CCC Interrogatory #1

Interrogatory

Reference:

Please provide a table setting out the following:

a) A list of all of the external consulting engagements and reports undertaken to support the Application;
b) Of the reports undertaken a list of those that have been filed as evidence and those that have not;
c) The projected overall costs of those engagements broken out by costs incurred to date and forecast costs;
d) An indication as to whether the work was subject to an RFP process. If the work was not, an explanation as to why not;
e) The terms of reference for the work;
f) An explanation as to why the consultants are in most cases engaged by Torys and not directly by OPG.

Response

a) to e) See Chart 1 below.

OPG has not provided a forecast of the costs for each engagement as the remaining costs to be incurred will be dictated by the level of involvement of each consultant throughout the balance of the proceeding. As noted in response to Ex. L-F3-01-VECC-029, OPG's actual costs on these engagements will not be included for recovery over the 2022-2026 IR term.

Chart 1 – External Consulting Engagements

Consultant	Engagement (a)	Filed in Evidence (b)	Cost[1] (c)	RFP Process (d)	Terms of Reference (e)
Innovative Research Group Inc.	Customer Engagement	Yes	• Incurred: [redacted]	No – Torys retained the consultant. See part f).	Attachment 1 (confidential)
Pegasus-Global Holdings, Inc.	Darlington Refurbishment Program – Remaining Units Readiness	Yes	• Incurred: [redacted]	No – Torys retained the consultant. See part f).	Ex. D2-2-11, Attachment 2 (confidential)
Bates White Economic Consulting	Construction Cost Estimate for the Darlington D2O Storage Project –	Yes	• Incurred: [redacted]	No – Torys retained the consultant. See part f).	Ex. D2-2-11, Attachment 4 (confidential)
KPMG LLP	Projects and Modifications	Yes	• Incurred: [redacted]	No – Torys retained the	Attachment 2 (confidential)

	Project Management Audit			consultant. See part f).	
Goodnight Consulting Inc.	2019 Nuclear Staffing Benchmarking Analysis	Yes	• Incurred: [redacted]	Yes	Attachment 3
Scott Madden Management Consultants	• Methodology to Adjust for DRP • Normalizing Adjustments	Yes	• Incurred: [redacted]	No – Torys retained the consultant. See part f).	Attachment 4
Scott Madden Management Consultants	Nuclear Benchmarking	Yes	• Incurred: [redacted]	No – single source justification	Attachment 5
The Hackett Group	Corporate Costs Benchmarking	Yes	• Incurred: [redacted]	Yes (RFQ)	Attachment 6 (confidential)
Willis Towers Watson	Compensation Benchmarking	Yes	• Incurred: [redacted]	Yes	Ex. L-F4-03-Staff-287, Attachment 1
KPMG LLP	Nuclear Liabilities Jurisdictional Study Methodology	Yes	• Incurred: [redacted]	Yes	Attachment 7
Navigant Consulting Ltd.	Cash Working Capital Study (Lead Lag)	Yes	• Incurred: [redacted]	Yes	Attachment 8 (confidential)
Concentric Energy Advisors	Cost of Capital	Yes	• Incurred: [redacted]	No – Torys retained the consultant. See part f)	Ex. C1-1-1, Attachment 2
Elenchus Research Associates Inc.	Cost Allocation Study	Yes	• Incurred: [redacted]	Yes (as part of broader RFP)	Ex. L-F3-01-CCC-050, Attachment 1
Concentric Energy Advisors	Depreciation Study	Yes	• Incurred: [redacted]	No – single source justification	Attachment 9 (confidential)

Notes:
[1] Incurred is to December 31, 2020 for support prior to filing of application.

f) Torys engaged consultants as part of providing legal advice with respect to the preparation of OPG pre-filed evidence and supporting expert reports to be filed as part of OPG discharging its legal burden of proof that the Payment Amounts sought in the application are just and reasonable.