

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE COMMISSION

)	
In the Matter of)	
)	Docket No. 63-001 – HLW
U.S. DEPARTMENT OF ENERGY)	
)	September 30, 2013
(High-Level Waste Repository:)	
Pre-Application Matters))	
)	

**EUREKA COUNTY’S RESPONSE TO
NRC SECRETARY’S AUGUST 30, 2013 ORDER**

As permitted by the August 30, 2013, Order of the Secretary of the U.S. Nuclear Regulatory Commission (“NRC”), Eureka County submits its views regarding the actions NRC should take in response to the U.S. Court of Appeals’ recent decision that NRC must resume the Yucca Mountain proceeding, albeit with a limited fund of \$11.1 million. *In re Aiken County*, No. 11-1271 (August 13, 2013). Eureka County advocates the following actions, in order of their priority:

- Hold a conference of the parties and the Atomic Safety and Licensing Board (“ASLB”) in Las Vegas;
- Ensure that the conference is webcast, and that out-of-town counsel can participate remotely;
- Restore the Licensing Support Network (“LSN”) document collection; and
- If sufficient funds remain to conduct a full and fair hearing on safety issues, complete and issue Volume 3 of the Safety Evaluation Report (“SER”).

Eureka County notes that its fourth bulleted recommendation above is conditional: completion of the SER should be contingent on the existence of sufficient funding to hold a hearing on the issues covered in the SER.

In the interest of conserving the parties’ and NRC’s resources, Eureka County also supports the recommendation by the State of Nevada that the Commission should postpone a

ruling on this issue until the U.S. Court of Appeals rules on its pending petition for rehearing *en banc*.¹

BACKGROUND

Pursuant to 10 C.F.R. § 2.315(c), Eureka County has been admitted to participate in this proceeding as an interested governmental body.² As permitted by the hearing notice in this proceeding and a subsequent clarifying order, the County has provided notice of its intent to participate with respect to a range of issues related to emergency response, transportation (including sabotage), repository safety and environmental impacts, seismic and volcanic risks, and alternative waste storage and land ownership.³

Throughout the proceeding, Eureka County has advocated the establishment of measures to enable full public participation and observation of Yucca Mountain-related proceedings. As a county government located hundreds of miles from Las Vegas, for instance, Eureka County successfully petitioned the NRC to webcast a case management conferences in Las Vegas, so that Eureka County officials could participate and observe them remotely.⁴ In response to a petition by Eureka County, the ASLB also allowed out-of-town counsel to participate by videoconference in a subsequent case management conference held in Las Vegas.⁵

Eureka County also has sought to ensure that any technical review documents prepared by the NRC regarding the merits of the proposed Yucca Mountain repository will be subject to a

¹ State of Nevada Comments in Response to the Secretary's August 30, 2013 Order (Sept. 30, 2013).

² *U.S. Department of Energy (High-Level Waste Repository)*, LBP-09-6, 69 NRC 367, 377 (2009).

³ *See* Commission Order (Jan. 15, 2009); Eureka County's Notice Regarding Contentions on which it Intends to Participate (June 23, 2009).

⁴ *See* Order (Terms, Logistics and Questions for Oral Argument), App. D at 4 (Mar. 18, 2009).

⁵ *See* Order (Granting Motion to Participate by Videoconference and Request for Webcasting) (Aug. 25, 2009).

full and fair hearing. Thus, after the U.S. Department of Energy (“DOE”) filed a motion to withdraw the Yucca Mountain license application in 2010 and it therefore appeared that the hearing would be suspended, Eureka County supported a petition by the State of Nevada to suspend the completion and issuance of the final volume of the SER (Vol. 3).⁶ Eureka County noted its interest in “preventing the issuance of any further government analyses regarding the safety of the proposed Yucca Mountain repository if there is no prospect that those analyses will be subject to the rigors of an adjudicatory hearing.”⁷ By supporting Nevada’s petition, Eureka County sought to avoid the harm to its interests that might be caused “by providing decision-makers and the public with untested and incorrect information about the post-closure risks posed by the repository.”⁸

The NRC did not issue Volume 3 of the SER. In recent pleadings, some of the parties now are requesting the NRC to complete and issue it, whether or not sufficient funds are available for the hearing itself. But Eureka County remains concerned that its interest in the safety of the proposed repository would be compromised if the NRC issued the SER without also ensuring that its assumptions, analyses and conclusions could be tested in a public hearing.

DISCUSSION

Eureka County respectfully submits that ensuring a full and fair public hearing on the adequacy of the Yucca Mountain license application should be the NRC’s paramount objective in deciding on its priorities for resumption of this proceeding. The first action taken by NRC, therefore, should be a case management meeting between the ASLB and parties, to discuss next

⁶ See Clark County, Nevada’s and Eureka County, Nevada’s Answer in Support of State of Nevada’s Petition for Relief With Respect to Possible Issuance of a Partial Safety Evaluation Report for Yucca Mountain (June 24, 2010).

⁷ *Id.* at 2.

⁸ *Id.*

steps in the litigation. The meeting should be held in Las Vegas in order to maximize the opportunity to participate and observe it by affected members of the public.

In addition, recognizing that Eureka County and some other local government participants are located a great distance from Las Vegas, the NRC should maintain its previous commitment to webcast all Yucca Mountain conferences and to make them remotely accessible to out-of-town counsel. While a telephone connection would be acceptable, videoconferencing is preferable.

Third, the NRC should restore the LSN collection or its equivalent in a searchable format. While some parties have argued that restoration of the LSN collection is not necessary, it does not appear that any reasonable equivalent exists. The DOE now houses what is left of the LSN collection. As discussed in a recent report by the U.S. Nuclear Waste Technical Review Board (“TRB”), the LSN documents housed at the DOE are not readily obtainable, but instead must be requested through the Freedom of Information Act (“FOIA”).⁹ In order to permit a meaningful opportunity for access to these discovery documents by the parties and other interested members of the public, therefore, the NRC would need to retrieve the collection from the DOE and post it on the NRC’s website in an accessible format. Under the circumstances, the NRC must reconstitute the LSN in order to allow meaningful discovery. The NRC should also provide a reasonable opportunity for all parties to update the LSN collection.

Finally, *if* sufficient funds remain to conduct a hearing on the issues discussed in the SER, the SER should be completed. In order to ensure that the SER can be evaluated in a public

⁹ See Cover letter from Rodney C. Ewing to Hon. John Boehner et al., enclosing Review of the U.S. Department of Energy Activities to Preserve Records Created by the Yucca Mountain Repository Project (August 2013).

hearing, however, no steps should be taken to finish or issue the SER unless the availability of sufficient funds for a hearing is confirmed.

CONCLUSION

For the foregoing reasons, the NRC should take the following actions, which are set forth in the order of their priority:

- Hold a conference of the parties and the ASLB in Las Vegas;
- Ensure that the conference is webcast, and that out-of-town counsel can participate remotely;
- Restore the Licensing Support Network (“LSN”) document collection; and
- If sufficient funds remain to conduct a full and fair hearing on safety issues, complete and issue Volume 3 of the SER.

Respectfully submitted,

/s/Diane Curran

Diane Curran

Harmon, Curran, Spielberg, & Eisenberg, L.L.P.

1726 M Street N.W., Suite 600

Washington, D.C. 20036

202/328-3500

FAX 202/328-6918

dcurran@harmoncurran.com

September 30, 2013

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2013, copies of the foregoing Eureka County's Response to NRC Secretary's August 30, 2013 Notice were served upon the following persons by Electronic Information Exchange:

U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board (ASLBP)
Mail Stop T-3F23
Washington, DC 20555-0001

CAB 01

William J. Froehlich, Chair
Administrative Judge
wjf1@nrc.gov

Thomas S. Moore
Administrative Judge
tsm2@nrc.gov

Richard E. Wardwell
Administrative Judge
rew@nrc.gov

CAB 02

Michael M. Gibson, Chair
Administrative Judge
mmg3@nrc.gov

Alan S. Rosenthal
Administrative Judge
axr@nrc.gov or rsnthl@verizon.net

Nicholas G. Trikouros
Administrative Judge
ngt@nrc.gov

CAB 03

Paul S. Ryerson, Chair
Administrative Judge
psr1@nrc.gov

Michael C. Farrar
Administrative Judge
mcf@nrc.gov

Mark O. Barnett
Administrative Judge
mob1@nrc.gov or mark.barnett@nrc.gov

ASLBP (continued)

CAB 04

Thomas S. Moore, Chair
Administrative Judge
tsm2@nrc.gov

Paul S. Ryerson
Administrative Judge
psr1@nrc.gov

Richard E. Wardwell
Administrative Judge
rew@nrc.gov

Anthony C. Eitrem, Esq., Chief Counsel

ace1@nrc.gov

Daniel J. Graser, LSN Administrator

djg2@nrc.gov

Lauren Bregman, Law Clerk

lrb1@nrc.gov

Zachary Kahn, Law Clerk

zxk1@nrc.gov

Erica LaPlante, Law Clerk

ea1@nrc.gov

Matthew Rotman, Law Clerk

matthew.rotman@nrc.gov

Joseph Deucher

jhd@nrc.gov

Andrew Welkie

axw5@nrc.gov

Jack Whetstine

jgw@nrc.gov

Patricia Harich

patricia.harich@nrc.gov

Sara Culler

sara.culler@nrc.gov

U.S. Nuclear Regulatory Commission
Office of the Secretary of the Commission
Mail Stop O-16C1
Washington, DC 20555-0001
Hearing Docket
hearingdocket@nrc.gov

U.S. Department of Energy
Office of General Counsel
1000 Independence Avenue S.W.
Washington, DC 20585
Martha S. Crosland, Esq.
martha.crosland@hq.doe.gov
Nicholas P. DiNunzio, Esq.
nick.dinunzio@rw.doe.gov
James Bennett McRae
ben.mcrae@hq.doe.gov
Cyrus Nezhad, Esq.
cyrus.nezhad@hq.doe.gov
Christina C. Pak, Esq.
christina.pak@hq.doe.gov
Michelle Albert
michelle.Albert@nrc.gov

U.S. Nuclear Regulatory Commission
Office of Commission Appellate Adjudication
Mail Stop O-16C1
Washington, DC 20555-0001
OCAA Mail Center
ocaamail@nrc.gov

For U.S. Department of Energy
Office of Counsel, Naval Sea Systems Command
Nuclear Propulsion Program
1333 Isaac Hull Avenue, SE
Washington Navy Yard, Building 197
Washington, DC 20376
Frank A. Putzu, Esq.
frank.putzu@navy.mil

U.S. Nuclear Regulatory Commission
Office of the General Counsel
Mail Stop O-15D21
Washington, DC 20555-0001
Karin Francis, Paralegal
kxf4@nrc.gov
Joseph S. Gilman, Paralegal
jsq1@nrc.gov
Daniel W. Lenehan, Esq.
dwl2@nrc.gov
Mitzi A. Young, Esq.
may@nrc.gov
Marian L. Zabler, Esq.
mlz@nrc.gov
Jessica A. Bielecki
Jessica.Bielecki@nrc.gov
Elva Bowden Berry
elva.bowdenberry@nrc.gov
OGC Mail Center
OGCMailCenter@nrc.gov

U.S. Department of Energy
Office of General Counsel
1551 Hillshire Drive
Las Vegas, NV 89134-6321
Jocelyn M. Gutierrez, Esq.
jocelyn.gutierrez@ymp.gov
George W. Hellstrom, Esq.
george.hellstrom@ymp.gov
Josephine L. Sommer, Paralegal
josephine.sommer@ymp.gov

For U.S. Department of Energy
USA-Repository Services
Yucca Mountain Project Licensing Group
1160 N. Town Center Drive, Suite 240
Las Vegas, NV 89144
Stephen J. Cereghino, Licensing/Nucl Safety
stephen_cereghino@ymp.gov
Jeffrey Kriner, Regulatory Programs
jeffrey_kriner@ymp.gov

For U.S. Department of Energy
Talisman International, LLC
1000 Potomac St., NW, Suite 300
Washington, DC 20007
Patricia Larimore, Senior Paralegal
plarimore@talisman-intl.com

Counsel for U.S. Department of Energy
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004
Clifford W. Cooper, Paralegal
cocooper@morganlewis.com
Lewis M. Csedrik, Esq.
lcshedrik@morganlewis.com
Jay M. Gutierrez, Esq.
jgutierrez@morganlewis.com
Charles B. Moldenhauer, Esq.
cmoldenhauer@morganlewis.com
Brian P. Oldham, Esq.
boldham@morganlewis.com
Thomas D. Poindexter, Esq.
tpoindexter@morganlewis.com
Alex S. Polonsky, Esq.
apolonsky@morganlewis.com
Thomas A. Schmutz, Esq.
tschmutz@morganlewis.com
Donald J. Silverman, Esq.
dsilverman@morganlewis.com
Shannon Staton, Legal Secretary
sstaton@morganlewis.com

For U.S. Department of Energy
USA-Repository Services
Yucca Mountain Project Licensing Group
6000 Executive Boulevard, Suite 608
North Bethesda, MD 20852
Edward Borella, Sr Staff, Licensing/Nuclear Safety
edward_borella@ymp.gov

MICHAEL L. DUNNING
Assistant Attorney General
State of Washington
Office of the Attorney General
PO Box 40117
Olympia, WA 98504-0117
(360) 586-6741
Fax: (360) 586-6760
MichaelD@atg.wa.gov
H. Lee Overton
Assistant Attorney General
LeeO1@atg.wa.gov
ANDREW A. FITZ
Senior Counsel
AndyF@atg.wa.gov
TODD R. BOWERS
toddb@atg.wa.gov

Counsel for U.S. Department of Energy
Hunton & Williams LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219
Kelly L. Faglioni, Esq.
kfaglioni@hunton.com
Donald P. Irwin, Esq.
dirwin@hunton.com
Stephanie Meharg, Paralegal
smeharg@hunton.com
Michael R. Shebelskie, Esq.
mshebelskie@hunton.com
Belinda A. Wright, Sr. Professional Assistant
bwright@hunton.com

Annette M. White, Esq.
Annette.white@morganlewis.com
Paul J. Zaffuts, Esq.
pzaffuts@morganlewis.com

Counsel for State of Nevada
Egan, Fitzpatrick, Malsch & Lawrence, PLLC
1777 N.E. Loop 410, Suite 600
San Antonio, TX 78217
Martin G. Malsch, Esq.
mmalsch@nuclearlawyer.com
Susan Montesi:
smontesi@nuclearlawyer.com

Nevada Agency for Nuclear Projects
Nuclear Waste Project Office
1761 East College Parkway, Suite 118
Carson City, NV 89706
Steve Frishman, Tech. Policy Coordinator
steve.frishman@gmail.com
Susan Lynch, Administrator of Technical Prgms
szeeee@nuc.state.nv.us

Counsel for Lincoln County, Nevada
1100 S. Tenth Street
Las Vegas, NV 89017
Annie Bailey, Legal Assistant
baileys@lcturbonet.com
Bret Whipple, Esq.
bretwhipple@nomademail.com

Lincoln County Nuclear Oversight Program
P.O. Box 1068
Caliente, NV 89008
Connie Simkins, Coordinator
jcciac@co.lincoln.nv.us

Counsel for Nye County, Nevada
Ackerman Senterfitt
801 Pennsylvania Avenue, NW, #600
Washington, DC 20004
Robert Andersen, Esq.
robert.andersen@akerman.com

Counsel for State of Nevada
Egan, Fitzpatrick, Malsch & Lawrence, PLLC
12500 San Pedro Avenue, Suite 555
San Antonio, TX 78216
Laurie Borski, Paralegal
lborski@nuclearlawyer.com
Charles J. Fitzpatrick, Esq.
cfitzpatrick@nuclearlawyer.com
John W. Lawrence, Esq.
jlawrence@nuclearlawyer.com

Bureau of Government Affairs
Nevada Attorney General
100 N. Carson Street
Carson City, NV 89701
Marta Adams, Chief Deputy Attorney General
madams@ag.nv.gov

Lincoln County District Attorney
P. O. Box 60
Pioche, NV 89403
Gregory Barlow, Esq.
lcd@lcturbonet.com

For Lincoln County, Nevada
Intertech Services Corporation
PO Box 2008
Carson City, NV 89702
Mike Baughman, Consultant
bigboff@aol.com
<http://www.lvrj.com/news/yucca-project-assailed-82773357.html>

Nye County Regulatory/Licensing Advisor
18160 Cottonwood Rd. #265
Sunriver, OR 97707
Malachy Murphy, Esq.
mrmurphy@chamberscable.com

Nye County Nuclear Waste Repository Project
Office (NWRPO)
1210 E. Basin Road, #6
Pahrump, NV 89060
Zoie Choate, Secretary
zchoate@co.nye.nv.us
Sherry Dudley, Admin. Technical Coordinator
sdudley@co.nye.nv.us

Clark County, Nevada
500 S. Grand Central Parkway
Las Vegas, NV 98155
Phil Klevorick, Sr. Mgmt Analyst
klevorick@co.clark.nv.us
Elizabeth A. Vibert, Deputy District Attorney
Elizabeth.Vibert@ccdavn.com

Counsel for Eureka County, Nevada
Harmon, Curran, Spielberg & Eisenberg, LLP
1726 M. Street N.W., Suite 600
Washington, DC 20036
Diane Curran, Esq.
dcurran@harmoncurran.com

For Eureka, Lander, Churchill, Mineral &
Esmeralda County's, Nevada
NWOP Consulting, Inc.
1705 Wildcat Lane
Ogden, UT 84403
Loreen Pitchford, Consultant
lpitchford@comcast.net

Nuclear Waste Advisory for Eureka
County, Nevada
1983 Maison Way
Carson City, NV 89703
Abigail Johnson, Consultant
eurekanrc@gmail.com

Counsel for Clark County, Nevada
Jennings, Strouss & Salmon
1350 I Street NW, Suite 810
Washington, DC 20005-3305
ebelete@jsslw.com
Alan I. Robbins, Esq.
arobbins@jsslw.com
Debra D. Roby, Esq.
drobby@jsslw.com
Alan J. Rukin
ARukin@jsslw.com

Eureka County, Nevada
Office of the District Attorney
701 S. Main Street, Box 190
Eureka, NV 89316-0190
Theodore Beutel, District Attorney
tbeutel.ecda@eurekanv.org

Eureka County Public Works
PO Box 714
Eureka, NV 89316
Ronald Damele, Director
rdamele@eurekanv.org

DAVIDSON & LINDEMANN, P.A.
1611 Devonshire Drive
P. O. Box 8568
Columbia, SC 29202
Kenneth P. Woodington

Counsel for Churchill, Esmeralda, Lander,
and Mineral Counties, Nevada
Armstrong Teasdale, LLP
1975 Village Center Circle, Suite 140
Las Vegas, NV 89134-6237
Jennifer A. Gores, Esq.
jgores@armstrongteasdale.com
Robert F. List, Esq.
rlist@armstrongteasdale.com

Esmeralda County Repository Oversight Program-
Yucca Mountain Project
PO Box 490
Goldfield, NV 89013
Edwin Mueller, Director
muellered@msn.com

Mineral County Nuclear Projects Office
P.O. Box 1600
Hawthorne, NV 89415
Linda Mathias, Director
yuccainfo@mineralcountynv.org

For City of Caliente, Lincoln County, and
White Pine County, Nevada
P.O. Box 126
Caliente, NV 89008
Jason Pitts, LSN Administrator
jayson@idtservices.com

White Pine County, Nevada
Office of the District Attorney
801 Clark Street, #3
Ely, NV 89301
Richard Sears, District Attorney
rwsears@wpcda.org

White Pine County Nuclear Waste Project Office
959 Campton Street
Ely, NV 89301
Mike Simon, Director
wpnucwst1@mwpower.net

Counsel for Inyo County, California
Berger, Silverman & Gephart
233 E. Carrillo Street, Suite B
Santa Barbara, CA 93101
Michael Berger, Esq.
mberger@bsqlaw.net
Robert Hanna, Esq.
rshanna@bsqlaw.net

Counsel for Caliente Hot Springs Resort LLC
John H. Huston, Attorney at Law
6772 Running Colors Avenue
Las Vegas, NV 89131
John H. Huston, Esq.
johnhhuston@gmail.com

Inyo County Yucca Mountain Repository
Assessment Office
P. O. Box 367
Independence, CA 93526-0367
Alisa M. Lembke, Project Analyst
alembke@inyocounty.us

Gregory L. James
Attorney for the County of Inyo
712 Owens Gorge Road
HC 79, Box 11
Mammoth Lakes, California 93546
Telephone: (760) 935-4148
Facsimile: (760) 935-4840
Email: gljames@earthlink.net

California Department of Justice
Office of the Attorney General
1300 I Street, P.O. Box 944255
Sacramento, CA 94244-2550
Susan Durbin, Deputy Attorney General
susan.durbin@doj.ca.gov
Michele Mercado, Analyst
michele.Mercado@doj.ca.gov

California Department of Justice
Office of the Attorney General
1515 Clay Street, 20th Floor, P.O. Box 70550
Oakland, CA 94612-0550
Timothy E. Sullivan, Deputy Attorney General
timothy.Sullivan@doj.ca.gov

California Department of Justice
300 S. Spring Street, Suite 1702
Los Angeles, CA 90013
Brian Hembacher, Deputy Attorney General
brian.hembacher@doj.ca.gov

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Kevin, W. Bell, Senior Staff Counsel
kwbell@energy.state.ca.us

Nuclear Energy Institute
Office of the General Counsel
1776 I Street, NW Suite 400
Washington, DC 20006-3708
Michael A. Bauser, Esq.
mab@nei.org
Anne W. Cottingham, Esq.
awc@nei.org
Ellen C. Ginsberg, Esq.
ecg@nei.org

Counsel for Nuclear Energy Institute
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037-1122
Jay E. Silberg, Esq.
jay.silberg@pillsburylaw.com
Timothy J.V. Walsh, Esq.
timothy.walsh@pillsburylaw.com
Maria D. Webb, Senior Energy Legal Analyst
maria.webb@pillsburylaw.com

Counsel for Nuclear Energy Institute
Winston & Strawn LLP
1700 K Street, N.W.
Washington, DC 20006-3817
William A. Horin, Esq.
whorin@winston.com
Rachel Miras-Wilson, Esq.
rwilson@winston.com
David A. Repka, Esq.
drepka@winston.com
Carlos L. Sisco, Senior Paralegal
csisco@winston.com

Aiken County, South Carolina
Thomas R. Gottshall
tgottshall@hsblawfirm.com
Haynesworth Sinkler Boyd, PA
1201 Main Street, Suite 2200
Post Office Box 11889
Columbia, SC 29211-1889
S. Ross Shealy
rshealy@hsblawfirm.com

Native Community Action Council
P.O. Box 140
Baker, NV 89311
Ian Zabarte, Member of Board of Directors
mrizabarte@gmail.com

Counsel for Native Community Action Council
Alexander, Berkey, Williams & Weathers LLP
2030 Addison Street, Suite 410
Berkeley, CA 94704
Curtis G. Berkey, Esq.
cberkey@abwwlaw.com
Rovianne A. Leigh, Esq.
rleigh@abwwlaw.com
Scott W. Williams, Esq.
swilliams@abwwlaw.com

For Joint Timbisha Shoshone Tribal Group
3560 Savoy Boulevard
Pahrump, NV 89601
Joe Kennedy, Executive Director
joekennedy08@live.com
Tameka Vazquez, Bookkeeper
purpose_driven12@yahoo.com

Counsel for Joint Timbisha Shoshone Tribal Group
Fredericks, Peebles, & Morgan LLP
1001 Second St.
Sacramento, CA 95814
Felicia M. Brooks, Data Administrator
fbrooks@ndnlaw.com
Ross D. Colburn, Law Clerk
rcolburn@ndnlaw.com
Sally Eredia, Legal Secretary
seredia@ndnlaw.com
Darcie L. Houck, Esq.
dhouck@ndnlaw.com
Brian Niegemann, Office Manager
bniegemann@ndnlaw.com
John M. Peebles, Esq.
jpeebles@ndnlaw.com
Robert Rhoan, Esq.
rrhoan@ndnlaw.com
Shane Thin Elk, Esq.
sthinelk@ndnlaw.com

Counsel for Joint Timbisha Shoshone Tribal Group
Godfrey & Kahn, S.C.
One East Main Street, Suite 500
P. O. Box 2719
Madison, WI 53701-2719
Julie Dobie, Legal Secretary
jdobie@gklaw.com
Steven A. Heinzen, Esq.
sheinzen@gklaw.com
Douglas M. Poland, Esq.
dpoland@gklaw.com
Hannah L. Renfro, Esq.
hrenfro@gklaw.com
Jacqueline Schwartz, Paralegal
jschwartz@gklaw.com

Counsel for Joint Timbisha Shoshone Tribal Group
Godfrey & Kahn, S.C.
780 N. Water Street
Milwaukee, WI 53202
Arthur J. Harrington, Esq.
aharrington@gklaw.com

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
Cynthia Miller
cmiller@psc.state.fl.us

PRAIRIE ISLAND INDIAN COMMUNITY
Philip R. Mahowald, General Counsel
Prairie Island Indian Community Legal Department
5636 Sturgeon Lake Road
Welch, MN 55089
pmahowald@piic.org
Don L. Keskey
Public Law Resource Center PLLC
505 N. Capitol Avenue
Lansing, MI 48933
donkeskey@publiclawresourcenter.com

Signed electronically by
Diane Curran