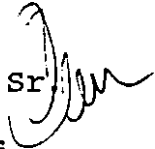


file

MEMORANDUM

TO: File

FROM: Charles H. McCrea, Sr. 

RE: Nevada Power - PCBs
File No. 11927.2

DATE: October 12, 1989

On October 11 I received a call from:

Toni Allen, Esq.
Piper & Marbury
1200 19th St. Northwest
Washington, D.C. 20036
Telephone: 202/861-3876

Ms. Allen represents Utility Solid Waste Activities Group (USWAG), one of the organizations from which the defendants have sought to subpoena documents.

Ms. Allen asked for copies of the Complaint and the Answers, which I sent to her.

She informed me that USWAG is an ad hoc group initially formed by the Edison Electric Institute (EEI) and the National Rural Electric Cooperative Association (NRECA). The American Public Power Association (NPPA) became an active participant sometime later.

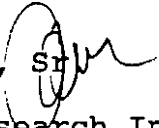
Ms. Allen has no knowledge or recollection that Nevada Power is either a member of USWAG or that it has ever participated in any USWAG activities.

1089H

cc: Thomas E. Kotoske, Esq.
David S. McCrea, Esq.
J. Randall Jones, Esq.
Nik Skrinjaric, Esq.

MEMORANDUM

TO: File

FROM: Charles H. McCrea, Sr. 

RE: Electric Power Research Institute ("EPRI")

DATE: October 12, 1989

I received a telephone call from Victoria Brieant, an attorney with:

Wilson Sonsini Goodrich & Rosati
2 Palo Alto Square
Palo Alto, California 94306
Telephone: 415-493-9300
Brieant's inside line: 415-496-4306

Ms. Brieant said that she was calling in behalf of Jane Kumin, General Counsel of EPRI.

EPRI has received a subpoena which it regards as overbroad from the defendants in Nevada Power v. Monsanto et al. Ms. Brieant has spoken with Peggy Leen, and the defendants have agreed to limit the scope of the discovery to the following documents:

1. Publications of EPRI regarding hazards of PCBs.
2. Seminar materials used by EPRI.
3. Attendance lists in respect of EPRI seminars, particularly any that would show a representative of Nevada Power present.

4. Subscription and mailing lists, particularly any on which Nevada Power would appear.

The subpoena requests all such matters back to 1960. Ms. Leen agrees that this might be overbroad and the scope of the discovery is being negotiated with EPRI.

Ms. Brieant also said that it is seeking to postpone the deposition of its witness, now set for October 17th, for about two weeks.

CHM/crr/1092H

cc:

Thomas E. Kotoske, Esq.

David McCrea, Esq.

J. Randall Jones, Esq.

Nik Skrinjaric, Esq.