

April 27, 2021

Ms. Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: EB-2020-0290 Ontario Power Generation Payment Amounts Application

We are legal counsel to Ontario Power Generation (“OPG”). This letter is in response to the correspondence of Environmental Defence (“ED”) dated April 27, 2021 wherein ED has requested an order that OPG release certain Independent Electricity System Operator (“IESO”) and OPG analysis relating to the life extension of the Pickering Generating Station.

With respect to OPG analysis, OPG notes that in response to interrogatory Ex. L-F2-01-Environmental Defence-013, OPG attached its Business Case Summary that supports the incremental work and related costs to enable the Pickering optimized shutdown. This attachment forms OPG’s analysis and ED can ask further questions in this regard at the Technical Conference, to the extent ED’s questions are relevant.

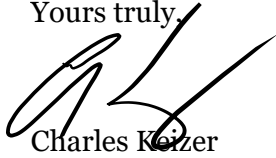
With respect to any IESO analysis, this is information that can only be addressed by the IESO and the disclosure of this information at this juncture would not assist ED in respect of any inquiries that it may have of OPG at the Technical Conference. As a result, ED would not be prejudiced if the consideration of ED’s motion is deferred by the OEB to the OEB’s Motions Day scheduled for May 21, 2021. OPG believes that this is consistent with the intent of Procedural Order No.1.

ED has proposed a timeline in respect of its motion suggesting that OPG file its response to ED’s motion by noon on Thursday April 29, 2021 with ED’s reply filed by the end of day April 29. OPG submits that the ED proposed OPG deadline is unreasonable. However, if the OEB determines that it will not postpone ED’s motion to the Motions Day, OPG could file its response by noon on Friday April 30, 2021. ED can file by the end of day April 30, which, from a timing perspective, is on the same basis as originally proposed by ED.

ED has also proposed that OPG file the IESO information in question on a without prejudice basis to any arguments OPG wishes to make in the proceeding. It is OPG’s view that the information is irrelevant for the purposes of establishing payment amounts and as such, is not properly addressed at the Technical Conference, and to permit questions at the Technical

Conference would consume valuable time at the Technical Conference, especially given that OPG cannot otherwise address the analysis of the IESO.

Yours truly,



Charles Keizer

cc: Aimee Collier, OPG
Crawford Smith, Lax O'Sullivan Lissus Gottlieb LLP
Michael Millar, OEB
All parties