Environmental Defence Interrogatory #10

Interrogatory

Reference:
Exhibit F2, Tab 1, Schedule 1, Page 24-25

Preamble:

> "In EB-2016-0152, OPG presented the Pickering Extended Operations initiative aimed at operating Pickering Units 1 and 4 to 2022 and Pickering Units 5-8 to 2024 (EB-2016-0152, Ex. F2-2-3). OPG expects this initiative will be completed by 2021 at a total cost of $307M, consistent with the forecast presented in EB-2016-0152.
>
> This application reflects OPG's plans to safely optimize the shutdown 1 of Pickering by operating all six units until September 2024, five of the six units through 2024 and the remaining four units until December 2025, as per the 2020-2026 Business Plan ("Optimization"). OPG will require CNSC approval to operate the remaining four units past 2024 until December 2025."

Questions:

(a) Please complete the following table:

Planned Further Life Extension of Pickering Units			
	Shut Down Date per EB-2016-0152	Shut Down Date per Current Proposals	Duration of Proposed Extension
Unit 1			
Unit 4			
Unit 5			
Unit 6			
Unit 7			
Unit 8			

(b) Please provide another version of the above table with additional columns showing the previous shut-down dates that had been set in the past and changed per previous OPG plans and previous payment amounts applications.

(c) In EB-2016-0152, OPG filed analysis from the IESO regarding the cost-effectiveness of Pickering Extended Operations. Please file any IESO analysis relating to the life extension proposed in the current application. If no such IESO analysis is available, please explain why.

(d) Please provide the Total Generating Costs per MWh forecast for Pickering for each year until the end of its life, including allocated overheads. Please provide this for the station as a whole and broken out by unit (which is necessary as some units are being shut down earlier).

(e) Please provide all assumptions underlying these figures in (c), including the assumed generation for each year and the forecast days out-of-service. Please compare those assumptions in a table to the 5-year after generation amount and days out-of-service. Please provide this for the station as a whole and broken out by unit (which is necessary as some units are being shut down earlier).

(f) With respect to (c), please indicate if any costs relating to Pickering or that could be allocated to Pickering have not been included, itemize those, and provide values for each.

Response

(a) Refer to Chart 1:

Chart 1

	Shut Down Date per EB-2016-0152	Shut Down Date per Current Proposals	Duration of Proposed Extension
Unit 1	December 2022	September 2024	21 months
Unit 4	December 2022	December 2024	24 months
Unit 5	December 2024	December 2025	12 months
Unit 6	December 2024	December 2025	12 months
Unit 7	December 2024	December 2025	12 months
Unit 8	December 2024	December 2025	12 months

(b) Refer to Chart 2:

Chart 2

	Shut Down Date per EB-2013-0321	Shut Down Date per EB-2016-0152	Shut Down Date per EB-2020-0290
Unit 1	December 2020	December 2022	September 2024
Unit 4	December 2020	December 2022	December 2024
Unit 5	December 2020	December 2024	December 2025
Unit 6	December 2020	December 2024	December 2025
Unit 7	December 2020	December 2024	December 2025
Unit 8	December 2020	December 2024	December 2025

(c) OPG declines to respond this question on the basis of relevance. As the OEB has determined in the past four OPG payment amount applications, generation planning is not within the scope of OPG's payment amounts proceedings. As the OEB concluded in deciding OPG's last payment amounts application: "Consistent with previous proceedings and the OEB's findings on the Environmental Defence motion, the OEB finds that generation planning, including the economics related to generation planning, is not within the scope of this payment amounts proceeding." (EB-2016-0152, Decision with Reasons, December 28, 2017, p. 63 (footnotes omitted)). Based on this determination and similar determinations in prior payment amounts applications, it is clear that the IESO analysis is not relevant to any issue within the scope of this proceeding.

(d) For the station's Total Generating Costs ("TGC") per MWh, refer to Ex. L2-F2-01-Staff-196. OPG does not calculate a unitized TGC per MWh. The impact on the metric of Units 1 and 4 ending commercial operations in 2024 can be seen with the decline of TGC per MWh in 2025.

(e) Refer to part (c) of this response.

(f) Refer to part (c) of this response.