SEC Interrogatory #123

Interrogatory

Reference: F2-1-1, Attachment 5

With respect to the ScottMadden, A Study of Factors Impacting TGC / MWh Performance with Normalizing Adjustments to Facilitate Closer Comparison Report:

a. Has ScottMadden undertaken a similar econometric analysis for nuclear facilities before? If so, please provide details.
b. With respect to each of the charts contained on pages 4, 10 and 13:
   i. Please provide the information tabular format in Excel.
   ii. Please breakdown the information for each of 2015, 2016 and 2017, and provide the information in the same format as request in part (i).
   iii. Please provide updated information for each of 2018 and 2019, and provide the information in the same format as request in part(i).

Response

a) The following response has been provided by ScottMadden:

No. ScottMadden has performed many performance benchmarking engagements and many econometric analyses over the years, each adapted to the specific circumstances of its clients. Similarly, the study for OPG is adapted to OPG's specific circumstances.

b) The information requested in parts i.), ii.) and iii.) are provided in Attachment 1.[1] Attachment 1 has been provided in Excel format and filed separately on RESS as 'L-F2-01-SEC-123_Attachment 1.xlsx'.

[1] In Attachment 1, Oyster Creek's data has been included in the quartile performance data but has not been included in the plant level data as that plant shut down in 2018. Worksheet labelled "Non-Norm p4" is in reference to chart p. 4; worksheet labelled "Econometric p 10" is in reference to chart p. 10 and worksheet labelled "Full Normalization p13" is in reference to chart p. 13.