

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Joint Petition of NorthStar Decommissioning)	
Holdings, LLC, NorthStar Nuclear)	
Decommissioning Company, LLC, NorthStar)	
Group Services, Inc., LVI Parent Corp.,)	
NorthStar Group Holdings, LLC, Entergy)	
Nuclear Vermont Investment Company, LLC,)	
and Entergy Nuclear Operations, Inc., and)	Docket No. 8880
any other necessary affiliated entities to)	
transfer ownership of Entergy Nuclear)	
Vermont Yankee, LLC, and for certain)	
ancillary approvals, pursuant to 30 V.S.A.)	
§§ 107, 231, and 232)	

JOINT PETITIONERS' MOTION FOR ADOPTION OF SCHEDULE

Joint Petitioners NorthStar Decommissioning Holdings, LLC, NorthStar Group Holdings, LLC, LVI Parent Corp., NorthStar Group Services, Inc., NorthStar Nuclear Decommissioning Company, LLC, Entergy Nuclear Vermont Investment Company, LLC, and Entergy Nuclear Operations, Inc., by their attorneys, respectfully submit this motion requesting that the Commission adopt the schedule contained herein to govern this Docket.

On January 12, 2018, the Commission issued a Procedural Order that, *inter alia*, postponed the technical hearing scheduled for the weeks of January 22 and 29. The Commission ordered the parties to submit, by noon on January 24, 2018, a status report concerning the parties' progress toward a memorandum of understanding ("MOU") or settlement agreement. The Commission also identified certain dates on which the Commission could be available for rescheduled hearings: February 15, 16, 20, 21, 22, and 23.

As of today, no MOU or settlement agreement has yet been signed. Joint Petitioners are hopeful that such a signing will occur within a short period of time, but it is also possible that negotiations will break down.

Accordingly, Joint Petitioners respectfully submit that the Commission should consider two alternative schedules for technical hearings: one for the scenario in which at minimum Joint Petitioners and State agencies, and potentially one or more other parties, sign a MOU or settlement agreement, and a second for the scenario in which negotiations break down and a fully contested technical hearing must be held. Joint Petitioners further submit that the Commission should set Thursday, February 1, 2018 as the date by which a MOU or settlement agreement must be signed and filed with the Commission, such that the choice between the two schedules can be made as of that date.

MOU/Settlement Agreement Track Schedule. Joint Petitioners respectfully propose the following schedule, in which each event is measured from a start date that is the filing of the MOU or settlement agreement among the Joint Petitioners and State agencies, as follows:

Start date (but no later than Feb. 1, 2018): File MOU or settlement agreement.

+2 business days: MOU/settlement signing parties file supplemental prefiled testimony concerning MOU or settlement agreement.

+7 business days:¹ Parties file discovery requests.

+12 business days: Parties respond to discovery requests.

+22 business days: Non-MOU/settlement signing parties file supplemental prefiled testimony.

+27 business days: Technical hearing begins.

+41 business days: Post-hearing briefs/proposals for decision.

¹ All “+ ” measurements are from a starting date of the filing of the MOU or settlement agreement. Thus, for example, if the MOU or settlement agreement were filed on February 1, 2018, then the “+17 business days” for the filing of discovery requests would be February 26, 2018.

On or before June 30, 2018: Decision by the Commission

Fully Contested Track. The previous schedule, entered August 22, 2017, had provided for ten full hearing days.

Joint Petitioners thus respectfully move the Commission to schedule ten days of evidentiary hearings, including on February 20, 21, 22, and 23, dates on which the Commission indicated it would be available. Joint Petitioners request that the Commission additionally schedule hearing days on February 26, 27, 28, March 1, 2, and 5, or other proximate dates depending upon the Commission's availability.² Post-hearing filing dates can be determined once the Commission has set the hearing schedule, but Joint Petitioners respectfully request a decision from the Commission on Docket 8880 on or before June 30, 2018.

DATED at New York, New York, this 24th day of January, 2018.

Respectfully submitted,

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By: 

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² In the event that Vermont school vacation during the weeks of February 19 and/or 26 prevent counsel of record or their law partners or colleagues from proceeding during those weeks, Joint Petitioners respectfully suggest that the Commission schedule the technical hearing for the following dates, or proximate ones depending upon the Commission's availability: March 6, 7, 8, 9, 12, 13, 14, 15, 16, and 19.

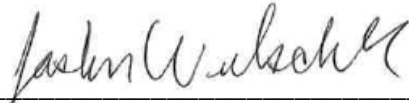
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