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October 3, 2016

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

To Ms. Walli,

**Re: EB-2016-0152 – Ontario Power Generation Inc. – Payment Amounts for the
Period 2017-2021**

Below Please find Lake Ontario Waterkeeper's interrogatories for the abovementioned matter. These submissions have been emailed to all parties to this hearing in addition to the Board Secretary and OEB staff. Two paper copies have also been mailed to the Board.

Should you have any questions or concerns, please do not hesitate to contact me at the coordinates above.

Sincerely,

A handwritten signature in dark ink, appearing to read 'P. Feinstein', with a stylized circular flourish at the beginning.

Pippa Feinstein, JD
Counsel for Lake Ontario Waterkeeper

Before the 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.

Lake Ontario Waterkeeper Interrogatories for Ontario Power Generation

Issue 6.4 Is the test period Operations, Maintenance and Administrative budget for the Darlington Refurbishment Program Appropriate?

Reference: Ex. D2-02-01 of the OPG application

1. In the last OPG Rates application in 2013-2014, Waterkeeper obtained the following expected costs for Darlington Nuclear Generating Station's Environmental Assessment Follow-up programs during the last test period:

	Environmental Follow-up Program Study Element:	Estimated Budget (2014)	Estimated Budget (2015)
EA Item 1	Surface Water Study (Liquid Effluents) – this had been started during the test period and was expected to continue during Darlington's refurbishment construction period and the facility's continued operation	\$60K	\$30K
EA Item 2	Surface Water Study (Stormwater) – this was not scheduled to begin during the test period	0	0
EA Item 3	Aquatic Habitat/Biota Study (Cooling Water)	\$60K	\$10K
EA Item 4A	Aquatic Habitat Study (Impingement and Entrainment), Part A: Entrainment monitoring with larger sample size and invertebrate component – scheduled prior to refurbishment outage	\$150K	\$150K
EA Item 4B	Aquatic Habitat Study (Impingement and Entrainment) Part B: Benthic invertebrate community study – scheduled prior to refurbishment outage.	\$100K	\$100K
EA Item 4C	Aquatic Habitat Study (Impingement and Entrainment) Part C: Impingement and entrainment – two years of monitoring following restart of all reactors.	0	0

Actual Costs are provided for the EA Follow-up Studies in Exhibit 2, Tab2, Schedule 1, Attachment 5 of OPG's current rates application. They are as follows:

EA Follow-up Studies	Actual Costs (2013)	Actual Costs (2014)	Actual Costs (2015)	
Effluent Characterization	0	\$5K	\$7K	This study corresponds to EA Item 1 in the chart above
Entrainment Study	0	\$25K	\$198K	This study corresponds to EA Item 4A in the chart above
Benthic Invertebrate Community Study	0	\$25K	0	This study corresponds to EA Item 4A in the chart above
Thermal Monitoring	0	\$20K	0	This study corresponds to EA Item 3 in the chart above
Stormwater Control Study	0	0	0	This study corresponds to EA Item 2 in the chart above

Please confirm that the following understanding is correct. Or if necessary, please correct any misunderstandings.

- Can you explain or provide rationale (in broad terms) for the differences in budgeted and actual spending amounts on the EA follow-up studies?

It appears as though only \$12K of a budgeted \$90K was spent on the effluent characterization study, \$223K of a budgeted \$300K was spent on the entrainment study, \$25K of a budgeted \$200K was spent on the benthic invertebrate study, and \$20K of a budgeted \$70K was spent on thermal monitoring.

- Are unused amounts that had been budgeted for these studies kept aside to be used in future years as the studies progress?
- Are there any budgeted amounts for EA follow-up studies to be undertaken between 2016 and 2021? If so, please provide rough estimates.