

August 30, 2013

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE COMMISSION

In the Matter of:)
) Docket No. 63-001-HLW
U.S. Department of Energy)
(High Level Waste Repository))
)

**NUCLEAR ENERGY INSTITUTE’S ANSWER TO MOTIONS CONCERNING
RESUMPTION OF YUCCA MOUNTAIN LICENSING ACTIVITIES**

Pursuant to 10 C.F.R. § 2.323(c), the Nuclear Energy Institute (“NEI”) hereby answers the August 23, 2013 motions filed by Nye County, Nevada¹ and the State of Nevada² concerning the possible resumption of Yucca Mountain licensing activities in light of the August 13, 2013 decision by the United States Court of Appeals for the District of Columbia Circuit (the “Court” or the “D.C. Circuit”) to issue a writ of mandamus.³ In *Aiken*, the Court (1) found that the Nuclear Regulatory Commission (“NRC” or “Commission”) “has at least \$11.1 million in appropriated funds to continue consideration of the [Yucca Mountain repository] license application,” and (2) held that “unless and until Congress authoritatively says otherwise or there are no appropriated funds remaining, the [NRC] must promptly continue with the legally

¹ Nye County’s Motion for Lifting of Suspension of Yucca Mountain Licensing Proceeding, Scheduling of Immediate Case Management Conference, and Issuance of Related Administrative Orders (Aug. 23, 2013) (“Nye County Motion”). Nye County filed two essentially identical motions, one before the Commission and one before the Atomic Safety and Licensing Board. References herein to the Nye County Motion refer to the one pending before the Commission.

² State of Nevada Motion for Commission Action Related to a Possible Restart of the Yucca Mountain Licensing Proceeding (Aug. 23, 2013) (“Nevada Motion”).

³ *In re Aiken County*, No. 11-271, 2013 WL 4054877 (D.C. Cir. Aug. 13, 2013) (“*Aiken*”).

mandated [Yucca Mountain] licensing process.”⁴ The Court, however, did not specify how the remaining appropriated funds should be spent, nor would a court be expected to do so.

NEI respectfully submits that the \$11.1 million in appropriated funds should be directed first toward the expeditious and efficient completion and publication of the unfinished volumes of the NRC Staff’s Safety Evaluation Report (“SER”) for the proposed high-level waste repository at Yucca Mountain, including conclusions as to whether the proposed Yucca Mountain repository satisfies the applicable Commission regulations. This is the most judicious use of the limited funds available. And, without knowing the Staff’s conclusions as to whether the proposed Yucca Mountain repository satisfies applicable regulatory requirements, it is premature to consider resumption of other Yucca Mountain licensing activities. Assuming that the Staff’s conclusions are positive, if funds remain after the SER volumes are completed and published (or if any new funding is appropriated), then it would be appropriate for the Commission to consider resumption of other Yucca Mountain licensing activities.

I. RELEVANT BACKGROUND ON YUCCA MOUNTAIN SERS

The NRC Staff published the completed Yucca Mountain SER Volume 1 concerning General Information in August 2010.⁵ SER Volume 1 “documents the NRC staff’s review and evaluation of general information” provided in the Department of Energy’s (“DOE’s”) license application for a high-level waste repository at Yucca Mountain and concludes that “DOE has provided information that satisfies the requirements” of applicable NRC regulations.⁶

⁴ *Aiken*, 2013 WL 4054877 at *1, *7.

⁵ NUREG-1949, Vol. 1, Safety Evaluation Report Related to Disposal of High-Level Radioactive Wastes in a Geologic Repository at Yucca Mountain, Nevada; Volume 1: General Information (Aug. 2010).

⁶ *Id.* at v.

SER Volume 1 was to be the first of five SER volumes.⁷ SER Volume 2 was to address Repository Safety Before Permanent Closure; Volume 3 was to address Repository Safety After Permanent Closure; Volume 4 was to address Administrative and Programmatic Requirements; and Volume 5 was to address License Specifications.⁸ But the remaining SER volumes were not completed or published because, in October 2010, the NRC Staff began discontinuing its Yucca Mountain activities.⁹ Instead of completing and publishing the remaining SER volumes, the NRC prepared a technical evaluation report (“TER”) for each of three of the remaining four SER volumes.¹⁰ Each TER was intended to be a “knowledge management document” that “captures the NRC staff’s technical assessment of information presented in [the Department of Energy’s (“DOE’s”)] Safety Analysis Report (SAR), dated June 3, 2008, as amended, and supporting information.”¹¹ The TERs do not, however, “include conclusions as to whether or not [DOE’s Yucca Mountain SAR] satisfies the Commission’s regulations.”¹²

Since publication of the TERs, the NRC has represented to Congress that “an estimated 6-8 months was needed to complete all volumes of the SER at a cost of \$6.5 million.”¹³

⁷ See NUREG-1949, Vol. 1 iii-iv.

⁸ *Id.*

⁹ See NUREG-2107, Technical Evaluation Report on the Content of the U.S. Department of Energy’s Yucca Mountain Repository License Application, Postclosure Volume: Repository Safety After Permanent Closure (Aug. 2011) at xvii.

¹⁰ See *id.* See also NUREG-2108, Technical Evaluation Report on the Content of the U.S. Department of Energy’s Yucca Mountain Repository Application, Preclosure Volume: Repository Safety Before Permanent Closure (Sept. 2011) at xv; NUREG-2109, Technical Evaluation Report on the Content of the U.S. Department of Energy’s Yucca Mountain Repository License Application, Administrative and Programmatic Volume (Sept. 2011) at ix.

¹¹ NUREG-2107 at xvii; NUREG-2108 at xv; NUREG-2109 at ix.

¹² *Id.*

¹³ Letter from Fred Upton, Chairman, United States House of Representatives Committee on Energy and Commerce, and John Shimkus, Chairman, United States House of Representatives Energy and Commerce Subcommittee on Environment and the Economy, to Allison M. Macfarlane, Chairman, U.S. Nuclear Regulatory Commission (Aug. 23, 2013) at 1.

II. THE NRC'S REMAINING APPROPRIATIONS SHOULD BE USED FIRST TO COMPLETE AND PUBLISH THE UNFINISHED SER VOLUMES

NEI respectfully submits that the Commission should begin its compliance with the D.C. Circuit's mandamus order by directing that the remaining \$11.1 million in appropriated funds (or whatever necessary portion of those funds) be used first to complete and publish the unfinished volumes of the Yucca Mountain SERs, including conclusions as to whether the proposed Yucca Mountain repository satisfies the applicable Commission regulations.

Completion of the Yucca Mountain SERs is integral to the Yucca Mountain licensing process and an essential predicate to the licensing hearing. As succinctly stated in SER Volume 1,

[a]ny NRC decision on whether to authorize construction of a geologic repository for high-level radioactive waste (HLW) disposal at Yucca Mountain, Nevada, will be made only after the NRC staff has completed all volumes of the SER.¹⁴

It thus makes eminent sense for the Commission to direct that the \$11.1 million in remaining funds appropriated for Yucca Mountain first be used to complete the Staff's safety review. Absent a conclusion that the proposed Yucca Mountain repository satisfies the applicable regulations, construction cannot be authorized. All other potential uses for the limited remaining funds are therefore premature and secondary to completing the Staff's safety review. Prioritizing the Staff's safety review would be the most judicious use of the limited funds available.

Because it is unknown how much of the \$11.1 million will remain available after completion of the SER volumes, it is premature for the Commission to direct the expenditure of funds on any other licensing or hearing activity. Although the NRC has represented to Congress

¹⁴ NUREG-1949 at xi.

that \$6.5 million would be required to complete the remaining SER volumes, that amount is only an estimate. Until such time as the Commission knows with certainty how much, if any, of the \$11.1 million will remain after completion of the SERs, it should not direct the resumption of any other Yucca Mountain-related activity.¹⁵ Simultaneously pursuing multiple licensing or pre-hearing activities, given the limited funds available, could result in completing none of those activities. After the safety review is completed, the Commission can prioritize the use of any remaining funds, soliciting input from the parties to the proceeding as appropriate. In this respect, NEI believes that the Commission should identify its budget and prepare a prioritized plan for use of appropriated funds, including funds available after completion of the SERs, and make this information available to the parties and the public.

To the extent that Nye County requests that the Commission direct that the \$11.1 million in appropriations be spent on completing and publishing the unfinished SERs, including the conclusions as to whether the proposed Yucca Mountain repository meets applicable regulatory requirements (*see* Nye County Motion at 4, 16-17), NEI supports the request. At this time, NEI opposes the remainder of Nye County's requests. Nye County requests that the Atomic Safety and Licensing Board (the "Board") review its Motion, and any other motion filed on these matters, in the first instance. Nye County Motion at 4 n.4. It also requests that the Yucca Mountain adjudicatory proceedings be restarted, including reconvening the Board and scheduling a case management conference to reinstitute discovery. *Id.* at 4, 10, 14-15. Nye County also suggests that a reconvened Board should "take further measures it sees fit to

¹⁵ To assure that funds remain available to pursue additional licensing activities after completion and publication of the unfinished SER volumes, the Commission must ensure that the safety review is performed as efficiently and expeditiously as possible, including any reorganization and reassignment of NRC Staff members. NEI is confident that this can be accomplished, as evidenced by the Commission's successful efforts in managing the Waste Confidence proceedings

preserve NRC funds for the licensing process itself” and to “order” the NRC Staff to take certain actions, including resuming its “mandatory duties under the NWPA.” *Id.* at 4, 10. *See also id.* at 16-17. These requests are inappropriate for multiple reasons.

First, this proceeding is currently suspended.¹⁶ Accordingly, the Nye County Motion is properly before the Commission. Indeed, whether and how to “preserve” or expend NRC funds appropriated by Congress is squarely within the Commission’s purview, not that of the Commission’s licensing boards. The Commission has long held that “[l]icensing boards simply have no jurisdiction over nonadjudicatory activities of the Staff,” whose “reviews, which frequently proceed in parallel to adjudicatory proceedings, fall under the direction of Staff management and the Commission itself, not licensing boards.”¹⁷ In short, the Board does not possess the authority Nye County wishes it to exercise. Second, reconstituting the Board to address this and related motions, or to resume adjudicatory proceedings, is premature and would imprudently expend limited resources on secondary activities. Completion and publication of the unfinished SER volumes should be prioritized over all other potential uses for the remaining funds. Once the remaining SER volumes are finished, it may be appropriate to restart the adjudicatory proceedings, to the extent that funds remain available.

NEI similarly opposes the Nevada Motion because Nevada’s requests would result in the expenditure of the limited, appropriated funds on fruitless tasks and are otherwise premature. Nevada’s request that the Licensing Support Network (“LSN”) be reconstituted (Nevada Motion at 3-8) is nothing more than a transparent attempt to have the Commission waste “part of [its]

¹⁶ *See U.S. Department of Energy* (High Level Waste Repository), CLI-11-15, 74 N.R.C. 815, 815 & n.2 (2011) (citing *U.S. Department of Energy* (High Level Waste Repository), LBP-11-24, 74 N.R.C. 368 (2011)).

¹⁷ *Duke Energy Corp.* (Catawba Nuclear Station, Units 1 and 2), CLI-04-6, 59 N.R.C. 62, 74 (2004).

funds on unpacking its boxes, and the remainder packing them up again” “in order to preserve” the LSN documentary material for future use.¹⁸ The \$11.1 million in remaining appropriated funds should be judiciously expended on activities that would yield the most useful results, in this case the completion and publication of the unfinished Yucca Mountain SER volumes.¹⁹

Nevada’s request that any in-person adjudicatory proceedings be conducted in Las Vegas (Nevada Motion at 3, 8-10) is likewise a waste of limited funds at this time. Until the unfinished Yucca Mountain SER volumes are completed and published, it is pointless to consider the restart of adjudicatory proceedings or any other licensing activity. If sufficient funding remains available after publication of the unfinished SER volumes, then it might be appropriate to consider restart of other licensing activities.

III. CONCLUSION

For the reasons set forth above, NEI respectfully requests that the \$11.1 million in Yucca Mountain appropriated funds be used first towards completing and publishing the

¹⁸ *Aiken*, 2013 WL 4054877 at *9, *10 (Garland, C.J., dissenting).

¹⁹ If Nevada truly believes that reconstituting the LSN is “critical to the proper conduct of any restarted Yucca Mountain licensing proceeding” (Nevada Motion at 6), then Nevada should support, and request that its Congressional delegation support, sufficient funding for that purpose.

unfinished SER volumes. If funds remain available (or if new funds are appropriated) after that task is complete, it may then be appropriate to consider resumption of other licensing activities.

Respectfully submitted,

/electronically signed by Timothy J. V. Walsh/

Ellen C. Ginsberg
Anne W. Cottingham
Jerry Bonanno
Nuclear Energy Institute, Inc.
1201 F Street, NW, Suite 1100
Washington, DC 20004
Tel: 202-739-8000
Fax: 202-785-4019

Jay E. Silberg
Timothy J. V. Walsh
Pillsbury Winthrop Shaw Pittman, LLP
2300 N St., NW
Washington, DC 20037-1122
Tel: 202-663-8455
Fax: 202-663-8007
E-mail: timothy.walsh@pillsburylaw.com

David A. Repka
Winston & Strawn, LLP
1700 K Street, NW
Washington, DC 20006-3817
Tel: 202-282-5000
Fax: 202-282-5100

Dated: August 30, 2013

Counsel for NEI

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE COMMISSION

In the Matter of)	
)	Docket No. 63-001-HLW
U.S. DEPARTMENT OF ENERGY)	
(High-Level Waste Repository))	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing “Nuclear Energy Institute’s Answer to Motions Concerning Resumption of Yucca Mountain Licensing Activities” has been served upon the following persons on this 30th day of August, 2013 by Electronic Information Exchange.

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

Construction Authorization Board (CAB) 04

Thomas S. Moore, Chair
Administrative Judge
tsm2@nrc.gov
G. Paul Bollwerk, III
Administrative Judge
paul.bollwerk@nrc.gov
Paul S. Ryerson
Administrative Judge
paul.ryerson@nrc.gov
Richard E. Wardwell
Administrative Judge
richard.wardwell@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. Nuclear Regulatory Commission
Office of the General Counsel
Mail Stop O-15D21
Washington, DC 20555-0001
Jessica Bielecki, Esq.

jab2@nrc.gov
Elva Bowden Berry, Esq.
Elva.bowdenberry@nrc.gov
Rebecca Giiter
rebecca.giiter@nrc.gov
Daniel W. Lenehan, Esq.
daniel.lenehan@nrc.gov
Mitzi A. Young, Esq.
mitzi.young@nrc.gov
Megan Wright
Megan.wright@nrc.gov
Nicole Picard
nicole.picard@nrc.gov OGC Mail Center
OGCMailCenter@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

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
James Bennett McRae
ben.mcrae@hq.doe.gov
Cyrus Nezhad
cyrus.nezhad@hq.doe.gov

Counsel for U.S. Department of Energy
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004

Raphael P. Kuyler, Esq.
rkuyler@morganlewis.com
Charles B. Moldenhauer, Esq.
cmoldenhauer@morganlewis.com
Thomas D. Poindexter, Esq.
tpoindexter@morganlewis.com
Alex S. Polonsky, Esq.
apolonsky@morganlewis.com
Donald J. Silverman, Esq.
dsilverman@morganlewis.com
Shannon Staton
sstaton@morganlewis.com

Egan, Fitzpatrick, Malsch & Lawrence, PLLC
1777 N.E. Loop 410, Suite 600
San Antonio, TX 78217
Charles J. Fitzpatrick, Esq.
cfitzpatrick@nuclearlawyer.com
Laurie Borski, Paralegal
lborski@nuclearlawyer.com

Counsel for U.S. Department of Energy
Hunton & Williams LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219
Donald P. Irwin, Esq.
dirwin@hunton.com
Michael R. Shebelskie, Esq.
mshebelskie@hunton.com
Stephanie Meharg
smeharg@hunton.com

Counsel for State of Nevada
Egan, Fitzpatrick & Malsch, PLLC
1750 K Street, NW, Suite 350
Washington, DC 20006
Susan Montesi
smontesi@nuclearlawyer.com

Lincoln County District Attorney
P. O. Box 60
Pioche, NV 89403
Annie Bailey
baileys@lcturbonet.com

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

For Lincoln County, Nevada
Intertech Services Corporation
PO Box 2008
Carson City, NV 89702
Mike Baughman, Consultant
mikebaughman@charter.net

Counsel for Nye County, Nevada
Clark Hill
601 Pennsylvania Avenue, NW, #1000
Washington, DC 20004
Robert Andersen, Esq.
randersen@clarkhill.com
Clare Christopher, Esq.
cclare@clarkhill.com

Nuclear Waste Repository Project Office
1210 E. Basin Road, Room 6
Pahrump, NV 89060
Celeste Sandoval
csandoval@co.nye.nv.us

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

Counsel for Clark County, Nevada
Jennings, Strouss & Salmon
1350 I Street, N.W., Suite 810
Washington, DC 20005-3305
Elizabeth A. Vibert
Elizabeth.Vibert@ccdandv.com
Silma Alleyne
salleyne@jsslaw.com

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

Counsel for Clark County, Nevada
Jennings, Strouss & Salmon
8330 W. Sahara Avenue, #290
Las Vegas, NV 89117
Phil Klevatorick
klevatorick@clarkcountynv.gov

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

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

For White Pine County, Nevada
Office of the District Attorney
801 Clark Street, Suite 3
Ely, NV 89301
Kelly Brown, District Attorney
kbrown@mwpower.net
Mike Simon
wpnucwst1@mwpower.net

Counsel for Inyo County, California
Gregory L. James, Attorney at Law
712 Owens Gorge Road
HC 79, Box
Mammoth Lakes, CA 93546
gljames@earthlink.net

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

Counsel for Inyo County
Law Office of Michael Berger
233 East Carrillo Street, Suite B
Santa Barbara, CA 93101
Michael Berger, Esq.
michael@lawofficeofmichaelberger.com
Robert Hanna, Esq.
robert@lawofficeofmichaelberger.com

Cathreen Richards
crichards@inyocounty.us

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

Nuclear Energy Institute
1201 F Street, NW, Suite 1100
Washington, DC 20004-1218
Jerry Bonanno, Esq.
jxb@nei.org
Anne W. Cottingham, Esq.
awc@nei.org
Ellen C. Ginsberg, Esq.
ecg@nei.org

California Department of Justice
Office of the Attorney General
1300 I Street, P.O. Box 944255
Sacramento, CA 94244-2550
Michele Mercado
Michele.mercado@doj.ca.gov

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

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

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

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

Counsel for Joint Timbisha Shoshone Tribal Group
Fredericks, Peebles, & Morgan LLP
2020 L Street, Suite 250
Sacramento, CA 95814
Darcie L. Houck, Esq.
dhouck@ndnlaw.com
Felicia M. Brooks
fbrooks@ndnlaw.com
Ross Colburn Esq.
rcolburn@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
Steven A. Heinzen, Esq.
sheinzen@gklaw.com
Julie Dobie
jdobie@gklaw.com
Jacqueline Schwartz
jschwartz@gklaw.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
rwilson@winston.com
David A. Repka, Esq.
drepka@winston.com
Carlos L. Sisco, Senior Paralegal
csisco@winston.com

Counsel for State of South Carolina
Davidson & Lindemann, P.A.
1611 Devonshire Drive
P.O. Box 8568
Columbia, SC 29201
Kenneth P. Woodington, Esq.
kwoodington@dmi-law.com

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

Counsel for State of Washington
Office of the Attorney General
P.O. Box 40117
Olympia, WA 98504-0117
Todd R. Bowers, Esq.
toddb@atg.wa.gov
Andrew A. Fitz, Esq.
andyf@atg.wa.gov

Counsel for Prairie Island Indian Community
Public Law Resource Center PLLC
505 N. Capitol Avenue
Lansing, MI 48933
Don L. Keskey, Esq.
donkeskey@publiclawresourcecenter.com

Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, FL 32303
Cynthia Miller, Esq.
cmiller@psc.state.fl.us

Prairie Island Indian Community Legal
Department
5636 Sturgeon Lake Road
Welch, MN 55089
Philip R. Mahowald, Esq.
pmahowald@piic.org

Nevada Attorney General's Office
100 North Carson Street
Carson City, NV 89701
Marta Adams, Chief Deputy
madams@ag.nv.gov

Joe Kennedy
joekennedy08@live.com

Susan Lynch
Slynch1761@gmail.com

Loreen Pitchford
nwop@comcast.net

Counsel for National Association of Regulatory
Utility Commissioners (NARUC)
1101 Vermont Avenue, Suite 200
Washington, DC 20005
James Ramsay, Esq.
jramsay@naruc.org
Jody Farnsworth
jfarnsworth@naruc.org

Steve Frishman
steve.fr@hotmail.com

Patricia Larimore
plarimore@talisman-intl.com

Daniel Maerten
dmaerten@caci.com

Jason Pitts
jayson@idtservices.com

/s/ Timothy J. V. Walsh
Timothy J. V. Walsh