SEC Interrogatory #124

Interrogatory

Reference: F2-1-1, Attachment 6

With respect to the Goodnight Consulting, 2019 Nuclear Staffing Benchmarking Analysis Report:

a) What is the date of the information from OPG and the benchmark peer group?
b) Please provide a table that shows the peer group used in each of the 2011, 2013, 2014 and 2019 reports.
c) [p.16] The Report notes that information management was not benchmarked as it was done via a different method external to the study. Was this a decision made by Goodnight or OPG?
d) [p.19] Please revise the table to show 'Total OPG FTE' and '2019 Benchmarks' broken by i) Darlington, ii) Pickering 1-4, and iii) Pickering 5-8. Please provide the response in Excel format.
e) [p.20] Please provide OPG's views on what are the likely drivers for the functions with the largest variances from the benchmark (both positive and negative).
f) [p.20] For each function, please indicate if the numbers of the FTE have changed as a result of the DRP (i.e. less FTEs are required in 2019 as a result of Unit 2 being out of service).
g) [p.36] How was the PWR to CANDU adjustment determine and has that adjustment changed since the previous benchmarking study. If it has changed, please provide details.
h) [p.42] What would the benchmark total for each of Darlington, Pickering 1-4 and Pickering 5-8, if no 35-hour work week adjustment was made.
i) Please provide a copy of the questionnaire that Goodnight provided to the peer group.

Response

a) OPG's nuclear staffing data was as of August 31, 2019 and Goodnight Consulting has advised OPG that the benchmark peer group data was obtained in the middle of 2018.

b) Goodnight Consulting has provided the following response:

The peer group has remained the same throughout each study and includes the following large two-unit PWR sites: Arkansas Nuclear One, Beaver Valley, Braidwood, Byron, Calvert Cliffs, Comanche Peak, DC Cook, Diablo Canyon,

Farley, Hatch, Indian Point, Millstone, North Anna, Seqoyah, St. Lucie, South Texas, Vogtle.

c) OPG advised Goodnight Consulting that Information Management is benchmarked separately (Ex. F3-1-1, Attachment 2) and Goodnight Consulting excluded Information Management from the benchmarking analysis. This treatment is consistent with the 2014 Goodnight Staffing Benchmarking Study (EB-2016-0152 Ex. F2-1-1, Attachment 2, p. 14).

d) OPG cannot provide the requested information as the Goodnight nuclear staffing benchmarking methodology compares OPG Nuclear as a whole to the benchmark. As the Goodnight methodology compares a 2-unit PWR station to a 2-unit CANDU, this requires technical and scaled adjustments to the benchmark by reference to the 4-unit Darlington, 2-unit Pickering 1-4 and 4-unit Pickering 5-8 (see part h below). The Goodnight methodology does not however compare Pickering and Darlington to the benchmark separately as this would require allocation of OPG staff between Darlington, Pickering 1-4 and Pickering 5-8. Additionally, Pickering has operated as an amalgamated station since 2012.

e) Goodnight Consulting identified its views on what are the likely drivers for the functions with the largest variances from the benchmark (both positive and negative) and OPG accepts these views (Ex. F2-1-1, Attachment 6, pp. 23-28).

f) There is no direct impact to the number of full-time equivalent ("FTE") staff working on Darlington ongoing operations as a result of the Darlington Refurbishment Program because the level of FTE staff is largely fixed and does not scale up and down proportionally with how much electricity the Darlington units generate. This is consistent with the premise of the ScottMadden total generating cost per megawatt-hour ("TGC/MWh") methodology to normalize for refurbishment (Ex. F2-1-1, Attachment 4, p. 4). Operations and maintenance FTEs supporting Darlington Unit 2 cyclical outages[1] have been included in the OPG FTE staff compared to benchmark.

g) The PWR to CANDU benchmark staffing adjustments were determined by Goodnight's technical experts following meetings with OPG technical staff. The 2-unit raw adjustments were the same for each function compared to the previous Goodnight study, with the exception of one function that was amalgamated with Radiation Protection Support. The rationale for the previous study's adjustments was presented in EB-2016-0152, Ex. F2-1-1, Attachment 2, p. 22.

[1] Cyclical outages are described at Ex. F2-4-1.

h) The following response has been provided by Goodnight Consulting:

The following is an estimate in response to this question, rather than a detailed model. The results below reflect removal of the 52 FTEs for the 35-hour work week adjustment (Ex. F2-1-1, Attachment 6, p. 42), as well as reductions to the overall scaling, followed by a recalculation of the "Management" function to reflect a slightly smaller total staff benchmark. Consequently, the estimated benchmark totals would be:

Pickering 1-4:	1101
Pickering 5-8:	1952
Darlington:	1952
Total:	5005

i) See OPG's response to Ex. L-F2-01-Staff-220, part a).