

1 **UNDERTAKING J13.4**

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3 **Undertaking**

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5 To clarify the issue of the 1300 FTE difference between Goodnight benchmark and
6 OPG's actual as-filed numbers.

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10 **Response**

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12 As shown in Ex. L-6.2-1 Staff-109 Chart 1, in addition to the 2,036 FTEs not
13 benchmarked by Goodnight (Ex. F2-1-1, p.14), there were 1,310.4 FTEs included in
14 OPG's 2014 actual FTEs (Ex. F4-3-1 Attachment 1) that were excluded from Goodnight
15 benchmarking. The 1,310.4 FTEs consisted of indirect corporate staff (545.4 FTEs) plus
16 non- regular staff not benchmarked, security staff and other (e.g., timing differences)
17 (combined 765.0 FTEs). These types of exclusions are consistent with previous
18 Goodnight benchmarking studies.

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20 Indirect corporate staff (e.g., treasury, tax, etc.) were incorrectly shown on p. 14 of the
21 Goodnight report (Ex. F2-1-1) under the heading Other Exclusions. However, these
22 FTEs are not reflected in the 2,036 FTEs because they are not dedicated to the nuclear
23 business. The 2,036 FTEs represent dedicated regular staff nuclear personnel, which
24 Goodnight assessed and ultimately determined could not be benchmarked.

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26 Security staff was also incorrectly shown as included in Other Exclusions. These FTEs
27 were also not reflected in the 2,036 FTEs because Goodnight never assessed them for
28 inclusion or exclusion from benchmarking. As stated in JX17.9, OPG is not permitted to
29 release security protected prescribed information pursuant to Sections 21 (1)(c) and
30 23(1) of the General Nuclear Safety and Control Regulations under the *Nuclear Safety*
31 *and Control Act*. Non Regular staff not benchmarked are also excluded from the 2,036
32 FTEs, as the 2,036 FTEs represent regular staff only.

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34 As a result, total non-benchmarked FTEs would include the 2,036 nuclear personnel
35 FTEs, the 545 indirect corporate staff FTEs and the 765.0 FTEs associated with non-
36 regular staff not benchmarked, security staff and other (timing differences).
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1 **UNDERTAKING J13.5**

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3 **Undertaking**

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5 To provide any written communication (received in 2017) from the CNSC regarding the
6 status of the CNSC drug testing initiative and requirements.
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10 **Response**

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12 OPG has received two written communications from the CNSC in 2017 regarding the
13 status of the CNSC drug testing initiative and requirements. The two emails are
14 attached as Attachments 1 and 2.
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-----Original Message-----

Robin:

There will be a formal announcement on Monday, but it's not going to the Commission in March. The new date is still to be determined.

I have cc'd Maury as he had asked the same question last week.

Brian

-----Original Message-----

Good afternoon.

I am checking on the status of this Regulatory Document, which I understand is expected to be presented to the Commission at the March 8/9 Meeting.

Can you please confirm, when will this document be sent out? We will need to review it prior to the Commission Meeting.

Thank you.

Robin Manley
OPG

Hello,

Thank you for your ongoing interest in REGDOC-2.2.4 *Fitness for Duty*. Please be advised the REGDOC presentation to the Commission has been postponed and will not go forward in March 2017. The new date is still to be determined and an email will be sent informing you of the new date once details are finalised.

Thanks for your continued interest in this document. If you have any questions please contact [Jason Churchill](#).

Regards,

Brian Torrie

Director General, Regulatory Policy Directorate / Regulatory Affairs Branch
Canadian Nuclear Safety Commission / Government of Canada
brian.torrie@canada.ca / Tel: 613-947-3728

Directeur général, Direction de la politique de réglementation / Direction générale des
affaires réglementaires
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
brian.torrie@canada.ca / Tél: 613-947-3728

Please note that my new email address is brian.torrie@canada.ca.
A noter que ma nouvelle adresse courriel est brian.torrie@canada.ca

UNDERTAKING J13.8

Undertaking

Reference: K13.2, page 22

To provide nuclear rates on yearly basis as provided to the IESO. Explain how rates were calculated and how incremental and non-incremental costs were factored in on best efforts basis.

Response

The “unsmoothed” nuclear rates that OPG provided to the IESO in 2015 are shown in Chart 1 below (constant 2015\$).

Chart 1

| \$/MWh | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|---|------|------|------|------|------|------|------|------|------|
| Base Case (Pickering to 2020) | 69 | 86 | 83 | 82 | 82 | 182 | 169 | 213 | 128 |
| Pickering Extended Operations (62 TWh scenario) | 69 | 89 | 81 | 84 | 93 | 98 | 100 | 112 | 88 |

The nuclear rates shown in Chart 1 were calculated in a manner consistent with how proposed nuclear payment amounts are calculated and reflect total costs and production associated with both Pickering and Darlington based on the information provided to the IESO in 2015. The total costs include incremental costs associated with Pickering Extended Operations as well as all other non-incremental costs that factor into OPG’s nuclear payment amounts. The classification of incremental and non-incremental costs associated with Pickering Extended Operations is not a relevant consideration for establishing the nuclear rates shown in Chart 1.

The IESO described how the rates in Chart 1 were factored into their analysis at Tr. Vol. 12, p. 16.