

NOV 13 2008

Regulatory Affairs & Corporate Strategic Planning

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ONTARIO ENERGY BOARD

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November 13, 2008

VIA RESS AND COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON
M4P 1E4

EB-2007-0905

OEB BOARD SECRETARY	
File No:	Sub File: 1
Panel	ak/cc
Licensing	RB
Other	ix
00/04	

Dear Ms. Walli:

EB-2007-0905 – Ontario Power Generation Inc. Draft Order for Payment Amounts for the Period April 1, 2008 – December 31, 2009

Attached is a draft rate order and supporting schedules for payment amounts for Ontario Power Generation's (OPG's) prescribed facilities. The draft rate order reflects the Board's November 3, 2008 Decision with Reasons in the EB-2007-0905 proceeding. The payment amounts are effective April 1, 2008 and are to be implemented by the Independent Electricity System Operator on December 1, 2008.

Also attached is a summary of the Decision with Reasons to assist parties in cross-referencing specific decisions to the schedules associated with the draft rate order.

OPG has provided a draft rate order consistent with the findings in the Decision in accordance with the Board's direction. However, there are certain findings in the Decision which OPG continues to review. This draft rate order is being provided without prejudice to all OPG's rights of rehearing, review, petition and appeal.

If you have any questions regarding this submission, please contact me at 416-592-4463.

Yours truly,

A handwritten signature in blue ink, appearing to read 'A. Barrett', with a stylized, flowing script.

Andrew Barrett

Attach.

cc: Michael Penny (Torys) via e-mail
EB-2007-0905 Intervenors via e-mail

ATTACHMENT
EB-2007-0905 SUMMARY OF BOARD DECISION WITH REASONS

Decision Chapter / Section	Pg	Application Issue	Board Decision	Schedule Reference
2	NUCLEAR			
2.1	18	Nuclear production forecast	Approved	App C-T1
2.2	31	Nuclear OM&A costs	Disallow 10% (\$35.0M) of Pickering A base OM&A, otherwise allow OPG's OM&A forecast for test period	App A-T2, Note 4
			OPG directed to produce further benchmarking studies	N/A
2.3	33	Nuclear advertising costs	Disallow \$2.3 million of test period costs	App A-T2, Note 4
2.4	33	Nuclear fuel costs	Approved	App A-T2
			Approved nuclear fuel cost variance account as proposed by OPG	App F
2.5	35	Nuclear capital expenditures (other than refurbishment and new build)	Approved	N/A
			Provide a more detailed analysis of the treatment of Pickering 2 & 3 isolation costs	N/A
			Provide business case summaries supporting capital expenditures in next application	N/A
2.6	38	Nuclear refurbishment and new build	OM&A costs approved	App A-T2
2.7	38	Other nuclear revenues	Approved	App A-T2
3	HYDROELECTRIC			
3.1	40	Hydroelectric production forecast	Approved	App B-T1
3.2	41	Hydroelectric operating costs	Approved	App A-T1
3.3	44	Hydroelectric capital expenditures	Accept inclusion of Sir Adam Beck G7 frequency conversion project cost in rate base	App AT-1
			Beck G7 and Niagara Tunnel projects fall within scope of Section 6(2)4 of O. Reg 53/03	N/A
			Balance of hydroelectric capital budget approved	N/A

Decision Chapter / Section	Pg	Application Issue	Board Decision	Schedule Reference
3.4.1	45	Other hydroelectric revenues - ancillary services	Approved	App A-T1
3.4.2	49	Other hydroelectric revenues - segregated mode of operation and water transactions	Include the average net revenue over last three years as a revenue offset in each year of the test period, with incremental revenue accruing to OPG	App A-T1, Note 5
3.4.3	50	Other hydroelectric revenues - congestion management settlement credit ("CMSC") payments	Approved treatment proposed by OPG	App A-T1
3.5	55	Hydroelectric incentive mechanism	Approved hydroelectric incentive mechanism proposed by OPG	Draft Order section 3
			Present a review of the mechanism at the next proceeding	N/A
4	CORPORATE COSTS			
4.1	60	Corporate cost allocation methodology	Coat allocation methodology and allocated costs approved	N/A
			Present another independent evaluation at next application	N/A
4.2	62	Corporate costs – Regulatory Affairs	Approved	App A-T1; App A-T2
5	NUCLEAR WASTE MANAGEMENT AND DECOMMISSIONING			
5.3.2	90	Method of recovering the costs of nuclear liabilities of prescribed facilities (Pickering and Darlington)	The return on a portion of the rate base be the average accretion rate on OPG's nuclear liabilities, which is currently 5.6%. That portion of rate base that attracts that return will be equal to the lesser of: (i) the forecast amount of the average unfunded nuclear liabilities related to Pickering and Darlington, and (ii) the average unamortized ARC included in the fixed asset balances for Pickering and Darlington	App A-T2, App A-T4, App A-T5
	88		Depreciation expense includes depreciation of the ARC in the net book value of fixed assets	App A-T2
5.3.3	98	Transitional Nuclear Liability Deferral Account - Section 5.1 of O. Reg. 53/05	Approved as proposed	App F
6	BRUCE NUCLEAR STATIONS:			

Decision Chapter / Section	Pg	Application Issue	Board Decision	Schedule Reference
6	110	Use of rate base method to calculate Bruce test period costs	Not approved Recalculate the test period net revenue from Bruce in accordance with GAAP and include an income tax (PILS) provision, calculated in accordance with GAAP	App A-T7
	112	O. Reg 53/05 requires OEB to ensure that OPG recovers all of its Bruce costs, including nuclear liabilities	Establish a variance account to capture differences between forecast and actual revenues and costs from Bruce	App F
7	DEFERRAL AND VARIANCE ACCOUNTS			
7.1	Existing Nuclear Accounts			
7.1.1	115	Recovery of Pickering A Return to Service Deferral Account	Approved amount Rejected proposed amortization period. Recovery approved over shorter time period of April 2008 – Dec 2011	App D-T1, App F
7.1.2	116	Recovery of Nuclear Liability Deferral Account, Transition.	Approved	App D-T1, App F
7.1.3	117	Recovery of Nuclear Development Deferral Account, Transition – new facilities	Approved	App D-T1, App F
7.1.4	120	Recovery of Nuclear Development Deferral Account, Transition – capacity refurbishment	Not approved	App A-T2, App D-T1
7.1.5	120	Recovery of Ancillary Services Net Revenue, Nuclear and Transmission Outages and Restrictions Variance Accounts	Approved	App D-T1, App F
7.2	Existing Hydroelectric Accounts			
	121	Recovery of Hydroelectric Water Conditions and Ancillary Services Net Revenue, Hydroelectric Variance Accounts	Approved	App F
	122	Sharing of profits from Segregated Mode of Operations and Water Transfer Deferral Accounts	Not approved	App A-T1
7.3	Test Period Deferral and Variance Accounts			

Decision Chapter / Section	Pg	Application Issue	Board Decision	Schedule Reference
7.3.1	123	Continuation of existing deferral and variance accounts: <ul style="list-style-type: none"> • Pickering A Return to Service • Nuclear Liability • Nuclear Development • Hydroelectric Water Conditions • Ancillary Services Net Revenue, Hydroelectric and Nuclear • Capacity Refurbishment 	Approved Nuclear liability account restricted to impact of changes in nuclear liabilities related to Pickering and Darlington]	App F
7.3.2	New Accounts Proposed by OPG			
	126	Nuclear Fuel Cost Variance Account	Approved	App F
	127	Segregated Mode of Operation and Water Transactions Variance Account	Not approved	N/A
	127	Pension Interest Rate Variance Account	Not approved	N/A
	128 – 129	Income and Other Taxes Variance Account	Approved OPG to calculate the income tax provision, before any tax loss carry forwards, resulting from revenue requirement determined in accordance with the Decision	App F
7.4	130	Accrue interest on account balances at forecast rate for long term debt and WAAC	Not approved Accrue interest using interest rates set by Board from time to time.	App F
8	RATE BASE AND COST OF CAPITAL			
8.1	133	Proposed rate base	Approved. Return on that portion of rate base associated with the unfunded nuclear liabilities and unamortized asset retirement costs for Pickering and Darlington is 5.6%, the balance receives the weighted average cost of capital	App A-T1, App A-T2, App A-T4, App A-T5

Decision Chapter / Section	Pg	Application Issue	Board Decision	Schedule Reference
8.3.5	149	Proposed capital structure: 42.5% Debt / 57.5% Equity	Not approved Approved Ratio of 53% debt / 47% equity	App A-T4, App A-T5
8.4.3 & 8.4.4	158	Proposed return on equity of 10.5%.	Not approved Approved ROE of 8.65%	App A-T4, App A-T5
8.4.5	161	Separate costs of capital for nuclear and hydroelectric	The Board concludes that this is an approach worthy of further investigation in OPG's next proceeding	N/A
8.4.6	162	Proposed formula to adjust ROE by 0.75% for every 1.0% change in Long Canada Bond forecast	Approved	N/A
8.5	Cost of Debt			
8.5.1	162	Proposed forecast cost of short-term debt	Approved	App A-T4 App A-T5
8.5.2	164	Proposed forecast cost of long-term debt	Approved for existing and planned debt Cost of long-term "other" debt 5.63% for 2008 and 6.16% for 2009.	App A-T4 App A-T5
	165		Calculate impact of Board treatment of unfunded nuclear liabilities for Pickering and Darlington on allocation of existing long-term debt and the level of "other" long-term debt.	App A-T4 App A-T5
9	DESIGN AND DETERMINATION OF PAYMENT AMOUNTS			
9.1	171	Tax losses and rate mitigation	OPG should not include in calculation of revenue requirement any tax provision for 2008 and 2009 in respect of the prescribed assets	App A-T1, App A-T2
			Provide mitigation equal to 22% of the revenue deficiency calculated based on the Board's findings in this decision.	App A-T3

Decision Chapter / Section	Pg	Application Issue	Board Decision	Schedule Reference
			File improved information on forecast test period income tax in next application. Tax provision in future applications to exclude any income or loss in respect of the Bruce lease. File an analysis of prior period tax returns identifying all items that should be taken into account in the tax provision for prescribed facilities.	N/A
	172		In next application, file audited financial statements for the prescribed facilities, as at year end December 31, 2008.	N/A
9.2.1	173	Nuclear payment structure - 25% fixed payment	Not approved <i>Continue the current 100% variable payment schedule for nuclear output.</i>	App C-T1
	174	Proposed nuclear payment structure – separate payment rider for deferral and variance account clearance	Approved	App D-T1
9.3	175	Proposed hydroelectric payment structure	Approved No separate rider for recovery of deferral and variance accounts	App B-T1
10	IMPLEMENTATION			
	177	April 1, 2008 effective date and recovery of shortfall from April 1 to implementation date over balance of test period	Approved Implementation date December 1, 2008	App E-T1, App E-T2, App E-T3
	177	Rate order	Draft rate order using monthly production forecasts for April 1 – November 30 which underpinned application. File by November 13, 2008.	Draft Order, App E-T1, App E-T2, App E-T3

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B

AND IN THE MATTER OF an application by Ontario Power Generation Inc. pursuant to section 78.1 of the *Ontario Energy Board Act, 1998* for an Order or Orders determining payment amounts for the output of certain of its generating facilities.

BEFORE: Gordon Kaiser
Presiding Member & Vice Chair

Cynthia Chaplin
Member

Bill Rupert
Member

DRAFT RATE ORDER
November 13, 2008

Ontario Power Generation Inc. ("OPG", or the "Applicant") filed an Application dated November 30, 2007 with the Ontario Energy Board (the "Board") under section 78.1 of the Ontario Energy Board Act; S.O. 1998, c. 15, Sched. B (the "Act") for an order or orders approving the payment amounts for generating facilities prescribed under Ontario Regulation 53/05 ("O. Reg. 53/05"), as amended, for the period from April 1, 2008 through December 31, 2009 (the "test period"). The Board assigned file number EB-2007-0905 to the Application.

On February 7, 2008, the Board heard a Motion by OPG for i) an order declaring OPG's current payment amounts interim, effective April 1, 2008 and ii) an interim order increasing OPG's payment amounts on an interim basis. The Board granted OPG's

request to declare its current payment amounts interim, effective April 1, 2008 and denied its request for an interim increase in payment amounts.

The Board held an oral hearing on OPG's Application and issued a Decision with Reasons on November 3, 2008. The Decision directed OPG to file a draft order including the final revenue requirement and payment amounts for the prescribed nuclear and hydroelectric facilities that reflect the findings made by the Board in its Decision. With respect to the calculation of payment amounts, the Board indicated that OPG should assume that the Independent Electricity System Operator (the "IESO") would start billing the new payment amounts as of December 1, 2008 and that the payment amounts would be adjusted through the use of a payment rider to allow for the recovery of the 21 month revenue requirement over the period December 1, 2008 to December 31, 2009.

The Board directed OPG to revise its calculation of the forecast net revenues related to OPG's lease of the Bruce nuclear facilities to reflect the findings in the Decision and to establish a variance account to capture differences between (i) the forecast cost and revenues related to Bruce that are factored into the test period payment amounts for Pickering and Darlington, and (ii) OPG's actual revenues and costs in respect of Bruce.

The Board also directed OPG to calculate the test period income tax provision, before consideration of any tax loss carry-forwards, consistent with the revenue requirement determined in accordance with the Decision, to establish a benchmark to measure variations in taxes during the test period for the purposes of the approved tax variance account.

The Board directed that the return on a portion of the rate base be limited to the average accretion rate on OPG's nuclear liabilities, which is currently 5.6%. That portion of the rate base that attracts that return is equal to the lesser of: (i) the forecast amount of the average unfunded nuclear liabilities related to the Pickering and Darlington facilities, and (ii) the average unamortized asset retirement costs included in the fixed asset balances for Pickering and Darlington. The Board directed OPG to provide a test period forecast of the average unfunded nuclear liabilities related to Pickering and Darlington for the purposes of this determination.

The Board therefore orders that:

1. The test period revenue requirement is \$1,153.4M for the prescribed hydroelectric facilities and \$4,850.9M for the prescribed nuclear facilities, as set out in Appendix A. These revenue requirements shall form the basis of the payment amounts, including the authorized payment riders.
2. Effective April 1, 2008 and subject to section 3, for the prescribed hydroelectric facilities, the payment amount is \$36.66/MWh, as set out in Appendix B, plus the payment rider set out in section 7.

3. a) For the period April 1, 2008 – November 30, 2008, if the total combined output of the prescribed hydroelectric facilities exceeds 1,900 megawatt hours in any hour, the hydroelectric payment amount applies to output from the prescribed facilities up to 1,900 MWh in any hour and production over 1,900 MWh in any hour receives the market price from the IESO-administered energy market determined under the market rules.

b) For the period after December 1, 2008, the hydroelectric payment amount applies to the average hourly net energy production in megawatt hours from the prescribed hydroelectric facilities in any given month (the “hourly volume”) for each hour of that month. Net energy production over the hourly volume that is supplied into the IESO-administered energy market will receive the market price, calculated on a five minute basis. Where net energy production from the regulated hydroelectric facilities that is supplied into the IESO-administered energy market is less than the hourly volume, OPG’s revenues will be adjusted by the difference between the hourly volume and the actual net energy production that is supplied into the IESO-administered energy market at the market price, calculated on a five minute basis.
4. Effective April 1, 2008, for the prescribed nuclear facilities, the payment amount is \$52.98/MWh, as set out in Appendix C, plus the payment riders set out in sections 5 and 6.
5. Effective April 1, 2008, for the prescribed nuclear facilities, the nuclear payment rider A for the amortization of approved variance and deferral account balances is \$2.00/MWh, as set out in Appendix D.
6. Effective December 1, 2008, for the prescribed nuclear facilities, the nuclear payment rider B is \$2.15/MWh and the nuclear payment rider C is \$1.23/MWh, as set out in Appendix E. Nuclear payment rider B provides for the recovery of the difference between interim payment amounts and \$52.98/MWh for the period April 1, 2008 to November 30, 2008. Nuclear payment rider C provides for the recovery of nuclear payment rider A for the period April 1, 2008 to November 30, 2008.
7. Effective December 1, 2008, for the prescribed hydroelectric facilities, the hydroelectric payment rider is \$2.08/MWh, as set out in Appendix E. The hydroelectric payment rider provides for the recovery of the difference between interim payment amounts and \$36.66/MWh for the period April 1, 2008 to November 30, 2008. This payment rider will be applied to the hourly volumes as set out in section 3 b).
8. The IESO shall make payments to OPG in accordance with this order as of December 1, 2008. The IESO shall collect the difference between the interim payment amounts and the approved payment amounts from each wholesale

customer based on that customer's historical actual load consumption for the period between April 1, 2008 and November 30, 2008.

9. OPG shall recover the balances in the following variance and deferral accounts in accordance with Appendix F:

- Hydroelectric Water Conditions Variance Account
- Ancillary Services Net Revenue Variance Account
- Transmission Outages and Restrictions Variance Account
- Pickering A Return to Service Deferral Account
- Nuclear Liability Deferral Account, Transition
- Nuclear Development Deferral Account, Transition

10. OPG shall maintain the following variance and deferral accounts in accordance with Appendix F:

- Hydroelectric Water Conditions Variance Account
- Ancillary Services Net Revenue Variance Account
- Pickering A Return to Service Deferral Account
- Nuclear Liability Deferral Account
- Nuclear Development Variance Account

11. OPG shall establish the following variance and deferral accounts in accordance with Appendix F:

- Capacity Refurbishment Variance Account
- Nuclear Fuel Cost Variance Account
- Income and Other Taxes Variance Account
- Bruce Lease Net Revenues Variance Account

DATED at Toronto _____, 2008

ONTARIO ENERGY BOARD

Kirsten Walli
Board Secretary

EB-2007-0905 DRAFT RATE ORDER APPENDICES

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APPENDIX C: NUCLEAR PAYMENT AMOUNT

Table 1	Nuclear Payment Amount
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APPENDIX F: VARIANCE AND DEFERRAL ACCOUNTS

Numbers may not add due to rounding.

Draft Rate Order
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Appendix A
Table 1

Table 1
Summary of Regulated Hydroelectric Revenue Requirement (\$M)

Line No.	Description	Note	April 1 to December 31, 2008			January 1 to December 31, 2009			Total		
			OPG Proposed	Board Adjust	Board Approved	OPG Proposed	Board Adjust	Board Approved	OPG Proposed	Board Adjust	Board Approved
			(a) Note 1	(b)	(c)	(d) Note 1	(e)	(f)	(g) Note 1	(h)	(i)
	Rate Base										
1	Net Fixed Assets		3,857.8	0.0	3,857.8	3,847.5	0.0	3,847.5	N/A	N/A	N/A
2	Working Capital		0.6	0.0	0.6	0.6	0.0	0.6	N/A	N/A	N/A
3	Cash Working Capital		21.8	0.0	21.8	21.8	0.0	21.8	N/A	N/A	N/A
4	Total Rate Base		3,880.2	0.0	3,880.2	3,869.9	0.0	3,869.9	N/A	N/A	N/A
	Capitalization										
5	Short-term Debt	2	99.4	16.7	116.1	99.6	15.9	115.5	N/A	N/A	N/A
6	Long-Term Debt	2	1,549.7	390.8	1,940.5	1,545.0	390.4	1,935.5	N/A	N/A	N/A
7	Common Equity	2	2,231.1	(407.4)	1,823.7	2,225.2	(406.3)	1,818.8	N/A	N/A	N/A
8	Nuclear Liabilities	2	0.0	0.0	0.0	0.0	0.0	0.0	N/A	N/A	N/A
9	Total Capital		3,880.2	(0.0)	3,880.2	3,869.9	(0.0)	3,869.9	N/A	N/A	N/A
	Cost of Capital										
10	Short-term Debt	3	5.8	0.9	6.7	6.0	0.9	6.9	11.8	1.9	13.6
11	Long-Term Debt	3	65.4	17.8	83.2	91.5	22.5	113.9	156.9	40.3	197.1
12	Return on Equity	3	175.7	(57.4)	118.3	233.6	(76.3)	157.3	409.3	(133.7)	275.7
13	Nuclear Liabilities	3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
14	Total Cost of Capital		246.9	(38.6)	208.3	331.1	(52.9)	278.2	578.0	(91.5)	486.4
	Expenses										
15	OM&A		93.1	0.0	93.1	119.0	0.0	119.0	212.1	0.0	212.1
16	Fuel and GRC		179.9	0.0	179.9	244.1	0.0	244.1	424.0	0.0	424.0
17	Depreciation & Amortization	4	45.9	6.9	52.8	61.6	9.3	70.9	107.5	16.2	123.7
18	Property and Capital Taxes		6.5	0.0	6.5	8.7	0.0	8.7	15.2	0.0	15.2
19	Total Expenses		325.4	6.9	332.3	433.3	9.3	442.6	758.7	16.2	774.9
	Less:										
	Other Revenues										
20	Bruce Lease Revenues Net of Direct Costs		N/A		N/A	N/A		N/A	N/A	0.0	N/A
21	Ancillary and Other Revenue	5	24.3	10.1	34.4	33.1	13.5	46.6	57.4	23.6	81.0
22	Total Other Revenues		24.3	10.1	34.4	33.1	13.5	46.6	57.4	23.6	81.0
23	Income Tax		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
24	Revenue Requirement before Mitigation		548.0	(41.8)	506.2	731.3	(57.1)	674.2	1,279.3	(98.9)	1,180.4

For notes see Table 1a.

Numbers may not add due to rounding.

Draft Rate Order
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Appendix A
Table 1a

Table 1a
Notes to Table 1
Summary of Regulated Hydroelectric Revenue Requirement (\$M)

Notes:

- 1 Agrees to Exhibit K1-T1-S1 Tables 1 and 2 - Summary of Revenue Requirement for April to December of 2008, and January 1, 2009 to December 31, 2009.
- 2 Capitalization for OPG's combined regulated operations is provided in Draft Rate Order App A Table 4 for April 1 to December 31, 2008 and Draft Rate Order App A Table 5 for January 1, 2009 to December 31, 2009. The Board determined that a portion of OPG's rate base will earn a return limited to the average accretion rate on OPG's nuclear liabilities. Draft Rate Order App A Tables 4 and 5 identify that portion of rate base. The remaining rate base is financed with 53% debt and 47% equity as determined by the Board. The impact on capital structure is provided in Draft Rate Order App A Tables 4 and 5. These resulting capital structure amounts are allocated to regulated hydroelectric and nuclear based on their relative rate base amounts. OPG has directly assigned the portion of rate base financed at the average accretion rate to its nuclear operations; therefore the allocation of the remaining capital structure components must be revised to reflect the change in the nuclear rate base:

			Apr to Dec	
			<u>2008</u>	<u>2009</u>
Approved reg. hydroelectric rate base	(a)	App A Table 1 Line 4	3,880.2	3,869.9
Approved nuclear rate base	(b)	App A Table 2 Line 4	3,509.1	3,483.8
Financing directly assigned to nuclear rate base	(c)	App A Table 2 Line 8	(1,060.3)	(1,012.9)
Nuclear rate base financed by capital structure	(d) = (b) - (c)		2,448.8	2,470.9
Reg. hydroelectric allocation	(e) = (a) / ((a) + (d))		61.31%	61.03%
Nuclear allocation	(f) = (d) / ((a) + (d))		38.69%	38.97%

- 3 Cost of capital for OPG's combined regulated operations is provided in Draft Rate Order App A Tables 4 and 5. The cost of capital is allocated between regulated hydroelectric and nuclear operations consistent with the capital structure allocation described in Note 2 above.

4 **Description of Adjustment to Amortization Expense**

Remove revenue sharing from SMO transactions prior to OEB regulation in accordance with OEB Decision

Apr to Dec		
<u>2008</u>	<u>2009</u>	<u>Total</u>
6.9	9.3	16.2

5 **Description of Adjustment to Other Revenues**

Inclusion of SMO revenues for test period per OEB Decision
Inclusion of Water Transfer revenues for test period per OEB Decision
Total OM&A Adjustments

Apr to Dec		
<u>2008</u>	<u>2009</u>	<u>Total</u>
4.9	6.6	11.5
5.2	6.9	12.1
10.1	13.5	23.6

Numbers may not add due to rounding.

Draft Rate Order
EB-2007-0905
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Appendix A
Table 2

Table 2
Summary of Nuclear Revenue Requirement (\$M)

Line No.	Description	Note	April 1 to December 31, 2008			January 1 to December 31, 2009			Total		
			OPG Proposed	Board Adjust	Board Approved	OPG Proposed	Board Adjust	Board Approved	OPG Proposed	Board Adjust	Board Approved
			(a) Note 1	(b)	(c)	(d) Note 1	(e)	(f)	(g) Note 1	(h)	(i)
	Rate Base										
1	Net Fixed Assets		2,787.7	0.0	2,787.7	2,696.0	0.0	2,696.0	N/A	N/A	N/A
2	Working Capital		705.4	0.0	705.4	771.8	0.0	771.8	N/A	N/A	N/A
3	Cash Working Capital		16.0	0.0	16.0	16.0	0.0	16.0	N/A	N/A	N/A
4	Total Rate Base		3,509.1	0.0	3,509.1	3,483.8	0.0	3,483.8	N/A	N/A	N/A
	Capitalization										
5	Short-term Debt		89.9	(16.7)	73.2	89.7	(15.9)	73.8	N/A	N/A	N/A
6	Long-Term Debt	2	1,401.4	(176.8)	1,224.6	1,390.9	(155.1)	1,235.8	N/A	N/A	N/A
7	Common Equity	2	2,017.7	(866.8)	1,150.9	2,003.2	(841.9)	1,161.4	N/A	N/A	N/A
8	Nuclear Liabilities	2	0.0	1,060.3	1,060.3	0.0	1,012.9	1,012.9	N/A	N/A	N/A
9	Total Capital		3,509.1	(0.0)	3,509.1	3,483.8	0.0	3,483.8	N/A	N/A	N/A
	Cost of Capital										
10	Short-term Debt	3	5.2	(0.9)	4.3	5.4	(1.0)	4.4	10.6	(1.9)	8.7
11	Long-Term Debt	3	59.2	(6.7)	52.5	82.4	(9.6)	72.8	141.6	(16.3)	125.3
12	Return on Equity	3	158.9	(84.2)	74.7	210.3	(109.9)	100.5	369.2	(194.1)	175.1
13	Nuclear Liabilities	3	0.0	44.5	44.5	0.0	56.7	56.7	0.0	101.2	101.2
14	Total Cost of Capital		223.3	(47.4)	175.9	298.1	(63.7)	234.3	521.4	(111.1)	410.3
	Expenses										
15	OM&A	4	1,662.7	(15.9)	1,646.8	2,168.7	(21.4)	2,147.3	3,831.4	(37.3)	3,794.1
16	Fuel and GRC		125.7	0.0	125.7	204.2	0.0	204.2	329.9	0.0	329.9
17	Depreciation & Amortization	5	277.2	19.6	296.8	388.9	26.4	415.3	666.1	46.0	712.1
18	Property and Capital Taxes		16.3	0.0	16.3	22.0	0.0	22.0	38.3	0.0	38.3
19	Total Expenses		2,082.0	3.7	2,085.7	2,783.8	5.0	2,788.8	4,865.8	8.7	4,874.5
	Less:										
	Other Revenues										
20	Bruce Lease Revenues Net of Direct Costs	6	51.8	28.2	80.0	82.6	29.3	111.9	134.4	57.5	191.9
21	Ancillary and Other Revenue		49.4	0.0	49.4	50.9	0.0	50.9	100.3	0.0	100.3
22	Total Other Revenues		101.2	28.2	129.4	133.4	29.3	162.7	234.6	57.5	292.1
23	Income Tax		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
24	Revenue Requirement before Mitigation		2,204.1	(71.8)	2,132.3	2,948.4	(88.0)	2,860.4	5,152.5	(159.9)	4,992.6

For notes see Table 2a.

Numbers may not add due to rounding.

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Appendix A
Table 2a

Table 2a
Notes to Table 2
Summary of Nuclear Revenue Requirement (\$M)

Notes:

- 1 Agrees to Exhibit K1-T1-S1 Tables 1 and 2 - Summary of Revenue Requirement for April to December of 2008, and January 1, 2009 to December 31, 2009.
- 2 Capitalization for OPG's combined regulated operations is provided in Draft Rate Order App A Table 4 for April 1 to December 31, 2008 and Draft Rate Order App A Table 5 for January 1, 2009 to December 31, 2009. The capital structure is allocated between regulated hydroelectric and nuclear consistent with the capital structure allocation described in Draft Rate Order App A Table 1a, Note 2. The resulting allocation ratios for nuclear operations are:
Nuclear allocation for April 1, 2008 to December 31, 2008 is: 38.69%
Nuclear allocation for January 1, 2009 to December 31, 2009 is: 38.97%
- 3 Cost of capital for OPG's combined regulated operations is provided in Draft Rate Order App A Tables 4 and 5. The cost of capital is allocated between regulated hydroelectric and nuclear consistent with the capital structure allocation described in Draft Rate Order App A Table 1a, Note 2

4 **Description of Adjustment to OM&A Expense**

Pickering A reduction of 10% to base OM&A budget
Nuclear advertising
Total Adjustment

Apr to Dec		
<u>2008</u>	<u>2009</u>	<u>Total</u>
(14.9)	(20.1)	(35.0)
(1.0)	(1.3)	(2.3)
<u>(15.9)</u>	<u>(21.4)</u>	<u>(37.3)</u>

5 **Description of Adjustment to Amortization Expense**

Reduced PARTS recovery period
(Draft Rate Order App D, Line 1 column (f) - (c))
Remove test period amortization of Pickering B refurbishment costs incurred prior to OEB regulation
(Test period amortization = (\$16.2M total recovery amount per OEB Decision x 33 month proposed amortization period) / 21 month test period)
Total Adjustment

Apr to Dec		
<u>2008</u>	<u>2009</u>	<u>Total</u>
24.0	32.4	56.4
(4.4)	(6.0)	(10.4)
<u>19.6</u>	<u>26.4</u>	<u>46.0</u>

- 6 See Draft Rate Order App A Table 7 for details of the adjustment.

Numbers may not add due to rounding.

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Appendix A
Table 3

Table 3
Summary of Approved Revenue Deficiency by Technology (\$M)
Test Period April 1, 2008 to December 31, 2009

Line No.	Description	Regulated Hydroelectric			Nuclear			Total Test Period
		2008 (Apr 1-Dec 31)	2009 (Jan 1-Dec 31)	Total	2008 (Apr 1-Dec 31)	2009 (Jan 1-Dec 31)	Total	
		(a)	(b)	(c)	(d)	(e)	(f)	(g)
1	Forecast Production (TWh) ¹	12.9	18.5	31.5	38.3	49.9	88.2	N/A
2	Prescribed Payment Amount (\$/MWh) ²	33.0	33.0	33.0	49.5	49.5	49.5	N/A
3	Indicated Production Revenue (\$M) ³ (line 1 * line 2)	427.1	611.1	1,038.1	1,897.7	2,470.2	4,367.9	5,406.0
4	Approved Revenue Requirement Before Mitigation (\$M) ³	506.2	674.2	1,180.4	2,132.3	2,860.4	4,992.6	6,173.0
5	Revenue Deficiency Before Mitigation (\$M) (line 4 - line 3)	79.1	63.1	142.2	234.6	390.2	624.7	767.0
6	Mitigation Prescribed By OEB: 22% of Revenue Deficiency ³	11.6	15.4	27.0	60.7	81.0	141.7	168.6
7	Revenue Deficiency After Mitigation (\$M) (line 5 - line 6)	67.5	47.7	115.2	173.9	309.2	483.0	598.4
8	Revenue Requirement Reflected In Approved Payment Amounts (line 4 - line 6)	494.6	658.8	1,153.4	2,071.6	2,779.4	4,850.9	6,004.4

Notes:

- 1 EB-2007-0905 Ex. A1-T3-S1 Table 3
- 2 From Draft Rate Order App A Table 1 (Reg. Hydro) and Draft Rate Order App A Table 2 (Nuclear)
- 3 Mitigation determined as 22% of total revenue deficiency allocated to equalize payment amount increase between Nuclear and Regulated Hydroelectric:

	Reg. Hydro	Nuclear	Total
	27.0	141.7	168.6
2008 Portion: 9 months / 21 months	11.6	60.7	72.3
2009 Portion: 12 months / 21 months	15.4	81.0	96.4
Total Allocated by Technology	27.0	141.7	168.7

Numbers may not add due to rounding.

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Appendix A
Table 4a

Table 4a
Summary of Changes in Capitalization and Cost of Capital: April 1, 2008 to December 31, 2008
OPG Proposed (\$M)

Line No.	Note	Capitalization	Principal (\$M)	Component (%)	Cost Rate (%)	Cost of Capital (\$M)
			(a)	(b)	(c)	(d)
			Note 1		Note 2	Note 3
		Capitalization and Return on Capital:				
1		Short-term Debt	189.3	2.6%	5.83%	11.0
2		Existing/Planned Long-Term Debt	2,197.2	29.7%	5.79%	95.4
3	4	Other Long-Term Debt Provision	753.9	10.2%	5.65%	29.2
4	5	Total Debt	3,140.4	42.5%	N/A	135.6
5	5	Common Equity	4,248.9	57.5%	10.50%	334.6
6	6	Rate Base	7,389.3	100%	N/A	470.3

Notes:

- Capital components referenced at EB-2007-0905 Ex K1-T1-S1 Table 1, lines 5, 6 and 7 of column (g).
- Cost rate (column (c)) for capital components is provided as per EB-2007-0905 Ex. C1-T2-S1 Table 3; however, cost of capital (column (d)) is only for 9 months.
- Cost of capital referenced at EB-2007-0905 Ex K1-T1-S1 Table 1, lines 9, 10 and 11 of column (g).
Principal (column (a)) * Cost Rate (column (c)) prorated for April 1, 2008 to December 31, 2008 period.
- Debt required to balance capital structure with proposed rate base. See EB-2007-0905 Ex. C1-T2-S2, Table 5b for interest rate calculation.
- Capital structure and return on equity proposal per EB-2007-0905 Ex. C1-T2-S1. The typical calculation for total debt (cost of capital / total debt) is not applicable.
- Rate base referenced at EB-2007-0905 Ex K1-T1-S1 Table 1, line 4, column (g). The typical calculation for rate base (cost of capital / rate base) is not applicable.

Numbers may not add due to rounding.

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Appendix A
Table 4b

Table 4b
Summary of Changes in Capitalization and Cost of Capital: April 1, 2008 to December 31, 2008
Board Approved (\$M)

Line No.	Note	Capitalization	Principal (\$M)	Component (%)	Cost Rate (%)	Cost of Capital (\$M)
			(a)	(b)	(c)	(d)
					Note 1	
		Capitalization and Return on Capital:				
1	2	Short-term Debt	189.3	3.0%	5.83%	11.0
2	3	Existing/Planned Long-Term Debt	2,092.0	33.1%	5.79%	90.4
3	4	Other Long-Term Debt Provision	1,073.1	17.0%	5.63%	45.3
4	5	Total Debt	3,354.4	53.0%	5.76%	146.7
5	5	Common Equity	2,974.6	47.0%	8.65%	193.0
6	6	Rate Base Financed by Capital Structure	6,329.0	85.7%	N/A	339.7
7	6	Average Unfunded Nuclear Liabilities	1,060.3	14.3%	5.60%	44.5
8	7	Approved Rate Base	7,389.3	100.0%	N/A	384.2

Notes:

- Cost rate (column (c)) for capital components is provided; however cost of capital (column (d)) is only for 9 months.
- Short-term methodology to determine regulated portion of short-term debt, the cost rate and the amount proposed by OPG was approved.
- Reflects OEB directive to adjust the allocation of existing long-term debt to regulated operations to reflect the Board's Decision with respect to the unfunded nuclear liabilities (Decision with Reasons, Pg. 165). The allocation ratio is applied to determine the regulated portion of company-wide borrowing. OPG allocates corporate-wide borrowing based on net assets as illustrated in EB-2007-0905 Ex. C1-T1-S2, Table 1. OPG has removed the unfunded nuclear liabilities from net fixed assets and applied the resulting ratio to the corporate-wide borrowing described in EB-2007-0905 Ex. C1-T1-S2 Table 4, line 22. The calculation of the revised allocation ratio of 54.9% for 2008 is:

	Regulated	Company	Allocation Ratio
Net assets per EB-2007-0905 Ex C1-T1-S2	6,924.6	11,917.0	58.1%
Remove unfunded nuclear liability for 2008 (see note 6 below)	1,060.3	1,221.0	
Revised net assets used to determine allocation ratio	5,864.3	10,696.0	54.8%

OPG's corporate-wide borrowing for 2008 is \$3,182.4M as described in EB-2007-0905 Ex. C1-T1-S2 Table 4, line 22. Project financing of \$348M in 2008 associated with regulated projects is directly assigned to regulated operations.

- Debt required to balance capital structure with proposed rate base. Interest Rate of 5.63% approved by OEB.
- OEB approved a Debt / Equity ratio of 53% debt, 47% equity and an 8.65% return on common equity.
- The portion of rate base to be financed pursuant to the capital structure approved by the Board will not include the lesser of the forecast of the average unfunded liabilities related to Pickering and Darlington, and the average unamortized asset retirement costs included in fixed asset balances for Pickering and Darlington. Unfunded nuclear liabilities of \$1,060.3M are removed from rate base financing as the amount is less than the average unamortized asset retirement costs as illustrated below:

1) Average unamortized asset retirement costs for 2008 stated in Decision With Reasons (Pg. 90):	1,227.0
2) Average unfunded nuclear liability	
Total Company per Ex. J7.1	1,221.0
Bruce Lease portion	160.7
Pickering / Darlington portion of average unfunded nuclear liabilities	1,060.3
- The Board approved OPG's proposed rate base. Rate base is referenced at EB-2007-0905 Ex. K1-T1-S1 Table 1, line 4, column (g).

Numbers may not add due to rounding.

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Appendix A
Table 5a

Table 5a
Summary of Changes in Capitalization and Cost of Capital: January 1, 2009 to December 31, 2009
OPG Proposed (\$M)

Line No.	Note	Capitalization	Principal (\$M)	Component (%)	Cost Rate (%)	Cost of Capital (\$M)
			(a)	(b)	(c)	(d)
			Note 1			Note 2
		Capitalization and Return on Capital:				
1		Short-term Debt	189.3	2.6%	5.98%	11.3
2		Existing/Planned Long-Term Debt	2,362.7	32.1%	5.79%	136.8
3	3	Other Long-Term Debt Provision	573.2	7.8%	6.47%	37.1
4	4	Total Debt	3,125.3	42.5%	5.93%	185.2
5	4	Common Equity	4,228.4	57.5%	10.50%	444.0
6	5	Rate Base	7,353.7	100%	8.55%	629.1

Notes:

- 1 Capital components referenced at EB-2007-0905 Ex. K1-T1-S1 Table 2, lines 5, 6 and 7 of column (c).
- 2 Cost of capital referenced at EB-2007-0905 Ex. K1-T1-S1 Table 2, lines 9, 10 and 11 of column (c).
- 3 Debt required to balance capital structure with proposed rate base. See EB-2007-0905 Ex. C1-T2-S2, Table 5b for interest rate calculation.
- 4 Capital structure and return on equity proposal per EB-2007-0905 Ex. C1-T2-S1.
- 5 Rate base referenced at EB-2007-0905 Ex. K1-T1-S1 Table 2, line 4, column (c).

Numbers may not add due to rounding.

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Appendix A
Table 5b

Table 5b
Summary of Changes in Capitalization and Cost of Capital: January 1, 2009 to December 31, 2009
Board Approved (\$M)

Line No.	Note	Capitalization	Principal (\$M)	Component (%)	Cost Rate (%)	Cost of Capital (\$M)
			(a)	(b)	(c)	(d)
		Capitalization and Return on Capital:				
1	1	Short-term Debt	189.3	3.0%	5.98%	11.3
2	2	Existing/Planned Long-Term Debt	2,229.2	35.2%	5.79%	128.7
3	3	Other Long-Term Debt Provision	942.1	14.9%	6.16%	58.0
4	4	Total Debt	3,360.6	53.0%	5.89%	198.0
5	4	Common Equity	2,980.2	47.0%	8.65%	257.8
6	5	Rate Base Financed by Capital Structure	6,340.8	86.2%	7.19%	455.8
7	5	Average Unfunded Nuclear Liabilities	1,012.9	13.8%	5.60%	56.7
8	6	Approved Rate Base	7,353.7	100.0%	6.97%	512.5

Notes:

- Short-term methodology to determine regulated portion of short-term debt, the cost rate and the amount proposed by OPG was approved.
- Reflects OEB directive to adjust the allocation of existing long-term debt to regulated operations to reflect the Board's Decision with respect to the unfunded nuclear liabilities (Decision with Reasons, Pg. 165) described in Draft Rate Order App A Table 4b, Note 3. The revised ratio for 2009 is:

	Regulated	Company	Allocation Ratio
Net assets per EB-2007-0905 Ex. C1-T1-S2	6,924.6	11,917.0	58.1%
Remove unfunded nuclear liability for 2008 (see note 5 below)	1,012.9	878.1	
Revised net assets used to determine allocation ratio	5,911.7	11,038.9	53.6%

OPG's corporate-wide borrowing for 2008 is \$2,960.9M as described in EB-2007-0905 Ex. C1-T1-S2 Table 4, line 21. Project financing of \$642.2M in 2009 associated with regulated projects is directly assigned to regulated operations.

- Debt required to balance capital structure with proposed rate base. Interest rate of 6.16% approved by OEB for 2009.
- OEB approved a Debt / Equity ratio of 53% debt, 47% equity and an 8.65% return on common equity.
- The portion of rate base to be financed pursuant to the capital structure approved by the Board will not include the lesser of the forecast of the average unfunded liabilities related to Pickering and Darlington, and the average unamortized asset retirement costs included in fixed asset balances for Pickering and Darlington. Unfunded nuclear liabilities of \$1,012.9M are removed from rate base financing as the amount is less than the average unamortized asset retirement costs as illustrated below:
 - Average unamortized asset retirement costs for 2009 stated in Decision With Reasons (Pg. 90): 1,121.0
 - Average unfunded nuclear liability

Total company per Ex. J7.1	878.1	
Bruce Lease portion	(134.8)	
Pickering / Darlington portion of average unfunded nuclear liabilities		<u>1,012.9</u>
- The Board approved OPG's proposed rate base. Rate base is referenced at EB-2007-0905 Ex. K1-T1-S1 Table 2, line 4, column (c).

Numbers may not add due to rounding.

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Appendix A
Table 6

Table 6
Typical Residential Customer Bill Impact
Board Approved Revenue Requirement Adjustments (\$M)
Test Period April 1, 2008 to December 31, 2009

Line No.	Description	Test Period		
		Regulated Hydroelectric	Nuclear	Total
		(a)	(b)	(c)
1	Typical Residential Consumer Usage (KWh/Month) ¹	1,000.0	1,000.0	1,000.0
2	Gross-up for Line Losses ²	1.0522	1.0522	1.0522
3	OPG Portion ³	11.4%	31.9%	43.3%
4	Residential Consumer Usage of OPG Generation (KWh/Month) (line 1 * line 2 * line 3)	119.8	336.0	455.8
IMPACT OF RECOVERY OF APPROVED REVENUE REQUIREMENT:				
5	Approved Revenue Deficiency After Mitigation ⁴	115.2	483.0	598.3
6	Approved Production Forecast (TWh) ⁵	31.5	88.2	119.7
7	Required Recovery (\$/MWh) (line 5 / line 6)	3.70	5.50	5.00
8	Typical Monthly Consumer Bill Impact (\$) (line 4 * line 7)	0.44	1.85	2.28
9	Typical Monthly Residential Consumer Bill (\$) ⁶	111.63	111.63	111.63
10	Percentage Increase in Consumer Bills (line 8 / line 9)	0.40%	1.66%	2.05%

Notes:

- 1 From EB-2007-0905 Ex K1-T1-S3 Table 1, line 1
- 2 From EB-2007-0905 Ex K1-T1-S3 Table 1, line 2
- 3 From EB-2007-0905 Ex K1-T1-S3 Table 1, line 3
- 4 From Draft Rate Order App A Table 3, line 7
- 5 From Draft Rate Order App A Table 3, line 1
- 6 From EB-2007-0905 Ex K1-T1-S3 Table 1, line 11

Numbers may not add due to rounding.

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Appendix A
Table 7

Table 7
Summary of Changes to Bruce Lease Revenues and Costs: April 1, 2008 to December 31, 2009 (\$M)

Line No.	Description	April 1 to December 31, 2008				January 1 to December 31, 2009			
		OPG Proposed	Board Adjust	Note	Board Approved	OPG Proposed	Board Adjust	Note	Board Approved
		(a)	(b)		(c)	(d)	(e)		(f)
	Note 1		Note 2				Note 2		
	Revenues:								
1	Lease Revenue	257.4	20.7	3	278.1	263.2	15.5	3	278.7
2	Services Revenue	19.7	(7.7)	4	12.0	12.6	0.0		12.6
3	Total Bruce Revenues	277.1	13.0		290.1	275.8	15.5		291.3
	(line 1 + line 2)								
	Costs:								
4	Depreciation	77.5	(7.7)	5	69.8	66.7	0.0		66.7
5	Property Tax	15.2	0.0		15.2	15.5	0.0		15.5
6	Capital Tax	2.6	1.8	6	4.4	2.5	1.1	4	3.6
7	Used Fuel Storage and Management	14.1	0.0		14.1	14.8	0.0		14.8
8	Interest	28.4	(7.2)	7	21.2	27.6	(6.5)	5	21.1
9	Income Tax	0.0	37.7	8	37.7	0.0	37.7	6	37.7
10	Return on Equity	70.2	(70.2)	9	0.0	66.1	(66.1)	7	0.0
11	Earnings on Segregated Funds	0.0	(234.9)		(234.9)	0.0	(262.0)		(262.0)
12	Accretion on Nuclear Liabilities	0.0	255.9		255.9	0.0	282.0		282.0
13	Total Bruce Costs	208.0	(24.6)		183.4	193.2	(13.8)		179.4
14	Revenues Less Costs	69.1	37.6		106.7	82.6	29.3		111.9
	(line 3 - line 13)								
15	Adjust for Jan 1, 2008 to March 1, 2008	17.3	9.4		26.7	N/A	N/A		N/A
16	Offset to Test Period Revenue Requirement								
	(line 14 - line 15)	51.8	28.2		80.0	82.6	29.3		111.9

For notes see Table 7a.

Numbers may not add due to rounding.

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Appendix A
Table 7a

Table 7a
Notes to Table 7

Summary of Changes to Bruce Lease Revenues and Costs: April 1, 2008 to December 31, 2009 (\$M)

Notes:

- 1 Lines 1 to 13 reflect annual values for 2008 and 2009. Adjustment to back-out January 1 - March 31 period for 2008 is made in Line 15.
- 2 Detail provided in EB-2007-0905 Ex. J8.1, Attachment 1 except as noted in Notes 4, 5 and 8 below.

	<u>2008</u>	<u>2009</u>
3 Bruce Lease Revenues: Adjust to accrual basis of revenue recognition	20.7	15.5
4 2008 revenue per Ex. J8.1 is \$290.1M. The reconciliation provided in Ex. J8.1 lists only GAAP adjustments. The adjustment of (\$7.7M) is a non-GAAP adjustment required to obtain \$290.1M. The offsetting expense adjustment is shown in Note 5 below.	(7.7)	0.0
5 2008 depreciation per Ex. J8.1 is \$69.8M. The reconciliation provided in Ex. J8.1 lists only GAAP adjustments. The adjustment of (\$7.7M) is a non-GAAP adjustment required to obtain \$69.8M. The offsetting revenue adjustment is shown in Note 4 above.	(7.7)	0.0
6 Capital Taxes: Replace amounts determined using regulatory methodology (\$2.6M) with GAAP methodology (\$4.4M)	(2.6)	(2.5)
Apply GAAP based methodology	4.4	3.6
Capital tax adjustment	1.8	1.1
7 Interest Expense: Replace deemed Interest on hypothetical capital structure	(28.4)	(27.6)
Apply debt ratio and interest rates determined on a GAAP basis	21.2	21.1
Interest expense adjustment	(7.2)	(6.5)
8 Income Tax: Remove taxes determined in accordance with rate regulated accounting	0.0	0.0
Apply tax expense determined consistent with GAAP for unregulated operations	37.7	37.7
Income tax adjustment	37.7	37.7
9 Eliminate return on equity.	(70.2)	(66.1)

Numbers may not add due to rounding.

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Appendix B
Table 1

Table 1
Regulated Hydroelectric Payment Amount
Test Period April 1, 2008 to December 31, 2009

Line No.	Description	Test Period
		(a)
	<u>PAYMENT AMOUNT:</u>	
1	Approved Revenue Requirement before Mitigation (\$M) ¹	1,180.4
2	Mitigation Required by OEB (\$M) ²	27.0
3	Approved Revenue Requirement Recovery (line 1 - line 2)	1,153.4
4	Forecast Production (TWh) ³	31.5
5	Board Approved Payment Amount (\$/MWh) (line 1 / line 4)	36.66

Notes:

- 1 From Draft Rate Order App A Table 3, line 4
- 2 From Draft Rate Order App A Table 3, line 6
- 3 From Draft Rate Order App A Table 3, line 1

Numbers may not add due to rounding.

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Appendix C
Table 1

Table 1
Nuclear Payment Amount
Test Period April 1, 2008 to December 31, 2009

Line No.	Description	Test Period
		(a)
	PAYMENT AMOUNT:	
1	Approved Revenue Requirement before Mitigation (\$M) ¹	4,992.6
2	Mitigation Required by OEB (\$M) ²	141.7
3	Approved Revenue Requirement Recovery (line 1 - line 2)	4,850.9
4	Approved Recovery Amount of Deferral and Variance Account Balances (\$M) ³	176.2
5	Revenue Requirement to be Recovered Through Payment Amounts (\$M) (line 3 - line 4)	4,674.8
6	Forecast Production (TWh) ⁴	88.2
7	Board Approved Payment Amount (\$/MWh) (line 5 / line 6)	52.98

Notes:

- 1 From Draft Rate Order App A Table 3, line 4
- 2 From Draft Rate Order App A Table 3, line 6
- 3 From Draft Rate Order App D Table 1, line 5, column (f)
- 4 From Draft Rate Order App A Table 3, line 1

Numbers may not add due to rounding.

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Appendix D
Table 1

Table 1
Nuclear Variance and Deferral Account Rider: Nuclear Payment Riders A and C

Line No.	Account Description	Proposed			Board Approved		
		Dec. 2007 Balance (\$M)	Recovery Period Ending	Recovery Amount (\$M)	Dec. 2007 Balance (\$M)	Note	Recovery Period Ending
		(a)	(b)	(c)	(d)		(e)
1	Pickering A Return to Service	183.80	Dec. 31, 2019	27.37	183.80	1	Dec. 31, 2011
2	Nuclear Liability	130.50	Dec. 31, 2010	83.05	130.50	2	Dec. 31, 2010
3	Nuclear Development and Capacity Refurbishment	27.90	Dec. 31, 2010	17.80	11.70	3	Dec. 31, 2010
4	Ancillary Services Net Revenue (Nuclear) Plus Transmission Outages and Restrictions	(0.10)	Dec. 31, 2010	(0.1)	(0.1)		Dec. 31, 2010
5	Total	342.10		128.16	325.90		
6	Board Approved Production Forecast April 1, 2008 to Dec 31, 2008 (TWh)			38.30		4	
7	Board Approved Production Forecast for 2009 (TWh)			49.90		4	
8	Total Forecast Production April 1, 2008 to December 31, 2009			88.20			
9	Nuclear Payment Rider--Recovery of Approved Deferral and Variance Account Amounts Effective April 1, 2008 (RIDER A) (line 5 / line 8)			1.45			
Nuclear Payment Rider Adjustment To Provide For Recovery of April 1, 2008 to November 30, 2008 Amounts							
10	Forecast Production for December, 2008 (TWh)					5	
11	Board Approved Production Forecast for 2009 fiscal year					4	
12	Total Forecast Production December 1, 2008 to December 31, 2009 (line 10 + line 11)						
13	Nuclear Payment Rider Effective December 1, 2008 (\$/MWh): (line 5 / line 12)						
14	Nuclear Payment Rider--Recovery of Approved Deferral and Variance Account Amounts for the April 1, 2008 to November 30, 2008 Period (RIDER C) (line 13 - line 9)						

Notes:

- Recovery period reduced from 141 months to 45 months. Recovery is \$183.8M x 21 months / 45 months.
- The Board accepted the rate used, and the inclusion of the unamortized ARC relating to the Bruce nuclear station until the effective date of the OEB's first order.
- Removal of capacity refurbishment costs of \$16.2M including interest as per EB-2007-0905 Ex. J1-T1-S1 Table 8, column (d) rows 5 and 6.
- From EB-2007-0905 Ex. J1-T2-S1 Table 3, lines 6 and 7.
- Forecast production for December 2008 as per EB-2007-0905 Ex. E2-T1-S2, Table 1, line 7, column (I).

Numbers may not add due to rounding.

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Appendix E
Table 1

Table 1
Regulated Hydroelectric Interim Period Recovery Rider
Test Period April 1, 2008 to December 31, 2009

Line No.	Description	Test Period
		(a)
	<u>REVENUE SHORTFALL--APRIL 1, 2008 to NOVEMBER 30, 2008:</u>	
1	Board Approved Payment Amount (\$/MWh) ¹	36.7
2	Prescribed Payment Amount (\$/MWh)	33.0
3	Payment Amount Increase (\$/MWh) (line 1 - line 2)	3.7
4	Production April 1, 2008 to November 30, 2008 (TWh) ²	11.4
5	Revenue Shortfall April 1, 2008 to November 30, 2008 (\$M) (line 3 * line 4)	41.7
	<u>APPROVED PRODUCTION FORECAST--December 1, 2008 to December 31, 2009:</u>	
6	Forecast Production for December, 2008 (TWh) ³	1.6
7	Production Forecast for 2009 fiscal year (TWh) ⁴	18.5
8	Total Forecast Production December 1, 2008 to December 31, 2009 (TWh) (line 6 + line 7)	20.1
	<u>HYDROELECTRIC PAYMENT RIDER:</u>	
9	Hydroelectric Payment Rider Effective December 1, 2008 (\$/MWh) (line 5 / line 8)	2.08

Notes:

- 1 From Draft Rate Order App B Table 1, line 5.
- 2 From EB-2007-0905 Ex. K1-T1-S1 Table 3, line 1, column (a) minus 1.6 TWh for December 2008 as provided in Draft Rate Order App E Table 2, line 3, column (I).
- 3 From Draft Rate Order App E Table 2, line 3, column (I).
- 4 From Draft Rate Order App A Table 3, line 1.

Numbers may not add due to rounding.

Draft Rate Order
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Appendix E
Table 2

Table 2
Monthly Production Forecast - Regulated Hydroelectric (TWh)

Line No.	Regulated Hydroelectric	2008 Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2008 Total	Apr 1 - Dec 31, 2008
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)
															(sum (d) to (l))
1	Production Forecast	1.52	1.42	1.57	1.42	1.50	1.41	1.44	1.40	1.33	1.39	1.49	1.56	17.44	12.94

Line No.	Regulated Hydroelectric	2009 Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2009 Total
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
2	Production Forecast	1.54	1.40	1.61	1.47	1.61	1.54	1.58	1.54	1.48	1.53	1.58	1.64	18.52

Numbers may not add due to rounding.

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Appendix E
Table 3

Table 3
Nuclear Interim Period Recovery Rider: Nuclear Payment Rider B
Test Period April 1, 2008 to December 31, 2009

Line No.	Description	Test Period
		(a)
	<u>REVENUE SHORTFALL - April 1, 2008 to November 30, 2008:</u>	
1	Board Approved Payment Amount (\$/MWh) ¹	53.0
2	Prescribed Payment Amount (\$/MWh)	49.5
3	Payment Amount Increase (\$/MWh) (line 1 - line 2)	3.5
4	Forecast Production April 1, 2008 to November 30, 2008 (TWh) ²	33.7
5	Revenue Shortfall April 1, 2008 to November 30, 2008 (\$M) (line 3 * line 4)	117.2
	<u>APPROVED PRODUCTION FORECAST - December 1, 2008 to December 31, 2009:</u>	
6	Forecast Production for December, 2008 (TWh) ³	4.6
7	Production Forecast for 2009 fiscal year (TWh) ⁴	49.9
8	Total Forecast Production December 1, 2008 to December 31, 2009 (TWh) (line 6 + line 7)	54.5
	<u>NUCLEAR PAYMENT RIDER (RIDER B):</u>	
9	Nuclear Payment Rider--Recovery of Approved Revenue Deficiency Amounts for the April 1, 2008 to November 30, 2008 Period (RIDER B) (\$/MWh) (line 5 / line 8)	2.15

Notes:

- 1 From Draft Rate Order App C Table 1, line 7
- 2 From EB-2007-0905 Ex E2-T1-S2 Table 1 (2008), line 7, columns (d) to (k)
- 3 From EB-2007-0905 Ex E2-T1-S2 Table 1 (2008), line 7, column (l)
- 4 From Draft Rate Order App A Table3, line 1

Appendix F: Variance and Deferral Accounts

CLEARANCE OF EXISTING VARIANCE AND DEFERRAL ACCOUNTS

The Board approves the recovery of balances in the following variance accounts established under O. Reg. 53/05 for the period April 1, 2005 to March 31, 2008:

- Hydroelectric Water Conditions Variance Account
- Ancillary Services Net Revenue Variance Account (with sub-accounts for nuclear and hydroelectric)
- Transmission Outages and Restrictions Variance Account

With respect to the December 31, 2007 balances in these accounts, the Board approves the balances, recovery period and method of recovery as provided in the following table:

Account	Approved Balance	Recovery Period Ending	Method of Recovery
Hydroelectric Water Conditions	\$6.7M	Dec 31, 2009	Hydroelectric Payment Amount
Ancillary Services Net Revenue, Hydroelectric sub-account	\$6.7M	Dec 31, 2009	Hydroelectric Payment Amount
Ancillary Services Net Revenue, Nuclear sub-account	\$1.6M	Dec 31, 2010	Nuclear Payment Rider
Transmission Outages and Restrictions	\$(1.7)M	Dec 31, 2010	Nuclear Payment Rider

The Board approves the recovery of balances in the following deferral accounts established pursuant to O. Reg. 53/05 for the period April 1, 2005 to March 31, 2008:

- Pickering A Return to Service Deferral Account
- Nuclear Liability Deferral Account, Transition
- Nuclear Development Deferral Account, Transition

The Board approves the recovery of the December 31, 2007 balances in these accounts, the test period recovery amount and the recovery period as provided in the following table:

Account	Approved Balance	Recovery Period Ending	Test Period Recovery Amount
Pickering A Return to Service Deferral Account	\$183.8M	Dec 31, 2011	\$ 86.1M
Nuclear Liability Deferral Account	\$130.5M	Dec 31, 2010	\$ 83.0M
Nuclear Development Deferral Account, Transition	\$ 11.7M	Dec 31, 2010	\$ 7.4M
Total	\$325.9M	Not applicable	\$176.5M

The Board approves OPG's recovery of the test period recovery amount for the nuclear deferral accounts using a payment rider. A payment rider of \$2.00/MWh (Nuclear Payment Rider A) determined in Appendix D, Table 1, effective April 1, 2008 shall apply to OPG's nuclear production for the period December 1, 2008 to December 31, 2009. Effective December 1, 2008, a second payment rider of \$1.23/MWh (Nuclear Payment Rider C) determined in Appendix D, Table 1, shall apply to OPG's nuclear production for the period December 1, 2008 to December 31, 2009. Nuclear Payment Rider C shall enable OPG to recover amounts for Nuclear Payment Rider A for the period April 1, 2008 to November 30, 2008.

As the payment rider is based upon forecast production, any differences between forecast and actual production during the test period will cause a variance. This variance shall be carried forward to OPG's next payment application.

Existing Deferral and Variance Accounts

January 1, 2008 to March 31, 2008 Period

OPG shall continue to record differences between amounts reflected in its interim payment amounts authorized under O. Reg. 53/05 and OPG's actual costs/revenues incurred from December 31, 2007 to March 31, 2008 related to the following deferral and variance accounts:

- Hydroelectric Water Conditions Variance Account

- Ancillary Services Net Revenue Variance Account (with sub-accounts for nuclear and hydroelectric)
- Transmission Outages and Restrictions Variance Account
- Pickering A Return to Service Deferral Account
- Nuclear Liability Deferral Account, Transition
- Nuclear Development Deferral Account, Transition

OPG shall submit information to support amounts recorded post-December 31, 2007 in these accounts for disposition in OPG's next payment amounts application.

OPG shall record interest on the balances in accordance the interest rates established in O. Reg 53/05 until March 31, 2008. Effective April 1, 2008, OPG shall record interest on the balances in these accounts using the interest rates set by the Board from time to time pursuant to the Board's interest rate policy. OPG shall continue to apply interest to the opening monthly balance of these accounts, compounded annually until the balances are fully recovered.

CONTINUING VARIANCE AND DEFERRAL ACCOUNTS

OPG shall establish or continue, as applicable, the variance and deferral accounts listed below effective April 1, 2008.

OPG shall record interest on the balances in these accounts using the interest rates set by the Board from time to time pursuant to the Board's interest rate policy. OPG shall apply interest to the opening monthly balance of these accounts, compounded annually until the balances are fully recovered.

Hydroelectric Water Conditions Variance Account

The Hydroelectric Water Conditions Variance Account shall record the financial consequences of differences between forecast and actual water conditions as proposed in OPG's application. OPG shall determine the production impact of changes in water conditions by entering the actual flow values into the same production forecast model used to provide the Board approved production forecast, holding all other variables the same. OPG

shall determine the deviations from forecast as the difference between the resulting production from the production forecast model based on actual flows and the energy production forecast approved by the Board for the test period. The monthly regulated hydroelectric production forecast approved by the Board is provided in Draft Rate Order Appendix E, Table 2. OPG shall determine the revenue impact by multiplying the deviation from forecast, as described above, by the hydroelectric payment amount of \$36.66/MWh as calculated in Appendix B, Table 1. The resulting amount shall be recorded in the Hydroelectric Water Conditions Variance Account.

OPG shall also record in this account changes in the gross revenue charge payments as a result of differences in energy production (as provided above). OPG shall determine amounts to be recorded in this account by multiplying the deviation from production forecast as described above by the applicable gross revenue charge rate.

OPG shall also record in this account any variations from the payments included in OPG's application for the St. Lawrence Seaway Management Corporation for the conveyance of water in the Welland Ship Canal.

Ancillary Service Net Revenue Variance Account - Hydroelectric

OPG shall compare actual hydroelectric ancillary service net revenue to the forecast amount of \$57.4M as reflected in the revenue requirement approved by the Board. Each month the difference shall be recorded in this variance account. The specific ancillary services for regulated hydroelectric operations are: black start capability, operating reserve, automatic generation control, and reactive support/voltage control service.

Ancillary Service Net Revenue Variance Account - Nuclear

OPG shall compare actual nuclear ancillary service net revenue to the forecast amounts of \$5.4M as reflected in the revenue requirement approved by the Board. Each month the difference shall be recorded in this variance account. The specific ancillary services for nuclear operations included in the test period forecast are operating reserve and reactive support/voltage control service.

Pickering A Return to Service Deferral Account

OPG shall continue to record amounts in the Pickering A Return to Service Deferral Account established effective January 1, 2005 under to O. Reg. 53/05.

Nuclear Liability Deferral Account

OPG shall establish a Nuclear Liability Deferral Account effective April 1, 2008 under O. Reg. 53/05. The account shall record the revenue requirement impact of any change in its nuclear decommissioning liability arising from an approved reference plan. OPG shall not record the revenue requirement impact of a change in its nuclear decommissioning liability associated with its nuclear obligations related to the Bruce facilities. OPG shall record the return on rate base using the average accretion rate on OPG's nuclear liabilities of 5.6% for the test period.

The "nuclear decommissioning liability" shall be defined as "the liability of Ontario Power Generation Inc. for decommissioning its nuclear generating facilities and the management of its nuclear waste and nuclear fuel." An "approved reference plan" shall be defined as "a reference plan, as defined in the Ontario Nuclear Funds Agreement, which has been approved by Her Majesty the Queen in the right of Ontario in accordance with that agreement."

OPG shall transfer the balance in the Nuclear Liability Deferral Account, Transition to this account effective April 1, 2008.

Nuclear Development Variance Account

OPG shall establish a Nuclear Development Variance Account effective April 1, 2008 pursuant to O. Reg. 53/05. The account shall record variances between the actual costs incurred and firm financial commitments made in the course of planning and preparation for the development of proposed new nuclear generation facilities during the test period and those approved by the Board.

OPG shall transfer the balance in the Nuclear Development Deferral Account, Transition to this account effective April 1, 2008.

NEW VARIANCE AND DEFERRAL ACCOUNTS

OPG shall record interest on the balances in these accounts using the interest rates set by the Board from time to time pursuant to the Board's interest rate policy. OPG shall apply interest to the opening monthly balance of these accounts, compounded annually, until the balances are fully recovered.

OPG shall establish the following four new accounts effective April 1, 2008:

Capacity Refurbishment Variance Account

OPG shall establish a Capacity Refurbishment Variance Account pursuant to O. Reg. 53/05 section 6 (2) 4 to record variances between the actual capital and non-capital costs, and firm financial commitments incurred to increase the output of, refurbish or add operating capacity to a generation facility referred to in O. Reg. 53/05 section 2 during the test period and those forecast costs approved by the Board. This account shall include assessment costs and pre-engineering costs and commitments.

Nuclear Fuel Cost Variance Account

OPG shall establish a Nuclear Fuel Cost Variance Account as proposed in its application to record the difference between the forecast and the actual cost of nuclear fuel expensed in the test period. OPG shall determine the variance based on the variance in the total cost of the fuel bundles. OPG shall determine the difference between the nuclear fuel cost rate, expressed in \$/MWh using the nuclear fuel cost as reflected in the revenue requirement approved by the Board and the production forecast approved by the Board, and the actual cost of nuclear fuel on a \$/MWh basis. OPG shall apply this difference to its actual nuclear production during the test period. The resulting amount shall be recorded as the cost variance.

Income and Other Taxes Variance Account

OPG shall establish an Income and Other Taxes Variance Account as proposed in its application to record the financial impact on revenue requirement of:

- Any differences that result from a legislative or regulatory change to the tax rates or rules of the *Income Tax Act* (Canada) and the *Corporations Tax Act* (Ontario), as modified by

the regulations under the *Electricity Act, 1998* to determine payments in lieu of corporate income taxes and capital taxes and the regulations under the *Electricity Act, 1998* to determine payments in lieu of property tax to the Ontario Electricity Financial Corporation.

- Any differences in municipal property taxes that result from a legislative or regulatory change to the tax rates or rules for its regulated assets under the *Assessment Act, 1990*.
- Any differences that result from a change in, or a disclosure of, a new assessing or administrative policy that is published in the public tax administration or interpretation bulletins by relevant federal or provincial tax authorities, or court decisions on other taxpayers that OPG will incorporate in determining its actual payments in lieu of corporate income taxes and capital taxes.
- Any differences that result from tax assessments or re-assessments (including re-assessments associated with the application of these rates and rules to OPG's regulated operations or changes in assessing or administrative policy including court decisions on other taxpayers).

OPG shall calculate the income tax provision resulting from the revenue requirement approved by the Board and file it with the Board. That tax provision shall be used to calculate any variations in taxes recorded in the variance account.

Bruce Lease Net Revenues Variance Account

OPG shall establish a variance account to capture differences between (i) the forecast costs and revenues related to Bruce that are factored into the test period payment amounts for Pickering and Darlington, and (ii) OPG's actual revenues and costs in respect of Bruce. The revenues and costs factored into the test period payment amounts are detailed in Appendix A Table 7 of the Draft Rate Order. The cost impact of any changes in nuclear liabilities related to the Bruce stations shall also be recorded in this account.