A: Yes. I am concerned that the funds available for decommissioning Vermont Yankee are insufficient.

Q: Please explain your concerns about the adequacy of Vermont Yankee's decommissioning funds.

A: The decommissioning fund is not sufficient to account for known uncertainties, including the possible early shutdown of the plant, escalation in decommissioning costs, and poor investment returns. Based on recent experiences, there is a non-trivial risk that Vermont Yankee would need to close abruptly during the life-extension period. For example, in early January 2009, Vermont Yankee experienced two leaks of radioactive water within two days. Vermont Yankee's overall performance compared to the industry moved from between the top and median quartile through 2006 to the bottom quartile for 2008. Poor investment returns would also dramatically reduce the value of the decommissioning fund compared to expectations, as we have seen over the last year. Use of decommissioning funds for spent fuel storage or other uses as Entergy has proposed, would also limit the funds available for decommissioning. If Vermont Yankee is left with insufficient decommissioning funds and no source of revenues or additional funding, the state of Vermont will be burdened with costs that are not reflected in Entergy's proposal. At a minimum, Vermont would bear the nuclear equivalent of a junk car in its back yard. It would bear the environmental and economic cost of a plant that is not in operation and is not decommissioned. Those risks and costs must be incorporated in the economic analysis for the

---

Board to ensure that the continued operation of Vermont Yankee will promote the general good of Vermont.

Q: Have any other US nuclear power plants shut down prior to the end of their operating licenses?

A: Yes. This was the case for most or all of the small (less-than-500-MW) nuclear units, such as Massachusetts Yankee. The following commercial-size (greater-than-400-MW) units retired before the end of their licenses:

- San Onofre 1
- Maine Yankee
- Connecticut Yankee
- Millstone 1
- Zion 1 and 2
- Trojan
- Rancho Seco
- Three Mile Island 2

These early retirements comprise about 8% of all the commercial-size units built in the US and about 20% of those units that entered service through 1973. Vermont Yankee entered service in 1972.

Q: What would constitute adequate decommissioning funding in this proceeding?

---

2 Vermont Yankee is one of the smallest of the commercial-sized units.

3 Several other smaller commercial plants—including Massachusetts Yankee, Dresden 1, Indian Point 1, Humboldt Bay, and LaCrosse—were also retired early.