ONTARIO POWER GENERATION

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BY RESS

July 9, 2021

Ms. Christine Long
Registrar
Ontario Energy Board
27th Floor - 2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Long:

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

Enclosed are amendments to OPG's evidence. OPG has submitted these documents through the Regulatory Electronic Submissions System ("RESS"). This material will also be available on OPG's website at www.opg.com. Appended to this letter is an updated Exhibits List with the date of updates as well as all exhibits with amendments.

Refiling of Confidential Documents

Pursuant to the OEB's Decision on Confidentiality dated June 8, 2021, OPG is refiling the following interrogatory and undertaking responses reflecting the removal of certain redactions:

- Ex. A2-2-1, Attachments 1 and 2
- Ex. L-D2-02-AMPCO-115, Attachment 1
- Ex. L-F4-03-SEC-149
- Ex. JTX4.18

Amendments to Evidence

OPG is making evidence amendments as detailed below.[1] These amendments are corrections and clarifications that do not have an impact on approvals sought in the application. A number of these corrections were previously identified and addressed during the Technical Conference and the associated undertaking responses, and are now reflected in the original evidence through these corrections.

[1] In the course of preparing Technical Conference undertaking responses, OPG also filed evidence amendments on June 6, 2021 and June 29, 2021 to the following exhibits: L-A2-02-CCC-013, L-A2-02-Staff-019, L-D2-02-AMPCO-079, L-D3-01-Society-007, and JT1.21. These amendments are already available on RESS.

Corrections to Pre-filed Evidence

Item	Exhibit	Description of change
1.	D2-1-3	• Certain projects' total project cost and in-service amounts provided at Ex. D2-1-3 were incorrect. This does not impact the proposed rate base, which reflects the correct amounts. The following revisions have been made to correct the evidence: ○ Section 3.3: Numerical corrections – Total Project Costs and variance amounts have been updated to align with Table 1b for Projects #25619 ($61.3M instead of $59.0M), #46634 ($21.2M instead of $27.3M), and #40976 ($40.4M instead of $39.3M, and $3.1M variance instead of $2.0M) ○ Table 1b: Numerical corrections – Total in-service (column k) amount has been corrected for Project #25619 ($59.0M instead of $59.6M) and Total Project Costs (column g) have been corrected for Projects #31552 ($33.0M instead of $37.6), #80111 ($30.8M instead of $43.0M) and #40976 ($40.4M instead of $30.8M) ○ Table 1b: Numerical correction – Subtotal of Complete/Deferred/Cancelled Projects ($588.9M instead of $596.1M) ○ Table 1d: Numerical corrections – Total portfolio project cost ($4,108.7M instead of $4,115.9M). • As noted in Ex. JT1.25, Projects #80020, #80117 and #83051 were incorrectly characterized as ongoing EB-2016-0152 projects and should instead have been included as new projects in Ex. D2-1-3. The following corresponding corrections have been made in Tables 2b-2d: ○ Table 2b, line 20: Project #80020 moved to Table 2g. ○ Table 2c, line 32: Project #83051 moved to Table 2g. ○ Table 2d, line 46: Project #80117 moved to Table 2g. Tables 2a-2g amended to reflect the shift in line numbers due to the above changes.
2.	D3-1-2	• Table 2d: Numerical correction – the Total line has been updated to account for prior corrections filed on April 29, 2021.
3.	F2-5-1	• Page 2, line 4: Numerical correction – forecast increase has been corrected to 16% instead of 32%.
4.	F3-1-2	• Page 3, line 10: Editorial correction – As noted Ex. L-F3-01-Staff-252, the missing wording was intended to refer to "SAP Enterprise and Microsoft Azure cloud computing as part of OPG's digital strategy".
5.	F3-2-1	• Page 4, Chart 2: Numerical corrections – offsetting correction as between property tax and operating cost components of the proposed Clarington Campus asset

		service fee for 2024. The total Clarington Campus asset service fee is unchanged.
6.	F4-3-1	• Page 10, Figure 3: Corrected 2016-2019 Actuals amounts to reflect correction to Attachment 1 below. • Page 11, Figure 4: Corrected 2016-2019 FTEs by representation to reflect correction to Attachment 1 below. • Attachment 1: As identified in Ex. L-F4-03-Society-018, Attachment 1 has been updated to adjust for certain imprecision in the breakdown of compensation by employee representation for historical years.

Corrections to Interrogatory Responses

Item	Exhibit	Description of Change
7.	L-A1-02-CCC-001	• Page 2, Footnote 1: Numerical correction – As noted in Tr. Tech. Conf., May 10, 2021, p. 79, lines 1-5, the footnote should have read December 31, 2020, as opposed to December 31, 2021.
8.	L-A1-02-SEC-011	• Attachment 1, Page 2: Inclusion Error – removed reference to "ARC 2018 Q1 Stakeholders' Reward Plan ("SRP") Review", which was erroneously included in the list of completed engagements.
9.	L-A1-03-Staff-008	• Page 2, Chart 1: Numerical correction – OEB-approved ROE for 2020 revised to 9.06% from 9.16%, reflecting the correct weighting, by rate base, between the nuclear and regulated hydroelectric OEB-approved ROE.

10.	L-C2-01-CCC-029	• Attachment 1:
		  ○ Table 1, col. (g), lines 4 and 5: Numerical correction – return on ARC rate base rebalanced between return at weighted average accretion rate and return at weighted average cost of capital, consistent with the correct lesser of Asset Retirement Cost ("ARC") and Unfunded Nuclear Liabilities ("UNL") calculation provided in Ex. JT3.17.
		  ○ Table 1a, Note 1, lines 6a and 7a: Numerical correction – Average UNL updated consistent with Ex. JT3.17.

11.	L-C2-01-Staff-086	• Attachment 1:
		  ○ Updated to reflect corrections in Item 25 below.
		  ○ Tables 4 and 5, line 1 and Note 2: Corrected to include amounts recorded in the Capacity Refurbishment Variance Account.
		  ○ Table 1: Summary table updated for changes above.

12.	L-D2-01-AMPCO-072	• Attachment 2, line 16: As noted in Ex. JT2.17, the "New Roof Area Placed In-Service in Square Feet" line was improperly formatted into millions square feet. The table has been revised to show the values in square feet.

13.	L-D2-01-Staff-102	• Page 1, lines 21, 25: Numerical corrections – reflected the impact of the correction in Item 1 above.
14.	L-D2-01-Staff-113	• Page 4, Chart 1: Numerical corrections – reflected the impact of the correction in Item 1 above.
15.	L-D2-02-SEC-084	• Page 5-6: Removed duplication in the listing of documents.
16.	L-D3-01-SEC-111	• As noted in Ex. JT2.30 and Ex. JT2.33, OPG identified minor revisions and clarifications to Ex. L-D3-01-SEC-111: ○ Chart 2: Numerical correction to NPV savings to align with financial model provided in Ex. JT2.30, including project cash flows and certain operating costs. Expanded description of cost escalation assumptions in footnote 5. ○ Chart 3: To align with Ex. JT2.33, numerical correction to total annual savings and annual savings allocated to nuclear, including the addition of the 303 Townline Road site. A "Total" row has also been added.
17.	L-F2-01-VECC-026	• Page 1, line 27: Numerical correction – response to part a) has been corrected to indicate that there were three (not two) outages removed due to the shift from a 24 month to a 30 month outage cycle.
18.	L-F2-04-Staff-238	• Page 2, line 8, Page 3, line 20, and Page 4, line 14: Numerical correction – same correction as Item 17 above.
19.	L-F3-01-Energy Probe-55	• Page 1, lines 29-32: Numerical correction and other minor clarifications in the variance explanation for Real Estate costs.
20.	L-F3-01-Society-017	• As noted in Ex. JT2.33, OPG identified minor numerical corrections to the cost savings referenced at Ex. L-F3-01-Society-017 on page 2, lines 10, 13, 15.
21.	L-F3-01-Staff-250	• Page 2: Added clarifying footnote to explain amendments to Attachment 1 below. • Attachment 1, Table 1: Corrected 2020 costs and updated 2021 costs related to COVID-19, consistent with the prior updates to Ex. L-A2-02-CCC-013 filed on June 6, 2021.
22.	L-F3-01-Staff-254	• Page 3: Additional information – updated part f) to complete response.
23.	L-F3-01-Staff-255	• Page 2: Inclusion error – Removed line which incorrectly attributed the response to part c) to Hackett.
24.	L-F3-02-Energy Probe-059	• Page 1, Chart 1: Corrected consistent with Item 5 above.

25.	L-F4-01-Staff-271	• Attachment 1: ○ Editorial correction – header was incorrectly titled as Attachment 2. Corrected to Attachment 1. ○ Table 2, Line 5: Numerical correction – as identified in Ex. JT3.18, the amounts at line 5 have been corrected to equal to Attachment 1, Table 2b, Note 5, line 5f. ○ Table 2, line 8 and line 20: Numerical corrections – Low & intermediate level waste management variable expenses increased at line 8 and decreased at line 20 by the same amount, reflecting corrected allocation between the Impact Resulting from Optimization of Pickering Station End-of-Life Dates Deferral Account and the Capacity Refurbishment Variance Account. ○ Table 2, line 4: Numerical correction – return on ARC rate base corrected consistent with the lesser of ARC and UNL adjustment provided in Ex. JT3.17. ○ Table 2a, Note 3, lines 3a and 3b: Numerical corrections – corrected amounts as between lines 3a and 3b, as explained in Tr. Tech. Conf., May 7, 2021, pp. 96-97. ○ Table 2b, note 4, line 4b: Numerical correction – corrected Average UNL balances consistent with Ex. JT3.17. ○ Table 2b, Note 7: Updated based on corrections to Table 2, lines 8 and 20 above.
26.	L-F4-02-SEC-139	• Page 1, Line 22: Reference error – revised with correct cross-reference.
27.	L-F4-03-AMPCO-163	• Page 1, Figure 3: Corrected consistent with Item 6 above.
28.	L-F4-03-AMPCO-169	• Attachment 1: ○ Removed 2020 Plan data, which was included in error and is not accurate. A revised Excel document has been uploaded to RESS.
29.	L-F4-03-AMPCO-172	• Page 1: Reference error – as noted and corrected in Ex. JT4.9.
30.	L-F4-03-Energy Probe-061	• Page 2: modified response in parts b) and c) to provide further clarification in relation to contractor overtime.
31.	L-F4-03-PWU-015	• Page 1, line 17: Reference error – corrected reference. The Excel document has also been uploaded to RESS as Attachment 1.
32.	L-F4-03-Society-025	• Page 2: Modified response in parts c) and d) to provide further clarification in relation to relative job rates.
33.	L-F4-03-Staff-278	• Page 1, line 36: Numerical correction – OPG had 43 (not 21) regular vacancies for management roles as at March 31, 2021.
34.	L-H1-01-Environmental Defence-027	• Attachment 1: Numerical correction – corrected impacts arising from COVID-19, consistent with the prior updates to Ex. L-A2-02-CCC-013 filed on June 6, 2021. Corrected associated footnote 9, as well as certain column headings.

35.	L- H1-01-Staff-320	• Attachment 1: Numerical correction – corrected impacts arising from COVID-19 in Table 1 and Table 1c, consistent with the prior updates to Ex. L-A2-02-CCC-013 filed on June 6, 2021.
36.	L- H1-01-Staff-328	• Page 3, Chart 2: Numerical correction – corrected DRP and D2O Storage Project rate base and depreciation values.
37.	L-H1-01-Staff-337	• Attachment 1, Table 1a, Note 7: Numerical correction – reference to amount recorded in the Capacity Refurbishment Variance Account corrected to $1.6M (instead of $11.2M).
38.	L-I1-03-Staff-344	• Attachment 3, Table 1: Numerical correction – corrected the "Lowest Cash Flow from Operations pre-working-Capital to Debt Ratio" and "Lowest Funds from Operations to Debt Ratio" for certain alternatives shown.

Corrections to Technical Conference Undertakings

Item	Exhibit	Description of Change
39.	JT3.16	• Page 1, Chart 1: Numerical corrections to reflect the updates to Items 10 and 25 above.

Respectfully submitted,

Evelyn Wong

cc: Aimee Collier, OPG
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