

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, THE CITY OF SAN	\$	50-499A
ANTONIO, THE CITY OF AUSTIN,	\$	
and CENTRAL POWER AND LIGHT	\$	
COMPANY	\$	
(South Texas Project, Unit	\$	
Nos. 1 and 2)	\$	
	\$	
TEXAS UTILITIES GENERATING	\$	NRC DOCKET NOS. 50-445A
COMPANY, ET AL.	\$	50-446A
(Comanche Peak Steam Electric	\$	
Station, Unit Nos. 1 and 2)	\$	

CENTRAL POWER AND LIGHT COMPANY'S  
FIRST AMENDED AND SUPPLEMENTAL ANSWERS  
TO HOUSTON LIGHTING & POWER COMPANY'S  
FIRST SET OF INTERROGATORIES

Central Power and Light Company ("CPL") hereby  
files its First Amended and Supplemental Answers to Houston  
Lighting & Power Company's First Set of Interrogatories as  
follows:

Interrogatory No. 3. The part of this Answer which  
refers to the "Industrial Power Rate" (page 3) should be  
supplemented by adding the following: "Even though the  
Industrial Power Rate is designed for customers whose load  
exceeds 600 kw, if the customer operates at a sufficiently  
high load factor, it may be to the customer's advantage to

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be served under the Industrial Power Rate, even though usage is less than 600 kw". The part of this Answer which refers to the "Small Irrigation Pumping Rate" (page 4) should be supplemented by stating that this rate was increased in 1977 as well as in 1973. The part of this Answer which refers to the two "Petroleum Service Rates" (pages 4-5) should be supplemented to clarify that these rates were instituted in 1973. The part of this Answer which refers to the "Municipal Power Rates" (page 5) should be amended to clarify that these rates are applied to "municipal customers and other customers such as privately owned water supply systems serving the general public...".

Interrogatory No. 10. The last sentence in the first full paragraph of this Answer (beginning "[m]oreover, between June and November, 1978...") should be deleted, and the following added: "In January, 1979, MEC-STEAC discontinued its purchases of firm power from CPL, and began purchasing firm power from the City Public Service Board of San Antonio because the City Public Service Board offered a lower rate. CPL was willing and able to continue selling firm power to MEC-STEAC".

Interrogatory No. 15. CPL has had discussions with representative of other CSW subsidiary companies concerning the possibility of sharing future generating units

with those companies. CPL has, from time to time, purchased hydro power and energy from Falcon Dam and Guadaloupe Blanco River Authority. CPL has also had seasonal power exchanges with CFE (Mexico) based upon diversity of load. For many years, CPL has engaged in energy exchanges with LCRA primarily to reconcile border-line loads within each other's service territory. Documents relating to the matters referred to in this answer to interrogatory are located in the offices of M. L. Borchelt, W. P. Smith, Jr., J. M. Mabe, the CPL System Planning Department, the Victoria Dispatching Office, the Rates and Regulatory Affairs Department and the Administrative Services Department, and will be made available to HLP upon request.

Interrogatory No. 20. The Answer to this Interrogatory should be supplemented by adding "Glen Chruchill" to the list of persons with knowledge on page 23.

Interrogatory No. 44. The Answer to this Interrogatory should be supplemented by adding "Larry Gawlik, John Davidson, M. I. Miller, T. G. Ryan, W. N. Woolsey, Ralph Weston, Durwood Chalker, Merle Borchelt and Chuck Orsak" to the list of persons with knowledge on page 44.

Interrogatory No. 49. The Answer to this Interrogatory should be supplemented by adding to the first full paragraph on page 52 the following: "Likewise, in the event the FERC or the NRC ordered TU and/or HLP to engage in wheeling or provide other transmission services, not all of those

transmission lines would necessarily have to be constructed. For example, a wheeling order under Sections 211 and 212 of the Federal Power Act, as amended by PURPA, would probably remove the necessity for the so-called 'contract path' between SWEPCO and CPL".

Interrogatory No. 56. Persons who CPL expects to call or present expert testimony on its behalf, and the substance of the facts and opinions to which each is expected to testify, include:

(a) A. J. Wood, who is expected to testify about the studies performed under his supervision and direction concerning the economies and reliability of operating the CSW operating companies centrally-dispatched with and without interconnections with the non-CSW ERCOT companies. Dr. Wood will also testify about the effect on CPL, in terms of cost and reliability, of CPL's loss of participation in the South Texas Project. In general, Dr. Wood will testify that his studies demonstrate that the costs of operating the four CSW subsidiaries in synchronism are less than if the four CSW subsidiaries operate in their historical pattern (e.g., CPL and WTU within ERCOT, but effectively separate from PSO and SWEP) and that this is particularly true if the CSW Texas companies (CPL and WTU) can also retain their interconnections with the other ERCOT companies, and if CPL is permitted to retain its ownership share in the STP. The

specific basis for Dr. Wood's testimony are the various production costing studies performed by PTI and the multi-area loss of load probability study conducted by PTI in late 1976 and early 1977, as well as his general knowledge and experience.

(b) F. George Arey, who is expected to testify about the results of the various load-flow and stability studies which were performed under his supervision and direction in order to determine whether the four CSW companies can be synchronously operated - and ERCOT and the SWPP can be interconnected - without causing adverse effects to electric systems in ERCOT. Generally, Mr. Arey will explain the method used to design a transmission system and testify that the system he has designed is capable of (1) providing acceptable and fully adequate service under normal conditions, and (2) withstanding one or more "contingencies" without interruption of service or other adverse effect.

(c) J. A. Bruggeman, who is expected to testify that the four CSW companies can operate at a lower cost by engaging in centralized dispatch among themselves than if they continue to operate in their historical mode, particularly if CPL and WTU can retain their interconnections with non-CSW ERCOT companies, and if CPL can retain its ownership share of the STP. Mr. Bruggeman will further testify that synchronous operation of the four CSW companies



with interconnections with non-CSW ERCOT companies will not have any adverse effect on any ERCOT company, and will not require any ERCOT company to construct any additional transmission line. The basis for Mr. Bruggeman's testimony will be the various production costing, load flow and stability studies which he has performed and in which he has participated, as well as his general knowledge and experience.

With respect to Dr. Wood, Mr. Arey and Mr. Bruggeman, see also the Answer to Interrogatory No. 47.

(d) John T. Wenders, who is expected to testify concerning the nature and extent of competition as it exists within the electric utility industry both in general and, more specifically, in Texas and the surrounding area. It is also expected that Dr. Wenders will testify about the economic impact of restrictions on the purchase, sale and other exchanges of electricity and limitations on access to various transmission services. Dr. Wenders will testify about the nature, extent and role of competition in various relevant markets within the electric utility industry as well as the general structure of the industry. He will testify about market shares and market power in the relevant markets and the conduct of various electric utilities in those markets. Also, Dr. Wenders may testify regarding the relief necessary to alleviate any actual or potential anti-competitive situation related to the licensing of the South

Texas and/or Comanche Peak plants.

The opinions expected to be expressed by Dr. Wenders will be based, at least in part, on his review of the pleadings, discovery materials and depositions in this proceeding as well as related cases and proceedings, including his testimony in the federal district court antitrust case and the information and materials reviewed in connection with that case. Dr. Wenders is also expected to rely upon his research and experience in economics, information and materials gathered in unrelated proceedings, the record in this controversy and conversations and other research into the operation of electric utilities both within and outside of Texas.

CENTRAL POWER AND LIGHT CO.

BY:



One of its Attorneys

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September 17, 1979

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STATE OF TEXAS           )  
                              )  
COUNTY OF NUECES       )     SS

V E R I F I C A T I O N

I, W. C. Price, having been duly sworn, do  
depose and say that I am a Vice-President of Central Power  
and Light Company, that I have read the foregoing Amended and  
Supplemental Answers and that the facts stated therein are  
true and correct to the best of my knowledge.

*W. C. Price*

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W. C. Price

SUBSCRIBED AND SWORN to  
before me this 17th day  
of September, 1979.

*Imelda V. Perez*     IMELDA V. PEREZ  
Notary Public

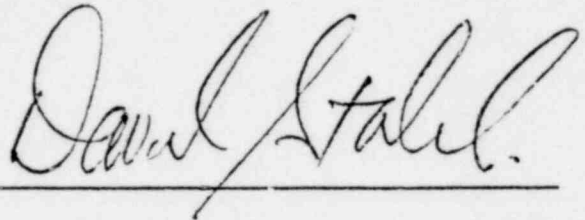
My commission expires 1-31-81.

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CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing  
CENTRAL POWER AND LIGHT COMPANY'S FIRST AMENDED AND SUPPLE-  
MENTAL ANSWERS TO HOUSTON LIGHTING & POWER COMPANY'S FIRST  
SET OF INTERROGATORIES were served upon the following persons  
by deposit in the United States mail, first-class postage  
prepaid, this 9th day of October, 1979.

  
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