



SAN DIEGO GAS & ELECTRIC COMPANY

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May 3, 1979

Director of Nuclear Reactor Regulations  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTN: Mr. Roger Boyd, Director  
Division of Project Management

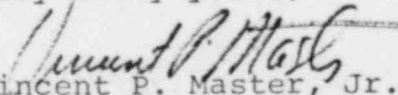
RE: Palo Verde Nuclear Generating Station  
Units 4 & 5 - Docket Nos. STN 50-592/593

Dear Mr. Boyd:

In compliance with your request for additional financial information, enclosed herewith is a document entitled "Sources of Funds for System-Wide Construction Expenditures During Period of Construction of Subject Nuclear Plant" for applicant San Diego Gas & Electric together with a list of assumptions made therein.

San Diego Gas & Electric deems the above-mentioned document to contain proprietary financial data which should be exempt from public disclosure and not be made available for inspection and copying in the NRC Public Document Room. Therefore, pursuant to 10 CFR § 2.790, transmitted herewith is an Application To Withhold A Document From Public Disclosure accompanied by the Affidavit of Richard Korpan, Treasurer, San Diego Gas & Electric, requesting the Commission to determine the document contains confidential financial information and the information should be withheld from public disclosure.

Very truly yours,

  
Vincent P. Master, Jr.

cc: w/attachments  
Richard Korpan  
Arthur Gehr, Esq./Arizona Public Service

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AN INVESTOR-OWNED CORPORATION

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ADD:  
M RUSHBROOK  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
ARIZONA PUBLIC SERVICE	)	Dockets Nos. STN 50-592
COMPANY, et al.	)	STN 50-593
	)	
(Palo Verde Nuclear Generating	)	
Station, Units 4 and 5)	)	

APPLICATION TO WITHHOLD A DOCUMENT FROM PUBLIC DISCLOSURE

SAN DIEGO GAS & ELECTRIC (SDG&E) herewith makes Application to this Commission that a document entitled, "Sources of Funds for System-Wide Construction Expenditures During Period of Construction of Subject Nuclear Plant", consisting of five (5) pages, be withheld from public disclosure on the ground that it contains confidential financial information. In support thereof, this Application is accompanied by the document, a separate summary of non-proprietary financial data, and the Affidavit of Richard Korpan, Treasurer, San Diego Gas & Electric, which:

- (i) identifies the document sought to be withheld, and

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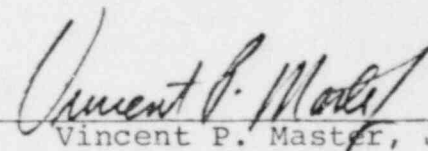
(ii) contains a full statement of the reasons on the basis of which it is claimed that the information should be withheld from public disclosure. Further, Mr. Korpan's Affidavit addresses with specificity the considerations listed in 10 CFR § 2.790 (b) (4).

WHEREFORE, San Diego Gas & Electric Company asks this Commission for a determination that the document contains confidential financial information and the information should be withheld from public disclosure pursuant to 10 CFR § 2.790.

Dated: May 3 , 1979

Respectfully submitted,  
SAN DIEGO GAS & ELECTRIC

By:

  
Vincent P. Master, Jr.

Attorney

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6 UNITED STATES OF AMERICA  
7 NUCLEAR REGULATORY COMMISSION  
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9 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
10

11 In the Matter of )  
12 ARIZONA PUBLIC SERVICE )  
COMPANY, et al. ) DOCKETS NOS. STN 50-592  
13 ) STN 50-593  
14 (Palo Verde Nuclear Generating )  
Station, Units 4 and 5) )  
15  
16

17 AFFIDAVIT OF RICHARD KORPAN IN SUPPORT OF APPLICATION  
18 TO WITHHOLD A DOCUMENT FROM PUBLIC DISCLOSURE  
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20 STATE OF CALIFORNIA, COUNTY OF SAN DIEGO:

21 I, RICHARD KORPAN, being sworn, say:

22 That I am the duly elected, qualified and acting Treasurer  
23 of SAN DIEGO GAS & ELECTRIC, and in that capacity have been  
24 specifically delegated the function of reviewing the information  
25 sought to be withheld and I am authorized to apply for its  
26 withholding on behalf of the Company.

27 The information sought to be withheld is contained in  
28 a document entitled, "Sources of Funds for System-Wide Construc-

1 tion Expenditures During Period of Construction of Subject  
2 Nuclear Plant," together with a list of assumptions made  
3 therein, submitted in compliance with Nuclear Regulatory  
4 Commission's Request for Additional Financial Information  
5 Palo Verde Nuclear Generating Station, Units Nos. 4 and 5,  
6 Docket Nos. STN 50-592 and STN 50-593, for Applicant, SAN DIEGO  
7 GAS & ELECTRIC.

8 This document should be exempt from public disclosure and  
9 not be made available for inspection and copying in the NRC  
10 Public Document Room for the following reasons:

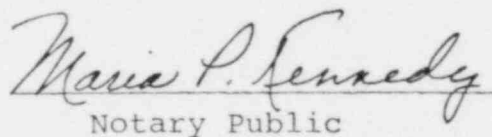
- 11 1. The document contains proprietary financial data.
- 12 2. The data contained therein are of a type which has  
13 customarily been maintained in confidence by SAN DIEGO GAS &  
14 ELECTRIC because public dissemination thereof could lead to  
15 mistaken and inaccurate conclusions concerning the future  
16 financial performance of SAN DIEGO GAS & ELECTRIC, which is  
17 a NYSE listed company.
- 18 3. Public disclosure of the data contained therein would  
19 cause substantial harm to the competitive position of SAN DIEGO  
20 GAS & ELECTRIC in future financial transactions because they  
21 reflect many indicia of performance of SAN DIEGO GAS & ELECTRIC  
22 which are necessary goals rather than assumed fact, and if  
23 disseminated would give rise to expectations in the financial  
24 community which if not realized might jeopardize SAN DIEGO GAS  
25 & ELECTRIC's ability to raise necessary investment capital.
- 26 4. The detail provided on the attached documents repre-  
27 sents only a planning guide for the Commission based on  
28 assumptions regarding future economic and regulatory conditions

1 and they should in no way be viewed as a forecast, projection  
2 or prediction of future Company results of operations. Under  
3 no circumstances should any individual rely upon such data  
4 to make an investment decision. SAN DIEGO GAS & ELECTRIC  
5 does not believe that public disclosure of such detailed  
6 long-range forecasts of financial performance would be in  
7 the best interests of the investing public.

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9   
RICHARD KORPAN

10  
11 SWORN TO BEFORE ME

12 on May 3, 1979

13  
14   
15 Notary Public



16 In and for the County of San Diego  
17 State of California.