

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	\$	
	\$	
HOUSTON LIGHTING & POWER	\$	
COMPANY, THE CITY OF SAN	\$	NRC DOCKET NOS. 50-498A
ANONIO, THE CITY OF	\$	50-499A
AUSTIN, and CENTRAL POWER	\$	
AND LIGHT COMPANY	\$	
(South Texas Project	\$	
Unit Nos. 1 and 2)	\$	

TEXAS UTILITIES	\$	
GENERATING COMPANY,	\$	
ET AL	\$	NRC DOCKET NOS. 50-445A
(Comanche Peak Steam	\$	<u>50-446A</u>
Electric Station,	\$	
Unit Nos. 1 and 2)	\$	

HOUSTON LIGHTING & POWER COMPANY'S
ADDITIONAL ANSWERS TO
THE NRC STAFF'S INITIAL INTERROGATORIES TO
HOUSTON LIGHTING & POWER COMPANY

On January 15, 1979, the NRC Staff ("Staff") filed its Initial Interrogatories and Request for Production of Documents ("Initial Interrogatories") to Houston Lighting & Power Company ("Houston"). Houston filed its answers to the Staff's Initial Interrogatories on February 20, 1979, and thereafter on March 23, 1979, the Staff filed its Response to Motion for Protective Order and Motion to Compel Further Answers ("Motion") directed toward Houston. On April 12, 1979, Houston filed its Response to the NRC

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Staff's Response to Motion for Protective Order and Motion to Compel Further Answers ("Response"), in which Houston volunteered to provide additional answers to certain of the Staff's Initial Interrogatories, as clarified or qualified by the language in the Staff's Motion of March 23, 1979. Houston therefore files these Additional Answers to the Staff's Initial Interrogatories.

As requested by the Staff, Houston is reproducing the original Initial Interrogatory before its Additional Answers. Houston is also reproducing the relevant portions of the Staff's Motion of March 23, 1979, that clarify or qualify the Initial Interrogatory before the Additional Answer to which it is responsive.

Interrogatory No. 1(g)

Initial Interrogatory

1(a). List all consultants and/or expert witnesses (in-house or otherwise) who may be used in the captioned NRC proceeding.

. . . .

(g). For each consultant and/or expert witness listed in (a), list each person or entity contacted by the consultant or expert in the course of his duties (i) for the NRC proceeding, (ii) the District Court (Dallas) antitrust proceeding, and (iii) the Texas PUC proceeding.

(Exclude support personnel, clerical personnel, the attorneys of record for HL&P and/or TU.)

Staff's Motion

It is unclear whether Houston is responding that Mr. Gerber has not contacted any persons or entities since July of 1977 or whether it objects to producing this information. If the answer is that Mr. Gerber has not had any contacts since July of 1977, HL&P should be ordered to say so. If Mr. Gerber has had such contacts, Staff respectfully requests that the Board overrule Houston's objection that this Interrogatory calls for information beyond that required by Rule 705 of the Federal Rules of Evidence on the ground argued above, and compel Houston to list those persons and parties with which Mr. Gerber has had contact.

Additional Answer

Mr. Gerber has not had contact with any person or entity since July of 1977 upon which contact he relied in forming his expert opinions.

Interrogatory No. 2(d)

Initial Interrogatory

2(a). List and explain in detail all benefits, actual or perceived, which HL&P/TU consider pertinent to, and/or relate to the decision, policy or preference to remain in intrastate commerce.

. . . .

(d). Provide all documents directly addressing the substance of this interrogatory.

Staff's Motion

Houston answers in response to 2(c)--"none". Staff finds it inconceivable, that Houston, which has argued repeatedly that it has fully studied the benefits and detriments of interstate commerce, should have no documents which address the benefits and detriments of interstate interconnections. Staff respectfully requests this Board to order Houston to search its files again and produce those documents addressing the subject.

Additional Answer

In its motion the Staff has completely changed the question. The answer to the original question was and is none. The Staff now seeks documents relating to interstate interconnections. Houston will produce or index all documents relating to engineering and/or commercial benefits and/or detriments of direct or indirect interstate interconnections. See also the documents identified in response to CP&L Interrogatory Nos. 4, 6 in the District Court case.

Interrogatory No. 8(c)

Initial Interrogatory

8(c). Does TU/HL&P contend that interconnection

532 024

with interstate utility entities can be of no assistance in terms of offering greater flexibility to alleviate capacity shortages and excesses. Explain in detail.

Staff's Motion

Houston's answer is clearly insufficient. Staff asked in 8(c) what potential benefits there might be to interstate operations for Houston in the form, e.g., of "offering greater flexibility to alleviate capacity shortages and excesses." It did not ask for Houston's conclusion as to the merits or demerits of interstate operation. . . .

Additional Answer

Houston agrees that theoretically there are benefits to electric utilities from interconnections with other electric utilities, at least up to a point. Some of those theoretical benefits are reserve sharing and power exchanges. However, ERCOT includes utilities with generating capacity of 30,000 Mw, and these benefits are already available to Houston within ERCOT. Houston would evaluate further interconnections by considering whether any incremental benefits are available and then by weighing such incremental benefits against the cost and reliability detriments associated with the particular interconnection scheme under consideration. In its supplemental answer to Interrogatory No. 1 of the Department of Justice's

first interrogatories to HL&P, Houston explained the kind of studies which must be done in order to address this question.

Interrogatory No. 10(a)-(c)

Initial Interrogatory

10(a). Does HL&P/TU contend that ERCOT is presently an "optimal" size?

(b). Does HL&P/TU contend that ERCOT will in the future be an "optimal" size?

(c). If the answer to either subparts (a) or (b) above is "yes," then explain in detail the basis for such contentions.

Staff's Motion

Staff objects to Houston's reference in 10(a)-(c) to testimony (attached as Appendix B) which is unresponsive to the Staff's interrogatory. Mr. Simmons' cited testimony concerned the manageability of ERCOT in emergencies. Though "optimality" includes manageability, it also includes economic and other considerations. As to these, Mr. Simmons said nothing. . . .

Additional Answer

Although it is impossible to establish one "optimal size" for interconnected utilities, Houston believes that ERCOT is presently in the range of an "optimal" size, in that ERCOT is large enough to utilize the largest

generators that the state of the art has produced, and ERCOT is large enough to achieve the benefits of coordination, such as economies of scale, without the detriments associated with the large eastern interconnected system. Houston is not aware of any projected advance in the state of the art that will change this answer in the foreseeable future. In terms of manageability, Houston believes that ERCOT is a manageable size for planning and management and will continue to be so in the future, particularly when compared to other interconnected systems in the United States.

Interrogatory No. 11

Initial Interrogatory

11(a). In what parts of its service area is HL&P/TU experiencing the greatest load growth? ("Parts" refers to geographic locations or portions of service areas.)

(b). List any other electric utilities which have transmission or distribution planned or in place in these areas.

(c). List any entities which have challenged HL&P/TU's right to serve these areas of rapid load growth.

Staff's Motion

Houston's answer is completely unresponsive to the Staff's interrogatory. The question was which geographic

parts of Houston's service area are experiencing the greatest load growth. Whether Houston's service area is compact or not, there are communities within that service area which may be growing at a faster rate than others. Staff asked Houston to list those communities in descending order of load growth. Additionally, in each community there may be different electric utility entities with facilities adjacent to HL&P's. Staff would ask Houston to list the electric utility entities for each of those respective communities.

Additional Answer

(a) Houston's records do not contain sufficient information to allow Houston to list the communities within its service area in descending order of load growth. Load growth in Houston's service area has been more or less uniform, although not identical in nature. For example, commercial load growth has been greatest within the city limits of Houston, Texas. Most of HL&P's industrial load growth occurs in the Bayport, Greens Bayou and Houston Ship Channel areas. The greatest residential load growth is occurring in the north and west parts of Houston's service area.

(b) Electric utilities in Texas may serve only customers within their certified service areas. Thus, the only electric utilities with transmission or distribution

332 020

planned or in place in Houston's service area would be utilities that shared dually certified areas with Houston. Less than 1% of Houston's entire service area is dually certified, and none of the dually certified areas are in the higher growth areas identified above.

(c) No entity has challenged Houston's right to serve within its service area.

Interrogatory No. 13(a)

Initial Interrogatory

13(a). Does the study performed by Stagg Systems [hereinafter referred to as the "Stagg Study"] for HL&P constitute a commitment by HL&P to share its lowest cost fuels with other systems under central economy dispatch? Explain in detail. (Houston and TU answer required.)

Staff's Motion

Staff objects to Houston's reference to testimony (attached in "Appendix C") which is unresponsive to Staff's interrogatory. Mr. Simmons in that testimony spoke of increased coordination, not the sharing of lowest cost fuels. . . .

Additional Answer

As represented by the Stagg Study, Houston supports increased coordination and exchanges of power among the utilities in ERCOT in the future, including the concept of central economy dispatch where feasible. In fact,

332 029

Houston has formally suggested to the Texas PUC that a study of central dispatch within ERCOT be undertaken. (See HL&P's Exhibit 206 in the District Court case.) Once the study is completed the next step toward implementation of central dispatch will no doubt involve contract negotiations, with ultimate approval by the PUC being the final step.

Interrogatory No. 15

Initial Interrogatory

15(a). List those transactions since 1965 in which TU/HL&P has provided third-party wheeling for other entities.

(b). List those occasions on which HL&P/TU has been asked orally or in writing, to provide third-party wheeling.

(c). List and explain in detail those occasions on which HL&P/TU has orally or in writing declined or otherwise not been able to wheel for others.

(d). Supply all documents which relate to subparts (b) and (c) of this interrogatory.

Staff's Motion

Houston's answer to the interrogatory is incomplete. Staff cites the deposition testimony of Paul R. Cunningham, an official of TMPP, of July 1, 1977, at 13, in West Texas Utilities Co. v. Texas Electric Service Co.,

in which Mr. Cunningham states that he met with Mr. D. E. Simmons (of Houston) on or about June 15, 1971, to discuss interconnection and wheeling. A complete response to this interrogatory by Houston should refer to these discussions if they did in fact occur. Staff respectfully asks this Board to compel Houston to provide such documents, and to describe and "explain in detail" its negotiations with TMPP regarding wheeling and interconnections.

Additional Answer

Mr. Cunningham (of TMPA) did discuss with Mr. Simmons (of HL&P) the possibility of connecting the future TMPA's Gibbons Creek Power Plant to the HL&P-TPL interconnecting line. There was no discussion then or since about wheeling.

Interrogatory Nos. 16 and 17

Initial Interrogatories

16(a). State the amounts (in MW) of installed generation reserves required to meet HL&P/TU's planning criteria for each year from 1970-1978.

(b). State the amounts (in MW) of actual installed generation reserves on HL&P/TU's system for each of the years since 1970.

(c). Specify and explain the arrangements which were entered into to dispose of any excess.

(d). Quantify the amount of undisposed excess for each of the years since 1970.

17(a). Detail the arrangements which TU/HL&P have entered into to dispose of any excess capacity for each of the years from 1978 until 1987.

(b). Quantify the expected amount of undisposed excess capacity for each of the years from 1978 until 1987.

Staff's Motion

HL&P's answers are unresponsive to Staff's interrogatories. The question asked what amount of generation would be required if Houston were to meet its planning criteria, and the "excess" according to Houston's criteria. Houston should at a minimum be compelled to answer this question with the amounts of generation required to meet with planning criteria. Staff posits the same comments regarding HL&P's answer to Staff's Interrogatory No. 17--Houston should be ordered to detail its excess capacity in terms of its planning criteria.

Additional Answer

For the period from 1960 through 1976, Houston sought to maintain a reserve generating capacity margin of at least 15%. In 1977, Houston followed a policy of maintaining at least a 12% reserve margin. As of 1978, Houston has sought to maintain a 15% reserve margin.

Houston plans generation so that its planned reserves exceed the margin, but Houston does not have an upper limit on the reserves that it plans. Thus, Houston does not consider that it has had or can expect excess generation reserves above its planning criteria. Also, Houston has not made and does not now contemplate making any arrangements to dispose of any generating capacity.

The amount of reserve margin actually maintained during the years 1960 through 1976 is:

<u>Year</u>	<u>% Reserve*</u>
1960	37.30
1961	53.50
1962	28.50
1963	19.40
1964	8.14
1965	11.12
1966	15.58
1967	17.30
1968	22.91
1969	18.69
1970	10.03
1971	19.16
1972	22.71
1973	18.88
1974	26.41
1975	31.40
1976	22.30
1977	17.60
1978	18.00

* Does not include interruptible demand.

Interrogatory No. 20(a)

Initial Interrogatory

20(a). Regarding the 1968 interconnection study performed by TU, Gulf States Utilities, and HL&P, list

332 033

the individuals who participated, their company affiliations, titles, and responsibilities in producing this study.

Staff's Motion

Houston's answer is incomplete in that it does not, as requested, list the "responsibilities" of each designated individual "in producing this study."

Additional Answer

Houston is not aware of any particular responsibilities that the participants had, other than to represent their respective utilities in the study.

Interrogatory No. 23(a)

Initial Interrogatory

23(a). Explain in detail the basis for HL&P's assertion in the Texas PUC's Docket # 14 proceeding that interconnection of SWPP and ERCOT would cost Texas consumers \$1 billion.

Staff's Motion

Staff objects to Houston's reference to testimony in other proceedings without page references, and to undesignated exhibits. . . . Houston should be directed to directly respond to this interrogatory.

Additional Answer

Houston estimated the cost to Houston of an interconnection between ERCOT and SWPP based on the

following assumptions: Houston is now approximately one-third the size of ERCOT, so that during an emergency, about 35% of a generation loss would be made up by Houston on its own system and about 65% of the loss would come from other ERCOT systems and feed over Houston's lines. If ERCOT and SWPP were interconnected, Houston's generation would be less than 5% of the system, and thus about 95% of any generation loss to Houston would flow over interconnected lines to Houston. The interconnection with SWPP would cause an increase of 50% in the flows on the interconnected lines to Houston, thus causing Houston's bulk power system to be utilized 50% more, which would require Houston to provide on a continuous basis 50% more transmission capacity in order to maintain the levels of transmission reliability and flexibility in use as now exists on Houston's system. Furthermore, even if such transmission capacity were to be installed, reliability of ERCOT would be degraded if ERCOT and SWPP were interconnected as suggested in Mode 4 because of the loss of the benefits of governing action now being achieved within ERCOT.

The replacement costs in 1976 dollars for the 345 Kv circuits in Houston's service in 1986 is \$179,000,000; and the cost of providing a 50% increase in this capacity would be \$90,000,000 in 1976 dollars. This volume escalated

annually represents about \$180,000,000 in 1986 dollars. Estimating the cost of the TU companies of providing a similar 50% increase in capacity in 1986, and combining that with Houston's outlay yields \$400,000,000. To develop this figure to the year 1996, it is logical to predict a needed increase in the transmission systems of the same order of magnitude as the system load growth, or 35%. Applying this to the \$400,000,000 costs in 1986 yields a cost of \$540,000,000 in 1986 dollars which escalated to 7% gives a figure of \$1,080,000,000 in 1996.

Thus, by the year 1996, the costs of augmenting Houston's and TU's transmission systems due to a Mode 4 interconnection could be as much as \$1 billion.

Mr. Simmons is among those who have knowledge of this analysis.

Interrogatory No. 26

Initial Interrogatory

State the "equivalent forced outage rates" as defined by the EEI Prime Movers Committee currently used by HL&P/TU for planning purposes by estimated size of units for:

- a. nuclear power plants beginning with Comanche Peak and South Texas, and continuing to future planned units on long-range projections.

- b. lignite plants.
- c. coal plants.
- d. gas plants.

Staff's Motion

Houston answers Staff's Interrogatory No. 26 with tables which do not, as requested, distinguish between coal and lignite. It should do so.

Additional Answer

The outage rates used for coal and lignite units were the same.

Interrogatory No. 32(a)

Initial Interrogatory

32(a). Does HL&P/TU contend that it had no knowledge that CSW and/or its subsidiaries contemplated the integration of the CSW system prior to 1974? Explain in detail.

Staff's Motion

Houston's answer is unresponsive to Staff's interrogatory. The question is whether Houston knew of Central's contemplation to integrate its subsidiaries, not simply what Central's officers allegedly told others.

Additional Answer

Houston has no way of knowing what CSW contemplates. Houston does know that in 1945 CSW represented

to the SEC that it was going to interconnect its four operating companies, but this was never done. Furthermore, Houston believes that CSW would not interconnect its four companies as of now if it could solve its legal problems at the SEC without doing so, because the interconnection it is proposing is far less economical for its subsidiaries than increased coordination within ERCOT and SWPP.

Interrogatory No. 33(b)

Initial Interrogatory

33(b). Does HL&P/TU contend that there are no opportunities for bilateral exchanges and/or coordinated service between any intrastate-ERCOT entities in any interstate entities. Explain.

Staff's Motion

Staff contends that Interrogatory 33(b) is neither unduly hypothetical nor argumentative. Staff merely asked whether Houston, by adhering to its preference for an intrastate TIS, contends that there are no opportunities for transactions over interstate interconnections between ERCOT and non-ERCOT entities.

Additional Answer

To the extent that this Interrogatory asks whether there are "opportunities for transactions over

interstate interconnections between ERCOT and non-ERCOT entities," Houston believes that theoretically the answer is yes, because any two interconnected utilities may have transactions over their interconnections if there is a reason. If by "opportunities for transactions" the Staff is inquiring about anything more than the theoretical possibility, Houston itself is not contemplating transactions with non-ERCOT utilities and does not have sufficient knowledge to answer for other ERCOT utilities. Houston believes that opportunities for bilateral exchanges and/or coordinated services are as readily available within ERCOT as outside of it.

Interrogatory No. 49

Initial Interrogatory

49(a). Does HL&P/TU employ any different system design criteria for developing bulk transmission and generation than is required by TIS?

(b). If so, please explain such different criteria.

Staff's Motion

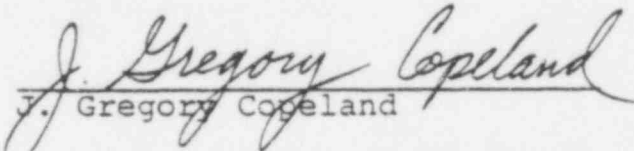
Houston's answer is unresponsive to Staff's request for a listing and explanation of the differences between TIS and HL&P system design criteria. Houston indicates that there are frequent differences, but fails

to explain those differences. It should be ordered to do so.

Additional Answer

Houston plans its transmission and generation to meet TIS' criteria. Houston's planning engineers have authority, within budget limits, to apply more stringent requirements for individual transmission lines when so required in their judgment. No formal criteria exist for applying more stringent criteria.

Respectfully submitted,


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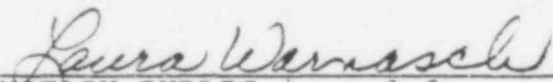
332 040

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared D. E. SIMMONS, who upon his oath stated that he has answered the foregoing Houston Lighting & Power Company's Additional Answers to the NRC Staff's Initial Interrogatories in his capacity as Vice President of Corporate Planning for Houston Lighting & Power Company, and all statements contained therein are true and correct.


D. E. SIMMONS

SUBSCRIBED AND SWORN TO BEFORE ME by the said D. E. Simmons, on this 24th day of May, 1979.


NOTARY PUBLIC in and for
Harris County, T E X A S

332 041

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of: §
§
HOUSTON LIGHTING & POWER § NRC DOCKET NOS. 50-498A
COMPANY, ET AL § 50-499A
(South Texas Project, §
Unit Nos. 1 and 2) §

In the Matter of: §
§
TEXAS UTILITIES § NRC DOCKET NOS. 50-445A
GENERATING COMPANY, ET AL § 50-446A
(Comanche Peak Steam §
Electric Station, §
Unit Nos. 1 and 2) §

AFFIRMATION OF SERVICE

This is to certify that a true and correct copy
of the foregoing instrument has been served upon all counsel
and persons listed on the attached Service List on this the
24th day of May, 1979.

J. Gregory Copeland
J. Gregory Copeland

332 042

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332 043

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332 044

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Page 3

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332 045

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332 040

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332 047