AMPCO Interrogatory #75

Interrogatory

Reference: D2 T2 S2 P12

For the Unit 2 Early-In-Service projects, F&IP and SIO, compared to the OEB approved amount in EB-2016-0152 of $377.2M, there is a forecast total over-variance $171.2M. This variance is the result of increased costs of $100.9M for these projects, and declaring in-service $70.3M for new Unit 2 Early-In-Service projects.

Ref: D2 T2 S9 Table 1

a) Please provide a breakdown and description of the $100.9M variance.

b) For each of the Early In-service, F&IP and SIO projects shown below, please provide a schedule that sets out the forecast capital and in-service capital additions compared to actuals for each of the years 2010 to 2020.

DN	Breathing Air Capacity Enhancement[4]	73537	Unit Refurb - Early In-service
DN	Fuel Handling Powertrack Refurbishment[4]	73162/ 73562	Unit Refurb - Early In-service
DN	Water & Sewer Project [2]	73802	F&IP
DN	Darlington Energy Complex [2]	73803	F&IP
DN	Retube & Feeder Replacement Island Support Annex [2]	73810	F&IP
DN	Refurbishment Project Office [2]	73815	F&IP
DN	Third Emergency Power Generator	73360	SIO
DN	Containment Filtered Venting System	73365	SIO
DN	Shield Tank Overpressure Protection	73380	SIO
DN	Electrical Power Distribution System [2]	73821	F&IP

c) Please provide the contractor for each project.

d) Please provide the business case for each project.

e) Please provide any Project Over Variance Approvals.

f) Please provide the CPI and SPI performance metric results for the Facilities & Infrastructure Projects for the years 2015 to 2020.

g) Please provide the CPI and SPI performance metric results for the Safety Improvement Opportunities projects for the years 2015 to 2020.

Response

a) – g)

OPG declines to produce the requested information on the basis of relevance. The listed projects have either already been included in OPG's previously approved rate base (e.g., Water & Sewer Project, Darlington Energy Complex and Electrical Power Distribution System) or are included in the CRVA amounts related to DRP that OPG is not seeking to clear or include in rate base in this application. As such, the information requested is not relevant to any issue in this application.