

700 University Avenue, Toronto, Ontario M5G 1X6

Tel: 416-592-5419 Fax: 416-592-8519
barbara.reuber@opg.com

September 23, 2011

VIA COURIER AND RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON
M4P 1E4

Dear Ms. Walli:

EB-2011-0286 – Comments of OPG - Consultation on OPG's 2013-2014 Payment Amounts Application

Please find attached OPG's comments in response to the OEB's consultation regarding prioritization of issues and proposed updated filing guidelines for OPG's next payment amounts application.

Pursuant to the OEB's September 8, 2011 letter, I am providing two hardcopies and one electronic copy in searchable PDF format filed through the OEB web portal (RESS). I am also providing by e-mail an electronic copy of an Excel file for Attachment 1, which forms part of OPG's comments.

Yours truly,

[original signed by]

Barbara Reuber

Attach.

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B;

AND IN THE MATTER OF a consultation to determine the filing requirements and most efficient means to review the issues in Ontario Power Generation Inc.'s next application to the Ontario Energy Board to determine payment amounts under Section 78.1 of the *Ontario Energy Board Act, 1998*.

**COMMENTS OF ONTARIO POWER GENERATION INC. -
CONSULTATION ON OPG'S 2013-2014 PAYMENT AMOUNTS APPLICATION**

Ontario Power Generation Inc. ("OPG") submits the following comments in response to Board staff's September 8, 2011 proposed Filing Guidelines ("Proposed Guidelines") for OPG's next payment amounts application and the consultation regarding options for prioritization of issues. OPG fully supports the OEB's goal of a more efficient hearing process for its next payment amounts application, where there is a focus on the most significant issues, and submits these comments to help advance that goal. OPG's comments also seek to build on the lessons learned in the last two proceedings.

These comments are organized in two sections. The first section discusses the options for prioritization of issues. The second section addresses the draft revisions to the filing guidelines presented in the Proposed Guidelines.

A. OPTIONS FOR PRIORITIZATION OF ISSUES

OPG sees promise in the OEB's "Early Prioritization" option for promoting regulatory efficiency and ensuring that hearing time is devoted to the most significant issues. In contrast, OPG believes that adoption of the "Pre-Hearing Prioritization" option as presented would make little difference in the efficiency of the regulatory process and could in fact negatively impact the hearing process. Below OPG presents the basis for its views on the two options and provides a proposal for how Early Prioritization could work in practice and a suggestion for modifying the Pre-Hearing Prioritization option to increase its efficiency benefits.

Early Prioritization

In OPG's view, the focus of Early Prioritization should be on developing an OEB-approved list of secondary or non-priority issues to be addressed through the applicant's evidence and written argument. All other issues (i.e., those not designated as non-priority) would be heard in the normal course and would be subject to inquiry through interrogatories, a Technical Conference and cross examination.

OPG believes that Early Prioritization could be efficiently implemented as follows:

1. As an initial step, Board staff, OPG and other interested parties would meet to discuss a list of issues that should be considered for non-priority status and seek to obtain consensus on this list. Prior to the consultation, OPG would identify and distribute a preliminary list of non-priority issues based on the following criteria: a) stable costs since the last application; b) approach to cost determination consistent with that previously approved; and c) little controversy in past payment amount proceedings. As part of its materials, OPG would include information demonstrating how each of the proposed non-priority issues meets these criteria.
2. Based on the results of this consultation, a list of non-priority issues would be proposed to the OEB.
3. Where there was disagreement as to whether an issue should be on the non-priority list, the parties could make submissions to the OEB.
4. The OEB would establish the approved list of non-priority issues.
5. OPG would file its evidence including evidence sufficient to support its proposed resolution of the non-priority issues.
6. If, based on OPG's evidence, a party believed that an issue should be removed from the non-priority list, the party could file a motion to that effect with the OEB.
7. Issues on the approved non-priority issues list would not be subject to interrogatories, questions at Technical Conference or cross examination at the hearing. They would be addressed, to the extent necessary, through final argument.

The following are examples of issues from the EB-2010-0008 Issues List that could be considered for inclusion on the non-priority issues list:

1. *What is the appropriate capital structure and rate of return on equity?*

This assumes OPG applies the OEB formula for return on equity and the capital structure from EB-2010-0008 and EB-2007-0905.

2. *Are OPG's proposed costs for its long-term and short-term debt components of its capital structure appropriate?*

This assumes OPG follows approved methodologies from EB-2010-0008.

3. *Is the test period Operations, Maintenance and Administration budget for the regulated hydroelectric facilities appropriate?*

4. *Are the "Centralized Support and Administrative Costs" (which include Corporate Support and Administrative Service Groups, Centrally Held Costs and Hydroelectric Common Services) and the allocation of the same to the regulated hydroelectric business and nuclear business appropriate?*

5. *Are the amounts proposed to be included in the test period revenue requirement for other operating cost items, including depreciation expense, income and property taxes, appropriate?*

OPG would file the required depreciation study. Assuming depreciation expense is consistent with the results of the study, depreciation would not be reviewed further in the hearing.

Pre-Hearing Prioritization

In contrast to Early Prioritization, OPG sees less benefit in Pre-Hearing Prioritization as presented because it occurs so late in the process and is unlikely to produce meaningful changes in the normal course of how hearings unfold. Furthermore, it could introduce inefficiency by requiring the same witness panels to appear multiple times. As contemplated in the OEB's letter, Pre-Hearing Prioritization would not occur until after OPG's evidence had been filed, and interrogatories and any technical and settlement conferences had concluded. This timing would compel OPG, Board staff and intervenors to treat all issues as "priority" in all stages of the proceeding prior to the hearing itself. Thus, this approach would yield no savings in pre-hearing preparation – the volume of evidence, interrogatories and technical conference questions would be unchanged.

If the Pre-hearing Prioritization option were modified to have the hearing panel designate non-priority issues for written hearing at the conclusion of the interrogatory process, some savings could be achieved in subsequent phases of the proceeding including the technical and settlement conferences. Parties would have seen OPG's evidence and had an opportunity to ask interrogatories prior to issue prioritization being undertaken by the OEB.

In any event, the practical impact of Pre-Hearing Prioritization on the length of the hearing is likely to be small. As matters currently stand, if after reviewing the evidence parties do not wish to challenge OPG's position on an issue, they simply refrain from asking questions about that issue and no hearing time is spent on it. This is the same result as would occur under Pre-Hearing Prioritization if the OEB ultimately were to designate an issue as being for a written hearing (i.e., argument) only.

The alternative suggestion of moving issues designated as non-priority to the end of the hearing is unworkable. OPG presents witness panels comprised of individuals who are knowledgeable about particular areas of the company's operations and who often hold very senior roles within the company. To the extent that there were non-priority issues to be heard at the end of the hearing, the relevant witness panels would need to be recalled to address them. Having the same witness panels appear once for the priority issues and again days later for the non-priority issues is inefficient. Moreover, it would make little sense to increase the significant time commitment to the OEB process that senior employees already make by having them appear again to address issues of secondary importance. The time spent on recalling panels and having multiple rounds of cross examination would compound the inefficiency.

In addition, OPG believes that the ordering of the panels should reflect a logical presentation of the costs necessary to generate electricity from OPG's prescribed facilities. This is the best way to clearly explain the costs that drive the revenue requirement and ultimately lead to the determination of payment amounts and riders. In this presentation order, each subject area is likely to have both priority and non-priority issues because each panel is organized around a different component of OPG's revenue requirement. Any attempt to abandon this logical structure and instead structure

the hearing around the relative priority of the issues is likely to produce a disjointed presentation of OPG's costs as well as the inefficiency identified above.

OPG believes that by focusing the entire proceeding on those issues where real differences are likely to emerge, regulatory efficiency can be improved. This can best be accomplished by using Early Prioritization at the beginning of the proceeding to establish a list of non-priority issues that can be resolved based on written evidence and argument.

B. PROPOSED FILING GUIDELINES

Page references throughout this document are based on the "track changes" version of the Proposed Guidelines and section numbers correspond to those in the Proposed Guidelines.

General

Section 2.1 of the Introduction of the Proposed Guidelines states "OPG should strategically consider the clarity and *materiality* of the evidence, with the goal of providing a clear and concise narrative of its filing". This is consistent with EB-2010-0008 Decision with Reasons which identified the need to focus on priority issues identified for the next application. However, the Proposed Guidelines seek to expand the filing requirements in a number of places. In OPG's view, this is not consistent with the OEB's direction. The larger the volume of requested information, the more difficult it is to present a concise narrative that allows everyone to focus on the priority issues. The proposed expansion of the filing requirements will make an already lengthy and complex application more challenging to prepare and review. In the comments below, OPG identifies the requirements in the Proposed Guidelines that appear too detailed for areas that are not priority issues.

As a regulated entity in Ontario, OPG is unique in terms of its regulatory framework, assets, and cost drivers. The filing guidelines for OPG should seek the information necessary to enable the OEB to make a determination of just and reasonable payment amounts for the prescribed facilities. Often this will require different information and a differing level of detail than that required for other entities regulated by the OEB. In

finalizing the Proposed Guidelines, the OEB should consider whether the information sought for inclusion is of the type and at the level of granularity necessary for the effective regulation of OPG.

2.1 Introduction

Presentation of Comparable Information

The Proposed Guidelines state “The Board expects OPG to present data on a consistent basis so that comparisons are accurate.” (page 5). Where changes have occurred in organizational structure, accounting, etc., presentation of data on a consistent basis may require some modification of historical information from that filed in EB-2010-0008. Where there has been a change, OPG will attempt to present information on a basis most consistent with the test period. In some cases, this may require assumptions and estimations to be made for historical years. An example of this is nuclear information for Pickering operations. In the previous applications OPG reported certain information for Pickering A and Pickering B nuclear stations separately. With the organizational amalgamation of Pickering A and B in 2011, OPG will have a single Pickering station for the test period. Historical information will be presented differently from the previous application to reflect this amalgamation.

Appendices

The Proposed Guidelines state “The various appendices referred to in the filing guidelines are available in Excel format on the Board’s website and shall be completed and filed as part of the application” (page 6). The most efficient and effective approach would be to allow OPG to prepare the appendices consistent with information from its own systems, while meeting the intent of the required appendix. As an example, OPG has prepared information in Excel format for employee cost data, which is attached in draft (refer to **Attachment 1**).

Revenue Requirement Work Form

The Proposed Guidelines state that “A revenue requirement workform (“RRWF”) has been developed for OPG. Appendix A is similar to the RRWF developed for distribution rate cases. A completed RRWF shall be filed with the application in Excel format” (page 6). OPG understands that creation of a tool for OPG similar to the existing RRWF template for distribution companies would be of assistance to the OEB. There are many

distinctions between OPG and distribution companies that make it inappropriate to use the RRWF for distribution companies as a starting point for such a tool. These distinctions include a single revenue requirement for a single year for distributors, while OPG's rate application includes two years of information and the determination of two revenue requirements for OPG, regulated hydroelectric and nuclear. Also, the content of the revenue requirement, capitalization and revenue breakdowns are specific to OPG's revenue sources, capital structure, working capital derivation and customers.

OPG does not object to filing an Excel tool that uses the elements of its revenue requirement as data inputs and produces the resulting tables from its payment amounts order. OPG proposes that it develop such an OPG-specific Excel tool and file it in the proceeding. The advantages of this approach are:

- a) Leverage existing tools – OPG's payment order establishes the OEB-approved revenue requirement and payment amounts, the size of the payment amount increase and the estimated impact on customers as a result of the OEB's Decision. OPG can leverage its existing tool for production of the payment amounts order to prepare spreadsheets similar to the RRWF but appropriate for OPG. Many of the payment amounts calculations for OPG are complex and significantly different from those for distributors, e.g., revenue requirement impacts of nuclear liabilities, debt allocations between nuclear and regulated hydroelectric, and tax calculations. By leveraging its existing tools OPG can most efficiently meet the OEB's intent for the RRWF.
- b) Transparent and understandable – The payment amount order format is transparent and understandable. OPG has used the related tables for the two previous payment orders.
- c) Unique to OPG – The content of the revenue requirement, capitalization, working capital and revenue breakdowns are specific to OPG. Payment amount riders are separately identified. The customer impact and rate impact schedules reflect considerations relevant to OPG rather than distribution utilities.

OPG expects that a considerable amount of effort will be required to create an "OPG RRWF" workbook, but expects that the resulting tool will be useful to the OEB and intervenors. Once the OEB indicates its acceptance of this approach, OPG would

proceed to develop this tool with the expectation that it could be provided before the interrogatory phase of the hearing process.

2.1.1 Key Planning Parameters

CGAAP and IFRS Reporting

The Proposed Guidelines state “OPG should refer to the Report of the Board: Transition to IFRS, dated July 28, 2009 (“Board Report”), and subsequent amendments and addendum for guidance on IFRS. While this Board Report was directed to electricity and gas distributors, the Board will consider OPG’s transition to IFRS in the context of the policies established in the Board report.” (page 7). As the OEB recognizes, this Report applies specifically to distributors and therefore, OPG is outside of the scope for the report. OPG is mindful of the guidance from the report and will apply it where appropriate.

The Proposed Guidelines also state “As OPG is expected to adopt modified [International Financial Reporting Standards] (IFRS) for financial reporting in 2012, OPG is required to present all historical years up to 2010 on a [Canadian Generally Accepted Accounting Principles] (CGAAP) basis, historical year 2011 on both CGAAP and modified IFRS basis, bridge year 2012 and test years 2013 and 2014 on a modified IFRS basis.” (page 7). OPG will provide 2011 on a CGAAP and modified IFRS basis. For OPG, many items will be the same whether presented on an IFRS or a CGAAP basis. Rather than providing a large amount of redundant information, OPG will highlight the items for which there are differences.

2.2.2 Overview/Summary

Status of OEB Directives

The Proposed Guidelines require “Summary and status of Board directives from any previous Board Decisions and/or Orders. OPG should clearly indicate how these have been or are being addressed in the current application” (page 9). This requirement should be limited to directives from the last OEB decision (i.e., EB-2010-0008) and the decision from the subsequent motion (EB-2011-0090). OPG has already addressed directives from earlier decisions in prior filings.

2.2.3 Background Financial Information

Business Plan Period

The Proposed Guidelines require “2012 – 2016 Business Plan for OPG, for the hydroelectric business, and for the nuclear business...” (page 10). The business plan period should be amended to 2012 to 2014, to reflect a change in OPG’s business planning process implemented during 2011. OPG has moved to a three-year business plan horizon based on a review of industry best practices. In addition, the term “regulated” should be included, i.e., the statement would become “2012 – 2014 Business Plan for *regulated* components of OPG...”

Audited Prescribed Generation Facilities Financial Statements

Audited financial statements for OPG’s prescribed generation facilities will not be available for 2010. The OEB’s Decision EB-2010-0008, specifying the ongoing requirement for these reports was not issued until March 10, 2011, after OPG’s auditors had completed their work for 2010, and year-end 2010 prescribed facility audited financial statements were not prepared. The statements for 2011 will include the 2010 comparatives so that audited information for 2010 will be available.

2.3 EXHIBIT B RATE BASE

Nuclear Rate Base

The Proposed Guidelines state, “A description of the prescribed generation facilities, and of any financial assets, shall be provided. For nuclear rate base, a separate presentation of asset retirement costs (“ARC”) associated with decommissioning liability (i.e. asset retirement obligation (“ARO”) under CGAAP) is required” (page 10). It is more appropriate to replace “decommissioning liability” with “nuclear liability obligations” since decommissioning is only one component of OPG’s nuclear liability obligations.

OPG will provide the information as required by the Board’s decision EB-2010-0008 which states “...it would be beneficial and would improve transparency for regulatory purposes if gross plant and accumulated depreciation for ARC were separately identified in the rate base evidence” (page 59). The information in parenthesis “(i.e., asset retirement obligation (“ARO”) under CGAAP) is required),” however, is unnecessary and confusing. Information provided will be consistent with OPG’s overall financial statement presentation requirements.

2.4.1 Capital Structure – Amounts & Ratios

The Proposed Guidelines state, “A historic accounting of changes to OPG’s capital structure from 2009 to the date of filing should be provided, including asset valuations, write downs, debt issues and asset retirements” (page 12). Like other utilities, OPG applies a deemed capital structure to its rate base. It is the rate base continuity schedules that contain write downs, impairments, retirements and asset valuations. These schedules are required in the rate base section of the application. This requirement, therefore, should be removed from the Capital Structure section as it is addressed as part of the rate base presentation.

2.4.3 Calculation of Return of Equity

The Proposed Guidelines for proposed return on equity require “the filing of supporting documentation” (page 12). To the extent that there is supporting documentation (e.g., Global Insight reports), OPG will provide it.

2.4.4 Nuclear Waste Management and Decommissioning Costs

The Proposed Guidelines include the additional requirement that “Any updates or revisions to the Ontario Nuclear Funds Agreement (“ONFA”) must be summarized and the financial impacts explained in detail, including a reconciliation with the Board approved amounts for 2011 and 2012” (page 12). OPG understands that this requirement intends to refer to the ONFA *Reference Plan* and not the agreement itself. Under the requirements of O. Reg. 53/05 section 6(2) paragraph 8, the OEB is required to ensure that OPG recovers the revenue requirement impact arising from the current approved reference plan. The ONFA Reference Plan is approved by the Government of Ontario. OPG proposes to provide an overview of the updated ONFA Reference Plan, highlighting the major changes and providing details on how these changes impact the revenue requirement. OPG submits that a detailed explanation of the changes in the reference plan will add unnecessary volume and complexity to the application.

There are no changes to 2011 as a result of the changes to the ONFA Reference Plan. The reconciliation between OEB-approved amounts for 2012 and the new amounts resulting from changes to the ONFA Reference Plan will be provided in the nuclear

liabilities variance account. The requirement in this section (page 13) with respect to nuclear liabilities, therefore, appears unnecessary and should be removed.

2.5 EXHIBIT D CAPITAL PROJECTS

OPG supports the increase in the threshold for providing Business Cases and submits that it should be further raised to \$25 million consistent with a focus on the priority issues. OPG's procedures around capital projects, which take authority from OPG's Organizational Authority Register, require that business cases prepared for capital projects \$25 million and greater be approved by OPG's Board of Directors. This is an indication that these projects are significant in the context of a company of OPG's size and complexity. Specifically, based on information from EB-2010-0008, a \$20 million threshold would require business cases for 13 capital projects at a total value of approximately \$2,140 million, and a \$25 million threshold would require business cases for 10 capital projects at a total value of approximately \$2,070 million (the total value includes \$1,600 million for the Niagara Tunnel Project in both cases). For OM&A projects, a \$20 million threshold would require eight business cases at a total value of approximately \$280 million and a \$25 million threshold would require four business cases at a total value of approximately \$190 million. The business cases represent a large volume of material and were found in the last proceeding to include confidential information. Review of the business cases for OPG's larger projects would be more focused and efficient with the adoption of a higher \$25 million threshold.

The Proposed Guidelines state "OPG shall provide a summary table for projects \$5M and greater ... The table should include the project stage at the time of the EB-2010-0008 application and the current status of the project" (page 14). The phrase "*at the time of the EB-2010-0008 application...*" is ambiguous. OPG proposes changing this sentence to: "The table should include the project stage *as provided in* the EB-2010-0008 application and the current status of the project."

2.7.1 Operating, Maintenance & Administrative and Other Costs

Employee Benefit Programs

Comments are provided for individual bullets included in the Proposed Guidelines (page 17).

- i. *“- actuarial evidence to support pension and OPEB expense for the bridge year and test years including any educational notes or articles issued by the Canadian Institute of Actuaries (“CICA”) on methods for determining discount rates used for reporting under CICA standards.”*

The first reference in parenthesis to the acronym “CICA” should be corrected to “CIA”. OPG may require specific permission to file certain information that is not publicly available.

- ii. *“- a table that summarizes actual accounting expense compared to Board approved test year expense and with amounts actually paid for pensions and OPEBs for the period April 1, 2008 to the end of the test period.”*

Given OPG’s application will include historic years 2009 to 2011, it is unclear why information is requested for a portion of 2008. Also, the references to “test year” and “test period” should be revised to “historical years” and “historical period” since actual expense data will not be available for 2013 - 2014.

Regulatory Affairs Costs

The proposal for additional information on Regulatory Affairs costs is contrary to the approach of focusing on priority issues. As stated in EB-2010-0008, “It is the Board’s conclusion that a number of issues which parties pursued vigorously in cross-examination and argument were not of sufficiently high priority in terms of the dollars or the principle involved.” OPG considers the Regulatory Affairs costs to be one such issue and, therefore, propose this requirement be removed. OPG’s position is supported by the Decision of the OEB in EB-2007-0905 (page 62) which states with respect to OPG’s regulatory affairs budget: “In the context of OPG’s overall situation, these costs are not material.”

2.7.2 Taxes

The Proposed Guidelines state, “The documentation shall include the tax returns and notices of assessment, re-assessment and statements of adjustments” (page 18). OPG submits that this requirement should be removed. This requirement will require OPG to

file a large volume of confidential information; OPG provided this information for the prior application and few references were made to it in the hearing or in arguments.

The complexity of the returns and the fact that they are prepared for corporate OPG rather than the regulated entity, make it very difficult to reconcile information in the returns with the regulatory tax calculation. OPG's evidence provides a thorough presentation of the derivation of regulatory income tax using a methodology that was accepted by the OEB in the last hearing.

In addition, these proposed requirements go beyond those for other entities regulated by the OEB. The Filing Requirements for Gas Distributors (EB-2005-0494, Minimum Filing Requirements for Natural Gas Distribution Cost of Service Applications, November 30, 2005) do not include tax returns or notices of assessment, re-assessment and statement of adjustment. The filing requirements for transmitters and distributors include only the most recent tax return (Ontario Energy Board, Chapter 2 of the Filing Requirements for Transmission and Distribution Applications, June 22, 2011) and not returns for all historic years or notices of assessment, re-assessment and statements of adjustments. There is no reason to require OPG to file documentation beyond that which is required of other entities on an issue that was contested and fully resolved in the prior hearing.

DRAFT

Compensation and Benefits

Line No.		2009 Actual	2010 Actual	2011 Actual	2012 Budget	2013 Plan	2014 Plan
		(a)	(b)	(c)	(d)	(e)	(f)
1	Number of Regular Staff ¹	FTEs	FTEs	FTEs	FTEs	FTEs	FTEs
1a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
1b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
1c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
2	Number of Non-Regular Staff ²	FTEs	FTEs	FTEs	FTEs	FTEs	FTEs
2a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
2b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
2c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
3	Base Salary & Wages (Regular Staff) ³	\$M	\$M	\$M	\$M	\$M	\$M
3a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
3b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
3c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
4	Base Salary & Wages (Non-Regular Staff) ⁴	\$M	\$M	\$M	\$M	\$M	\$M
4a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-

Line No.		2009 Actual	2010 Actual	2011 Actual	2012 Budget	2013 Plan	2014 Plan
		(a)	(b)	(c)	(d)	(e)	(f)
4b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
4c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
5	Total Base Salary & Wages (Regular and Non-Regular Staff)	\$M	\$M	\$M	\$M	\$M	\$M
5a	Nuclear						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
5b	Regulated Hydroelectric						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
5c	Allocated Corporate Support						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
6	Overtime (Regular and Non-Regular Staff) ⁵	\$M	\$M	\$M	\$M	\$M	\$M
6a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
6b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
6c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
7	Incentive Pay (Regular Staff) ⁶	\$M	\$M	\$M	\$M	\$M	\$M
7a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
7b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
7c	Allocated Corporate Support						
	Management						
	Society						

Line No.		2009 Actual	2010 Actual	2011 Actual	2012 Budget	2013 Plan	2014 Plan
		(a)	(b)	(c)	(d)	(e)	(f)
	PWU						
	Subtotal	-	-	-	-	-	-
8	Non-Statutory Benefits⁷	\$M	\$M	\$M	\$M	\$M	\$M
8a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
8b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
8c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
9	Pension & OPEB⁸	\$M	\$M	\$M	\$M	\$M	\$M
9a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
9b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
9c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal	-	-	-	-	-	-
10	Total Benefits (Non-Statutory Benefits and Pension and OPEB)	\$M	\$M	\$M	\$M	\$M	\$M
10a	Nuclear						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
10b	Regulated Hydroelectric						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
10c	Allocated Corporate Support						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
11	Total Compensation (Base Salary & Wages, Overtime, Incentive Pay and Total Benefits)	\$M	\$M	\$M	\$M	\$M	\$M
11a	Nuclear						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-

Line No.		2009 Actual	2010 Actual	2011 Actual	2012 Budget	2013 Plan	2014 Plan
		(a)	(b)	(c)	(d)	(e)	(f)
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
11b	Regulated Hydroelectric						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
11c	Allocated Corporate Support						
	Management	-	-	-	-	-	-
	Society	-	-	-	-	-	-
	PWU	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
12	Compensation - Average Yearly Base Salary & Wages for Regular and Non-Regular Staff (FTEs)	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE
12a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal						
12b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal						
12c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal						
13	Compensation - Average Yearly Overtime for Regular and Non-Regular Staff (FTEs)	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE
13a	Nuclear						
	Management						
	Society						
	PWU						
	Subtotal						
13b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal						
13c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal						
14	Compensation - Average Yearly Incentive Pay for Regular Staff (FTEs)	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE	\$K / FTE
14a	Nuclear						
	Management						
	Society						
	PWU						

Line No.		2009 Actual	2010 Actual	2011 Actual	2012 Budget	2013 Plan	2014 Plan
		(a)	(b)	(c)	(d)	(e)	(f)
	Subtotal						
14b	Regulated Hydroelectric						
	Management						
	Society						
	PWU						
	Subtotal						
14c	Allocated Corporate Support						
	Management						
	Society						
	PWU						
	Subtotal						
15	Total Compensation Charged to OM&A and Capitalized	\$M	\$M	\$M	\$M	\$M	\$M
	Total Compensation	-	-	-	-	-	-
	Total Compensation Charged to OM&A						
	Total Compensation Capitalized						

Notes

- Regular Staff (FTEs)** - occupies a position that is considered part of the ongoing organization of OPG. Includes regular hours only, excludes overtime.
- Non-Regular Staff (FTEs)** - hired for short-term work assignment which is not ongoing (i.e. normally 12 months or less and not extending beyond 24 months. Includes regular hours only; excludes overtime.
- Base Salary & Wages (Regular Staff)** - includes base pay and statutory benefits (CPP, EI, Employer Health Tax and WSIB assessment) of all regular staff. Includes authorization bonuses and leadership allowances for Nuclear employees who are authorized by the Canadian Nuclear Safety Commission ("CNSC") and Nuclear staff Outage Bonus. Excludes overtime.
- Base Salary & Wages (Non-Regular Staff)** - includes base pay and statutory benefits (CPP, EI, Employer Health Tax and WSIB assessment) of all non-regular staff. Excludes overtime.
- Overtime** - includes overtime pay and statutory benefits associated with overtime pay for regular and non-regular staff.
- Incentive Pay** - includes goalsharing for unionized staff, Award for Performance ("AFP") for Society-represented employees (suspended in 2011), Management Group Annual Incentive Plan ("AIP"). Excludes authorization bonuses and leadership allowances for Nuclear employees who are authorized by the Canadian Nuclear Safety Commission ("CNSC") and Nuclear staff Outage Bonus, which are part of Base Salary & Wages.
- Non-Statutory Benefits** - includes Employee Family Assistance Program ("EFAP"), maternity supplement and costs during employment of group life insurance, dental plan and extended health benefits. This is applicable to Regular Staff.
- Pension and OPEB** - includes current service cost component of total pension and OPEB costs. Current service cost is the only component of pension and OPEB costs that relates to current staff. Current service cost represents the cost of the pension and OPEB benefits deemed to be accrued by current staff in the year. This is applicable only to Regular Staff.