Energy Probe Interrogatory #39

Interrogatory

Reference:
Exhibit D2, Tab 2, Schedule 11, Attachment 1, pages 6 and 17

a) Did Pegasus-Global request to review those Policies and Procedures? If the answer is yes, please file the document requesting Policies and Procedures. If the answer is no, how can Pegasus-Global be confident that it reviewed all relevant Policies and Procedures?

b) Please file a list of all other OPG documents that were provided to Pegasus-Global.

Response

This response was prepared by Pegasus-Global Holdings Inc. ("Pegasus-Global"):

a) Yes. The policies and procedures reviewed and discussed within Dr. Galloway's testimony were provided in response to a verbal request from Pegasus-Global for OPG to provide any new or updated policies and procedures from those reviewed during the prior Unit 2 assessment in EB-2016-0152.

b) See Attachment 1.