AMPCO Interrogatory #81

Interrogatory

Reference: Ex D2 T2 S10

a) Please provide any internal audits of the D2O Storage Project undertaken by OPG's Audit and Risk Committee.

b) Please provide any external audits of the D2O Storage Project.

c) Please provide all reviews/reports undertaken by a third party related to the D2O project.

Response

a) All OPG internal audit reports completed since EB-2016-0152 regarding the Darlington Refurbishment Program have been provided in response to Ex. L-D2-02-SEC-084. Of that set, Attachment 14 relates to the D2O Storage Project. Additional OPG internal reports regarding the D2O Storage Project were produced as part of OPG's evidence in EB-2016-0152. Please see Ex. L-04.3-1-Staff-072, Attachment 29.

b) All external audit reports completed since EB-2016-0152 regarding the Darlington Refurbishment Program have been provided in response to Ex. L-D2-02-SEC-084. Of that set, those that relate to the D2O Storage Project are as follows:
- Attachment 2 (confidential),
- Attachment 12, and
- Attachment 18.

Additional external audit reports regarding the D2O Storage Project were produced as part of OPG's evidence in EB-2016-0152. Please see Ex. L-04.3-1-Staff-072, Attachments 1 to 11, 15, 19, and 22 to 27.

In addition, the Auditor General produced a public report titled, "The 2018 Auditor General Value for Money Report on the Darlington Nuclear Generating Station Refurbishment Project", which includes a discussion on the D2O Storage Project. The report can be found on the website of the Office of the Auditor General, p. 164, 3.02 Darlington Nuclear Generating Station Refurbishment Project (auditor.on.ca)

c) OPG declines to answer on the basis that this is not an appropriate question. The question ignores the principle of proportionality, which underlies the interrogatory

process, in that it is overly broad and all encompassing. Contrary to the OEB Rules of Practice and Procedure (Section 26.02 (d)), the question does not "contain specific requests for clarification of a party's evidence, documents or other information in the possession of the party and relevant to the proceeding."

The question seeks without limit all third party reviews and reports created over the more than 10- year span that covers the D2O Storage Project. This is likely to encompass hundreds of documents. Moreover, in the course of answering numerous more focused IRs from AMPCO and other parties, OPG is producing hundreds of additional documents (see for example, Ex. L-D2-02-AMPCO-137 which has 142 Attachments), many of which are reviews or reports. If after reviewing these documents, AMPCO believes specific additional relevant reports are required, it can request them at the technical conference.