

Exhibit RMP___(DMR-3R)

DPU Data Request 59.2

Plant Additions: Huntington U2 Explosion

Please refer to the Company's response to DPU 57.1(e).

- a) Why was the steam inerting system not in service at the time of the explosion?
- b) Why was the steam inerting system not scheduled to be commissioned until December 5th 2011?
- c) What is the difference between "installed" and "commissioned" as it relates to the steam inerting system?
- d) Please explain why the steam inerting system was not commissioned as part of the fall 2011 overhaul.
- e) Please explain how waiting until December 5, 2011 to commission the steam inerting system was a more prudent course of action compared to commissioning it prior to unit operation.
- f) What is the Company's policy with regards to commissioning preventative controls (such as the steam inerting system) in relation to completing overhauls or other maintenance?
- g) Was waiting until December 5th 2011 to commission the steam inerting system in violation of any Company (or other party such as a manufacturer or regulatory body) policy, procedure, standard, recommendation or pre-established plan that specified when this control was to be or should have been commissioned? If yes, please specify what policy, procedure, etc, was violated.
- h) Were any safety policies or standards violated by not having the steam inerting system in-service at the time the explosion occurred or any time before then? If yes, please specify the policies and or procedures that were violated.

Response to DPU Data Request 59.2

- a) Huntington 2 was not originally built with a steam inerting system and a project was developed to design, install, and commission a system to prevent mill explosions similar to the events that occurred on November 30, 2011. The steam inerting system was installed during the scheduled Huntington 2 overhaul and was to be finished and commissioned soon after the outage.
- b) After the overhaul there was additional work that needed to be complete before commissioning could begin and to commission the system the unit needed to be online and stable.
- c) Installing the system is the physical work of installation of the piping, valves, dampers, instrumentation, wiring, and control system logic into the DCS, etc. For commissioning of the system, all of the components need to be installed and functionally tested to prove they work as designed.

- d) Some of the equipment was commissioned during the overhaul for instance valves and dampers were connected and stroked for proper operation. However, the system commissioning requires a steam source which is provided by boiler operation.
- e) Commissioning the system before the unit is on line is not possible because the steam from the boiler is required for commissioning.
- f) To get the systems/equipment commissioned as soon as practical. If “...commissioning preventive controls...” can be done during the overhaul, every effort is made to do so.
- g) No.
- h) No. This system was being added to avoid possible issues like the one experienced on November 30, 2011.