UNDERTAKING JI1.1

Undertaking

TO PROVIDE THE DOCUMENTATION RELATED TO OPG'S TRIPLE-R TYPE FILINGS FOR 2019 AND 2020.

Response

OPG's Regulatory Reporting and Record Keeping Requirements are outlined below. OPG has provided, as a series of attachments in chronological order, a consolidated set of these reporting requirements in the years 2019 and 2020. For completeness, OPG has also included references to where certain of these filings or similar information has been provided on the record in this proceeding.

- Within 60 days after each calendar quarter end, unaudited balances of OPG's deferral and variance accounts.

  2019:
  - March 1, 2019 – Summary of Variance & Deferral Account Balances at December 31, 2018 (See Attachment 1)
  - May 30, 2019 – Summary of Variance & Deferral Account Balances at March 31, 2019 (See Attachment 3)
  - August 29, 2019 – Summary of Variance & Deferral Account Balances at June 30, 2019 (See Attachment 6)
  - November 29, 2019 – Summary of Variance & Deferral Account Balances at September 30, 2019 (See Attachment 7)

  2020:
  - February 28, 2020 – Summary of Variance & Deferral Account Balances at December 31, 2019 (See Attachment 9)
  - May 29, 2020 – Summary of Variance & Deferral Account Balances at March 31, 2020 (See Attachment 10)
  - August 28, 2020 – Summary of Variance & Deferral Account Balances at June 30, 2020 (See Attachment 13)
  - November 27, 2020 – Summary of Variance & Deferral Account Balances at September 30, 2020 (See Attachment 15)

- Within 120 days of each December year-end, OPG's MD&A and Financial Statements filed with the Ontario Securities Commission, and OPG's nuclear unit capability factors and the hydroelectric availability for its regulated facilities:

2019:

- April 30, 2019 – OPG's MD&A and Financial Statements Reporting for the year ending December 31, 2018 (See Attachment 2)

2020:

- July 31, 2020 – OPG's MD&A and Financial Statements Reporting for the year ending December 31, 2019 (See Attachment 12)

- Within 60 days for the first three quarters of each year, OPG's MD&A and Financial Statements filed with the OSC, OPG's nuclear unit capability factors and the hydroelectric availability for its regulated facilities:

2019:

- May 30, 2019 – OPG's MD&A and Financial Statements Reporting for the Three Months Ending March 31, 2019 (See Attachment 3)
- August 29, 2019 – OPG's MD&A and Financial Statements Reporting for the Six Months Ending June 30, 2019 (See Attachment 6)
- November 29, 2019 – OPG's MD&A and Financial Statements Reporting for the Nine Months Ending September 30, 2019 (See Attachment 7)

2020:

- May 29, 2020 – OPG's MD&A and Financial Statements Reporting for the Three Months Ending March 31, 2020 (See Attachment 10)
- August 28, 2020 – OPG's MD&A and Financial Statements Reporting for the Six Months Ending June 30, 2020 (See Attachment 13)
- November 27, 2020 – OPG's MD&A and Financial Statements Reporting for the Nine Months Ending September 30, 2020 (See Attachment 15)

- Annually by April 30, information on FTEs, Construction Work in Progress ("CWIP") balances, capital expenditures and capital in-service additions:\

2019:

- April 30, 2019 – FTEs by Representation, CWIP capital, and in-service additions for the year ending December 31, 2018 (See Attachment 2)

2020:

- July 31, 2020[1] – FTEs by Representation, CWIP capital, and in-service additions for the year ending December 31, 2019 (See Attachment 12)

[1] Given the COVID-19 pandemic, the OEB granted an extension for filing of certain reporting requirements from April 30 to July 31, 2020.

- Annually by April 30, performance reports including Total Generating Cost per megawatt-hour (TGC/MWh) for the nuclear business (refiled with benchmarking quartile results by November 30):

  2019:
  - April 30, 2019 – performance reports for the nuclear business for the year ending December 31, 2018 (See Attachment 2[2])
  - November 29, 2019 – performance reports for the nuclear business including benchmark quartile results for the year ending December 31, 2018 (See Attachment 7[3])

  2020:
  - April 30, 2020 – performance reports for the nuclear business for the year ending December 31, 2019 (See Attachment 12[4])
  - November 27, 2020 – performance reports for the nuclear business including benchmarking quartile results for the year ending December 31, 2019 (See Attachment 15[5])

- Annually by April 30, performance reports including TGC/MWh for the regulated hydroelectric business:

  2019:
  - April 30, 2019 – performance reports for the regulated hydroelectric business for the year ending December 31, 2018 (See Attachment 2)

  2020:
  - July 31, 2020[4] – performance reports for the regulated hydroelectric business for the year ending December 31, 2019 (See Attachment 12)

- Annually by June 30, expenses related to nuclear liabilities:

  2019:
  - June 28, 2019 – expenses related to nuclear liabilities for the year ending December 31, 2018 (See Attachment 4[6])

  2020:
  - June 30, 2020 – expenses related to nuclear liabilities for the year ending December 31, 2019 (See Attachment 11[9])

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[2] Also filed at Ex. L-A1-03-CCC-007, Attachment 4.
[3] Also filed at Ex. L-A1-03-CCC-007, Attachments 5 and 6 and Ex. F2-1-1, Attachments 4 and 5.
[4] Also filed at Ex. L-A1-03-CCC-007, Attachment 7.
5 Also filed at Ex. L-A1-03-CCC-007, Attachment 8 and Ex. F2-1-1, Attachment 2.
6 See also Ex. L-C2-01-Staff-086.

- Annually by July 31, an analysis of the actual regulatory return, after tax on rate base, both in dollars and percentages, for the regulated business and comparison with the regulatory return included in the payment amounts:

  2019:
  - July 31, 2019 – information relating to OPG's regulatory return for the year ending December 31, 2018 (See Attachment 5[7], confidential)

  2020:
  - July 31, 2020 – information relating to OPG's regulatory return for the year ending December 31, 2019 (See Attachment 12[8], confidential)
  - September 11, 2020 – OEB Staff's Clarification Questions on OPG's regulatory return for the year ending December 31, 2019 (See Attachment 14, confidential)

- Annually, Darlington Refurbishment Program reporting:

  2019:
  - December 21, 2019 – Darlington Refurbishment Program Annual Report for the year ending September 30, 2019 (See Attachment 8[9])

  2020:
  - December 31, 2020 – Darlington Refurbishment Program Annual Report for the year ending September 30, 2020 (See Attachment 16[10])

[7] See also Ex. L-I1-01-SEC-159, Attachment 1, Tables 2 and 2a, and Ex. C1-1-1 Table 9.
[8] See also Ex. L-I1-01-SEC-159, Attachment 1, Tables 3 and 3a, and Ex. C1-1-1 Table 8, as well as Ex. L-H1-01-AMPCO-178.
[9] Also filed at Ex. D2-2-2, Attachment 2.
[10] Also filed at Ex. L-D2-02-AMPCO-076, Attachment 1.