Comments from Renee Kastanakis,

SACE Attorney for the 17th semi-annual Vogtle Construction Monitoring (VCM)

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SACE applauds both of the Commission staffs for the hard work and the difficult positions they have taken in this case. With small exceptions, SACE supports the recommendation of your Advisory Staff.

First, I would like to address this issue of non-economic benefits which are clearly important to all of you. I would like to remind you of the question that was asked of each of those witnesses in some form which was - you aren't telling this Commission they should consider your issue no matter how much it might cost to complete this project? And each of them said - no, we believe that is the issue for the commission to decide. Another way to say this - is that no matter how valuable you might see this project from a non- economic standpoint - you cannot represent the interests of the ratepayers and see these possible benefits as "priceless" - or something that must be done at any price. For example, while supporting the workers in Burke County, you cannot allow that benefit to outweigh the potential of a negative effect to the overall economic well-being of the State should we end up with higher electricity bills than are necessary. This is why there must be some balance to the risks born by the Company's shareholders and the ratepayers and why we support the limits on a go forward decision as have been recommended by both staffs.

As to the apparent interest on the part of some instead to just reduce the company's ROE, we caution that a mere cut to Return on equity does not offer protection to ratepayers. It can be an incentive to the company as it was used in the SIR stipulation, but that was used at a time when the EPC ratepayer protections were still in place. If there are no continuing protections to limit the ratepayers exposure to rising capital costs - which are likely to occur due to the FOAK risks that remain with this project, we will just find ourselves in what we consider the embarrassing situation set forth by this filing - with the Company's profit continuing to grow as capital costs increase - while the exposure of the ratepayers continues completely unfettered. This commission must instead find some way to replace the prior ratepayer protections provided by the EPC, and the limits on the go forward approvals recommended by both your staffs are an acceptable way to do that.

Last I would like to raise caution as to the advisory staff's recommendation to approve the management structure proposed by the company. I honestly don't see why such an approval is necessary, but more importantly we are concerned about the possible precedent this might set when it comes time for future commissions to review the reasonableness and prudence of the project. To the extent expenditures should result from the company's decision to put in place yet another project manager with no experience in building a nuclear plant, could this commission's decision to actually approve this structure limit later Commissions from being able to hold them responsible for the mistakes that result from that choice. If not necessary, we would recommend against that decision in this order.