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MAR 22 2004  
CONNECTICUT  
SITING COUNCIL

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

PROPOSAL OF DOMINION NUCLEAR : DOCKET NO. 265  
CONNECTICUT, INC. TO MODIFY THE :  
EXISTING MILLSTONE POWER STATION :  
TO ESTABLISH AN INDEPENDENT SPENT :  
FUEL STORAGE INSTALLATION (DRY :  
STORAGE SYSTEM) ON PROPERTY :  
LOCATED OFF ROPE FERRY ROAD IN THE :  
TOWN OF WATERFORD, CONNECTICUT : MARCH 22, 2004

TOWN OF WATERFORD'S  
POST-HEARING BRIEF

I. INTRODUCTION

Dominion Nuclear Connecticut, Inc. ("Dominion") has applied to the Connecticut Siting Council ("Council") for a Certificate of Environmental Compatibility and Public Need for an Independent Spent Fuel Storage Installation ("ISFSI") at the Millstone Power Station ("Millstone") in Waterford, Connecticut. If the Council were to approve Dominion's request in full, Dominion would have the unfettered authority to add forty years worth of spent nuclear fuel to its inventory and to indefinitely store it in the Town of Waterford (the "Town"). As the host community, the Town has serious concerns about the potential to turn an electric generating facility, with ancillary spent fuel storage capacity, into an abandoned industrial site with a long-term spent nuclear fuel storage facility. If the Council grants Dominion approval for 135 dry cask storage units now, neither the Council, nor the Town

will have any other regulatory opportunity to assure that the number of dry casks and the duration of their stay are minimized. The request as submitted far exceeds any demonstrated public benefit or need.

## II. THE TOWN'S POSITION

The Town recognizes and agrees with Dominion that there is a short-term need for interim storage capacity in order to allow Unit 2 to continue operating for the duration of its current license period, which ends in 2015. Dominion and the Town agree that eighteen dry cask units are sufficient for this purpose. However, Dominion has not demonstrated to the Town or the Council that there is any current need for more than 18 units before 2015.

Dominion's justification for a facility large enough to accommodate 135 dry cask storage units is predicated on a number of assumptions and uncertainties: First, Dominion assumes that the Nuclear Regulatory Commission will renew the licenses for Millstone Units 2 and 3 for twenty years, increasing the life of the units to 2035 and 2045, respectively. The license renewal process at the Nuclear Regulatory Commission commenced only recently and, according to Dominion, will not be completed for another two and one half to three years. Dominion assumes that Yucca Mountain will not be available to receive spent fuel as scheduled in 2010. Third, the request for 135 units is based on an allocation of 50 units for Millstone Unit 1, yet Dominion has neither offered to

move Unit 1's spent fuel to the ISFSI, nor has it provided a single credible scenario that would require the transfer of all of the spent fuel from the Unit 1 spent fuel pool into dry cask storage.

Aside from the uncertainties inherent in Dominion's assumptions regarding the number of dry casks that are needed, the Town is concerned that an approval for 135 dry cask units now could obviate the use of emerging spent fuel storage technology. Finally, the Town believes that approval of more than 18 dry cask units will act as a disincentive to Dominion to remove the spent fuel from the Millstone facility as soon as it is legal to do so. Therefore, due to the uncertain and the long-term nature of this proposal, the Town urges the Council to approve only the 18 units that are needed to allow Unit 2 to operate for the remainder of its current license, and to retain its authority to approve additional units by declaratory ruling, provided that Dominion demonstrates a need for such additional units within a reasonable timeframe.

The Town understands that this is a one-of-a-kind application for the Siting Council. Accordingly, the Council does not have the benefit of precedence to guide its decision in this matter. The Town suggests, however, that the Council's rulings on telecommunications towers, with which the Council has vast experience, does provide a reasonable guide for analysis. By way of analogy, the Council has been faced with requests by cell tower developers for a tower of a certain height to accommodate a number of communication

providers. On occasion, the Council has determined that the applicant has not demonstrated a need for the requested height, and has approved a shorter tower. In such circumstances, the Council has allowed the applicant to return to request permission to extend the height of the tower as the need arises. See, for example, the Council's Decision and Order in Docket No. 203. This is exactly the approach the Town is asking the Council to take. However, in the Town's eyes, the storage of nuclear fuel warrants more scrutiny than a twenty foot section of monopole. The Council should be far more concerned about siting a facility where spent nuclear fuel will be stored indefinitely.

III. THE TOWN'S ORDERS TO REGULATE AND RESTRICT THE ISFSI ARE REASONABLE AND SHOULD BE AFFIRMED.

The Town takes its role as the host community for Millstone facility very seriously. The First Selectman, Mr. Eccard testified, for example, that he has "spent considerable time and effort on behalf of all the citizens of southeastern Connecticut on the issue of spent nuclear fuel management, from generation to cool-down, to interim storage and packaging, to shipment to the federal deep geologic spent nuclear fuel repository planned for the Yucca Mountain site in Nevada." Pre-filed testimony of Paul B. Eccard, p. 2. In this proceeding, Town representatives made extraordinary efforts to understand all of the issues concerning the establishment of an ISFSI at Millstone. Town representatives accompanied Dominion on a tour of the Bayshore Concrete Products Corporation facility in Cape Charles, Virginia, where

Transnuclear's NUHOMS concrete storage modules are fabricated. Applicant's Exhibit 3, p. 2. Town representatives also toured the Susquehanna Steam Electric Station, a nuclear power plant in Berwick, Pennsylvania, to view its spent nuclear fuel dry storage facility. Id. at 2. The Town met with Dominion representatives on numerous occasions prior to and during the municipal review process required by Section 16-50l(e) of the Connecticut General Statutes ("Conn. Gen. Stat.") to discuss the location and size of the ISFSI. By Dominion's own admission, the Town of Waterford was a "willing, interested and educated party" in this proceeding and the Town "spends a great deal of time being familiar with all of the issues going on in the nuclear industry." Transcript 2 (Tr. 2), p. 190. Testimony of D. Weekley.

As part of the statutory municipal review process, the Planning and Zoning Commission and Conservation Commission held a joint hearing to discuss Dominion's application and to receive public comment on the issue of the ISFSI. Applicants Exhibit 3, Tab 3. Based on the information received at the hearing and a review of the materials that Dominion provided to the Town, the Commissions met again independently to consider the application. That process yielded two sets of orders regulating and restricting the location and size of the ISFSI (the "Town Orders"), which are included in their entirety in Applicant's Exhibit 3, Tab 3. Of paramount importance to the Town and the Commissions was (i) to limit the capacity of the ISFSI to that required to accommodate a sufficient number of dry cask storage units to allow Unit 2 to continue to operate until the end of its current license in 2015, while maintaining full core reserve in the Unit 2 spent fuel pool, (ii) to guarantee that the

ISFSI be removed as soon as possible and prior to, or as part of, facility decommissioning, and (iii) assure that only spent nuclear fuel from Millstone would be stored in the ISFSI.

A. The Approval of 18 Units is Justified

Based on its review of the documents that Dominion provided to the Town as part of the municipal review process, conversations with Dominion representatives and citizen input, the Town Orders restrict the size of the ISFSI, including appurtenant features such as fencing and drainage, to allow space for 18 dry cask storage units and one spare unit for shielding purposes. The Town and Dominion agree that 18 dry cask units are sufficient to accommodate the spent nuclear fuel from Unit 2, for a period of eleven years, until 2015, and to maintain full core reserve in the Unit 2 spent fuel pool.<sup>1</sup> The Town and Dominion also agree on the issue of receiving spent fuel from other sources other than Millstone. Dominion has stated without qualification that it is not asking for permission to store waste from other facilities, that it will not do so and it will accept such a restriction as a condition of any Siting Council approval.

B. Dominion's Request for 135 Units is Excessive

Dominion and the Town part ways with regard to the number of dry cask storage units that are currently needed to meet Dominion's demonstrated and legally vested needs.

Dominion has not demonstrated that there is a current need for, or a public benefit from, any

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<sup>1</sup> While the Town and Dominion agree that eighteen dry cask storage units are needed to accommodate the spent nuclear fuel from Unit 2 until 2015, Dominion's testimony indicates that eighteen units, depending on how the casks are actually loaded, could provide storage capacity beyond 2015. Tr. 2, p. 215; Testimony of S. Scace.

additional capacity beyond the 18 units to which the Town agrees. Dominion's assertions to the contrary are based largely on speculation and conjecture.

**1. License Renewals**

Dominion's request for a storage capacity for 135 dry cask units is based in part on the expectation that the NRC will renew the current licenses for both Unit 2 and Unit 3 for 20 years. Transcript of February 19, 2004 Hearing ("Tr. 4"), p. 189-193. Such extensions would allow Unit 2 to operate until 2035 and Unit 3 to operate until 2045. Assuming that Dominion does receive the extension for Unit 2, it would need a total of 45 dry cask units to accommodate spent nuclear fuel generated through the extended license period (18 under the existing license and 27 units for the renewal period). *Id.* at 193. For Unit 3, Dominion would need 40 units for the current and renewal periods (13 under the current license and 27 under the renewal period.) *Id.* at p. 193 and Applicant's Exhibit 3, Tab 1, "MPS Spent Fuel Projected Removal Schedule." Although Dominion expects that it will receive the license renewals, there is a possibility that it will not. Under the current license, Dominion will not need more than 18 dry cask units until 2018. Tr. 4, p. 170, Testimony of S. Scace. Accordingly, until such time as the license renewals are granted, it would be premature to authorize more than eighteen units at this time. In the event that Dominion did obtain license renewals, it would have ample opportunity to return to the Council to seek authorization for the additional units needed to accommodate the spent fuel generated

through the end of the renewal period. Dominion has at least eleven years until it will need any of this additional capacity. The Siting Council has demonstrated on numerous occasions that it has the ability to act quickly and efficiently. Surely, Dominion will not need eleven years to apply for and receive Council approvals to add more dry cask units when they are needed.

## **2. Yucca Mountain**

The second major uncertainty influencing this application is the status of the federal nuclear waste repository at Yucca Mountain in Nevada. The record in this proceeding is replete with testimony regarding whether Yucca Mountain will open as scheduled in 2010, whether it will ever open, when it might begin accepting waste, whether the facility will have the capacity to accept all of the waste currently stored at nuclear facilities throughout the United State and how wastes will be prioritized for acceptance. Transcript of December 15, 2004 Hearing (“Tr. 1”), pp. 10-12, 83-85, 188-128, 138-143); Transcript of January 7, 2004 Hearing (“Tr. 2”), pp 60-65, 94-96, 218-222); Tr. 3, pp. 39-40, 75-88, 95-113, 217-220; Tr. 4, pp. 133-136, 173-178, 220-222. Each of these uncertainties concerns the Town. Based on the degree of speculation contained in the testimony as a whole, the only conclusion can be that all of the parties and the Council will know more about the status of Yucca Mountain in 2015 than we do now. For that reason alone, the Council should reserve its authority to



approve any more than 18 dry cask units until the future of long-term storage of nuclear waste starts to take focus.

The Town believes that issues relating to relicensing and Yucca Mountain will become clearer in time and that wiser decisions can be made in the future.

Accordingly, the Council should proceed with caution by approving only the 18 dry cask storage units (and one spare) for which a current need has been shown. For any additional units, the Council should require Dominion to return to the Council for further authorization as the need arises.

Dominion's testimony suggests that it is opposed to returning to the Council for additional authorizations on the grounds that the procedure would be too lengthy.

Dominion asserts that it could take up to six years to obtain additional approvals. Tr. 1, pp. 76-77. However, Dominion's assumption regarding the duration of such a proceeding is based on a full certificate proceeding and a subsequent period in which to resolve any administrative appeals of the Council's decision. Id. at 76-77.

Furthermore, Dominion reached this conclusion by claiming that it has spent fourteen months preparing the plans for the application, another six months for the Council proceeding and there may be appeals.

Dominion's argument that subsequent proceedings could take just as long are disingenuous. First, Dominion has already established the location and designed the ISFSI, so it will not have to completely revisit the stormwater and other issues related

to the location of the ISFSI. Second, by statute, the Council must act on any application for a certificate for an electric generating or storage facility within six months, with up to one six month extension, if the applicant so consents. Conn. Gen. Stat. § 16-50p. Thus, there is no reason to believe that a certification proceeding could not be completed within one year or less. In addition, if any appeal is taken by a project opponent, Dominion will have plenty of options to expedite the process. The courts can act quickly if the public interest so requires. In any event, Dominion testified that it could take up to eighteen months from order to delivery of a storage module. Tr. 3, p. 62; Testimony of D. Weekley. Therefore, absent a very drawn out appeal process, the Council's regulatory process for a Certificate will not interfere with Dominion's ability to obtain the additional storage units on a timely basis.

This process can be expedited even more, if the Council determines that it can grant future authorizations by declaratory ruling. The Town, as the host community, has a long history of working with Millstone owners on modifications to the facility, including a salt-shed, a training facility and a radioactive waste reduction facility. Tr. 3, p. 121, Testimony of F. Kocon. These projects have been authorized by declaratory ruling. Id. at 122. Dominion acknowledges such proceedings require less time and resources than a proceeding for a Certificate of Environmental Compatibility and Public Need. Tr. 3, pp. 62-63. A declaratory ruling proceeding would provide the Town with a meaningful opportunity to weigh in on the issues and to supply the

Council with new facts regarding the status of Yucca Mountain or advancements in technology. Further, such a proceeding would not place an undue burden on Dominion.

### **3. Unit 1 Spent Fuel Storage**

A third flaw in Dominion's claimed need for 135 units relates to Dominion's plans for Unit 1, which is no longer capable of operating. Tr. 1; Testimony of S. Scace. All of Unit 1's spent nuclear fuel is stored in its spent fuel pool. Fifty of the 135 units that Dominion is requesting are for the spent fuel in Unit 1. Tr. 1, p. 70. Testimony of D. Weekley. However, Dominion has no plans, and has not offered to remove the spent fuel from Unit 1. Dominion has simply testified that there may be some reason in the future that would dictate moving the spent fuel from the spent fuel and into dry cask storage, such as a regulatory requirement, a maintenance contingency (e.g., leaking pool liner) or a beneficial reuse of Unit 1. Applicants Exhibit 14, p. 5; Tr. 1, pp. 79, 88.

Dominion has not identified any potential uses of Unit 1 that make economic sense. Tr. 1, p. 79, Testimony of D. Weekley. Tr. 1, p. 69, Testimony of S. Scace. Dominion suggested that a possible maintenance contingency could be the detection of a leak in the liner of a spent fuel pool. Tr. 2, p. 195; Testimony of S. Scace. In the event that such a leak were detected, however, Dominion testified that it would have a "few years" to remove enough spent fuel to gain access to the leak to make the necessary repairs, and that it would take one to two years to obtain the casks needed to

store the fuel that would be removed. Tr. 2, p. 197. Testimony of S. Scace.

Depending on the location of the leak and other unspecified factors, Dominion estimates that as few as three to six dry cask units would be needed to provide enough storage capacity to address such a contingency. Id., p. 199 and Tr. 3, pp. 53-54. This is far below the fifty units requested in its application for Unit 1's spent fuel. Currently, there are no known or suspected leaks in the Unit 1 spent fuel pool, nor have there been any leaks in the past. Tr. 2, p. 196. There is only a possibility that leaks could occur in the future as the facility ages. Id. 196. Based on the foregoing, Dominion has not demonstrated a present, or even a likely future need to move any spent fuel from the Unit 1 spent fuel pool and into dry storage.

#### **4. Changing Technology**

There are also uncertainties regarding Dominion's commitment to utilize state-of-the-art technology for the dry cask storage units. For example, David Lochbaum testified that in the wake of the events of September 11, 2001, the Nuclear Regulatory Commission is studying whether currently licensed dry cask storage units are safe from acts of terror or sabotage. Tr. 3, p. 174. The NRC's study could lead to requirements to use a more robust dry cask design than is currently in use. Id. at 174. The NRC study could also lead to a requirement that existing loaded dry cask storage units must be retrofitted to meet the new standard. Id. at p. 181. It is expected that the NRC will issue a determination regarding the standard design for dry cask storage within the next

eighteen months. Id. at p. 180. Therefore, even now, the dry cask units that Dominion plans to use may be deemed obsolete in eighteen months, about the same time they are to be installed. This does not even take into account the advances in technology that could occur between now and 2015 or 2045.

Dominion does not commit to using state-of-the-art technology in the future, but only agrees to use NRC certified cask systems. Tr. 4, p. 217; Testimony of S. Scace. Based on the uncertainty regarding future NRC requirements, the best way to assure that the most advanced dry cask units are used in the future is to limit the number of casks that are approved in this proceeding. In the future, if Dominion is able to demonstrate a need for additional storage capacity, the Council would be in a position to evaluate a proposal based on the best available information at that time.

#### **5. Life Span Issues**

As previously mentioned, the Town of Waterford does not want Dominion's ISFSI to become a long-term spent nuclear fuel storage facility by default. Accordingly, the Town's orders require that Dominion remove the ISFSI prior to or at the time the Millstone units are decommissioned. Applicant's Exhibit 3. Dominion stated that it cannot commit to a timetable for removing spent nuclear fuel from Millstone because it will not be able to do so until such time that a federal repository is available to receive the spent fuel. Tr. 3, p. 80; Testimony of D. Weekley.

Further, even if such a repository were open, there is no assurance that Dominion would be required to expedite the removal of the spent fuel from ISFSI. For example, under Dominion's standard contract with the Department of Energy, Dominion could exchange its allocation priority, or its position in the queue, to another party, and could do so for operational or financial reasons.<sup>2</sup> Tr. 3, pp. 83-92; Testimony of B. Wakeman. Dominion is unwilling to limit its ability to do so. Tr. 3, p. 102; Testimony of S. Scace. In summary, Dominion refuses to commit to an obligation to remove spent nuclear fuel from the ISFSI as soon as it is legally allowed to do so. Dominion's unwillingness to agree to this condition heightens the Town's concerns that the ISFSI will remain in place indefinitely and hardens its position that the capacity of the ISFSI should be minimized now, and only expanded in the future with additional Council approval.

#### IV. REQUIREMENTS FOR ANY CONDITIONAL APPROVAL.

The Town's Orders are based on a thorough and thoughtful review and analysis of Dominion's application. The Town believes its Orders are fair to Dominion, achieve a public benefit and are necessary to protect the citizens of Waterford and the State of Connecticut. The Town stands by its Orders and asks that the Council respect and adopt them. However,

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<sup>2</sup> Dominion testified that it would not be illegal for Dominion to receive financial compensation from a third party in exchange for Dominion's position in the queue. Tr. 3, pp. 86-87; Testimony of B. Wakeman.

the Town understands that the Council may modify or revoke its Orders by a vote of six members of the Council pursuant to Conn. Gen. Stat. § 16-50x(d). In the event that the Council may do so, the Town requests that, at a minimum, the Council adopt the following conditions of any approval:

1. The Council should reduce the size of the footprint on the ISFSI by eliminating the northernmost portion of the ISFSI (the so-called “dogleg”). This portion includes approximately 35 units as shown on the Applicant’s Exhibit 15. Doing so will reduce the amount of excavation by approximately 40 percent. Tr. 3, p. 124; Testimony of F. Kocon. Therefore, it will reduce the overall physical impact of the construction significantly. Dominion has indicated that it is amenable to such a reduction in the size of the ISFSI as a condition of any approval. Tr. 3, p. 126; Testimony of D. Weekley.
2. Allow the preparation of the reduced ISFSI, including completion of drainage work, construction of the security fences, and the construction of a concrete pad that will accommodate 18 loaded dry cask storage units and one spare.
3. Limit the approval to allow the loading of 18 dry cask units with spent fuel from Unit 2 as needed to maintain full core reserve in the Unit 2 spent fuel pool for the remainder of its current license. This will allow Dominion to operate until 2015.

4. Require Dominion to seek a declaratory ruling from the Council for the approval of any additional units within the approved ISFSI area, or for any expansion of the ISFSI into the “dogleg” area.
5. Require Dominion to remove spent nuclear fuel from the ISFSI as soon as it is legally able to so.
6. Prohibit Dominion and any successors or assigns from accepting or storing spent nuclear fuel from any facility other than Millstone. Dominion has agreed to such a condition.
7. Require Dominion to provide the Town and the Council with annual updates summarizing the status of relicensing efforts, the status of Yucca Mountain or other repository facilities, changes in dry cask storage technology, regulatory changes affecting dry cask storage, plans for Unit 1 and any operational or safety issues pertinent to dry cask storage. Dominion has agreed to provide this information Tr. 3, p. 114; Testimony of D. Weekley.
8. Require Dominion to provide the Town with any submittals it makes to the Nuclear Regulatory Commission, Department of Energy or other regulatory agencies that involve generation, storage, transport or disposal of spent nuclear fuel from Millstone. Dominion has agreed to provide the submittals to the Town as a condition of any Council approval. Id. at 116.



9. Require Dominion to install groundwater wells upgradient and downgradient of the proposed ISFSI and implement a groundwater monitoring plan approved by the Council. Dominion has agreed to implement a groundwater program as a condition of any Council approval. Id. at 118.

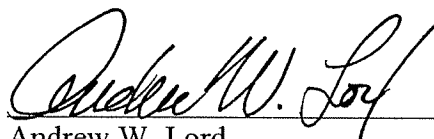
### CONCLUSION

In conclusion, based on the foregoing, the Town respectfully requests that the Council render a decision that is consistent with the Town Orders. Of paramount importance to the Town is a limit of 18 dry cask storage units at this time and a requirement for Dominion to seek Council approvals for any additional dry cask storage capacity. Therefore, if the Council were to modify the Town's Orders, the Town respectfully requests that any approval include the conditions described herein.

RESPECTFULLY SUBMITTED,

THE TOWN OF WATERFORD

By:

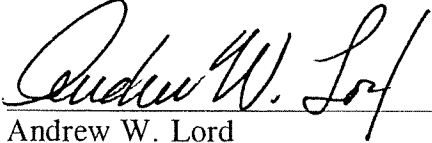


Andrew W. Lord  
Mark R. Sussman

Murtha Cullina LLP  
CityPlace I, 29<sup>th</sup> Floor  
185 Asylum Street  
Hartford, Connecticut 06103  
(860) 240-6000

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Town of Waterford's Post-Hearing Brief was either hand-delivered or sent first class mail, postage prepaid, on this 22<sup>nd</sup> day of March, 2004 to the individuals on the attached Service List.

  
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Andrew W. Lord

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

<b>Status Granted</b>	<b>Status Holder (name, address &amp; phone number)</b>	<b>Representative (name, address &amp; phone number)</b>
<b>Applicant</b>	Dominion Nuclear Connecticut, Inc.	<p>Daniel A. Weekley Director Northeast Government Affairs Dominion Resources Services, Inc. Millstone Power Station Rope Ferry Road Waterford, CT 06385</p> <p>Kenneth C. Baldwin, Esq. Robinson &amp; Cole LLP 280 Trumbull Street Hartford, CT 06103 (860) 275-8200 (860) 275-8299 fax <a href="mailto:kbaldwin@rc.com">kbaldwin@rc.com</a></p> <p>Lillian M. Cuoco, Esq. Senior Counsel Dominion Resources Services, Inc. Millstone Power Station Rope Ferry Road Waterford, CT 06385</p>
<b>Party</b>	Town of Waterford	<p>Robert A. Avena, Esq. Town Attorney Kepple, Morgan &amp; Avena P.C. Box 3A Anguilla Park 20 South Anguilla Road Pawcatuck, CT 06379 (860) 599-3739 (860) 599-3778 fax <a href="mailto:kmalawfirm@aol.com">kmalawfirm@aol.com</a></p> <p>Mark R. Sussman, Esq. Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace 1, 29<sup>th</sup> Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6000 (860) 240-6150 fax <a href="mailto:ALORD@MURTHALAW.COM">ALORD@MURTHALAW.COM</a></p>

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<b>Party</b>	Town of Waterford continued...	Honorable Paul B. Eccard, First Selectman Waterford Town Hall 15 Rope Ferry Road Waterford, CT 06385-2806
<b>Party</b>	Connecticut Coalition Against Millstone ("CCAM")	Nancy Burton 147 Cross Highway Redding Ridge CT 06876 (203) 938-3952 (203) 938-3168 - fax nancyburtonsq@aol.com
<b>Party</b>	Southeastern Connecticut Council of Governments	James S. Butler, AICP Executive Director Southeastern Connecticut Council of Governments 5 Connecticut Avenue Norwich, CT 06360 (860) 889-2324 (860) 889-1222 fax seccog@snet.net
<b>Party</b>	Attorney General Richard Blumenthal	Robert D. Snook Assistant Attorney General Office of the Attorney General 55 Elm Street, P.O. Box 120 Hartford, CT 06141-0120 (860) 808-5020 (860) 808-5347 fax

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<b>Status Granted</b>	<b>Status Holder (name, address &amp; phone number)</b>	<b>Representative (name, address &amp; phone number)</b>
<b>Party</b>	Dr. Milton C. Burton 32 Seabreeze Drive Waterford, CT 06385	
<b>Party</b>	Clarence O. Reynolds 1506 Route 163 Oakdale, CT 06376	
<b>Party</b>	Geraldyn Cote Winslow 30 Mullen Hill Road Waterford, CT 06385	
<b>Party</b>	William H. Honan 147 Cross Highway Redding Ridge, CT 06876	