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May 2, 1979



Mr. Chase Stephens, Chief
Docketing & Service Section
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

RE: Houston Lighting & Power Company, et al. (South Texas Project, Unit Nos. 1 and 2), Docket Nos. 50-498A and 50-499A; Texas Utilities Generating Company, et al. (Comanche Peak Steam Electric Station, Unit Nos. 1 and 2), Docket Nos. 50-445A and 50-446A

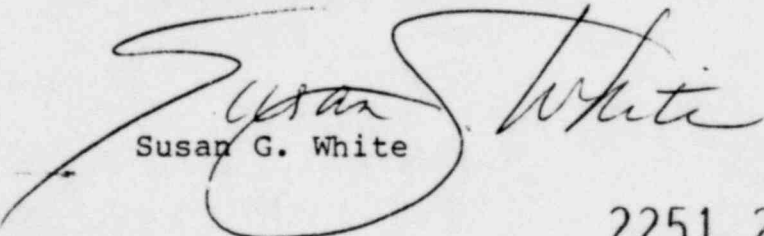
Dear Mr. Stephens:

Enclosed for filing in the above-captioned proceedings on behalf of the Public Utilities Board of the City of Brownsville, Texas are two originals and forty copies of the following:

"Response of the Public Utilities Board of the City of Brownsville, Texas to Houston Lighting and Power Company's First Request for Production of Documents and to Houston Lighting & Power Company's First Set of Written Interrogatories"

Please have the two extra copies enclosed date stamped and returned to this office in the envelope provided.

Respectfully submitted,


Susan G. White

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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
et al.)	and 50-499A
)	
(South Texas Project, Unit Nos.)	
1 and 2))	
)	
)	
)	
In the Matter of)	
)	
TEXAS UTILITIES GENERATING COMPANY,)	Docket Nos. 50-445A
et al.)	and 50-446A
)	
(Comanche Peak Steam Electric)	
Station, Unit Nos. 1 and 2))	

RESPONSE OF THE PUBLIC UTILITIES BOARD OF THE CITY OF
BROWNSVILLE, TEXAS TO HOUSTON LIGHTING AND POWER COMPANY'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
AND TO HOUSTON LIGHTING & POWER COMPANY'S
FIRST SET OF WRITTEN INTERROGATORIES

The Public Utilities Board of the City of
Brownsville, Texas, ("PUB") hereby responds to:

- (1) Houston Lighting & Power Company's First Request for Production of Documents to the Public Utilities Board of the City of Brownsville, Texas; and
- (2) Houston Lighting & Power Company's First Set of Written Interrogatories to the Public Utilities Board of the City of Brownsville, Texas.

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Document Production

Houston Lighting & Power Company requests that the following documents be produced for inspection and copying:

1. All documents identified in response to Houston Lighting & Power Company's First Set of Written Interrogatories to the Public Utilities Board of the City of Brownsville, Texas.

2. All documents referring or relating to or setting forth testimony given by PUB or any other entity before the Public Utility Commission of Texas in Docket No. 1776 (Generic Rate Hearings).

3. All documents referring or relating to or setting forth PUB's membership in ERCOT and requests for membership in TIS.

4. All documents referring or relating to participation by PUB in the South Texas Project.

5. All documents referring to relating to or setting forth any solicitations and/or offers made to PUB regarding participation in the South Texas Project.

6. All documents referring or relating to or setting forth any consideration, analysis or study of PUB's operation or contemplated operation in synchronous interconnection with any utility operating in interstate commerce or any utility otherwise synchronously interconnected with a utility operating in interstate commerce (including any utility located in Mexico).

7. All documents referring or relating to or setting forth contemplated transmission changes, additions and related connections by PUB necessary for PUB to take power from the South Texas Project, including any changes or additions required to the underlying lower voltage network.

8. Since 1965, all of PUB's annual reports, prospectuses, and FPC (now FERC) Form 1's or comparable reports to other Federal or State agencies.

Response

Copies of documents requested herein are being supplied to HL&P under separate cover.

In addition to the documents supplied, certain of the minutes of meetings of the Public Utilities Board are

responsive to these interrogatories. The minutes are voluminous and will be made available to HL&P for inspection and copying in Brownsville, if HL&P so desires, at a mutually convenient time.

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Interrogatory No. 1

1. Separately state for PUB the total megawatts of generating capacity in each year since January 1, 1968, and define the basis upon which such capacity was measured, i.e., nameplate, maximum dependable capacity, etc.

Response

For each year since January 1, 1968, PUB has had installed nameplate generating capacity as follows:

	<u>MW</u>
1968	68.0
1969	68.0
1970	68.0
1971	68.0
1972	68.0
1973	113.0
1974	113.0
1975	119.6
1976	119.6
1977	119.6
1978	113.0
1979	113.0

Interrogatory No. 2

2. Separately state for PUB in each year since January 1, 1968 the total megawatt-hours of electricity generated; the average cost of generation per megawatt-hour; the average cost of generation per megawatt-hour for operating costs excluding fuel, maintenance costs and fuel costs; the average cost of fuel per million BTU; and the average BTU per kilowatt hour.

Response

Table 1, which is attached, provides the requested data for 1968 through 1978.

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Interrogatory No. 3

3. Separately describe for PUB each rate schedule under which PUB has extended or offered electric service to industrial customers since January 1, 1968, and provide the criteria that each company used to define an industrial customer.

Response

Attached are copies of City of Brownsville Ordinances establishing and describing rate schedules under which PUB has extended electric service to its customers since January 1, 1968. Those rate schedules include the criteria an industrial customer must meet to be eligible for service under the specific rates.

PUB will shortly establish new rate schedules. Copies of such schedules will be provided when they become available.

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