



associated electric cooperative, inc.

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12/15/07

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March 23, 2009

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Chief, Rulemaking, Directives and Editing Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

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Dear Chief:

Re: Federal Register Notice ²³14 January 2009 (Page 4257-4258), [Docket No. 52-037; NRC-2008-0556]

Associated Electric Cooperative (AECI) is the wholesale power supplier for six regional generation and transmission cooperatives (G&Ts) and 51 local distribution cooperatives in Missouri, southeast Iowa and northeast Oklahoma. AECI is operated on a not-for-profit basis to provide at-cost electric service and is governed by a board of directors democratically elected from the membership. AECI is committed to providing reliable, affordable, and environmentally responsible power to more than 850,000 member-consumers.

Recently, AECI evaluated technologies related to base load generation. Among the technologies considered were renewables (i.e. wind, solar, geothermal, biomass, and hydro), energy efficiency, petroleum, natural gas, circulating fluidized bed (CFB), integrated gasification combined cycle (IGCC), pulverized coal (PC), and nuclear. At the time, nuclear generation was eliminated from consideration primarily because the substantial capital investment would have significantly constrained the financial flexibility of the cooperative. The remaining alternatives were eliminated due to concerns over availability, reliability, and/or fuel cost volatility. In the end, only pulverized coal remained as a viable option for AECI. Since the time that this evaluation was completed, AECI has concluded that nuclear power is a viable option to meet a portion of the cooperative's future base load needs.

As AECI moves forward to meet the mission of supplying an economical and reliable power supply to our member-owners, we'll do so with a mix of alternatives. We expect nuclear energy to be an option in this mix. We believe nuclear generation should be encouraged and available to AECI either in the form of a minority ownership stake or in the form of affordable purchased power from neighboring utilities like Ameren UE.

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In closing, Associated submits that a need and alternatives analysis under an EIS for Callaway Unit 2 will rightly show the necessity for the project. It is time to invest in safe, reliable, affordable, and environmentally responsible electrical generation. AECI supports the ongoing efforts of the NRC toward approval of a combined license for Callaway Unit 2.

Sincerely,



James J. Jura
CEO and General Manager

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