

Elson Advocacy

April 28, 2021

BY EMAIL AND RESS

Ms. Christine Long

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Long:

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

I am writing on behalf of Environmental Defence to respond to the letter sent by OPG asking the OEB to defer ruling on Environmental Defence's motion until after the technical conference is over.

OPG argues that it need not release further information prior to the technical conference because it has already released a Business Case Summary. However, this is just a *summary* of OPG's cost-benefit analysis.¹ It does not contain many important underlying figures and assumptions.² By withholding this information, OPG will prevent intervenors from asking about the assumptions and exploring whether they are consistent with the assumptions underlying the cost recovery sought by OPG in this proceeding.

OPG also argues that it cannot answer questions regarding the IESO analysis. However, OPG can answer questions about the information it provided to the IESO (e.g. production forecasts) and the conflicts between the IESO's assumptions and OPG's assumptions. OPG evidence makes references to there being conflicts in assumptions but does not provide the underlying information that would allow intervenors to understand and explore this.³

Without the underlying documentation, we cannot predict exactly what questions we would ask at the technical conference. However, we expect to explore, for example, whether the production forecasts and staffing assumptions underlying OPG's requests for cost recovery in this proceeding are consistent with the assumptions used in their cost-benefit analysis, and if not, why not.

¹ For example, it contains only an "Economic Assessment Summary" (emphasis added); F2-01-Environmental Defence-013, Attachment 1, Page 14.

² For example, it notes differences in assumptions as between OPG and the IESO without disclosing the actual figures in question in F2-01-Environmental Defence-013, Attachment 1, Page 16.

³ F2-01-Environmental Defence-013, Attachment 1, Page 16.

According to OPG's business case, the estimated incremental costs for the extended operations at Pickering will be \$1.615 billion.⁴ That is not a small number. In our view, it is reasonable for intervenors to be given an opportunity to ask some questions about the cost-benefit analysis and assumptions relating to this proposed \$1.615 billion in incremental spending, especially when this is contained in pre-existing documentation that can be released with little or no effort.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', with a stylized, cursive script.

Kent Elson

cc: Parties in the above proceeding

⁴ F2-01-Environmental Defence-013, Attachment 1, Page 13.