	69 KV		

TABLE 1 (Cont'd)

PACIFIC POWER & LIGHT COMPANY

<u>Interconnection Reductions</u>	<u>Voltage</u>	<u>Utility</u>	<u>Year in Service</u>
Alvey-Springfield 115 KV Line to Jasper Sub., Ore.	115 KV		
Springfield Sub., Ore. to South Bank, Middle Fork Willamette River, Ore.	115 KV		
Springfield Sub., Ore. to BPA Springfield Sub., Ore.	115 KV		
Sold to the Northern Wasco County PUD, Ore. in 1976			
The Dalles Sub., Ore. to Columbia Hts. Sub., Ore.	115 KV		
Columbia Hts. Sub., Ore. to BPA Eddy Sub., Ore.	115 KV		
The Dalles Sub., Ore. to N-S Section of Mosier Sub.	69 KV		
The Dalles Sub., Ore. to BPA The Dalles Sub., Ore.	115 KV		
The Dalles Sub., Ore. to BPA Maupin Sub., Ore.	69 KV		
(a) BPA, PGE, PG and E and USBR			
(b) BPA, Idaho Power, PGE, PG and E and USBR.			

WASHINGTON WATER POWER COMPANY

<u>Interconnection Additions</u>		<u>Voltage</u>	<u>Utility</u>	<u>Year in Service</u>
Hatwai-Lolo-Hatwai Connection	Lewiston, ID	230 KV	BPA	1975
Hatwai-Moscow-Hatwai Connection	Lewiston, ID	230 KV	BPA	1975
Beacon-Rathdrum Line-Moab Sub Tap	Spokane, WA	115 KV	Inland Power & Light	1975
Sifford-Orin Line-Matchip Tap	Colville, WA	60 KV	Metalurgical Chip Co.	1975
Cabinet-Sandpoint Line-Oden Sub Tap	Hope, ID	115 KV	Pacific Power & Light	1975
Addy-Long Lake Line-BPA Addy Sub Tap	Addy, WA	115 KV	BPA	1976

TABLE 1 (Cont'd)

WASHINGTON WATER POWER COMPANY (Cont'd)

Interconnection Additions		Voltage	Utility	Year in Service
Lind-Long Lake Line-Gaffnet Tap	Sprague, WA	115 KV	Lincoln Electric Co-op	1976
Long Lake-Stratford Line-Irby Tap	Odessa, WA	115 KV	Lincoln Electric Co-op	1977
E. Colfax-Sunset Line-Nangman Tap	Spokane, WA	115 KV	Inland Power & Light	1977
E. Colfax-Moscow Line-Armstrong Tap	Pullman, WA	115 KV	Inland Power & Light	1978
Albeni-Post Falls Line-Hoodoo Tap	Blanchard, ID	115 KV	Inland Power & Light	1978
E. Colfax-Lind Line-Ralston Tap	Ralston, WA	115 KV	Big Bend Electric Co-op	1980
Larson-Stratford Line-Round Lake Tap	Stratford	115 KV	Grant County PUD	1980
BPA Bell-Colville Line-Loon Lake Tap	Loon Lake, WA	115 KV	Washington Water Power	1981

TABLE 11
New Wholesale Power Customers Since 1975
Pacific Power Light Company

							EPC FILING NOS.		
	STATE	CONTRACT NO.	EFFECTIVE DATE	OTHER PARTY	STATE	PPL FILING DATE	SCHED	SUPPL	EFFECTIVE DATE
20 MILLS/KWH - NON FIRM									
EL PASO ELECT. CO.		LETTER AGREEMENT	05/05/78	EL PASO	WYO	05/31/78	138		07/21/78
NEBRASKA PUBLIC POWER DISTRICT		LETTER AGREEMENT	12/13/79	NPPD	WYO	12/28/79	174		01/01/80
SAN DIEGO GAS & ELECTRIC CO.		LETTER AGREEMENT	03/08/79	SDG&E			161		03/08/79
CITY OF PASADENA		LETTER AGREEMENT	03/12/79	PASADENA			162		03/12/79
CITY OF GLENDALE		LETTER AGREEMENT	03/12/79	GLENDALE			164		03/13/79
CITY OF BURBANK		LETTER AGREEMENT	03/12/79	BURBANK			163		03/13/79
PACIFIC GAS & ELECTRIC CO.		LETTER AGREEMENT	03/12/79	PG&E			167		03/12/79
CITY OF LOS ANGELES		LETTER AGREEMENT	03/09/79	L.A.			166		03/09/79
SOUTHERN CALIFORNIA EDISON CO.		LETTER AGREEMENT	03/09/79	SCE			168		03/09/79
SALT RIVER PROJECT AGRI & IMP., A POWER DISTRICT		LETTER AGREEMENT	06/18/79				170		09/13/79
MONTANA POWER COMPANY		LETTER AGREEMENT	10/03/79	MPC	WYO	11/09/79	171		10/03/79
TUCSON GAS & ELECTRIC CO.		LETTER AGREEMENT	09/28/79	TG&EC	WYO	10/31/79	172		10/01/79
PUGET SOUND POWER & LIGHT CO.		LETTER AGREEMENT	09/01/79	PSP&L					
29 MILLS - NON FIRM									
TRI STATE GEN. & TRANS.	WYO	29 MILLS/KWH	04/25/80	TRI STATE	WYO	05/08/80	196		06/16/80
ARIZONA PUBLIC SERVICE CO.	WYO	29 MILLS/KWH	04/28/80	APS	WYO	07/14/80	180		06/16/80
SAN DIEGO GAS & ELECTRIC CO.	CALIF	29 MILLS/KWH	04/28/80	SDG&E	WYO	07/14/80	194		04/22/80
PACIFIC GAS & ELECTRIC CO.	CALIF	29 MILLS/KWH	04/29/80	PG&E	WYO	07/14/80	188		04/23/80
CITY OF BURBANK	CALIF	29 MILLS/KWH	04/23/80	BURBANK	WYO	07/14/80	182		04/23/80
IDAHO POWER CO.	IDA	29 MILLS/KWH	04/28/80	IPC	WYO	07/14/80	184		06/16/80
NEBRASKA PUBLIC POWER DISTRICT	WYO	29 MILLS/KWH	05/09/80	NPPD	WYO	06/03/80	187		06/16/80
CITY OF GLENDALE	CALIF	29 MILLS/KWH	04/21/80	GLENDALE	WYO	07/14/80	183		04/23/80
CITY OF LOS ANGELES	CALIF	29 MILLS/KWH	04/21/80	L.A.	WYO	07/14/80	185		04/22/80
BLACK HILLS POWER & LIGHT	SD	29 MILLS/KWH	04/21/80	B.H.	WYO	05/19/80	181		05/14/80
SOUTHERN CALIFORNIA EDISON	CALIF	29 MILLS/KWH	04/22/80	SCE	WYO	06/20/80	195		04/22/80
MONTANA POWER COMPANY	MONT	29 MILLS/KWH	04/23/80	ML&P	WYO	06/20/80	186		06/16/80
TUCSON GAS & ELECTRIC CO.	WYO	29 MILLS/KWH	04/24/80	TG&EC	WYO	06/20/80	197		06/16/80
PASADENA WATER & POWER DEPT.	CALIF	29 MILLS/KWH	05/27/80		WYO	06/20/80	189		04/22/80
PUBLIC SERVICE CO. OF NEW MEXICO	WYO	29 MILLS/KWH	06/03/80	PNM	WYO	07/14/80	192		06/16/80
PUBLIC SERVICE CO. OF COLORADO	WYO	29 MILLS/KWH	04/29/80	PSC	WYO	06/23/80	191		06/16/80
SALT RIVER PROJECT	WYO	29 MILLS/KWH	07/12/80		WYO	07/14/80	193		06/16/80
PLATTE RIVER POWER AUTHORITY	WYO	29 MILLS/KWH	07/31/80				190		06/16/80
UTAH POWER & LIGHT CO.	WYO	29 MILLS/KWH	08/18/80				198		06/16/80
WASHINGTON WATER POWER CO.	WASH	29 MILLS/KWH	04/08/80				199		04/11/80
SIERRA PACIFIC POWER CO.	CALIF	29 MILLS/KWH	11/18/80		WYO		205		12/03/80
DESERT	UT	29 MILLS/KWH	08/16/81		UT				
SANTA CLARA ELECTRIC DEPT.	CALIF	29 MILLS/KWH	08/18/81	PP&L	WYO	08/31/81			
36 MILLS - SHORT TERM FIRM									
PACIFIC GAS & ELECT. CO.	CA	36+ MILLS	04/01/81			04/22/81	209		04/01/81
SOUTHERN CALIFORNIA EDISON	CA	36+ MILLS	04/01/81			06/29/81	210		04/01/81
IDAHO POWER CO.	ID	36+ MILLS	07/01/81				208		07/01/81
BONNEVILLE POWER ADMINISTRATION	OR	36+ MILLS	09/01/81						
SAN DIEGO GAS & ELECTRIC CO.	CA	36+ MILLS	09/01/81				215		09/01/81
PACIFIC GAS & ELECT. CO.	CA	36+ MILLS	09/01/81				216		09/01/81
TORRINGTON, TOWN OF									
	WYO	FIRM SALE	07/30/76		WYO	08/11/76	126		08/25/76
		SUPPLEMENT NO. 1	10/01/79				126	1	11/21/79
		SUPPLEMENT NO. 2	06/01/81		WYO	04/03/81	126	2	06/01/81
		LETTER AGREEMENT	04/01/81		WYO	04/20/81			