Environmental Defence Interrogatory #9

Interrogatory

Reference:
Reference: Exhibit F2, Tab 1, Schedule 1

Preamble: The benchmarking indicates "3-Year Total Generating Costs per MWh ($ per Net MWh)" of $62.39 for Pickering

Questions:

(a) For each of the past 5 years, please provide a table showing Ontario's 40 highest electricity demand hours, in order, and for each of those hours indicate: (i) whether Pickering was in service; (ii) its output; (iii) if it was not in-service, in whole or in part, whether that was planned or unplanned; and (iv) which units were out-of-service.
(b) For each of the past 5 years, please provide the number of hours in which Pickering was not fully in-service due to: (i) a planned outage; and (ii) an unplanned outage.
(c) If Pickering is out-of-service due to an unplanned outage at the time of peak electricity demand in Ontario, how is that deficit in electricity supply made up?
(d) If Pickering is out-of-service due to a planned outage at the time of peak electricity demand in Ontario, how is that deficit in electricity supply made up?
(e) For the purpose of estimating resource adequacy, what percent of the time is Pickering assumed to be in service?
(f) For the purpose of estimating resource adequacy, is Pickering's capacity assumed to be available at 100% or a lesser amount?

Response

(a) (c) (d) (e) and (f)

OPG declines to respond on the basis of relevance. The questions seek system planning information that is not relevant to deciding any issue before the OEB in this application. See Ex. L-F2-01-Environmental Defence-10 c).

(b) Refer to Chart 1.

Chart 1 - Pickering Not-in-Service Hours 2016-2020

	Planned Outage (hrs)	Unplanned Outage (hrs)
2016	8,864	2,904
2017	7,789	1,645
2018	8,333	1,703
2019	5,600	300
2020	10,799	910