

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

ENTERGY NUCLEAR VERMONT )  
YANKEE, LLC and ENTERGY NUCLEAR )  
OPERATIONS, INC., )

Docket No: 1:11-CV-99

Plaintiffs, )

v. )

PETER SHUMLIN, Governor of the State of Vermont; )  
WILLIAM SORRELL, Attorney General of the State of )  
Vermont; and JAMES VOLZ, JOHN BURKE, and )  
DAVID COEN, members of the Vermont Public Service )  
Board, )

Defendants )

**DECLARATION OF JOYCE CUSIMANO**

Joyce Cusimano declares as follows pursuant to 28 U.S.C. § 1746:

1. My name is Joyce Cusimano. I am office manager for the Conservation Law Foundation's office in Montpelier, VT. My business address is 15 East State St. Suite 4, Montpelier, Vermont 05602.
2. Attached hereto as Cusimano Exhibit 14 is a true and correct copy of a letter from Vermont Assistant Attorney General, Elliot Burg, to Paul Burns, Executive Director of Vermont Public Interest Research Group regarding Entergy Advertisements, dated March 9, 2009.

3. Attached hereto as Cusimano Exhibit 15A is a true and correct copy of the direct testimony of Raymond Shadis, on behalf of New England Coalition, Inc., in PSB Docket 7440 dated February 11, 2009.

4. Attached hereto as Cusimano Exhibit 15B is a true and correct copy of the direct testimony of David Lamont, on behalf of Vermont Department of Public Service, in PSB Docket 7440 dated February 11, 2009.

5. Attached hereto as Cusimano Exhibit 15C is a true and correct copy of the direct testimony of Thomas Buchanan, on behalf of the Windham Regional Commission, in PSB Docket 7440 dated January 22, 2008.

6. Attached hereto as Cusimano Exhibit 16 is a true and correct copy of the testimony of Conservation Law Foundation's (CLF) attorney, Sandra Levine, on behalf of CLF, in the Vermont House Natural Resources & Energy Committee dated February 18, 2009.

7. Attached hereto as Cusimano Exhibit 17 is a true and correct copy of an article by Senators Jim Condos and Bill Carris published in the RUTLAND HERALD, dated April 9, 2008, entitled "Holding Yankee to its Promises."

8. Attached hereto as Cusimano Exhibit 18 is a true and correct copy of an article by Senators Jim Condos and Bill Carris published in the RUTLAND HERALD, dated May 4, 2008, entitled "Who Pays to Clean Up after Entergy?."

9. Attached hereto as Cusimano Exhibit 19 is a true and correct copy of an article by Vince Illuzzi published in the RUTLAND HERALD, dated January 28, 2010, entitled "Yes to Vermont Yankee; no to Enexus."

10. Attached hereto as Cusimano Exhibit 20 is a true and correct copy of an article by the Associated Press published in the BOSTON HERALD, dated October 1, 2007, entitled "Vt. Nuke plant says cooling tower problems should not be part of license review."

11. Attached hereto as Cusimano Exhibit 21 is a true and correct copy of a letter from Entergy Nuclear Operations to U.S. Nuclear Regulatory Commission, dated September 27, 2007 regarding the Vermont Yankee License Renewal Application, Amendment 30.

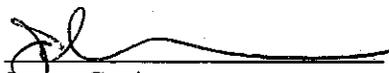
12. Attached hereto as Cusimano Exhibit 22 is a true and correct copy of an article by the Associated Press dated September 1, 2007, entitled "Two mishaps put Vermont Yankee in spotlight."

13. Attached hereto as Cusimano Exhibit 23 is a true and correct copy of an article by VPR News published on VPR.net, dated July 14, 2010, entitled "NRC Chairman Visits Brattleboro To Discuss Vermont Yankee."

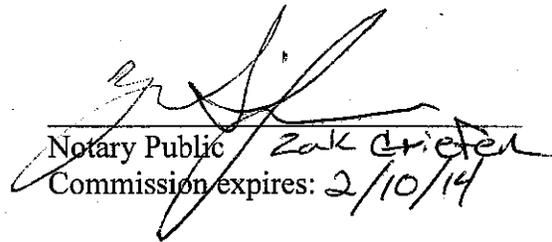
14. Attached hereto as Cusimano Exhibit 24 is a true and correct copy of an excerpt of an article by Philip Baruth published in the VERMONT DAILY BRIEFING, dated November 20, 2007, entitled "Sanders Update: Vermont Yankee's Bad Week Now in Eighteenth Straight Bad Week."

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2<sup>nd</sup> day of September 2011.

  
Joyce Cusimano  
Office Manager  
Conservation Law Foundation  
15 East State Street, Suite 4  
Montpelier, VT 05602

Subscribed and sworn before me this 2<sup>nd</sup> day of September, 2011.

  
Notary Public Zak Criveter  
Commission expires: 2/10/14