

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. 50-498A
Central Power & Light Company	)	and 50-499A
(South Texas Project, Units	)	
No. 1 & No. 2)	)	

INITIAL INTERROGATORIES TO AND FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS BY  
THE CITY PUBLIC SERVICE BOARD OF SAN ANTONIO, 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 Public Service Board of San Antonio, Texas ("PSB").

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)

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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 PSB 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 PSB 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 PSB, 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 PSB, 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 Public Service Board of San Antonio, Texas" or "PSB" means the City of San Antonio, Texas, acting by and through the City Public Service Board of San Antonio, Texas, and any other agency, creature, division, or part of the governing structure of the City of San Antonio 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 properties 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 issued by the Nuclear Regulatory Commission.

### III. DOCUMENTS NO LONGER IN PSB'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 PSB's possession, or subject to PSB'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 PSB 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 PSB'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 PSB's opinion, justify the assertion of privilege as to each document.

#### VI. INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS:

1. Please respond to the parts 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 PSB a member of any of (i)-(iii)?

(b) Please describe each formal or informal application or inquiry by PSB relating to membership by PSB in any of (i)-(iii). Include the date of each inquiry or application, and the date and substance of each response by any person to each inquiry or application. Please produce all documents related to each such inquiry or application. This request includes all formal and informal applications up to and including the application (if any) that resulted in PSB's membership in each of (i)-(iii) above.

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

(d) Has PSB 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 PSB'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 PSB 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 PSB 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 PSB 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 PSB 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 PSB 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 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 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 PSB 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 any documents relating to any comparison of ERCOT and TIS and/or STIS. Please identify any communications of which PSB 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 PSB. 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 PSB and all communications between any officer or representative of PSB 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.(a) Please describe fully each use by PSB of transmission facilities owned jointly by PSB and other persons, and of transmission facilities owned entirely by others. This request includes both actual and potential uses.

(b) Has PSB every had difficulty in obtaining access to transmission services provided by other persons, or to transmission facilities owned 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 PSB or a person under PSB's control, of additional transmission facilities, or of increasing capacity of existing transmission facilities owned in whole or in part by any person other than PSB, for the purpose, in whole or in part, of providing transmission services to PSB.

(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 interrogatories and data requests, please produce all documents relating to interconnection and/or interconnected operation of PSB with any other electric utilities. Exclude routine documents relating to accounting or operations

14. Please produce copies of all interconnection agreements entered into between PSB 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 PSB is whole or part owner.

16.(a) 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 PSB 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 PSB 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 PSB for all classes of customers at all times since January 1, 1970.

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

19.(a) Please produce all documents relating to the indication by WTU that it had excess oil-fired generation capacity during the period from May 4, 1976 to May 2, 1977, as described in 1.(a) of the Response of the City of San Antonio to First Set of Interrogatories and Requests for Production of Documents from the Department of Justice, dated January 4, 1979. ("San Antonio Response").



(b) Please identify each communication relating to the indication by WTU referred to in (a) of this request. Please produce all documents relating to each such communication. With regard to a particular communication, if documents provided in response to (a) and (b) fully identify and describe the substance of a particular communication, no further response is necessary with respect to that communication.

(c) What is the basis for PSB's statement that the WTU indication referred to in (a) above was made "to TIS members with which it [WTU] was then connected"? San Antonio Response, No. 1.a), at page 3.

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

21.(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 PSB and any other electric utility.

(b) Please identify all communications among officers, representatives and employees of PSB, or between any officer or representative of PSB and to any other person, relating to competition as described in (a) above. Please produce all documents related 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.

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

23. Please update responses to all interrogatories and data requests received by PSB 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.

24. Please identify the persons who prepared or assisted in the preparation of PSB'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

UNITED STATES OF AMERICA  
BEFORE THE  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
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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 PUBLIC SERVICE BOARD OF SAN ANTONIO, 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 &amp; Licensing Board Panel Nuclear Regulatory Commission Washington, D. C. 20555</p> <p>* Sheldon J. Wolfe, Esquire Atomic Safety &amp; 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 Rutberg, Esquire Antitrust Counsel Counsel for NRC Staff Nuclear Regulatory Commission Washington, D. C. 20555</p> <p>* Chase R. Stephens, Chief Docketing and Service Section Office of the Secretary Nuclear Regulatory Commission Washington, D. C. 20555</p>	<p>Joseph J. Saunders, Esquire Chief, Public Counsel &amp; Legislative Section Department of Justice P. O. Box 14141 Washington, D. C. 20044</p> <p>Joseph Gallo, Esquire Richard D. Cudahy, Esquire Robert H. Loeffler, Esquire Isham, Lincoln &amp; Beale Suite 701 1050 17th Street, N. W. Washington, D. C. 20036</p> <p>John D. Whitler, Esquire Ronald Clark, Esquire Department of Justice P. O. Box 14141 Washington, D. C. 20044</p> <p>Joseph Knotts, Esquire Nicholas S. Reynolds, Esquire Debevoise &amp; Liberman 1200 17th Street, N. W. Washington, D. C. 20036</p>
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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 Manger  
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

D. 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 Poirier*

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