ONTARIO POWER GENERATION

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April 30, 2021

VIA RESS (LETTER ONLY)

Ms. Christine Long
Registrar
Ontario Energy Board
27th Floor - 2300 Yonge Street
Toronto, Ontario M4P 1E4

Dear Ms. Long

Re: Application by Ontario Power Generation Inc. for 2022-2026 Payment Amounts (EB-2020-0290) – Request for Confidential Treatment re: Interrogatory Responses

In accordance with Rule 10 of the Ontario Energy Board's ("**OEB**") *Rules of Practice and Procedure* and section 5.1 of the OEB's *Practice Direction on Confidential Filings* (the "**Practice Direction**"), Ontario Power Generation Inc. ("**OPG**") hereby requests confidential treatment for 38 interrogatory responses, 56 documents, and 1 Excel file, or portions thereof, that are included as OPG's responses to certain interrogatories. A list of the affected interrogatory responses and documents is provided in **Appendix 'A'**.

Under the heading "Reasons for Confidential Treatment", below, OPG sets out the reasons for the confidentiality requests, including why public disclosure would be detrimental to OPG (and in some instances, to third parties). While most of the requests are for redactions to portions of interrogatory responses or documents, a very small number of the requests are for the confidential treatment of entire documents, as identified below.

Given the participation in this proceeding of OPG's two labour unions, the Power Workers' Union ("**PWU**") and the Society of Energy Professionals ("**Society**"), OPG has a particular concern with the possibility of certain confidential information, which has the potential to interfere with collective bargaining negotiations, being disclosed to either PWU or Society. While OPG has ensured that any such information has been marked as confidential and would be redacted from the public record, this information would in the normal course be available to those who file a Declaration and Undertaking. OPG understands that the OEB typically accepts Declarations and Undertakings from counsel, experts or consultants to a party. Notwithstanding the filing of a Declaration and Undertaking by any expert or consultant on behalf of PWU or Society, OPG requests that OPG's labour-related confidential information, identified in Section (d) below (Collective Bargaining Documentation), be withheld from such experts or consultants who have not also filed an affidavit with the OEB affirming that they are external to and at arms-length from the PWU and Society, as applicable, and that they are not and will not be involved in any collective bargaining-related activities on behalf of PWU or Society. This is consistent with the OEB's findings in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence).

Requests for Permanent Redaction of Personal Information under FIPPA

OPG is proposing to permanently redact, without disclosure except to the OEB, personal information, in accordance with Rule 9A of the OEB's *Rules of Practice and Procedure* and section 4.3.1 of the Practice Direction. Under a separate cover letter that will be marked "For OEB Review Only", to be sent concurrently, OPG provides unredacted versions of the relevant pages from the affected documents.

Requests for Permanent Redaction of the Business Plan, Business Planning Instructions, and Board Memo

On December 31, 2020, OPG requested permanent redactions, without disclosure except to the OEB, of certain information in the Amended 2020-2026 Business Plan (the "**Business Plan**") and the Amended 2020-2026 Business Planning Instructions (the "**Business Planning Instructions**").

On April 15, 2021, the OEB issued a decision with respect to OPG's request for permanent redactions in the Business Plan and Business Planning Instructions, and requested OPG to re-submit the Business Plan and Business Planning Instructions with additional supporting rationale.

Additionally, in response to an interrogatory, OPG is proposing to permanently redact, without disclosure except to the OEB, certain information in a board memo dated October 19, 2020 prepared in relation to the Business Plan (the "**Board Memo**").

Under a separate cover letter that will be marked "For OEB Review Only", to be sent concurrently, OPG provides: i) additional supporting rationale for the Business Plan and the Business Planning Instructions redactions; ii) supporting rationale for the Board Memo redactions; and iii) unredacted versions of each document.

Attachments

As a result of the various categories of redactions in its filing, OPG attaches the following (a separate, non-confidential version of this letter attaches all but Attachment A):

1. **Attachment 'A':** *Confidential*, unredacted versions of the interrogatory responses and documents that are the subject of this request (except that permanent redactions will remain redacted). These documents are intended to be treated confidentially and should only be provided to intervenors or their representatives who sign, or have already signed, a Declaration and Undertaking in the prescribed form in this proceeding. The specific portions of these documents constituting the confidential information are marked with red boxes.

2. **Attachment 'B':** In support of OPG's request for certain redactions, a copy of the Decision on Confidentiality – Pre-filed Evidence dated April 13, 2021.

3. **Attachment 'C':** In support of OPG's request for certain redactions, a copy of Procedural Order No. 1 of EB-2020-0290.

In this request, OPG references several prior OEB decisions on the confidential treatment of OPG information. These include procedural orders and decisions from EB-2013-0321 and EB-2016-0152. As copies of these referenced materials were included in OPG's December 31, 2020

request for confidential treatment of certain documents forming part of its pre-filed evidence, OPG has not re-filed these materials with the present request.

OEB Procedure:

Pursuant to the OEB's announcement on June 23, 2020 with respect to the OEB Digitization Program, OPG is providing this letter along with the attachments electronically through the OEB Regulatory Electronic Submission System.

As an interim measure for efficiency, prior to the OEB making its final determination on OPG's request for confidential treatment, OPG would be amenable to proceeding as though OPG's request for confidentiality has been granted. However, OPG reserves the right to submit that it may not be appropriate for any particular intervenor to review certain confidential information even though it has completed and signed a Declaration and Undertaking. This may arise, for example, if the intervenor may gain an unfair competitive advantage simply by being an intervenor who has signed a Declaration and Undertaking. The OEB has made orders of this nature in prior OPG proceedings, such as in Procedural Order No. 4 in EB-2016-0152.

On a final determination, should the OEB grant OPG's request for confidentiality, OPG proposes that the OEB order the documents be disclosed, subject to any conditions the OEB may find appropriate, to only those persons that by then have already signed, or that subsequently sign, a Declaration and Undertaking.

In addition, consistent with section 6.2 of the Practice Direction, OPG requests that during oral proceedings any reference to information which the OEB has determined to be confidential, be conducted *in camera* to preserve its confidential nature.

In the event that OPG's confidentiality request is refused, in whole or in part, and OPG in turn requests that some or all of the information that is the subject of this request be withdrawn in accordance with section 5.1.12 of the Practice Direction, all persons in possession of the said information will be required to promptly destroy the information and confirm its destruction in accordance with the Declaration and Undertaking.

Reasons for Confidential Treatment

OPG is requesting confidential treatment of information contained in a number of interrogatory responses and documents, which, based on their nature, can largely be categorized as:

a) references to vendor/contractor performance,
b) commercially sensitive information in nuclear business case summaries,
c) pricing information and labour rates in DRP documents,
d) collective bargaining documentation,
e) tax information,
f) combined regulated and unregulated assets and business of OPG,
g) heavy water sales information,
h) third party rates and information,
i) Clarington Corporate Campus information, and
j) other responses and documents that do not fall within these categories.

OPG's reasons for requesting confidential treatment are set out below for each of these categories. As mentioned above, the interrogatory responses and documents referenced below are provided in the confidential, unredacted versions filed in Attachment A.

a) References to Vendor/Contractor Performance

OPG seeks approval to redact information relating to vendor/contractor performance in various types of documents listed below in connection with the Darlington Refurbishment Program ("**DRP**") and the D2O Storage Project. Disclosing this information publicly could prejudice the competitive positions of the relevant parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. The confidential nature of this information was accepted by the OEB in EB-2020-0290 and EB-2016-0152.

i. Third Party or Internal Oversight Reports with respect to the DRP

Third party or internal oversight reports with respect to the DRP, containing confidential information, are being filed in: Ex. L-D2-02-AMPCO-137 (7 documents), Ex. L-D2-02-SEC-084 (13 documents), Ex. L-A1-02-SEC-011 (1 document), and Ex. L-D2-02-STAFF-105 (1 document). These include oversight reports from Modus/Burns & McDonnell, the Refurbishment Construction Review Board, and OPG Internal Audit.

ii. Attachments to Station Condition Reports related to the D2O Storage Project

Attachments to Station Condition Reports related to the D2O Storage Project, containing confidential information, are being filed in Ex. L-D2-02-AMPCO-079 (6 documents).

iii. Other Reports and Documentation Related to DRP and the D2O Storage Project

Other reports and documentation related to the DRP, containing confidential information, are being filed in: Ex. L-D2-02-AMPCO-115 (1 document), Ex. L-D2-02-SEC-073 (1 document), and Ex. L-D2-02-SEC-095 (1 document).

b) **Commercially Sensitive Information in Nuclear Business Case Summaries**

The nuclear business case summaries (the "**Nuclear BCSs**") for particular projects are being filed in: Ex. L-D2-01-AMPCO-027 (1 document), Ex. L-D2-01-AMPCO-059 (1 document, 1 Excel file), and Ex. L-D2-01-AMPCO-044 (1 document). An interrogatory response containing information relating to the Nuclear BCSs is being filed in Ex. L-D2-01-Staff-116.

The redacted portions of the Nuclear BCSs should be protected as confidential because this information includes OPG commercially sensitive information such as project cost contingencies, certain costs for contracted or purchased work or materials, or aggregate information that would allow for the determination of commercially sensitive information. Some of the Nuclear BCSs also include commentary on the performance of specific contractors. These aspects are of a nature that is similar to that which is described in (a), above. Disclosure of the redacted portions of the Nuclear BCSs that include OPG commercially sensitive information could prejudice OPG's competitive position and disclosure of the commentary on contractor performance could significantly interfere with OPG's negotiations and existing relationships in a variety of aspects of its business. Furthermore, similar information was treated as confidential by the OEB in this Application and also OPG's previous applications, EB-2016-0152, EB-2013-0321, and EB-2010-0008.

c) Pricing Information and Labour Rates in DRP Documents

Pricing information and labour rates for various aspects of the DRP are being filed in: Ex. L-D2-02-SEC-085 (1 document), Ex. L-D2-02-SEC-096 (1 document), Ex. L-D2-02-SEC-084 (1 document), and Ex. L-D2-01-AMPCO-072 (1 document). OPG seeks confidential treatment of such information for the following reasons:

i. Ex. L-D2-02-SEC-085, Attachment 1: The document filed in response to this interrogatory contains information relating to the budget of an external advisor and retainer amounts. Such information requires confidential treatment because the external advisor budget is commercially sensitive to OPG and not relevant to the DRP amounts requested in the application, and the retainer amounts are commercially sensitive to a third party.

ii. Ex. L-D2-02-SEC-096, Attachment 3, Ex. L-D2-02-SEC-084, Attachment 18, and Ex. L-D2-01-AMPCO-072, Attachment 1: The redacted portions of the documents filed in response to these interrogatories relate to labour rates and pricing information, which could be detrimental to OPG's and its counterparties' commercial interests. Additionally, this information is similar in nature to that which was the subject of confidential treatment in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence).

d) Collective Bargaining Documentation

A collective bargaining-related document is being filed in: Ex. L-A1-02-SEC-011 (1 document). Interrogatory responses containing information related to labour relations and collective bargaining are being filed in: Ex. L-F4-03-AMPCO-175, Ex. L-F4-03-PWU-024, Ex. L-F4-03-PWU-026, Ex. L-F4-01-PWU-029, Ex. L-F4-03-PWU-018, Ex. L-F4-03-PWU-031, Ex. L-F4-03-Staff-276, Ex. L-F4-03-Staff-282, Ex. L-F4-03-Staff-300, Ex. L-F4-03-Staff-304, Ex. L-F4-03-Staff-307, Ex. L-F4-03-Staff-309, Ex. L-F4-03-Staff-311, Ex. L-F3-02-Energy Probe-059 (page 2), Ex. L-F4-03-Energy Probe-063, Ex. F4-03-AMPCO-174, Ex. L-D3-01-Society-008, Ex. L-D3-01-Society-006, Ex. L-D3-01-Society-007, Ex. L-D3-01-Society-012, Ex. L-F4-03-Staff-306, Ex. L-D3-01-Society-005, Ex. F4-03-SEC-145, Ex. L-F4-03-SEC-149, Ex. L-F4-03-SEC-152, and Ex. L-F4-03-Energy Probe-064.

OPG is requesting that the above-referenced document and interrogatory responses be protected as confidential since they contain labour-sensitive information regarding the anticipated Pickering downsizing exercise and OPG's relocation to Clarington Corporate. The information for which OPG requests confidential treatment includes information indicative of the following: OPG's collective bargaining strategies, estimates of cost savings from pension and benefits reforms, planned declines in total regular employee headcount, planned share performance plan participation (which may be indicative of forecasted attrition), sick leave targets, retirement eligibility forecasts, estimated staff demand levels, forecasts and projections relating to total remuneration, salary and headcount, and relocation plans and costs related to Clarington Corporate Campus (including plans for vacating certain office leases). This information includes estimates and underpinning assumptions that are labour-sensitive because they depend on, and/or may influence, collective bargaining outcomes. Consequently, disclosure of such information could potentially interfere with future collective bargaining negotiations between OPG and the unions that represent its employees. The OEB granted confidential treatment for similar types of labour-sensitive information in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence) and in EB-2016-0152.

e) Tax Information

A document that contains tax information is being filed in: Ex. L-F4-02-Staff-272 (1 document). An interrogatory response containing information related to tax information is being filed in: Ex. L-F4-02-Staff-272.

OPG is requesting that the above-referenced document be protected as confidential in its entirety and that the above-referenced interrogatory response be partially protected using redactions. The tax information for which OPG requests confidential treatment relates to Income Tax Returns for 2014, 2015 and 2019 and contains information relating to OPG's unregulated businesses. As indicated in the Practice Direction, tax information is regularly afforded confidential treatment by the OEB. The OEB granted confidential treatment for this type of information in Procedural Order No. 1 of EB-2020-0290.

f) Combined Regulated and Unregulated Assets and Business of OPG Information

A document containing information reflecting the combined regulated and unregulated assets and business of OPG is being filed in: Ex. L-F4-03-AMPCO-176 (1 document). Interrogatory responses containing information relating to same are being filed in: Ex. L-C1-01-VECC-015, Ex. L-A2-02-CCC-012, and Ex. L-F4-03-Staff-276 (page 1).

This information should be protected as confidential because disclosure of this aggregated information (combined with information regarding the regulated business already disclosed) would allow for the disclosure of information related to OPG's unregulated business and facilities. The document filed in response to Ex. L-F4-03-AMPCO 176 contains aggregated information that could disclose amounts relating to the Earnings, OM&A Expenses, Production and Total In-service Capital for OPG's unregulated business. The response to Ex. L-C1-01-VECC-015 contains the proportion of total revenues generated from regulated assets which, if disclosed, could enable the calculation and disclosure of unregulated revenue amounts. The response to L-A2-02-CCC-012 contains information which may disclose annual budgets for Enterprise Operations, Enterprise Strategy and Enterprise Projects for OPG's unregulated business. The response to Ex. L-F4-03-Staff-276 (page 1) contains information which may disclose a forecast of retirements for the unregulated business. OPG consistently treats information relating to its unregulated business as confidential financial information and confidential commercially sensitive information. Similar requests for confidential treatment of such combined information were accepted by the OEB in this proceeding as well as EB-2016-0152 (Procedural Order No. 3), and EB-2013-0321 (Procedural Order No.4).

g) Heavy Water Sales Information

Documents that contain information that relate to OPG's sales and proceeds from its heavy water sales and processing are being filed in: Ex. L-A1-02-Staff-002 (1 document), Ex. L-H1-01-AMPCO-178 (1 document), and Ex. L-I1-01-SEC-159 (1 document). An interrogatory response containing information relating to OPG's sales and proceeds from its heavy water sales and processing is being filed in: Ex. L-G2-01-CCC-053.

OPG is requesting that the above-referenced documents and interrogatory response be partially protected as confidential because they contain information regarding OPG's sales of its heavy water sales and processing, which is an unregulated business activity. The document filed in response to Ex. L-A1-02-Staff-002, relates to OPG's sales and proceeds from its heavy water sales and processing, and its isotope sales business or aggregate information that would allow

determination of such information. The documents filed in response to Ex. L-H1-01-AMPCO-178 and Ex. L-I1-01-SEC-159 relate to margins on surplus heavy water sales as part of Nuclear revenues. The response to Ex. L-G2-01-CCC-053 provides a chart that details the forecast and actual amounts with respect to heavy water sales for the period 2017-2021 on sales of surplus heavy water, as part of Nuclear revenues.

OPG requests that this information be protected as confidential because its disclosure will prejudice OPG's competitive position and interfere significantly with any future negotiations being carried out by OPG. The confidential nature of this information was approved by the OEB in EB-2020-0152, EB-2016-0152, and EB-2013-0321.

h) Third Party Rates and Fees Information

Documents containing information relating to third party rates and fees are being filed in: Ex. L-F4-03-Staff-287 (1 document) and Ex. L-A1-02-CCC-001 (6 documents). An interrogatory response containing information relating to the same is being filed in: Ex. L-A1-02-CCC-001.

The redacted portions of the above-referenced documents and response should be protected as confidential because they contain commercially sensitive third-party information. Disclosure of such information could prejudice the economic interest and competitive position of the third parties. Similar information was treated as confidential by the OEB in OPG's previous applications, such as EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence), EB-2016-0152 (Procedural Order No. 3), and EB-2013-0321 (Procedural Order No. 4).

i) Clarington Corporate Campus Information

A document containing information relating to Clarington Corporate Campus is being filed in: Ex. L-A1-2-Staff-002 (1 document). Interrogatory responses containing information relating to the same are being filed in: Ex. L-D3-01-Staff-176, Ex. L-D3-01-Staff-177, Ex. L-D3-01-SEC-111 (pages 1 and 2), and Ex. L-D3-01-Society-009.

The redacted portions of the above-referenced responses contain commercially sensitive information regarding the total capital costs of the Clarington Corporate Campus project, as well as the composition of total project costs and project scope for the Clarington Corporation Campus. Since the project has not yet been tendered, disclosure of this information could prejudice OPG's competitive position and significantly interfere with its negotiations with prospective contractors and other third parties. This information is the same as or similar to the information set out in the Clarington Corporate Campus Planning Phase Business Case Summary, for which the OEB granted confidential treatment in this proceeding (Decision on Confidentiality – Pre-Filed Evidence).

j) Other

There are six documents containing confidential information that do not fit into one of the above categories. These documents are being filed in: Ex. L-F4-04-Staff-317 (1 document), Ex. L-F4-04-Staff-315 (1 document), Ex. L-F4-04-VECC-035 (1 document), Ex. L-D2-02-AMPCO-106 (1 document), Ex. L-A2-02-CCC-015 (1 document), Ex. L-A1-02-SEC-011, Attachment 2 (1 document). In addition, there are six interrogatory responses containing confidential information that do not fit into one of the above categories. These responses are being filed in: Ex. L-D3-01-Society-007, Ex. L-F3-02-Energy Probe-059 (page 1), Ex. L-F2-05-Staff-244, Ex. L-D2-01-Staff-120, Ex. L-D3-01-Society-012, and Ex. L-D3-01-SEC-111.

i. Ex. L-F4-04-Staff-317, Attachment 2 and L-F4-04-Staff-315, Attachment 1

The documents filed in response to these interrogatories provide breakdowns of "Other" centrally held costs for Nuclear and OPG. These documents have been redacted in their entirety. OPG sought confidential treatment for similar information requested in the interrogatories for EB-2013-0321 (Ex. L-6.10-AMPCO-71) and the OEB granted confidential treatment for such information under Procedural Order No. 8 of that application.

ii. Ex. L-D2-02-AMPCO-106, Attachment 1

The document filed in response to this interrogatory is a conceptual design report that contains operating experience relating to a heavy water storage project by Bruce Power. OPG seeks confidential treatment of this information as it is commercially sensitive to Bruce Power.

iii. Ex. L-F3-02-Energy Probe-059 (page 1)

OPG is requesting that page 1 of the interrogatory response be partially redacted as it contains information pertaining to the annual capital costs of the Clarington Campus for 2020-2026. The annual capital costs were also included in the Planning Phase Clarington Corporate Campus business case summary for which the OEB granted confidential treatment in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence).

As described in section (d) above (Collective Bargaining Documentation), OPG is also requesting confidential treatment of certain labour-sensitive information contained on page 2 of this interrogatory response.

iv. Ex. L-F2-05-Staff-244

This interrogatory response contains information summarizing the annual value of adjustment for cost (or benefit) sharing between 2012-2021, and therefore impacts the pricing of OPG's uranium conversion services. OPG requests that this information be protected as confidential as its disclosure will prejudice OPG's competitive position and significantly interfere with any future negotiations. Other similar pricing information was treated as confidential by the OEB in this proceeding and also OPG's previous applications, EB-2016-0152, EB-2013-0321, and EB-2010-0008.

v. Ex. L-D2-01-Staff-120

This interrogatory response contains commercially sensitive information related to an open procurement process. OPG requests that this information be protected as confidential as its disclosure will prejudice OPG's competitive position and significantly interfere with future negotiations with prospective vendors and other third parties. The confidential nature of this information was approved by the OEB in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence).

vi. Ex. L-D3-01-Society-007

This interrogatory response contains commercially sensitive information regarding the potential sale of an asset of OPG's unregulated business, including the planned timing of such potential sale. OPG requests that this information be protected as confidential. This information in relation

to an unregulated asset is not relevant to OPG's rate application. In addition, the asset has yet to be offered for sale, and therefore, disclosure of this information may prejudice OPG's competitive position and significantly interfere with future negotiations with prospective purchasers and other third parties. OPG also considers this information to be labour-sensitive, as further described in the Collective Bargaining Documentation section above.

vii. Ex. L-D3-01-Society-012 and Ex. L-D3-01-SEC-111 (page 3)

These interrogatory responses contain commercially sensitive information related to the expected date of termination for certain office leases as well as OPG's forecasts of annual savings for leases expiring prior to 2026. OPG requests that this information be protected as confidential as its disclosure may significantly interfere with any future landlord-tenant lease negotiations. OPG also considers the information redacted in Ex. L-D3-01-Society-012 to be labour-sensitive, as further described in section (d) (Collective Bargaining Documentation), above.

viii. Ex. L-F4-04-VECC-035, Attachment 1

The document filed in response to Ex. L-F4-04-VECC-035 contains information regarding OPG's insurance policies, including expected increases in insurance costs that is commercially sensitive information and has been redacted in its entirety. OPG requests confidential treatment of this information as it would significantly interfere with negotiations related to OPG's upcoming policy renewal(s) if insurers were to have access to such information.

ix. Ex. L-A2-02-CCC-015, Attachment 1

The document filed in response to Ex. L-A2-02-CCC-015 contains information that reflects the combined regulated and unregulated assets and business of OPG. This information should be protected as confidential because disclosure of this aggregated information (combined with information regarding the regulated business already disclosed) would allow for the disclosure of information related to the unregulated business and facilities. OPG consistently treats information relating to its unregulated business as confidential financial information and confidential commercially sensitive information. Similar requests for confidential treatment of such combined information were accepted by the OEB in EB-2020-0290, EB-2016-0152 and EB-2013-0321.

x. Ex. L-A1-02-SEC-011, Attachment 2

The document filed in response to Ex. L-A1-02-SEC-011 contains internal audit findings related to OPG's cyber-security systems and the security of OPG's certain facilities. This information should be protected as confidential because disclosure of this information could pose a potential threat to OPG's cyber-security systems and the security of OPG's facilities.

As mentioned above, the foregoing materials are provided in the confidential, unredacted versions filed in Attachment A.

Should the OEB require any further information or clarification as to the requests made herein, please contact the Applicant's legal counsel as required.

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

APPENDIX 'A'

List of Affected Interrogatory Responses and Documents

1. **Affected Interrogatory Responses**

#	Exhibit
1.	L-C1-01-VECC-015
2.	L-A1-02-CCC-001
3.	L-D2-01-STAFF-116
4.	L-D2-01-STAFF-120
5.	L-G2-01-CCC-053
6.	L-A2-02-CCC-012
7.	L-F2-05-STAFF-244
8.	L-D3-01-SEC-111
9.	L-D3-01-SOCIETY-005
10.	L-D3-01-SOCIETY-006
11.	L-D3-01-SOCIETY-007
12.	L-D3-01-SOCIETY-008
13.	L-D3-01-SOCIETY-009
14.	L-D3-01-SOCIETY-012
15.	L-D3-01-STAFF-176
16.	L-D3-01-STAFF-177
17.	L-F3-02-ENERGY PROBE-059
18.	L-F4-01-PWU-029
19.	L-F4-02-STAFF-272
20.	L-F4-03-AMPCO-174
21.	L-F4-03-AMPCO-175
22.	L-F4-03-ENERGY PROBE-063
23.	L-F4-03-ENERGY PROBE-064
24.	L-F4-03-PWU-018
25.	L-F4-03-PWU-024

26.	L-F4-03-PWU-026
27.	L-F4-03-PWU-031
28.	L-F4-03-SEC-145
29.	L-F4-03-SEC-149
30.	L-F4-03-SEC-152
31.	L-F4-03-STAFF-276
32.	L-F4-03-STAFF-282
33.	L-F4-03-STAFF-300
34.	L-F4-03-STAFF-304
35.	L-F4-03-STAFF-306
36.	L-F4-03-STAFF-307
37.	L-F4-03-STAFF-309
38.	L-F4-03-STAFF-311

2. Affected Documents Attached to Interrogatory Responses

#	Exhibit	Attachment #
39.	L-H1-01-AMPCO-178	Attachment 1
40.	L-I1-01-SEC-159	Attachment 1
41.	L-A1-02-SEC-011	Attachment 1
42.	L-A1-02-SEC-011	Attachment 2
43.	L-A1-02-STAFF-002	Attachment 1
44.	L-A1-02-CCC-001	Attachment 1
45.	L-A1-02-CCC-001	Attachment 2
46.	L-A1-02-CCC-001	Attachment 6
47.	L-A1-02-CCC-001	Attachment 8
48.	L-A1-02-CCC-001	Attachment 9
49.	L-A1-02-CCC-001	Attachment 10
50.	L-A2-02-CCC-015	Attachment 1
51.	L-D2-01-AMPCO-072	Attachment 1
52.	L-D2-01-AMPCO-027	Attachment 1
53.	L-D2-01-AMPCO-059	Attachment 1
54.	L-D2-01-AMPCO-044	Attachment 1
55.	L-D2-02-AMPCO-137	Attachment 132
56.	L-D2-02-AMPCO-137	Attachment 133
57.	L-D2-02-AMPCO-137	Attachment 134
58.	L-D2-02-AMPCO-137	Attachment 135
59.	L-D2-02-AMPCO-137	Attachment 136
60.	L-D2-02-AMPCO-137	Attachment 137
61.	L-D2-02-AMPCO-137	Attachment 138
62.	L-D2-02-SEC-073	Attachment 1
63.	L-D2-02-SEC-084	Attachment 1
64.	L-D2-02-SEC-084	Attachment 2
65.	L-D2-02-SEC-084	Attachment 3

66.	L-D2-02-SEC-084	Attachment 4
67.	L-D2-02-SEC-084	Attachment 5
68.	L-D2-02-SEC-084	Attachment 6
69.	L-D2-02-SEC-084	Attachment 7
70.	L-D2-02-SEC-084	Attachment 8
71.	L-D2-02-SEC-084	Attachment 9
72.	L-D2-02-SEC-084	Attachment 10
73.	L-D2-02-SEC-084	Attachment 12
74.	L-D2-02-SEC-084	Attachment 13
75.	L-D2-02-SEC-084	Attachment 14
76.	L-D2-02-SEC-084	Attachment 18
77.	L-D2-02-STAFF-105	Attachment 2
78.	L-D2-02-SEC-085	Attachment 1
79.	L-D2-02-SEC-095	Attachment 1
80.	L-D2-02-SEC-096	Attachment 3
81.	L-D2-02-AMPCO-079	Attachment 2
82.	L-D2-02-AMPCO-079	Attachment 4
83.	L-D2-02-AMPCO-079	Attachment 34
84.	L-D2-02-AMPCO-079	Attachment 40
85.	L-D2-02-AMPCO-079	Attachment 41
86.	L-D2-02-AMPCO-079	Attachment 42
87.	L-D2-02-AMPCO-115	Attachment 1
88.	L-D2-02-AMPCO-106	Attachment 1
89.	L-F4-02-STAFF-272	Attachment 1
90.	L-F4-03-AMPCO-176	Attachment 6
91.	L-F4-03-STAFF-287	Attachment 1
92.	L-F4-04-STAFF-317	Attachment 2
93.	L-F4-04-STAFF-315	Attachment 1
94.	L-F4-04-VECC-035	Attachment 1

95.	L-D2-02-SEC-084	Attachment 22
96.	L-D2-02-SEC-105	Attachment 1
97.	L-F2-03-AMPCO-151	Attachment 1
98.	L-G2-01-SEC-153	Attachment 1

3. Other Affected Files in Interrogatory Responses

#	Exhibit	File
99.	L-D2-01-AMPCO-059	Excel file titled “OPG Excel Requested Tables (Confidential)”