

Fallis Group , “AMENDED” INTERROGATORIES, List 2

APRIL 23RD, 2008

Issue Number; 1.0

Issue: **Project Need and Justification**

Ref. Exhibit C, Tab 2,
Response of HONI April 10, 2008 to *Pollution Probe INTERROGATORY # 1, List 1*

Fallis Group , INTERROGATORY# 1, List 2

Issue Number; 1.0

Issue: **Project Need and Justification**

Ref. Exhibit C, Tab 2,
Response of HONI April 10, 2008 to *Pollution Probe INTERROGATORY # 1, List 1*

Reference to:

- THE HISTORIC *BRUCE 'A' & BRUCE 'B'* POWER GENERATION TABLES DELIVERED BY *HONI*, ON APRIL 10TH, 2008, IN COMPLIANCE WITH THE BOARD ORDER OF APRIL 8TH, 2008 TO PRODUCE THAT INFORMATION FROM JANUARY 1984 TO THE PRESENT.

1.A WOULD *HONI* PLEASE NOW CAUSE THE IMMEDIATE PRODUCTION AND DELIVERY OF ALL BRUCE GENERATION PRODUCTION DATA FROM 1977 TO 1983 ?

1.B WERE THE HISTORIC *BRUCE 'A' & BRUCE 'B'* POWER GENERATION TABLES DELIVERED BY *HONI*, ON APRIL 10TH, 2008 IN THE CONTROL OF BRUCE POWER AND DELIVERED BY BRUCE POWER TO *HONI* AS A RESULT OF A WRITTEN REQUEST MADE BY *HONI* BY BRUCE POWER, IT AGENT(S) AND OR ITS SOLICITORS ?

1.C WOULD *HONI* PLEASE PRODUCE COPIES OF ALL CORRESPONDENCE EXCHANGED BETWEEN *HONI*, THE *OPA* , AND / OR *IESO* AND BRUCE POWER, IT AGENT(S) AND/OR ITS SOLICITORS, BETWEEN SEPTEMBER 15TH, 2007 AND APRIL 7TH, 2008 , IN WHICH A REQUEST WAS MADE FOR PRODUCTION OF ALL BRUCE GENERATION RECORDS FOR EACH REACTOR AT THE BRUCE, THAT ALLOWED ~~BETWEEN~~ *HONI*, THE *OPA* , AND / OR *IESO* TO CONCLUDE, AS THEY DID, THAT NO HISTORIC BRUCE GENERATION EVIDENCE WAS AVAILABLE BEFORE 2002 ?

1.D WOULD *HONI* PLEASE PRODUCE COPIES OF ALL CORRESPONDENCE EXCHANGED BETWEEN *HONI*, THE *OPA* , AND / OR *IESO* AND BRUCE POWER, IT AGENT(S) AND/OR ITS SOLICITORS, BETWEEN APRIL 8TH, 2008 AND APRIL 10TH, 2008 , IN WHICH A REQUEST WAS MADE FOR PRODUCTION OF ALL BRUCE GENERATION RECORDS FOR EACH REACTOR AT THE BRUCE, THAT ~~ALLOWED BETWEEN~~ *HONI*, THE *OPA* , AND / OR *IESO* AS A RESULT OF WHICH RESULTED IN THE PRODUCTION BY HONI OF HISTORIC GENERATION DATA WAS PRODUCED BETWEEN 1984 AND 2008?

Fallis Group , INTERROGATORY# 2, List 2

Issue Number; 1.0

Issue: **Project Need and Justification**

Ref. Exhibit C, Tab 2,

Response of HONI April 10, 2008 to *Pollution Probe INTERROGATORY # 1, List 1*

Reference to:

- ***“INTERNATIONAL ATOMIC ENERGY AGENCY” , (‘IAEA’) POWER GENERATION TABLES (“OPERATING EXPERIENCE HISTORY”), SETTING OUT THE ANNUAL CAPACITY OF EACH OF NINE REACTORS AT THE BRUCE FROM INCEPTION TO 2006, INCLUDING DOUGLAS POINT, AND BRUCE UNITS ‘1 - 8. ATTACHED HERETO AS SCHEDULE ‘1’***

- 2.A.** DOES *HONI* AGREE THAT THE INFORMATION CONTAINED IN THE *OPERATING EXPERIENCE HISTORY* of *IAEA* FOR EACH REACTOR AT THE BRUCE SINCE INCEPTION TO 2006 INCLUDING *DOUGLAS POINT, AND BRUCE UNITS ‘1 - 8. ATTACHED HERETO AS SCHEDULE ‘1’, IS ACCURATE AND MAY BE RELIED UPON BY THE BOARD, BOARD STAFF, THE APPLICANT AND ALL INTERVENERS IN THIS APPLICATION (AS ATTACHED HERETO AS SCHEDULE ‘1’) ?*
- 2.B** DOES *HONI* NOW AGREE THAT THE INFORMATION AVAILABLE TO THE PUBLIC ON THE *IAEA* WEBSITE WHICH DISCLOSES HISTORIC GENERATION AND OPERATIONAL INFORMATION FOR EACH REACTOR AT THE BRUCE SINCE INCEPTION TO 2006 INCLUDING *DOUGLAS POINT, AND BRUCE UNITS ‘1 - 8, WAS KNOWN TO HONI, THE OPA, IESO, OPG AND/OR BRUCE POWER, AND THAT THE STATEMENT OF HONI THAT SUCH HISTORIC INFORMATION BEFORE 2002 WAS NOT AVAILABLE. WAS INCORRECT AND FALSE ?*

Fallis Group , INTERROGATORY# 3, List 2

Issue Number; 1.0

Issue: **Project Need and Justification**

Ref. Exhibit C, Tab 2,
Response of HONI April 10, 2008 to *Pollution Probe INTERROGATORY # 1, List 1*

Reference to:

- ***“INTERNATIONAL ATOMIC ENERGY AGENCY” , (‘IAEA’) POWER GENERATION TABLES (“OPERATING EXPERIENCE HISTORY”), SETTING OUT THE ANNUAL CAPACITY OF EACH OF NINE REACTORS AT THE BRUCE FROM INCEPTION TO 2006, INCLUDING DOUGLAS POINT, AND BRUCE UNITS ‘1 - 8. ATTACHED HERETO AS SCHEDULE ‘1’***
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3.A WOULD *HONI* AGREE THAT UNTIL 1979, NO 500 KV LINE HAD YET BEEN PLACED INTO SERVICE FROM THE BRUCE GS AND DOUGLAS POINT GS, AND IF NOT WHY NOT ?

3.B WOULD *HONI* AGREE THAT UNTIL 1979 THE ONLY TRANSMISSION LINES LEAVING BRUCE GSS WERE AS FOLLOWS

- | | | |
|------|---------------------------------------|----------------------------|
| I. | 230 KV - BRUCE TO HANOVER/ORANGEVILLE | - IN SERVICE NOV. 26, 1963 |
| II. | 230 KV - BRUCE TO DETWEILER | - IN SERVICE OCT. 11, 1975 |
| III. | 230 KV - BRUCE TO OWEN SOUND | - IN SERVICE OCT. 31, 1977 |

AND IF NOT WHY NOT ?

3.C WOULD *HONI* AGREE THE 500 KV LINE FROM BRUCE TO MILTON FIRST OPERATED AS A 230KV LINE TO BELWOOD JUNCTION TO ADD CAPACITY BEFORE CONSTRUCTION OF 500KV LINE TO MILTON WAS COMPLETED, AND IF NOT WHY NOT ?

3.D WOULD *HONI* AGREE THAT BEFORE 1979, THE GENERATION CAPACITY OF :

DOUGLAS POINT UNIT AND BRUCE UNITS “ 1 - 2” WAS 1,646 MWe IN 1977, AND
DOUGLAS POINT UNIT AND BRUCE UNITS “ 1 - 3” WAS 2,426 MWe IN 1978

AND IF NOT WHY NOT ?

3.E WOULD *HONI* AGREE BEFORE 1979 THREE (3) 230 KV LINES TRANSMITTED ALL OF THE NET GENERATION CAPACITY AVAILABLE FROM THE GROSS CAPACITY OF 2,426 MWe BEFORE ANY 500 KV LINES WERE BUILT, AND IF NOT WHY NOT ?

- 3.F** WOULD *HONI* AGREE IN 1979 THE 500 KV BRUCE TO MILTON LINE WAS OPERATED AS A 230 KV UNTIL APRIL 1, 1983, AND DOUGLAS POINT AND BRUCE '1 - 4' ~~GENERATED~~ HAD A COMBINED GENERATION CAPACITY OF 3,166 MWe EXCEPT FOR 1980 WHEN THEY ~~GENERATED~~ ~~GENERATED~~ HAD A COMBINED GENERATION CAPACITY OF 3,090 MWe, AND IF NOT WHY NOT ?
- 3.G** WOULD *HONI* AGREE THAT FROM 1987 TO 1995 THE GENERATION CAPACITY OF ALL 8 UNITS AT THE BRUCE WAS AS LOW AS 6,745 MWe TO A HIGH OF 6,832 MWe, AND IF NOT WHY NOT ?
- 3.H** WOULD *HONI* AGREE THAT THE ATTACHED 2 PAGE SUMMARY OF THE "OPERATING EXPERIENCE HISTORY OF THE REACTOR UNITS AT DOUGLAS POINT AND BRUCE "1-8 FROM 1977 TO 2006", IS AN ACCURATE SUMMARY OF THE GENERATION CAPACITY OF EACH OF THOSE 9 REACTOR UNITS IN EACH OF THE CALENDAR YEARS FORM 1977 TO 2006 AS BASED UPON THE INFORMATION PROVIDED BY IAEA, (2 PAGE SUMMARY ATTACHED AT SCHEDULE "2' ATTACHED, AND IF NOT WHY NOT ?

Fallis Group , INTERROGATORY# 4, List 2

Issue Number; 1.0

Issue: **Project Need and Justification**

Issue: **Reliability and Quality of Service**

Ref. **10 YEAR OUTLOOK - AN ASSESSMENT OF THE ADEQUACY OF GENERATION AND TRANSMISSION FACILITIES TO MEET FUTURE ELECTRICITY NEEDS IN ONTARIO - FORM JANUARY 2006 TO DECEMBER 2018 - (PREPARED BY IESO) (THE "IESO REPORT")**

4.A WHAT ARE THE NAMES AND ADDRESSES OF THE TOP 3 EXPERTS OR OTHER PERSONS WHO SIGNED OFF ON AND APPROVED THE WORDING AND THE TECHNICAL CONCLUSIONS FOUND IN THE ENTIRETY OF SECTION 4.6 **BRUCE COMPLEX** OF THE *IESO REPORT* ?

4.B IN REFERENCE TO 4.A ABOVE, ARE THOSE SAME PERSONS NOW EMPLOYED BY *IESO* AND, IF SO, WILL *HONI* NOW COMMIT IN WRITING TO PRODUCE AND THOSE PERSONS TO ALLOW THEM TO BE TESTED UPON THEIR FINDINGS BY THE INTERVENERS, AND IF NOT WHY NOT ?

4.C WHAT ARE THE NAMES AND ADDRESSES OF THE TOP 3 EXPERTS OR OTHER PERSONS WHO SIGNED OFF ON AND APPROVED THE WORDING AND THE TECHNICAL CONCLUSIONS FOUND IN THE ENTIRETY OF SECTION 5.0 **COAL REPLACEMENT PLAN**, OF THE *IESO REPORT* ?

4.D IN REFERENCE TO 4.C ABOVE, ARE THOSE SAME PERSONS NOW EMPLOYED BY *IESO* AND, IF SO. WILL *HONI* NOW COMMIT IN WRITING TO PRODUCE AND THOSE PERSONS TO ALLOW THEM TO BE TESTED UPON THEIR FINDINGS BY THE INTERVENERS, AND IF NOT WHY NOT ?

Fallis Group , INTERROGATORY# 5, List 2

Issue Number; 1.0

Issue: **Project Need and Justification**

Issue: **Reliability and Quality of Service**

REFERENCE: **INTERROGATORIES OF THE FALLIS GROUP FILED AS EXHIBIT 'C' TAB '3' AS SCHEDULE 1 - 107**

5.A AS *HONI* HAS NOW PRODUCED HISTORIC GENERATION AND TRANSMISSION INFORMATION ON APRIL 10TH, 2008 PURSUANT TO PROCEDURAL ORDER NO. 9 OF THE BOARD ISSUED ON APRIL 8TH, NOTWITHSTANDING THAT *HONI, THE OPA AND IESO* STATED THAT SUCH INFORMATION WAS NOT AVAILABLE, AND IN VIEW OF THE FACT THAT ON APRIL 7TH, 2008 THE EXPERT RETAINED BY THE FALLIS GROUP AND THE ROSS GROUP WAS ABLE TO PROCURE HISTORIC INFORMATION FROM *IAEA* OTHERWISE PUBLICALLY AVAILABLE ON THE WEB, THE FALLIS GROUP NOW REQUESTS THAT *HONI* PROVIDE ANSWERS TO THE FOLLOWING PREVIOUS INTERROGATORIES AS SUBMITTED AND REJECTED BY *HONI* AS REQUIRING ON THE GROUNDS THAT HISTORIC INFORMATION BEFORE 2002 WHICH WAS NOT AVAILABLE;

NAMELY : INTERROGATORY NOS. 1-2, 7-8, 11-12, 17-23A, 26-28, 30, 32-35, 42, 46, 58, 70, 84, 85-86, 90-95, 101, 103, 107(B), 107(D), 107(E) & 107 (g)