Board Staff Interrogatory #224

Interrogatory

Reference:
Exhibit F2 / Tab 2 / Schedule 1 / Table 1
Exhibit E2 / Tab 1 / Schedule 2 / Table 1b
Exhibit D2 / Tab 2 / Schedule 1 / p. 7

Preamble:

OPG's base OM&A costs are relatively flat over the 2022-2024 period (prior to the shutdown of Pickering NGS). OEB staff notes, however, that there are varying DRP-related planned outage days in those years.

Question(s):

a) Please confirm that the base OM&A costs exclude costs associated with the DRP.

b) Please confirm that the base OM&A costs include costs associated with planned outages (excluding outages for the DRP).

c) Please provide the monthly base OM&A costs for 2022-2026 attributable to Darlington NGS. Please discuss how the varying number of units being offline in a given month for refurbishment during the 2022-2026 Custom IR term has been reflected in the proposed base OM&A costs. For example, in 2022 there are 685 DRP-related planned outage days (reflecting that in some months two units are offline for refurbishment). While in 2023, there are 838 DRP-related planned outage days (reflecting that in some months three units are offline for refurbishment).

Response

a) OPG confirms that Base OM&A costs exclude costs associated with the DRP.

b) OPG confirms that Base OM&A costs do not include the incremental costs associated with planned outages, which are provided separately in Ex. F2-4-1 and Ex. F2-4-2 (and which exclude outage costs for DRP).

c) OPG's business planning process involves monthly OM&A detail being planned only for the first several years of a planning period. As such, Base OM&A costs

have been planned on a monthly basis up until 2022 and therefore monthly detail is not available for 2023-2026. The monthly costs for the 2022 plan are provided in Chart 1 below:

Chart 1

Nuclear Base OM&A - Darlington NGS by Function ($M)

Function	Plan - Calendar Year Ending December 31, 2022												
	Total	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**
Darlington													
Operations & Maintenance	**269.4**	25.8	20.8	20.4	25.8	20.2	20.2	25.9	20.8	20.9	26.2	21.0	21.4
- Operations	**92.0**	8.6	7.0	7.0	9.0	7.1	7.1	8.9	7.1	7.1	8.9	7.1	7.3
- Maintenance	**177.4**	17.2	13.8	13.3	16.7	13.2	13.2	17.1	13.7	13.8	17.3	13.9	14.1
Work Management	**13.1**	1.3	1.0	1.0	1.3	1.0	1.0	1.3	1.0	1.0	1.3	1.0	1.0
Site and Support Services	**46.7**	4.5	3.6	3.6	4.5	3.6	3.6	4.5	3.6	3.6	4.5	3.6	3.6
Tritium Removal Facility	**21.0**	2.0	1.6	1.6	2.1	1.6	1.6	2.0	1.6	1.6	2.0	1.6	1.7
Total Darlington NGS	**350.1**	33.5	27.0	26.6	33.6	26.4	26.4	33.7	27.0	27.1	33.9	27.2	27.7

Note that OPG plans and internally reports costs by fiscal month, rather than by calendar month. In 2022, there are five fiscal weeks in January, April, July and October, while there are four fiscal weeks in the other fiscal months. As a result, there is variability in the monthly costs shown.

The majority of costs associated with Darlington remain fixed during refurbishment as discussed in Ex. L-F2-02-Staff-230.