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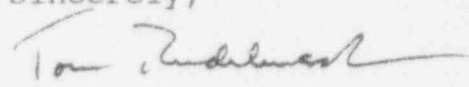
Re: Gulf States Utilities Company, (River Bend
Station), NRC Docket No. 50-458-OLA

Dear Mr. Wetterhahn:

I enclose Cajun Electric Power Cooperative, Inc.'s
further Responses to GSU's Discovery Requests.

Please call if you have any questions.

Sincerely,



Thomas L. Rudebusch

Enclosure

cc: Honorable Richard F. Cole (by mail)
Honorable Peter S. Lam (" ")
Honorable B. Paul Cotter, Jr. (" ")
Ann P. Hodgdon, Esq. (" ")
Robert B. McGehee, Esq. (" ")
John Schwab, Esq. (" ")

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Cajun Electric Power Cooperative, Inc.'s,
Responses to First Set of Interrogatories of
Gulf States Utilities Company
Docket No. 50-458-OLA

1. Identify each and every safety issue, concern, or allegation (individually or collectively "matter") related to the operation of River Bend station that has ever been identified, or raised by Cajun to GSU, EOI or NRC (state which). For each such matter raised, identify the following:
 - a. A detailed description of the nature of the issue, concern or allegation.
 - b. The manner in which the safety of the facility was asserted to be or could be affected.
 - c. Any rule, regulation, license or NRC guidance or licensee commitment which was violated or threatened to be violated.
 - d. The structure, system and/or component to which the issue related, giving all specifics such as system or component identifying mark or number shown on the component or relevant engineering drawings, figures, or diagrams.
 - e. The date on which the matter was discovered or identified.
 - f. The date the matter was reported to GSU, EOI and/or the NRC, and the person to whom it was reported.
 - g. The persons discovering the matter.
 - h. The manner in which the matter was discovered or identified, e.g., plant tour, review of drawings or documents.
 - i. The person reporting the matter to GSU, EOI and/or the NRC.
 - j. The name of each and every person who gave further information, opinion, or conclusions concerning that matter to Cajun, GSU, EOI and/or the NRC, and a description of such communication and an identification of any written communication.
 - k. Describe the resolution of the matter proposed by GSU or EOI and if such resolution was not deemed satisfactory by Cajun so state, describing why the resolution was unsatisfactory in relation to applicable rules and regulations of the NRC and the River Bend Operating License.
 - i. If the issue is still pending, state the status of the matter.
 - m. Identify all documents associated with each matter identified.

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RESPONSE

In addition to Cajun's pleadings in this case, During the spring of 1988, Larry Johnson of Cajun informed the River Bend Plant Manager, Tom Plunkett, Pete Freehill and Ken Suhkre, all of Gulf States, there was a possible problem with the service water lines providing cooling water to the hydrogen coolers. Mr. Johnson reported this potential problem as a result of a plant tour during a refueling outage.

PREPARER Victor J. Elmer

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2. For each such Cajun individual identified in Interrogatory 1, provide:
- Full name, address, telephone number, employer, employer's address, date of birth, education, employment experience, a description of all training in scientific and technical disciplines.
 - A description of his expertise in the operation of nuclear power plants, including the areas of expertise claimed.
 - An identification of the nuclear power plants at which such individual has been employed, been a consultant or provided consulting services, the dates on which those services were performed, the facility, the entity to which such services were provided and whether such individual had unescorted access at such facility.
 - An identification of all NRC licenses held and the dates on which such licenses were active.

RESPONSE

Larry G. Johnson
10829 Danbury
Baton Rouge, LA 70809
DOB: 11-22-50
Education: B.S. Mechanical Engineering

Work Experience prior to joining Cajun:

Middle South Utilities - Mississippi Power & Light Co. Grand Gulf Nuclear Station Contracts and Construction Superintendent. In charge of contracts and plant modification in a 1250 MW nuclear power plant (BWR). This position involves coordination, planning and scheduling of both outage and non-outage work efforts. Responsibilities include organizing contractor personnel and their facilities to support both maintenance and design change package work, especially during outages. This assignment is a front-line field position requiring daily interface with both the contractor and upper management. The administrative portion of this position involves supervising contract administrators, procedure development, budget analysis, and tracking mechanisms to ensure that the proper tools are in place to carry out and control the contractor work effort on plant modification and maintenance packages.

Middle South Services, Inc. - New Orleans, LA Mechanical Field Engineer (6/84 to 2/86). Assigned to the Task Force initiating the Plant Modification and Outage Section of a

Cajun Electric Power Cooperative, Inc.'s,
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1240 MW nuclear power plant (BWR). The assignment was to establish this organization and to have it in place as soon as possible to support plant outage efforts. Once this group was established, I continued working within it by being involved with the planning and implementation of the Ten-Year (ISI) plan and the IHSI efforts on Recirculation system. Mechanical Field Engineer (11/81 to 6/84). Assigned to the Containment/Drywell area of a 1250 MW nuclear power plant (BWR) as a contractor coordinator. Activities involved monitoring construction and QA efforts in this area and coordinating the Preservice/Inservice inspection of the Reactor Pressure Vessel.

Power Systems, Inc. - Schaumburg, Illinois, Assistant Piping Superintendent (10/80 to 11/81). Supervised craft in the installation of piping systems in a 560 MW coal-fired power plant. I also participated in the bid, procurement, and subcontract phase of this project. Instrument Superintendent (10/78 to 10/80). Supervised craft in the mechanical installation of all instrumentation in a 600 MW coal-fired power plant.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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3. Identify every Cajun representative having unescorted access to the River Bend site since operation has begun. Provide the following information for each such person identified:
- a. Name, title, employer, education, training, professional or technical experience in nuclear power operation, dates on which individual had unescorted access, badge number, if known.
 - b. Duties and responsibilities of such individual having unescorted access at the River Bend, the dates on which such individual visited or worked at River Bend, any efforts exerted by such individual to seek out safety issues, the periods that the individual accessed the protected area, the restricted area, vital areas and/or radiologically controlled areas.
 - c. Any safety issues, concerns or allegations observed or identified by such individual and identify any documents associated with each.

RESPONSE

a. & b.

Larry Johnson - See response to No. 2
Bill Curren - Nuclear Operations Coordinator (now works for Entergy at River Bend)
Will Day - Cost Specialist
Phillip G. Harris - Chief Systems Officer (no longer employed by Cajun)
Jack M. Miller - Director, System Planning
Layne McKinney - Joint Operations Director
Gary Hall - Vice President and Corporate Controller
Joe Gore - Consultant

All Cajun employees can be reached at:

10719 Airline Highway
Baton Rouge, LA 70816

Additional research is being conducted.

- b. This information is available at the River Bend site. Cajun has requested this data.
- c. See response to No. 2.

PREPARER Victor J. Elmer

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4. Identify the individuals associated with Cajun who have had escorted access to the River Bend Station. For each such individual, state the dates on which they had escorted access, whether the escort was provided by Cajun or GSU or EOI, the nature of any safety-related matters or matters important to safety (collectively "safety matters") which were discussed in the presence of such individuals, a description of the substantive way which such individuals contributed to identification of or discussion of safety matters. Identify all documents prepared by such individuals relating to their identification of safety issues, concerns or allegations.

RESPONSE

1. Larry Celestine
2. William L. Curran
3. William S. Day
4. JD Gore
5. Gary F. Hall
6. Larry G. Johnson
7. Sonia B. LeCocq
8. Lester L. McKinney
9. Lester J. Miques, Jr.
10. Jack M. Miller
11. Don M. Mosier
12. Mikel L. Nesom
13. James M. Purtle
14. Vaughn M. Reynolds
15. Vernon W. Webb
16. Charles W. Wright

Off and on since July 1990 the following Cajun paralegals visited the River Bend site on various occasions for discovery purposes:

1. Archie Kranske
2. Natka Boyd
3. Wendy Decker
4. Lisa Goings
5. Margaret Stephens
6. Sharon (Driver) Cologne
7. Cavary Uthappa
8. Robert Bonney
9. Karen Emmich
10. Ginger Alumbaugh

Listed below are some of the trips made to River Bend by Cajun's attorneys and consultants:

Cajun Electric Power Cooperative, Inc.'s,
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<u>Date</u>	<u>Names</u>	<u>Company</u>
February 1, 1989	Robert Perkins John Riley Jack Hazan	Cajun Electric Canatom Corp. Canatom Corp.
November 1989	Don Mosier	Chartec
November 21, 1990	Don Mosier	Chartec
March 6, 1990	Don Mosier	Chartec
March 8, 1990	Don Mosier Gordon Lorimer	Chartec Canatom
March 9, 1990	Don Mosier	Chartec
Week of Feb. 23, 1990	Don Mosier Gordon Lorimer	Chartec Canatom Corp.
March 30, 1990	Jack Hazen	Canatom Corp.
January 7, 1991	Don Mosier Neil Craik	Chartec Canatom Corp.
January 21, 1991	Don Mosier	Chartec
January 22, 23, 24, 1991	Don Mosier	Chartec
January 23, 24	Neil Craik	Canatom Corp.
Week of Jan. 25, 1991	John Riley Gordon Lorimer	Canatom Corp. Canatom Corp.
April 9, 10, 1991	William Messersmith, G. Alex Weller, Joseph McReynolds, Michael Farrell, William Kohler, Allen Campbell, Michael Bell, Victor Stilwell, Larry Moriarty, Ken Biron, John Treiber, Gordon Lorimer, John Riley, Lorne Phillips, Don Mosier, Frederick Bott, David Campbell	
July 7, 1991	Dennis Johnson	
July 12, 1991	Gordon Lorimer John Riley John Treiber Larry Moriarty Lorne Phillips Ken Biron	Canatom Corp. Canatom Corp. Canatom Corp. Canatom Corp. Canatom Corp. Canatom Corp.

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July 24, 1991	Tolbert Young	Ernst & Young
July 26, 1991	Dale Bridenbaugh	MHB Technical Asso.
November 20, 1991	Don Mosier	Chartec
January 29, 1992	Richard Hubbard	MHB Technical Asso.
March 16, 1992	Marty Cuerdon Chuck Soppet B. D. Harvey Kevin Boyd	A2S Atlas Consulting Cajun Electric AES
March 31, 1992	B. D. Harvey Chuck Soppet Marty Cuerdon John Kirby (?)	Cajun Atlas Consulting A2S Atlas Consulting
Week of Nov. 14, 1992	Dennis Johnson B. D. Harvey	Cajun Electric Cajun Electric
July 15, 16, 1992	Richard Kelly	Atlas Consulting
July 15, 16, 1992	Richard Bonney	Cajun Electric
August 1992	Richard Kelly	Atlas Consulting
August 11 - 13, 1992	Richard Bonney	Cajun Electric
Week of Jan. 24, 1994	Neil Craik Don Mosier	Canatom Corp. Chartec
April 14, 1994	Dennis Connolly	Alston & Byrd
April 14, 1994	Hunter Holliday	Alston & Byrd
April 14, 1994	Beth Kirby	Alston & Byrd
April 14, 1994	Scott Mayfield	Alston & Byrd
April 14, 1994	Jennifer Moore	Alston & Byrd
April 14, 1994	Ron Reid	Alston & Byrd
April 14, 1994	Frank Smith	Alston & Byrd

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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5. Identify employees of Cajun, its agents or consultants who met with GSU, its employees, EOI, EOI employees, their contractors, or any tier of subcontractor, with regard to any safety matter, stating the place and date of the meeting, the names of all individuals present, a detailed description of the specific safety matters discussed, the resolution of such safety matters, to the extent Cajun knows, the contribution of Cajun to the discussion or resolution of such safety matters, and any followup by Cajun with regard to such safety matters. Identify all documents prepared by Cajun associated with such issues.

RESPONSE

See Response to No. 1.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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6. Identify all documents prepared by Cajun representatives reviewing the operation of River Bend relating to operation, safety, funding of safe operation or decommissioning of the unit.

RESPONSE

Cajun Electric Power Cooperative, Inc.,
Decommissioning Analysis
River Bend Nuclear Facility

(Prepared by Russ Wasson in 1985 from GSU-provided data.)

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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7. Identify each meeting with the NRC, its employees or agents relating to safety matters at which Cajun was represented through its directors, officers, employees, Members, consultants, contractors, counsel or other agents. For each such meeting, state the names of the NRC employees present, the date of the meetings, the subject matter of the meeting, the substantive contribution of Cajun to the discussion of safety matters, if any, and the resolution of any such safety matters raised by Cajun. Identify all documents prepared by Cajun associated with such meetings.

RESPONSE

See Response to No. 10.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
Responses to First Set of Interrogatories of
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8. Describe each communication between Cajun and the NRC employees or agents relating to substantive safety matters. For each such instance, state the names of the NRC employees with whom such communications occurred, state the date of the communication, state the subject matter of the communication, the substantive contribution of Cajun to the communication of any safety matters, and the resolution of any such safety matters.

RESPONSE

See Response to No. 10.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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9. Describe any systematic plan or procedure for review by Cajun or its consultants of safety matters arising at River Bend, identifying any document associated with such plan or procedure, the author of such document or plan, anyone reviewing or concurring in such document, when it was prepared, the dates of any amendments thereto, the dates on which it was implemented, and any safety matters evaluated, discovered or dispositioned in accordance with such procedure or plan.

RESPONSE

Cajun has prepared a Comprehensive Monitoring Program ("CMP") for review by Cajun or its consultants of safety matters arising at River Bend. The CMP is intended to provide timely information about the performance of River Bend and the quality of its operations. The CMP also provides insight as to how well the facility is operating relative to its peers. It also provides an understanding for expenditures made by GSU to support plant operations, provides guidance to GSU as to Cajun's position as it relates to plant operations, is intended to ensure that the operation of River Bend is fully integrated into Cajun's operation, and provides for the representation of Cajun on site at River Bend.

The CMP provides for field observations, attendance at selected meetings and review of selected documents. It also provides for statistical analysis involving performance trends, operations and maintenance practices, outage management, system design/equipment improvements and personnel training. CMP involves the development of a computer data base and analysis and the comparison of plant data to other plants. Finally, CMP involves accounting, auditing, budgeting, contract administration, compliance reviews and management reviews.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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11. Describe any limitations in access to River Bend or to information regarding safe operation which existed prior to December 31, 1993.

RESPONSE

Cajun was denied access to INPO information.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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13. Identify the additional documents, records, and River Bend operational or safety data Cajun asserts it needs to assure safe operation of the facility. Identify how each such document or communication would be utilized to assure safe operation of the facility.

RESPONSE

Cajun needs access to INPO field notes, final evaluation and exit meetings with the Plant manager.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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15. Identify the River Bend cost management and regulatory reports Cajun contends must be submitted or made available to it to assure safe operation of the facility. Describe how each such report is necessary to assure the safety of the facility.

RESPONSE

Cajun requires any regulatory reports which identify topics or issues related to safe operation of the facility and all cost management documents which address how the topics and issues will be addressed.

PREPARER Victor J. Elmer

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16. Identify the Institute for Nuclear Power Operation ("INPO") meetings Cajun is presently or has been in the past permitted to attend and identify the INPO documents to which Cajun presently or has in the past had access.

RESPONSE

Cajun has been allowed to attend INPO exit meetings open to the general public. Cajun has been denied access to the daily briefing with the plant manager and denied access to the informal exit meeting. Cajun has been allowed to review INPO field notes on past occasions, but not allowed to retain copies of field notes.

PREPARER Victor J. Elmer

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18. Identify the additional INPO documents (or specific types and subject matter of INPO documents) and meetings to which Cajun asserts access is necessary to assure safe operation of the facility and the bases for that assertion.

RESPONSE

Access to INPO briefings, informal exist meetings and field notes and reports would aid in the safe operation of the plant. With participation, Cajun representatives have and can assist in the safe operation of the facility.

PREPARER Victor J. Elmer

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22. Define the exact differences in the operation of River Bend before and after the issuance of each of the disputed license amendments which has or could result in a significant reduction in the "margin of safety" or in the level of "reasonable assurance" of safety at River Bend.

RESPONSE

As a result of the license amendments, resources allocated to operation, including maintenance, and the funding of decommissioning could be reduced or jeopardized, thereby affecting the margin of safety or the level of "reasonable assurance" of safety at River Bend. GSU will no longer operate River Bend. EOI, which seeks to assume operation of River Bend, will provide no funding for River Bend operations. Rather, funding will be provided by a subsidiary of Entergy Corporation.

PREPARER Victor J. Elmer

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33. Please provide all Cajun budgets and balance sheets for River Bend for the years 1991 to 1995, including but not limited to the budgets for River Bend O&M and decommissioning expenses.

RESPONSE

Attached are Cajun's River Bend budgets for the years 1991 through 1994. Cajun is in the process of developing its 1995 River Bend Budget but it is not complete at this time. Cajun does not have balance sheets for River Bend.

PREPARER Victor J. Elmer

CAJUN ELECTRIC POWER COOPERATIVE, INC
RIVER BEND BUDGET
CAJUN's 30% SHARE

NRCRFI33.WK1

		<u>1991</u> <u>BUDGET</u>	<u>1992</u> <u>BUDGET</u>	<u>1993</u> <u>BUDGET</u>	<u>1994</u> <u>BUDGET</u>
CAPITAL BUDGET					
Fuel:					
Nuclear Fuel Purchases	(40D)	\$ 7,345,560	\$ 4,024,711	\$ 2,237,309	\$ 7,121,400
Interest During Processing	(35D)	1,505,010	1,234,776	927,951	616,618
Less: Amortization	(40D)	(18,149,504)	(7,697,251)	(16,222,192)	(13,687,000)
Change in Fuel Inventory	(40D)	(9,298,934)	(2,437,764)	(13,056,932)	(5,948,982)
Capital Expenditures:					
Capital Projects	(70E)	4,860,060	401,300	3,361,680	4,880,000
Engineering Studies	(70G)	31,500	396,000	650,000	540,000
Subtotal		4,891,560	797,300	4,011,680	5,420,000
Low Level Waste Fund	(70E)	75,000	0	600,000	1,200,000
Spare Parts Inventory	(70E)	0	0	1,496,000	0
Subtotal Capital Expenditures		4,966,560	797,300	6,107,680	6,620,000
Decommissioning	(50A)	1,416,900	1,416,900	1,416,900	1,416,900
Total Capital		(2,915,474)	(223,564)	(5,532,352)	2,087,918
OPERATING BUDGET					
Fuel:					
Fuel Amortization	(40D)	18,149,504	7,697,251	16,222,192	13,687,000
Spent Fuel & D&D Fees	(40F)	2,066,415	952,653	2,193,600	1,973,744
Total Fuel		20,215,919	8,649,904	18,415,792	15,660,744
Insurance:	(50A)	1,800,000	1,981,200	2,000,000	1,900,000
O&M and A&G:					
Admin and General	(70A)	6,572,160	7,081,800	6,600,000	5,681,200
Operations and Maint.	(70B)	34,833,322	41,140,000	31,229,840	33,900,072
Interest on Funding-Tru-ups/Adj.	(35D)	1,028,195	127,776	111,600	44,268
Subtotal O&M and A&G		42,433,677	48,349,576	37,941,440	39,625,540
Depreciation		36,404,964	36,516,639	36,168,422	36,052,476
Total Operating		100,854,560	95,497,319	94,525,654	93,238,760
Total River Bend Budget		\$ 97,939,086	\$ 95,273,755	\$ 88,993,302	\$ 95,326,678

Note: Excludes Cajun indirect River Bend related costs (internal labor, legal, etc.)

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37. Please provide all minutes of Cajun Board of Directors' meetings or meetings of the officers of Cajun which reflect any material, documents, or discussions regarding the River Bend Litigation, the impact of a GSU or Cajun victory in the River Bend Litigation or the bankruptcy of GSU or Cajun on:
- a. Cajun's or GSU's ability to operate and maintain River Bend;
 - b. the funding of Cajun or GSU's operation and decommissioning of River Bend;
 - c. the potential shutdown of River Bend;
 - d. the procedures for the shutdown of River Bend.

RESPONSE

See Response to No. D-1.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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38. Please provide copies of all documents submitted to the Board of Directors or officers related to the matters referenced in Subsections a-d of Request 37.

RESPONSE

See Response to No. D-1.

PREPARER Victor J. Elmer

Cajun Electric Power Cooperative, Inc.'s,
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39. Please provide copies of all documents sent to the Rural Electrification Administration or received by Cajun from that agency relating to the matters referenced in Subsections a-d of Request 37.

RESPONSE

See Response to No. D-1.

PREPARER Victor J. Elmer

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40. For each of the seven conditions contained in proposed Contention 5 of Cajun Electric Power Cooperative Inc.'s Amendment and Supplement to Petition for Leave to Intervene, Comments and Request for a Hearing dated August 1, 1993, identify:
- a. The legal basis in the Atomic Energy Act of 1954, 42 U.S.C. § 2011, et seq., Energy Reorganization Act of 1974, 42 U.S.C. § 5801, et seq., or in the NRC Rules and Regulations for such condition.
 - b. The effect on safe operation of the facility were each condition separately imposed.
 - c. Whether all such proposed conditions are collectively necessary, if not, or all combinations of conditions which Cajun deems necessary and the basis for each response.
 - d. Whether and where any such conditions have previously been imposed by the NRC on any other light-water reactor licensee.

RESPONSE

- a.-d. Cajun has not prepared the legal or technical analysis GSU seeks in these questions beyond that contained in its pleadings.

PREPARER Victor J. Elmer

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D-1 Provide copies of all documents identified in the responses to the General and Specific Interrogatories set forth above, in accordance with Instruction C, above.

RESPONSE

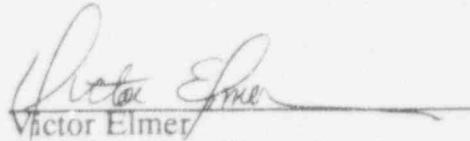
Copies of documents identified to date are available for inspection at the offices of Duncan, Weinberg, Miller & Pembroke, 1615 M Street N.W., Suite 800, Washington, DC 20036.

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

The preceding interrogatory responses were prepared under my direction and the matter and facts contained herein are true and correct to the best of my knowledge.

Dated this the 29th day of Sept, 1994.



Victor Elmer
Vice President Operations
Cajun Electric Power Cooperative, Inc.

SWORN to and subscribed before me, the undersigned authority in and for the said parish and state. Witness my signature and official seal of office on this the 29th day of September, 1994.


NOTARY PUBLIC

My commission expires at death.