OAPPA Interrogatory #7

Interrogatory

Reference:
Exhibit E2-1-1 PRODUCTION FORECAST AND METHODOLOGY – NUCLEAR page 2, line 7 says "and the end of commercial operations at Pickering by the end of 2025". At Page 6, lines 11-13 it reads:
"Pickering Optimized Shutdown: Under the Pickering optimized shutdown plan discussed in Ex. F2-1-1, Units 1 and 4 are forecast to be shut down in 2024, followed by the staggered shutdown of Units 5-8 at the end of December 2025."
From Exhibit F2-1-1, page 1, lines 15-18 it reads:
"Highlights of OPG's 2020-2026 Business Plan as it pertains to Nuclear Operations include the following:
- Ensuring the success of Pickering Optimized Shutdown of all six Pickering units, operating Unit 1 and Unit 4 to 2024 and Units 5-8 to 2025."

From Exhibit F2-1-1, page 25, lines 1-4:
"This application reflects OPG's plans to safely optimize the shutdown 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."
But from Exhibit H1-1-1, Updated 2021-03-12 DEFERRAL AND VARIANCE ACCOUNTS at page 40, lines 8-14 it reads:
"OPG proposes the deferral account because it anticipates that there will be future changes to the Pickering station EOL dates, for financial accounting purposes in accordance with US GAAP, once necessary criteria are met. In particular, this includes the accounting EOL date for Pickering Units 5-8, which is expected to be reassessed in the future when further technical work and the status of the CNSC's approval process are considered to provide sufficient high confidence, for depreciation purposes, with respect to the planned operation of the units beyond the current EOL date of December 31, 2024."

(a) Is the evidence at Exhibit H1-1-1, page 40, lines 8-11 inconsistent with the references found at E2-1-1 and F2-1-1, as excerpted above? Please explain any inconsistencies in the evidence related to the EOL dates for Pickering units.
(b) What is the risk/chance that the CNSC will not approve the proposed EOL dates for Pickering units 5-8?
(c) What are the consequences and risks if the CNSC does not approve the proposed EOL dates for Pickering units 5-8?

Response

a) Refer to Ex. L-F2-01-Staff-209.

b) Refer to Ex. L-F2-01-Staff-213, parts (e) and (f).

c) Refer to Ex. L-F2-01-Staff-213, part (g).