

Case 14-E-0270

Petition Requesting Initiation of a
Proceeding to Examine a Proposal for
Continued Operation of the R.E. Ginna
Nuclear Power Plant, LLC.

Hearing Exhibit 21

Rochester Gas and Electric Corporation

**Petition for Initiation of a Proceeding to Examine a Proposal for Continued Operation of
the R.E. Ginna Nuclear Power Plant
Case 14-E-0270**

INFORMATION REQUEST

Requesting Party: Multiple Intervenors (2)

Request No.: GNP-15-002

Date of Request: March 12, 2015

Response Due: March 23, 2015

Date of Reply: March 23, 2015

Respondent: Timothy J. Lynch

Re: Multiple Intervenors' First Set of Information Requests

Question:

To the extent Rochester Gas and Electric Corporation ("RG&E") engages in electric reliability planning activities, do such activities include analyses of the possible deactivation of electric generation facilities within its service territory?

If the above question is answered in the affirmative, identify: (a) when such analyses take place; (b) how electric generation facilities are chosen for such analyses; (c) the electric generation facilities for which such analyses were undertaken in the last ten years; (d) when RG&E decided to analyze the possible deactivation of the R.E. Ginna nuclear power plant ("Ginna"); and (e) the basis for RG&E's decision to analyze the possible deactivation of Ginna.

If the initial question above is answered in the negative, explain why RG&E's electric reliability planning activities do not include analyses of the possible deactivation of electric generation facilities within its service territory.

Response:

RG&E objects to this interrogatory because it requests information that is irrelevant and outside the scope of the current phase of this proceeding (i.e., the interrogatory seeks information that does not "involv[e] the request of RG&E for Commission acceptance of a Reliability Support Services Agreement between RG&E and R.E. Ginna Nuclear Power Plant, LLC, and for approval of the allocation and recovery of the costs of that agreement.")

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RG&E also objects to this information request as overly broad, unduly burdensome and not tailored to this particular proceeding as it requests information that is not related to the Ginna Facility and/or requests information relating to a time period prior to the commencement of this proceeding that resulted in the RSSA at issue.

RG&E further objects to this information request because the term “deactivation” is vague and ambiguous. For purposes of responding to this request, RG&E is interpreting the term “deactivation” to mean the permanent retirement of an electric generation facility.

Subject to and without waiving these objections, RG&E provides the following response:

Yes.

- a) Analyses are completed pursuant to a request from the New York State Department of Public Service (“NYDPS”).
- b) The NYDPS requests generation retirement studies when it receives a notice of retirement from a generator. The NYDPS may also request other special studies.
- c) Ginna and, prior to 2015, analyses were undertaken for the proposed retirement of Station 9 CT, Russell Station, and Beebee Station.
- d) RG&E was requested by Exelon Corporation to participate with the NYISO in an analysis of the retirement of Ginna in January 2014.
- e) RG&E and the NYISO analyzed the retirement of Ginna pursuant to a request from Exelon Corporation.