

UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

In the Matter of

Houston Lighting & Power Company)	
The City of San Antonio)	
The City of Austin)	Docket Nos. 50-498
Central Power & Light Company)	and 50-499
(South Texas Project, Units)	
No. 1 & No. 2))	

INITIAL INTERROGATORIES TO AND FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS BY
THE CITY OF AUSTIN, TEXAS
FROM THE PUBLIC UTILITIES BOARD OF THE
CITY OF BROWNSVILLE, TEXAS

Pursuant to Sections 2.740, 2.740(b) and 2.741 of the Nuclear Regulatory Commission's Rules of Practice under the Atomic Energy Act, the Public Utilities Board of the City of Brownsville, Texas ("Brownsville") hereby files initial interrogatories to and requests the production of documents by the City of Austin, Texas ("Austin").

I. GENERAL INSTRUCTIONS

1. Each interrogatory should be answered separately and fully in writing under oath or affirmation by the person (or persons) making it.

2. Each document produced in response to this request should be referenced with the number(s) of the relevant request and subsection, if any. Should any of the documents requested pursuant to this set of interrogatories and requests for document production have already been made available for Brownsville's inspection, it will be sufficient to note this fact and to provide the following information: (1) document production number, if any; (2)

date, author, addressee (if any), persons receiving distribution of such document or copies thereof; (3) a description of the nature of the document; and (4) the particular request and item number in response to which the document has previously been produced.

3. Responses to interrogatories and requests for the production of documents shall be served upon the following persons:

Robert C. McDiarmid, Esquire
Robert A. Jablon, Esquire
Marc R. Poirier, Esquire
Spiegel & McDiarmid
2600 Virginia Avenue, N. W.
Washington, D. C. 20037

4. Documents should be provided by Austin as they become available, but in any event no later than 30 days after the date of this request.

5. These interrogatories and requests for documents are of a continuing nature and require supplemental answers should Austin generate or obtain further pertinent information or documents between the time its answers are filed and its documents produced and the time of the evidentiary hearing.

II. DEFINITIONS

A. "Documents" mean all writings and records of every type in the actual or constructive possession, control, or custody of Austin, its directors, officers, employees, consultants, or agents, including but not limited to contracts, memoranda, correspondence, reports, surveys, tabulations,

charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, computer printouts, vouchers, accounting statements, telegrams and telegraphic communications, engineering diagrams (including "one-line diagrams"), mechanical and electrical recordings, records of telephone communications, speeches and all other records, written, electrical, mechanical, or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody, or control of Austin, and every copy of a document which contains handwritten or other notations, or which in any other manner does not duplicate the original, or any other copy furnished pursuant to this request.

B. "Communications" shall include, without limiting the generality of its meaning, all conversations between two or more persons either in person or by telephone, all statements, speeches, declarations and comments, and shall include documents as defined in II.A. above.

C. "Person" shall mean any natural person, company, association, firm, corporation, cooperative, rural electric cooperative, municipality, joint stock association, or any political subdivision, agency or instrumentality of the federal, state, or municipal governments, or a lawful association of any of the foregoing, or any entity that produces, generates, transmits, distributes, purchases, sells, or furnishes electricity.

D. "Identify," when used with respect to documents, means that the type, author, recipient(s) of the original, recipient(s) of copies, date, and subject of the document should be specified.

"Identify," when used with respect to communications, means that the type of communication, maker of the communication, persons communicated to, persons for whom the communication was intended, date and subject of the communication should be specified.

"Identify," when used with reference to any corporation, association, cooperative, or other legal entity, means to state the name and current address of said organization or entity; if the current address is unknown, provide the last known address.

"Identify," when used with respect to any person, means that the person's name, current business address (or current mailing address for persons now retired), current job title, and employer, should be specified. If the current address is unknown, please provide the last known address.

Where more than one request in this series asks for identification of a document, communication, legal entity, or person, in response to the second and subsequent requests, please provide the name of a corporation, legal entity or person, or the date and author or maker of a document or communication, along with a reference to the response in which a full identification was provided.

E. "Representative" shall be understood to include, without limiting the generality of its meaning, any director, officer, employee, contractor, or consultant, of any person as defined in II.C., who at a particular formal or informal meeting, or in a particular document or communication, appears to participate in the meeting, or in the making of or the receipt of the document or communication, on behalf of or as agent for, said person. Whether or not a representative has actual authority as an agent of the person is irrelevant to his or her status as a representative.

F. "Relating to" or "relate" means consisting of, referring to, reflecting, or being in any way legally, logically or factually connected with. Requests "relating to" a subject or item should be understood to include possible or contemplated actions as to such subject or item. For example, a request for documents relating to interconnection plans would include documents relating to interconnection arrangements that have been considered but rejected.

G. "Electric utility" means a private corporation, cooperative, rural electric cooperative, municipality, joint stock association, or any political subdivision, agency or instrumentality of federal, state, or municipal governments, or a lawful association of any of the foregoing that owns, controls, or operates, or proposes or is studying the possibility of owning, controlling, or operating, facilities for the generation, transmission and/or distribution of electricity.

H. "Transmission services" shall mean the undertaking by a utility to transmit power and/or energy for any other electric utility, whether the power and/or energy is generated by the first utility or by any other electric utility. "Transmission services" shall also include the sale by a utility of transmission capacity without energy. "Transmission services" include wheeling.

I. "Interconnection" shall mean the physical junction of the electric transmission systems of two or more electric utilities so that electricity may flow over the junction according to location of points of power generation and power usage, in the same manner as electricity flows over the lines of an individual electric system. A junction normally maintained in an open position is considered an interconnection. A junction by which a lower voltage system is joined to a transmission line through a transformer is considered an interconnection.

"Interconnected operation" between two or more electric utilities shall mean a method of operation in which electricity flows over interconnections between the electric transmission and/or subtransmission systems of the electric utilities in the same manner as electricity flows along the lines of an individual electric system, whether or not such flow of electricity occurs pursuant to the terms of an interconnection agreement. "Interconnected operation" includes all forms of interchange, including sales, purchases or exchange of energy or capacity, reserves sharing, firm power, emergency, maintenance, seasonal, economy exchange, spinning

reserves and any similar transactions.

"Interconnection agreement" shall mean an agreement governing the rates, metering, and other terms and conditions under which interconnected operation occurs.

J. "City of Austin, Texas" or "Austin" means the City of Austin, Texas, including its electric utility department, and any other agency, creature, division, or part of the governing structure of the City of Austin having any relation to, contact with, or participation in matters affecting or relating to the sale, purchase, transmission, or exchange of electrical power or energy.

K. "Central Power & Light Company" or "CP&L" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by CP&L.

L. "Houston Lighting & Power Company" or "HL&P" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by HL&P.

M. "Texas Power & Light Company" or "TP&L" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by TP&L.

N. "Dallas Power & Light Company" or "DP&L" shall be understood to include its parent, direct or indirect subsidiary

affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by DP&L.

O. "Texas Electric Service Company" or "TESCO" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by TESCO.

P. "West Texas Utilities" or "WTU" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by WTU.

Q. "Southwestern Electric Power Company" or "SWEPCO" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by SWEPCO.

R. "Public Service Company of Oklahoma" or "PSO" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the properties or assets of which have been acquired by Public Service Company of Oklahoma.

S. "Central & South West Corporation" or "CSW" shall be understood to include its parent, direct or indirect subsidiary, affiliated, or predecessor companies and any entities providing electric service at wholesale or retail, the proper-

ties or assets of which have been acquired by CSW.

T. "Texas Utilities" or "TU" shall mean Texas Utilities Generating Company, its parent, affiliated, direct or indirect subsidiary and all predecessor companies, including, but not limited to, Texas Utilities Company, Dallas Power & Light Company, Texas Electric Service Company and Texas Power & Light Company.

U. "South Texas Units" shall be understood to refer to the nuclear generating units for which applicants in the above-captioned proceeding hold construction permits from the Nuclear Regulatory Commission.

III. DOCUMENTS NO LONGER IN AUSTIN'S POSSESSION, CUSTODY, OR CONTROL

If any document otherwise responsive to any request was, on or after December 19, 1970 (date of enactment of P. L. 91-560), but is no longer in Austin's possession, or subject to Austin's control, or in existence, state whether (1) it is missing or lost, (2) has been destroyed, (3) has been transferred voluntarily to others, or (4) has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization. Identify each such document by listing its author and addressee, type (e.g., letter, memorandum, telegram, chart, photograph, etc.), date, subject matter, whether the document (or copies) are still in existence, and if so, their present location(s)

and custodian(s).

IV. SCOPE OF PRODUCTION

Each paragraph below, unless otherwise specified, refers to all communications of which Austin is aware, made or received from January 1, 1965 to date, and to all documents made, sent, dated or received from January 1, 1965 to date, in Austin's possession, custody, or control.

V. DOCUMENTS WITHHELD AS PRIVILEGED

If any documents within any description set out below are withheld by reason of any assertion of privilege, identify each such document by date, description, and type, identify all persons preparing and/or receiving each document, and state the privilege asserted, and the reasons that, in Austin's opinion, justify the assertion of privilege as to each document.

VI. INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please respond to the subparts of interrogatory 1 separately for:

(i) Electric Reliability Council of Texas ("ERCOT")

(ii) Texas Interconnected System ("TIS")

(iii) South Texas Interconnected System ("STIS")

(a) Is Austin a member of (i) - (iii)?

(b) Please describe each formal or informal application or inquiry by Austin relating to membership by Austin in any of (i) - (iii). Include the date of each inquiry or application, and the date, format, and substance of each response by any person to each inquiry or application.

(c) Describe the application procedure at the time Austin was admitted to membership in each of (i) - (iii) above. Describe the application procedures at any earlier time(s) that Austin inquired about or applied for membership in any of (i) - (iii) above. Describe any difficulties Austin had at any time in becoming a member of any of (i) - (iii) above.

(d) Has Austin ever attempted to initiate, influence, or change policies, procedures, or actions of any of (i) - (iii) above of which it was a member? Describe each such attempt, including the date of Austin's action(s) and the substance of each such action, and the date, format, and substance of each response by any person to each such attempt. Indicate whether each such attempt was successful. Please produce all documents relating to each such attempt.

2. Please produce all documents relating to any joint actions, actual or contemplated, by three or more operating companies that are members of the Texas Interconnected System, or representatives of three or more operating companies that are members of the Texas Interconnected System, including, but not limited to, joint reports or studies, joint planning of generation or transmission expansion, and meetings of any kind. This request excludes agendas and minutes of annual or other regular meetings of TIS or its standing committees.

3. Please describe the manner in which agendas and minutes are prepared for TIS meetings and meetings of TIS committees and subcommittees. For TIS and for each TIS committee and subcommittee, please answer the following:

(a) Who is generally responsible for preparation and determination of subjects to be considered?

(b) Do prepared agendas and minutes actually reflect the substance of all discussion had during such meetings? If not, describe how actual discussion may deviate from the prepared agendas.

The scope of this interrogatory extends to all periods in which meetings of TIS or TIS committees or subcommittees have been held.

4. Please respond to this question if Austin is or has ever been a member of ERCOT.

(a) What is the purpose of ERCOT? Describe fully the functions of ERCOT, both formal and informal, with respect to the following areas:

(i) planning for construction of new generation facilities by any member electric utilities;

(ii) planning for construction of new transmission facilities by any member electric utilities;

(iii) spinning reserves of any member electric utility;

(iv) central dispatch among any or all member electric utilities;

(v) fuel acquisition by any or all member electric utilities;

(vi) interconnected operation by any or all member electric utilities.

(b) Describe fully the way in which Austin is affected by, or takes into account, the activities and/or decisions of ERCOT with respect to each of areas (i) through (vi) listed in (a) above.

(c) Produce all documents relating to (a) or (b) above.

5. Please respond to this question if Austin is or ever has been a member of TIS.

(a) What is the purpose of TIS? Describe fully the functions of TIS, both formal and informal, with respect to the following areas:

(i) planning for construction of new generation facilities by any member electric utilities;

(ii) planning for construction of new transmission facilities by any member electric utilities;

(iii) spinning reserves of any member electric utility;

(iv) central dispatch among any or all member electric utilities;

(v) fuel acquisition by any or all member electric utilities;

(vi) interconnected operation by any or all member electric utilities.

(b) Describe fully the way in which Austin is affected by, or takes into account, the activities and/or decisions of TIS with respect to each of areas (i) through (vi) listed in (a) above.

(c) Produce all documents relating to (a) or (b) above.

6. Please respond to this question if Austin is or ever has been a member of STIS.

(a) What is the purpose of STIS? Describe fully the functions, both formal and informal, of STIS with respect to

(i) planning for construction of new generation facilities by any member electric utilities;

(ii) planning for construction of new transmission facilities by any member electric utilities;

(iii) spinning reserves of any member electric utilities;

(iv) central dispatch among any or all member electric utilities;

(v) fuel acquisition by any or all member electric utilities;

(vi) interconnected operation by any or all member electric utilities.

(b) Describe fully the way in which Austin is affected by, or takes into account, the activities and/or decisions of STIS with respect to each of areas (i) through (vi) listed in (a) above.

(c) Produce all documents relating to (a) or (b) above.

7. Please produce all documents relating to any comparison of ERCOT and TIS and/or STIS. Please identify any communications of which Austin is aware relating to any such comparison. Please produce all documents relating to each such communication. For a particular communication described in this request if documents produced in response to this request fully identify and describe the substance of the communication, no further description is necessary with respect to that particular communication.

8. To the extent not produced or previously supplied in response to this interrogatory and data request or to previous related interrogatories and data requests, please produce all documents relating to membership by any electric utility in STIS, TIS, or ERCOT.

9. Please produce all indexes or other descriptions, either partial or complete, computerized and/or manually created, to discovery documents produced in response to interrogatories and document requests propounded in West Texas Utilities Co. v. Texas Electric Service Co., Case No. CA3-76-0633F (N. D. Texas, Dallas Div.) or in other related proceedings as noted in the Licensing Board's Special Prehearing Conference Order in the above-captioned proceeding dated July 13, 1978.

10. Please produce all documents relating to purchase and/or sale of bulk power and/or energy by Austin. Exclude billing log data.

11.(a) Describe all offers of participation in the South Texas Units 1 and 2, including all electric utilities to which offers were made, the representative(s) by whom each offer was made, the representative(s) of each utility to which offers were made, the date of each such offer, and the terms of each such offer.

(b) Produce all documents relating to participation, actual or potential, by any electric utility in the South Texas Units, including the terms and conditions, limitations or restrictions of such participation.

(c) Identify all communications among officers, representatives or employees of Austin and all communications be-

tween any officer or representative of Austin and any other person, relating to participation in the South Texas Units by any other electric utility. Provide all documents relating to each such communication. If documents provided in response to (b) above fully identify a particular communication, no further response is required as to that particular communication.

12. Please describe fully each use by Austin of transmission facilities owned jointly by Austin and other persons, and of transmission facilities owned entirely by others. This request includes both actual and potential uses.

(b) Has Austin ever had difficulty in obtaining access to transmission services provided by other persons, or to transmission facilities owned in whole or in part by other persons? Please describe fully each such instance of difficulty of access.

(c) Please describe each instance, actual or potential, of construction, by any person other than Austin or a person under the control of Austin, of additional transmission facilities, or of increasing the capacity of existing transmission facilities owned in whole or in part by any person other than Austin, for the purpose of providing transmission services to Austin.

(d) Please provide all documents relating to any of (a)-(c) above. Exclude routine back-up engineering documents, accounting documents, unimportant duplicates, and incidental documents that do not relate to policy of any person and do not have significance in terms of decisions affecting use of transmission facilities or capacity or construction of transmission facilities.

13. To the extent not otherwise provided or supplied in response to this interrogatory and data request, or to previous related interrogatories and data requests, please produce all documents relating to interconnection and/or interconnected operation of Austin with any other electric utilities. Routine documents relating to accounting and operations may be excluded.

14. Please produce copies of all interconnection agreements entered into between Austin and any other party.

15. Please produce all documents relating to policy for participation, actual, planned or potential, or to establishing terms for any participation, by any electric utility in any generation facility of which Austin is whole or part owner.

16. Please produce all documents relating to any attempts, whether actual or contemplated, by any electric utility, to acquire or to lease, either in whole or in part, the electric facilities of Austin or any other municipally or cooperatively owned and/or operated electric utility. The scope of this request is from January 1, 1957 to the present.

(b) Identify any communications of which Austin is aware by any person to any person relating to any acquisition or lease attempt referred to in (a) above. Please produce all documents relating to each such communication. If documents produced fully identify and describe the substance of a particular communication, no further response is required with respect to that particular communication.

17. Please produce rates of Austin for all classes of customers at all times since January 1, 1970.

18. Has Austin ever received an offer of a special rate or individually designed rate for any form of power and/or energy purchase since January 1, 1957? Please produce all documents relating to each such offer or rate, or potential offer or rate. Exclude routine billing documents from this request.

19. Please produce a copy of the 1994 transmission study referred to in the August 14, 1972 letter of Emmet C. Rummel (Austin) to Kermit L. Williams (HL&P) (document numbers 25130001737) and all documents relating to the study.

20. Please state all reasons that Austin has considered for and against operating in interstate commerce. Please produce principal documents relating to each such reason.

21.(a) Please produce all documents relating to any actual or potential purchase by Austin of power and/or energy from the City of Denton, Texas. Identify all communications between officers or representatives of Austin and any other person relating to the purchase of Austin of power and/or energy from the city of Denton, Texas. If documents produced in response to this request fully identify and describe the substance of a particular communication, no additional response is required with respect to that particular communication.

(b)(i) Did Austin at any time during 1974 discuss, negotiate, or in any way communicate with officers or representatives of the City of Denton, Texas relating to possible purchase of power and/or energy by Austin from the City of Denton, Texas?

(ii) If the answer to (b)(i) is in the affirmative, did Austin and the City of Denton, Texas enter into any contract or agreement relating to the purchase of power and/or energy by Austin from the City of Denton, Texas?

(iii) If the answer to (b)(ii) is negative, please list every reason for which no agreement or contract between Austin and the City of Denton was reached. Please produce all documents related to each such reason.

22.(a) To the extent not produced or previously supplied in response to this interrogatory and data request, or to previous related interrogatories and data requests, please produce all documents relating to actual, potential, possible or contemplated competition between Austin and any other electric utility.

(b) Please identify all communications among officers, representatives or employees of Austin, or between any officer or representative of Austin and any other person, relating to competition as described in (a) above. Please produce all documents relating to each such communication. If documents produced in response to this interrogatory and data request or to previous related interrogatories and data requests fully identify and describe the substance of a particular communication, no further information is necessary with respect to that particular communication.

23. Please furnish a copy of all Austin's responses to interrogatories and document requests submitted to Austin in the instant proceeding by any other party, including all schedules, exhibits, appendices, attachments, and collections or compilations of documents.

24. Please update responses to all interrogatories and data requests received by Austin in this proceeding or in any related proceeding (listed at pages 6-7 of the Special Prehearing Conference Order of July 13, 1978 in the above-captioned proceeding), the discovery of which has been ordered to be treated as part of the discovery in this proceeding.

25. Please identify the persons who prepared or assisted in the preparation of Austin's response to each of the foregoing requests.

Respectfully submitted,

Marc Poirier

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

Law Offices of:
Spiegel & McDiarmid
2600 Virginia Avenue, N.W.
Washington, D.C. 20037
(202) 333-4500

UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
Houston Lighting & Power Company)	Docket Nos. 50-498A
The City of San Antonio)	and 50-499A
The City of Austin)	
Central Power & Light Company)	
(South Texas Project, Unit Nos.)	
1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing INITIAL INTERROGATORIES TO AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS BY THE CITY OF AUSTIN, TEXAS FROM THE PUBLIC UTILITIES BOARD OF THE CITY OF BROWNSVILLE, TEXAS in the above-captioned proceeding to be served on the following by deposit in the United States mail, first class, postage prepaid, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission internal mail system, this 31st day of January, 1979.

<p>* Marshall E. Miller, Chairman Atomic Safety & Licensing Board Panel Nuclear Regulatory Commission Washington, D. C. 20555</p>	<p>Joseph J. Saunders, Esquire Chief, Public Counsel & Legislative Section Department of Justice P. O. Box 14141 Washington, D. C. 20044</p>
<p>* Sheldon J. Wolfe, Esquire Atomic Safety & Licensing Board Panel Nuclear Regulatory Commission Washington, D. C. 20555</p> <p>Michael L. Glaser, Esquire 1150 17th Street, N. W. Washington, D. C. 20036</p>	<p>Joseph Gallo, Esquire Richard D. Cudahy, Esquire Robert H. Loeffler, Esquire Isham, Lincoln & Beale Suite 701 1050 17th Street, N. W. Washington, D. C. 20036</p>
<p>* Joseph Rutberg, Esquire Artitrust Counsel Counsel for NRC Staff Nuclear Regulatory Commission Washington, D. C. 20555</p>	<p>John D. Whitler, Esquire Ronald Clark, Esquire Department of Justice P. O. Box 14141 Washington, D. C. 20044</p>
<p>* Chase R. Stephens, Chief Docketing and Service Section Office of the Secretary Nuclear Regulatory Commission Washington, D. C. 20555</p>	<p>Joseph Knotts, Esquire Nicholas S. Reynolds, Esquire Debevoise & Liberman 1200 17th Street, N. W. Washington, D. C. 20036</p>

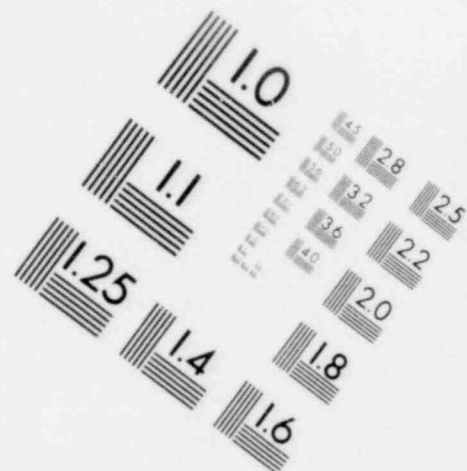
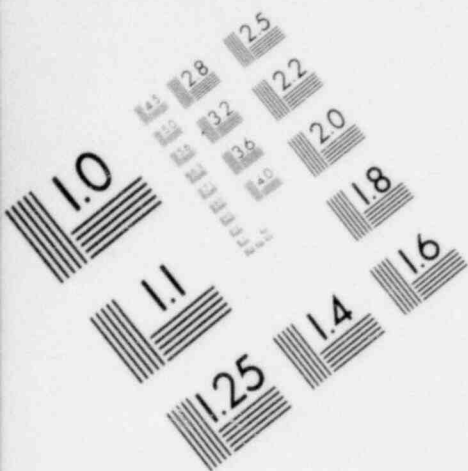
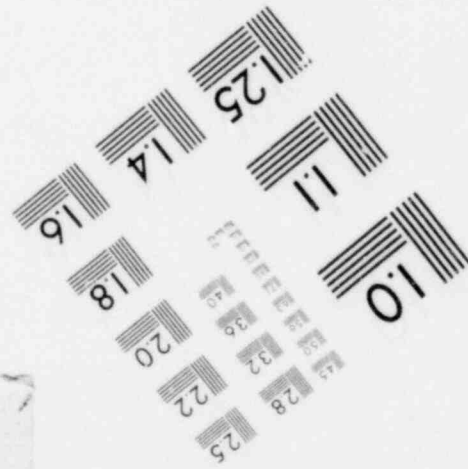
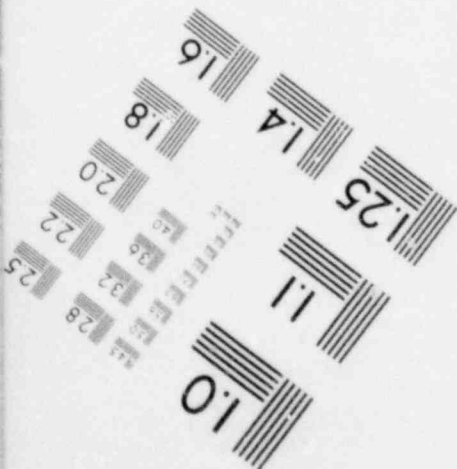
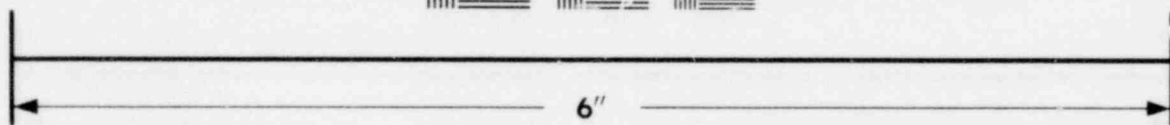
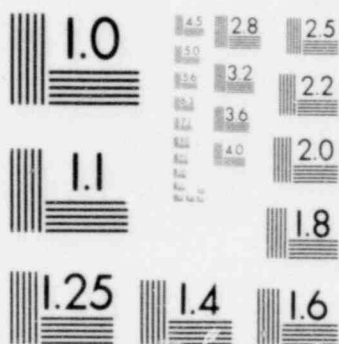


IMAGE EVALUATION
TEST TARGET (MT-3)



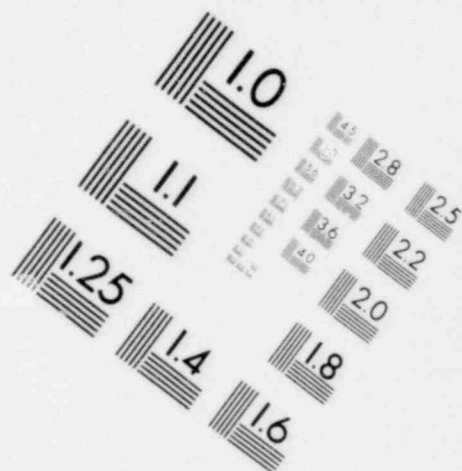
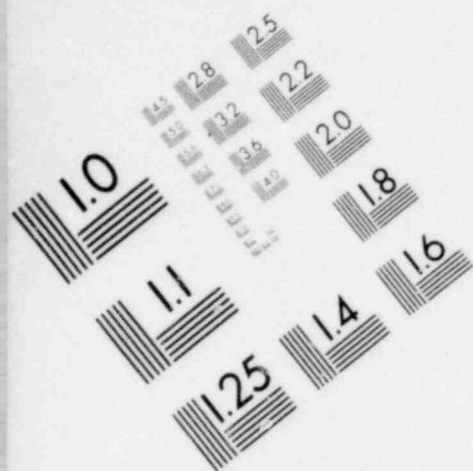
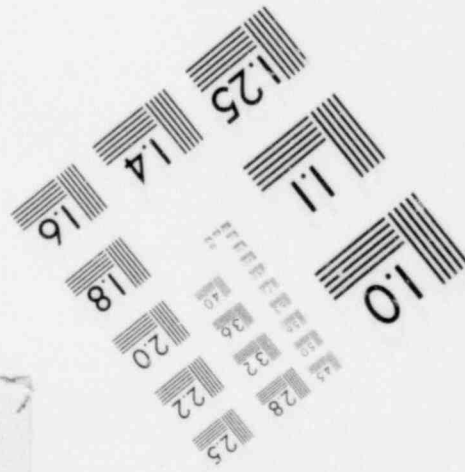
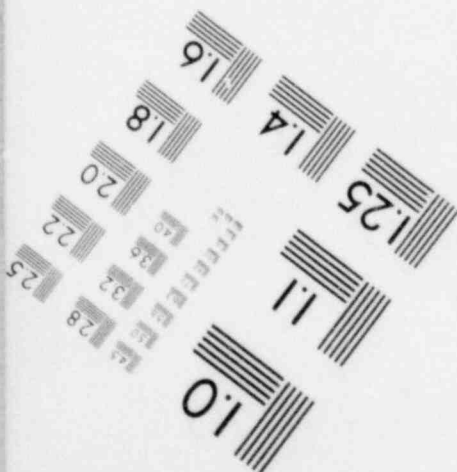
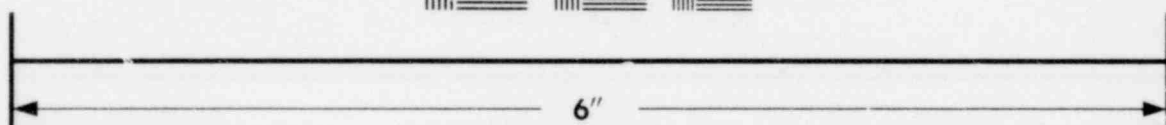
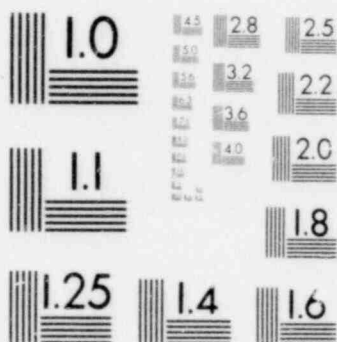


IMAGE EVALUATION
TEST TARGET (MT-3)



Douglas F. John, Esquire
Akin, Gump, Hauer & Feld
1100 Madison Office Building
1155 15th Street, N. W.
Washington, D. C. 20024

R. Gordon Gooch, Esquire
John P. Mathis, Esquire
Baker & Botts
1701 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

Robert Lowenstein, Esquire
J. A. Bouknight, Jr., Esquire
Lowenstein, Newman, Reis &
Axelrad
1025 Connecticut Avenue, N. W.
Washington, D. C. 20036

William J. Franklin, Esquire
Lowenstein, Newman, Reis &
Axelrad
1025 Connecticut Avenue, N. W.
Washington, D. C. 20036

Frederick H. Ritts, Esquire
Law Offices of Northcutt Ely
Watergate 600 Building
Washington, D. C. 20037

Wheatley & Miller
1112 Watergate Office Building
2600 Virginia Avenue, N. W.
Washington, D. C. 20037

Roff Hardy, Chairman and Chief
Executive Officer
Central Power & Light Company
P. O. Box 2121
Corpus Christi, Texas 78403

G. K. Spruce, General Manager
City Public Service Board
P. O. Box 1771
San Antonio, Texas 78203

Jon C. Wood, Esquire
W. Roger Wilson, Esquire
Matthews, Nowlin, Macfarlane
& Barrett
1500 Alamo National Building
San Antonio, Texas 78205

Perry G. Brittain, President
Texas Utilities Generating
Company
2001 Bryan Tower
Dallas, Texas 75201

Joseph I. Worsham, Esquire
Merlyn D. Sampels, Esquire
Worsham, Forsythe & Sampels
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

Spencer C. Relyea, Esquire
Worsham, Forsythe & Sampels
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

R. L. Hancock, Director
City of Austin Electric
Utility Department
P. O. Box 1088
Austin, Texas 78767

Jerry L. Harris, Esquire
City Attorney
City of Austin
P. O. Box 1088
Austin, Texas 78767

Richard C. Balough, Esquire
Assistant City Attorney
City of Austin
P. O. Box 1088
Austin, Texas 78767

Dan H. Davidson
City Manager
City of Austin
P. O. Box 1088
Austin, Texas 78767

Don R. Butler, Esquire
Sneed, Vine, Wilkerson, Selman
& Perry
P. O. Box 1409
Austin, Texas 78767

Morgan Hunter, Esquire
McGinnis, Lochridge & Kilgore
900 Congress Avenue
Austin, Texas 78701

Kevin B. Pratt, Esquire
Assistant Attorney General
P. O. Box 12548
Capital Station
Austin, Texas 78711

Linda L. Aaker, Esquire
Assistant Attorney General
P. O. Box 12548
Capital Station
Austin, Texas 78711

E. W. Barnett, Esquire
Charles G. Thrash, Jr., Esquire
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

J. Gregory Copeland, Esquire
Theodore F. Weiss, Jr., Esquire
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

G. W. Oprea, Jr.
Executive Vice President
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77001

W. S. Robson, General Manager
South Texas Electric Cooperative,
Inc.
Route 6, Building 102
Victoria Regional Airport
Victoria, Texas 77901

Michael I. Miller, Esquire
Richard E. Powell, Esquire
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

David M. Stahl, Esquire
Thomas G. Ryan, Esquire
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

Knoland J. Plucknett
Executive Director
Committee on Power for the
Southwest, Inc.
5541 Skelly Drive
Tulsa, Oklahoma 74135

Jay M. Galt, Esquire
Looney, Nichols, Johnson &
Hayes
219 Couch Drive
Oklahoma City, Oklahoma 73101

John E. Mathews, Jr., Esquire
Mathews, Osborne, Ehrlich,
McNatt, Gobelman & Cobb
1500 American Heritage Life Bldg.
Jacksonville, Florida 32202

Robert E. Bathen
R. W. Beck & Associates
P. O. Box 6817
Orlando, Florida 82803

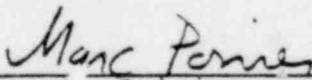
Somervell County Public Library
P. O. Box 417
Glen Rose, Texas 76403

Maynard Human, General Manager
Western Farmers Electric Coop.
P. O. Box 429
Anadarko, Oklahoma 73005

James E. Monahan
Executive Vice President and
General manager
Brazos Electric Power Coop., Inc.
P. O. Box 6296
Waco, Texas 76706

Judith Harris, Esquire
Department of Justice
P. O. Box 14141
Washington, D. C. 20044

* Jerome Saltzman, Chief
Antitrust & Indemnity Group
Nuclear Regulatory Commission
Washington, D. C. 20555



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