**Attachment 3**

**EB-2020-0290 Interrogatories**

**Table 2 – Information Unavailable**

| IR Number | Questions | Response |
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| Staff-206 | a) Please comment on the overall benchmarking performance of both Pickering NGS and Darlington NGS when compared to the other Canadian CANDU utilities (i.e., Bruce Power, NB Power) in those areas where comparable data is available. | a) OPG's total generating cost per megawatt-hour ("TGC/MWh") benchmarking performance is based on Electric Utility Cost Group ("EUCG") data. NB Power is not a member of EUCG. Therefore, OPG cannot comment on performance in relation to NB Power. In 2019, Bruce Power's benchmarking performance was favourable compared to OPG in respect of non-normalized TGC/MWh at the major operator level (Ex. F2-1-1, Attachment 2, p. 88). |
| Staff-211 | a) Using the tabular format below, please provide Cash Working Capital, Fuel Inventory, and Materials & Supplies balances for Pickering on an annual basis from 2016 to 2026. Please provide actual balances for historical years and forecast balances for future years. | The requested balances for Pickering NGS are provided in the chart below, as of each corresponding year-end, with the exception of cash working capital. Cash working capital is determined on an overall basis for the nuclear business and, given the nature of the calculations and inputs, is not attributable to specific stations. This includes the fact that a single payment amount is used to derive electricity generation revenue from both stations. As described at Ex. B1-1-2, p. 2, the nuclear cash working capital requirement for 2022-2026 has been set by applying net lag days to actual financial results for the prescribed nuclear assets as a whole for 2019. |
| Staff-224 c) | c) Please provide the monthly base OM&A costs for 2022-2026 attributable to Darlington NGS. Please discuss how the varying number of units being offline in a given month for refurbishment during the 2022-2026 Custom IR term has been reflected in the proposed base OM&A costs. For example, in 2022 there are 685 DRP-related planned outage days (reflecting that in some months two units are offline for refurbishment). While in 2023, there are 838 DRP-related planned outage days (reflecting that in some months three units are offline for refurbishment). | a) OPG's business planning process involves monthly OM&A detail being planned only for the first several years of a planning period. As such, Base OM&A costs have been planned on a monthly basis up until 2022 and therefore monthly detail is not available for 2023-2026. The monthly costs for the 2022 plan are provided in the table below:<br><br>…<br><br>Note that OPG plans and internally reports costs by fiscal month, rather than by calendar month. In 2022, there are five fiscal weeks in January, April, July and October, while there are four fiscal weeks in the other fiscal months. As a result, there is variability in the monthly costs shown.<br>The majority of costs associated with Darlington remain fixed during refurbishment as discussed in Ex. L-F2-02-Staff-230 |

| IR Number | Questions | Response |
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| Staff-227 | a) Please provide the monthly base OM&A costs for 2022-2026 attributable to Pickering NGS. Please explain how partial year impacts of the Pickering NGS shutdown have been reflected in the proposed base OM&A costs (as applicable). | a) OPG's business planning process involves monthly OM&A detail being planned only for the first several years of a planning period. As such, Base OM&A costs have been planned on a monthly basis up until 2022 and therefore monthly detail is not available for 2023-2026. The monthly costs for the 2022 plan are provided in the table below:<br><br>…<br><br>Note that OPG plans and internally reports costs by fiscal month, rather than by calendar month. In 2022, there are five fiscal weeks in January, April, July and October, while there are four fiscal weeks in the other fiscal months. As a result, there is variability in the monthly costs shown.<br><br>The following table summarizes annual Pickering NGS Base OM&A by function over 2023-2026 (see also Ex. F2-2-1, Tables 10-13). |
| Staff-280 c), d) and f) ii) | c) Please provide the average and distribution of the contribution ratios of the organizations included in the pension and benefits comparator group in the WTW Total Compensation Benchmarking Study.<br><br>d) If available, please provide the contribution ratio of Bruce Power.<br><br>f) Please provide an updated version of the employee:employer pension contribution chart that includes:<br>ii. OPEB | c) Neither OPG nor WTW has the requested information.<br><br>d) Neither OPG nor WTW has the requested information.<br><br>f) ii) The employee/employer contribution ratios shown in Ex. F4-3-1, Figure 9 relate only to OPG's registered pension plan, which is funded. As noted in the preamble, OPEBs are separate from the pension plan and are pay-as-you-go arrangements that are not funded. As a result, a chart showing the employee/employer contribution ratios including OPEBs cannot be provided. |
| Staff-285 e) | e) For comparability to previous compensation benchmarking studies, please provide the 2019 benchmarking results based on the three segments that were previously used and the same compensation data that was provided to WTW. If this is not possible, please explain why. | (e) As explained in Ex. F4-3-1, pp.23-24, OPG no longer segments its work force into utility and general industry, and has no plans to do so going forward. To respond to this request, OPG would have to re-segment the current workforce, then match the jobs in each segment to those in the comparator companies and re-perform the benchmarking. This will require a number of weeks of work that when completed would have no bearing on OPG's requested compensation. Finally, the fundamental grouping of OPG's workforce is the division into management, PWU and Society. As these groups have not changed, the benchmarking for them in this application is fully comparable to the benchmarking for these groups produced in previous applications. |

| IR Number | Questions | Response |
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| AMPCO 59 (partial) | Please complete the attached spreadsheet (D2-AMPCO-59 Attachment A) and provide the excel version. | This interrogatory asks for year over year comparisons of OEB approved expenditures to Actuals for each Tier 1 project in this application for each year of the EB-2016-0152 IR term. The OEB did not approve a forecast of nuclear operations capital expenditures by project, but instead approved a nuclear revenue requirement that reflects capital in-service amounts, not capital expenditures, and resulting rate base values.<br><br>In Attachment 1, OPG has provided responsive information with the following modifications to address the points noted in the first paragraph and to allow OPG to respond within the timeframe established. For each project listed, OPG has provided the forecasted total project expenditure over 2017-2021 at the time of EB-2016-015. This total is compared to OPG's current actual/forecast expenditures for each project on an aggregate basis for 2017-2021. Unallocated or newly identified projects did not have forecast expenditures at the time of EB-2016-015 as these projects did not have an approved Business Case Summary ("BCS"). |
| AMPCO-89 d) and e) | d) Please provide the forecast versus actual overtime costs allocated to the D2O Storage Project by year over the course of the project for all staff, contractors and trades workers.<br>e) Please provide all correspondence to contractors instructing or approving them to work premium overtime hours. | d) OPG is unable to provide the requested information as it is not available. OPG did not forecast overtime and thus cannot provide the annual use of overtime against forecast.<br><br>e) OPG is unable to provide the requested information as it is not available. |
| CCC-1 | c) The projected overall costs of those engagements broken out by costs incurred to date and forecast costs | OPG has not provided a forecast of the costs for each engagement as the remaining costs to be incurred will be dictated by the level of involvement of each consultant throughout the balance of the proceeding. As noted in response to Ex. L-F3-01-VECC-029, OPG's actual costs on these engagements will not be included for recovery over the 2022-2026 IR term. |
| ED 28 (partial) | a)Please provide OPG's forecast of its: a) nuclear payment amount ($/MWh); and b) nuclear payment rider ($/MWh) for each year from 2027 to 2041 inclusive | Partial - Consistent with EB-2016-0152, Ex. N3-1-1, Attachment 2, Table 14, OPG has provided the forecast of smoothed nuclear payment amounts to the end of the deferral period, being 2036. OPG does not have a forecast of payment riders beyond those requested in this application and has no basis on which to produce one. |
| EP-21 (partial) | Please file a table showing the continuity of contingency, starting with contingency approved by the OEB in EB-2016-0152, showing the amounts of contingency used each year since the start of the DRP and the forecast of remaining contingency for each year of the DRP. For each year please explain why the contingency was used and what it was used for. | OPG cannot provide a forecast of usage of the remaining contingency, by year, until the end of the DRP. To do so would require perfect foreknowledge, both of when the risks OPG has used to develop the contingency requirement may arise, as well as the timing and impact of any unforeseen risks which may arise and, therefore, exactly how much contingency would be required to mitigate these risks. |

| IR Number | Questions | Response |
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| EP-73 a) | a) Please prove a Table similar to Chart 1 that shows the Base revenue requirement and the calculated smoothed increases for 2021-2026 expressed based on customer consumption levels of 500, 700. 1000 KWh per month. | Ex. I1-1-2, Table 1 provides the bill impact for a residential customer with a consumption level of 700 kWh as a "typical bill". OPG is able to estimate the annualized residential customer impacts by largely relying on the OEB's Bill Calculator, which provides a sample bill calculation for each distributor within the province using Time of Use rates that OPG then averages to arrive at a typical bill value. The tool provides, as a default, off-peak, mid-peak and on-peak usage for a 700kWh residential customer, which is necessary to perform the bill calculation. OPG does not have this information for 500kWh or 1000kWh customers and so is unable to perform the bill calculations requested for these consumption levels. |
| OSEA-1 part 6 | (6) Please provide an estimate of Surplus Baseload Generation ("SBG") in 2020 that was directly related to delaying the refurbishment of Darlington Unit 3.<br>part 8) Has OPG undertaken an analysis comparing the system-wide benefits to ratepayers of<br>using PGS uneconomically (i.e. time-shifting at a loss) compared to SBG cost recovery?<br>For example, would it be better value for ratepayers to make OPG<br>financially whole on uneconomic time-shifting compared to the full regulated rate<br>earned through SBG volumes? | 6. OPG is unable to provide the requested information. SBG conditions occur based on the entirety of the IESO Administered Market (supply, demand and inter-jurisdictional trade). It is not possible to isolate the impacts on SBG from changing the production of any one resource in isolation. |
| PWU 18 (partial) | Please provide the cost savings from the pension reforms, with calculations, separately for a) Employee Contribution Increases, b) Earnings Basis for Pension, and c) Retirement Eligibility for an Undiscounted Pension. | The figures were calculated by Aon using actuarial methods, assumptions and plan membership data, consistent with those set out at Ex. F4-3-2, Attachment 1. Given the complexity of actuarial models and the volume of underlying data, underlying calculations cannot be reasonably reproduced in this response. |
| SEC-6 | Please restate the bill impacts in 2022 through 2026 to reflect a typical school with nuclear usage of 11,000 kwh per month. | OPG does not have the information necessary to complete this calculation. OPG is able to estimate the customer bill impacts in Ex. I1-1-2 by largely relying on the OEB's Bill Calculator, which provides a sample bill calculation for each distributor within the province using Time of Use rates that OPG then averages to arrive at a typical bill value. A similar tool is not available for a typical school. |
| SEC 22 | Please provide a complete list of the "equity and credit analysts" interviewed, and in each case provide either a CV or a link to a bio on their employer's website. | Please see in Exhibit C1-1-1, Attachment 1, at 22, footnote 37, for a list of survey participants and the firms by which they are employed. In each case, the survey participants were equity or credit analysts who cover the North American utility industry. To Concentric's knowledge, the analysts' firms do not provide CVs or bios for their analysts. |

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| SEC-27 | Please provide the name, affiliation, and CV of the analyst who "commented that the equity thickness and ROE in Ontario are inferior to many other jurisdictions, especially those in the U.S. While this difference historically was acceptable, the analyst saw the improving regulatory framework in the U.S. as cause for concern that the equity thickness and ROE in Ontario could lead to challenges in incenting capital to flow to the province." | See the response to C1-SEC-22. Analysts who participated in Concentric's survey did so with the understanding that their names and firms would be included in Concentric's report, but without attribution for specific statements. Please see the response to CME-24 for the survey questions and full answers provided from the analysts interviewed as part of Concentric's report. |
| SEC - 41 | Please provide a quantitative comparison to show that OPG has historically recovered a lower percentage of its deferral and variance accounts than other electric utilities in Ontario. | Concentric's report does not assert that "OPG has historically recovered a lower percentage of its deferral and variance accounts than other electric utilities in Ontario," nor has Concentric conducted the quantitative comparison requested. As discussed in Concentric's Report at pages 71-72, and in the response to C1-Staff-47, Concentric considered the general comparability of OPG's deferral and variance accounts ("DVAs") to other regulated electric utilities in Ontario, and considered related risks on a forward-looking basis. Concentric observed that the majority of OPG's DVAs would be classified as Group 2 accounts, which require a prudence review by the OEB before the utility is allowed to recover these costs. By contrast, Group 1 accounts do not require a prudence review. Concentric also reviewed a sample of other electric utilities in Ontario and determined that those companies have a mix of Group 1 and Group 2 DVAs. On that basis, Concentric concluded that OPG has relatively greater risk related to cost recovery for its DVAs than do other electric utilities in Ontario.<br><br>In any event, it is not feasible to perform the analysis requested within the period provided for interrogatory responses as it would require a detailed review and analysis of filed evidence and decisions in dozens of OEB rate applications. |

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| SEC 148 | With respect to the Willis Towers Watson ("WTW"), Total Compensation Benchmarking Study ("Study"), for each of the Total Results by Job Family (Excluding Nuclear Authorized) Tables for PWU, Society and Management, please provide revised tables on a similar basis that show OPG compensation as compared to the following sample/peer groups:<br>a. Total utility organizations<br>b. Total general industry organizations<br>c. Total private sector organizations<br>d. Total public sector organizations<br>e. Private sector utility organizations<br>f. Private sector general industry organizations<br>g. Public sector utility organizations<br>h. Public sector general industry organizations | OPG declines to undertake the requested analyses as they cannot be completed with reasonable effort. Each request would require a significant amount of work as the benchmarking analysis would need to be replicated for each sample/peer group. In essence, this IR seeks the re-creation of the core of the existing report eight times. In addition, the smaller sample/peer groups may result in limited data by benchmark position and provide results that are more volatile. Finally, this approach does not align with OPG's talent strategy and current compensation philosophy on how compensation is managed across the organization. |
| SEC-258 | a) Please quantify the estimated impact on the results of the costs allocated due to the changes to the methodology.<br><br>b) If OPG is not able to quantify the impact, please explain how OPG concluded that there is not a material impact. | (a) - (b)<br>An indicative estimate of the impact of the changes to the methodology is a net increase of approximately 1% to the annual corporate support services and centrally-held OM&A costs attributed to the nuclear business. This was produced based on a parallel simulation of model results performed in the prior year using an offline database, as part of implementing the changes.<br><br>OPG is unable to quantify the precise impact of the changes to the methodology on the results of the allocations as presented in the application more precisely without retrofitting its cost allocation model to the previous methodology – a task that would require a disproportionate amount of time and effort including changes in programming logic to the model. |
| SUP-22 a) and c) | a) In response to F4-SUP-18 a) 1), OPG has provided annual ETE as well as Term FTE's and compensation separately. Using this data, in a fashion similar to the analysis provided re: Projected Impact of PWU Terms Incumbents, please estimate the ballpark impact of inclusion of ETEs on 2019, 2020 and 2022 population<br>Society compensation. This would be for Base Salary, Total Direct Compensation, Total Remuneration Excluding PTO, and Total Remuneration.<br><br>c) Please estimate the impact on OPG Overall compensation of 2020 and 2022 population ETEs and Terms. | a) - c)<br>OPG declines to undertake the requested analysis to include ETEs as it cannot be completed with reasonable effort. The 2019 compensation benchmarking study did not include ETEs, and as such, the requested analysis would require a significant amount of work to re-perform the benchmarking. |

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| SUP-26 c) | c) If the answer to a) is no, please normalize the WTW Compensation Benchmarking Study results to take into account the price differentials from province to province for consumer goods and services. It would suffice to update the summary table of results as found on p13 of the WTW study. Please use the city price differentials for 2019, as determined by Statistics Canada and provided in the table above, as proxies for the price differentials for the province which each city is located in. In the case of Ontario, use the Toronto price differentials for companies headquartered in the GTA, and; for companies headquartered elsewhere in Ontario, use the Ottawa price differentials. For each company used in the WTW peer group, assume the operations of the company is in the province which is home to its head office.<br><br>If possible, also please normalize for differences in provincial sales tax rates. This is material as there are significant differences in the provincial sales taxes (PST). For example, quite a number of the companies in the WTW study peer group are located in Alberta which has a 0% PST, whereas in Ontario it is 8% PST. So for every dollar earned by an individual in Alberta, a person employed in Ontario would have to earn the equivalent of the 8% PST paid annually on purchases, in order to earn the same income, before even taking into account cost of living differences amongst the peer group companies. | (c) WTW is not able to normalize results in the 2019 compensation benchmarking report to account for price differences for consumer goods and services for a number of reasons. First, the report is based on the cost of labour in each region which is not directly impacted by differences in cost of living and taxes. Cost of labour is more dependent on the market competitive nature of the labour market in each region and whether compensation needs to be higher / lower to reflect the region's cost of living / taxes. Second, the use of sales taxes to adjust compensation likely overstates the amount of sales taxes paid which is based on purchases made and not compensation received. Further, the proportion of taxable purchases likely varies by compensation level. Finally, the suggested adjustments based on company headquarter location would not account for the location in which employees might be actually located, which can be beyond headquarter location. |