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Feb. 28, 2014

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

Dear Ms. Walli,

RE: EB-2013-0321 - LPMA Interrogatories

Please find attached the interrogatories of the London Property Management Association ("LPMA") in the above noted application.

Sincerely,

Randy Aiken

Randy Aiken
Aiken & Associates

Encl.

cc: Colin Anderson, OPG (by e-mail)
Carlton Mathias, OPG (by e-mail)
Charles Keizer, Torys (by e-mail)

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
LONDON PROPERTY MANAGEMENT ASSOCIATION
("LPMA")**

February 28, 2014

2. RATE BASE

2.1 Are the amounts proposed for rate base appropriate?

2.1-LPMA-1

Ref: Exhibit B1, Tab 1, Schedule 1

Please update Chart 1 to reflect actual data for 2013. If actual data for all of 2013 is not yet available, please update the 2013 figures to reflect the most recent year-to-date actuals available for 2013, along with an estimate of the in-service additions for the remainder of the year.

2.1-LPMA-2

Ref: Exhibit B1, Tab 1, Schedule 1

Please update Tables 1 and 2 to reflect actual data for 2013. If actual data for all of 2013 is not yet available, please update the 2013 figures to reflect the most recent year-to-date actuals available for 2013, along with an estimate for the remainder of the year.

3. CAPITAL STRUCTURE AND COST OF CAPITAL

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

3.2-LPMA-3

Ref: Exhibit C1, Tab 1, Schedule 2

Please update Tables 5, 6 and 7 to reflect actual borrowings in 2013 Issue 29, Niagara 25 and Niagara 26 and any other actual borrowings that were in place at the end of 2013.

3.2-LPMA-4

Ref: Exhibit C1, Tab 1, Schedule 2

Please update Tables 6a and 7a to reflect the most recent Global Insight forecast available and the most recent estimate available for the OPG Spread.

5. PRODUCTION FORECASTS

Regulated Hydroelectric

5.1 Is the proposed regulated hydroelectric production forecast appropriate?

5.1-LPMA-5

Ref: Exhibit E1, Tab 1, Schedule 1

Please update Table 1 to reflect actual production in 2013.

Nuclear

5.5 Is the proposed nuclear production forecast appropriate?

5.5-LPMA-6

Ref: Exhibit E2, Tab 1, Schedule 1

Please update Charts 1 & 2 to reflect actual production figures for 2013.

6. OPERATING COSTS

Regulated Hydroelectric

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

6.1-LPMA-7

Ref: Exhibit F1, Tab 1, Schedule 1

a) Please update Chart 2c to reflect actual data for 2013.

b) Please updates Tables 1 and 2 to reflect actual data for 2013.

6.1-LPMA-8

Ref: Exhibit F1, Tab 2, Schedule 1

Please update Table 4 to reflect actual FTE's for 2013.

6.1-LPMA-9

Ref: Exhibit F1, Tab 2, Schedule 1

- a) Please provide the average annual percentage increase in the labour cost (including overtime) per FTE associated with the Base OM&A in each of 2010 through 2015, including 2013 actuals.
- b) Please provide the associated dollar impact on the Base OM&A associated with the percentage per FTE requested in part (a) above for each of 2010 through 2015.
- c) Please provide a table that shows for each of 2010 through 2015 (including actual 2013) the total labour related costs (shown in Table 1), the total staff FTE's (shown in Table 4) and the resulting labour cost per FTE. Please confirm that the total labour related costs shown in Table 1 include overtime.

6.1-LPMA-10

Ref: Exhibit F1, Tab 3, Schedule 1

- a) Please provide the average annual percentage increase in the labour cost (including overtime) per FTE associated with the Project OM&A costs in each of 2010 through 2015, including 2013 actuals.
- b) Please provide the associated dollar impact on the Project OM&A associated with the percentage per FTE requested in part (a) above for each of 2010 through 2015.
- c) Please add a line to Table 1 that shows the total OM&A labour (including overtime) for Project Work broken out as a separate line item, similar to what has been done for Table 1 in Exhibit F1, Tab 2, Schedule 1.
- d) Please provide a table that shows for each of 2010 through 2015 (including actual 2013) the total labour related costs (requested in part (c) above), the total staff FTE's associated with Project OM&A and the resulting labour cost per FTE.

6.1-LPMA-11

Ref: Exhibit F1, Tab 4, Schedule 1

- a) Has OPG proposed a variance account related to the potential deduction allowed under Ontario Regulation 124/02 for eligible capacity of new, redeveloped, or upgraded stations if a decision from the Ministry of Natural Resources is received before the end of the test periods? If not, why not?
- b) Has OPG estimated the potential deduction that might be available for the test periods? If so, please provide the amounts.
- c) Would it be possible that a decision from the Ministry of Natural Resources, even if not received before the end of the test periods, could be applied retroactively to when OPG files the application?

d) What is the status of the OPG application to the Ministry of Natural Resources for the GRC deduction pertaining to production increases at the Sir Adam Beck plants as a result of the new Niagara tunnel that commenced operation in March 2013?

Nuclear

6.3 Is the test period Operations, Maintenance and Administration budget for the nuclear facilities appropriate?

6.3-LPMA-12

Ref: Exhibit F2 Tab 1, Schedule 1

Please update Tables 1, 2 and 3 to reflect actual FTEs for 2013.

6.3-LPMA-13

Ref: Exhibit F2, Tab 1, Schedule 1

a) Please provide the average annual percentage increase in the labour cost per FTE associated with the Nuclear OM&A costs in each of 2010 through 2015, including 2013 actuals.

b) Please provide the associated dollar impact on the Nuclear OM&A (including overtime) associated with the percentage per FTE requested in part (a) above for each of 2010 through 2015.

c) Please add a line to Table 1 that shows the labour related component (including overtime) of the total OM&A shown on line 11.

d) Please provide a table that shows for each of 2010 through 2015 (including actual 2013) the total labour related costs (requested in part (c) above), the total staff FTE's associated with Nuclear OM&A (shown in Table 3) and the resulting labour cost per FTE.

Corporate Costs

6.8 Are the 2014 and 2015 human resource related costs (wages, salaries, benefits, incentive payments, FTEs and pension costs) appropriate?

6.8-LPMA-14

Ref: Exhibit F4, Tab 3, Schedule 1

a) Please update Attachment 6 to reflect actual data for 2013.

b) Please explain any significant differences between the forecast the actuals for 2013.

7. OTHER REVENUES

Regulated Hydroelectric

7.1 Are the proposed test period revenues from ancillary services, segregated mode of operation and water transactions appropriate?

7.1-LPMA-15

Ref: Exhibit G1, Tab 1, Schedule 1

Please update Table 1 to reflect actual data for 2013.

Nuclear

7.2 Are the forecasts of nuclear business non-energy revenues appropriate?

7.2-LPMA-16

Ref: Exhibit G2, Tab 1, Schedule 1

Please update Table 1 to reflect actual data for 2013.

Bruce Nuclear Generating Station

7.3 Are the test period costs related to the Bruce Nuclear Generating Station, and costs and revenues related to the Bruce lease appropriate?

7.3-LPMA-17

Ref: Exhibit G2, Tab 2, Schedule 1

Please update Tables 1 through 6 and Tables 8 and 9 to reflect actual data for 2013.