



November 14, 2016

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

Re: EB-2016-0152 Ontario Power Generation – 2017 to 2021 Payment Amounts Application  
AMPCO Submission on Prioritization of Issues List

Dear Ms. Walli:

AMPCO makes the following submissions regarding prioritization of the Issues List. AMPCO has reviewed the submissions of other parties in making these submissions. Where Board Staff and OPG both agree that an issue is primary and be considered at the oral hearing, AMPCO is in agreement.

#### **GENERAL**

##### **1.1 Has OPG responded appropriately to all relevant OEB directions from previous proceedings?**

AMPCO agrees this issue is secondary and a written hearing is appropriate, unless as SEC points out, it needs to be considered in relation to a Primary issue.

#### **CAPITAL STRUCTURE AND COST OF CAPITAL**

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

AMPCO agrees this issue is secondary and a written hearing is appropriate.

##### **6.3 Is the forecast of nuclear fuel costs appropriate?**

AMPCO does not agree at this point that this issue should be secondary. AMPCO has questions regarding OPG's uranium cost forecast that it wishes to explore.

##### **6.11 Are the asset service fee amounts charged to the nuclear businesses appropriate?**

AMPCO agrees this issue is secondary and a written hearing is appropriate.

#### **OTHER REVENUES**

##### **7.1 Are the forecasts of nuclear business non-energy revenues appropriate?**

AMPCO agrees this issue is secondary and a written hearing is appropriate.

#### **NUCLEAR WASTE MANAGEMENT AND DECOMMISSIONING LIABILITIES**

**Association of Major Power Consumers in Ontario**

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**8.1 Is the revenue requirement methodology for recovering nuclear liabilities in relation to nuclear waste management and decommissioning costs appropriate? If not, what alternative methodology should be considered?**

AMPCO agrees this issue is secondary and a written hearing is appropriate.

#### **DEFERRAL AND VARIANCE ACCOUNTS**

**9.1 Is the nature or type of costs recorded in the deferral and variance accounts appropriate?**

**9.2 Are the methodologies for recording costs in the deferral and variance accounts appropriate?**

AMPCO agrees with SEC's submissions that a significant component of the revenue requirement for OPG flows through deferral and variance accounts and those material accounting entries should be tested in a public hearing.

**9.3 Are the balances for recovery in each of the deferral and variance accounts appropriate?**

**9.4 Are the proposed disposition amounts appropriate?**

**9.6 Is the proposed continuation of deferral and variance accounts appropriate?**

AMPCO agrees these issues are secondary but agrees with Board Staff's submission that revenue requirement examination of a primary issue with a related deferral and variance account would, by association, allow examination of the account by way of oral hearing.

**9.8 Should any newly proposed deferral and variance accounts be approved by the OEB?**

AMPCO submits this issue should be primary given that the potential need for new deferral and variance accounts is not yet known.

#### **REPORTING AND RECORD KEEPING REQUIREMENTS**

**10.1 Are the proposed reporting and record keeping requirements appropriate?**

AMPCO agrees with SEC's submissions that the extent to which the Board maintains ongoing transparency between OPG and the regulator during a period of massive change at OPG is an issue in this proceeding and submits the issue should be primary and considered at an oral hearing.

**10.4 Is the proposed reporting for the Darlington Refurbishment Program appropriate?**

AMPCO submits this issue should be primary and explored at an oral hearing given the magnitude of the program and the public's interest in this program.

#### **METHODOLOGIES FOR SETTING PAYMENT AMOUNTS**

**11.5 Is OPG's proposed mid-term review appropriate?**

AMPCO submits this issue should be primary to ensure all potential issues for mid-term review are considered.

**11.7 Is OPG's proposed off-ramp appropriate?**



AMPCO submits this issue should be primary and explored at an oral hearing given the magnitude of the Darlington Refurbishment Program and the implications of the program.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

*(ORIGINAL SIGNED BY)*

Colin Anderson  
President  
Association of Major Power Consumers in Ontario

Copy to: OPG