

AFFIDAVIT OF  
WILLIAM G. COUNSIL

THE STATE OF TEXAS     :  
                                 :  
COUNTY OF DALLAS     :

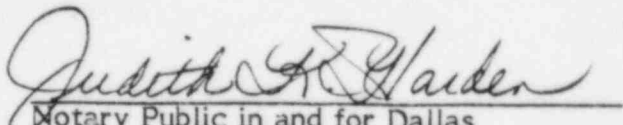
BEFORE ME, the undersigned authority, a Notary Public in and for Dallas County, Texas, on this day personally appeared WILLIAM G. COUNSIL, who by me being duly sworn upon his oath deposes and says:

My name is William G. Counsil. I am Executive Vice President of Texas Utilities Generating Company, 2500 Skyway Tower, 400 N. Olive Street, Dallas, Texas 75201. I began my employment with TUGCO effective May 1, 1985.

Until contacted by Mr. Wooldridge on or about the 21st day of May, 1985, I had no knowledge that Management Analysis Company ("MAC") had conducted a management review or audit of Comanche Peak Quality Assurance Program. I was not aware that MAC had written a report to TUGCO management until that time.

  
WILLIAM G. COUNSIL

SUBSCRIBED AND SWORN TO before me by the said WILLIAM G. COUNSIL on this, the 7<sup>th</sup> day of August, 1985.

  
Notary Public in and for Dallas  
County, Texas

My Commission Expires:

7/5/89

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