## **UNDERTAKING J20.10**

### 3 Undertaking

(A) To update Chart 1 on page 1 of the AMPCO Compendium (Ex. K20.4); (B) To update the chart on page 2 of the AMPCO Compendium (Ex. K20.4).

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## 9 Response

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The requested charts are provided in Attachment 1, Table 1 and Table 2. As clarified 11 through the exchange at Tr. Vol. 20, p. 121, line 5 to p. 122, line 5 preceding this 12 13 undertaking, these charts reflect the actual 2016 in-service additions and the forecast 14 2017-2021 annual in-service additions and depreciation expense per the pre-filed 15 evidence, all of which have been adjusted for the removal of the Heavy Water Storage 16 and Drum Handling Facility Project ("D2O Project") in-service additions. Table 2 also reflects the actual year-end 2016 asset retirement cost adjustment, a reduction of 17 18 \$258.3M, resulting from the 2017 ONFA Reference Plan update, and associated 2017-19 2021 annual depreciation expense impacts.<sup>1</sup>

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21 OPG does not believe that the selective update provided by this undertaking would 22 provide a reasonable basis on which to establish the nuclear rate base values for the 23 2017-2021 period (Tr. Vol. 21, p.4, line 24 to p. 6, line 16). The information requested in 24 the undertaking shows the effect of a variance between forecast and actual 2016 in-25 service amounts without considering changes in the forecast in-service amounts over the full period to 2021, including those due to projects that were planned to come into 26 27 service in 2016 moving into 2017. For example, Ex. J14.1 notes that, for Nuclear 28 Operations capital, \$70.3M that was planned for 2016 was placed in service in Q1 2017. As well, as part of the Darlington Refurbishment Program ("DRP"), the Containment 29 Filtered Venting System Project has been placed in service in 2017 and the Third 30 31 Emergency Power Generator Project will be placed in service shortly. These two 32 projects were originally planned to come in service in 2016 at a projected total of 33 approximately \$200M.<sup>2</sup>

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35 As discussed in Ex. J21.1, OPG continues to propose that the pre-filed rate base values be approved in this application, subject to the removal of the D2O Project per Ex. N2-1-36 37

1 and the inclusion of the year-end 2016 asset retirement cost adjustment arising from

<sup>&</sup>lt;sup>1</sup> This asset retirement cost adjustment underpins the 2017-2021 nuclear liabilities' revenue requirement impact for the prescribed facilities detailed in Ex. J21.2. The amount of this adjustment differs from \$237.9M shown at Ex. N1-1-1, Table 3, col. (a), line 22 (and detailed at Ex. N1-1-1, Table 5) because Ex. N1-1-1 reflected projected impacts of the 2017 ONFA Reference Plan update, which were determined prior to the end of 2016 for the purposes of the 2017-2019 Business Plan.

Ratepayers are kept whole for any change in DRP in-service amounts through the Capacity Refurbishment Variance Account.

the 2017 ONFA Reference Plan update. Ex. J21.1 also provides OPG's current bestefforts view of 2017-2021 nuclear net plant rate base values, including both year-end 2016 actual results and a more recent outlook for Nuclear Operations and Support Services in-service capital over the IR Term. As discussed in Ex. J21.1, this current

5 view demonstrates that the pre-filed rate base values remain reasonable.

 Table 1

 Forecast Nuclear In-Service Capital Additions

 (Updated Ex. B1-1-1 Chart 1 for 2016 Actuals and Removal of D2O Project In-Service Additions)

	Reference for 2017- 2021	Actual 2016	2017	2018	2019	2020	2021
Nuclear Operations capital projects <sup>1</sup>	Ex. D2-1-3 Table 4, line 17 & 26	292.0	389.0	315.2	239.3	300.4	215.6
Darlington Refurbishment Program	Ex. N2-1-1 Table 3, line 12 & 17	164.4	8.5	8.9	0.0	4,809.2	0.4
Support Services capital projects entering rate base	Nuclear Portion of Ex. D3-1-2 Table 5, lines 7, 9, 13 & 15	8.9	8.1	18.0	5.0	5.0	5.0
Total nuclear in-service additions, excluding ARC	Ex. B3-3-1 Tables 1 & 2, col. (b)	465.3	405.6	342.1	244.3	5,114.7	221.1

<sup>1</sup> Actual 2016 as shown in Ex. J14.1, Att. 1, Table 1, col. (e), line 17.

# Table 2 Prescribed Facility Rate Base - Nuclear (\$M) (Updated Ex. B3-1-1 Table 1 for 2016 Actuals and Removal of 2016-2021 D2O Project In-Service Additions) Years Ending December 31, 2013 to 2021

			2013 Actual 2014 Actual				2015 Actual			
Line No.	Prescribed Facility	Gross Plant at Cost	Less: Accumulated Depreciation and Amortization	AccumulatedGrossAccumulatedDepreciation andNetPlantDepreciation andNet		Gross Plant at Cost	Less: Accumulated Depreciation and Amortization	Net Plant		
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
1	Darlington NGS	801.9	294.8	507.1	870.5	326.9	543.6	939.1	359.6	579.5
2	Darlington Refurbishment Program	61.3	1.1	60.2	125.9	4.7	121.2	203.1	10.5	192.6
3	Pickering NGS	2,008.1	1,145.8	862.3	2,094.3	1,279.0	815.3	2,170.9	1,422.5	748.4
4	Nuclear Support Divisions <sup>1</sup>	332.1	228.1	104.1	354.2	255.6	98.5	369.3	282.6	86.8
5	Nuclear - Excluding Asset Retirement Costs	3,203.5	1,669.9	1,533.6	3,444.8	1,866.2	1,578.7	3,682.5	2,075.1	1,607.4
6	Asset Retirement Costs	2,839.2	1,369.0	1,470.2	2,839.2	1,449.7	1,389.4	2,839.2	1,530.5	1,308.7
7	Total	6,042.7	3,038.9	3,003.8	6,284.0	3,315.9	2,968.1	6,521.7	3,605.6	2,916.1

			2016 Actual 2017 Plan					2018 Plan			
Line No.	Prescribed Facility	Less:Less:Less:GrossAccumulatedGrossAccumulatedPlantDepreciation andNetPlantDepreciation andNetat CostAmortizationPlantat CostAmortizationPlant		Gross Plant at Cost	Less: Accumulated Depreciation and Amortization	Net Plant					
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	
8	Darlington NGS	1,152.4	394.9	757.5	1,383.7	436.6	947.1	1,647.0	484.4	1,162.6	
9	Darlington Refurbishment Program	377.0	22.2	354.7	463.4	40.0	423.5	472.1	59.0	413.1	
10	Pickering NGS	2,235.2	1,570.7	664.5	2,311.8	1,745.6	566.2	2,397.9	1,957.1	440.8	
11	Nuclear Support Divisions <sup>1</sup>	384.0	307.2	76.7	399.5	332.0	67.5	415.2	357.3	57.9	
12	Nuclear - Excluding Asset Retirement Costs	4,148.6	2,295.1	1,853.5	4,558.4	2,554.1	2,004.3	4,932.2	2,857.9	2,074.3	
13	Asset Retirement Costs <sup>2</sup>	2,421.7	1,596.0	825.7	2,163.3	1,658.2	505.1	2,163.3	1,732.3	431.0	
14	Total	6,570.2	3,891.1	2,679.2	6,721.7	4,212.3	2,509.4	7,095.6	4,590.2	2,505.3	

			2019 Plan	019 Plan 2020 Plan				2021 Plan		
			Less:		Less:				Less:	
		Gross	Accumulated		Gross	Accumulated		Gross	Accumulated	
Line		Plant	Depreciation and	Net	Plant	Depreciation and	Net	Plant	Depreciation and	Net
No.	Prescribed Facility	at Cost	Amortization	Plant	at Cost	Amortization	Plant	at Cost	Amortization	Plant
		(a)	(b)	(C)	(d)	(e)	(f)	(g)	(h)	(i)
15	Darlington NGS	1,887.0	538.5	1,348.5	2,142.6	598.3	1,544.3	2,361.2	664.2	1,697.0
16	Darlington Refurbishment Program	476.6	78.3	398.3	4,672.8	162.2	4,510.6	5,286.0	319.9	4,966.1
17	Pickering NGS	2,434.6	2,182.1	252.5	2,442.1	2,412.0	30.1	2,474.7	2,555.2	(80.6)
18	Nuclear Support Divisions <sup>1</sup>	427.3	379.4	47.9	439.0	399.3	39.8	451.0	418.8	32.2
19	Nuclear - Excluding Asset Retirement Costs	5,225.5	3,178.3	2,047.2	9,696.6	3,571.7	6,124.9	10,572.8	3,958.1	6,614.7
20	Asset Retirement Costs <sup>2</sup>	2,163.3	1,806.5	356.8	2,163.3	1,880.6	282.7	2,163.3	1,921.5	241.8
21	Total	7,388.8	4,984.8	2,404.0	11,859.9	5,452.4	6,407.6	12,736.1	5,879.6	6,856.5

Notes:

 Includes support divisions within nuclear accountable for providing specialized services (e.g. Nuclear Engineering, Inspection and Maintenance Services).
 Starting in 2017, updated to reflect the change in asset retirement costs \$(258.3M) recorded on December 31, 2016 as a result of the 2017 ONFA Reference Plan update, and associated annual depreciation expense impacts.

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# **UNDERTAKING J20.14**

3	<b>Undertaking</b>	

- Whether any material Nuclear in-service amounts moved from 2017 to 2018.
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## 12 **Response** 13

14 OPG's current best-efforts view of Nuclear Operations in-service additions over 2017-2021 (Ex J21.1, Attachment 2, Table 2) shows the 2017 and 2018 Nuclear Operations 15

in-service amounts increasing by approximately \$90M and \$40M, respectively, when

16 compared to the pre-filed evidence. However, there is no single material in-service 17

18 amount that is forecast to move between 2017 and 2018.