ONTARIO POWER GENERATION

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June 30, 2020

VIA EMAIL

Ms. Christene E. Long
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON
M4P 1E4

Dear Ms. Long:

Re: OPG Reporting and Record Keeping Requirements

Further to the OEB's direction in EB-2016-0152 Decision and Order (p. 97), please find attached the following information:

1) Annually by June 30, expenses related to nuclear liabilities.

As requested by the OEB, expenses are reported in the form of Chart 1 of undertaking J20.7. Additional lines were added to the form of Chart 1 to address the OEB's request to separately identify ONFA expenses and internally funded expenses. In response to the OEB's direction that the time period of the report should start at April 1, 2008 at the latest, OPG has provided the information beginning April 1, 2005.

There are four tables attached: Table 1 summarizes the entire period from April 1, 2005 to December 31, 2019; Table 2 contains proxy amounts for April 1, 2005 to March 31, 2008, as presented in undertaking J20.7; Table 3 contains actual amounts for April 1, 2008 to December 31, 2016, as presented in undertaking J20.7; and Table 4 contains actual amounts for January 1, 2017 to December 31, 2019.

Yours truly,

Herman Mo

Att.

cc: Cathy Nguyen, OEB
Stephanie Chan, OEB

Numbers may not add due to rounding.

Submitted: June 30, 2020

Ontario Power Generation Inc.
Reporting and Record Keeping Requirements

Table 1[1]
Summary of After-Tax Amounts Collected Versus Amounts Expended for Nuclear Liabilities ($M)
April 1, 2005 to December 31, 2019

Line No.	Description	Note	Apr 1 2005 to Mar 31 2008	Apr 1 2008 to Dec 31 2016	Jan 1 2017 to Dec 31 2019	Total Apr 1 2005 to Dec 31 2019
			(a)	(b)	(c)	(d)
			Note 2			
	Prescribed Facilities					
1	**Total Amounts Recovered (after-tax)**	3	429.4	1,788.0	453.0	2,670.5
2	**Total Amounts Expended (after-tax)**	4	691.6	1,794.7	593.0	3,079.3
3	**Excess of Amounts Recovered over Amounts Expended - Prescribed Facilities (after-tax)** (line 1 - line 2)		(262.2)	(6.7)	(140.0)	(408.8)
	Bruce Facilities					
4	**Total Amounts Recovered (after-tax)**	5	39.4	1,380.9	593.9	2,014.2
5	**Total Amounts Expended (after-tax)**	6	771.2	1,265.7	100.2	2,137.1
6	**Excess of Amounts Recovered over Amounts Expended - Bruce Facilities (after-tax)** (line 4 - line 5)		(731.8)	115.2	493.7	(122.9)
7	**Total Excess of Amounts Recovered over Amounts Expended (after-tax)** (line 3 + line 6)		(993.9)	108.5	353.7	(531.7)

Notes:

1 The following tax rates in effect during the corresponding periods were applied in the analysis: 2005 to 2007 - 34.12%, 2008 - 31.50%, 2009 - 31.00%, 2010 - 29.00%, 2011 - 26.50%, 2012 onwards - 25.00%.

2 As outlined in EB-2016-0152 Ex. C2-1-2, pp. 25-26, amounts recovered represent proxy amounts based on actual values for the period available from the EB-2007-0905 and EB-2010-0008 proceedings.

3 Col. (a) is from Table 2, line 5, col. (e). Col. (b) is from Table 3, line 7, col. (l). Col. (c) is from Table 4, line 7, col. (f).

4 Col. (a) is from Table 2, line 12, col. (e). Col. (b) is from Table 3, line 14, col. (l). Col. (c) is from Table 4, line 14, col. (f).

5 Col. (a) is from Table 2, line 19, col. (e). Col. (b) is from Table 3, line 19, col. (l). Col. (c) is from Table 4, line 19, col. (f).

6 Col. (a) is from Table 2, line 26, col. (e). Col. (b) is from Table 3, line 26, col. (l). Col. (c) is from Table 4, line 26, col. (f).

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Ontario Power Generation Inc.
Reporting and Record Keeping Requirements

Table 2[1]
Proxy After-Tax Amounts Collected Versus Amounts Expended for Nuclear Liabilities ($M)
April 1, 2005 to March 31, 2008

Line No.	Description	Apr 1 to Dec 31 2005	2006	2007	Jan 1 to Mar 31 2008	Total
		(a)	(b)	(c)	(d)	(e)
	Prescribed Facilities					
1	**Pre-tax Proxy Amounts Recovered**	132	156	225	53	566
2	**Reduction in Proxy Regulatory Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Nuclear Liabilities** (line 8 x tax rate)	(72)	(116)	(79)	(13)	(281)
3	**Regulatory Income Taxes on Proxy Amounts Recovered** (line 1 + line 2) x tax rate / (1 - tax rate)	31	21	75	18	145
4	**Total Proxy Regulatory Income Taxes** (line 2 + line 3)	(42)	(95)	(4)	5	(136)
5	**After-tax Proxy Amounts Recovered** (line 1 + line 4)	90	61	221	57	429
6	**Contributions to Segregated Funds**	182	242	225	15	663
7	**Internally Funded Expenditures on Nuclear Liabilities**	31	98	8	28	165
8	**Total Amounts Expended (pre-tax)** (line 6 + line 7)	212	340	233	43	828
9	**Reduction in Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Nuclear Liabilities** (line 8 x tax rate)	(72)	(116)	(79)	(13)	(281)
10	**Income Taxes on Proxy Amounts Recovered** (line 5 x tax rate)	31	21	75	18	145
11	**Total Income Taxes** (line 9 + line 10)	(42)	(95)	(4)	5	(136)
12	**Total Amounts Expended (after-tax)** (line 8 + line 11)	171	245	229	47	692
13	**Excess of Proxy Amounts Recovered over Amounts Expended - Prescribed Facilities (pre-tax)** (line 1 - line 8)	(80)	(184)	(8)	10	(262)
14	**Excess of Proxy Amounts Recovered over Amounts Expended - Prescribed Facilities (after-tax)** (line 5 - line 12)	(80)	(184)	(8)	10	(262)
	Bruce Facilities					
15	**Pre-tax Proxy Amounts Recovered**	87	114	179	34	414
16	**Reduction in Proxy Regulatory Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Nuclear Liabilities** (line 23 x tax rate)	(59)	(85)	(207)	(37)	(388)
17	**Regulatory Income Taxes on Proxy Amounts Recovered** (line 15 + line 16) x tax rate / (1 - tax rate)	14	15	(14)	(2)	14
18	**Total Proxy Regulatory Income Taxes** (line 16 + line 17)	(45)	(69)	(221)	(39)	(374)
19	**After-tax Proxy Amounts Recovered** (line 15 + line 18)	42	45	(42)	(5)	39
20	**Contributions to Segregated Funds**	159	212	563	99	1,033
21	**Internally Funded Expenditures on Nuclear Liabilities**	15	36	43	19	113
22	**Total Amounts Expended (pre-tax)** (line 20 + line 21)	174	248	606	117	1,145
23	**Reduction in Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Internally Funded Expenditures** (line 22 x tax rate)	(59)	(85)	(207)	(37)	(388)
24	**Income Taxes on Proxy Amounts Recovered** (line 19 x tax rate)	14	15	(14)	(2)	14
25	**Total Income Taxes** (line 23 + line 24)	(45)	(69)	(221)	(39)	(374)
26	**Total Amounts Expended (after-tax)** (line 22 + line 25)	129	179	385	79	771
27	**Excess of Proxy Amounts Recovered over Amounts Expended - Bruce Facilities (pre-tax)** (line 15 - line 22)	(87)	(134)	(427)	(84)	(732)
28	**Excess of Proxy Amounts Recovered over Amounts Expended - Bruce Facilities (after-tax)** (line 19 - line 26)	(87)	(134)	(427)	(84)	(732)
29	**Total Excess of Proxy Amounts Recovered over Amounts Expended (pre-tax)** (line 13 + line 27)	(167)	(318)	(435)	(74)	(994)
30	**Total Excess of Proxy Amounts Recovered over Amounts Expended (after-tax)** (line 14 + line 28)	(167)	(318)	(435)	(74)	(994)

Notes:
1 OPG has used the presentation format required by the OEB in EB-2016-0152 Decision and Order, Page 97, adding additional line items to reflect the breakdown between Ontario Nuclear Funds Agreement contributions and internally funded expenditures on Nulcear Liabilities requested by the OEB. Amounts presented are otherwise unchanged form EB-2016-0152 Ex. J20.7.

Numbers may not add due to rounding.

Submitted: June 30, 2020

Ontario Power Generation Inc.
Reporting and Record Keeping Requirements

Table 3[1]
After-Tax Amounts Collected Versus Amounts Expended for Nuclear Liabilities ($M)
April 1, 2008 to December 31, 2016

Line No.	Description	Apr 1 to Dec 31 2008	2009	2010	Jan 1 to Feb 28 2011	Mar 1 to Dec 31 2011	2012	2013	Jan 1 to Oct 31 2014	Nov 1 to Dec 31 2014	2015	2016	Total
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
	Prescribed Facilities												
1	**Total Amounts Recovered (pre-tax)[2]**	147.4	192.4	190.5	36.6	113.8	286.3	208.6	180.7	37.0	198.5	157.0	1,748.8
2	**Reduction in Regulatory Income Taxes for Contributions to Segregated Funds and Forecast Internally Funded Expenditures on Nuclear Liabilities**	(32.1)	(58.6)	(48.2)	(7.3)	(49.8)	(43.9)	(43.2)	(51.0)	(10.7)	(63.5)	(63.8)	(472.1)
3	**(Under)/Over Recovery Due to Differences Between Approved and Actual Nuclear Production**	2.4	4.2	4.4	(0.4)	3.1	1.7	5.3	3.2	(0.4)	4.4	3.0	31.0
4	**Total Reduction in Regulatory Income Taxes** (line 2 + line 3)	(29.7)	(54.4)	(43.8)	(7.7)	(46.7)	(42.2)	(37.9)	(47.8)	(11.0)	(59.1)	(60.8)	(441.1)
5	**Regulatory Income Taxes on Amounts Recovered** ((line 1 + line 4) x tax rate / (1-tax rate))	54.1	62.0	59.9	10.4	24.2	81.4	56.9	44.3	8.6	46.5	32.1	480.4
6	**Total Regulatory Income Taxes** (line 4 + line 5)	24.5	7.7	16.1	2.7	(22.5)	39.1	19.0	(3.5)	(2.4)	(12.6)	(28.7)	39.3
7	**Total Amounts Recovered (after-tax)** (line 1 + line 6)	171.8	200.1	206.6	39.4	91.3	325.4	227.7	177.2	34.6	185.9	128.3	1,788.0
8	**Contributions to Segregated Funds**	44.2	124.7	150.2	24.2	120.8	107.1	98.1	141.6	28.5	172.8	176.7	1,188.9
9	**Internally Funded Expenditures on Nuclear Liabilities**	32.1	63.6	60.2	11.3	57.4	73.9	60.0	45.1	21.7	85.1	90.3	600.7
10	**Total Amounts Expended (pre-tax)** (line 8 + line 9)	76.3	188.3	210.4	35.5	178.2	181.0	158.1	186.7	50.2	257.9	267.0	1,789.6
11	**Reduction in Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Nuclear Liabilities** (line 10 x tax rate)	(24.0)	(58.4)	(61.0)	(9.4)	(47.2)	(45.3)	(39.5)	(46.7)	(12.5)	(64.5)	(66.7)	(475.3)
12	**Income Taxes on Amounts Recovered** (line 7 x tax rate)	54.1	62.0	59.9	10.4	24.2	81.4	56.9	44.3	8.6	46.5	32.1	480.4
13	**Total Income Taxes** (line 11 + line 12)	30.1	3.6	(1.1)	1.0	(23.0)	36.1	17.4	(2.4)	(3.9)	(18.0)	(34.7)	5.1
14	**Total Amounts Expended (after-tax)** (line 10 + line 13)	106.4	191.9	209.3	36.5	155.2	217.1	175.5	184.3	46.3	239.9	232.3	1,794.7
15	**Excess of Amounts Recovered over Amounts Expended - Prescribed Facilities (pre-tax)** (line 1 - line 10)	71.1	4.1	(19.9)	1.2	(64.4)	105.3	50.5	(6.0)	(13.2)	(59.4)	(110.0)	(40.9)
16	**Excess of Amounts Recovered over Amounts Expended - Prescribed Facilities (after-tax)** (line 7 - line 14)	65.4	8.1	(2.7)	2.9	(63.9)	108.3	52.2	(7.2)	(11.7)	(54.0)	(104.0)	(6.7)
	Bruce Facilities												
17	**Actual Bruce Lease Net Revenues Impact**	311.5	(32.6)	(68.6)	(8.5)	89.5	70.5	142.4	81.2	20.5	173.6	231.6	1,011.2
18	**Regulatory Income Tax Impact** (line 17 x tax rate / (1 - tax rate))	143.2	(14.6)	(28.0)	(3.1)	32.3	23.5	47.5	27.1	6.8	57.9	77.2	369.7
19	**Total Amounts Recovered (after-tax)** (line 17 + line 18)	454.7	(47.2)	(96.6)	(11.6)	121.8	94.0	189.9	108.3	27.4	231.5	308.8	1,380.9
20	**Contributions to Segregated Funds**	296.2	214.1	113.9	17.6	87.9	74.9	85.9	(26.2)	(5.1)	(29.4)	(26.9)	802.9
21	**Internally Funded Expenditures on Nuclear Liabilities**	34.9	23.8	19.3	6.6	37.5	55.6	59.6	41.2	19.4	50.7	101.0	449.6
22	**Total Amounts Expended (pre-tax)** (line 20 + line 21)	331.1	237.9	133.2	24.2	125.4	130.5	145.5	15.0	14.3	21.3	74.1	1,252.5
23	**Reduction in Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Internally Funded Expenditures** (line 22 x tax rate)	(104.3)	(73.7)	(38.6)	(6.4)	(33.2)	(32.6)	(36.4)	(3.8)	(3.6)	(5.3)	(18.5)	(356.5)
24	**Income Taxes on Amounts Recovered** (line 19 x tax rate)	143.2	(14.6)	(28.0)	(3.1)	32.3	23.5	47.5	27.1	6.8	57.9	77.2	369.7
25	**Total Income Taxes** (line 23 + line 24)	38.9	(88.4)	(66.6)	(9.5)	(1.0)	(9.1)	11.1	23.3	3.3	52.6	58.7	13.3
26	**Total Amounts Expended (after-tax)** (line 22 + line 25)	370.0	149.5	66.6	14.7	124.4	121.4	156.6	38.3	17.6	73.8	132.8	1,265.7
27	**Excess of Amounts Recovered over Amounts Expended - Bruce Facilities (pre-tax)** (line 17 - line 22)	(19.6)	(270.5)	(201.8)	(32.7)	(35.9)	(60.0)	(3.0)	66.2	6.2	152.4	157.5	(241.3)
28	**Excess of Amounts Recovered over Amounts Expended - Bruce Facilities (after-tax)** (line 19 - line 26)	84.7	(196.8)	(163.2)	(26.3)	(2.7)	(27.4)	33.3	70.0	9.8	157.7	176.0	115.2
29	**Total Excess of Amounts Recovered over Amounts Expended (pre-tax)** (line 15 + line 27)	51.5	(266.4)	(221.7)	(31.5)	(100.3)	45.3	47.5	60.2	(7.0)	92.9	47.5	(282.1)
30	**Total Excess of Amounts Recovered over Amounts Expended (after-tax)** (line 16 + line 28)	150.1	(188.6)	(165.9)	(23.4)	(66.6)	80.9	85.5	62.8	(1.9)	103.6	72.0	108.5

Notes:

1 OPG has used the presentation format required by the OEB in EB-2016-0152 Decision and Order, Page 97, adding additional line items to reflect the breakdown between Ontario Nuclear Funds Agreement contributions and internally funded expenditures on Nulcear Liabilities requested by the OEB. Amounts presented are otherwise unchanged form EB-2016-0152 Ex. J20.7.

2 Includes pre-tax revenue requirement impact, under/over recovery due to differences between approved and actual nuclear production, and pre-tax amounts recorded in the Nuclear Liabilities Deferral Account and the Impact of Changes in Station End-of-Life (2015) Deferral Account.

Numbers may not add due to rounding.

Submitted: June 30, 2020

Ontario Power Generation Inc.
Reporting and Record Keeping Requirements

Table 4[1]
After-Tax Amounts Collected Versus Amounts Expended for Nuclear Liabilities ($M)
January 1, 2017 to December 31, 2019

Line No.	Description	Jan 1 to May 31 2017	Jun1 to Dec 31 2017	Total 2017	2018	2019	Total
		(a)	(b)	(c)	(d)	(e)	(f)
	Prescribed Facilities						
1	**Total Amounts Recovered (pre-tax)[2]**	53.4	92.2	145.7	176.4	193.6	515.6
2	**Reduction in Regulatory Income Taxes for Contributions to Segregated Funds and Forecast Internally Funded Expenditures on Nuclear Liabilities**	(19.4)	(34.4)	(53.7)	(61.2)	(53.7)	(168.6)
3	**(Under)/Over Recovery Due to Differences Between Approved and Actual Nuclear Production**	3.9	(1.4)	2.5	(3.8)	(5.9)	(7.2)
4	**Total Reduction in Regulatory Income Taxes** (line 2 + line 3)	(15.5)	(35.7)	(51.2)	(65.0)	(59.6)	(175.8)
5	**Regulatory Income Taxes on Amounts Recovered** ((line 1 + line 4) x tax rate / (1-tax rate))	12.6	18.8	31.5	37.1	44.7	113.3
6	**Total Regulatory Income Taxes** (line 4 + line 5)	(2.8)	(16.9)	(19.7)	(27.9)	(15.0)	(62.6)
7	**Total Amounts Recovered (after-tax)** (line 1 + line 6)	50.6	75.4	125.9	148.5	178.6	453.0
8	**Contributions to Segregated Funds**	42.7	59.8	102.5	102.5	102.5	307.5
9	**Internally Funded Expenditures on Nuclear Liabilities**	51.3	77.6	128.9	101.4	101.8	332.2
10	**Total Amounts Expended (pre-tax)** (line 8 + line 9)	94.1	137.4	231.4	203.9	204.3	639.7
11	**Reduction in Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Nuclear Liabilities** (line 10 x tax rate)	(23.5)	(34.3)	(57.9)	(51.0)	(51.1)	(159.9)
12	**Income Taxes on Amounts Recovered** (line 7 x tax rate)	12.6	18.8	31.5	37.1	44.7	113.3
13	**Total Income Taxes** (line 11 + line 12)	(10.9)	(15.5)	(26.4)	(13.9)	(6.4)	(46.7)
14	**Total Amounts Expended (after-tax)** (line 10 + line 13)	83.2	121.9	205.1	190.1	197.9	593.0
15	**Excess of Amounts Recovered over Amounts Expended - Prescribed Facilities (pre-tax)** (line 1 - line 10)	(40.6)	(45.1)	(85.8)	(27.6)	(10.7)	(124.1)
16	**Excess of Amounts Recovered over Amounts Expended - Prescribed Facilities (after-tax)** (line 7 - line 14)	(32.6)	(46.5)	(79.1)	(41.6)	(19.3)	(140.0)
	Bruce Facilities						
17	**Actual Bruce Lease Net Revenues Impact**	64.5	80.9	145.4	149.6	150.4	445.4
18	**Regulatory Income Tax Impact** (line 17 x tax rate / (1 - tax rate))	21.5	27.0	48.5	49.9	50.1	148.5
19	**Total Amounts Recovered (after-tax)** (line 17 + line 18)	86.0	107.9	193.9	199.4	200.5	593.9
20	**Contributions to Segregated Funds**	(42.7)	(59.8)	(102.5)	(102.5)	(102.5)	(307.5)
21	**Internally Funded Expenditures on Nuclear Liabilities**	31.6	49.2	80.8	62.3	100.0	243.1
22	**Total Amounts Expended (pre-tax)** (line 20 + line 21)	(11.1)	(10.6)	(21.7)	(40.2)	(2.5)	(64.4)
23	**Reduction in Income Taxes for Contributions to Segregated Funds and Internally Funded Expenditures on Nuclear Liabilities** (line 22 x tax rate)	2.8	2.7	5.4	10.1	0.6	16.1
24	**Income Taxes on Amounts Recovered** (line 19 x tax rate)	21.5	27.0	48.5	49.9	50.1	148.5
25	**Total Income Taxes** (line 23 + line 24)	24.3	29.6	53.9	59.9	50.8	164.6
26	**Total Amounts Expended (after-tax)** (line 22 + line 25)	13.2	19.0	32.2	19.7	48.3	100.2
27	**Excess of Amounts Recovered over Amounts Expended - Bruce Facilities (pre-tax)** (line 17 - line 22)	75.6	91.5	167.1	189.8	152.9	509.8
28	**Excess of Amounts Recovered over Amounts Expended - Bruce Facilities (after-tax)** (line 19 - line 26)	72.8	88.9	161.7	179.7	152.3	493.7
29	**Total Excess of Amounts Recovered over Amounts Expended (pre-tax)** (line 15 + line 27)	34.9	46.4	81.3	162.2	142.2	385.7
30	**Total Excess of Amounts Recovered over Amounts Expended (after-tax)** (line 16 + line 28)	40.2	42.4	82.6	138.2	133.0	353.7

Notes:

1 OPG has used the presentation format required by the OEB in EB-2016-0152 Decision and Order, Page 97, adding additional line items to reflect the breakdown between Ontario Nuclear Funds Agreement contributions and internally funded expenditures on Nulcear Liabilities requested by the OEB.

2 Includes pre-tax revenue requirement impact, under/over recovery due to differences between approved and actual nuclear production, and pre-tax amounts recorded in the Nuclear Liability Deferral Account, the Impact Resulting from Changes in Station End-of-Life Dates (December 31, 2015) Deferral Account and the Impact Resulting from Changes to Pickering Station End-of-Life Dates (December 31, 2017) Deferral Account in the applicable years.