

seek information not reasonably calculated to lead to the discovery of admissible evidence; or (h) call for the review, compilation, or production of a voluminous number of documents at great expense to Entergy VY.

4. Entergy VY objects to the purported requirement that it identify the person who prepared each document produced and the date on which the document was prepared as being unduly burdensome and beyond the requirements of the discovery rules.

5. Entergy VY objects to any requests for documents or information beyond the scope of this tribunal's jurisdiction, including without limitation to the extent that (a) primary jurisdiction rests more properly with, and/or actually has been exercised by, another agency or tribunal, or (b) the document, legal issue or factual information in question has been otherwise determined by another agency or tribunal of competent jurisdiction.

6. Entergy VY objects to any request for documents or information relating to matters within the primary or exclusive jurisdiction of the U.S. Nuclear Regulatory Commission ("NRC"). Entergy VY will respond to DPS's requests herein noting its continued objection to the State of Vermont's assertion of jurisdiction over matters for which the federal government and the NRC have exclusive jurisdiction, including such exercise of its jurisdiction under Section 248 of Title 30, Vermont Statutes Annotated and Chapter 157 of Title 10, Vermont Statutes Annotated.

7. Each of these General Objections shall be incorporated by reference into the below-referenced objections and responses as if expressly restated therein. Entergy VY does not hereby waive any objections and reserves the right to later raise any additional, available objection.

Discovery Questions

Q.DPS:EN.3-1: Please produce the term sheets, and any and all supporting or related documents, from the lending institutions being considered in the establishment of the two separate revolving credit facilities totaling approximately \$145 million discussed on pages 2-3 of Mr. Twomey's rebuttal testimony dated May 11, 2015 and pages 11-12 of Exhibit EN-TMT-6.

A.DPS:EN.3-1: OBJECTION. By this reference, Entergy VY incorporates General Objection 6. Specifically, this request seeks information and production of documents related to Entergy VY's financial soundness and spent nuclear fuel management, which are within the federal government's and the NRC's primary or exclusive jurisdiction. Entergy VY further objects to this request as vague, overly broad, and unduly burdensome in that it seeks "all supporting or related documents." Additionally, Entergy VY objects to the extent that this request seeks the production of confidential or proprietary information without the entry of an appropriate protective order in place in this proceeding.

Without waiving its objections, Entergy VY responds:

Upon the entry of an appropriate Protective Order in this proceeding and subject to and in accordance with the terms of the June 18, 2015 Protective Agreement, Entergy VY will produce under seal, as confidential Attachment A.DPS:EN.3-1.1, a U.S. \$60,000,000 Credit Agreement, dated January 9, 2015 among Entergy Nuclear Vermont Yankee, LLC, as Borrower, Entergy Corporation, as Guarantor, the Banks Named Herein, as Banks, and Citibank, N.A., as Administrative Agent, and as confidential Attachment A.DPS:EN.3-1.2, a U.S. \$85,000,000 Uncommitted Line of Credit Agreement, dated January 9, 2015 among Entergy Nuclear Vermont Yankee, LLC, as Borrower, Entergy Corporation, as Guarantor, the Banks Named Herein, as Banks, and Citibank, N.A., as Administrative Agent.

Person Responsible for Response: T. Michael Twomey
Title: Vice President, External Affairs, EWC; Vice President, ENOI
Date: November 24, 2015

Q.DPS:EN.3-2: Please confirm that recoveries from the U.S. Department of Energy ("DOE") for breach of its contractual obligation to remove spent nuclear fuel from the Vermont Yankee site will be the exclusive source used for repayment of borrowings on the two separate revolving credit facilities totaling approximately \$145 million.

a. Please identify any and all credit facility repayment sources if DOE recoveries will not be the exclusive repayment source.

A.DPS:EN.3-2: OBJECTION. By this reference, Entergy VY incorporates General Objection 6. Specifically, this request seeks information and production of documents related to Entergy VY's financial soundness and spent nuclear fuel management, which are within the federal government's and the NRC's primary or exclusive jurisdiction. Entergy VY further objects to this request to the extent that it asks Entergy VY to speculate about actions it might take and/or the potential sources of funds that might be available if unexpected future developments and circumstances were to require a change from its current plans.

Without waiving its objections, Entergy VY responds:

Entergy VY expects to use recoveries from the U.S. Department of Energy ("DOE") for breach of its contractual obligation to remove spent fuel from the VY Station site as the exclusive source of funds to repay borrowings, as that term is defined under the credit facility agreements identified and produced in A.DPS:EN.3-1, under those agreements. Repayment of these borrowings is therefore not included in the nuclear decommissioning trust withdrawals reflected in the site specific decommissioning cost estimate and cash flow analysis that Entergy VY submitted to the NRC as the basis for its commingled-funds exemption request that the NRC approved (<http://vydecommissioning.com/wp-content/uploads/2015/06/ML15128A219.pdf>) and its Update to Irradiated Fuel Management Plan that the NRC Staff approved on a preliminary basis (<http://vydecommissioning.com/wp-content/uploads/2015/11/ML15292A256.pdf>).

Entergy VY expects to recover other costs related to spent nuclear fuel management from the nuclear decommissioning trust.

Person Responsible for Response: T. Michael Twomey
Title: Vice President, External Affairs, EWC; Vice President, ENOI
Date: November 24, 2015

Q.DPS:EN.3-3: Please identify and detail when Entergy expects to receive DOE recoveries as a result of its "Round 2" complaint, filed on April 24, 2014, to recover damages incurred after April 30, 2008.

A.DPS:EN.3-3: OBJECTION. By this reference, Entergy VY incorporates General Objection 6. Specifically, this request seeks information and production of documents related to Entergy VY's financial soundness and spent nuclear fuel management, which are within the federal government's and the NRC's primary or exclusive jurisdiction. Entergy VY further objects to this request as calling for speculation.

Without waiving its objections, Entergy VY responds:

Entergy VY expects to receive payment on its claims in its complaint filed on April 24, 2014, against the DOE for breach of DOE's contractual obligation to remove spent nuclear fuel from the VY Station site by the first half of 2017 if there are no appeals filed from the trial court's judgment.

Person Responsible for Response: T. Michael Twomey
Title: Vice President, External Affairs, EWC; Vice President, ENOI
Date: November 24, 2015

Q.DPS:EN.3-4: Please identify any and all funding sources Entergy will utilize, prior to anticipated DOE recovery, to make up for any difference in the approximately \$145 million available for second ISFSI pad construction, procurement of dry storage systems, and/or transfer of spent fuel to the ISFSI through the two above-identified credit facilities if the uncommitted facility with a capacity of \$85 million, or any portion thereof, is suspended or canceled.

A.DPS:EN.3-4: OBJECTION. By this reference, Entergy VY incorporates General Objection 6. Specifically, this request seeks information and production of documents related to Entergy VY's financial soundness and spent nuclear fuel management, which are within the federal government's and the NRC's primary or exclusive jurisdiction. Entergy VY further objects to this request as calling for speculation. Additionally, Entergy VY objects to the extent that this request seeks the production of confidential or proprietary information without the entry of an appropriate protective order and protective agreement in place in this proceeding.

Without waiving its objections, Entergy VY responds:

There is no reason to expect that any or all of the \$85 million uncommitted credit facility will be suspended or canceled. Entergy VY also notes that Section 2(d) of the \$60 million committed credit agreement provides Entergy VY the option to increase the aggregate amount that it can borrow above \$60 million.

Person Responsible for Response: T. Michael Twomey
Title: Vice President, External Affairs, EWC; Vice President, ENOI
Date: November 24, 2015

Q.DPS:EN.3-5: Page 11 of Mr. Thomas' rebuttal testimony dated October 21, 2015 states that locating an ISFSI west of the Vernon Substation would "create problems complying with the radiation dose limits for members of the public, 10 C.F.R. 72.104, and . . . the Vermont Department of Health's more stringent requirement in its Radiological Health Rule, Section 5-305(D)(1)(e)." Please produce the radiological dose engineering calculations made to support this conclusion, and any and all documents related to or in support of the calculations.

A.DPS:EN.3-5: OBJECTION. The request seeks the production of confidential and propriety information of Entergy VY's vendor, Holtec International. Upon the entry of an appropriate protective order in this proceeding and subject to and in accordance with the terms of the June 18, 2015 Protective Agreement, Entergy VY will make the report of Holtec International's radiological dose engineering calculations available for inspection, subject to the consent of Holtec International and the restrictions and procedures required by Holtec International.

Without waiving its objections, Entergy VY responds:

At the time that the location of the second ISFSI pad was selected, there were concerns that locating an ISFSI along the west edge of the VY Station site would result in elevated radiation levels (as compared to the chosen location) at the residential properties located along Governor Hunt Road. Subsequent to site selection, Holtec International provided a report of the radiation dose rates as a function of distance from the chosen location of the ISFSI pad that confirmed that locating an ISFSI west of the Vernon Substation would result in unacceptable radiation dose rates at those properties.

Person Responsible for Response: George Thomas
Title: Senior Project Manager
Date: November 24, 2015

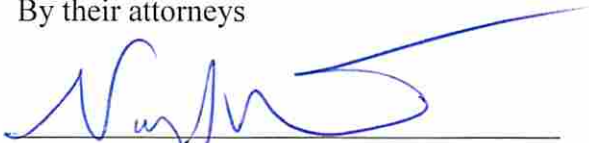
As to objections where responsive information was provided over stated objections:

St. Johnsbury, Vermont. November 24, 2015.

Respectfully submitted,

ENTERGY NUCLEAR VERMONT
YANKEE, LLC, AND ENTERGY
NUCLEAR OPERATIONS, INC.

By their attorneys



DOWNS RACHLIN MARTIN PLLC
John H. Marshall
Nancy S. Malmquist
Daniel T. Crisp, IV

and

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

Leslie A. Cadwell
Leslie A. Cadwell – Legal Counselor &
Advocate, PLC
751 Frisbie Hill Road
Castleton, VT 05735