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 30th, 2021

Dear Ms. Long:

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

OPG is filing the remainder of its interrogatory responses, five revisions to interrogatory responses following from the Interrogatories Refusals Discussion meeting, and also making several amendments to its evidence, as set out below.

***Interrogatory Responses***

Further to OPG's submissions on April 19th, April 26th, and April 28th, OPG is filing 5 additional interrogatory responses (Ex. L-F4-03-Staff-275, Ex. L-F4-03-Society-018, Ex. L-F4-03-SEC-146, Ex. L-F4-03-AMPCO-171, and Ex. L-F4-03-AMPCO-169). OPG has submitted these document through the Regulatory Electronic Submissions System. These materials will also be made available on OPG's website at www.opg.com. All interrogatory responses have been filed.

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.

***Confidential Information for the OEB's Review Only***

In response to the OEB's Decision on Confidentiality – Permanent Redactions, dated April 15, 2021, OPG has submitted a letter on Confidential Information for the OEB's Review Only, including additional supporting rationale for the permanent redactions OPG seeks to retain.

***Corrections to Interrogatory Responses***

| Exhibit | Description of Change |
|---|---|
| L-A1-03-Staff-008 | • Chart 1: Actual ROE for 2017-2019 revised consistent with the response to Ex. L-I1-01-SEC-159. Actual ROE for 2020 is also provided, and periods for Average ROE have been adjusted to include 2020. |

***Updates from Refusals Discussion Meeting***

OPG agreed to revise certain interrogatory responses following the Interrogatories Refusals Discussion Meeting on April 23, 2021. These revisions were also set out in OPG's letter dated April 26, 2021. Below are five such revisions. The remainder require more time to prepare, which OPG will file as they are completed.

| Exhibit | Description of Change |
|---|---|
| L-F4-03-Staff-294 | • Pages 3-4: The interrogatory response has been revised to fulfil the request of OEB Staff and SEC for clarification from Willis Towers Watson as to the timing and level of effort that would be required to provide a response to this interrogatory. |
| L-F4-03-Staff-285 | • Page 3, lines 8-30: Part e) of this interrogatory response has been revised to provide an update to both OEB Staff's and SEC's requests at the Interrogatories Refusals Discussion Meeting. |
| L-F4-03-SEC-148 | • Pages 2-3: The interrogatory response has been revised to fulfil the request of OEB Staff and SEC for clarification from Willis Towers Watson as to the timing and level of effort that would be required to provide a response to this interrogatory. |
| L-A2-02-CCC-015 | • Page 1: The interrogatory response has been revised to provide the requested document. |
| L-A1-02-SEC-011 | • Page 1: The interrogatory response has been revised to fulfil the request of SEC and CME to a) add 2016 Q4 audits to the list of audits, and b) provide a summary of a selected list of audits. |

***Corrections to Pre-filed Evidence***

| Exhibit | Description of Change |
|---|---|
| Ex. I1-1-1 | • Chart 1: Actual ROE for 2017-2020 revised consistent with the response to Ex. L-I1-01-SEC-159. |

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