

A circular library stamp from the University of Toronto Libraries. The text "UNIVERSITY OF TORONTO LIBRARIES" is arranged in a circle around the perimeter. In the center, the date "1979" is printed, with a small "7" to its right. Below the date, the word "JAN" is visible, indicating the month of January.

Docket Nos. 50-445A
50-446A

043

with 10 C.F.R. § 2.740(e) to add to, alter, amend or modify the information provided herein, at the appropriate time.

Interrogatory 1 states:

1. (a) Identify each witness, other than an expert witness, who the Division may call in this proceeding, and provide a summary of the testimony which each such witness is expected to offer.

(b) Identify all documents upon which each such witness may rely in any way, and provide copies of any such document not already in the possession of Houston.

The Department, based upon its present belief and the information presently in its possession, supplies the following supplemental information regarding interrogatory 1.

1. (a) The following individuals may testify for the Department in the above captioned proceedings, by subpoena or otherwise, regarding, among other things, their electric utility systems, their present and potential bulk power suppliers, utility customers, the competitive situation with respect to electric power and energy both inside and outside the State of Texas, the effect of the applicants' general operations policies on the planning and operation of their systems, and the applicants' policy against intrastate operations:

John M. Ammons
Tri-County Electric Cooperative
600 N.W. Parkway
Azle, Texas 76020

North Bardell
City Manager
City of College Station
P.O. Box 9960
1101 Texas Avenue
College Station, Texas 77840

Lorence Bravenec
Mayor
City of College Station
P.O. Box 9960
1101 Texas Avenue
College Station, Texas 77840

John H. Butts
Deep East Electric Cooperative, Inc.
U.S. Highway 21 East
P.O. Drawer N
San Augustine, Texas 75972

Durwood Chalker
Central Power & Light Company
P.O. Box 2121
Corpus Christi, Texas 78403

Paul H. Meyers
Attorney at Law
109 North Main Street
Electra, Texas 76360

John R. Milford
City Administrator
City of Seymour
P.O. Box 31
Seymour, Texas 76380

Alfred E. Naylor
Gulf States Utilities Co.
285 Libery Avenue
Beaumont, Texas 77701

Juan D. Nichols
Wood County Electric Cooperative
501 South Main
P.O. Box 398
Quitman, Texas 75783

Sam Phelps
City Manager
City of Vernon
Box 1423
Vernon, Texas 76384

Gene R. Harrison
City Manager
City of Hondo
1600 Avenue M
Hondo, Texas 78861

Alton Higginbotham
Lighthouse Electric Cooperative, Inc.
201 West California Street
P.O. Box 580
Floydada, Texas 79235

J. L. Johns
Upshur-Rural Electric Cooperative Corporation
1200 W. Tyler
P.O. Box 70
Gilmer, Texas 75644

R. E. Lee
The Carter Oil Company
Dresser Tower
Louisiana & Smith Streets
Houston, Texas 77001

Harold J. Marsh
Electra Hospital
South Highway 25
Electra, Texas 76360

J. R. Phillips
The Carter Oil Company
Dresser Tower
Louisiana & Smith Streets
Houston, Texas 77001

J. P. Racz
The Carter Oil Company
Dresser Tower
Louisiana & Smith Streets
Houston, Texas 77001

Ross Segrest
1521 Lake Air Drive
Suite 118
Waco, Texas 76710

H. Eldridge Striedel
Sam Houston Electric Cooperative, Inc.
Highway 190 East
P.O. Box 1121
Livingston, Texas 77351

Douglas Wright
1759 South Quincy
Tulsa, Oklahoma 74120

Maurice F. Hebb, Jr.
Vice President
Florida Power Corp.
3201 34th Street South
P.O. Box 14042
St. Petersburg, Fla. 33733

1534 227

R. A. Yarbrough
1311 Avenue J., N.W.
Childress, Texas 79201
(Mailing Address)
P.O. Box 764
Childress, Texas 79201

In addition to the above-named individuals, the Department specifically reserves the right to call as a witness for the Department any of the individuals whose depositions have been noticed in these proceedings or in connection with West Texas Utilities Co. v. Texas Electric Service Co., 470 F. Supp. 798 (N.D. Tex. 1979), appeal pending, for the purpose of testifying and/or identifying documents. The Department also reserves the right to call any individual needed to identify documents for the purpose of introducing documents at the hearing. Furthermore, because of ongoing discovery and investigation, the Department may decide to delete the names of some of the individuals designated on this list or add other persons to this list. Houston Lighting and Power ("HL&P") will be notified at the earliest possible time of any such additions and/or deletions.

(b) The Department is providing and making available for inspection various documents which some of the above-named potential witnesses may use in conjunction with their testimony. The Department does not know, at this time, however, which of these documents, if any, may be relied upon by these potential witnesses.

The Department has attached to this Supplementary Interrogatory Response, the following documents: Exhibit 1 which contains documents which Mr. Meyers and Mr. Marsh may

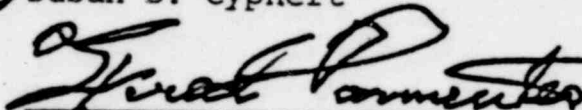
1534 228

rely upon in their testimony; Exhibit 2 which contains documents which Mr. Phelps may rely upon in his testimony; and Exhibit 3 which contains documents which Mr. Milford may rely upon in his testimony. The documents upon which Mr. Segrest may rely are voluminous. Within a reasonable time after receiving notice, the Department will make these documents available for any of the parties to these proceedings for inspection at the Department's offices.

Based on the information presently in the Department's possession, the supplemental information provided herein is, to the best of the Department's present belief and knowledge, true and correct.

Respectfully submitted,

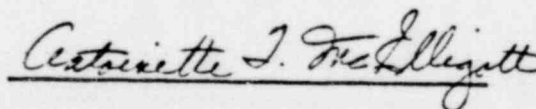

Susan B. Cyphert


Frederick H. Parmenter

Attorneys, Energy Section
Antitrust Division
U.S. Department of Justice
(Telephone: 202-724-6667)

Washington, D.C.
November 27, 1979

Subscribed and sworn to before me, a notary public, this
27th day of November, 1979.



Dated: November 27, 1979

Washington, D.C.

My Commission Expires January 1, 1981

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-445A
50-446A

1534 230

Jerome Saltzman
Chief, Antitrust and
Indemnity Group
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Roff Hardy
Chairman and Chief Executive
Officer
Central Power and Light
Company
P.O. Box 2121
Corpus Christi, Texas 78403

G. K. Spruce, General Manager
City Public Service Board
P.O. Box 1771
San Antonio, Texas 78203

Perry G. Brittain
President
Texas Utilities Generating
Company
2001 Bryan Tower
Dallas, Texas 75201

R. L. Hancock, Director
City of Austin Electric
Utility Department
P. O. Box 1088
Austin, Texas 78767

G. W. Oprea, Jr.
Executive Vice President
Houston Lighting & Power
Company
P. O. Box 1700
Houston, Texas 77001

Jon C. Wood, Esquire
W. Roger Wilson, Esquire
Matthews, Nowlin, Macfarlane
& Barrett
1500 Alamo National Building
San Antonio, Texas 78204

Joseph Gallo, Esquire
Richard D. Cudahy, Esquire
Robert H. Loeffler, Esquire
Isham, Lincoln & Beale
Suite 701
1050 17th Street, N.W.
Washington, D.C. 20036

Michael I. Miller, Esquire
David M. Stahl, Esquire
Thomas G. Ryan, Esquire
Martha E. Gibbs, Esquire
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

Roy P. Lessy, Esquire
Michael Blume, Esquire
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Jerry L. Harris, Esquire
City Attorney
Richard C. Balough, Esquire
Assistant City Attorney
City of Austin
P.O. Box 1088
Austin, Texas 78767

Robert C. McDiarmid, Esquire
Robert A. Jablon, Esquire
Spiegel and McDiarmid
2600 Virginia Avenue, N.W.
Washington, D.C. 20036

Dan H. Davidson
City Manager
City of Austin
P.O. Box 1088
Austin, Texas 78767

Don R. Butler, Esquire
1225 Southwest Tower
Austin, Texas 78701

Joseph Irion Worsham, Esquire
Merlyn D. Sampels, Esquire
Spencer C. Relyea, Esquire
Worsham, Forsythe & Sampels
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

Joseph Knotts, Esquire
Nicholas S. Reynolds, Esquire
Debevoise & Liberman
1200 17th Street, N.W.
Washington, D.C. 20036

Douglas F. John, Esquire
Akin, Gump, Hauer & Feld
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036

Morgan Hunter, Esquire
McGinnis, Lochridge & Kilgore
5th Floor, Texas State Bank
Building
900 Congress Avenue
Austin, Texas 78701

Jay M. Galt, Esquire
Looney, Nichols, Johnson
& Hayes
219 Couch Drive
Oklahoma City, Okla. 73101

Knoland J. Plucknett
Executive Director
Committee on Power for the
Southwest, Inc.
5541 East Skelly Drive
Tulsa, Oklahoma 74135

John W. Davidson, Esquire
Sawtelle, Goode, Davidson
& Tioilo
1100 San Antonio Savings
Building
San Antonio, Texas 78205

W. S. Robson
General Manager
South Texas Electric
Cooperative, Inc.
Route 6, Building 102
Victoria Regional Airport
Victoria, Texas 77901

Robert M. Rader, Esquire
Conner, Moore & Crober
1747 Pennsylvania Ave., N.W.
Washington, D.C. 20006

W. N. Woolsey, Esquire
Dyer and Redford
1030 Petroleum Tower
Corpus Christi, Texas 78474

R. Gordon Gooch, Esquire
John P. Mathis, Esquire
Baker & Botts
1701 Pa. Avenue, N.W.
Washington, D.C. 20006

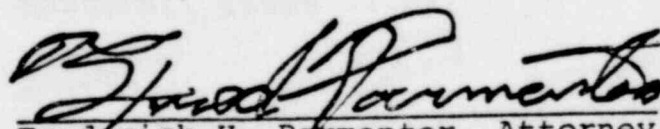
Robert Lowenstein, Esquire
J. A. Bouknight, Esquire
William J. Franklin, Esquire
Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Ave., N.W.
Washington, D.C. 20036

E. W. Barnett, Esquire
Charles G. Thrash, Jr., Esquire
J. Gregory Copeland, Esquire
Theodore F. Weiss, Jr., Esquire
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

Kevin B. Pratt, Esquire
Assistant Attorney General
P.O. Box 12548
Capital Station
Austin, Texas 78711

Frederick H. Ritts, Esquire
Law Offices of Northcutt Ely
Watergate 600 Building
Washington, D.C. 20037

Donald M. Clements, Esquire
Gulf States Utilities Company
P.O. Box 2951
Beaumont, Texas 77704


Frederick H. Parmenter, Attorney
Energy Section
Antitrust Division
Department of Justice

1534 232