

**STATE OF VERMONT  
PUBLIC SERVICE BOARD**

Amended Petition of Entergy Nuclear Vermont )  
Yankee, LLC and Entergy Nuclear )  
Operations, Inc. for amendment of their certificate )  
of public good and other approvals required )  
under 30 V.S.A. § 231(a) for authority to continue )  
after March 21, 2012, operation of the Vermont )      Docket No. 7862  
Yankee Nuclear Power Station, including )  
the storage of spent nuclear fuel )

**FIRST SET OF INFORMATION REQUESTS  
SERVED UPON ENTERGY NUCLEAR VERMONT YANKEE, LLC AND ENTERGY  
NUCLEAR OPERATION, INC. BY THE DEPARTMENT OF PUBLIC SERVICE**

The Department of Public Service ( "Department" ) serves the following First Set of Information Requests upon Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (together, "Entergy") in accordance with Public Service Board Rule 2.214 and V.R.C.P. 33 and 34, and requests that Entergy answer the requests in accordance with V.R.C.P. 33 and 34 and deliver its answers and all requested documents and materials to the Department's offices in Montpelier as soon as possible but in no case later than **August 17, 2012**. Entergy is requested to provide two complete copies of all documents. Entergy is also requested to provide a copy of its answers in electronic format, that is, Microsoft Word or other format readable by the Department.

**INSTRUCTIONS**

1. Reproduce the request being responded to before the response pursuant to V.R.C.P. 33.
2. Each response to a request must be under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.
3. Where information requested is not available in the precise form described in the question or is not available for all periods or classifications indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Entergy's workpapers and files or that is otherwise available.
4. These requests shall be deemed continuing and must be supplemented in accordance with V.R.C.P. 26(e). Entergy is directed to change, supplement and correct its answers to conform to all information as it becomes available to Entergy, including the substitution of actual data for estimated data. Responses to requests for information covering a period

not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.

5. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
6. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original.
7. With respect to each document produced by Entergy, identify the person who prepared the document and the date on which the document was prepared.
8. If any interrogatory or request requires a response that Entergy believes to be privileged, whether in whole or in part, please state the complete legal and factual basis for the claim of privilege, and respond to all parts of the interrogatory or request as to which no privilege is asserted. If a claim of privilege is asserted as to any documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject-matter of the document as well as the complete legal and factual basis for the claim of privilege.
9. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection, and respond to all parts of the interrogatory or request to the extent it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject-matter of the document as well as the complete legal and factual basis for the objection.
10. To expedite the discovery process and the resolution of this docket, Entergy should contact Aaron Kisicki, Staff Attorney to the Department as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.

**INTERROGATORIES AND REQUESTS TO PRODUCE**

1. Please provide the statutory and/or regulatory basis for Mr. Lester's statement on page 4 of his prefiled testimony that "[t]he decision on whether to allow the VY Station to continue to operate after 2012 must also consider several alternative courses of action, including greater reliance on alternative fuels and generating technologies as well as reductions in electricity use."
2. Please provide the basis for Mr. Lester's statement on page 4 of his prefiled testimony that "fossil-fuel combustion in electricity-generation facilities is the largest contributor, both nationally and globally, to the emissions of the most important greenhouse gas, carbon dioxide (CO<sub>2</sub>) . . . ."
3. In stating carbon dioxide is "the most important greenhouse gas," is it Mr. Lester's opinion that carbon dioxide is the most damaging greenhouse gas?
4. Please explain the statement on page 11, footnote 6 of Mr. Lester's prefiled testimony that the estimated temperature increases contained in the referenced MIT report and the IPCC 2007 assessment "are not strictly comparable."
5. Please provide the calculations supporting every claim presented by Mr. Lester in A7 of his testimony, beginning on page 8 and continuing through page 11.
6. Please identify the "many climate scientists" who have estimated 450-550 ppm of carbon equivalent as the acceptable upper limit on atmospheric concentration of GHGs, referred to by Mr. Lester on page 11 of his testimony. Please provide a copy of all documents supporting that claim.
7. Please provide the calculations supporting every claim presented by Mr. Lester in A9 of his testimony, beginning on page 12 and continuing through page 13.
8. Please provide the basis, including, without limitation, all assumptions and principal calculations, for Mr. Lester's conclusion on page 18 of his testimony that "only a few realistic options" exist for reducing CO<sub>2</sub> emissions from electricity generation.
9. Please provide the basis, including, without limitation, all assumptions, estimates and calculations, for Mr. Lester's conclusion on page 19 of his testimony that "[t]he longer term impact [of natural gas on GHG emissions] is less clear, however, and could be unhelpful over the longer term if it deters investment in even lower-carbon alternatives."
10. Mr. Lester states on page 19 of his testimony that "America will need even lower-carbon fuels than natural gas if energy is to be available on the scale that Americans have come to expect." Please provide the basis for this statement, including any calculations or comparisons made between the carbon impact of natural gas versus nuclear power.

11. Please provide every calculation and study supporting each claim presented by Mr. Lester in A16 of his testimony, beginning on page 21 and continuing through page 22. Please identify every document that includes contrary conclusions or information tending to refute any or all of those claims.
12. Please explain and provide the basis for Mr. Lester's characterization of the role of the VY Station as "dominant" on page 23 of his testimony,
13. Please provide all calculations supporting every claim advanced by Mr. Lester in A18 of his testimony, beginning on page 24 and continuing through page 26. Please identify every document possessed or controlled by Entergy or Mr. Lester that includes contrary conclusions or information tending to refute those claims.
14. Mr. Lester makes the claim on page 25 of his testimony that "increased energy efficiency is not on its own an alternative to continuing to operate the VY Station." Please identify all assumptions supporting that claim and explain whether Mr. Lester views it as imperative that energy efficiency provide a standalone solution, as opposed to being part of a portfolio of energy alternatives.
15. Please provide the basis for Mr. Lester's statement on page 26 of his testimony that "[i]n the short run, a loss of the electricity generated by the VY Station would have to be made up by unused existing generating capacity in the New England region or elsewhere."
16. Please state every assumption and fact relied upon by Mr. Lester when he discounts natural gas as a viable long term alternative to nuclear power.
17. Please explain and provide a basis for Mr. Lester's lack of discussion of large-scale hydropower as a viable alternative electricity source to nuclear power.
18. Please explain the effect of current and emerging storage and transmission solutions on Mr. Lester's claim on page 30 of his testimony that the main drawback of renewable technologies is that they supply power only intermittently.
19. Please provide all calculations and resources utilized to develop and support Mr. Lester's claims in A23 on pages 31 through 33 of his testimony regarding the reliability implications of depending on intermittent power sources.
20. Please state all assumptions, calculations, and estimates underlying Mr. Lester's statement on page 33 of his testimony that "there are still large uncertainties regarding cost as well as other aspects of performance and the lead-times required for initial commercialization and then large-scale deployment of [solar and wind power] technologies are likely to be considerable."
21. Please provide the calculations supporting Mr. Lester's claims in A25 of his testimony, beginning on page 34 and continuing through page 35. Please identify every document possessed or controlled by Entergy or Mr. Lester that includes contrary conclusions or

information tending to refute those claims. Please detail what expenses are included or excluded from “expenses incurred in continuing to operate” and “all-in cost” as those terms are used in Mr. Lester’s testimony.

22. Please explain Mr. Lester’s statements on page 35 of his testimony that alternatives to nuclear power will be available by the end of the 20-year period for which Entergy seeks to extend its CPG. Please identify every document possessed or controlled by Entergy or Mr. Lester that concludes or supports the conclusion that such alternatives will be available sooner, and identify all assumptions and calculations supporting Mr. Lester’s claims.
23. Please provide the basis for Mr. Dodson’s assumption on page 3 of his testimony that he “understand[s] that continued operation of the VY Station . . . does not involve or require any changes to the current Station, the Station site or operations affecting scenic or natural beauty, aesthetics, or historic sites.” Please also explain whether it is Mr. Dodson’s position that this statement is applicable over the 20-year extension period requested by Entergy.
24. Please describe the scope, including, without limitation, by identifying all assumptions made, all calculations prepared, and all documents reviewed in the course of his work, of Mr. Dodson’s review of the impact of the plume generated by the cooling towers at the VY Station, referred to on page 4 of Mr. Dodson’s testimony, and provide the results of such review.
25. Please fully describe the scope of Mr. Dodson’s review of the impact of continued operation of the VY Station past 2012, referred to on page 4 of Mr. Dodson’s testimony, and provide the results of such review.
26. Please identify and provide the “available data” reviewed by Mr. Dodson “to determine whether any historic, scenic or significant natural sites occur in the vicinity of the Station,” referred to on page 4 of his testimony; and identify all relevant data that fall outside the category of “available.”
27. Please identify all facts and assumptions supporting or providing the basis for Mr. Dodson’s conclusion that the VY Station does not have an adverse effect on the scenic or natural beauty of the area, aesthetics or historic sites. Please identify every document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
28. Please identify all facts and assumptions that provide the basis for Mr. Dodson’s statement on page 5 of his testimony that he understands the VY facility will be placed in “SAFSTOR” condition upon its closure, and discuss the relationship between those data and conclusions and other pre-filed testimony indicating that Entergy has undertaken analyses for several decommissioning scenarios, including the “DECON” scenario which

allows a closed plant to be released for unrestricted use “shortly after cessation of operations” (Cloutier PFT, A2, Executive Summary at 8).

29. Please describe in greater detail Mr. Dodson’s statement on page 5 of his testimony that if the VY Station is placed into “SAFSTOR” status, “most of the above-ground physical elements of the Station” will remain in place. In particular, please identify every physical feature that must remain unchanged and those which need not remain unchanged in order to achieve the “SAFSTOR” condition.
30. Please provide all documents relating to Entergy’s plans for placing the VY Station into either the “SAFSTOR” or “DECON” condition upon its closure. Please identify the person or persons responsible for developing those plans for the VY Station and every prior draft or version of the decommissioning plans for the VY Station.
31. Please provide the basis, including, without limitation, every fact, estimate and calculation relied upon, for Mr. Dodson’s assumption in A7 and A11 of his testimony that minimal if any changes will occur to the VY Station if it is permitted to operate for an additional 20 years.
32. Please identify all facts and assumptions that provide the basis for Mr. Dodson’s assumption on page 8 of his testimony that “no further changes in vegetation along the shoreline are planned.”
33. Please explain the criteria, including, without limitation, every fact, estimate and calculation, used by Mr. Dodson to determine that continued operation of the VY Station will not adversely impact nearby historic sites along Governor Hunt Road and in the village of Vernon, as explained in A12 of his testimony. Please identify every document possessed or controlled by Entergy or Mr. Dodson that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
34. Please identify all facts and assumptions that provide the basis for Mr. Dodson’s assumption on page 10 of his testimony that “no excavation or other development activities are contemplated for the Station’s extended operation,” especially in light of his testimony on page 5 that changes may be required to the site by the Nuclear Regulatory Commission to address Fukushima-related safety concerns. Additionally, please explain whether Mr. Dodson believes it is reasonable to assume that no excavation or development activities will take place over the 20-year period for which Entergy is requesting an amended CPG.
35. Please provide Mr. Dodson’s predictions of possible visual changes to the VY Station as a result of new requirements that may be issued by the Nuclear Regulatory Commission to address Fukushima-related safety concerns.

36. Please provide copies of all photographs taken or reviewed by Dodson and Flinker during the May 30 and June 22, 2012 site visits.
37. Please explain any manipulation or other techniques performed that altered any aspect of any or all of the photographs taken during the May 30 and June 22, 2012 site visits.
38. Please explain whether ArcMap 8.2 software is the prevailing industry-standard software used to create digital terrain models. Please provide names of other widely used digital mapping software and explain why these options were not utilized.
39. Mr. Dodson states on page 15 of his testimony that the ventilation stack is the most visually prominent feature of the VY Station from a distance. Please provide photographs or renderings from various distance intervals to illustrate this claim.
40. Please explain, including, without limitation, by identifying all assumptions made, all calculations prepared, and all documents and information reviewed in the course of his work, Mr. Dodson's statement on page 21 of his testimony that "visibility of the central portions of the Station has been increased from the river and the Hinsdale shoreline as a result of the recent clearing of vegetation near the facility for security reasons."
41. Please identify all facts and assumptions, including, without limitation, by identifying all calculations prepared and all documents reviewed in the course of his work, that provide the basis for Mr. Dodson's claim on page 22 of his testimony that transmission lines emanating from the VY Station "are not usually visually identified with the Station."
42. Please explain the details of and the impacts to the shoreline of the "periodic maintenance of vegetation" referenced by Mr. Dodson on page 27 of his testimony.
43. Please provide all facts, assumptions and calculations that support Mr. Dodson's claim on page 27 of his testimony that Entergy has invested resources to protect the Connecticut River environment.
44. Please explain, including, without limitation, by identifying every fact, estimate, and calculation relied upon, whether it is Mr. Dodson's position that elimination of the vapor plume, which he admits is visible from significant distances and a variety of vantage points, would not result in an improvement of scenic views.
45. Please describe in detail each element of the impact to the shorelines from the existence and operation of the cooling water intake and discharge points, as well as every other impact to shorelines from the VY Station. Please identify every document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
46. Please identify all facts and assumptions that provide a basis for Mr. Dodson's claim on page 39 of his testimony that "[t]he open lands now surrounding the developed portions of the VY Station will not be developed by Entergy VY." Please identify every

document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.

47. Please identify and discuss additional mitigating steps that could be taken to improve the manner in which the VY Station blends or contrasts with its surroundings.
48. Please explain whether it is Mr. Dodson's position that, by virtue of the fact that the VY Station has existed for more than 40 years, its continued operation for an additional 20 years would not adversely or unduly impact the scenic or natural beauty, aesthetics, or historic sites. Please identify all other facts and assumptions relied upon by Mr. Dodson to support that conclusion. Please identify every document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
49. Other than by providing purported reliability benefits to the region, please specify in detail how the VY Station is needed to meet the present and future demand for services.
50. Please identify all facts and assumptions that provide a basis for Mr. Tranen's claim on page 8 of his testimony that the continued operation of the VY Station would reduce the reliance on gas-fired generation in the region.
51. Please explain whether it is Mr. Tranen's position that increased fuel diversity is needed in Vermont. Please describe the variety or combination of fuel sources that Mr. Tranen believes is best, and explain why.
52. Please describe the value to Vermont electricity providers associated with the option to purchase power from the VY Station.
53. Please explain in detail the varying legal interpretations and assumptions resulting in the 55% versus 100% shares to CV and GMP as a result of the RSA, as referenced by Mr. Tranen on page 12 of his testimony.
54. Please explain all assumptions made by Mr. Tranen in calculating the value of the revenue sharing provision to Vermont consumers.
55. Please describe the impact of the Fukushima event on spot market data.
56. Please explain, including, without limitation, by identifying every fact, assumption, estimate and calculation relied upon, the wide delta in Mr. Tranen's calculations of the benefits of revenue sharing provisions to Vermont consumers (estimated between \$9 million to \$171 million), and provide more specific calculations of these benefits.
57. Please explain, including without limitation, by identifying every fact, assumption, estimate and calculation relied upon, any differences between the market effect described in the second paragraph of A36 and the market effect described in the third paragraph of

A36 on pages 20 through 22 of Mr. Tranen's testimony. Please describe the impact of Power Purchase Agreements on these effects.

58. Please identify all facts and assumptions that provide a basis for Mr. Tranen's statement on page 21 of his testimony that he "believe[s] that it is reasonable to assume that the benefit would be many millions of dollars per year."
59. Please identify all facts and assumptions that provide a basis for Mr. Tranen's assertion on page 22 of his testimony that continued operation of the VY Station will reduce transmission losses due to proximity to the Vermont load.
60. Mr. Tranen states on page 22 of his testimony that "[i]f the VY Station were not in operation, it is likely that the supply that would take its place for the region would be further away from the Vermont load than the VY Station." Please explain, including, without limitation, by identifying every fact, estimate and calculation relied upon, whether Mr. Tranen considers energy efficiency and renewable energy as viable alternatives (standing alone or in tandem with other alternatives) to nuclear power.
61. Mr. Tranen claims that continued operation of the VY Station helps the State to achieve RGGI goals. Please explain, including, without limitation, by identifying every fact, estimate and calculation relied upon, whether investment in renewable energy and/or other sources of energy to provide a bridge to cleaner energy are alternatives to accomplish this same goal.
62. Please identify all facts, estimates and calculations that provide a basis for Mr. Tranen's claim on page 25 of his testimony that natural gas generation would create air emissions that would be avoided if the VY Station continues to operate. Please identify every document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
63. Please provide all data, spreadsheets, and analysis used to generate the estimate of the value of the Revenue Sharing Agreement discussed in questions 21 through 35 of Mr. Tranen's testimony, including those used to generate Exhibits 5, 6, 7, and 8.
64. Please describe, including, without limitation, by identifying all assumptions made, all calculations prepared, and all documents reviewed in the course of making this assessment, all effects of the VY Station's withdrawals of water from the Connecticut River for cooling purposes.
65. Please describe, including, without limitation, by identifying all assumptions made, all calculations prepared, and all documents and information reviewed in the course of making this assessment, the effects of surface water from the VY Station area, including the parking lots and fuel usage areas, leaching into the ground and/or discharging directly into the Connecticut River.

66. Please provide all documents and information relating to the parking requirements, needs, and impacts of the facility, including, without limitation, all calculations and evaluations.
67. Please identify all facts, estimates and calculations that provide the basis for Mr. Goodell's prediction on page 6 of his testimony that "[t]he VY Station will continue to meet all applicable VDEC regulations regarding the disposal of waste," presumably for the 20-year period requested by Entergy in this proceeding.
68. Please identify all facts, estimates and calculations that provide the basis for Mr. Goodell's understanding that "there will be no physical changes to facilities, [and] continued operation will not create new, construction-related waste material or non-radiological harmful or toxic substances," expressed on pages 6-7 of his testimony.
69. Mr. Goodell claims on page 10 of his testimony that "[w]hile the VY Station is protected by a security fence that prevents access to the site, the VY Station's continued operation requires no changes that will further restrict access to the Connecticut River." Please explain whether potential changes to NRC requirements in response to the Fukushima incident would alter this assertion.
70. Please provide more detail regarding the small wetlands located in the operational portion of the VY Station site, referenced on page 11 of Mr. Goodell's testimony, including by identifying all studies, reports, or documents relating to these wetlands. Additionally, please detail the measures in place to ensure that these wetlands are not impacted by on-site activities and all measures that have been taken or considered as a means of mitigating any impact.
71. Please explain, including, without limitation, by identifying every fact, assumption, estimate and calculation relied upon, the expected impacts to traffic, roads, bridges, and/or railways associated with decommissioning activities as related to A17 on pages 13 and 14 of Mr. Goodell's testimony. Please identify every instance in which these impacts are reflected in the decommissioning cost estimates provided in Mr. Goodell's testimony. Identify every infrastructure change that will or may be needed due to the expected transport of extremely heavy loads to and from the site during decommissioning, identify every material object included in your assessment and state all assumptions relied upon in your assessment and analysis.
72. Please explain, including, without limitation, by identifying all assumptions made, all calculations prepared, and all documents reviewed in the course of making this assessment, the effect on the Connecticut River of the reduced amount of water returned to the River due to the evaporation processes referenced on pages 11-12 of Mr. Goodell's testimony.
73. Please identify all of Mr. Cloutier and TLG Services, Inc.'s other current and recent engagements, if any, within the nuclear power industry, including the name of clients and the nature of services provided.

74. Please list all other instances of decommissioning analysis performed by TLG other than that described in A3 in Mr. Cloutier's testimony.
75. Please describe, including, without limitation, by identifying every fact, assumption, estimate and calculation relied upon, the similarities and differences between the decommissioning cost estimates for the Pilgrim Plant and the FitzPatrick plant and the estimates discussed in A27 on page 15 of Mr. Cloutier's testimony regarding the VY Station.
76. Please provide any information consulted or generated by TLG regarding the decommissioning of Maine Yankee, Connecticut Yankee, and Yankee Rowe facilities. Was such information included in the decommissioning estimate for the VY Station?
77. Mr. Cloutier's testimony on page 15 (A27) discusses the alleged benefits that the VY Station might gain from the decommissioning of the Pilgrim and FitzPatrick facilities, which may be scheduled for decommissioning in 2032 and 2034 respectively. Please list all asserted disadvantages of concurrent or almost concurrent decommissioning projects that would impact the VY Station decommissioning.
78. Please identify all facts and assumptions that provide the basis for TLG's description of "standardized and industry accepted processes and practices" in A11 of Mr. Cloutier's testimony. Please identify every document that describes or identifies these processes and practices on which TLG based this description.
79. Please describe the "basic approach originally presented in the cost-estimating guidelines developed by the Atomic Industrial Forum (now Nuclear Energy Institute)" referenced in A11 of Mr. Cloutier's testimony. Please describe every way in which TLG's analysis deviated from that approach.
80. Please list the names, titles, current positions and experience of the individuals referred to as "TLG cost estimators with extensive decommissioning experience" referenced in A13 of Mr. Cloutier's testimony. Please provide copies of these individuals' CVs, identify the nuclear facilities for which each person has analyzed decommissioning costs, state what role each had in that process, and describe his or her role in connection with the analysis of the VY Station estimates.
81. Please describe the scope, including, without limitation, by identifying all assumptions made, all calculations prepared, all documents reviewed in the course of its work, of TLG's analysis regarding the Interim Spent Fuel Storage Installation ("ISFSI") referenced in A19 of Mr. Cloutier's testimony. Please describe where this facility would be placed, how it would be constructed, and how it would be financed.
82. Please identify, describe, and quantify, including, without limitation, by identifying every fact, assumption, estimate and calculation relied upon, whether TLG has performed any

studies and/or cost estimates related to ISFSI changes in design and construction due to Fukushima concerns.

83. Please identify, describe, and quantify, including, without limitation, by identifying every fact, assumption, estimate and calculation relied upon, whether TLG has performed any studies and/or cost estimates related to ISFSI changes in design and construction related to “below grade” storage of SNF rather than the current above grade cask design.
84. Please explain, including, without limitation, by identifying every fact, assumption, estimate and calculation relied upon, the full scope of what is included in “site restoration” in the current decommissioning cost estimate.
85. Please explain, including, without limitation, by identifying every fact, assumption, estimate and calculation relied upon, whether TLG has considered any impacts of “privatizing” the decommissioning of the VY Station similar to the approach currently underway at the Zion nuclear plant. If so, what are the cost impacts of such an approach? If not, please explain why this approach has not been considered.
86. Please explain why no other potential recoveries from the DOE other than 0 or 100% of the costs associated with SNF at the VY Station were discussed in TLG’s analysis in A20 and A26 of Mr. Cloutier’s testimony. Please identify every document reflecting analysis of other levels of recovery.
87. Please identify all facts and assumptions that provide the basis for TLG’s conclusions and descriptions of settlements between other power companies and the DOE referenced in A24 of Mr. Cloutier’s testimony. Please describe or provide any information TLG has regarding the nature of the underlying claims in these settlements, including but not limited to information about the total costs incurred by the power companies compared to amounts paid in settlement. Please identify every document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
88. Please describe or identify every document showing any analysis or comparisons by TLG of the VY Station and the “two similar boiling-water reactors” referenced in A27 of Mr. Cloutier’s testimony.
89. Please identify all information, assumptions and documents on which TLG based its “reasonable assumptions” regarding the market value of the trust funds referenced in A7 of Mr. Cloutier’s testimony and specify which information, assumptions or documents were provided or proposed by Entergy. Please identify every document that includes contrary conclusions or information tending to refute those claims, which were not prepared or submitted by a party to this proceeding.

90. Please provide the information regarding decommissioning trust fund growth rates given to TLG by Entergy and referenced in A23 of Mr. Cloutier's testimony. Identify all calculations and assumptions relied upon for those growth rates.
91. Please identify every document supporting TLG's basis for believing a 1% rate of return is likely from the trust funds referenced in A27 of Mr. Cloutier's testimony. Please identify every document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
92. Please identify all facts and assumptions that provide the basis for the assumed 3 year lag between the time at which Entergy incurred SNF management costs and the time at which the DOE would reimburse Entergy referenced in A25 of Mr. Cloutier's testimony. Please explain whether any other time estimates were considered as part of TLG's analysis and the basis for those estimates.
93. Please identify all facts and assumptions that provide the basis for concluding, in Mr. Cloutier's testimony at A24 and A25, that the costs for management of SNF that is generated *after* March 21, 2012 "are costs for which the DOE is responsible." Please include all legal analyses that supports that conclusion.
94. Please identify every document or communication between Entergy or any person or entity acting on its behalf and DOE, and all information relating to oral communications between Entergy or any person or entity acting on its behalf and DOE, relating to DOE's position on whether it is responsible for payment of costs related to SNF for SNF generated after March 21, 2012.
95. Please identify all facts and assumptions that provide the basis for Mr. Twomey's conclusion of "yes" in A15 of his testimony. Please identify every document he reviewed or relied upon regarding his determination of this response, including but not limited to all studies, research or other documents. Please identify every document possessed or controlled by Entergy or Mr. Twomey that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
96. Please identify with particularity the "relatively low" ongoing SNF management monitoring costs referenced in Mr. Twomey's testimony at A22. Please identify all facts and assumptions that provide the basis for this figure. Please identify every document that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
97. Please describe the length of "appropriate intervals of time" between Entergy seeking reimbursement from the DOE referenced in Mr. Twomey's testimony at A24 and identify all facts and assumptions that provide the basis for the decision to wait to file for reimbursement.

98. Please describe the length of the “short lag time” expected in incurring and recovering costs from DOE referenced in Mr. Twomey’s testimony at A25 and identify all facts and assumptions that provide the basis for that assumption.
99. Please identify all facts and assumptions that provide the basis for Mr. Twomey’s statement in A5 that Entergy’s 93% dependable capacity exceeds prior owner’s dependable capacity. Please identify every document possessed or controlled by Entergy or Mr. Twomey that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
100. Please identify every document relevant to Entergy’s application to the Nuclear Regulatory Commission for renewal through 2032 referenced in Mr. Twomey’s testimony at A6.
101. Please identify every document relevant to the payroll numbers, employment numbers, taxes, expenditures in Vermont, and charitable donations referenced in Mr. Twomey’s testimony at A13.
102. Please identify every document reflecting the insurance referenced in Mr. Twomey’s testimony at A21, including, but not limited to: any carriers, documentation of the sufficiency of said insurance and the terms of the referenced insurance policy(ies).
103. Please identify every document relevant to the revolving credit line referenced in Mr. Twomey’s testimony at A21, including, but not limited to: the amount of debt carried by Entergy and the terms of the credit agreement.
104. Please identify whether the ReDyn economic model used in Mr. Heaps’ calculations and reports takes into account any offsetting considerations that might mitigate or eliminate the economic impact of the VY Station’s closure, and identify what those offsetting considerations are if they are included in the model.
105. Please identify whether Mr. Heaps’ analysis takes into account the offsetting considerations that might mitigate or eliminate the economic impact of the VY Station’s closure and identify those considerations with particularity.
106. Please identify all other clients/projects taken on by Mr. Heaps within the nuclear power industry apart from Mr. Heaps’ current work for Entergy. Please describe all other work for Entergy for which Mr. Heaps was previously or is currently retained.
107. Please identify every actual or potential negative economic impact of Entergy’s continued operation in Vermont that was considered by Mr. Heaps. Please describe the nature of those impacts.
108. In exhibit EN-RWH-3 to his testimony, Mr. Heaps bases his analyses and conclusions on a regional input-output model called ReDyn. In Appendix I –Methodology of this Exhibit, Mr. Heaps states the ReDyn model is capable of various economic simulations

extending from 2012 to 2055. Please provide evidence regarding the past accuracy and confidence in an economic model that predicts outcomes extending more than 40 years, including but not limited to Mr. Heaps' experience with the model, as well as any assumptions made by the model.

109. Please identify all facts and assumptions that provide the basis for each of the calculations provided by Mr. Heaps in Exhibit EN-RWH-3 to his testimony. Please explain why the ReDyn model was selected and identify any other models considered by Mr. Heaps in preparing his testimony.
110. Please identify all facts and assumptions that provide the basis for the \$65.7 million payroll assumption referenced in Mr. Heaps' supplemental report. Please provide all documentation regarding that figure.
111. Please identify every document and every assumption relied on by Mr. Heaps in his analysis other than the TLG Report.
112. Please identify all facts and assumptions that provide the basis for Mr. Heaps' assumption that trust rates will continue to grow at a rate that would allow decommissioning to proceed in 2066 as referenced in A20. Please identify every document possessed or controlled by Entergy or Mr. Heaps that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.
113. Please identify and provide the specific economic assumptions used in preparing the "Economic Impact of the VY Station on Windham County and Vermont," including but not limited to: baseline assumptions underlying federal, state, and county economic growth, inflation, demographics, housing prices and other pertinent economic data. Please include other user-defined economic assumptions applied to alternative scenarios.
114. In Exhibit EN-RWH-3 to his testimony, Mr. Heaps calculates the Net Present Value of future economic outcomes is calculated using a real 2.5% discount rate. Please identify all facts and assumptions that provide the basis for using this discount rate and quantify what impact the discount rate had on findings and conclusions. If alternative discount rates were modeled, please provide these calculations and conclusions.
115. In Exhibit EN-RWH-3 to his testimony, Mr. Heaps states that Windham County and the State of Vermont will have less employment, wages, and tax revenues under the SAFSTOR scenario as compared to the both VY Station operating scenarios. Did Mr. Heaps consider a scenario in which local economies experienced improved economic conditions following the closure of a nuclear power plant (which some would consider a negative externality)? If not, why not?
116. Please identify all facts and assumptions that provide the basis for Mr. Potkin's testimony at A40 and identify the rates that were deemed to be below market as referenced in this

testimony. Please identify every document possessed or controlled by Entergy or Mr. Potkin that includes contrary conclusions or information tending to refute those claims, that was not prepared or submitted by a party to this proceeding.

117. Please identify every document possessed or controlled by Entergy or Mr. Potkin relevant to the demanded rates and the market rates referenced in Mr. Potkin's testimony at A40.
118. Please identify all facts and assumptions that provide the basis for the market conditions used to calculate the benefit of a new PPA as referenced in Mr. Potkin's testimony at A39. Please describe all assumptions used in that calculation, and identify every document possessed or controlled by Entergy or Mr. Potkin that includes contrary conclusions or information tending to refute those claims that was not prepared or submitted by a party to this proceeding.
119. Please identify every document relevant to ISO-NE's determination that Entergy VY is not necessary for system reliability as referenced in Mr. Potkin's testimony at A58
120. Please produce the Supplemental Information Notebook produced by TLG and the Decommissioning Cost Review Report.
121. Please produce the Entergy "life of the plant" contract between the State of Vermont and Entergy Solutions.
122. Please produce the contract governing dry storage canisters/casks.
123. Please produce any documents prepared by TLG discussing the differences and/or basis for the differences between the 2007 and 2012 decommissioning cost estimates referenced in Mr. Cloutier's prefiled testimony.
124. Please produce any and all documents identified, referred to, or relied upon in response to the preceding interrogatories.
125. Please produce any and all documents you expect to offer as exhibits at the technical hearing of this proceeding.

Dated at Montpelier, Vermont, this 27<sup>th</sup> day of July, 2012.

Respectfully submitted,

VERMONT DEPARTMENT  
OF PUBLIC SERVICE

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cc: Service List