

~~CONFIDENTIAL~~

~~CONFIDENTIAL~~

**THE NEVADA INITIATIVE:
THE LONG TERM PROGRAM
AN OVERVIEW**

~~CONFIDENTIAL~~

PROPOSAL BY
KENT ORAM AND ED ALLISON
TO
THE AMERICAN NUCLEAR ENERGY COUNCIL
WASHINGTON, D.C.

SEPTEMBER 1991

~~CONFIDENTIAL~~

Campaign Background

The most critical priority at hand for the nuclear energy industry is ensuring that the process of characterizing the Yucca Mountain, Nevada site continues to move forward without further slippage in the deadline for locating a national high-level waste repository. Since 1986, the industry has seen the repository target deadline slide 12 years -- to the point where the very future of a national repository is in question and the siting process established by Congress in 1982 is at risk.

However, as a result of a stepped-up industry effort during the past year, tangible progress has been made to halt this erosion and keep the program on track. A political beachhead has been established in Nevada, and the campaign to bring pressure on the state to issue permits to allow scientific study at Yucca Mountain is making substantial inroads. The industry message has been focused, influential Nevadans have been recruited to help advance the industry's objectives and a working political alliance has been established with the Department of Energy, natural allies and other key decision makers. Aggressive coalition building is under way, an in-house scientific response team has been recruited, an industry boiler room operation is functioning in Nevada and a dialogue has been developed with the media. A paid advertising campaign will begin this month.

Because of these multi-faceted Phase I efforts, the corner is being turned. The Nevada congressional delegation, lacking a cohesive strategy to respond to the stepped-up industry campaign, is under growing pressure to come to the negotiating table to discuss a package of economic benefits related to the repository. One of the two major state newspapers -- *The Las Vegas Review Journal* -- has begun to take a more objective look at the Nevada siting issue and has called for a discussion of negotiated benefits in a ground-breaking editorial. Privately, most of the business community concedes support for the site study, as do the majority of the state's labor unions.

Nevada's status as the fastest growing state leaves it facing enormous, costly infrastructure demands that are outstripping declining revenues and are leading to forecasts of up to \$360 million revenue shortfall as early as 1993. Finally, and not coincidental to these many developments, the U.S. House and Senate are actively considering legislation to remove state roadblocks to characterization.

Notwithstanding these recent successes, much remains to be done to ensure a favorable outcome. While congressional legislation may remove state roadblocks to the permitting process, repository opponents have indicated that they are considering a host of other options to hamstring site characterization. Although a political framework has been built in Nevada, the foundation is far from complete, with powerful political adversaries confronting the industry -- including two former influential governors, the present governor, the state

nuclear waste office, the state's second largest newspaper and the U.S. congressional delegation led by outspoken opponent Senator Richard Bryan. The Nevada Resort Association remains precariously uncommitted.

By a clear majority of 61 to 35 percent (with 4 percent undecided) the Nevada public at large opposes a repository. Although there has been a trend of positive movement, such gains could be seriously jeopardized given the fact that two major election cycles are scheduled for the state during 1992 and 1994, when the governorship, both two Senate seats and both congressional seats, the entire legislature and virtually every local office from sheriff to county commissioner will be contested. As a result, the debate over the repository can be expected to escalate and remain politically divisive through this pivotal election period. Accordingly, without an effective campaign to neutralize the political resistance, public opposition to the repository will be increased and reinforced.

In light of these challenges, it is critical that the industry continue to aggressively accelerate its multidisciplinary approach in Nevada, along with a multi-year commitment to complete the task by the 1994 elections. In addition to building on its political inroads, the industry must address the major obstacle to ultimate success: public attitudes, particularly as they relate to the safety. Political networking, media relations, one-on-one negotiations and stressing the benefits that the repository can bring will not assuage these fears. Major shifts in public perceptions and attitudes are achievable only through a

sustained advertising program aimed at Nevadans. Because of the public's concerns about safety, an advertising campaign addressing those concerns must be one of the focal points of the industry's final push in Nevada.

The initial phase of the industry's consolidated Nevada program has, in short, been successful. For the first time, we are making significant progress. Possible congressional action to remove state impediments to permitting will be helpful. But to build upon our gains -- and meet new and continuing challenges at hand in Nevada -- a comprehensive, stepped-up, three-year industry campaign, which blends old and new elements, must be launched.

Overall Campaign Objectives

1. In the short term, create the necessary political and public climate to allow further site characterization of Yucca Mountain to proceed.
2. Within the next three years, build the framework for political, media and public awareness that will allow successful site characterization to be completed and accepted.

3. Secure a negative agreement with the states' political and elected leaders that provides for the states' cooperation in the site characterization process in exchange for specified benefits.

Key Goals

- To manage and meet the significant political challenges posed by Nevada's forthcoming three-year state and federal election cycle (1992-94)
- To successfully take the industry's message to the public to reduce concern over the transportation and storage of nuclear waste and elevate the merits of the repository.
- To lower public and political anxieties, thereby giving Nevada political officials "air cover" to negotiate.
- To finish laying the public and political framework over the next 18 months that will allow a negotiated settlement in 1993, a non-election year during which the Nevada legislature will face a projected state deficit.

- To win acceptance by the Nevada Resort Association, the state's most important source of tax revenues.
- To convince prominent business and union leaders, who are quietly supportive, to publicly endorse the repository.
- To sustain the same multi-faceted mix of political and media components that have been responsible for the industry's successes to date.
- To send the message that the nuclear energy industry is in Nevada to stay and to create a sense of inevitability of the characterization phase of a repository in Nevada.

Key Audiences

Opinion Leaders/Shapers:

- Las Vegas Review Journal
- Reno Gazette
- Carson Appeal
- Working Press (radio, TV, print)
- Nevada Resort Association

Natural Allies:

- Business leaders
- Trade unions

Political leaders - state and national:

- Governor Bob Miller and staff
- Senator Harry Reid
- Senator Dick Bryan
- Congressman Jim Bilbray
- Congresswoman Barbara Vucanovich

Other Elected Officials:

- Local council members
- Mayors and county commissioners
- State legislators

Key Opposition:

- The Las Vegas Sun
- Nevada state officials
- Bob Loux - Governor's Nuclear Affairs' Director

Other Players:

- DOE
- Top scientists
- U.S. Senate and House
- U.S. federal courts
- The public at large

Key Campaign Elements**Political Team**

Political bridge building, negotiations and crisis control remain a linchpin of the Nevada effort and successes to date. Within the past 18 months, a seasoned team of Nevada political professionals has been recruited, led by Kent Oram, a key adviser to Governor Miller; Ed Allison, a longtime Nevada Republican political operative, and Don Williams, a state campaign strategy consultant to, among others, Senator Reid, Congressman Bilbray and numerous state legislators.

Scientific Truth Response Team

In recent months, a group of scientists has been trained by Kent Oram to function as an effective, expert in-house accuracy response team. This team serves both as a proponent of the repository and as a truth squad in responding to scientifically inaccurate, misleading or untrue allegations that are published or aired about nuclear issues or Yucca Mountain.

Media Response Team

The Media Response Team, composed of seasoned media professionals, is a new tool that will back the in-house scientific response team on more general issues and be the vehicle for generating positive free media coverage, and conversion of the press away from the its opposition to the repository.

Advertising

Paid media advertising, one of the key ingredients in the industry's campaign arsenal, is an essential component in the effort to reduce public anxiety about nuclear waste and to bring the campaign to a crossroads within the next 18 months. The media campaign will be developed and implemented by Oram, Ingram & Zurawski, the

same firm that produced commercials for Governor Bob Miller in his successful 1990 campaign.

Polling and Tracking

Regular polling and tracking of public attitudes is planned to monitor the results of both free and paid media, to measure swings in public attitudes and provide an up-to-date roadmap to navigate the communications campaign.

Free Media

Cultivating favorable free media and seizing opportunities as events unfold will be a continuing element of the campaign and a focal point of the science and attack/response teams using avenues such as editorial board visits, talk shows, etc.

Communications Strategies

One key to changing public attitudes is utilization of top scientists, who specialize in radioactive waste, nuclear engineering, seismology and volcanology, as spokespeople for the campaign. Scientists can convince the public that nuclear energy is safe. Scientists also can help educate the press, both one-on-one and through advertising.

DOE must be turned into a proactive force by training its scientists to function as an expert in-house accuracy/response team. Any time something scientifically inaccurate, misleading or untrue is published or broadcast about nuclear issues or Yucca Mountain, this team will respond publicly to correct the error.

The last three months have been spent doing this kind of training -- and the product is impressive. Over the coming year, these dedicated professionals can advance the industry's objectives more than almost any other group.

Using these scientists in an on-going program of television commercials - plus holding a series of editorial board meetings between key members of the major newspapers and TV stations and our team of scientists -- will go far to educate the press in one-on-one scenarios.

To back the in-house scientific response team, a professional media attack/response team will be deployed. Two highly respected investigative reporters and anchormen have been identified and will be able to deal with the working press as peers. The advantage of having the industry's side of stories presented by sincere, seasoned professionals is obvious. In addition to the breadth of media experience these professionals will bring to the table among their peers, they also enjoy wide recognition and high credibility with the general public.

Coupled with the team of DOE scientists, the media response team will exert a positive effect on free press coverage and attitudes. As reporters become more favorable, they will also start to look at the benefits package for Nevada. If no such package exists, they will question "why not?"

The Ad Program in Brief

The bulk of the television advertising messages will stress safety. Roughly 70 percent of the messages will be delivered by scientists. Initially, the goal will be to reduce the public's concerns over safety. Once public sentiment swings, the next phase of the campaign will focus on the merits of nuclear energy.

The primary target audience will be women, aged 25 to 49 -- the group with the highest statistical potential for favorably affecting polls if they can be informed, reassured and moved. The media campaign also will target the industry's most sympathetic base -- men aged 35 to 54 -- and focus on opinion leaders where they can be addressed, with particular emphasis on news programming and print.

To be successful, the advertising program must be sustained for a period of approximately 24 months. As the commercials unfold, the ensuing press reactions, street talk and comments from other sources will be monitored.

Current campaign plans call for the first series of television spots to air statewide beginning September 16th of this year. Radio and print are scheduled to follow about four weeks later.

The first tracking poll is scheduled for December. This poll will show how much information was absorbed, if any positive swings occurred, how our targets have moved, how much more work needs to be done and, specifically, what other messages are needed. A coordinated series of tracking polls will follow as the campaign continues.

The advertising campaign has a formidable goal. It took Nevadans a lifetime to build up fears and resentments regarding nuclear energy. Countering the amount of free press against nuclear, such as accidents as Three Mile Island and Chernobyl, hazardous leaks and various other plant

problems, along with science fiction movies, would literally cost tens of millions of dollars in terms of column inches and air time in Nevada alone. Across the country, the cost would run into the billions.

The proposed advertising placement budget is commensurate with the expenditure level for a Nevada statewide political race. While it may appear ambitious, in reality, it is very little when compared to the massive amount of anti-nuclear coverage provided by the free press over the years. If we had to run this campaign in Texas the cost would conservatively quintuple.

The ongoing advertising campaign will reduce the number of negative-leaning Nevadans and drive them into the undecided camp, where they will be more receptive to factual information. By softening public opposition, the campaign will provide "air cover" for elected officials who wish to discuss benefits. Additionally, the advertising component will act to encourage politicians to be much more cautious in their attacks.

Advertising also will reinforce the positive free press generated by the scientific and media response teams. At the same time, once the advertising begins, it is expected that the opposition will escalate its efforts.

As a result of the advertising campaign, a dialogue will be created in which we will have our messages constantly telling the pro-nuclear side of the story, while the scientists and attack/response team can counter those who counterattack with misinformation.

Budget

The budget for the program totals the following for three years:

Three Year Total	
1992	\$3,827,500
1993	3,511,000
1994	<u>1,385,000</u>
Total	\$8,723,500

A detailed budget is attached.

Summary

The Nevada campaign to date has succeeded in bringing the industry to a crossroads, where it is in position to favorably influence the outcome of efforts to allow site characterization of a high-level waste repository in Nevada.

At this juncture, it is critical that the industry put its resources behind a concerted three-year referendum-style effort that incorporates all the elements of a comprehensive modern campaign to navigate the forthcoming Nevada

election cycle, clear the final hurdles and finish the job. By deploying a combination of advertising media outreach, benefits awareness, one-on-one outreach, liaison to Nevada influentials, a scientific truth squad and an attack/response team of scientists, the pendulum can swing our way. Each element is important and together they constitute the multi-faceted political marketing plan that is needed to win.

This plan recognizes the many dynamics at play and assumes a domino theory, in which the many pieces will fall into place. With our "campaign committee" of Nevada political insiders, our strategic response teams, the advertising program and the polls that will provide us a road map along the way, we believe that as each move is made, one or more of the targeted adversaries will begin to surface, move our way, fight us and, then, eventually dialogue with the industry. It is through this strategic game of chess that the campaign will ultimately prevail and move to checkmate anti-nuclear forces in Nevada.

Conclusion: The End Product of the Campaign

Based on previous Nevada campaigns, the industry can expect several concrete gains as the result of the adoption of this comprehensive, three-year effort.

By executing the sustained, multi-faceted initiative recommended in this proposal, our projections are that within 24 months Nevadans supporting the repository will be at or near a majority (up from 35 percent today), while a solid majority, about two out of every three voters (66 percent) will be in favor of the characterization/study.

The Nevada media, in that same time span, will be transformed from simple conduits for charges and counter-charges into educators. As a result of this enhanced learning curve, the media can be expected to challenge anti-repository spokespeople when they misstate the facts.

With the positive movement in the polls and a more informed media that is less susceptible to hyperbole, the anti-repository movement will find fewer and fewer elected officials willing to even sanction their cause, much less give them credibility. Consequently, the opposition will dramatically lose numbers and effectiveness as the domino theory falls into place.

With the anti-repository volume and public antipathy turned down, more and more private sector leaders and elected officials will, conversely, escalate the call for repository benefits negotiation.

There is little question that -- with the right message, the right tactics, the right personnel, patience and commitment -- the end result will be the collapse of the anti-nuclear forces as a majority in Nevada, both in number and

in political clout. The state will cease and desist its interventionist ways to stall the characterization and the process will move forward without constant Nevada-contrived delays, i.e. checkmate for the anti-nuclear forces.

Three-Year Budget

	1992
ADMINISTRATION	
Overall Nevada Campaign Mgmt	\$ 600,000.
Political Consultants:	
Northern Nevada	120,000.
Southern Nevada	220,000.
Coordination:	
Washoe Co/Carson City Metro Coord.	60,000.
Rural Counties Coordinator	40,000.
Lobbyists:	
Washington/DOE Interface	60,000.
State Legislative Lobbyist (1993)	-0-
MEDIA RESPONSE TEAM (FREE PRESS)	160,000.
TRACKING POLLS	150,000.*
ADVERTISING	
Production:	
TV	250,000.
Radio	5,000.
Print	2,500.
Placement:	
TV	1,500,000.
Radio	300,000.
Print	300,000.
Contingency	<u>60,000.</u>
TOTAL	\$3,827,500.

*Includes \$25,000 for Tracking Poll from previously-approved budget

Three-Year Budget

1993

ADMINISTRATION

Overall Nevada Campaign Mgmt	\$ 600,000.
Political Consultants:	
Northern Nevada	120,000.
Southern Nevada	220,000.
Coordination:	
Washoe Co/Carson City Metro Coord.	60,000.
Rural Counties Coordinator	40,000.
Lobbyists:	
Washington/DOE Interface	60,000.
State Legislative Lobbyist (1993)	60,000.

MEDIA RESPONSE TEAM (FREE PRESS) 160,000.

TRACKING POLLS 125,000.

ADVERTISING

Production:	
TV	250,000.
Radio	3,500.
Print	2,500.
Placement:	
TV	1,250,000.
Radio	200,000.
Print	300,000.
Contingency	<u>60,000.</u>

TOTAL \$3,511,000.

Three-Year Budget

	1994
ADMINISTRATION	
Overall Nevada Campaign Mgmt	\$ 600,000.
Political Consultants:	
Northern Nevada	120,000.
Southern Nevada	220,000.
Coordination:	
Washoe Co/Carson City Metro Coord.	60,000.
Rural Counties Coordinator	40,000.
Lobbyists:	
Washington/DOE Interface	60,000.
State Legislative Lobbyist (1993)	-0-
MEDIA RESPONSE TEAM (FREE PRESS)	160,000.
TRACKING POLLS	125,000.
ADVERTISING	
Production:	
TV	-0-
Radio	-0-
Print	-0-
Placement:	
TV	-0-
Radio	-0-
Print	-0-
Contingency	<u>-0-</u>
TOTAL	\$1,385,000.



Allen J. Keesler, Jr.
President
Chief Executive Officer

October 25, 1991

EEI Executive Committee Members

Messrs. Jerry S. Farrington	James G. Harlow, Jr.
Edward F. Mitchell	Don D. Jordan
Edward L. Addison	William S. Lee
Richard A. Clarke	James J. O'Connor
Richard E. Disbrow	John W. Rowe
John W. Ellis	Sherwood H. Smith, Jr.

Gentlemen:

After a thorough review and discussion, The American Committee on Radwaste Disposal (ACORD) recently determined that the industry must continue its Nevada-based public information program to ensure the timely characterization of the high-level nuclear waste repository site at Yucca Mountain, Nevada. The program, called **The Nevada Initiative**, has made great progress since its inception, but the funds collected to run this program will be exhausted by year's end. Consequently, I am writing to urge your consideration of a mechanism the industry can adopt to raise the funds necessary to continue and complete this effort.

BACKGROUND

By way of background, in 1987, Congress amended the Nuclear Waste Policy Act (NWPA) and directed the Department of Energy (DOE) to study the Yucca Mountain site for a high-level nuclear waste repository. Despite DOE's best efforts to work with the State, Nevada political officials at all levels have been extremely aggressive in opposition to the project. They have effectively frustrated DOE's efforts to move forward with site characterization. Sustained progress on the Yucca Mountain program can only be achieved by developing a cooperative environment in Nevada.

To pay for DOE's site characterization work, nuclear utilities currently contribute approximately \$600 million (1 mill/kw-hr) each year to the federal Nuclear Waste Fund under contracts with DOE. However, DOE is not permitted to use these funds to attempt to change public attitudes in Nevada.

EEL Executive Committee Members
October 25, 1991
Page Two

and their attempts at public outreach have not been successful. In fact, since Congress enacted the NWSA, events clearly indicate that the DOE program only moves forward because of the active support, guidance and involvement of our industry.

THE NEVADA INITIATIVE

Beginning in January 1990, the nuclear industry, through a special funding request, began The Nevada Initiative, an effort to change public sentiment in Nevada from that of opposition to at least neutrality, positive at best. The Nevada Initiative has now developed an educational advertising and public relations infrastructure in the State to implement our strategy. An experienced and effective team of Nevada communications professionals are in place, and a \$1 million advertising campaign developed by that team is now running on TV, radio and in newspapers. The industry's strategy is to address the fears and concerns voiced in a recent poll of Nevadans directly with information and education. The initial results of this effort have been very encouraging. An important sign, as you can see from the enclosed newspaper clippings, is that the editorial policy of the Las Vegas Review-Journal, the largest newspaper in Nevada, has shifted from very negative to neutral and objective.

FUNDING THE NEVADA INITIATIVE

ACORD, the CEO Committee charged with policy guidance for this effort, has determined that a three year program, balanced between paid media, public relations and political consulting efforts, will be necessary to create and sustain an acceptable level of public support in Nevada to allow the timely characterization of the Yucca Mountain site. At this point, it appears this program will cost an average of about \$3 million per year. We need to adopt a mechanism to raise these funds that involves all nuclear utilities.

In order to streamline the fund-raising process, the Chairmen of the nuclear associations (ANEC, USCEA, and EEL) have agreed to seek approval, through proper channels, of a comprehensive funding plan based on a special assessment, calculated in a manner similar to that used for UWASTE dues and collected through a special billing included with EEL's dues. Public and cooperative utilities with nuclear programs and nuclear supply/contractor organizations will be asked to contribute as well either through separate notification or through ANEC assessments. Moreover, because the advertising portion of this program began in 1991 and will continue into 1992, a portion of the funds are needed early in the year. **If approved, it will be important to emphasize that payment of a portion or all of the assessment before the end of 1991 would be appreciated.**

I believe that this is the most productive means of meeting this commitment. Individually, each of the Chairmen of the nuclear associations agrees with me, but none have taken the question specifically to their Executive Committees or Boards of Directors. The industry has a unique window of opportunity to move public opinion in Nevada and securing the necessary financial commitments must be accomplished immediately. The success of our efforts is dependent upon the full partici-

EEI Executive Committee Members
October 25, 1991
Page Three

pation and support of all members of the nuclear industry. Until our efforts to educate and inform the citizens of Nevada are complete, the industry will continue to be hampered by the long-term risks inherent in the management of high-level waste.

I have enclosed in this package for your review a summary of the advertising plan, a videotape with several of the TV advertisements currently on the air, a package of newspaper clippings from the State of Nevada, and a list of company assessments based on the UWASTE funding formula. The cost estimates listed in the advertising plan are not final. They will be negotiated to be in conformance with the funding program. Also, please note this document is "Confidential." You can understand the sensitivity associated with it becoming public.

On behalf of ACORD, I encourage you as members of the EEI Executive Committee to approve procurement of these funds in this manner. NPOC approved this plan at its October 24 meeting. If you approve this plan, I will work with EEI to seek the support of the members of the EEI Board of Directors.

There will be a conference call of the EEI Executive Committee to discuss this plan within 2 weeks. EEI will be contacting your offices to schedule a convenient time.

If you have any questions, please don't hesitate to give me a call.

Sincerely,



Allen J. Keesler, Jr.

AJK:dsf

Enclosures

EDISON ELECTRIC INSTITUTE
NEVADA ADVERTISING INITIATIVE

ELECTRIC UTILITIES WITH NUCLEAR ENERGY UNITS	UNITS	NUCLEAR CAPACITY (MWe)	SHARE (\$)
EET MEMBERS			
American Electric Power	2	2130	\$66,673
Arizona Public Service	3	3810	83,510
Baltimore Gas & Electric	2	1690	66,673
Boston Edison	1	655	49,837
Carolina Power & Light	4	3242	100,347
Centerior	2	2111	66,673
Commonwealth Edison	12	11882	100,347
Consolidated Edison	1	873	49,837
Consumers Power	2	880	66,673
Detroit Edison	1	1093	49,837
Duke Power	7	7311	100,347
Dusquesne Light	2	1671	66,673
Entergy	4	4116	100,347
Florida Power	1	825	49,837
Florida Power & Light	4	3046	100,347
GPU Nuclear	2	1469	66,673
Gulf States Utilities	1	936	49,837
Houston Lighting & Power	2	2500	66,673
Illinois Power	1	933	49,837
Iowa Electric Light & Power	1	538	49,837
Maine Yankee	1	840	49,837
Niagara Mohawk	2	1711	66,673
Northeast Utilities	4	3266	100,347
Northern States Power	3	1605	83,510
Pacific Gas & Electric	2	2205	66,673
Pennsylvania Power & Light	2	2100	66,673
Philadelphia Electric	4	4240	100,347
Portland General Electric	1	1130	49,837
Public Service Electric & Gas	3	3340	83,510
Public Service - CO (a)	-	-	49,837
Public Service - NH	1	1250	49,837
Rochester Gas & Electric	1	470	49,837
South Carolina Electric & Gas	1	900	49,837
Southern California Edison	3	2586	83,510
Southern Company	6	5420	100,347
Texas Utilities	1	1150	49,837

EDISON ELECTRIC INSTITUTE
NEVADA ADVERTISING INITIATIVE

ELECTRIC UTILITIES WITH NUCLEAR ENERGY UNITS (Cont)	UNITS	NUCLEAR CAPACITY (MWe)	SHARE (\$)
Union Electric	1	1171	49,837
Vermont Yankee	1	514	49,837
Virginia Power	4	3390	100,347
Wisconsin Electric Power	2	994	66,673
Wisconsin Public Service	1	535	49,837
Wolf Creek Nuclear Operating	1	1170	49,837
Yankee Atomic Power	1	175	49,837
NON-EEI MEMBERS			
Dairyland Power Cooperative (a)	-	-	33,000
Nebraska Public Power District	1	778	49,837
New York Power Authority	2	1781	66,673
Omaha Public Power District	1	478	49,837
Sacramento Mun Utility District (a)	-	-	33,000
Tennessee Valley Authority	5	5491	100,347
Wash Public Power Supply System	1	1100	49,837
TOTAL	101	91873	\$3,300,000

SHARE CALCULATIONS

\$1,650,000 over 50 companies= \$33,000 per Company
 \$1,650,000 over 98 units= \$16,837 per Unit
 (For UWASTE calculation, PS-CO has 1 unit)
 (Limit of 4 units per company)

0 Units= \$33,000
 1 Unit = \$49,837
 2 Units= \$66,673
 3 Units= \$83,510
 4 Units= \$100,347

NOTES

(a) Company's only nuclear unit has been shutdown.