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January 26, 2021

Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON
M4P 1E4

Dear Ms. Long,

**RE: EB-2020-0290 Ontario Power Generation Inc. - 2022-2026 Payment Amounts
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in the EB-2020-0290 proceeding, the application by the Ontario Power Generation Inc. to the Ontario Energy Board for the approval its 2022 to 2026 payment amounts.

Statement of Interest

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It will be representing its many individual residential customer supporters. Energy Probe argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. It promotes sustainable resource use through individual responsibility and accountability. More information about Energy Probe can be found on the OEB website.

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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The interest of Energy Probe in this proceeding is the impact on ratepayers, including its supporters, of the OEB approvals requested by Ontario Power Generation. In that regard Energy Probe has a direct interest on the following parts of the application:

- Nuclear rate base, including test period D2O project in service additions,
- nuclear capital expenditures, including the Darlington Refurbishment Program,
- Operations, Maintenance and Administration budget for Nuclear facilities,
- Nuclear benchmarking methodology, results, and targets,
- Human resources costs, including compensation, benefits, incentives and overtime for Nuclear facilities,
- Staffing levels for Nuclear facilities, including the numbers of permanent and contract employees,
- Centrally held costs, corporate cost allocation and affiliate transactions with Nuclear facilities,
- capital structure and rate of return on equity,
- costs for the long-term and short-term debt,
- economic and business planning assumptions that impact Nuclear facilities,
- Nuclear revenue requirement, including depreciation expense and all taxes, and
- increase in Nuclear payment amounts and rate riders.

Form of Hearing

Energy Probe believes that due to the importance of the proceeding and the large amount of evidence, an oral hearing would be appropriate. Energy Probe understands that the applicant has requested an oral hearing and Energy Probe supports that request.

Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in

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proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

Communications

Communications relating to this Intervenor and Cost Eligibility Request Letter and all documents filed with the Board by the applicant and required by Energy Probe, should be directed to its consultants:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 tom.ladanyi@rogers.com	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 spainc@rogers.com
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Respectfully submitted on behalf of Energy Probe,

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
Consultant representing Energy Probe.

cc. Patricia Adams (Energy Probe Research Foundation)
Roger Higgin (Sustainable Planning Associates Inc.)
Evelyn Wong (OPG Regulatory Affairs)