CME Interrogatory #23

Interrogatory

Reference:
Exhibit D2, Tab 2, Schedule 11, Attachment 1

Dr. Galloway stated: "As noted during the Unit 2 assessment regarding OPG's policies and procedures, I found that the set of policies and procedures used to govern the execution of the Program *often* matched or exceeded industry standards and practice in their thoroughness and are appropriate for a Program of this size and complexity." Please provide a description of all instances where the policies and procedures used to govern the execution of the Program did not match or exceed industry standard and practice.

Response

The following response was prepared by Pegasus-Global Holdings Inc. ("Pegasus-Global"):

The findings from the review of OPG's individual policies and procedures are discussed within Section III of Dr. Galloway's testimony (Ex. D2-2-11, Attachment 1). While policy and procedure language may not have exactly "matched" an industry standard, Pegasus-Global found that the policies and procedures aligned with the intent and in many cases, exceeded industry standards. There were no policies or procedures reviewed that were found to not be in alignment with industry standards.