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January 31, 1979

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3000 One Shell Plaza  
Houston, Texas, 77002

Re: Houston Lighting & Power Co., et al.  
(South Texas Units No. 1 & No. 2)  
NRC Docket Nos. 50-498A, 50-499A

Gentlemen:

Enclosed is a copy of the Initial Interrogatories to and First Request for Production of Documents by Houston Lighting & Power Company from the Public Utilities Board of the City of Brownsville, Texas, in Houston Lighting & Power Co., et al., (South Texas Units No. 1 & No. 2), NRC Docket Nos. 50-498A, 50-499A.

You will also find enclosed copies of interrogatories and document requests by the Public Utilities Board of the City of Brownsville, Texas to other parties in the South Texas proceeding.

In drafting these requests we have tried to take account of the production that has already occurred in this and related cases, so as to avoid duplicative requests. Should you feel that a particular request covers the same ground as one to which HL&P has previously responded, please telephone me to discuss the problem. I would also be glad to answer any other questions you may have about any part of this request.

Very truly yours,

*Marc Poirier*

Marc R. Poirier  
Attorney for the Public  
Utilities Board of the City of  
Brownsville, Texas

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Enclosures  
cc: All parties

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