Environmental Defence Interrogatory #20

Interrogatory

Reference:
F2-1-1, Attachment 7

Preamble: "The updated schedule will provide electricity consumers with emission-free, low-cost energy and allow 4,500 high-quality jobs to remain in Durham region longer."

Questions:

(a) Please confirm how the above figure was calculated.
(b) Please confirm what the above figure translates into in terms of person-years FTE.
(c) Please provide correspondence between OPG and the Government of Ontario regarding the further extension of Pickering's life which details the impacts on jobs.
(d) Please summarize the impacts on jobs of the Pickering life extension.
(e) Does OPG believe the jobs number in the above quoted figure is accurate?
(f) Does OPG's mandate include the creation of jobs?
(g) Does the OEB's mandate include the creation of jobs?
(h) Please compare in person-years FTE the jobs that would exist in relation to Pickering over 2024 to 2026 in the scenario where it was shut down in accordance with the plan in the previous payment amounts application versus a scenario where it is shut down in the current plan.
(i) Please provide a table reconciling the jobs figures in the above reference with the evidence in this application regarding the headcount for Pickering's operations.
(j) Please break-out the total nuclear FTEs in 2020 to 2026 according to the following categories: i) employees working at the Pickering Nuclear Station, ii) employees working at the Darlington Nuclear Station, iii) employees working at other locations (e.g. head office) in support roles relating Pickering Nuclear Station, and iv) employees working at other locations (e.g. head office) in support roles relating to Darlington Nuclear Station.

Response

a) OPG cannot verify the basis for the reference to 4500 jobs in the Province of Ontario press release (Ex. F2-1-1, Attachment 7).

b) As OPG is unaware of the basis of the Province of Ontario's figure, it is unable to calculate person-years FTE or provide the requested table reconciling to this figure.

c) See Ex. L-F2-01-ED-15 a).

d) See part a) above.

e) See part a) above.

f) OPG is of the view that the optimization of Pickering shutdown will provide a benefit by the deferral of a loss of a significant number of highly skilled jobs in Durham region by 1 to 2 years.

g) OPG declines to respond on the basis of relevance. The questions seek detailed information on employment figures that are unrelated to the costs OPG is seeking to recover for extending Pickering's operation.

h) See part g).

i) See part g).

j) See Ex. L-F4-3-AMPCO-171 for the nuclear FTE's at Pickering and Darlington.