



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)	§	

THIRD SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION
OF DOCUMENTS FROM HOUSTON
LIGHTING & POWER COMPANY TO TEXPIRG

Pursuant to Section 2.7406 and 2.741 of the Commission's Rules of Practice, Houston Lighting & Power Company (Applicant) propounds this Third Set of Interrogatories and Request for Production of Documents to Texas Public Interest Research Group (TexPirg). Applicant incorporates herewith the instructions and definitions set forth in its First Set of Interrogatories and Request For Production of Documents to TexPirg.

Interrogatories

1. Referring to page 9 of Andrew Sansom's deposition dated April 16, 1979, produce the referenced document on energy conservation in the residential sector authored by the Office of Technology Assessment.

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2. Referring to page 14 of the Sansom deposition, produce the study on policy options for energy conservation authored by the Environmental Policy Center.

3. Identify each commercial concern and residential client Andrew Sansom has provided with energy conservation consultation in the last eighteen months and briefly summarize the engineering and management techniques prescribed for each.

4. State whether TexPirg has performed or relied upon any studies other than Applicant's Environmental Report and Staff's Environmental Statement, and all supplements thereto, which support the allegation that energy conservation has not been adequately considered as an alternative to the proposed facility, and the sub-allegations thereto, and produce any such studies.

5. If the answer to the preceding question is negative, state the facts upon which TexPirg will rely in supporting the contention that energy conservation has not been adequately considered as an alternative to the proposed facility, and each sub-allegation thereto, and produce all documents relating to your answer.

6. Identify the section(s) and page(s) in the Environmental Report and Environmental Statement (and Supplements) which TexPirg relies on in forming its determination that energy conservation has not been adequately considered.

7. With respect to the six examples of "conservation retrofits" in TexPirg's Contention 7.a., state how TexPirg believes:

- a. the Applicant could make these investments, including the plan and authorization from every cognizant governmental entity (local, state, and federal) for recouping any and all expenditures;
- b. the Applicant should select customers to receive these "retrofits" with particular reference to how specific retrofits can be matched with appropriate customers;
- c. the Applicant should determine whether the cost of making these investments outweighs the benefit of foregoing generation investment, including an energy generation cost saved per dollar of investment comparison for each example;
- d. these "retrofits" could become fully effective in time to displace the need for the Allens Creek project or any part of that need; and
- e. what amount of reduction, if any, in Applicant's annual peak-hour demand will result by 1987 due to the implementation of your proposed conservation retrofitting?

8. Explain how the "expenditure of funds in the range of 50 percent that proposed for ACNGS would mean that the remaining demand for electrical power could be met with solid waste combustion" Describe particularly how you arrived at the conclusion that this amount of investment will reduce projected power demand to an amount equal to a solid waste generation plant by 1987.

9. Assuming that each "retrofit" is in place by the dates you identified in the answer to 7(f) above, specify the revisions which you contend should be made in the annual and peak hour demands specified in FS-FES Table S.8.8. for the years 1985, 1986 and 1987.

10. Identify all industrial users in the Houston area which are definitely considering self-generation plans and identify the source of your knowledge.

11. Do you know the exact amount of reduction, in MWhr, if any, in Applicant's annual peak-hour demand which will result by 1987 due to TexPirg's projected increase in self-generation. Describe any studies or calculations you relied on in answering this question.

12. Identify the changes in Applicant's rate structure which TexPirg believes must be made in order to "provide an incentive for energy conservation." Explain how these changes will bring about the desired result.

13. Sub-contention 7.d. proposes the "increased use of 'passive solar' techniques. . . ."

- a. Identify every "passive solar technique" you refer to in this contention by describing what changes in present building design and landscape practices must be made for each technique; state whether the technique can be incorporated into existing structures; whether the technique is adaptable to commercial or residential uses, or both, and the estimated cost for new construction and retrofit.
- b. Specify the cost in dollars per kilowatt of silicon solar cells, if you know, and identify the source of your answer.

14. With reference to page 29 of Sansom's deposition, describe the exact scope of Mr. Sansom's testimony as it relates to TexPirg Contention 7.

15. Provide the substance of the facts and opinions and a summary of the grounds for such opinions on all matters about which Mr. Sansom is expected to testify for TexPirg.

16. Referring to pages 33 through 36 of Sansom's deposition, provide the study examining co-generation and self-generation in Applicant's service area and produce all studies and documents TexPirg and/or its expert witness will rely on.

17. Referring to pages 39 and 41 of Sansom's deposition, produce all studies and documents TexPirg and/or its expert witness will rely on in forecasting electricity demand elasticities and the correlation between rates and installation of conservation retrofits.

18. Referring to page 55 of Sansom's deposition, has TexPirg completed the calculation of the total amount of money Applicant would have to spend for conservation retrofits in order to offset the need for ACNGS? If so, provide this calculation and produce all supporting studies and documents.

19. Referring to page 76 of Sansom's deposition, provide a copy of the study on the saturation of energy conservation investment in the industrial sector and produce all supporting studies and documents.

20. Referring to page 93 of Sansom's deposition, identify the electric generation facility in St. Louis which uses methane from waste. Specifically indicate (a) the amount of waste converted per day (tons/day); (b) the amount of methane produced in conversion (Mcf/day); (c) the facility's total steam yield; (d) the facility's total thermal efficiency (waste Btu input vs. steam Btu output); (e) the facility's capacity factor; and (f) the cost per kilowatt hour of electricity generated.

21. Referring to page 97 of Sansom's deposition, provide the calculation of the average cost of passive retrofit and produce all supporting studies and documents.

22. (a) Describe in detail what would comprise the most cost-beneficial passive conservation retrofit for Houston residences and commercial buildings. (b) What would be the cost of this retrofit? (c) What percentage of the total service area customers would be able to utilize this retrofit? (d) What reduction in the annual and peak hour demands (in MWhrs) would result if all the eligible customers installed this retrofit? (e) What would be the total expenditure associated with (d) above?

23. Referring to page 101 of Sansom's deposition, produce the studies that show the average number of days during the year in Houston with substantial cloud cover.

24. Referring to page 110 of Sansom's deposition, produce the study on marginal cost pricing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Third Set of Interrogatories and Requests for Production of Documents from Houston Lighting & Power Company to TexPirg in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 5 day of July, 1979.

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