

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 29

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-31)

Request No.: GNP-15-066

Date of Request: March 26, 2015

Response Due: April 6, 2015

Date of Reply: April 6, 2015

Respondent: Timothy Lynch

Re: Multiple Intervenors Third Set of Information Requests

Question:

In response to Multiple Intervenors Information Request No. 4, Rochester Gas and Electric Corporation (“RG&E”) states, in pertinent part, that: “RG&E was generally aware of trade press articles speculating on the financial condition of the Ginna facility. However, the New York State Public Service Commission has an established notification process for generator retirements and RG&E properly relies on those procedures.”

Is it RG&E’s position that it was under no obligation to analyze the potential deactivation of the R.E. Ginna nuclear power plant (“Ginna”) in response to “trade press articles speculating on the financial condition of the Ginna facility”? Did RG&E consider performing such analyses in response to such “trade press articles”? If yes, why did it choose not to perform such analyses?

What does RG&E mean specifically when it states that it “properly relies” on the notification process for generator retirements established by the New York State Public Service Commission (“Commission”)? Is it RG&E’s position that it need not analyze the reliability impacts of a possible generator retirement unless and until notice of such a retirement is filed with the Commission? Explain the response.

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 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.

As noted in its response to GNP-15-004 (MI-4), RG&E met with Ginna representatives as late as October 2013 and RG&E was provided no indication at that time of a possible Ginna retirement. Please see the confidential internal RG&E report provided as Attachment 3 to GNP-15-003 (MI-3). RG&E believes it has an obligation to examine the reliability implications of an early generation retirement when it becomes known, through a formal generator retirement announcement or, as in the case of Ginna, when a generator directly indicates to the company that a facility may be permanently retired.