

CAVALLUZZO HAYES SHILTON
McINTYRE & CORNISH LLP

BARRISTERS

SOLICITORS

474 Bathurst Street
Suite 500
Toronto, Ontario M5T 2S6
Telephone: 416-964-1115
Facsimile: 416-964-5895
Email: contactus@cavalluzzo.com
Website: www.cavalluzzo.com

In Association with Patrice F. Band

Please refer to: **Jo-Anne Pickel**
Direct line: (416) 964-5537
Email: jpickel@cavalluzzo.com
Assistant: Fernanda Da Silva
Assistant's Email: fdasilva@cavalluzzo.com
File No.: 101387

July 29, 2010

VIA MAIL and RESS FILING

Ms. Kirsten Walli, Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto, ON M4P 1E4

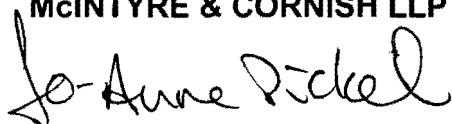
Dear Ms. Walli:

**Re: Society of Energy Professionals' Intervention Request:
EB-2010-0008 -- Ontario Power Generation -- 2011-12
Payment Amounts Application for Prescribed Generating Facilities**

Please find enclosed interrogatories filed by the Society of Energy Professionals in connection with the above-captioned proceedings.

Yours very truly,

**CAVALLUZZO HAYES SHILTON
McINTYRE & CORNISH LLP**



Jo-Anne Pickel
Encls.

cc: The Applicant
All Intervenors
Rod Sheppard, The Society of Energy Professionals
Mike Belmore, The Society of Energy Professionals

ONTARIO ENERGY BOARD

IN THE MATTER OF *the Ontario Energy Board Act, 1998*;

AND IN THE MATTER OF an Application Approving Payment Amounts for
Prescribed Generating Facilities

Interrogatories of
The Society of Energy Professionals

Issue: 6.4: Is the benchmarking methodology reasonable? Are the benchmarking results and targets flowing from those results for OPG's nuclear facilities reasonable?

Ref. Exh. F2, Tab 1, Sch. 1, p. 6

The Application indicates that the transmittal letter provided by Scott Madden with the Phase 1 Benchmarking Report noted the impact of factors influencing OPG's performance gap against best quartile. The letter stated:

In our opinion the comparisons provided in this report present a fair and balanced view of OPG operating and financial performance compared to other operators in the nuclear generation industry. However, it would be inappropriate to generalize regarding OPG's absolute performance based solely upon comparison to industry averages. Differences in design technology, the number of reactors on site, the geographic size of the site, reactor age, operational condition and other factors all influence OPG's operational and financial performance. Benchmark data can be useful for highlighting performance gaps relative to other nuclear generation operators but prescriptive conclusions regarding OPG's ability to narrow such performance gaps will require further analysis.

Questions:

1. Please provide benchmarking data that is adjusted to take into account the factors identified above which Scott Madden identified as contributing to OPG's performance gap (i.e. differences in design technology, the number of reactors on site, the geographic size of the site, reactor age, and operational conditions)

as well as the following factors: the greater regulatory/licensing requirements that must be met by OPG and the special technical expertise required to operate CANDU reactors.

2. If no such benchmarking data exists, please explain why OPG has not sought benchmarking data that would more appropriately adjust for these factors, especially as they relate to Pickering A and B.