

Ontario Power Generation Inc.
EB-2007-0905
UNDERTAKING (J) and EXHIBIT (K) LIST

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J1.1	May 22	To file the Ontario Government Backgrounder announcing prices on electricity from Ontario Power Generation	May 23, 2008
J1.2		To provide calculation showing deficiency provision relating to the forecast portion of the long-term debt on the assumption of 80 basis points for 2008 and 2009.	May 23, 2008
J1.3/ Addendum		To provide an analysis of what is described on Page 19 of the CIBC Report as Option 2 in connection with the test period; show the difference and provide an explanation between the proposed method and the method recommended by CIBC and Option 2 Method in I-2-58.	June 2, 2008/ June 12, 2008
J1.4		Determine if any additional information available to support the statements made paragraph referred to in CIBC Annual Report.	May 23, 2008
J1.5		Provide table similar to Note 10 showing in two parts, one for liability in respect of the prescribed assets and the other in respect of the Bruce Station.	May 30, 2008
J2.1	May 23	To find out if the OPG business case summary was prepared before or after any direction from the Provincial Government	May 27, 2008
J2.2		To provide Specimen Of Project Execution index.	May 26, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J2.3	May 23	To enquire whether the risk management plan is available in template form and produce it, subject to review	May 27, 2008
J2.4		Assess numbers in Exhibit K2.1	May 27, 2008
J2.5		Provide Answer As To Whether Overtimes Costs For 2008 And 2009 Are Based On Historical Average Or Fluctuating Number.	May 26, 2008
J2.6		To List Capital Expenditures (2005-2009) Noting Whether They Are Subject To Regulation 53/05, 6(2)4(I)	May 30, 2008
J2.7		To Identify Assets, Liabilities, Revenues, Costs And Other Items Set Out In OPG's 2007 Financial Statements That Are Referred To In Section 6(2)5 And 6(2)6 Of Regulation 53/05	June 9, 2008
J3.1	May 26	To provide, if possible, congestion-On/-Off History	June 17, 2008
J4.1	May 27	To reconcile amounts in Exhibit F2, tab 1, schedule 1, table 1 with the number in the plan presented to the board of directors	May 30, 2008
J4.2	May 27	To determine whether or not there are documents available that explain the purpose of the advertising reflected in the filing	June 6, 2008
J4.3	May 27	To advise about processing of uranium concentrate to uranium dioxide at Cameco's Blind River plant, and whether there is a difference in processing between the Blind	May 30, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
		River and Port Hope plants	
J4.4	May 27	Provide order of magnitude of different from existing source to eastern European alternative source of supply for fuel bundles	May 30, 2008
J4.5		Provide breakout of SMO gross revenues by category	May 30, 2008
J4.6		To update the first box, "production unit energy costs" in chart 3 from Exhibit A1, tab 4, schedule 3, page 17, using EUCG data for 2007	May 30, 2008
J4.7		Update with 2007 numbers Exhibit L4-2, Appendix 3, page 5	May 30, 2008
J4.8		Update with 2007 numbers Exhibit L4-2, Appendix 3, page 8	May 30, 2008
J4.9		To break out OPG production unit energy cost, 2002-2007, on chart 8 into separate numbers for Pickering A, Pickering B and Darlington	May 30, 2008
J4.10		Updating K4.1, Page 3 with the first quarter results	May 30, 2008
J5.1	May 30	To determine whether OPG can obtain and produce a copy of the supply chain report	June 6, 2008
J5.2		To provide the percentage of labour as against the total OM&A costs	June 2, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J5.3		To determine the US top quartile number that is comparable for 2005	June 3, 2008
J5.4	30 May	Provide the PUEC and the capability factor for first quarter 2008 for each plant	June 2, 2008
J5.5		Board staff to provide source of information used for Bruce data	June 5, 2008
J5.6		Assuming the board were to approve the increase in nuclear OM&A of 559 million as requested in the application, to calculate the necessary fleet-wide capability factor that OPG would need to achieve in order to bring the PUEC back down to the level OPG achieved in 2006, about \$43 per megawatt-hour, as shown on page 8 of exhibit 4.2	June 13, 2008
J5.7		Update Chart 1 on Page 2 of E-2, Tab 1, Schedule 2 to reflect actual values from January to April 2008	June 6, 2008
J5.8		Provide actual values from January to April 2008 on Table 1 of E-2, Tab 1, Schedule 2	June 6, 2008
J5.9		To provide total OM&A cost and total lost production for each outage for 2005, 2006 and 2007	June 16, 2008/addendum – June 25, 2008
J5.10		To provide forecast impact of the reactor tube shield problem at Pickering Unit 7	June 17, 2008
J6.1	June 2	To produce the AISC approval reports for OM&A and capital payments for the amounts attributed to 2008/2009 on Page 5 of Exhibit K6.1	June 20, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
6.2	June 2	To provide a breakdown of spending category of OPGS's costs for 2008 and 2009	June 6, 2008
J6.3		To break down Columns D and E from Exhibit F2, Tab 2, Schedule 1, Table 3 to show those staff associated with new nuclear initiative	June 6, 2008
J6.4	June 2	To determine if the amounts on lines 9 or 11 are proposed to be in-service in 2008 or 2009 and therefore released to go into rate base	June 6, 2008
J6.5		Add a column to page 9 for these projects where data has been given and provide the amount that is already in rate base for each project	June 19, 2008
J7.1	June 3	Supplement exhibit k7.1 with actual calculations.	June 6, 2008
J7.2		To separate segregated fund earnings with respect to Pickering and Darlington for 2008 and 2009.	June 19, 2008
J.7.3		To provide names of plants that have been dismantled their size and, if possible, the costs involved.	June 6, 2008
J8.1	June 9	Calculation of the net revenue contribution from the Bruce assets computed on a conventional GAAP basis for 2007, 2008 and 2009	June 19, 2008
J8.2	June 9	Provide Hackett Group benchmarking report	June 20, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J8.3		To provide the Hackett Group finance benchmarking report	June 20, 2008
J8.4		To provide a breakdown of the \$8.7 million 2008 consultants and purchased services budget, by specific consultant and purchased service	June 12, 2008
J8.5		To provide breakdown of how much of project cost relates to New Horizon contract	June 12, 2008
J8.6	June 9	Provide consolidated list of instances where OPG allocates hydroelectric costs between regulated and unregulated businesses by production volumes, megawatt hours and the dollar amounts associated with those	June 20, 2008
J8.7		To provide chart similar to L-1-58, Attachment 1, showing breakdown for regulated and unregulated hydroelectric by various categories showing corporate costs for regulated versus unregulated hydroelectric	July 2, 2008
J8.8		Provide information as how 400 jobs were reduced from complement in period between 2002 and 2005	June 20, 2008
J8.9		Provide Watson Wyatt survey	June 12, 2008
J8.10		To provide on OPG financial contributions to the Canadian Nuclear Association	June 13, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J8.11		To provide the remainder of the document entitled: "Nuclear public affairs program and business plan, 2008 overview" and to determine the meaning of the phrases: "strategic earned media story placement," and "continued partnerships for third-party endorsement."	June 12, 2008
J8.12		To provide strategic direction of J4.2, Attachment 3, page 4, Newspaper Ad	June 12, 2008
J8.13		To provide the total OPG regulatory budget for 2008 and 2009	June 20, 2008
J8.14		To provide a list of studies and reports done by external consultants	
J8.15		To provide a breakout of Interrogatory L-3 80 IT enhancements	June 25, 2008
J8.16		To provide material to explain the current status of justification for the \$7 million re-engineering of the OPG help desk	June 19, 2008
J8.17		To provide licence retention bonuses for 2008 and 2009	June 19, 2008
J9.1	June 10	To provide headcount numbers for 2005-2009 for regular and non-regular employees	June 25, 2008
J9.2		To provide information on how much has been excluded from rate base re three centrally-held assets.	June 25, 2008
J9.3		To provide a comparison of Corporate vs	June 25, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
		OM&A	
J9.4		To provide the reconciliation for 2008 and 2009 for the numbers that appear in Line 1 in Exhibit F, Tab 2, Schedule 1, Table 7	June 25, 2008
J9.5		To provide Methodology document	June 19, 2008
		No undertakings filed on June 12	
J11.1	June 13	To update Exhibit C2, Tab 1, Schedule 1, Page 258 to 261, Schedule 30	June 16, 2008
J11.2	June 13	Ms. McShane's Scorecard	June 16, 2008
J12.1	June 16	To calculate the revenue requirement impact of the application of what is called method 3	June 25, 2008
J12.2		Provide complete calculation of the impact on Capital Structure or ROE of the elimination of all variance and deferral accounts	July 2, 2008
J12.3		For utilities in Figure 13 of LEI Report, to identify if the utility has a fixed charge associated with the commodity, and proportion of total revenue requirement where possible	July 4, 2008
J13.1	June 17	To provide the source of the 91 percent capacity factor referred to on Page 36 of Kryzanowski-Roberts report	June 24, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J13.2		To confirm the cases in which Dr. Booth has given evidence since 2003 and that the table accurately reflects his recommendations and the awards made in those cases	June 23, 2008
J14.1	June 19	To identify those accounts where OPG thinks the clearing will be automatic, and those accounts where the OEB does have some discretion to apply principles of prudence	
J14.2		To provide copy of nuclear funds agreement	June 20, 2008
J14.3		To provide cost implication of the difference between the proposed long-term interest rate and the interest rate embedded in the generic electricity LDC Rate	
J14.4		To elaborate on the operation of the proposed Pension/OPEB deferral account, specifically whether the amounts needed in the account would be restricted solely to the impact of a change in discount rates on Pension/OPEB expense in the test period, or whether any offsetting changes in other elements of Pension/OPEB expense would be included	
J14.5		To calculate what the deferral account balance would be applying the flow-through method rather than the rate base method	
J14.6		To provide answer as to whether what is being requested in this case is analogous to hydro one transmission 2007/2008 case	

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J14.7		To break out the cost of the incremental organization from the \$271 million total cost	June 25, 2008
J15.1	June 20	To provide answer whether the difference between the totals in H1-T3-S1 of 2,325 and 2,178 for 2008 and 2009, and the K7.1 totals of 1,231 million and 878 million, is funded liability; or otherwise explain difference between those numbers	June 25, 2008
J15.2		To advise why the four material risks were chosen and to rank in order of importance	
J15.3		To provide the impacts for increases and decreases of 25, 50, 75 and 100 basis points to the pension and OPEB	
J15.4		[UNSPECIFIED]	
J15.5		To file document entitled, "Forecast Information (as of Q3 2004) for facilities prescribed under Ontario Regulation 53/05", as found on OEB website	June 23, 2008
J15.6		To provide a response to Mr. Rubin's 30-Day Scenario	July 3, 2008
J15.7		To provide the fixed versus variable costs of regulated hydroelectric	
J15.8		To provide the estimate of the percentage increase of the energy line of a bill for the typical customer	June 25, 2008

<u>Undertaking</u>	<u>Date</u>	<u>DESCRIPTION</u>	<u>Response Date</u>
J15.9		To provide calculation showing prospective recovery of retrospective amount of nuclear and hydroelectric	July 3, 2008
J15.10		To advise the accuracy of forecast of on-peak and off-peak HOEP	July 2, 2008
J15.11		To provide ONFA schedule showing OPG's required segregated fund contributions	July 3, 2008

UNDERTAKING (J) and EXHIBIT (K) LIST

K-EXHIBITS FILED AT ORAL HEARING

2008

<u>EXHIBIT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
	May 22	No Exhibits Filed on May 22, 2008
K2.1	May 23	Document Produced by Mr. Buonaguro
	May 26	No Exhibits Filed on May 26, 2008
K4.1	May 27	AMPCO cross-examination brief.
K4.2	May 27	Board Staff compendium in nuclear base O&M costs
K4.3	May 27	Chart entitled, "2007 EUCG data, OPG units and other units within 100 megawatts of Pickering."
K5.1	May 30	Document brief entitled "AMPCO cross-examination document brief, OPG panel number 5: Nuclear production forecast and outage OM&A," dated May 30th, 2008
K5.2	May 30	Energy Probe cross-examination document brief
K6.1	June 2	Document Entitled "OPG Direct Examination Documents Brief"

K-EXHIBITS FILED AT ORAL HEARING

2008

<u>EXHIBIT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
K6.2	June 2	Document Entitled "Refurbishment/New Builds Approvals Requested"
K6.3	June 2	VECC cross-examination document brief
K6.4	June 2	Project description for the site preparation, construction and operation of the Darlington B Nuclear Generating Station, environmental assessment, dated April 12, 2007
K7.1	June 3	Document entitled "Comparison of Nuclear Liability Costs".
	June 5	No Exhibits Filed on June 5, 2008
	June 6	No Exhibits Filed on June 6, 2008
K8.1	June 9	AMPCO cross-examination document brief, panel 9
K8.2	June 9	Energy Probe document brief for panel 9
K8.3	June 9	Schools summary of support and centrally held costs
	June 10	No Exhibits filed on June 10, 2008

K-EXHIBITS FILED AT ORAL HEARING

2008

<u>EXHIBIT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
K10.1	June 12	AMPCO brief of materials
K10.2	June 12	Pollution Probe cross-examination reference book
K11.1	June 13	Decision and Order of the Board in RP-2002-0158 dated January 16, 2004
K11.2		Report of the Board on Cost of Capital and 2 nd Generation Incentive Regulation for Ontario's electricity distributors, dated December 20, 2006
K11.3		Letter from CIBC World Markets to the Minister of Energy dated October 17, 2005
K11.4		Book of documents entitled "GEC, PEMBINA, OSEA cross materials"
K11.5		CME document brief
K11.6		Brief entitled "Brief re Rate Base, Capital Structure and Return Implications of Deferred Liabilities" that has a date on the front of June 2, 2008
K11.7		FERC decision dated April 9th, 2003 (excerpt)
K12.1	June 16	Document brief of Mr. Faye

K-EXHIBITS FILED AT ORAL HEARING

2008

<u>EXHIBIT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
K12.2		CV of A.J. Goulding
K12.3		Examination briefs from OPG on Cost of Capital, (2 volumes)
K12.4		Document provided to board panel
K13.1	June 17	Pollution Probe Examination-in-Chief Reference Book
K14.1	June 19	Document of previously filed material for Examination-in-Chief of Dr. Schwartz
K14.2		Brief of document produced by Mr. Rodger
K14.3		Accounting Procedures Handbook for Ontario Electric Distribution Utilities, account 1592
K15.1	June 20	OEB document EB-2006-0117 entitled, "RE: Approval of Accounting Interest Rates Methodology for Regulatory Accounts," Nov. 28th, 2006
K15.2		Document entitled, "Prescribed Interest Rates for Approved Accounts of Gas Utilities and Electricity LDCs and other rate-regulated entities approved by the Board"

K-EXHIBITS FILED AT ORAL HEARING

2008

<u>EXHIBIT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
K15.3	June 20	One-page Document entitled, "Average Annual Hourly Ontario Energy Price (HOEP)"