Evelyn Wong
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BY RESS

July 23, 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")
Filing of Undertaking Responses and Request for Confidential Treatment

Undertaking Responses

The Technical Conference for EB-2020-0290 was held on May 3, 6, 7, and 10, 2021. Between May 17th and June 14th, OPG filed over 110 undertaking responses. OPG has submitted these responses through the Regulatory Electronic Submissions System. These responses are also made available on OPG's website at https://www.opg.com/about-us/regulatory-affairs/oeb-applications/.

Confidentiality

Most of OPG's responses to the undertakings are on the public record. However, certain undertakings requested of OPG required responses that include information that OPG seeks confidential treatment for in accordance with Rule 10 of the Ontario Energy Board's ("**OEB**") *Rules of Practice and Procedure* and section 5.1 of the OEB's *Practice Direction on Confidential Filings* (the "**Practice Direction**"). A list of the affected responses and any related attachments is provided in **Appendix 'A'**.

Additionally,

- in response to a request made on behalf of SEC, AMPCO and CME, OPG has agreed to produce additional documents that were incorporated by reference into a number of OPG's interrogatory responses with respect to the D2O Storage Project;
- OPG revised its response to Ex. L-D3-01-Society-007 following Motions Day on May 21, 2021 and also revised its response to Ex. A2-02-CCC-014 to provide Attachment 1; and
- OPG is proposing revised redactions for the *in camera* session transcript from Day 4 of the Technical Conference ("**Day 4 TC Transcript**").

OPG similarly requests confidential treatment of these documents, which are listed in **Appendix 'B'**, **Appendix 'C'**, and **Appendix 'D'** respectively.

Under the headings "Reasons for Confidential Treatment for Undertaking Responses", "Reasons for Confidential Treatment for Additional D2O Documents", "Reasons for Confidential Treatment for Revised Interrogatory Responses", and "Reasons for Confidential Treatment of the Day 4 Technical Conference Transcript", below, OPG sets out the reasons for these confidentiality requests, including why public disclosure would be detrimental to OPG (and in some instances, to third parties).

Given the participation in this proceeding of OPG's two labour unions, the Power Workers' Union ("**PWU**") and the Society of Energy Professionals ("**Society**"), OPG has a particular concern with the possibility of certain confidential information, which has the potential to interfere with collective bargaining negotiations, being disclosed to either PWU or Society. While OPG has ensured that any such information has been marked as confidential and would be redacted from the public record, this information would in the normal course be available to those who file a Declaration and Undertaking. Consistent with the OEB's Decision on Confidentiality – Pre-Filed Evidence dated April 13, 2021, OPG requests that OPG's labour-related confidential information, identified below in Section (c) (Labour-Sensitive Information), be withheld from experts or consultants on behalf of PWU or Society who have not also filed an affidavit with the OEB affirming that they are external to and at arms-length from the PWU and Society, as applicable, and that they are not and will not be involved in any collective bargaining-related activities on behalf of PWU or Society.

Requests for Permanent Redaction of Personal Information and Information Related to OPG's Unregulated Acquisitions

Additionally, OPG updated its interrogatory response to Ex. L-D2-02-AMPCO-079 by revising Attachment 2 and filing additional attachments. The information that OPG is proposing to redact in these documents relates to personal information within the meaning of the *Freedom of Information and Protection of Privacy Act* (Ontario). Accordingly, OPG is proposing to permanently redact, without disclosure except to the OEB, personal information, in accordance with Rule 9A of the OEB's *Rules of Practice and Procedure* and section 4.3.1 of the Practice Direction.

OPG also revised its response to Ex. L-A2-02-CCC-014 to provide Attachment 1, which contains information related to OPG's unregulated acquisitions that is not available to the public and is unrelated to the determination of payment amounts for OPG's regulated business.

Under a separate cover letter that will be marked "For OEB Review Only", to be sent concurrently, OPG provides unredacted versions of the relevant pages from the affected documents.

Attachments

As a result of the various categories of redactions in its filing, OPG attaches the following (a separate, non-confidential version of this letter attaches all but Attachments 'A', 'B', 'C', and 'D'):

1. **Attachment 'A':** *Confidential*, unredacted versions of OPG's responses to undertakings and related attachments that are the subject of this request (except that permanent redactions will remain redacted). The specific portions of these documents constituting the confidential information are marked with red boxes.

2. **Attachment 'B':** *Confidential*, unredacted versions of the additional documents that were incorporated by reference into a number of OPG's interrogatory responses with respect to the D2O Storage Project and that OPG is producing in response to a request made on behalf of SEC, AMPCO and CME. The specific portions of these documents constituting the confidential information are marked with red boxes.

3. **Attachment 'C':** *Confidential*, unredacted versions of the revised interrogatory response and attachment that OPG is filing in response to Ex. L-D3-01-Society-007 and Ex. L-A2-02-CCC-014, respectively. The specific portions of these documents constituting the confidential information are marked with red boxes.

4. **Attachment 'D':** *Confidential*, unredacted version of the Day 4 TC Transcript. The specific portions of this document constituting the confidential information are marked with red boxes.

5. **Attachment 'E':** In support of OPG's request for certain redactions, a copy of the Decision on Confidentiality – Interrogatory Responses dated June 8, 2021.

In this request, OPG references several prior OEB decisions on the confidential treatment of OPG information. These include procedural orders and decisions from EB-2013-0321, EB-2016-0152 and EB-2020-0290. As copies of these referenced decisions were included in OPG's previous confidentiality request letters in this Application, OPG has not re-filed these decisions with the present request.

OEB Procedure

Pursuant to the OEB's announcement on June 23, 2020 with respect to the OEB Digitization Program, OPG is providing this letter along with the attachments electronically through the OEB Regulatory Electronic Submission System.

As an interim measure for efficiency, prior to the OEB making its final determination on OPG's request for confidential treatment, OPG would be amenable to proceeding as though OPG's request for confidentiality has been granted. However, OPG reserves the right to submit that it may not be appropriate for any particular intervenor to review certain confidential information even though it has completed and signed a Declaration and Undertaking. This may arise, for example, if the intervenor may gain an unfair competitive advantage simply by being an intervenor who has signed a Declaration and Undertaking. The OEB has made orders of this nature in prior OPG proceedings, such as in Procedural Order No. 4 in EB-2016-0152.

On a final determination, should the OEB grant OPG's request for confidentiality, OPG proposes that the OEB order the documents be disclosed, subject to any conditions the OEB may find appropriate, to only those persons that by then have already signed, or that subsequently sign, a Declaration and Undertaking and, in the case of labour-sensitive information, that any experts or consultants of PWU or Society, provide an additional affidavit.

In addition, consistent with section 6.2 of the Practice Direction, OPG requests that during oral proceedings any reference to information which the OEB has determined to be confidential, be conducted *in camera* to preserve its confidential nature.

In the event that OPG's confidentiality request is refused, in whole or in part, and OPG in turn requests that some or all of the information that is the subject of this request be withdrawn in accordance with section 5.1.12 of the Practice Direction, all persons in possession of the said information will be required to promptly destroy the information and confirm its destruction in accordance with the Declaration and Undertaking.

Reasons for Confidential Treatment for Undertakings Responses

The information for which OPG requests confidential treatment in its undertakings responses are categorized as follows:

a. references to vendor/contractor performance,
b. commercially-sensitive third party information,
c. labour-sensitive information,
d. combined regulated and unregulated assets and business of OPG,
e. commercially-sensitive information with respect to office buildings and leases,
f. Clarington Corporate Campus information, and
g. other responses and documents that do not fall within these categories.

OPG's reasons for requesting confidential treatment are set out below for each of these categories. As mentioned above, OPG's responses to undertakings and related attachments referenced below are provided in the confidential, unredacted versions filed in Attachments 'A', 'B', 'C', and 'D'.

a. References to Vendor/Contractor Performance

Attachments 1, 2, and 9 to Undertaking JT4.14 contain internal audit reports in connection with the Darlington Refurbishment Program. OPG seeks approval to redact information relating to vendor/contractor performance in these internal audit reports. Disclosing this information publicly could prejudice the competitive positions of the relevant parties involved, damage contractual relationships, and cause reputational harm to vendors/contractors. The confidential nature of this information was accepted by the OEB in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses) and EB-2016-0152.

b. Commercially-Sensitive OPG and Third Party Information

Attachment 3 to Undertaking JT4.14 contains an internal audit report related to OPG's competitive bidding procurement practices. The report is filed as confidential in its entirety on the basis that it was prepared at the request of OPG Law Division for the purposes of providing legal advice, as set out in section 1.2 of the report. Additionally, the report discloses OPG's application of its internal procurement practices to third parties. It is therefore commercially sensitive and public disclosure could potentially result in harm to OPG, including financial harm. The report also includes commercially sensitive information relating to specific third parties. Similar commercially sensitive information was treated as confidential by the OEB in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses) and in OPG's previous applications, in EB-2013-0321 (Procedural Order No. 4) and EB-2016-0152 (Procedural Order No. 3).

c. Labour-Sensitive Information

Undertaking responses containing labour-sensitive information are being filed in Undertakings JT3.19, JT4.02, JTX4.15, JT4.14 Attachment 5, JT4.14 Attachment 11, JT4.13, JTX4.17, JTX4.18, and JTX4.19. OPG seeks confidential treatment of such information for the following reasons:

i. *Undertaking JT3.19:* Undertaking JT3.19 requests OPG to provide the debt amount used for each year over the IR term for Scenario E, which is the OPG proposed scenario for rate smoothing. OPG requests that the information with respect to pension liabilities and OPEB liabilities contained in its response to Undertaking JT3.19 be protected as confidential on the basis that it is labour-sensitive and consistent with information contained in the Aon Report for which the OEB granted confidential treatment in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence). OPG is seeking confidential treatment of the other redacted information in its response to Undertaking JT3.19 pursuant to its submissions in section (d) (Combined Regulated and Unregulated Assets and Business of OPG Information).

ii. *Undertakings JT4.02 and JTX4.15:* Undertaking JT4.02 requests OPG to supplement its response to Ex. L-D3-01-Society-006, part a) to include Kipling and Niagara information. Confidential treatment is sought for information relating to the expected date of termination of leases and information relevant to staff relocation because such information can directly relate to OPG's negotiations with the unions on issues pertaining to the implementation of these movements and, therefore, may influence future collective bargaining outcomes. Undertaking JTX4.15 contains information that is the same or substantially similar to the information proposed for redaction in OPG's response to Undertaking JT4.02. Similar labour-sensitive information was granted confidential treatment by the OEB in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses). Additionally, OPG also considers the information redacted in its response to Undertakings JT4.02 and JTX4.15 to be commercially-sensitive, as further described in Section (e) (Commercially-Sensitive Information with respect to Office Buildings and Leases).

iii. *Undertaking JT4.14, Attachments 5 and 11:* Undertaking JT4.14 requests OPG to provide audit reports listed in the revised list. The information proposed for redaction in these audits is sensitive and relates to certain employment and payroll practices and procedures. OPG requests that the redacted portions of Attachments 5 and 11 to Undertaking JT4.14 be protected as confidential because public disclosure of such information may give rise to potential employment and labour-related financial risk to OPG and may negatively impact OPG in a future proceeding or collective bargaining.

iv. *Undertakings JT4.13, JTX4.17, and JTX4.18:* Undertaking JT4.13 requests OPG to provide a response to questions regarding the total compensation envelope at median and impact on revenue requirement, with detailed calculations. The redacted portions of OPG's response to Undertaking JT4.13 include forecasts and projections relating to total remuneration and salary adjustments. Disclosure of such information could potentially interfere with future collective bargaining negotiations between OPG and the unions that represent its employees. The OEB granted confidential treatment for similar types of labour-sensitive information in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses and Decision on Confidentiality – Pre-Filed Evidence), and in EB-2016-0152. Undertaking JTX4.17 requests that OPG provide a more detailed explanation of the

analysis, including the calculations, from the 2019 Compensation Benchmarking Report prepared by Willis Towers Watson for OPG dated December 2020. OPG requests that the redacted portions of its response to this undertaking be protected as confidential as they contain labour-sensitive information, including projected year over year headcount changes and salary increases. The OEB granted confidential treatment for similar types of labour-sensitive information in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses). Undertaking JTX4.18 requests that OPG update the analysis to its response to Ex. L-F4-03-SEC-149 to include the impact of the Hydro One Shares and to provide detailed calculations. The redacted portions of OPG's response to Undertaking JTX4.18 include information indicative of forecasts and projections relating to total remuneration, salary, headcount reductions, and the number of employees receiving Hydro One share awards. Disclosure of such information, some of which the OEB has already granted confidential treatment of as part of Ex. L-F4-03-SEC-149, could interfere with future collective bargaining negotiations between OPG and the unions that represent its employees. The OEB granted confidential treatment for similar types of labour-sensitive information in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses and Decision on Confidentiality – Pre-Filed Evidence) and in EB-2016-0152.

v. *Undertaking JTX4.19:* Undertaking JTX4.19 requests OPG to advise how the Pickering closure will affect staff occupancy. OPG requests that the redacted portions of its response to this undertaking be protected as confidential because such information discusses OPG's estimated overall percentage of reduction to staffing levels post-Pickering shutdown. Similar labour-sensitive information was granted confidential treatment by the OEB in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses).

d. Combined Regulated and Unregulated Assets and Business of OPG Information

Undertaking JT3.19 requests OPG to provide the debt amount used for each year over the IR term for Scenario E, which is the OPG proposed scenario for rate smoothing. Undertaking JT3.20 requests OPG to specify which year(s) over the IR term for each scenario results in the lowest value. Part of OPG's response to Undertaking JT3.19 and OPG's entire response to Undertaking JT3.20 contain information reflecting the combined regulated and unregulated assets and business of OPG. This information should be protected as confidential because it discloses forward-looking information not on the public record regarding OPG's credit metrics which may provide indicative information related to the unregulated business' debt and cash flow expectations in a competitive environment. Similar requests for confidential treatment of such combined information were accepted by the OEB in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence), EB-2016-0152 (Procedural Order No. 3), and EB-2013-0321 (Procedural Order No.4). OPG also considers the redacted information relating to net pension and OPEB liabilities in its response to Undertaking JT3.19 to be labour-sensitive, as further described above in Section (c) (Labour-Sensitive Information).

e. Commercially-Sensitive Information with respect to Office Buildings and Leases

Undertaking responses containing commercially-sensitive information relating to OPG's office buildings and leases are filed in Undertakings JT2.33, JT4.02, JTX4.15 and JT2.30. OPG's response to Undertaking JT2.33 contains OPG's forecasts of annual savings from properties OPG intends to exit in the 2022 to 2028 period. OPG's responses to Undertakings JT4.02 and JTX4.15 contain information indicative of OPG's expected termination date for certain office leases. OPG's response to Undertaking JT2.30 contains forward-looking information regarding OPG's plans for

a specific office lease and includes information that may be indicative of the timing of the potential sale of certain of OPG's assets.

OPG requests that the redacted portions of the above-referenced undertaking responses relating to office buildings and leases be protected as confidential because they contain commercially sensitive information, the disclosure of which may significantly interfere with any future landlord-tenant lease negotiations. Additionally, public disclosure of the timing of any potential sale of OPG's assets may adversely affect OPG's commercial interests, including by signalling to potential buyers that OPG is a willing seller seeking to enter into a transaction within a discrete timeframe. Similar commercially-sensitive information was granted confidential treatment by the OEB in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses).

f. Clarington Corporate Campus Information

Undertaking JTX4.16 requests OPG to provide the numerator and denominator for the calculation in Ex. L-D3-01-Staff-176, subparts (c)(I) and (c)(II). The redacted portions of OPG's response to Undertaking JTX4.16 contain commercially sensitive information regarding the total capital costs, square footage, and $/FTE of the Clarington Corporate Campus project. Attachment 1 to Undertaking JT2.32 sets out the Clarington 2024-2026 asset service fee and theoretical revenue requirement calculations (including total depreciation, percentage allocated, total property tax, and various cost of capital values). Since OPG has not yet received a construction phase proposal for this project, disclosure of such information could prejudice OPG's competitive position and significantly interfere with its negotiations with its contractors and other third parties. This information is the same as or similar to other Clarington Corporate Campus information for which the OEB has granted confidential treatment in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence and Decision on Confidentiality – Interrogatory Responses).

The excel spreadsheet filed as Attachment 1 to Undertaking JT2.30 contains forecasts and underpinning assumptions supporting the calculation of NPV for Clarington Corporate Campus. This NPV amount is set out on page 6 of the Planning Phase Business Case Summary ("**BCS**") and was granted confidential treatment by the OEB, and therefore, the excel spreadsheet supporting its calculation should be redacted in its entirety (EB-2020-0290, Decision on Confidentiality – Pre-Filed Evidence).

Finally, Attachments 1 and 2 to Undertaking JT2.15 contain the same information as the Capital Projects Table located at Ex. D3-1-1, Tables 2a and 2b and Ex. D3-1-2 Table 5b from the Planning Phase BCS located at Ex. D3-1-2. The OEB approved confidential treatment of this information in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence).

g. Other

OPG's responses to Undertakings JT2.16 and JI1.1 contain confidential information that does not fit into the above categories.

i. *Undertaking JT2.16:* Undertaking JT2.16 requests OPG to provide information with respect to equipment codes and the corresponding criticality code for 130 motors from Project # 834380 – DN 4kV Motors Refurbishment and Replacement. This information should be protected as confidential because disclosure of this information could pose a potential threat for cyber-security attacks on equipment systems and the security of OPG's facilities.

ii. *Undertaking JI1.1:* Undertaking JI1.1 requests OPG to provide documentation related to OPG's reporting and record keeping filings for 2019 and 2020. OPG requests that Attachments 5, 12 and 14 filed in response to Undertaking JI1.1 be protected as confidential because they contain information regarding OPG's heavy water sales and processing, which is an unregulated business activity. Disclosure of such information, most of which the OEB has already granted confidential treatment of as part of Ex. L-H1-01-AMPCO-178, Attachment 1 and Ex. L-I1-01-SEC-159, Attachment 1, would prejudice OPG's competitive position and interfere significantly with any future negotiations being carried out by OPG. The OEB granted confidential treatment for similar types of heavy water sales information in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses), EB-2020-0152, EB-2016-0152, and EB-2013-0321.

A. Reasons for Confidential Treatment for Additional D2O Documents

Additionally, OPG requests confidential treatment of additional documents that were incorporated by reference in OPG's interrogatory responses related to the D2O Storage Project. In response to a request made on behalf of SEC, AMPCO, and CME, OPG has updated its responses to the following interrogatories to include additional documents:

I. Ex. L-D2-02-AMPCO-081, Attachments 3-5 and 7
II. Ex. L-D2-02-CME-019, Attachments 32-35, 37, and 40-42

OPG is requesting that these additional documents filed in response to these two interrogatories be protected as confidential because they contain commentary on the performance of contractors/vendors with respect to the D2O Storage Project. Disclosure of the redacted portions of these documents could prejudice the competitive position of the contractors/vendors involved, cause reputational harm to such contractors/vendors, and damage OPG's contractual relationships with these contractors/vendors. Furthermore, similar information was treated as confidential by the OEB in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses), EB-2013-0321, and EB-2010-0008. This specific information was also considered and approved as confidential in EB-2016-0152.

B. Reasons for Confidential Treatment for Revised Interrogatory Responses

As OPG advised at the outset of the Motions Day hearing, OPG is providing answers to the questions it had initially refused concerning certain assets in its response to Ex. L-D3-01-Society-007. OPG is requesting that this revised interrogatory response be protected as confidential since it contains labour-sensitive information regarding OPG's relocation to Clarington Corporate Campus. The information for which OPG requests confidential treatment includes information indicative of forecasts and projections relating to total headcount and plans for vacating certain office leases. This information includes estimates and underpinning assumptions that are labour-sensitive because they depend on, and/or may influence, collective bargaining outcomes. Consequently, disclosure of such information could potentially interfere with future collective bargaining negotiations between OPG and the unions that represent its employees. The OEB granted confidential treatment for similar types of labour-sensitive information in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence and Decision on Confidentiality – Interrogatory

Responses) and in EB-2016-0152. Additionally, some of the information for which OPG requests confidential treatment in its revised response to Ex. L-D3-01-Society-007 includes information related to the potential sale of certain OPG assets, including the timing of such sale and other forecasted financial information. Disclosure of such information may harm OPG's commercial interests and prejudice OPG in its negotiations with prospective purchasers of the property. Similar commercially-sensitive information was granted confidential treatment by the OEB in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses).

OPG also revised its response to Ex. L-A2-02-CCC-014 to provide Attachment 1. OPG is requesting that portions of Attachment 1 be protected as confidential because it discloses commercially sensitive information relating to OPG's total financial information, including indicative information related to the financial performance and financial position of OPG's unregulated business in a competitive environment.

C. Reasons for Confidential Treatment of the Day 4 Technical Conference Transcript

The OEB went *in camera* during the last part of Day 4 of the Technical Conference held on May 10, 2021. Pursuant to section 6.2.4 of the Practice Direction, OPG requests confidential treatment for the redacted portions of the Day 4 TC Transcript for the reasons set out below:

- Pg. 79-81 – The redacted information is the same as the external consulting fee information contained in Ex. L-A1-02-CCC-001, for which the OEB granted confidential treatment in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses).
- Pg. 83 – The redacted information constitutes the same capital costs information as in the Planning Phase BCS, for which the OEB granted confidential treatment of in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence and Decision on Confidentiality – Interrogatory Responses).
- Pg. 92 – The redacted information is the same downsizing costs information found on page 5 of the Amended 2020-2026 Business Plan. The OEB granted confidential treatment for this information in EB-2020-0290 (Decision on Confidentiality – Pre-Filed Evidence).
- Pg. 94 – The redacted information is the same or similar to other Clarington Corporate Campus information contained in Ex. L-D3-01-Staff-176 and OPG's response to Undertaking JTX4.16, for which OPG seeks confidential treatment (see Section (f) (Clarington Corporate Campus Information), above). The OEB granted confidential treatment of such Clarington Corporate Campus information in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses).
- Pg. 105-106 – The redacted information is the same or similar to Pickering closure costs information set out in OPG's response to Ex. L-F4-03-Staff-304, for which the OEB granted confidential treatment in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses).
- Pg. 107-108 – The redacted information is similar to information disclosed in OPG's response to Ex. L-D3-01-Society-007 related to the potential sale of a certain OPG asset, for which the OEB granted confidential treatment in EB-2020-0290 (Decision on Confidentiality – Interrogatory Responses).

As mentioned above, the foregoing materials are provided in the confidential, unredacted versions filed in Attachments 'A', 'B', 'C', and 'D'.

Should the OEB require any further information or clarification as to the requests made herein, please contact the Applicant's legal counsel as required.

Respectfully submitted,

Evelyn Wong

cc: Aimee Collier, OPG
Charles Keizer, Torys LLP
Crawford Smith (Lax O'Sullivan Lisus Gottlieb LLP)

APPENDIX 'A'

List of Affected Responses to Undertakings and Documents

1. Affected Responses to Undertakings

#	Undertaking
1.	JT2.16
2.	JT2.30
3.	JT2.33
4.	JT3.19
5.	JT3.20
6.	JT4.02
7.	JT4.13
8.	JTX4.15
9.	JTX4.16
10.	JTX4.17
11.	JTX4.18
12.	JTX4.19

2. Affected Documents Attached to Responses to Undertakings

#	Undertaking	Attachment #
13.	JT4.14	1
14.	JT4.14	2
15.	JT4.14	3
16.	JT4.14	5
17.	JT4.14	9
18.	JT4.14	11
19.	JT2.30	1
20.	JT2.32	1
21.	JT2.15	1
22.	JT2.15	2
23.	JI1.1	5
24.	JI1.1	12
25.	JI1.1	14

APPENDIX 'B'

List of Additional D2O Project Documents

1. Attachments to Interrogatory Responses

#	Exhibit	Attachment #
26.	L-D2-02-AMPCO-81	3
27.	L-D2-02-AMPCO-81	4
28.	L-D2-02-AMPCO-81	5
29.	L-D2-02-AMPCO-81	7
30.	L-D2-02-CME-19	32
31.	L-D2-02-CME-19	33
32.	L-D2-02-CME-19	34
33.	L-D2-02-CME-19	35
34.	L-D2-02-CME-19	37
35.	L-D2-02-CME-19	40
36.	L-D2-02-CME-19	41
37.	L-D2-02-CME-19	42

APPENDIX 'C'

List of Revised Interrogatory Responses and Revised Attachments to Interrogatory Responses

1. Revised Interrogatory Responses

#	Interrogatory Response
38.	L-D3-01-Society-007

2. Revised Attachments to Interrogatory Responses

#	Interrogatory Response
39.	L-A2-02-CCC-014

APPENDIX 'D'

List of Technical Conference Transcripts

#	Transcript
40.	Technical Conference Day 4 (May 10, 2021) Transcript