CME Interrogatory #6

Interrogatory

Reference: N/A

To the extent that they are not already on the record, please provide all documents relied upon by OPG's experts in providing their evidence/report. These reports would include:

(a) Innovative Customer Engagement Report
(b) Ontario Power Generation Common Equity Ration Study by Concentric Energy Advisors
(c) Pegasus Global Holdings, Inc. – Testimony of Dr. Patricia D. Galloway
(d) Bates White Economic Consulting - Report
(e) ScottMadden Evaluation of OPG Nuclear Benchmarking
(f) OPG Nuclear Cost Performance Benchmarking – Methodology to Adjust for Refurbishment and Validation of Implementation (ScottMadden)
(g) OPG Nuclear Cost Performance Benchmarking – A Study of Factors Impacting TGC/MWH Performance with Normalizing Adjustments to Facilitate Closer Comparison (ScottMadden)
(h) 2019 Goodnight Nuclear Staffing Benchmarking Analysis

Response

OPG is revising the response to this interrogatory question following the Interrogatories Refusals Discussion meeting on April 23, 2021 to provide lists of documents that the above referenced experts relied upon in producing their reports.

The following responses have been prepared by the respective listed experts:

(a) Innovative Customer Engagement Report

None.

(b) Ontario Power Generation Common Equity Ration Study by Concentric Energy Advisors

See Attachment 1.

(c) Pegasus Global Holdings, Inc. – Testimony of Dr. Patricia D. Galloway

See Ex. D2-2-11, Attachment 1, pp. 70-74 for a list of OPG documents relied upon by Pegasus-Global.

(d) Bates White Economic Consulting

See Ex. D2-2-11, Attachment 3, pp. 44-50 for a list of OPG documents relied upon by Bates White. See also Ex. L-D2-02-AMPCO-137, Attachments 1-142 for a production of a subset of OPG documents relied upon by Bates White.

(e) ScottMadden Evaluation of OPG Nuclear Benchmarking

- 2014 Nuclear Benchmarking Report
- ScottMadden Evaluation of OPG Nuclear Benchmarking (2014)
- 2019 Nuclear Benchmarking Report and supporting benchmarking calculations, tables, and charts
- OPG Nuclear Business Planning Procedure (N-PROC-AS-0080 Rev 004)
- OPG Nuclear Cost Performance Benchmarking – Methodology to Adjust for Refurbishment and Validation of Implementation (ScottMadden)
- OPG Nuclear Cost Performance Benchmarking – A Study of Factors Impacting TGC/MWH Performance with Normalizing Adjustments to Facilitate Closer Comparison (ScottMadden)

(f) OPG Nuclear Cost Performance Benchmarking – Methodology to Adjust for Refurbishment and Validation of Implementation (ScottMadden)

- OPG 2017 Revenue Cost Assignment Allocation Methodology
- OPG 2017 Normalized TGC/MWh and NFOC/MWh calculations

(g) OPG Nuclear Cost Performance Benchmarking – A Study of Factors Impacting TGC/MWH Performance with Normalizing Adjustments to Facilitate Closer Comparison (ScottMadden)

- EUCG data covering 2009 to 2017 in Excel
- ScottMadden Custom Nuclear Outage Benchmarking Study
- Other public sources:
    - US Energy Information Administration (EIA) form 860 data via S&P Global Market Intelligence
    - Statistics Canada: Gross Domestic Product – Implicit Price Index – Final Domestic Demand (GDP-IPI-FDD)
    - Ontario Energy Board (OEB): Decision and Order EB-2016-0152

(h) 2019 Goodnight Nuclear Staffing Benchmarking Analysis

- Org Chart – OPG Nuclear Corporate – Sept 10, 2019.pdf
- OPG staff lists and contractor data in Excel:
  - Goodnight OPG HC – Aug 31 2019_r1 Nov 1 to Dan.xlsx
  - Goodnight OPG 2019 – HC Aug 31 2019 FTEs Sept 2018- Aug 2019_r2 to Dan.xlsx
  - Goodnight OPG 2019 – Oncore Base Proj OMA Sep 2018-Aug 2019_r1 to Dan.xlsx
  - Goodnight OPG 2019 – Purch Serv Base Proj OMA Sept 2018-Aug 2019_r1 to Dan.xlsx
- Goodnight Consulting Nuclear Plant Staffing Database