

December 21, 1979

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	\$	
	\$	
HOUSTON LIGHTING & POWER COMPANY	\$	Docket No. 50-466
	\$	
(Allens Creek Nuclear Generating	\$	
Station, Unit 1)	\$	

APPLICANT'S RESPONSE TO TEX PIRG'S
SIXTH SET OF INTERROGATORIES TO
HOUSTON LIGHTING & POWER COMPANY

In response to the interrogatories propounded by
TexPirg, Houston Lighting & Power Company ("Applicant")
answers as follows:

INTERROGATORY NO. 1(a): In earlier responses, HL&P stated
that the Dow power plant was the predecessor of the Limestone
Lignite Plant. What was the MWe rating of the proposed Dow
venture? Was power from the proposed Dow venture included
in the installed capacity projections on either Table
S1.1-3 of ER Supp., App. SH, p. SH-100 of the Environmental
Report, or Tables S.8.13 and S.8.14 of the FS-Final Environ-
mental Statement?

ANSWER:

1.a. The MWe rating of each unit of the proposed 2-unit
plant was 750 MW. Under the proposed venture, HL&P was to
receive 50% of each unit. HL&P's share of each of the two
units was included in all three of the tables referenced in
the request.

INTERROGATORY NO. 1(b): Has HL&P revised demand projections
for the time period in which ACNGS is expected to come on-line
since the publication of the FS-Final Environmental Statement?
If so, what is the new peak demand projection for the relevant
years? Is that an upward or downward revision?

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ANSWER:

1.b. HL&P has revised demand projection since the publication of the FS-Final Environmental Statement. The new peak demand projection for the relevant years is as follows:

<u>Year</u>	<u>Demand Projection (MW)</u>
1985	12425
1986	12900
1987	13325

The revision was downward.

INTERROGATORY NO. 1(c): Is the Limestone Lignite Plant a response, in any way, to revised peak demand projections? To what extent have any revised demand projections affected the Limestone facility?

ANSWER:

1.c. The decision to construct the Limestone Lignite Plant was not in any way a response to revised peak demand projections and to no extent did revised demand projections affect the facility.

INTERROGATORY NO. 1(d): Would HL&P build both ACNGS and the Limestone facility within the presently similar time frames if the company decided to maintain its present reserve margin level each year rather than increase the reserve margin? Is the Limestone Power Plant decision a result of the determination by HL&P management that the reserve margin be increased above 20% in the next decade?

ANSWER:

1.d. HL&P's current plans contemplate the construction of the Limestone Plant for commercial operation of Units 1 and 2 in 1985 and 1986, respectively, and the commercial operation of ACNGS in 1987. The consideration of increasing the reserve margin to a level greater than the present 15% criterion is not impacted by nor does it impact the decision to construct the Limestone facility. There has been no determination that the reserve margin should be increased above 20% in the next decade; hence, the Limestone decision was not related to such considerations.

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INTERROGATORY NO. 2: With regard to HL&P's peak load forecast for the next ten years, provide the following for the linear analysis involved with each rate class:

- (a) R^2 for each independent variable.
- (b) t-statistic (or other measure of significance level).
- (c) Percent unexplained variance.
- (d) Durbin-Watson statistic.

Please give the number of degrees of freedom where applicable for each statistic.

ANSWER:

2. Pages SH-72 through SH-82 of the ER Supplement contain the model and assumptions used to forecast the demand projections shown in Chapter 1 of the ER Supplement.

INTERROGATORY NO. 3: With regard to HL&P's load forecast, what differences in price elasticity are assumed for each rate class (residential, commercial, and industrial)?

ANSWER:

3. See answer to Interrogatory No. 2.

Respectfully submitted,

C. Thomas Biddle Jr.

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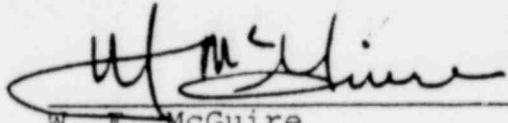
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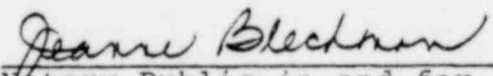
STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared W. F. McGuire, who upon his oath stated that he has answered the foregoing Houston Lighting & Power Company's Response to TexPirg's Sixth Set of Interrogatories in his capacity as Principal Engineer of the Environmental Protection Department for Houston Lighting & Power Company, and all statements contained therein are true and correct to the best of his knowledge and belief.



W. F. McGuire

SUBSCRIBED AND SWORN TO BEFORE ME by the said
W. F. McGuire, on this 21st day of December, 1979.



Notary Public in and for
Harris County, Texas

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to TexPirg's Sixth Set of Interrogatories to Houston Lighting & Power Company in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 21st day of December, 1979.

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