

March 11, 2003

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

Connecticut Coalition Against Millstone,
Petitioner,

v.

U.S. Nuclear Regulatory Commission,
Respondent,

and

Dominion Nuclear Connecticut, Inc.,
Proposed Intervenor.

No. 03-4372

MOTION OF DOMINION NUCLEAR CONNECTICUT, INC.
FOR LEAVE TO INTERVENE

Pursuant to Rule 15(d) of the Federal Rules of Appellate Procedure, Dominion Nuclear Connecticut, Inc. ("DNC") hereby moves for leave to intervene as a party respondent in the captioned proceeding. In support of its motion, DNC states:

1. Petitioner Connecticut Coalition Against Millstone ("CCAM") is seeking review of one or more decisions of the Nuclear Regulatory Commission ("NRC" or "Commission"). Specifically, CCAM cites two decisions, in two

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different NRC licensing proceedings: (a) the Commission's Memorandum and Order CLI-02-01, issued on January 30, 2002, in the Matter of Dominion Nuclear Connecticut, Inc. (Millstone Nuclear Power Station, Units 2 and 3), Docket Nos. 50-336-LA, 50-423-LA; and (b) the Commission's Memorandum and Order CLI-02-22, issued on November 21, 2002, in the Matter of Dominion Nuclear Connecticut, Inc. (Millstone Nuclear Power Station, Unit 3), Docket No. 50-423-LA-3.

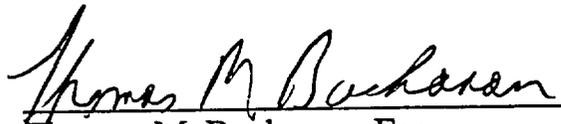
2. DNC is the majority owner and operator of the Millstone Power Station. DNC holds the NRC operating licenses for Millstone Units 2 and 3, which are the subject of the Commission decisions cited by CCAM. After acquiring Millstone Power Station on March 31, 2001, DNC became the party in interest in these NRC administrative matters and fully participated in the proceedings before the NRC.

3. The Commission's decisions relate to operating license amendments for two Millstone units. These license amendments have been issued by the NRC and support safe and efficient operations and storage of spent nuclear fuel at the Millstone plant. DNC's operations would be directly implicated by any adverse action of this Court with respect to the license amendments at issue. Although the NRC is a Respondent with respect to the CCAM petition for review, DNC has a separate interest apart from the regulatory interests of the NRC.

4. Counsel for both the Petitioner CCAM and the Respondent NRC have authorized DNC to state that their clients do not oppose DNC's intervention in this matter.

Wherefore, DNC requests that it be granted leave to intervene as a party respondent in the captioned proceeding.

Respectfully submitted,



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ATTORNEYS FOR PROPOSED
INTERVENOR
DOMINION NUCLEAR CONNECTICUT,
INC.

Dated in Washington, District of Columbia
this 11th day of March 2003

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

Connecticut Coalition Against Millstone, Petitioner,)	
)	
v.)	
)	
U.S. Nuclear Regulatory Commission, Respondent,)	No. 03-4372
)	
and)	
)	
Dominion Nuclear Connecticut, Inc., Proposed Intervenor.)	

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, Dominion Nuclear Connecticut, Inc. (“DNC”) hereby files this Disclosure Statement.

DNC is a corporation organized under the laws of the State of Delaware, with its principal place of business in Connecticut. DNC is the licensed owner and operator of Millstone Power Station, Units 1, 2 and 3, and is principally engaged in the business of generating electricity.

DNC is an indirect wholly-owned subsidiary of Dominion Resources, Inc. (“DRI”). DNC is owned directly by Dominion Nuclear Marketing I, Inc.,

Dominion Nuclear Marketing II, Inc., and Dominion Nuclear Marketing III, L.L.C., which collectively own 100 percent of DNC's stock. Other intermediate subsidiaries in the organization between DRI and one or more of the three direct owners of DNC are: Dominion Energy, Inc.; Dominion Nuclear, Inc.; Dominion Nuclear Holdings, Inc.; Dominion Retail, Inc.; and Consolidated Natural Gas Company. There are no other publicly held corporations owning ten percent or more of DNC's stock.

Respectfully submitted,



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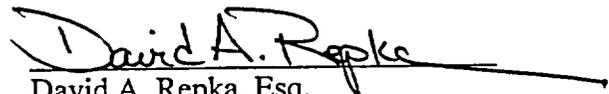
CERTIFICATE OF SERVICE

I hereby certify that copies of "MOTION OF DOMINION NUCLEAR CONNECTICUT, INC. FOR LEAVE TO INTERVENE" and the "CORPORATE DISCLOSURE STATEMENT" in the captioned proceeding have been served as shown below by United States mail, first class, this 11th day of March 2003, on the following:

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