Environmental Defence Interrogatory #15

Interrogatory

Reference:
F2-1-1, Attachment 7
Preamble: "The Ontario government is supporting a plan by Ontario Power Generation (OPG) to safely extend the life of the Pickering Nuclear Station."

Questions:
(a) Please provide a table comparing the wording used by the Government of Ontario in relation to the current plan to extend the life of Pickering versus the wording used in relation to the Pickering Extended Operations at issue in EB-2016-0152.
(b) Please include Government of Ontario references regarding each project so they can be compared in their context.
(c) Does OPG take the position that the OEB must accept the need to extend the life of Pickering?
(d) Does the Ontario Government support the plan to extend Pickering's operations at any cost?
(e) Please provide all correspondence with the IESO regarding the current plan to extend the life of Pickering, especially any studies or cost-benefit analyses.
(f) Please provide all correspondence with the Government of Ontario regarding the current plan to extend the life of Pickering, especially any studies or cost-benefit analyses.

Response

a) OPG declines to produce the requested information on the basis of relevance. An examination of the precise wording of the Province's support for extending Pickering's operation is of no relevance to any issue before the OEB in this application.

b) See part a).

c) OPG's position is that the OEB's statutory responsibility in the current proceeding is to set just and reasonable payment amounts. To the extent that the OEB agrees that the Province of Ontario, pursuant to its responsibilities related to system planning and resource adequacy, has determined that Pickering should continue to operate, then OPG believes that the OEB cannot disregard that determination.

d) See Ex. L-F2-01-Environmental Defence-10 c).

e) See Ex. L-F2-01-Environmental Defence-10 c).

f) See part a).