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April 1, 2008

BY EMAIL & BY COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Ms. Walli:

Board File No. EB-2007-0905
Payment Amounts for Ontario Power Generation Inc.'s Prescribed Facilities
Energy Probe Interrogatories Set # 4

Attached please find two hard copies of Set # 4 of the Interrogatories of Energy Probe Research Foundation (Energy Probe) in response to Procedural Order No. 2, issued March 20, 2008. An electronic version of this communication will be forwarded in PDF and Word formats.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc. Barbara Reuber, Ontario Power Generation Inc. (By email)
Michael A. Penny, Torys LLP (By email)
Josephina D. Erzetic, Ontario Power Generation Inc. (By email)
Peter T. Faye, Energy Probe Counsel (By email)
Interested Parties (By email)

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Ontario Energy Board

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

AND IN THE MATTER OF an Application by Ontario
Power Generation Inc. pursuant to section 78.1 of the *Ontario
Energy Board Act, 1998* for an Order or Orders determining
payment amounts for the output of certain of its generating
facilities.

**INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

SET NUMBER 4

April 1, 2008

**ONTARIO POWER GENERATION INC.
DETERMINING PAYMENT AMOUNTS
EB-2007-0905**

**ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES – SET NUMBER 4**

Interrogatory # 38

Ref: Exh. D1/T 1/S 1, p. 3

Issue 3.3: If the costs and financial commitments are not within project budgets approved by the board of directors of OPG, are the costs and financial commitments prudent?

How will the delays in the construction of the Niagara Tunnel Project affect load forecasting in OPA's IPSP report going forward?

Interrogatory # 39

Ref: Exh. D1/T 1/S 1, pp. 3-4

Issue 3.6: Will OPG's accounting policies result in capitalization of an appropriate amount of costs incurred in 2008 and 2009 with respect to the construction or acquisition of capital assets?

- a) Does OPG have any information intelligence, planned strategic scenarios, or other actionable methodologies to identify additional, future delays by the contractor for the Niagara Tunnel Project?
- b) Did OPG anticipate NTP delays identified since 2006?
- c) What plans does OPG have to anticipate further delays for the NTP?
- d) How quickly (e.g. hours, days, weeks, months?) is OPG informed by the contractors when delays begin to occur or have occurred in the NTP?

Interrogatory # 40

Ref: Exh. A1/T 4/S 2, p. 17

Issue 4.1: Is the methodology used by OPG to generate the proposed hydroelectric and nuclear business production forecasts appropriate?

Please explain why “the two largest plants, Sir Adam Beck II and Saunders ... [were] in the upper two quartiles for ... availability and EFOR from 2003-2006.

Interrogatory # 41

Ref: Exh. A1/T 4/S 2, p. 11

Issue 5.1: Are the Operational, Maintenance and Administration (“OM&A”) budgets for the prescribed hydroelectric and nuclear business appropriate?

Please identify all external reports received by OPG on the Environment Performance Index from 2000 to the present.

Interrogatory # 42

Ref: Exh. A1/T 4/S 1, p. 15

Issue 5.1: Are the Operational, Maintenance and Administration (“OM&A”) budgets for the prescribed hydroelectric and nuclear business appropriate?

Please identify all external benchmarking reports commissioned by OPG since its inception.

Interrogatory # 43

Ref: Exh. A1/T 4/S 2, p. 19

Issue 5.1: Are the Operational, Maintenance and Administration (“OM&A”) budgets for the prescribed hydroelectric and nuclear business appropriate?

Did the Haddon Jackson Associates report examine the matter of labour performance productivity? If so, in what manner was labour performance productivity treated? If labour performance productivity was not examined, why not?