ONTARIO POWER GENERATION

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**BY RESS**

Ms. Christine E. Long
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON
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April 19th, 2021

Dear Ms. Long:

**Re: EB-2020-0290 Application by Ontario Power Generation Inc.**
**For 2022-2026 Payment Amounts (the "Application")**
**Interrogatory Responses**

Attached please find OPG's responses to interrogatories from OEB staff and intervenors. OPG has submitted these document through the Regulatory Electronic Submissions System. This materials will also be made available on OPG's website at www.opg.com.

***Interrogatory Responses – Naming and Submissions***

Consistent with Procedural Order 1, interrogatories were submitted by OEB staff and intervenors using the exhibit reference. Given the breadth of information covered under each of OPG's exhibits, OPG has provided both the exhibit and tab reference. This has allowed for interrogatories on similar topics to be sorted more closely together. The responses are sorted by exhibit-tab reference and within each exhibit-tab reference by party.

OPG has made its best efforts to file responses on time. However, because of the very large number of interrogatories received, 1,000 in total, there are 61 interrogatory responses that remain to be filed. These interrogatories are listed in Attachment 1. OPG will file the remaining responses by Monday, April 26, 2021.

***Confidentiality***

Certain documents within the application contain confidential information. Under separate cover, and in accordance with the Ontario Energy Board's *Rules of Practice and Procedure and Practice Direction on Confidential Filings*, OPG requests confidential treatment of this information.

Certain documents are marked as confidential but the redacted public versions filed with the interrogatory responses are not confidential.

***Refusals and Information Unavailable***

Pursuant to Procedural Order Number 1 (p. 7) requiring OPG to file an index of refusals, please find the following two tables attached as Attachments 2 and 3 respectively:

- Table 1 – Refusal
- Table 2 – Information Unavailable

Table 1 addresses those interrogatories where OPG declines to provide a response. Table 2 addresses those interrogatories where OPG does not have the information requested and cannot produce it with reasonable effort. In both tables, OPG provides the full reason for why OPG either declines to provide a response or why the information cannot be produced.

If you have any questions regarding this submission, please contact me at 416-592-2181.

Respectfully submitted,

Evelyn Wong

CC:
Aimee Collier (OPG) via e-mail
Charles Keizer (Torys LLP) via e-mail
Crawford Smith (Lax O'Sullivan Lisus Gottlieb LLP) via email