ONTARIO POWER GENERATION INC. 2022 – 2026 PAYMENT AMOUNTS EB-2020-0290

UNDERTAKING (J)

Undertaking	Date	DESCRIPTION	Response Date
JT1.1	3/5	TO ADVISE THE CURRENT NUMBER TO COMPARE TO 5.623	
JT1.2		TO MAKE BEST EFFORTS TO RESTATE CHART 6 AT EXHIBIT D2-2-7, PAGE 17 SHOWING THE FORECAST FUEL-HANDLING COSTS FOR UNITS 1 AND 4	
JT1.3		TO PROVIDE THE INPUTS TO THE CALCULATION FOR THE LUEC ESTIMATE, COMPARING THE 8.1 CENTS PER KILOWATT HOUR TO THE 8.36 CENTS PER KILOWATT HOUR BROKEN OUT BETWEEN THE TWO COMPONENTS, WHICH IS DARLINGTON REFURB AND THEN POST-REFURBISHMENT OPERATIONS.	
JT1.4		TO PROVIDE AN UPDATE TO THE 2012 RISK REGISTER	
JT1.5		TO CONFIRM FILING OF ATTACHMENT 1 OF INTERROGATORY RESPONSE D2-02-AMPCO- 87A	
JT1.6		TO PROVIDE OVERTIME COSTS FOR OPG AND EACH CONTRACTOR BY YEAR FOR THE PROJTECT, AS WELL AS TOTAL LABOUR COSTS FOR OPG AND EACH CONTRACTOR BY YEAR FOR THE DURATION OF THE PROJECT.	
		TO LOOK AT WHEN THESE SCOPE	
JT1.7		REDUCTIONS OCCURRED AND WHAT WAS THE RESULTING REDUCTION IN COST ESTIMATE.	

Undertaking	<u>Date</u>	DESCRIPTION	Response Date
JT1.8		TO PROVIDE THE ATTACHMENT TO THE AMPCO 96 INTERROGATORY.	
JT1.9		TO PROVIDE SCOPES OF WORK RELATED TO THIS FACILITY AND REVISIONS OF THOSE SCOPES OF WORK.	
JT1.10		TO QUANTIFY THE APPROXIMATE 8 PERCENT LOSS OF PRODUCTION ON AN ANNUAL BASIS DUE TO FEED SHORTAGES.	
JT1.11		TO ANSWER THE STAFF INTERROGATORIES.	
JT1.12		TO FILL IN BLANKS IN CHART IN KT1.1 ON A BEST EFFORTS BASIS, AND TO INCLUDE OTHER MATERIAL ESTIMATES IN THE EVIDENCE OR KNOWN TO OPG	
JT1.13		TO MAP THE BUSINESS CASE SUMMARY OF ESTIMATE TABLES TO CHART 1 IN THE PREFILED EVIDENCE CATEGORIES FOR THE FIVE BCS	
JT1.14		TO EXPLAIN THE VARIANCES FROM THE LAST BCS TO THE FINAL COST	
JT1.15		TO TAKE THE ONE YEAR ONLINE DEFICIENT CRITICAL BACKLOG AND THE ONE YEAR ONLINE CORRECTIVE CRITICAL BACKLOG FOR 2014 AND 2019 AND PUT THEM IN A TABLE.	
JT1.16		TO CONFIRM THE NUMBER OF PEERS IN THE MEDIAN	
JT1.17		TO DESCRIBE THE NATURE OF THE CRITICAL BACKLOGS AND WHETHER THEY'RE MORE SAFETY- OR RELIABILITY-RELATED.	
JT1.18		TO ADVISE WHETHER IT'S POSSIBLE TO CALCULATE THE PICKERING PLANT LEVEL	

Undertaking	Date	DESCRIPTION	<u>Response</u> Date
		CAPABILITY FACTOR, ACCOUNTING ONLY FOR THE TOP 10 PEAK ELECTRICITY DEMAND HOURS OVER THE PERIOD COVERED BY THE BENCHMARKING STUDY	
JT1.19		TO EXPLAIN WHAT LTC IS REQUIRED AS REFERENCED ON F2, TAB 8, SCHEDULE 1, PAGE 5.	
JT1.20		TO CONFIRM WHETHER OPG NEEDS THE LICENCE TO MAINTAIN AN OPTION TO BUILD NEW NUCLEAR, AND FOR WHAT PERIOD OF TIME.	
JT1.21		TO PROVIDE THE COMBINED 2020-2021 AS WELL AS IN THE 2022 TO 2026 IMPACT ON DARLINGTON AND PICKERING AS A RESULT OF COVID-19, SO THE TERAWATT IN EACH OF THOSE YEARS, AS WELL AS THE REVENUE IMPACT IN EACH OF THOSE YEARS. SO ACTUAL AND FORECAST BASED ON YOUR PAYMENT AMOUNTS YOU'RE SEEKING FROM 2022 TO 2026.	
JT1.22		TO PROVIDE THE ANNUAL TARGETS, IN- SERVICE ADDITIONS, CAPITAL ADDITION TARGETS, OM&A SPEND TARGETS, AND TO LINK BOTH THE TARGET AND THE ANNUAL FORECAST TO THE APPLICATION AND WHERE THESE NUMBERS ARE COMING FROM.	
JT1.23		WITH RESPECT TO, FOR THE ANNUAL IN- SERVICE TARGET, THE ANNUAL CAPITAL SPEND TARGET, AND THE ANNUAL OM&A SPEND TARGET, TO RELATE THESE TO WHERE IN THE EVIDENCE THOSE NUMBERS ARE DERIVED FROM.	
JT1.24		TO SHOW THE DERIVATION OF THE VALUE- FOR-MONEY METRICS FOR 2022 CAPITAL COSTS PER MEGAWATT-HOUR AT DARLINGTON AND PICKERING	

Undertaking	Date	DESCRIPTION	<u>Response</u> Date
JT1.25		TO COMPLETE EXHIBIT NO. KT1.2	
JT1.26		TO PROVIDE THE SPECIFIC RANKINGS.	
JT1.27		TO CONFIRM ALL THE NUMBERS IN THE DOCUMENT TITLED "OPG PANEL 2 METRIC STAFF SUMMARY."	
JT1.28		TO ASK SCOTT MADDEN TO RESPOND TO THE QUESTIONS IN THE DOCUMENT TITLED TECHNICAL CONFERENCE QUESTIONS FOR SCOTT MADDEN.	
JT1.29		TO PROVIDE DATA ON STAFFING DIFFERENCES WHEN ALL FOUR UNITS WERE ONLINE BEFORE THE REFURBISHMENT STARTED, VERSUS HOW MANY WERE WORKING ON STEADY-STATE OPERATIONS WHILE ONE OF THE UNITS WAS OFFLINE	
		DAY 2 – MAY 6, 2021	
JT2.1		TO CONFIRM THAT THE DATA IN THE STAFF 113 IS ACCURATE AND PROVIDE ANY CORRECTIONS AS REQUIRED.	
JT2.2		TO PROVIDE A BREAKDOWN OF THE PROJECT MANAGEMENT COMMENTS AND TWO OF THE LINE ITEMS FOR THE PICKERING ENABLING BUDGET, PROGRAM MANAGEMENT AND LICENSING AND IIP ACTIONS.	
JT2.3		TO SEE WHY THE COSTS OF THE PICKERING 58 DIGITAL CONTROL COMPUTER HARDWARE MODERNIZATION PROJECT AND THE UPGRADED PLANT A TOWER PROJECT ARE BEING RECOVERED IN PROJECT OM&A AS OPPOSED TO BEING FUNDED THROUGH OPG'S DECOMMISSIONING NUCLEAR LIABILITY FUNDING.	

Undertaking	Date	DESCRIPTION	<u>Response</u> Date
JT2.4		TO IDENTIFY LABOUR THAT WAS ALLOCATED AND CHARGED TO EXCEPTIONS TO PLANNED OUTAGES, ON A BEST-EFFORTS BASIS.	
JT2.5		TO PROVIDE A BREAKDOWN OF FORECAST AND HISTORICAL SPENDING FROM '16 TO 2026 FOR EACH THE FOUR TYPES OF OUTAGES, REGULAR PLANNED OUTAGES, NON-REFURBISHMENT OUTAGES, WHICH IS ALSO CALLED CYCLICAL OUTAGE, POST- REFURBISHMENT OUTAGE AND VACUUM BUILDING OUTAGE.	
JT2.6		TO PROVIDE AN ESTIMATED BUDGET FOR THE POST-REFURBISHMENT OUTAGE OF UNIT 2.	
JT.2.7		TO EXPLAIN HOW MUCH OF THE 13.2- MILLION-DOLLAR VARIANCE IS DRIVEN BY UNFILLED VACANCIES.	
JT2.8		TO PROVIDE THE PREPARATION OF THE OPERATIONS AND THE PROJECT SUPPORT FUNCTION OF BASE OM&A ON A MONTHLY BASIS FOR 2022.	
JT2.9		TO PROVIDE A BREAKDOWN OF OPERATION AND THE PROJECT SUPPORT COSTS IN BASE OM&A BY RESOURCE TIME FOR HISTORICAL AS WELL AS FORECAST FOR 2016 TO 2026 TO MATCH WHAT WE HAVE IN EVIDENCE.	
JT2.10		FOR THE PROJECTS REFERRED TO IN A2-02- AMPCO-008: (A) TO ADVISE WHEN PRI WILL BE COMPLETED; (B) TO PROVIDE THE DATES THAT THE THREE REMAINING PROJECTS WERE EXPECTED TO HAVE A COMPREHENSIVE PIR COMPLETED, TO INDICATE WHY THEY HAVEN'T BEEN COMPLETED, AND WHEN YOU EXPECT TO HAVE THEM COMPLETED.	
JT2.11		FOR THE COMPLETED PROJECTS PROVIDE A	

Undertaking	Date	DESCRIPTION	Response Date
		TABLE THAT SHOWS THE DATE THE PIRS WERE TO BE COMPLETED, THE STATUS, AND THEN PROVIDE ANY COPIES OF COMPLETED PIRS.	
JT2.12		TO LOOK FOR THE AISC TERM OF REFERENCE AND PROVIDE IT.	
JT2.13		TO ADVISE ON A BEST-EFFORTS BASIS WHAT ARE THE CPI AND SPI VALUES FOR THE P&M PROJECT AT YEAR END EVERY YEAR, FROM 2018 TO 2020.	
JT2.14		TO PROVIDE SPI AND CPI VALUES FOR 2017; TO PROVIDE ANY REPORT THAT WAS ISSUED AT THE END OF THE YEAR TO DISCUSS THE RESULTS.	
JT2.15		WITH REFERENCE TO THE TOTAL NUCLEAR PORTFOLIO COSTS BROKEN OUT BETWEEN CAPITAL AND OM&A FOR 2016-2021 IN D2-01- AMPCO-013, ATTACHMENT 1, TO ADVISE WHETHER THESE THE AMOUNTS THAT OPG MANAGED TO, OR WHETHER THERE WERE DIFFERENT OM&A TARGETS AS A RESULT OF ANNUAL BUSINESS PLANNING EFFORTS.	
JT2.16		TO PROVIDE A TABLE WITH ALL 130 MOTORS, THE EQUIPMENT CODE, THE CRITICALITY CODE, AND A DEFINITION OF WHAT CRITICALITY CODES ARE USED FOR EACH OF THE MOTORS.	
JT2.17		TO PROVIDE AN UPDATED VERSION OF THE TABLE IN D2-01-AMPCO-072, ATTACHMENT A	
JT2.18		TO ADVISE THE STORAGE CAPACITY OF THE PGS RESERVOIR	
JT2.19		TO IDENTIFY INSTANCES WHEN THE PGS RESERVOIR WAS COMPLETELY FULL, AND THAT WAS THE ONLY REASON WHY OPG COULD NOT PUMP ANY MORE INTO IT FOR	

Undertaking	Date	DESCRIPTION	Response Date
		2019.	
JT2.20		TO CONFIRM WHETHER THE FREQUENCY OF THE DECISION TO RUN THE PUMP IS HOURLY, OR NOT, OR TO PROVIDE MORE SPECIFIC INFORMATION.	
JT2.21		TO PROVIDE A TABLE OF THE SBG EVENTS ON AN HOURLY BASIS FOR WHICH OPG IS SEEKING AN SBG AMOUNT; AND FOR EACH OF THOSE HOURS, INDICATING WHETHER THE PGS PUMP WAS RUNNING OR NOT.	
JT2.22		WITH REFERENCE TO JT2.21, TO CONSIDER THE REASON, IF KNOWN AND IDENTIFIABLE, WHY THE PUMP WASN'T PUMPING	
JT2.23		TO ADVISE WHETHER OPG HAS A FINANCIAL INCENTIVE TO SPILL ITS REGULATED HYDRO FACILITIES BEFORE IT SPILLS ITS UNREGULATED HYDRO FACILITIES	
JT2.24		TO PROVIDE THE DRIVERS FOR THE DECLINE IN THE PGS, INCLUDING WATER LEVELS AND WHAT THE OTHER DRIVERS ARE, AND EXPLAINING AS BEST AS POSSIBLE THE PERCENTAGE THAT EACH OF THEM CAUSES FOR THE DECLINE.	
JT2.25		TO ADVISE FOR HOW MANY HOURS IS OPG SEEKING SBG RECOVERY DID IT HAVE A HYDRO FACILITY THAT WAS CURRENTLY GENERATING AND HAD AVAILABLE STORAGE SPACE THAT WOULD HAVE ALLOWED THAT FACILITY TO STOP GENERATING WITHOUT SPILLING	
JT2.26		TO PROVIDE THE NAME OF THE ECONOMIC ANALYSIS TOOL OPG USES TO DETERMIND WHEN TO UTILIZE THE PGS OR NOT	
JT2.27		TO PROVIDE THE WEIGHTED AVERAGE DEPRECIATION RATE ON THE IN-SERVICE	

Undertaking	Date	DESCRIPTION	<u>Response</u> Date
		ADDITIONS FROM 2017 TO 2019, SPECIFICALLY FOR THE NUCLEAR OPERATIONS CAPITAL CATEGORIES, THE DARLINGTON NGS, THE PICKERING NGS, AND THE OPERATIONS AND PROJECT SUPPORT	
JT2.28		TO INVESTIGATE AND PROVIDE, AS POSSIBLE, DOCUMENTS BASED ON THE BUSINESS PLAN RELATED TO THE NEW REAL-ESTATE STRATEGY THAT THIS IS PART OF.	
JT2.29		TO CONFIRM WHETHER OPG HAS TO MAKE A DECISION ON ANY LEASES BEFORE THE EXECUTION BUSINESS CASE IS DECIDED UPON	
JT2.30		TO PROVIDE THE LIVE EXCEL SPREADSHEETS USED FOR THE NPV CALCULATIONS	
JT2.31		WITH RESPECT TO THE TOTAL OR THE ANNUAL ASSET SERVICE FEES THAT OPG IS SEEKING FOR '22 TO '26, TO STATE WHAT THOSE NUMBERS WOULD BE IF THE BOARD DID NOT AGREE WITH ITS PROPOSED CHANGES TO THE CAPITAL STRUCTURE.	
JT2.32		TO DO TABLE 1, THE ASF CALCULATION, INCLUDING THE CCA SIMPLIFIED ASSUMPTION FOR THE CLARINGTON PROJECT.	
JT2.33		TO PROVIDE A SINGLE IR SHOWING SAVINGS 2022 TO 2028, SHOWING ON AN ANNUAL BASIS THE DIFFERENT LINE ITEMS SO WE CAN SEE WHERE THE NUMBERS DROP OFF FOR THE VARIOUS LINE ITEMS OVER TIME.	
JT2.34		TO ADVISE IN WHICH PROCEEDING OR AT WHAT TIME THE BOARD WILL DETERMINE NOT JUST THE DISPOSITION, NECESSARILY, BUT THE POLICY ABOUT DISPOSITION, AND IF	

<u>Undertaking</u>	Date	DESCRIPTION	Response Date
		IT IS IN THIS PROCEEDING WHAT IS YOUR PROPOSAL.	
JT2.35		TO ADVISE WHY THE APPROACH WAS TO ENSURE THAT THERE WAS 50-50 IN ABSOLUTE NUMBER OF COMPARATORS VERSUS JUST WEIGHTING HOW MANY OTHER PRIVATE RELEVANT PRIVATE- SECTOR COMPANIES AND WEIGHTING THE 50 PERCENT OF WHATEVER NUMBER OF PUBLIC-SECTOR COMPANIES.	
JT2.36		TO PROVIDE FOR EACH YEAR THE DEPRECIATION ON THE IN-SERVICE ADDITIONS FOR THAT YEAR.	
JT2.37		TO IDENTIFY ANY IMPACTS LISTED IN CCC 13, TABLE 1 THAT WILL HAVE AN OFFSETTING OR PARTIALLY OFFSETTING IMPACT IN 2022 OR BEYOND.	
JT2.38		TO PROVIDE OPG'S POSITION ON WHAT SHOULD HAPPEN IF IT CEASES TO BE ALLOWED TO USE US GAAP DURING THE IRM PERIOD	
JT2.39		TO CLARIFY WHETHER UNIT 2 WAS FULLY DEPRECIATED AND/OR STILL IN RATE BASE WHILE IT WAS NOT IN SERVICE	
		DAY 3 – MAY 7, 2021	
JT3.1		TO ADVISE WHY THE OEB ROE FORMULA IS RELEVANT TO EQUITY THICKNESS.	
JT3.2		TO EXPLAIN HOW THE STANDARD & POOR'S REPORT, AND PARTICULARLY THE TABLE ON PAGE 2, DEMONSTRATES THAT INVESTORS CONSIDER DIFFERENCES IN REGULATORY RISK BETWEEN CANADA AND THE U.S. AS MINIMAL.	
JT3.3		TO HAVE CONCENTRIC ANSWER WHETHER	

Undertaking	Date	DESCRIPTION	Response Date
		THEY HAVE CONCLUDED FROM THEIR REPORT AND FROM THIS ANSWER THAT GROUP 2 ACCOUNTS ARE INHERENTLY RISKIER THAN GROUP 1 ACCOUNTS.	
JT3.4		TO ADVISE WHETHER OPG IS PROPOSING TO USE THE 2013 COST OF CAPITAL AND EQUITY THICKNESS FIGURES IN THE UPCOMING IRM PERIOD FOR HYDROELECTRIC ONLY.	
JT3.5		TO PROVIDE FURTHER DETAIL TO THE INFORMATION IN STAFF 18 RELATED TO COVID IMPACTS	
JT3.6		TO PROVIDE UPDATED CHARTS IN SEC 32 WITH DATA RE-STATED TO THREE DECIMAL PLACES	
JT3.7		TO ADVISE WHETHER THE \$12.4 MILLION OF CYCLICAL OUTAGE COSTS WERE INCLUDED IN OPG'S PAYMENT AMOUNTS DURING LAST CUSTOM IR TERM.	
JT3.8		TO POINT TO THE COST-BENEFIT ANALYSIS WITH RESPECT TO THE WIFI POWERHOUSE.	
JT3.9		TO IDENTIFY A POINT IN TIME WHEN THE NEW TALENT SEGMENTATION STRUCTURE CAME INTO EFFECT AND PROVIDE THE NUMBER OF MONTHLY MANAGEMENT VACANCIES AND THE PERCENTAGE OF MANAGEMENT VACANCIES BEFORE AND AFTER THAT CHANGE.	
JT3.10		TO HAVE WTW RESPOND IF POSSIBLE TO THE QUESTIONS PROVIDED IN THE DOCUMENT ENTITLED "TECHNICAL CONFERENCE QUESTIONS FOR WTW"	
JT3.11		TO REQUEST THAT THE IESO FILE A LETTER ABOUT HOW IT IS GOING TO INCENT OPG TO PARTICIPATE IN A DAY AHEAD MARKET.	

<u>Undertaking</u>	Date	DESCRIPTION	<u>Response</u> Date
JT3.12		TO PROVIDE RETROSPECTIVE INFORMATION ATTRIBUTED TO THE REGULATED BUSINESS FOR KIPLING AND WESLEYVILLE, SEPARATELY, SHOWING DOLLAR AMOUNTS AND PERCENTAGES	
JT3.13		TO ADVISE THE COSTS PREVIOUSLY INCLUDED PREVIOUSLY IN THE NUCLEAR DEVELOPMENT VARIANCE ACCOUNT	
JT3.14		TO CONFIRM THAT IF THE DEFERRED TAX METHOD WERE TO BE APPLIED TO THE PRESCRIBED FACILITIES WHETHER THE OUTCOME WOULD BE THE SAME AS FOR THE BRUCE FACILITIES.	
JT3.15		TO PROVIDE THE EVIDENTIARY REFERENCE FOR LIFE-TO-DATE CONTRIBUTIONS OPG HAS MADE TO THE FUND, WITH THE AMOUNT OF CONTRIBUTIONS AND THE FUNDED STATUS OF THE FUND	
JT3.16		TO RECONCILE THE DIFFERENCES BETWEEN C2-01-STAFF-086, TABLE 5, AND C2-01-CCC- 029, TO CLARIFY FIGURES FOR PRE-TAX REVENUE REQUIREMENT AND AFTER-TAX AMOUNTS.	
JT3.17		TO PROVIDE THE UPDATED, DETAILED ROLES OF THE BALANCES UNDERPINNING STAFF 271 AND 337.	
JT3.18		TO CLARIFY THE FIGURES FOR THE COST OF CAPITAL FOR NON-ARC RATE BASE IN STAFF 271, ATTACHMENT 2, TABLE 2, LINE 5 AND NOTE 5	
JT3.19		TO PROVIDE THE DEBT AMOUNT USED FOR EACH YEAR OVER THE IR TERM FOR SCENARIO E, WHICH IS THE OPG PROPOSED SCENARIO FOR RATE SMOOTHING.	
JT3.20		TO SPECIFY WHICH YEAR OR YEARS AS YOU	

Undertaking	Date	DESCRIPTION	<u>Response</u> Date
		MENTIONED OVER THE IR TERM EACH SCENARIO RESULTS IN THE LOWEST VALUE YOU'RE SHOWING, FOR ALL SCENARIOS A TO I	
JT3.21		TO PASS ON MR. POLLOCK'S QUESTIONS TO THE EXPERTS.	
JT3.22		TO EXPLAIN HOW THE PMOC IS ABLE TO OVERSEE PROJECTS, HOW OPG RECORDS LESSONS LEARNED, AND WHAT SORT OF CORRECTIVE ACTIONS THEY TAKE TO PREVENT RECURRENCE.	
JT3.23		TO PROVIDE AN ANALYSIS THAT DESCRIBES WHAT WOULD BE THE CASH AMOUNT EMBEDDED WITHIN TABLE 1 OF EXHIBIT C2, ATTACHMENT, 1.	
		DAY 4 – MAY 10, 2021	
		DAT 4 - MAT 10, 2021	
JT4.1		FOR THE PERIOD OF 2014 TO 2020, TO PROVIDE A PERCENTAGE OF TOTAL ENERGY OFFERED BELOW GRC BY MONTH	
JTT4.2		TO SUPPLEMENT THE RESPONSE TO D3-01- SOCIETY-6A TO INCLUDE KIPLING AND NIAGARA SPACE IMPACT INFORMATION	
JT4.3		TO CONFIRM WHETHER AND HOW THE SOCIETY ETES WERE CAPTURED IN THE ANALYSIS THAT WTW DID IN SEC 149	
JT4.4		TO PROVIDE THE CONCEPTUAL DESIGN OR LAYOUT OF THE CLARINGTON BUILDING.	
JT4.5		TO PROVIDE THE PERFORMANCE METRIC RESULTS FOR THE YEARS 2016 TO 2020 AND THE TARGET FOR 2021.	
JT4.6		TO PROVIDE THE SPLIT ACROSS THESE FOUR CATEGORIES AND ANY OTHER CATEGORIES, TO THE EXTENT THEY ARE	

Undertaking	Date	DESCRIPTION	<u>Response</u> Date
		MATERIAL.	
JT4.7		TO PROVIDE A LIVE EXCEL VERSION OF THE TABLE AT F4-03-AMPCO-167, ATTACHMENT 1.	
JT4.8		TO PROVIDE THE SPLITS OF COMPENSATION COSTS REQUESTED IN PARTS C AND D OF F4-03-AMPCO-169 FOR ALL STAFF CATEGORIES, NOT JUST EXECUTIVE, INCLUDING AN EXCEL VERSION.	
JT4.9		TO RE-FILE A RESPONSE TO F4-03-AMPCO- 172	
JT4.10		WITH REFERENCE TO THE ATTACHMENT TO IR C1-01-0-EP-007, FOR CONCENTRIC TO RESPOND TO THE FOLLOWING QUESTIONS: 1. TO PLEASE EXPAND THE COLUMN THAT SAYS "RATE CASE RETURN ORIGINAL COST PERCENT"; 2. FOR THE PERIOD 2015 TO 2020, PLEASE PROVIDE THE FOLLOWING: (A) THE AVERAGE ROE, (B) THE AVERAGE RATE CHANGE, (C) RATE CASE RETURN ORIGINAL COST PERCENTAGE, AND FOR COMMON EQUITY TO TOTAL CAPITAL PERCENT; 3. TO PROVIDE THE SAME AVERAGE DATA AS WAS PROVIDED IN THE SECOND PART FOR THE CANADIAN UTILITIES IN THE CONCENTRIC SAMPLE; 4. TO PROVIDE THE SAME DATA FOR THE SAME PERIOD, 2015 TO 2020, FOR OPG.	
JT4.11		TO BRING DR. HIGGIN'S QUESTIONS AS REFLECTED IN THE TRANSCRIPT TO CONCENTRIC.	
JT4.12		TO POINT TO THE INTERROGATORY WHERE IMPACT ON CORPORATE SUPPORT OF THE REORGANIZATION SAVINGS WAS PROVIDED.	
JT4.13		TO PROVIDE A RESPONSE TO MR. STEPHENSON'S QUESTIONS REGARDING TOTAL COMPENSATION ENVELOPE AT	

Undertaking	<u>Date</u>	DESCRIPTION	Response Date
		MEDIAN AND IMPACT ON REVENUE REQUIREMENT, WITH DETAILED CALCULATIONS.	
JT4.14		TO PROVIDE THE AUDIT REPORTS THAT WERE LISTED IN THE REVISED LIST.	
JTX4.15		CONFIDENTIAL	
JTX4.16		CONFIDENTIAL	
JTX4.17		CONFIDENTIAL	
JTX4.18 JTX4.19		CONFIDENTIAL	

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EXHIBIT (K) LIST

<u>EXHIBIT</u>	DATE	DESCRIPTION			
<u>K1.1</u>	5/5	EXCEL SPREADSHEET CALLED "SEC TC D2O COST ESTIMATE TABLE.			
<u>K1.2</u>		DOCUMENT ENTITLED "SEC TC NUKE OPERATIONS PROJECT CAPITAL AND 0152 INFORMATION."			
DAY 2 – MAY 6, 2021					
	6/5	NO EXHIBITS WERE FILED.			
DAY 3 – MAY 7, 2021					
<u>K3.1</u>	7/5	DOCUMENT ENTITLED "OPG, PANEL 3, IESO APPROACH TO IMPLEMENT MRP."			
<u>K3.2</u>		REFERENCE DOCUMENTS RELATING TO OEB STAFF'S QUESTIONS.			
<u>K3.3</u>		TWO TABLES DESCRIBED AS OPG PANEL 3, STAFF 271, 320.			
		DAY 4 – MAY 10, 2021			
KTX1.1		CONFIDENTIAL			