

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 33

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 and No: Multiple Intervenors (MI-42)

Request No.: GNP-15-143

Date of Request: April 27, 2015

Response Due: May 7, 2015

Date of Reply: May 7, 2015

Respondent: Timothy Lynch

Re: Multiple Intervenors Six Set of Information Requests

Question:

How many employees does Rochester Gas and Electric Corporation (“RG&E”) have that are responsible for and/or capable of performing reliability planning, such as the potential impacts of a generator retirement on the RG&E electric system and service territory? Has that number of employees varied since the beginning of 2013 and, if so, how?

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.”)

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

There are currently five System Planning employees that are capable of performing reliability planning for the RG&E electric system and service territory. During 2013, the department consisted of six System Planning employees.