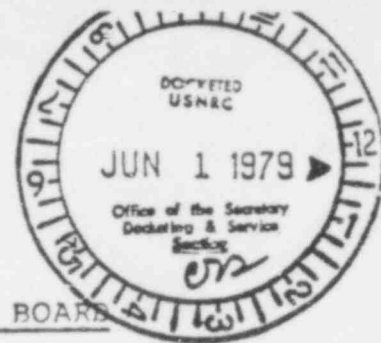


RELATED CORRESPONDENCE

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD



In the Matter of)

PUGET SOUND POWER & LIGHT)
COMPANY, et al.,)

DOCKET NOS. STN 50-522
50-523

(Skagit Nuclear Power Project,)
Units 1 and 2))
_____)

INTERVENOR SCANP'S INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO PORTLAND GENERAL ELECTRIC COMPANY DATED
MAY 30, 1979

In accordance with 10 CFR, §2.740B and 10 CFR §2.741,
please answer the following Interrogatories and respond to
the accompanying Requests for Production.

Documents to be produced should be presented at the
offices of undersigned counsel at 9:00 a.m. June 29, 1979,
or at such other time and place as may be agreed upon.

INTERROGATORY NO. 1. With respect to your prospectus
dated February 27, 1979 for an issue of common stock, please
describe "Trojan's incremental costs", referred to on page
5.

ANSWER:

360 049

INTERROGATORY NO. 2. With respect to such prospectus, state the effect on the company's earnings, cash position, and available capital from the denial of the rate relief sought to recover excess power costs due to the Trojan shutdown.

ANSWER:

INTERROGATORY NO. 3. With respect to such prospectus, please describe the company's "present plans for joint ownership of certain future generating facilities", and specifically identify the generating facilities referred to (see page 6).

ANSWER:

INTERROGATORY NO. 4. When does the company anticipate it will be able, under its articles of incorporation, to issue additional shares of preferred stock?

ANSWER:

INTERROGATORY NO. 5. Is the company able to state, in view of results thus far during 1979, when it will be in the position to issue additional first mortgage bonds?

ANSWER:

INTERROGATORY NO. 6. What future rate relief does the company anticipate it will need, annually, through the year 1990, in order to meet earnings coverage provisions required in its financing program?

ANSWER:

INTERROGATORY NO. 7. With respect to the statement that the company, in the absence of adequate and timely rate relief, would consider "reducing its construction program should the sale of partial interests in future generating units and/or the delay in the construction of future facilities", please identify which future generating units the company has in mind, and also identify the persons or entities who might be prospective purchasers of such partial interests. Also state which future facilities the company had in mind in referring to construction delays.

ANSWER:

360 052

INTERROGATORY NO. 8. Does the company still believe that regional power legislation will "give assurance to the Company that the cost of construction and operation of its new thermal plants would be recovered"? (See page 18). If so, please explain why, and in doing so refer to all documents which support such answer.

ANSWER:

INTERROGATORY NO. 9. Where did the company obtain the information presented in the table on page 20 of the prospectus? Please describe all documents which contain or reflect such information. Also explain the discrepancy between the estimated cost per KW set forth in your table on page 20, and such costs as presented in the most recent form 10-K filed by Puget Power.

ANSWER:

360 053

INTERROGATORY NO. 10. Please describe and identify the "agreement relating to the construction, ownership and operation of Pebble Springs Nuclear Project,... and the Skagit Nuclear Project...."

ANSWER:

INTERROGATORY NO. 11. Please give the date and author of the letter from the U.S. Geological Survey "confirming the adequacy of the Skagit Site" which is referred to at page 21 of the prospectus.

ANSWER:

360 054

INTERROGATORY NO. 12. Please identify all contracts relating to coal supply and transportation for the Boardman plant. State the cost of coal under the coal supply contract with Amax, Inc. referred to at page 24 of the prospectus, and give the most recent information regarding the transportation costs referred to at page 25 of the prospectus.

ANSWER:

INTERROGATORY NO. 13. Has PGE now or at any time in the past employed or authorized any person to engage in any of the following activities?

a) Investigation of the activities or background of individual or organizational intervenors in this proceeding.

b) Clandestine observation of the activities of the intervenors in this proceeding.

c) Payment of funds to former representative Robert Perry in connection with his services to assist with dealing with environmental groups, or any other purpose?

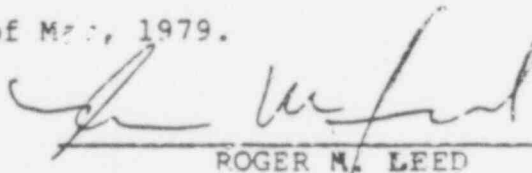
If so, please give full particulars, and identify all documents which reflect or resulted from such activities.

INTERROGATORY NO. 14. Identify all documents which set forth the terms of your bank lines of credit, and identify all banks participating in such lines of credit. Also state the condition or circumstances under which such lines of credit may be cancelled, terminated, or reviewed.

ANSWER:

REQUEST FOR PRODUCTION NO. 1. Please produce for inspection and copying all documents and other items identified in your answers to the foregoing interrogatories.

Dated this 30th day of Mar, 1979.



ROGER M. LEED