

November 24, 2015

Nancy S. Malmquist Tel: (802) 748-8324 nmalmquist@drm.com

BY HAND DELIVERY

Mrs. Susan M. Hudson, Clerk Vermont Public Service Board 112 State Street Montpelier, VT 05620-2701

Re: Docket No. 8300: Petition of Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc., for a certificate of public good, pursuant to 30 V.S.A. § 248 and 10 V.S.A. § 6522, authorizing the construction of a second independent spent fuel storage installation storage pad and related improvements, including installation of a new diesel generator with an electrical rating of approximately 200 kW, at the Vermont Yankee Nuclear Power Station in the Town of Vernon, Vermont

Dear Mrs. Hudson:

On behalf of Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc. (together "Entergy VY"), by hand delivery we are filing at the Vermont Public Service Board ("Board") the discovery responses to the Third Set of Information Requests from:

- 1. Agency of Natural Resources ("ANR");
- 2. The Department of Public Service ("DPS"); and
- 3. The New England Coalition Inc. ("NEC").

We are also filing with the Board the non-privileged, non-confidential documents that are being produced in response to these requests and subject to Entergy VY's written responses and objections. We are also providing a copy of the filing on CD-ROM.

Entergy VY has identified certain responsive documents as Allegedly Confidential Information. Entergy VY is providing these documents to DPS and the Board under seal as Allegedly Confidential Information, subject to and in accordance with the Protective Agreement dated June 18, 2015 ("Protective Agreement") and the Protective Order to be issued by the Board in this docket. By separate mail, we will be providing an averment identifying this information and providing the basis for confidentiality.

By separate mail we will file with the Board the original of all affidavits signed by the persons responsible for preparing one or more of Entergy VY's written responses.

We certify that we have served via Federal Express two copies of this filing to each requesting party noted above and one copy to all remaining parties on the Service List. In addition, we have

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sent a copy of responses to all parties by electronic transmission. Many Attachments have been provided in hard copy form; however, in instances where the Attachments are voluminous, we have only provided them on CD-ROM.

Counsel to Entergy VY is prepared to work with each party's counsel who has difficulty opening or viewing any document produced in the Attachments identified in the written responses. Please contact my colleague Laura Bezio at (802) 258-3070 if you have difficulty accessing documents provided on the CD-ROMs.

Very truly yours,

DOWNS RACHLIN MARTIN PLLC Attorneys for Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc.

Bv

Nancy S. Malmquist John H. Marshall Daniel T. Crisp

c: Service List Timothy Ngau, Esq. Susan Raimo, Esq. Matthew B. Byrne, Esq. Matthew S. Stern, Esq. Leslie A. Cadwell, Esq.

Attachments

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PSB Docket No. 8300 Service List

Parties:

Aaron Kisicki, Esq., Special Counsel Public Service Department 112 State Street Montpelier, VT 05620-2601

Matthew B. Byrne, Esq. Matthew S. Stern, Esq. Gravel & Shea PC 76 St. Paul Street, 7th Floor, P.O. Box 369 Burlington, VT 05402-0369

John H. Marshall, Esq. Nancy S. Malmquist, Esq. Downs Rachlin Martin PLLC 90 Prospect Street, P.O. Box 99 St. Johnsbury, VT 05819-0099

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Jennifer S. Duggan, General Counsel Vermont Agency of Natural Resources Secretary's Office 1 National Life Drive, Davis 2 Montpelier, VT 05602-3901

Christopher Campany, *pro se* Windham Regional Commission 139 Main Street, Suite 505 Brattleboro, VT 05301 (For Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc.)

(For Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc.)

(For Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc.)

(For VT Agency of Natural Resources)

Clay Turnbull, *pro se* New England Coalition PO Box 545 139 Main Street, Suite 606E Brattleboro, VT 05302-0545

Christiane Howe, Chair, *pro se* Town of Vernon Selectboard 567 Governor Hunt Road Vernon, Vermont 05354

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