

In the Matter of
HOUSTON LIGHTING AND POWER CO.
(Allens Creek, Unit 1)
Docket #50-166
8/10/79



TexPIRG RESPONSES TO HL&P MOTION TO COMPEL
To the Honorable Board:

TexPIRG is in receipt of a Motion by Applicant to compel responses to interrogatories by Intervenor TexPIRG, McCorkle, and Hinderstein.

For TexPIRG's part, TexPIRG would inform the Board that Intervenor intends to respond to the interrogatories in question as quickly as possible, and certainly envisions making such responses by the ten day-from-proposed Order date stated by HL&P's motion.

However, so that the Board is aware of TexPIRG's good faith efforts to make such information available, TexPIRG will clearly state the reason for the tardiness.

Many of HL&P's interrogatories were follow-ups to the Applicant's deposition of TexPIRG witness Andrew Sansam. So, these interrogatories were provided to Mr. Sansam, who is not an employee of TexPIRG, for his analysis. On the proximate date the responses were due, Mr. Sansam's home in Brazoria County was flooded by rain from a tropical storm* and for many days telephone contact could not be made with him. Mr. Sansam now informs us that he was, by necessity, involved in the repair of damage to his home during the past weeks. Now that this unfortunate event has passed, TexPIRG anticipates the responses will be readily forthcoming. TexPIRG requests the Board's understanding in this matter, and states for the record that the organization has made a diligent and good faith effort to meet its duties in the appropriate time periods, and will continue to do so in the future.

Respectfully/

/ Clarence Johnson, Exec. Dir.

cc: all parties

* The weather bureau reports that some areas of Brazoria County received 25 inches of rain in 24 hours--supposedly a once-in-500 year flood. Mr. Sansam, as of yet, has not had electrical service restored by HL&P, and incidentally reports that such failure has made typing difficult on his electric typewriter.

POOR ORIGINAL

7910090 190

G 1116 025