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March 6, 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 Motions For Leave To Intervene By the Conservation Law Foundation, International Brotherhood of Electrical Workers, Local Union No. 300, Vermont Agency of Natural Resources, Vermont Attorney General's Office, Associated Industries of Vermont, and Vernon Planning and Economic Development Commission.

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' CONSOLIDATED RESPONSE
TO MOTIONS FOR LEAVE TO INTERVENE

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 consolidated response to the motion to intervene of the Conservation Law Foundation (“CLF”), filed on February 14, 2017; the motion to intervene of International Brotherhood of Electrical Workers, Local Union No. 300, filed on February 20, 2017; and the motions to intervene of the Vermont Agency of Natural Resources, Vermont Attorney General’s Office, Associated Industries of Vermont, and Vernon Planning and Economic Development Commission, each of which was filed on March 1, 2017.

Joint Petitioners do not oppose intervention by these parties. Joint Petitioners note, with regard to the allusion in CLF’s motion (at 2) to the 30 V.S.A. § 248 factors (albeit without citing that section), that the instant petition is not a Section 248 petition. Instead, the petition was filed under 30 V.S.A. §§ 107, 231, and 232. Although some Section 248 factors may be relevant by

analogy in determining the general good of the state, the petition need not meet the Section 248 criteria.

More broadly, Joint Petitioners, while not opposing the motions to intervene, reserve their right to object to parties' attempts (if any) 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 6th 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: 

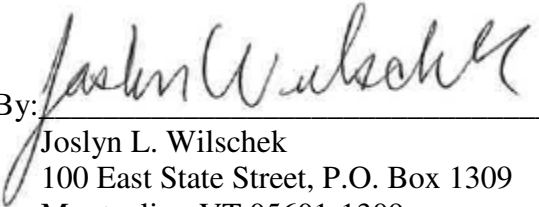
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