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March 25, 2008

BY EMAIL

Tony Petrella
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George Vegh
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Dear Mr. Petrella and Mr. Vegh:

Re: Pollution Probe – Request for Historical Information to Fill In Gap for Pollution Probe Interrogatory Nos. 1 and 2
EB-2007-0050 – Hydro One – Bruce-Milton Transmission Reinforcement Project

We write to you as the listed representatives for Ontario Power Generation Inc. and Bruce Power respectively for this matter. We are writing on behalf of Pollution Probe to request that OPG and Bruce Power provide the historical information to fill in the gap for 1984 to about 2002 that exists in the current responses to Pollution Probe Interrogatory Nos. 1 and 2.

We are corresponding in parallel to Pollution Probe's currently pending motion dated March 20, 2008 with the hope that the section dealing with the Historical Information Interrogatories can be resolved through discussion so that that portion of the motion will no longer be necessary. We are also corresponding further to Hydro One's counsel suggestion that Pollution Probe attempt to obtain this information directly from you.[1]

As detailed in Pollution Probe's motion, it appears that the Board has broad powers to ensure that all arguably relevant information is before it. Such arguably relevant information appears to include the information sought in Pollution Probe Interrogatory Nos. 1 and 2 (particularly since Hydro One provided what it was able to obtain from about 2002 on). The only issue thus appears to be how and when Pollution Probe will obtain the remainder of the information.

[1] See letter from Hydro One's counsel dated March 10, 2008 [Poll. Probe Motion Record – Tab 2G, page 34].

We suggest that the most expedient and efficient resolution would be for Pollution Probe to receive this information from yourselves as soon as possible so that Pollution Probe can prepare its case and evidence appropriately and economically. For example, if the requested information only became available during the hearing as a result of a ruling on the motion, Pollution Probe would likely need to seek an adjournment depending on the implications of the information in order to properly review, analyze, and possibly respond to the information. On the other hand, if the information is provided as soon as possible, the hearing can proceed without the request for an adjournment. We respectfully suggest that the latter option is far more practical and preferable compared to the former option.

If you require further information, we suggest that you review the sections of Pollution Probe's motion dated March 20, 2008 regarding the Historical Information Interrogatories. In addition, we also include copies of Pollution Probe Interrogatory Nos. 1 and 2 and Hydro One's current responses for your ease of reference.

We hope that you will be of assistance, and we look forward to your response.

Yours truly,

Basil Alexander

BA/ba

Encl.

cc: Board Secretary by courier (10 copies) and email
Applicant and Intervenors per Procedural Order #5

Pollution Probe INTERROGATORY #1 List 1

Interrogatory

Issue Number: 1.0
Issue: Project Need and Justification

Ref. B/Tab 1/Sch 1

For each month from January 1984 to the present, please state:

a) the installed capacity at the Bruce Nuclear Station;

b) the total monthly output (MWh) of the Bruce Nuclear Station;

c) the peak hour output (MW) of the Bruce Nuclear Station; and

d) the average capacity factor of the Bruce Nuclear Station.

Response

As noted in Hydro One's earlier correspondence dated February 26, 2008 to the Board and parties, generation production data prior to market opening is not available. The production data from market opening to the present is as follows:

	Bruce A				Bruce B			
Year / Month	Capacity (MW)	Total Monthly Output (MWh)	Peak Hourly Output (MW)	Average Capacity Factor (%)	Capacity (MW)	Total Monthly Output (MWh)	Peak Hourly Output (MW)	Average Capacity Factor (%)
200205					3,180	1,717,900	2,398	73
200206					3,180	1,709,508	2,394	75
200207					3,180	1,766,080	2,402	75
200208					3,180	1,812,964	3,132	77
200209					3,180	1,951,634	3,179	85
200210					3,180	1,766,045	2,387	75
200211					3,180	1,711,077	2,390	75
200212					3,180	1,787,511	2,947	76
200301					3,180	2,353,939	3,187	99
200302					3,180	2,134,663	3,190	100
200303					3,180	2,362,288	3,237	100
200304					3,180	1,802,961	3,191	79
200305					3,180	1,773,058	2,395	75
200306					3,180	1,775,117	3,122	78
200307					3,180	2,320,372	3,181	98
200308					3,180	2,122,785	3,190	90
200309					3,180	2,062,760	3,172	90
200310					3,180	1,751,470	2,380	74
200311	770	383,794	716	69	3,180	1,653,791	2,386	72
200312	770	525,370	712	92	3,180	1,675,077	2,392	71
200401	1,540	586,388	1,395	51	3,180	1,812,649	3,166	77
200402	1,540	601,759	1,428	56	3,180	2,090,206	3,194	94
200403	1,540	768,670	1,502	67	3,180	2,365,452	3,197	100
200404	1,540	1,064,712	1,499	96	3,246	2,240,862	3,213	96

	Bruce A				Bruce B			
Year / Month	Capacity (MW)	Total Monthly Output (MWh)	Peak Hourly Output (MW)	Average Capacity Factor (%)	Capacity (MW)	Total Monthly Output (MWh)	Peak Hourly Output (MW)	Average Capacity Factor (%)
200405	1,540	917,464	1,487	80	3,246	2,384,130	3,217	99
200406	1,540	512,496	744	46	3,246	2,300,882	3,216	98
200407	1,540	984,899	1,501	86	3,246	2,357,266	3,218	98
200408	1,540	1,039,960	1,514	91	3,246	2,275,630	3,220	94
200409	1,540	1,056,785	1,503	95	3,246	1,087,714	3,189	47
200410	1,540	1,106,266	1,500	97	3,246	709,421	1,585	29
200411	1,540	731,772	1,501	66	3,246	1,580,153	2,378	68
200412	1,540	1,097,002	1,491	96	3,246	2,287,976	3,207	95
200501	1,540	694,718	1,488	61	3,246	2,182,061	3,217	90
200502	1,540	506,642	762	49	3,246	2,011,053	3,208	92
200503	1,540	539,828	1,142	47	3,246	2,348,069	3,220	97
200504	1,540	373,831	1,354	34	3,246	1,690,298	3,154	72
200505	1,540	1,020,770	1,518	89	3,246	1,483,067	2,410	61
200506	1,540	1,075,439	1,521	97	3,246	1,741,539	2,473	75
200507	1,540	1,104,661	1,514	96	3,246	1,774,846	2,414	73
200508	1,540	1,084,376	1,513	95	3,246	2,085,252	3,237	86
200509	1,540	862,083	1,512	78	3,246	2,265,513	3,201	97
200510	1,540	1,114,801	1,515	97	3,246	1,922,252	3,180	80
200511	1,540	1,029,189	1,512	93	3,246	1,652,514	2,452	71
200512	1,540	1,041,670	1,514	91	3,246	1,542,761	2,886	64
200601	1,540	1,018,915	1,541	89	3,246	2,294,166	3,205	95
200602	1,540	822,278	1,558	79	3,246	1,972,431	3,219	90
200603	1,540	716,503	1,513	63	3,246	2,373,827	3,218	98
200604	1,540	931,815	1,523	84	3,246	2,217,925	3,210	95

	Bruce A				Bruce B			
Year / Month	Capacity (MW)	Total Monthly Output (MWh)	Peak Hourly Output (MW)	Average Capacity Factor (%)	Capacity (MW)	Total Monthly Output (MWh)	Peak Hourly Output (MW)	Average Capacity Factor (%)
200605	1,540	556,142	760	49	3,246	2,269,594	3,237	94
200606	1,540	615,891	1,448	56	3,246	2,167,307	3,237	93
200607	1,540	927,894	1,504	81	3,246	2,366,508	3,245	98
200608	1,540	1,047,600	1,509	91	3,246	2,360,548	3,242	98
200609	1,540	902,005	1,516	81	3,246	1,826,177	3,245	78
200610	1,540	1,104,292	1,498	96	3,246	1,782,500	2,434	74
200611	1,540	1,019,454	1,501	92	3,246	1,890,090	3,292	81
200612	1,540	1,105,726	1,497	97	3,246	2,394,197	3,266	99
200701	1,540	1,102,006	1,489	96	3,246	2,152,489	3,242	89
200702	1,540	992,764	1,487	96	3,246	1,609,360	2,410	74
200703	1,540	838,342	1,495	73	3,246	1,693,787	2,509	70
200704	1,540	677,921	1,553	61	3,365	2,095,669	3,272	86
200705	1,575	726,958	1,541	62	3,365	2,257,257	3,237	90
200706	1,575	1,101,020	1,547	97	3,365	2,049,804	3,266	85
200707	1,575	1,030,478	1,553	88	3,365	2,363,992	3,228	94
200708	1,575	1,099,698	1,518	94	3,365	2,184,157	3,218	87
200709	1,575	620,465	1,523	55	3,365	2,284,742	3,225	94
200710	1,575	534,210	740	46	3,365	2,313,492	3,214	92
200711	1,575	685,278	1,459	60	3,365	2,123,964	3,282	88
200712	1,575	1,060,920	1,523	91	3,365	2,260,175	3,277	90
200801	1,575	1,103,638	1,496	94	3,365	2,274,749	3,324	91

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Pollution Probe INTERROGATORY # 2 List 1

Interrogatory

Issue Number: 1.0
Issue: Project Need and Justification

Ref. B/Tab 1/Sch 1

For each year from 1984 to the present, please state:

a) the annual output (MWh) of the Bruce Nuclear Station;

b) the peak hour output (MW) of the Bruce Nuclear Station;

c) the average annual capacity factor of the Bruce Nuclear Station; and

d) the average annual capacity factor for each unit of the Bruce Nuclear Station.

Response

As noted in Hydro One's earlier correspondence dated February 26, 2008 to the Board and parties, generation production data prior to market opening is not available. The production data requested from market opening to the present is as follows:

a) to c)

	Bruce A				Bruce B		
Year	Annual Output (MWh)	Peak Hourly Output (MW)	Average Annual Capacity Factor (%)		Annual Output (MWh)	Peak Hourly Output (MW)	Average Annual Capacity Factor (%)
2002					14,222,719	3,179	76
2003	909,164	716	81		23,788,282	3,237	85
2004	10,468,173	1,514	77		23,492,341	3,220	83
2005	10,448,007	1,521	77		22,699,224	3,237	77
2006	10,768,517	1,558	80		25,915,270	3,292	88
2007	10,470,060	1,553	76		25,388,887	3,282	86
2008	1,103,638	1,496	94		2,274,749	3,324	91

d) The average annual capacity factory for each unit at the Bruce Nuclear Station is as follows:

Year	Bruce A Units Avg. Annual Capacity Factor (%)					Bruce B Units Avg. Annual Capacity Factor (%)			
	1	2	3	4		1	2	3	4
2002						98	51	55	99
2003				81		76	97	96	71
2004			74	81		85	75	92	82
2005			73	82		74	77	69	99
2006			81	79		97	95	93	76
2007			73	78		94	69	96	90
2008			92	96		97	96	86	85