

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

In the Matter of)
)
Request for the Transfer and Amendment) Docket No. 50-482
of the Wolf Creek Generating Station)
Facility Operating License NPF-42 To)
Reflect Transfer of Ownership)

'99 APR -1 P3:57

OFFICE OF SECRETARY
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ADJUDICATION

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THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES

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March 31, 1999

99 MAR 31 P4:24

WILLIAM WOODWARD

20179

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

In the Matter of)	
)	
Request for the Transfer and Amendment)	Docket No. 50-482-LT
of the Wolf Creek Generating Station)	
Facility Operating License NPF-42 To)	
Reflect Transfer of Ownership)	

**AMICUS FILING
THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES**

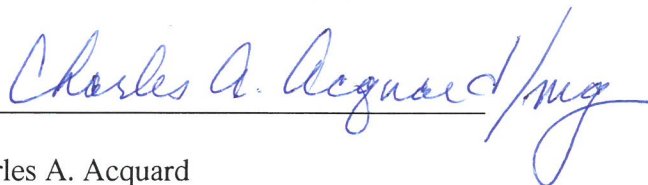
The National Association of State Utility Consumer Advocates (NASUCA) submit this amicus brief in accordance with the Memorandum and Order of March 2, 1999, issued by the Nuclear Regulatory Commission in this proceeding.

The National Association of State Utility Consumer Advocates is a non-profit association representing 42 state statutory utility consumer advocate offices in 39 states and the District of Columbia.

NASUCA submits this brief in support of Argument #1 in the initial and reply briefs of the KEPCo and NRECA, as well as the joint amicus brief of American Public Power Association and Florida Municipal Power Agency. The statutory responsibility in section 105(c) of the AEA, as well as the need for continued antitrust review of all transfers of NRC operating licenses becomes ever more important as we transition from monopoly markets toward competitive market structures. 42 USC§2135.

Respectfully submitted,

NATIONAL ASSOCIATION OF STATE
UTILITY CONSUMER ADVOCATES

By 

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March 31, 1999

CERTIFICATE OF SERVICE

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I hereby certify that I have this day served the foregoing document upon the following persons 10 C.F.R. o 2.1313:

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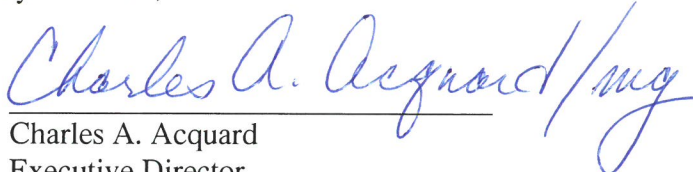
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Dated at Washington, D.C. this 31st day of March, 1999.



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