

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 23

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 (13)

Request No.: GNP-15-013

Date of Request: March 12, 2015

Response Due: March 23, 2015

Date of Reply: March 23, 2015

Respondent: J. Converse & D. Kimiecik

Re: Multiple Intervenors' First Set of Information Requests

Question:

Identify and describe all conversations and any other communications between Rochester Gas and Electric Corporation (including its agents and representatives) ("RG&E") and the owner of the R.E. Ginna nuclear power plant (including its agents and representatives) ("Ginna") regarding the possible deactivation of Ginna that took place prior to the filing of the petition initiating this proceeding. When did such communications first commence? Who participated in such communications on behalf of RG&E? Who participated in such communications on behalf of Ginna? Were any parties other than RG&E and Ginna involved in such communications? If so, identify all such parties and describe their participation in the communications.

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 involve 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.")

RG&E also objects to this interrogatory as overly broad, unduly burdensome and not tailored to this particular proceeding as it requests information relating to a time period prior to the commencement of this proceeding.

RG&E further objects to this interrogatory 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 generating facility.

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

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

Representatives for RG&E (David Kimiecik, Mark Lynch, James Lahtinen, R. Scott Mahoney and Jeffrey Rosenbloom) participated in a meeting on January 20, 2014 with Ginna representatives. During the January 23, 2014 meeting, Ginna representatives described the current financial condition of Ginna and, for the first time, articulated the potential for the permanent retirement of Ginna and the need for a reliability study.

RG&E began meeting with Ginna via teleconference in February 2014 to generally discuss the structure of an RSSA. Subsequent meetings, prior to the filing of the petition, were similar in nature.

On occasion, New York State Department of Public Service Staff (“DPS Staff”) facilitated the discussions between RG&E and Ginna. Any questions regarding the DPS Staff’s role in facilitation of the RSSA negotiations should be directed to DPS Staff.

Any questions regarding the Ginna representatives should be directed to Ginna.

See also responses to GNP-15-004, GNP-15-007 and GNP-15-008.