NUCLEAR RATE-SETTING FRAMEWORK AND PERFORMANCE REPORTING

1.0 OVERVIEW

OPG proposes payment amounts for the nuclear facilities for the period from January 1, 2022 to December 31, 2026 (the "IR term") based on the same Custom Incentive Rate-setting ("Custom IR") framework that the OEB approved in EB-2016-0152.[1] Section 2.0 of this schedule provides detailed information on the nuclear Custom IR proposal.

OPG proposes that payment amounts for the nuclear facilities continue to be set using the Custom IR framework approved by the OEB in the EB-2016-0152 Decision, with limited adjustments to the stretch factor calculation to reflect the planned end of commercial operations at the Pickering Nuclear Generating Station ("Pickering") during the IR term, and the current performance of the facilities as reported in the 2020 Nuclear Benchmarking Report.[2] The proposed Custom IR framework will continue to rely on cost benchmark performance to determine a stretch factor to drive continuous improvement beyond the significant OM&A reduction targets embedded in the company's business plan.[3]

OPG proposes three adjustments to the nuclear stretch factor to account for the closure of Pickering during the term of this application. Specifically, OPG proposes that the stretch factor (i) be calculated based on the individual cost performance of the two nuclear facilities, (ii) be determined using the normalized nuclear cost benchmarking approach developed by ScottMadden Management Consultants ("ScottMadden"), and (iii) for 2026, be based solely on the performance of the Darlington Nuclear Generating Station ("Darlington").

---

[1] EB-2016-0152, Decision and Order, p. 136 ("EB-2016-0152 Decision").
[2] As described in detail below, the 2020 Nuclear Benchmarking Report includes a normalized calculation of TGC/MWh as developed by ScottMadden, which provides a more comparable comparison of the value for money of the benchmarked peers. The 2020 Nuclear Benchmarking Report is filed Ex. F2-1-1, Attachment 2.
[3] Ex. A2-2-1.

Chart 1 summarizes these adjustments and the rationale for each.[4] The proposed Custom IR framework also incorporates the adjustments that the OEB made to OPG's proposed Custom IR framework in EB-2016-0152.[5] Subject to these adjustments, OPG believes that the Custom IR framework remains appropriate for the nuclear facilities during the IR term.

Chart 1 – Proposed Adjustments to Nuclear Custom IR Framework

Ratemaking Element	Proposed Adjustment	Rationale
Stretch Factor Based on Individual Plant Benchmarking	The stretch factor is calculated based on the historical performance of the two nuclear generating stations, using a production-weighted average, rather than the combined "major operators."	Since Pickering is planned to cease operation during the rate-setting period, it is appropriate to calculate the stretch factor based on the discrete performance of the individual generating stations. Moreover, according to ScottMadden's 2019 Evaluation of OPG's Benchmarking Performance, ScottMadden recommended "that OPG focus on site-level comparisons of performance for Pickering and Darlington rather than operator-level comparisons" (Ex. F2-1-1, Attachment 3).
Stretch Factor Based on Normalized Benchmarking	The stretch factor is calculated using the normalized Total Generating Cost per MWh ("TGC/MWh") benchmarking approach developed by ScottMadden.	As set out in two ScottMadden studies,[6] the normalized TGC/MWh performance accounts for: (i) the costs associated with the ongoing refurbishment program at Darlington, (ii) CANDU technology, and (iii) age-related impacts The normalized performance provides a more comparable assessment of performance between peers.

[4] Relative to OEB-approved IRM and Custom IR frameworks in EB-2016-0152.
[5] Specifically, the application of the stretch factor to operations OM&A (base OM&A project OM&A, outage OM&A and allocated corporate costs), excluding Pickering Extended Operations enabling costs, and to nuclear operations and support service in-service capital additions (EB-2016-0152, Decision and Order, December 28, 2017, p. 141).
[6] Ex. F2-1-1, Section 3.2.1, Attachment 4 (*OPG Nuclear Cost Performance Benchmarking – Methodology to Adjust for Refurbishment and Validation of Implementation*) and Attachment 5 (*OPG Nuclear Cost Performance*

Ratemaking Element	Proposed Adjustment	Rationale
Darlington-only Stretch Factor in 2026 & No Pickering Outage OM&A Reductions in 2025	The stretch factor for 2026 would be based solely on Darlington's historical normalized TGC/MWh. Prior years' Pickering OM&A cost stretch reductions would not be carried forward to 2026. 2025 stretch reductions would not carry-forward prior years' Pickering Outage OM&A reductions.	In 2026, Pickering is planned to no longer be in service and there will be no Pickering OM&A costs in OPG's revenue requirement. Any incremental efficiencies realized in 2026 will be based on Darlington's productivity. Accordingly, the stretch factor should be calibrated against that station's historical efficiency and applied to costs that continue in 2026. Since there are no outages planned at Pickering in 2025, there will be no 2025 Pickering Outage OM&A expenditures in which efficiencies could be found.

OPG's proposal is informed by the OEB's Decision and Order in EB-2016-0152, the principles set out in the *Renewed Regulatory Framework for Electricity Distributors* ("RRF"),[7] the OEB's Report on *Incentive Rate-making for Ontario Power Generation's Prescribed Assets* ("IR Report"),[8] and the *Handbook for Utility Rate Applications* ("Handbook").[9]

This schedule also sets out OPG's proposal for annual performance reporting for both the prescribed hydroelectric facilities and the nuclear facilities. As directed by the EB-2016-0152 Decision, OPG has proposed a performance reporting "scorecard" that summarizes the company's performance measures, guided by the Handbook.[10] The proposed scorecard and rationale are provided in Section 3.0 below.

Benchmarking – A Study of Factors Impacting TGC/MWH Performance with Normalizing Adjustments to Facilitate Closer Comparison).

[7] *Report of the Board: Renewed Regulatory Framework for Electricity Distributors: A Performance-Based Approach*, October 18, 2012.

[8] *Report of the Board: Incentive Rate-making for Ontario Power Generation's Prescribed Generation Assets* (EB-2012-0340), March 28, 2013.

[9] *Handbook for Utility Rate Applications*, October 13, 2016. Although the Handbook is primarily directed at electricity distributors, OPG has adopted the principles set out within it where applicable to regulated electricity generation.

[10] EB-2016-0152, Decision and Order dated December 28, 2017, p.146.

2.0 NUCLEAR FACILITIES RATE-SETTING PROPOSAL

2.1 Nuclear Custom IR Proposal

OPG proposes that payment amounts for the nuclear facilities continue to be set based on the Custom IR framework approved by the OEB for 2017-2021. The framework is based on five individual annual nuclear revenue requirements over the IR term, upon which are layered incremental, benchmark-based stretch reductions. This approach is sustained year over year, creating a meaningful incentive to continuously improve performance and cost efficiency during the period.

The nuclear Custom IR framework reflects the fact that OPG is both mid-way through executing the DRP, and transforming into a single-nuclear plant operator. These events – the successful completion of the DRP and the end of commercial operations at Pickering – will dramatically affect OPG's costs, output and revenues. The OEB recognized this reality in the 2013 IR Report, which stated that:

> "the large capital expenditures and reduced production associated with the DRP and the Pickering closure <u>do not favour the implementation of a 'pure IR regime' (i.e., one based on TFP with input cost indices, Z-factors, and off-ramps) in the immediate future</u>."[11]

Accordingly, OPG does not propose to revisit the design of the nuclear Custom IR framework in this application, part way through the DRP and during the end of commercial operations at Pickering. Instead, it proposes three limited adjustments to reflect the reality of the company in the 2022-2026 period. Section 2.2 describes the proposed adjustments to the stretch factor calculation to reflect the end of commercial operations at Pickering station during the IR term, and the current performance of the facilities as reported in the 2020 Nuclear Benchmarking Report. Subject to these adjustments, the nuclear Custom IR framework remains appropriate for OPG's nuclear facilities during the period of significant change covered by this application.

[11] IR Report, p. 8 [emphasis added]. Consistent with the IR Report and the EB-2016-0152 Decision, the Custom IR framework is based on detailed cost and generation forecasts and the extensive cost-benchmarking of OPG's nuclear stations.

The Custom IR framework approved in EB-2016-0152 was based on the principles set out in the RRF and the OEB's prior guidance on incentive ratemaking. The nuclear Custom IR framework is tied to OPG's performance on TGC/MWh benchmarking that underlies the company's gap-based business planning process. The proposed Custom IR framework applies elements of incentive rate-setting – in particular, a benchmark-based stretch factor – in a manner that is compatible with OPG's business context.

Chart 2 summarizes the elements of the proposed nuclear Custom IR framework, along with major corresponding policy objectives from the Handbook, the RRF, and other sources. While the Handbook had not been issued when OPG filed the prior EB-2016-0152 rate-setting application, the OEB found that the Custom IR proposal in that proceeding generally met the standards for such applications as set out in the Handbook.[12]

Chart 2 – Summary of Nuclear Custom IR Framework

Policy Objective(s)	Source	Corresponding aspect(s) of Nuclear Custom IR Framework
Term Adopt a longer-term approach to payment amount-setting based on the parameters for a multi-year Cost of Service application and a Custom IR framework	IR Report, p. 9 OEB Letter of February 17, 2015 O. Reg. 53/05[13] Handbook, p. 25	Nuclear ratemaking proposal includes five future test years with individual forecast revenue requirements, subject to a cumulative stretch factor reduction each year beginning in the second year, 2023.
Benchmarking Include meaningful efficiency incentives derived from external benchmarking	RRF, p. 17 Handbook, p. 26	Stretch factor reduction of revenue requirement provide up-front benefits to customers. These stretch reductions are incremental to performance improvements resulting from OPG's business planning process, discussed in Ex. A2-1-1 and Ex. F2-1-1.

[12] EB-2016-0152 Decision, p. 136.
[13] O. Reg. 53/05, s. 6(2)12.

Policy Objective(s)	Source	Corresponding aspect(s) of Nuclear Custom IR Framework
Operational Effectiveness Provide tangible benefits and consequences for operating performance Encourage sustainable, year-over-year efficiency gains	IR Report, p. 9 RRF, p. 59 Handbook, p. 10	Stretch reductions persist year-over-year, incenting OPG to find further savings in each year of the application term beginning in 2023. The 100% variable rate design of OPG's payments means that failure to achieve production forecast or to manage operating costs and capital expenditures has direct financial consequences for the company, creating a meaningful incentive to continuously improve productivity.
Outcomes & Performance Measurement Be aligned with performance outcomes Performance measures should be directly linked to desired performance outcomes	RRF, pp. 3, 59 Handbook, p. 10, 26	OPG is proposing an OEB performance scorecard to provide meaningful measures of performance of the company's nuclear operations. The proposed measures reflect identified RRF performance outcomes. See Section 3.0 below. The scorecard will include all of the measures used in OPG's nuclear benchmarking. Application includes robust evidence of the company's nuclear operations and project forecasts. OPG will continue to provide performance reporting on the DRP as set out in Ex. D2-2-8.

Policy Objective(s)	Source	Corresponding aspect(s) of Nuclear Custom IR Framework
Customer Focus Robust planning, informed by customer preferences and driven by benefits to customers, with appropriate pacing and prioritization to control costs and manage risks A focus on cost effective delivery of outcomes that matter to customers	Handbook, pp. 10, 26	In addition to the ongoing refurbishment of the Darlington station, OPG's business plan focuses on prudently managing costs related to the end of commercial operations at the Pickering station and transitioning to single-nuclear plant operations, driving improvements and realignment in the company's cost structure while maintaining safety, reliability and operating performance. The company's business plan underlying this application, including the rate-smoothing proposal, was informed by a customer engagement process on the needs, priorities, and preferences of Ontario electricity consumers.[14]
Protecting Customers	RRF, p. 11 Handbook, pp. 27-28	The ROE-based off-ramp applies to the achieved return on equity for OPG's combined regulated operations.

As described above, this Custom IR framework remains appropriate for the 2022-2026 rate period, during which the costs of and production levels at OPG's nuclear facilities will continue to vary due to the ongoing DRP (Ex. D2-2-1), and the optimized shutdown of Pickering (Ex. F2-1-1).

As set out in EB-2016-0152, the nuclear Custom IR framework balances the objectives of the RRF and other policies described above with the fact that OPG's capital and operating costs will vary significantly with the refurbishment of the Darlington facility and the optimized shutdown of Pickering. The Custom IR reflects the volatility in OPG's underlying nuclear costs during this period, while still creating meaningful, benchmark-based incentives to continuously improve the company's nuclear cost performance beyond the level embedded in the business plan.

[14] Details of the customer engagement process are provided in Ex. A2-2-1.

2.2 Stretch Factor Proposal

The nuclear stretch factor will reduce OPG's revenue requirement in respect of the company's operations OM&A costs (the sum of Base, Project and Outage OM&A) and allocated corporate support OM&A costs, as well as nuclear operations and corporate support services in-service capital additions.[15] The stretch factor would not apply to costs related to:

- the DRP,
- amounts eligible to be recorded in the Capacity Refurbishment Variance Account,[16] and
- amounts eligible to be recorded in the Nuclear Development Variance Account.

As discussed in Section 2.2.1 below, OPG is proposing a 0.45% stretch factor in 2023-2025, and a stretch factor of 0.3% in 2026. The stretch reduction is cumulative, resulting in a greater reduction to the applicable portion of OPG's revenue requirement in each successive year of the IR term.

The proposed stretch reductions are in addition to efficiencies and performance improvements within the company's business planning processes, including the OM&A cost reduction targets related to the end of commercial operations at Pickering station.[17] OPG continually strives to improve the company's performance and operational efficiency where it can do so safely within operational and regulatory requirements and without affecting reliability. OPG develops initiatives to meet these goals through the gap-based nuclear business planning process described in Ex. F2-1-1. The performance initiatives incorporated in the business planning process and the corresponding performance and operational efficiency improvements are reflected in the forecast expenditures in this application.

[15] EB-2016-0152 Decision, p. 140-141.
[16] In the IR term, these include costs related to the Fuel Channel Life Extension project and the associated Fuel Channel Life Extension Ongoing costs, both of which are discrete costs that are integral to enabling Darlington operations to the scheduled refurbishment dates and Pickering operations until the optimized shutdown dates (Ex. F2-1-1).
[17] Discussed in Ex. A2-2-1, and in Ex. F2-1-1.

2.2.1 Derivation of Proposed Stretch Factor

It will be extremely challenging for OPG to find additional savings at Pickering to meet the proposed stretch reductions in the years leading up to the end of its commercial operations. OPG has not planned any material capital investments at Pickering over the IR term, so it will have no opportunity to find incremental capital savings. It also has not planned any outage OM&A costs in 2025 based on the station's outage schedule. Overall, OPG's Business Plan is already based on ambitious operating cost reductions from Pickering across the IR term. Nonetheless, OPG accepts the application of the stretch factor to Pickering-related costs until the station is taken out of service in 2025.

Given that the Pickering station is planned to fully cease commercial operations in 2025,[18] OPG proposes to calculate the stretch factor based on the two individual plants' performance, rather than the combined cost benchmarking performance of the two stations relative to multi-station nuclear operators applied in the EB-2016-0152 Decision. Accordingly, OPG proposes to base the stretch factor value on the relative cost performance of each of Pickering and Darlington to the peer group identified in the 2020 Nuclear Benchmarking Report. The individual stretch factor of each station would be weighted according to each station's average annual production over the benchmark period.

As reflected in the 2020 Nuclear Benchmarking Report, Darlington's Normalized 3-Year TGC/MWh is at median (i.e., 0.3% stretch), and Pickering's performance is equivalent to the fourth quintile (i.e., 0.45% stretch).[19] OPG used a production-weighted average to determine a combined stretch factor value of 0.45%. OPG proposes that this weighted average stretch factor be used to set nuclear payment amounts until January 1, 2026, when Pickering will no longer be in service. Chart 3 shows the derivation of OPG's proposed stretch factor based on actual nuclear production at both stations over the 2017-2019 period, which are the years reflected in the 2020 Nuclear Benchmarking Report.

---

[18] Two of the Pickering units are planned to cease commercial operations in September 2024 and December 2024, respectively. The remaining four units are planned to cease commercial operations in December 2025.
[19] The 2020 Nuclear Benchmarking Report is filed at Ex. F2-1-1, Attachment 2. The Normalized 3-Year Total Generating Cost per MWh benchmarking results can be found on p. 66 of the document.

Chart 3 – Derivation of Combined Nuclear Stretch Factor[20]

Input	Value
Average actual 2017-2019 Darlington production (TWh)[21]	19.7
Average actual 2017-2019 Pickering production (TWh)	22.0
Darlington stretch factor (based on benchmark performance)	0.30%
Pickering stretch factor (based on benchmark performance)	0.45%
Production-weighted average stretch factor	0.379%
Rounded to Closest RRF stretch factor	**0.45%**

OPG has reduced the nuclear payment amounts for applicable cost categories by the combined stretch factor of **0.45% over 2023-2025** and by the Darlington-only stretch factor of **0.3% in 2026**.

As in EB-2016-0152, the cost forecasts shown throughout the evidence reflect the full proposed revenue requirement, before stretch reductions. The stretch reduction is applied when determining the proposed payment amounts in Ex. I1-3-1.

The Normalized 3-Year TGC/MWh used to determine performance for stretch factor purposes is based on ScottMadden's independent expert methodology. This methodology allows for a more comparable assessment of performance between peers than non-normalized TGC/MWh.[22] The normalization aspects of the metric address several factors that, in ScottMadden's opinion, otherwise reduce the comparability of OPG's performance to its peers. Namely, refurbishment of the Darlington station temporarily skews the results of the

[20] Under the RRF, electricity distributors are assigned to one of five performance cohorts based on their forecast costs relative to econometrically predicted benchmark costs. Based on their determined performance cohort, distributors are assigned a stretch factor of 0%, 0.15%, 0.3%, 0.45% or 0.6%. The OEB adopted this range in applying the nuclear Custom IR Framework in EB-2016-0152.
[21] Ex. E2-1-1, Table 1.
[22] Ex. F2-1-1, Attachment 4, p. 2.

TGC/MWh metric because most of the station's costs remain fixed during refurbishment, while production necessarily declines.[23] As a result, the non-normalized TGC/MWh metric does not accurately compare the station against peer generators. Additionally, as also discussed in Section 3.2.1 of Ex. F2-1-1, there are inherent differences between the CANDU reactor technology at OPG's nuclear stations and the technology of most of the peers as well as age-related impacts that collectively reduce the comparability on the "non-normalized" metric.

To address these issues and improve comparability, OPG engaged ScottMadden to undertake two independent studies to assess the potential to account for these factors and normalize OPG's Nuclear value for money metrics. These studies are filed as Ex. F2-1-1, Attachments 4 and 5. Since the purpose of the Normalized 3-Year TGC/MWh metric is to assess the cost performance of OPG and its peers on a more comparable basis, it is the appropriate and more accurate metric on which to establish the stretch factor.

2.2.2 Proposed Stretch Reduction Amounts

Subject to the adjustments noted below, OPG has calculated annual stretch reductions such that prior years' reductions are maintained (i.e., reductions to revenue requirement made in 2023 are carried forward to subsequent years, on the presumption that the company should be incented to find additional savings each year).[24]

OPG has not carried-forward historic cost reductions in categories where the company has no planned expenditures due to planned Pickering shutdown. Specifically:

- For 2025, OPG has maintained prior years' OM&A stretch reductions except Pickering Outage OM&A. Since there are no regular outages planned at Pickering during 2025, there will be no 2025 outage expenditures in which OPG could find incremental efficiencies. Accordingly, OPG has proposed not to carry-forward historic stretch reductions for Pickering Outage OM&A in calculating stretch reductions for 2025.

[23] This impact is described in detail in Section 3.2.1 of Ex. F2-1-1.
[24] This is the approach that the OEB approved and used to set nuclear payment amounts in EB-2016-0152.

- For 2026, OPG has maintained prior reductions of Darlington-related OM&A costs only. With Pickering planned shutdown by the end of 2025, there will be no 2026 Pickering OM&A costs to which the stretch factor could apply.

Chart 4 shows the result of applying the proposed stretch factor to forecast Nuclear Operations and corporate Support Services OM&A, and the capital costs of Nuclear and corporate Support Services in-service additions. The details of these calculations can be found in Ex. I1-3-1, Table 2.

Chart 4 – Stretch Reduction Amounts ($M)

	2023	2024	2025	2026
OM&A (Base, Project, Outage, and Allocated Corporate Support OM&A)[25]	2,115.9	1,947.1	1,672.7	992.5
Nuclear Operations and Support Services In-Service Additions Revenue Requirement	2.2	77.7	121.0	175.3
Stretch Factor	0.45%	0.45%	0.45%	0.30%
Annual Stretch Reduction to Nuclear Revenue Requirement	**9.5**	**18.6**	**25.5**	**18.0**

The total reduction over the term of the application is $71.7M.

This stretch reduction is incremental to the performance improvements required to achieve OPG's Business Plan. Customers will benefit from these "up-front" budget reductions, and OPG will bear the risk of any shortfall during the IR term.

2.3 Other Elements of Custom IR

In this section, OPG briefly addresses several other elements of the proposed Custom IR framework, which are unchanged from EB-2016-0152.

2.3.1 Productivity Factor Continues to be Inapplicable

[25] Excluding Pickering Optimized Shutdown enabling costs, Fuel Channel Life Extension Project and Fuel Channel Life Extension Ongoing costs, as discussed in section 2.2.

Consistent with the OEB's approval in the EB-2016-0152 Decision, OPG is not proposing a nuclear industry productivity adjustment as part of the proposed X-factor.[26] The nature and scale of the work planned by OPG for the IR term – in particular the ongoing DRP and the optimized shutdown of the Pickering station – mean that past productivity trends would not be a reasonable indicator of predicted productivity for OPG during the IR term.

2.3.2 Off-Ramp

Each year, OPG is required to file an analysis of the actual annual regulatory return, after tax on rate base, both dollars and percentages, for the combined regulated business (i.e., both hydroelectric and nuclear). This analysis includes a comparison of the regulated business' achieved ROE against the approved ROE included in the payment amounts. OPG proposes that this reporting requirement continue to be the basis for determining if its actual ROE is outside the +/-300 basis point trigger established by the RRF for determining whether a regulatory review may be initiated.

2.3.3 Treatment of Unforeseen Events

OPG proposes that unforeseen events affecting the nuclear business continue to be addressed through an accounting order process, subject to the $10M regulatory materiality threshold that has historically applied to OPG and which was accepted for this purpose in the EB-2016-0152 Decision.[27] The approach is consistent with the accounting order application requirements currently in place for accounting changes impacting the calculation of OPG's nuclear liabilities and changes in depreciation end-of-life dates for the prescribed nuclear facilities.[28] OPG's most recent accounting order application pursuant to these requirements was filed, and approved by the OEB, in EB-2018-0002.

3.0 PERFORMANCE SCORECARD

OPG currently reports to the OEB on a suite of performance metrics, as approved in the EB-2016-0152 Decision.[29] The OEB also directed OPG to file a proposal for a detailed scorecard

[26] EB-2016-0152 Decision, p. 138.
[27] Ibid, pp. 134, 142.
[28] EB-2016-0152 Payment Amounts Order, p. 13.
[29] EB-2016-0152 Decision, pp. 148-52.

in this application, guided by the Handbook. Accordingly, OPG proposes to report its performance on the OEB-approved measures through a scorecard of the format in Attachment 1, beginning in 2022. The attached scorecard form covers a five-year historic period from 2015-2019. The scorecard also includes targets for the most recent historic year and the current year (in this case, 2019 and 2020, respectively). Along with the scorecard, OPG will also file a Management Discussion and Analysis that would discuss the performance of the prescribed hydroelectric facilities on each measure, provided as Attachment 2 for the performance. OPG will file nuclear benchmark reporting annually, once available, that will discuss the facilities' performance on each metric.[30] Consistent with the reporting schedule determined by the OEB in EB-2016-0152,[31] OPG will file preliminary nuclear scorecard metrics by April 30th each year. OPG will file final metrics and benchmark quartile results by November 30th each year.

The proposed scorecard incorporates the current OEB-approved hydroelectric and nuclear performance reporting measures. The scorecard performance measures are consistent with the Operational Effectiveness outcomes contemplated in the RRF, including measures of reliability, cost performance, safety, and environmental performance. These measures reflect outcomes that are both meaningful to customers and important inputs to the company's regular business planning processes.

These metrics continue to be the appropriate measures of OPG's performance relative to the applicable RRF outcomes. OPG also proposes to continue to include in the scorecard the company's Normalized TGC/MWh for the nuclear facilities. As described in the preceding section, this metric provides the most accurate, comparable view of the value-for-money provided by the nuclear stations. For completeness, OPG also proposes to continue reporting on the non-normalized TGC/MWh.

The scorecard aligns the actual performance for each measure with the basis on which the performance target is set. Unless otherwise noted on the scorecard, targets and actual

[30] The current version of OPG's nuclear benchmark reporting is filed as Ex. F2-1-1, Attachment 1.
[31] EB-2016-0152 Decision, p. 151.

performance are reported on a single-year basis. For example, since the Nuclear Performance Index ("NPI") targets are calculated using a two-year rolling average for Pickering and a three-year rolling average for Darlington, the scorecard presents the actual performance for NPI for the same periods.

OPG proposes to continue filing separate performance results for the two nuclear stations. In addition, OPG will provide combined nuclear performance results for Unit Capability Factor, Nuclear Performance Index, and TGC/MWh. OPG will provide TGC/MWh results on both a normalized and a non-normalized basis.[32]

OPG also reports on the progress of the DRP and files financial and operating reports. The DRP reporting was approved by the OEB in the EB-2016-0152 Decision and annual reports have been filed consistently since. The financial and operating reports have been filed consistently since the OEB's Decision in EB-2010-0008.[33] The DRP reporting is extensive and tailored specifically to the details of the mega-program, and the financial and operating reports are available later in the year than the hydroelectric and nuclear performance measures.[34] Accordingly, OPG proposes to continue the past practice of reporting the DRP performance and financial and operating reports separately from the hydroelectric and nuclear performance scorecards.

[32] EB-2016-0152 Decision, p. 151.
[33] EB-2010-0008, Decision with Reasons, March 10, 2011, p. 150. The ongoing DRP reporting proposed for the 2022-26 period is discussed in Ex. D2-2-8.
[34] The financial and operating reports are filed with the OEB by July 31, whereas the hydroelectric and nuclear reports are filed by April 30th and November 30th respectively. The DRP reporting is issued in December.

ATTACHMENTS

Attachment 1: 2020 Performance Scorecard

Attachment 2: 2020 Performance Scorecard Hydroelectric Facilities MD&A