



Public Service™

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DOCKET NUMBER
PROPOSED RULE

13
170, 171
(53FR24077)

Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

R.O. WILLIAMS, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

July 25, 1988
Fort St. Vrain
Unit No. 1
P-88278

Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Docketing and Service Branch

Docket No. 50-267

SUBJECT: Comments on Proposed Rule 10 CFR
Parts 170 and 171

Gentlemen:

In response to Notice of Proposed Rule dated June 27, 1988 concerning modifications to 10 CFR Parts 170 and 171, Public Service Company of Colorado (PSC) hereby submits comments on the Proposed Rule.

The Commission proposes modifications to 10 CFR Parts 170 and 171 that make licensing fees more appropriate to NRC costs incurred in providing services to each reactor. The proposed rule is the result of a requirement imposed by Congress, that the NRC collect at least 45% of its budget from licensees.

The Commission has requested specific comments on a second option that would defer the effect of changes to Part 170 until next year. This would avoid revising charges that may already have been billed for Part 170 services. PSC supports this second option and recognizes that any additional money required this year will have to be made up under Part 171 fees.

In addition to the changes proposed, PSC suggests that Section 171.11, Exemption, be revised to include consideration of rate base treatment of Part 170 and 171 fees. Some utilities are unable to recover the proposed new fees through increased rates while others are able to recover the increased costs. For the utilities that

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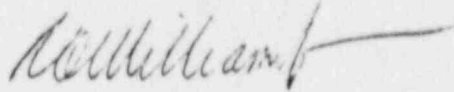
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cannot recover the increased fees, the impact of the proposed fees constitutes a rate reduction without appropriate hearing.

Should you have any questions regarding Public Service's comments, please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. O. Williams, Jr.", followed by a long horizontal flourish.

R. O. Williams, Jr.
Vice President
Nuclear Operations

ROW/JW:brc

cc: NRC Document Control Desk