

WRITER'S DIRECT DIAL NO.
(212) 849-7170

WRITER'S EMAIL ADDRESS
sandyweisburst@quinnemanuel.com

March 15, 2017

Ms. Judith C. Whitney
Clerk of the Board
Vermont Public Service Board
Peoples United Bank Building
112 State Street
Montpelier, VT 05620-2701

Re: Docket 8880: 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 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

Dear Ms. Whitney:

On behalf of Joint Petitioners Entergy and NorthStar, we are filing today Joint Petitioners' Response To Motion For Leave To Intervene Of The Elnu Abenaki Tribe.

We certify that we have made this filing through ePSB, which we understand will serve, by email to parties opting to use ePSB in this proceeding, notice that this filing has been made and may be accessed through ePSB.

Thank you for your attention to this matter.

Respectfully submitted,



Sanford I. Weisburst

STATE OF VERMONT
PUBLIC SERVICE BOARD

Joint Petition of NorthStar Decommissioning)	
Holdings, LLC, NorthStar Nuclear)	
Decommissioning Company, LLC, NorthStar)	
Group Services, Inc., LVI Parent Corp., NorthStar)	Docket No. 8880
Group Holdings, LLC, Entergy Nuclear Vermont)	
Investment Company, LLC, and Entergy Nuclear)	
Operations, Inc., and 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’ RESPONSE TO MOTION FOR LEAVE TO INTERVENE
OF THE ELNU ABENAKI TRIBE

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 response to the motion to intervene filed by the Elnu Abenaki Tribe on March 7, 2017.¹

Joint Petitioners do not object to the Elnu Motion. Joint Petitioners note, however, that the motion was filed after the March 1, 2017, due date set by the Board for motions to intervene; Joint Petitioners reserve their right to object to any untimely filings of other documents in the future on untimeliness grounds. Joint Petitioners further note that the motion is unclear on how the interest being asserted—“The Vernon Great Bend site on the CT River is highly sensitive for burials, settlement, and activity sites, and remains a culturally significant ceremonial site.” (Elnu

¹ The Missisquoi Abenaki Tribe filed a separate motion to intervene earlier today, March 15, 2017. Joint Petitioners will respond to that motion by the deadline to be set by the Board.

Motion 4)—relates to the issues before this Board in this Docket.² Joint Petitioners reserve their right to object to any attempts to introduce issues into this proceeding that are not germane to the legal criteria that the petition must satisfy or that are otherwise outside the Board’s jurisdiction.

DATED at New York, New York, this 15th day of March, 2017.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Attorneys for Entergy Nuclear Vermont Investment
Company, LLC, Entergy Nuclear Operations, Inc.,
and Entergy Nuclear Vermont Yankee, LLC

By: 

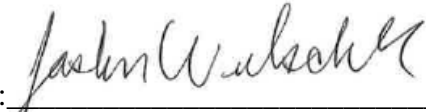
Sanford I. Weisburst*
Ellyde R. Thompson*
Hunter B. Thomson*
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7170
sandyweisburst@quinnemanuel.com

*admitted *pro hac vice*

John Marshall
Downs Rachlin Martin PLLC
90 Prospect Street
St. Johnsbury, VT 05819-2241
(802) 748-8324
jmarshall@drm.com

² Potentially, this interest could be impacted by the site restoration standards that the Board is requested to adopt in this proceeding. But the interest does not appear to be impacted by other issues in the proceeding, including without limitation the timing of decommissioning, the method of decommissioning, or the economic impacts of timing and method.

PRIMMER PIPER EGGLESTON & CRAMER PC
Attorneys for NorthStar Decommissioning
Holdings, LLC, NorthStar Nuclear
Decommissioning Company, LLC, NorthStar
Group Services, Inc., LVI Parent Corp., and
NorthStar Group Holdings, LLC

By: 

Joslyn L. Wilschek
100 East State Street, P.O. Box 1309
Montpelier, VT 05601-1309
(802) 223-2102
jwilschek@primmer.com