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BY RESS

March 12, 2021

Ms. Christine Long
Registrar
Ontario Energy Board
27th Floor - 2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Long:

Re: EB-2020-0290 Application by Ontario Power Generation Inc.
For 2022-2026 Payment Amounts (the "Application")
Amendments to Pre-Filed Evidence

Enclosed are amendments to OPG's pre-filed evidence. OPG has submitted these documents through the Regulatory Electronic Submissions System. This material will also be available on OPG's website at www.opg.com. Appended to this letter is an updated Exhibits List with the date of updates as well as all exhibits with amendments.

One evidence amendment had an impact on approvals sought in the application:

- Corrections to deferral and variance account riders and associated rate smoothing impacts for 2022-2024. The nuclear riders are increased by $0.07/MWh in each of the affected years. This correction is rooted in Ex. H1-2-1, but has a cascading impact on multiple exhibits and tables due to corresponding changes in rate smoothing and cross-referencing:

    - Ex. A1-2-2 (Approvals)
    - Ex. A1-3-1 (Summary of Application)
    - Ex. H1-1-1 (Deferral and Variance Accounts)
    - Ex. H1-2-1 (Clearance of Deferral and Variance Accounts)
    - Ex. I1-1-1 (Summary of Revenue Requirement and Revenue Deficiency)
    - Ex. I1-1-2 (Customer Impact)
    - Ex. I1-3-1 (Nuclear Payment Amounts)
    - Ex. I1-3-2 (Payment Amount Smoothing)

  Exhibit I1-1-1 Attachment 1 (Revenue Requirement Work Form) was updated as a result and re-filed. The changes in each exhibit and any corresponding Tables are described below.

The following evidence amendments are corrections and clarifications that did not have an impact on approvals sought in the application:

- Corrections to Ex. A1-3-1 (Summary of Application) for editorial clarification and accuracy, as described below.

- An updated version of Ex. D2-2-4 (Contracts), Attachment 3 to reflect the impact of Amendment 12 in the RFR EPC contract summary. The update did not impact confidential information previously identified in the attachment.

- Corrections to Ex. D3-1-2 (Capital Projects – Support Services), including Tables 2a, 2b and 3, for editorial clarifications and accuracy, as described below.

- Corrections to Ex. F2-1-1 (Business Planning and Benchmarking – Nuclear) Table 2 for numerical corrections to FTE information for historical years (2016-2019), as noted below. This correction also impacts Ex. F2-2-1 (Base OM&A – Nuclear Operations) Table 2, Ex. F3-1-1 (Allocation of Support Services Costs) Table 7, and Ex. F4-3-1 (Compensation and Benefits) Attachment 1, as noted below.

- Correction to Ex. F3-3-2 (OM&A Purchased Services – Support Services) for accuracy, as described below.

- Corrections to Ex. F4-2-1 (Taxes) Tables 3a, 3b, 3c and 4 for numerical and presentation accuracy, as described below. The revisions did not impact the requested revenue requirement or the confidential information previously identified in Ex. F4-2-1 Table 4.

- Revisions to Ex. H1-1-1 (Deferral and Variance Accounts), including Tables 1a, 9, 10, 15 and 16, to align the presentation of information with prior applications, provide greater clarity in the calculations performed and make minor corrections, as described below.

- Corrections to Ex. I1-1-1 (Summary of Revenue Requirement and Revenue Deficiency), including Tables 2, 2a, 4 and 4a, and Ex. C1-1-1 (Capital Structure and Return on Equity) Table 7 to reflect a calculation error associated with the 2020 Return on Equity ("ROE") value rooted in Ex. I1-1-1 Tables 5 and 5a, as well as certain presentation and other corrections and clarifications in Ex. I1-1-1 Tables 2a, 4, 4a, 5 and 5a, as described below.

A more detailed description of the amended evidence is provided below:

#	Exhibit	Description of the Change
1.	A1-2-2 Approvals	• Page 3: Reflecting numerical corrections for deferral and variance account rate riders and associated rate smoothing changes identified in items 13 and 17 below. • Page 4: Clarification on items included within rate riders.
2.	A1-3-1 Summary of Application	• Pages 6, 13: Editorial clarifications. • Pages 11-12: Reflecting numerical corrections for deferral and variance account rate riders and associated rate smoothing changes identified in items 13 and 17 below.
3.	C1-1-1 Capital Structure and Return on Equity	• Table 7: Reflecting correction to the 2020 ROE value identified in item 14 below.
4.	D2-2-4 Contracts	• Attachment 3: Updated contract summary to reflect Amendment 12 to the RFR EPC Agreement.
5.	D3-1-2 Capital Projects – Support Services	• Page 11: Reflecting correction to Table 3. • Table 2a: Deletion of an editorial note. • Table 2b: Clarification of project description. • Table 3: Numerical correction to number of projects. Footnote was also clarified for accuracy.
6.	F2-1-1 Business Planning and Benchmarking – Nuclear	• Table 2: Numerical correction for Regular and Non-Regular FTEs for historical years (2016-2019).
7.	F2-2-1 Base OM&A – Nuclear Operations	• Table 2: Reflecting numerical corrections identified in item 6 above.
8.	F3-1-1 Allocation of Support Services Costs	• Table 7: Reflecting numerical corrections identified in item 6 above.
9.	F3-3-2 OM&A Purchased Services – Support Services	• Page 2: Correction of procurement process descriptions. Deleted a party that was incorrectly included.
10.	F4-2-1 Taxes	• Table 3a: Numerical corrections to line 7 for 2022-2024 to align with Ex. H1-2-1 Table 2, lines 15-17 and line 5 for 2026 to align with Ex. F4-3-2 Chart 1, with corresponding changes to calculated values in the table. • Table 3b: Reflecting numerical corrections in Table 3a above. • Table 3c: Reflecting numerical corrections in Table 3a above. Additionally, provided the rest of previously cut off note 6, corrected line (b) in note 6 table consistent with corrections in Ex. I1-1-1 Table 4a, note 12 identified below, added explanatory note to note 6 table, and corrected note 7 for accuracy.

		• Table 4: Values at line 1, cols. (f) and (g) were corrected for offsetting typographical errors, with corresponding changes at line 27 in those columns. Note 3 was revised to correctly reference Ex. G2-2-1, Table 7.
11.	F4-3-1 Compensation and Benefits	• Attachment 1: Reflecting numerical corrections identified in item 6 above.
12.	H1-1-1 Deferral and Variance Accounts	• Pages 1-2: Revision of values to correspond to correct reference and reflecting numerical correction identified in item 13 below. Additionally, footnote 3 was clarified for completeness. • Page 27: Editorial correction. • Table 1a: Footnote corrected for accuracy. • Table 9: Providing the rest of the previously cut-off note 4 and revising note 5 to correct reference. • Table 10: Note 2 corrected for accuracy. • Table 15: Presentation updated to align with prior application for ease of comparability (EB-2016-0152). • Table 16: Note 1 corrected for accuracy and to provide greater clarity.
13.	H1-2-1 Clearance of Deferral and Variance Accounts	• Page 5: Reflecting numerical corrections for deferral and variance account rate riders due to Table 2 correction below. • Table 2: Numerical correction to EB-2016-0152 approved credit balance amortization at lines 5 and 6, col. (b), which increased the nuclear rate rider by $0.07/MWh per year in 2022-2024.
14.	I1-1-1 Summary of Revenue Requirement and Revenue Deficiency	• Page 2, Chart 1: Reflecting correction to the 2020 ROE value identified below. • Table 1: Reflecting numerical correction for deferral and variance account rate riders identified in item 13 above and associated rate smoothing changes identified in item 17 below. • Table 2: Reflecting correction to the 2020 ROE value identified below. • Table 2a: Reflecting correction to the 2020 ROE value identified below. Also corrected notes 2, 3 and 8 for accuracy. • Table 4: Value at line 20 corrected and its presentation clarified by separating into lines 20 and 20a, with new line 20 reflecting a numerical correction in Table 4a, note 12 below and new line 20a now being consistent with Ex. F4-2-1, Table 3c, note 6, line (c) both of which resulted in a change to 2020 ROE value. Added corresponding reference to explanatory notes 14 and 15.

		• Table 4a: Corrected calculation and presentation of tax components of deferral and variance accounts in table at note 12. Added explanatory notes 14 and 15. • Table 5: Clarified presentation by separating line 20 into new lines 20 and 20a, and added corresponding reference to explanatory notes 14 and 15. • Table 5a: Corrected presentation of tax components of deferral and variance accounts in table at note 12. Added explanatory notes 14 and 15.
15.	I1-1-2 Customer Impact	• Table 2: Reflecting numerical corrections for deferral and variance account rate riders and associated rate smoothing changes identified in items 13 above and 17 below.
16.	I1-3-1 Nuclear Payment Amounts	• Page 1: Reflecting numerical corrections for deferral and variance account rate riders and associated rate smoothing changes identified in item 13 above and 17 below. • Table 1: Reflecting numerical corrections for deferral and variance account rate riders and associated rate smoothing changes identified in item 13 above and 17 below.
17.	I1-3-2 Payment Amounts Smoothing	• Removal of the footer incorrectly noting that the exhibit is privileged and confidential. • Pages 1, 8, 15: Reflecting changes to rate smoothing impacts as a result of numerical corrections to deferral and variance account rate riders in item 13 above.

Respectfully submitted,

Evelyn Wong

cc: Aimee Collier, OPG
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