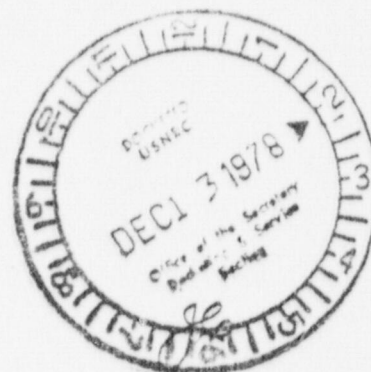


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 VIRGINIA ELECTRIC AND POWER COMPANY
 RICHMOND, VIRGINIA 23261

November 30, 1978

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 PROPOSED RULE *PR - Misc. Notice*
Reg. Guide

Mr. Samuel J. Chilk, Secretary
 U.S. Nuclear Regulatory Commission
 Washington, D. C. 20555



Dear Mr. Chilk:

In response to the recently proposed Regulatory Guide 9.4, which contains a suggested format for cash flow statements submitted pursuant to Section 140.21 of Title 10 of the Code of Federal Regulations, Virginia Electric and Power Company offers the following comments.

The proposed format requires projections of net income. Financial information of this nature is normally held in confidence by Vepco and is not normally available from public sources. In addition, the Securities and Exchange Commission is very sensitive to public disclosure of projections of this sort, and unless this information is kept strictly confidential, Vepco and other utilities that supply such information could well be subjected to disruption of their financing programs and to liability under the securities laws.

Consequently, Vepco requests that, if the proposed format is to be required, the NRC amend its regulation (e.g., 10 C.F.R. § 2.790 and/or 140.21) and Regulatory Guide 9.4 to provide that the information supplied pursuant to the 10 C.F.R. § 140.21 (e) shall be treated as confidential and exempted from public disclosure without the filing of a request for confidential treatment each time the information is provided.

Vepco respectfully requests that you give favorable consideration to the recommendation proposed herein.

Very truly yours,

B. D. Johnson
 Vice President
 and Controller

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