Energy Probe Interrogatory #30

Interrogatory

Reference:
Exhibit D2, Tab 2, Schedule 8, page 1

Preamble: "This exhibit describes the methods by which OPG, as the Program owner, will manage the delivery of all scope for Units 3, 1, and 4 ("the Remaining Units") safely, on time, on budget, and to the required quality."

a) Does the word "delivery" mean in-service?

b) Does the word "safely" mean with no injuries?

c) What are the "on time" dates for the delivery of each remaining unit?

d) What does the term "on budget" mean? Please provide reference to specific dollar amounts.

Response

a) The word "delivery" means that the scope planned for Unit 3, 1, and 4 ("the Remaining Units") will be executed during their respective refurbishment outages, thereby allowing the units to be returned to service to continue safe and reliable operation.

b) "Safely" means that, OPG will manage the Units 3, 1, and 4 refurbishment outages so that they are executed safely and meet or exceed OPG's safety performance targets.

c) Please refer to Ex. D2-2-5, Section 3.1, Figure 2, p. 6, for each of the Remaining Units' high confidence return-to-service dates. Achievement of these dates equates to "on-time" performance.

d) "On budget" means that the Remaining Units are completed within the high confidence envelope amount of $6,604.2M. See Ex. D2-2-7, p. 2, lines 5-10.