Board Staff Interrogatory #214

Interrogatory

Reference:
Exhibit F2 / Tab 1 / Schedule 1 / Attachment 6
Exhibit F2 / Tab 1 / Schedule 1 / Table 2
Exhibit A1 / Tab 3 / Schedule 1 / pp. 6-7

Question(s):

a) Please confirm that Goodnight Consulting's (Goodnight) staffing benchmarking study (the Goodnight Study) was drafted before OPG made the organizational change described at Exhibit A1 / Tab 3 / Schedule 1 / pp. 6-7.

b) Please confirm that the Pickering Optimized Shutdown was not considered by Goodnight in its study.

Response

a) Confirmed. The data in the Goodnight Study is as of August 2019, before the OPG organizational change, which occurred later in 2020.

b) Pickering Optimized Shutdown was not considered by Goodnight as it commenced subsequent to the study date.