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- 1 legislature did. So I would need to understand that to
- 2 answer that question. I haven't seen this document
- 3 before.
- 4 Q The Vermont legislature requires that the
- 5 utility go to the Public Services Division or commission
- 6 before it files for a license renewal.
- 7 A Well, that's an important question, and so
- 8 I just can't answer that question off the top of my
- 9 head. I never considered that before.
- 10 Q Okay. You haven't considered if the state
- 11 decides to require -- to propose that PG&E go to state
- 12 agencies, ratepayer agencies, energy planning agencies,
- 13 coastal agencies before it can apply for a license
- 14 renewal? Would PG&E support that proposal?
- 15 A All I can tell you is PG&E will certainly
- 16 comply with any state laws or requirements that are put
- 17 in place. That's our duty.
- 18 Would we support such an effort? Again,
- 19 that's, I haven't considered that question before.
- 20 That's an important question. I just -- I'm not
- 21 prepared to give you an answer on that.

- 22 Q What would be PG&E's hesitation for supporting
- 23 such a proposal?
- 24 A Like I said, it's a -- that's an important
- 25 question. It's a complex question. I don't know.
- 26 I haven't done the analysis.
- 27 Q Would anybody else from PG&E be able to answer
- 28 that?

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- 1 A I doubt that anybody in PG&E could answer that
- 2 at this time.
- 3 O The full cost for the license renewal
- 4 application for the four reactors at Quad Cities and
- 5 Dresden nuclear power plants was approximately
- 6 \$14 million. There are several figures involved in
- 7 PG&E's request. There's a \$14 million figure and a
- 8 \$16 million figure and a \$19 million figure, but all of
- 9 those are more than the \$14 million figure for the full
- 10 license renewal application for four reactors.
- 11 Can you explain why your feasibility study is
- 12 costing more for -- than a full license application?
- 13 A I'm not familiar exactly with what Quad Cities
- 14 and Dresden did for their studies.
- 15 I would point out that we are in a seismic
- 16 zone, so seismic issues must be carefully addressed.

- 17 And that requires time and there's money to do that.
- 18 And California does have different regulations and laws
- 19 than the state of Illinois. And I think both the plants
- 20 you referred to are in the state of Illinois.
- 21 O That's correct.
- 22 A So there's going to be some differences there.
- 23 And I believe that would be part of the reason.
- 24 But not having looked at exactly what Quad
- 25 Cities and Dresden did, there may very well be other
- 26 issues as well. I don't know.
- 27 O Doesn't Quad Cities and Dresden have to meet
- 28 the same NRC requirements as PG&E for license renewal?
  - 1 A It would be covered under the same code of
  - 2 federal regulations. But in evaluating the system
  - 3 structures and components of the plan and deciding what
  - 4 measures needed to be -- would need to be taken to
  - 5 extend the life of the plant by 20 years, that analysis
  - 6 could be significantly different for different types of
  - 7 power plants.
  - 8 Dresden and Quad Cities, I think you said.
  - 9 Q That's correct.
  - 10 A Those are different types of reactors than
  - 11 Diablo. So those are called boiling water reactors.

- 12 And Diablo Canyon --
- 13 Q Correct.
- 14 A -- is a Westinghouse pressurized water
- 15 reactor. So that's going to drive some differences.
- 16 So, yes; I agree the regulations are the same.
- 17 But the effort, the complexity of meeting
- 18 the regulations can be different.
- 19 Q After -- if you are granted \$19 million or 14
- 20 or 16 or whatever it is in funding for a license renewal
- 21 feasibility study, does PG&E have an estimate of how
- 22 much the license renewal application will cost
- 23 the ratepayers?
- 24 A I believe we're talking -- in order to --
- 25 again, if we made the decision to proceed with license
- 26 renewal, we would need to prepare the license amendment
- 27 request on associated documents. We would need to
- 28 submit that to the NRC. There's a process for review

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- 1 and approval that are associated with that. And there
- 2 are NRC fees that need to be paid when you submit a
- 3 license amendment request. So all of those are costs
- 4 that would be incurred if we made that decision.
- 5 I believe that we're talking -- and this is a
- 6 rough estimate, but I believe we are talking \$4 to

- 7 \$6 million there.
- 8 Q So the feasibility study would be \$19 million
- 9 and the full license application which is usually about
- 10 900 pages long would be \$45 million?
- 11 A I'm saying over -- that's a rough estimate
- 12 that I'm giving for -- to carry through that license
- 13 amendment request process.
- 14 Q Does that mean that most of the work for
- 15 the license renewal application will be done within the
- 16 feasibility study?
- 17 A No, I wouldn't make that conclusion. We're
- 18 talking two different processes. We're talking about a
- 19 study that we intend to do, and we described what's
- 20 encompassed in that study. And then there's an
- 21 application process as well.
- 22 Q PG&E has done a license renewal assessment, a
- 23 license renewal study plan, and now a license renewal
- 24 feasibility study.
- 25 A We haven't performed the license renewal
- 26 feasibility.
- 27 Q I'm sorry?
- 28 A We have not performed a license renewal study.

- 1 Q Now, it's proposing to do.
- 2 A Right.
- 3 Q Who paid for the 2003 study plan or
- 4 feasibility assessment? I think it was the first one.
- 5 A PG&E paid for it. We provided the manpower to
- 6 do it, contractual costs as necessary. So that would be
- 7 something that we paid for.
- 8 Q Were those costs passed on to ratepayers?
- 9 A To the best of my knowledge, yes.
- 10 Q Were they a line item or were they general
- 11 services?
- 12 A I don't know the answer to that. The scope of
- 13 the feasibility assessment was much, much smaller than
- 14 what we would be talking about for a feasibility study.
- 15 Q And the study plan, the 2005 study plan, was
- 16 that passed on to ratepayers?
- 17 A That was part of our cost of doing business.
- 18 So as much as any cost of doing business is, the answer
- 9 would be yes.
- 20 Q It wasn't a line item; it was a general
- 21 services?
- 22 A I don't know that level of detail.

- 23 ALJ KENNEY: We're coming up to 3:30, so if you
- 24 can plan your questions accordingly.
- MS. BECKER: I have no further questions.
- 26 ALJ KENNEY: We will be in recess until 9 a.m.
- 27 tomorrow morning. Off the record.
- 8 (Whereupon, at the hour of 3:30 p.m., this matter having been continued to

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