



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
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Toronto, Ontario
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March 11, 2024
Our File: EB20230336

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2023-0336 – OPG DVA and MRP – Revised SEC Interrogatories

We are counsel to the School Energy Coalition ("SEC"). Enclosed, please find SEC's revised interrogatories in this matter.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Applicant and intervenors (by email)

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Ontario Power
Generation Inc. for an Order or Orders relating to impacts from
the Market Renewal Program on prescribed generating facilities,
and the disposition of balances in its deferral and variance
accounts as of December 31, 2022.

INTERROGATORIES

ON BEHALF OF THE

SCHOOL ENERGY COALITION

H1-SEC-1

[H1-1-1, Table 7b] With respect to the 2017-2021 in-service additions eligible for inclusion in the CRVA for regulated hydroelectric:

- a. Please explain the difference between ‘Total Project Cost’ and ‘1st Execution Business Case costs.
- b. For each project that had a final in-service date after 2021, please provide the Total Project Costs and 1st Execution Business Case forecast for the equivalent scope of work that involved in-service additions between 2018 and 2021.
- c. For all projects whose final in-service date is after 2021, please provide the final total in-service costs.
- d. For all projects with a total forecast cost above \$10M, please provide a copy of the following documents:
 - i. 1st Execution Business Case
 - ii. Any subsequent Business Cases
 - iii. A copy of all internal audits, reviews (internal or external), or similar documents discussing project performance.
- e. Have any of the projects increased hydroelectric generating capacity? If so, please provide details including the actual increase.

H1-SEC-2

[H1-1, p.49-51] With respect to the Sale of Unprescribed Kipling Site Deferral Account:

- a. Please confirm the Kipling Site was owned by Ontario Power Generation Inc. and not by any affiliate.
- b. Please allocate both the net proceeds and gain on sale between, a) land, and b) buildings and other depreciable property. Please detail the basis of the allocation.
- c. Please provide a breakdown of the net gain on sale calculation.

- d. Please provide a continuity schedule for the Kipling Site from 2008 to its disposition.
- e. Please confirm that the portion of the asset service fee for the Kipling Site Deferral Account includes depreciation, and cost of capital (grossed up for taxes).
- f. Please confirm that the asset service calculation related to the Kipling Site, mathematically, results in largely the same outcome as would be derived from a revenue requirement calculation.
- g. For each year since 2008, please provide the total asset service fees for the Kipling Site that were a) included in rates, and b) allocated to the regulated business. Please further breakdown the information into nuclear and hydroelectric.
- h. [p.51] OPG says, “Additionally, ratepayers have not been previously charged for costs related to the asset retirement and environmental liabilities carried on OPG’s balance sheet in connection with the Kipling Site.” Please explain what those costs are, and if they had been charged to ratepayers, what they would have been and the basis for it.
- i. If the OEB disagrees with OPG’s position and determines that ratepayers should receive the benefit of the proceeds and/or gains of disposition of the Kipling Site, please provide OPG’s view of how that should be done.

H1-SEC-3

[H1-1-1, Attachment 3, p.1] OPG calculation of economic loss includes when “the forecasted market revenues from PGS generation in the next on-peak period would be insufficient to recover the costs of pumping in the current off-peak period.” Please explain how OPG defines “next on-peak period” and how it forecasts the market price for that period.

H1-SEC-4

[H1-1-1, Attachment 3, p.3-73] OPG has provided a table that shows each hour when OPG did not pump the PGS and where an entry into the SBGVA was made:

- a. For each hour in the table, please provide the following additional information:
 - i. Total MWh
 - ii. Approved Payment Amount
 - iii. HOEP
 - iv. Forecast HOEP in next on-peak period
 - v. GRC costs
 - vi. Total forecast revenues in current off-peak period (before GRC costs)
 - vii. Total forecast revenues in the next on-peak period (before GRC costs)
 - viii. Costs associated with Pumping – Load Charges
 - ix. Costs associated with Pumping – Opportunity cost of SAB 1 and 2 forgone productions while the PGS is pumping
 - x. Cost associated with Pumping - Other
 - xi. Total entry into SBGVA

Please provide the response in Excel format.

- b. Part (a) seeks to better understand and verify the conditions in each hour that OPG says would have led to an economic loss if the OPG pumped water into the PGS. If there is further

data and information that would explain the decision that is not being requested in part (a), please include it.

- c. If there was no sharing of HIM revenue with customers, what impact would it have on the number of hours where OPG determined there was an economic loss, if it was to pump the PGS?

H1-SEC-5

[H1-1-1, Attachment 3, p.3-73] Please provide a similar table that shows all hours when an entry into the SBGVA was made, that includes, a) the year, hour, and day, b) the total amount of the entry, c) the number of MWh, d) HOEP, and e) the reason for the entry. Please provide the response in Excel format.

M1-SEC-6

[M1-1-1, p.11] Please provide a copy of any analysis undertaken regarding the potential financial impact of the proposal, as well as any other possible revisions considered to the HIM.

M1-SEC-7

[M1-1-1, p.11] Please provide a copy of all analyses undertaken by OPG regarding the efficacy of the current HIM methodology.

M1-SEC-8

[M1-1-1, p.11] For each year between 2010 and 2023, please provide the:

- a. Total HIM revenue
- b. Total MWh where HIM was a positive amount
- c. Total MWh where HIM was a negative amount

M1-SEC-9

[M1-1-1, p.16] Please provide a copy of any analysis undertaken by OPG regarding the interaction between the HIM and SBGVA.

M1-SEC-10

[M1-1-1, p.18] Please provide a copy of the full modelling analysis OPG undertook.

Respectfully, submitted on behalf of the School Energy Coalition on March 11, 2024.

Mark Rubenstein
Counsel for the School Energy Coalition