

**Ontario Energy
Board**
P.O. Box 2319
27th. Floor
2300 Yonge Street
Toronto ON M4P 1E4
Telephone: 416- 481-1967
Facsimile: 416- 440-7656
Toll free: 1-888-632-6273

**Commission de l'énergie
de l'Ontario**
C.P. 2319
27e étage
2300, rue Yonge
Toronto ON M4P 1E4
Téléphone: 416- 481-1967
Télécopieur: 416- 440-7656
Numéro sans frais: 1-888-632-6273



BY E-MAIL

October 25, 2013

Colin Anderson
Director, Ontario Regulatory Affairs
Ontario Power Generation Inc.
700 University Avenue, H18G2
Toronto ON M5G 1X6

Dear Mr. Anderson:

**Re: Ontario Power Generation Inc.
2014-2015 Payment Amounts Application
Board File Number EB-2013-0321**

The Board has completed a preliminary review of Ontario Power Generation Inc.'s ("OPG") application for payment amounts for the prescribed generation facilities filed on September 27, 2013. The "Filing Guidelines for Ontario Power Generation Inc. in Setting Payment Amounts for Prescribed Generation Facilities" issued on November 11, 2011 served as the reference document for the review.

The preliminary review has identified that certain sections of the evidence supporting the application do not comply with the filing guidelines. Those sections include:

Filing Guideline (EB-2011-0286)	Application (EB-2013-0321)
Page 6 - <i>"Excel spreadsheets shall be provided as appropriate to the data in question. Generally, formulae indicating on-sheet calculations shall be provided. As a minimum, OPG shall file an Excel spreadsheet summarizing production forecast (as noted in section 2.6), compensation and benefits (as noted in section 2.7.1) and a Revenue Requirement Work Form ("RRWF") in Excel format."</i>	Only the RRWF has been filed in Excel format.

Filing Guideline (EB-2011-0286)	Application (EB-2013-0321)
Page 8 – <i>“Unless otherwise directed by the Board, any request for confidential treatment of information by OPG must be made at the time of the filing and in accordance with the Board’s Practice Direction on Confidential Filings.”</i>	OPG requests confidential treatment for two volumes of information. The information has not been filed in accordance with section 5.1.4(b) of the Practice Direction which states that a request for confidentiality must include, “a confidential, un-redacted version of the document containing all of the information for which confidentiality is requested. This version of the document should be marked “confidential” and should identify all portions of document for which confidentiality is claimed by using shading, square brackets or other appropriate markings. If confidential treatment is requested in relation to the entire document, the document should be printed on coloured paper”
Page 9 – <i>“Audited prescribed generation facilities financial statements for the Historic Years”</i>	Exh A2-1-1, page 3 – <i>“OPG is preparing a set of stand-alone annual consolidated financial statements for the prescribed facilities in accordance with USGAAP for the year ended December 31, 2012, with comparative information for the year ended December 31, 2011. At the time of filing, the audit of these financial statements has not been completed. After the audit has been completed, these financial statements will be filed as Attachment 2 to this exhibit.”</i>
Page 17 – <i>“A variance analysis for OM&A, and components of OM&A (including Regulatory Affairs costs), shall be provided”</i>	No Regulatory Affairs costs or analysis have been provided.
Page 21 – <i>“OPG shall provide a description of the settlement process with the IESO, including a description of the timelines associated with the requested effective date.”</i>	No description has been provided.

The Board expects that OPG will file the above listed information as soon as possible. In addition, the Board notes:

- At Exh A2-1-1 page 1, OPG has provided links to financial information on its webpage. To facilitate reference during this proceeding to financial documents listed in the filing guidelines that were not filed with the application but are available on

OPG's webpage, please file one hard copy with the Board and file electronic copies with the Board of each document. Please assign an exhibit number to each of the documents.

- At Exh F4-1-1 page 1, OPG notes that it has filed a 2011 Depreciation Study. OPG also states that it is in the process of updating the study based on changes made to end of life dates for Pickering and to include the Niagara Tunnel. OPG states that the updated study will be filed as it becomes available.
- There is no index provided with the two volumes of information for which confidential treatment is sought. In addition, there are no tabs provided in Attachment A. Please provide an index and tabs with the confidential information that is filed in accordance with section 5.1.4(b) of the Practice Direction.
- At Exh A1-4-3 page 1, OPG states that the operations of Pickering A and Pickering B were amalgamated into a single station in 2010. At page 5 of the filing guidelines, the Board commented that analysis in the previous proceeding was complicated when data was presented in ways that were not comparable. The Board encourages OPG to file any additional information, when it files information that is the subject of this correspondence, that could assist parties with their review of Pickering operations as it is presented in the current application and the previous application. In the absence of information presented as Pickering A and Pickering B, subject areas that could receive many interrogatories are nuclear production forecast and nuclear benchmarking.

Today, the Board has issued a letter of direction and notice of application. The timing of any further procedural steps will be dependent on OPG's response to the items noted in this correspondence. Specifically, the Board does not intend to proceed with further procedural steps beyond notice until such time as the updated Depreciation Study (Exh F4-1-1, Exh F5-3-1) and audited financial statements for the prescribed generation facilities for the historic years (Exh A2-1-1) are filed with the Board.

Please direct any questions relating to this application to Violet Binette, Project Advisor at 416-440-7674 or violet.binette@ontarioenergyboard.ca.

Yours truly,

Original signed by

Kirsten Walli
Board Secretary

CC: Charles Keizer, Torys LLP
Carlton Mathias, OPG