Energy Probe Interrogatory #24

Interrogatory

Reference:
Exhibit D2, Tab 2, Schedule 7, Page 17, Chart 6

Chart 6: Remaining Units Fuel Handling and Defuelling Bundle Costs

Description	Forecast Costs ($M)					
	Unit 3 2024	%	Unit 1 2025	%	Unit 4 2026	%
Defuelling	6.6	38%	1.1	13%	1.2	22%
Fuel Handling	1.4	8%	0.0	0%	0.0	0%
OPG Project Management	9.4	54%	7.3	87%	4.2	78%
Total	**17.3**	**100%**	**8.5**	**100%**	**5.4**	**100%**
Note that all numbers are in dollars of the year, i.e. including interest and escalation in each line item.						

a) Please explain why the Defueling cost for Unit 3 is much higher than for Units 1 and 4.

b) Please explain why there are no costs for Fuel Handling for Units 1 and 4.

c) Please explain why OPG Project Management costs are much higher for Units 3 and 1 than for Unit 4.

Response

a) The cost of defueling shown in Ex. D2-2-7, p. 17, Chart 6, is projected to be higher for Unit 3 than for Units 1 and 4 because, by applying Lessons Learned from Units 2 and 3, the need for engineering, technical support and additional tools and equipment is projected to be substantially reduced for Units 1 and 4 compared to Unit 3. Further, there are items purchased to mitigate potential risks during Unit 3 defueling that are expected to be available for re-use on Units 1 and 4.

b) Both Fuel Handling and OPG Project Management in the referenced chart are OPG resources. At the time of this estimate, the costs labelled Fuel Handling in the above chart had not been separated out from the remainder of the OPG Project Management costs for Units 1 and 4. The Fuel Handling costs are in the row of the table labelled “OPG Project Management” for Units 1 and 4.

c) Please see part a) re: Lessons Learned. Also contributing to the OPG Project Management costs being higher for Unit 3 than for Units 1 and 4 was the delayed start of Unit 3 (prior to the deferrals as a result of COVID-19) as a result of the delayed finish of the Unit 2 refurbishment outage. During this period, experienced staff were retained and continued to prepare for defueling Unit 3 as it is the first activity in a refurbishment outage and is on the critical path.