

THE STATE OF NEW HAMPSHIRE

50-443
Tony

CONSUMER ADVOCATE
MICHAEL W. HOLMES



ASSISTANT CONSUMER ADVOCATE
JOSEPH W. ROGERS

FG

OFFICE OF THE CONSUMER ADVOCATE
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(603) 271-1172

21 August 1991

Edward A. Haffer, Esq.
Sheehan Phinney
Bass & Green, PA
1000 Elm Street
P.O. Box 3701
Manchester, NH 03105-3701

RE: NDFC 91-1

Dear Mr. Haffer:

Attached you will find data requests of the Office of the Consumer Advocate in the above styled docket.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael W. Holmes".

Michael W. Holmes, Esq.

Enclosures

CC: Service List

9109090131 910821
PDR ADOCK 05000443
P PDR



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STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION
Office of the Consumer Advocate
Data Requests

For New Hampshire Yankee:

1. Has there been a "test case" of a single asset entity such as New Hampshire Yankee going bankrupt upon cessation of operations? Who would bear the burden of funding decommissioning in that instance?
2. In New Hampshire Yankee's opinion, would the corporate parent(s) of NHY hold the "deep pocket" for completion of decommissioning activities if the Decommissioning Trust Fund was not sufficient?
3. How much does NHY charge itself for low level waste storage?
4. What is New Hampshire Yankee's forecast of capital additions for each year of Seabrook's life.

For Mr. Thomas LaGuardia:

1. Has Mr. LaGuardia's contingency factor ever not been adopted by a regulatory authority in which he has testified? If so please specify the jurisdiction and provide the Order if possible.

For Attorney Dunn:

1. Please provide the I.R.S. definition of "level funding".
2. For every Joint Owner of Seabrook Station provide the last date on which the cost of Seabrook will be included in rate base for ratemaking purposes.
3. How does the fact that Decommission funds are turned over to the State Treasurer impact the tax liability? Please explain.