

POWER AUTHORITY OF THE STATE OF NEW YORK

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& GENERAL COUNSEL

March 21, 1983

BY HAND

Craig Kaplan, Esq.
National Emergency Civil
Liberties Committee
175 Fifth Avenue
Suite 712
New York, NY 10010

DOCKET NUMBER
PROD. & UTIL. FAC.

50-2475P
50-2865P

Dear Mr. Kaplan:

In preparation for the upcoming testimony sponsored by the New York City Council witnesses, the Power Authority of the State of New York hereby requests production of any and all of the following documents which may be in the possession or control of any of those evidentiary witnesses:

1. Documents referring to or relating to the socioeconomic impacts of a shutdown of the Indian Point Nuclear Power Plants on southeastern New York.
2. Documents referring to or relating to alternative energy sources in southeastern New York including, but not limited to, conservation and cogeneration.
3. Testimony and exhibits provided by the witnesses.
4. Documents relied upon by the witnesses in the preparation of their testimony, or otherwise relevant to this testimony or this special proceeding.
5. The contracts of employment or retention between the witnesses and New York City Council members and the scopes of work, if not included in the contracts.

Craig Kaplan, Esq.

March 21, 1983

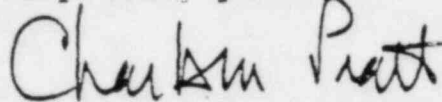
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6. Correspondence between the witnesses and New York City Council members, and their representatives, concerning this matter.
7. A list of cases of a similar nature in which the witnesses have appeared.

The definition of "document" set forth at pages 2 - 3 of Licensees' Interrogatories and Document Request Under Commission Question 6 dated June 9, 1982, shall apply to the "documents" referred to above. (A copy of the definition is annexed hereto.)

Please contact me as soon as these documents are available. If necessary, we will arrange to have a messenger pick them up.

Very truly yours



Charles M. Pratt
Assistant General Counsel

CMP/bb
encs.

In its responses to these interrogatories, intervenor shall set forth the interrogatory as posed by the licensee, then set forth its response to the interrogatory.

With respect to each interrogatory, if a particular lead or contributing intervenor does not make a particular allegation, claim, or contention, and has not been assigned lead or contributing intervenor status with respect to such allegation, claim or contention by the orders of the Board herein, said intervenor should so state.

DEFINITIONS

A. "or" shall mean and/or.

B. "Document" shall mean any kind of written or graphic matter, however produced or reproduced, of any kind of description, whether sent or received or neither, including originals, copies and drafts and both sides thereof, and including, but not limited to: papers, books, correspondence, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings (including, but not limited to, meetings of boards of directors or committees thereof), affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, financial statements, computer printouts, data processing input and output,

assumptions, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing however denominated by intervenors.

C. "Identify" or "state the identity," when referring to a document shall mean to state:

1. The generic nature of the document (e.g., letter, memorandum, telegram, etc.);
2. The date on which the document and each copy thereof was prepared;
3. The name of each author, addressor and addressee of the document;
4. The name of each past or present custodian of each copy of the document; and
5. A brief description of the contents of the document. (In lieu of such a description, you may append to your answer a true and complete copy of the document.)

D. "Identify," when referring to an oral communication, shall mean:

1. To state the date of such communications;
2. To identify each person participating therein and each person who was present;
3. To state what was said by each participant in the course of such communication, or, if not known as recalled, the substance;
4. To state whether there are any documents which set forth, summarize or refer to any portion of such oral communication; and
5. If such documents exist, to identify each such document and each person having custody of the document.

E. "Identify" or "state the identity", when referring to a person, shall mean to state: