

March 8, 2024

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms Marconi:

EB-2023-0336 – Ontario Power Generation Inc. – Market Renewal Program and Deferral and Variance Accounts

Please find, attached, interrogatories for Ontario Power Generation from the Consumers Council of Canada pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

INTERROGATORIES FOR ONTARIO POWER GENERATION
FROM THE CONSUMERS COUNCIL OF CANADA
MARKET RENEWAL PROGRAM AND DEFERRAL AND VARIANCE ACCOUNTS DISPOSITION

RE: EB-2023-0336

CCC-1

Ex. H1/T1/S1

Are any of the accounts OPG is proposing to clear subject to a materiality threshold? If so, what is the materiality threshold for each account? If not, why not?

CCC-2

Ex. H1/T1/S1/p. 17 and Attachment 4

Nineteen regulated hydroelectric projects placed in service between June 1, 2017 and December 31, 2021, give rise to capital-related additions recorded to the CRVA during the period. Is OPG seeking final approval of the costs of these projects through this Application? If not, when will the prudence of these projects be reviewed?

CCC-3

Ex. H1/T1/S1/Attachment 4

The Sir Adam Beck- Unit G5 Major overhaul cost was \$9.9 million over the Class 2 estimate of \$34.8 million. Please provide a detailed explanation of the cost overruns.

CCC-4

Ex. H1/T1/S1/Attachment 4

The Pine Portage Generating Station – Auto Sluice System Replacement project was \$3.4 million higher than the Class 3 estimate of \$9.7 million. Please provide a detailed explanation of the cost overruns.

CCC-5

Ex. H1/T1/S1/p. 19

OPG proposes to clear a debit of \$33.4 million in 2020 and \$43.9 million in 2021 for the D2O Storage project. Are these amounts the result of cost overruns? Please explain and provide a detailed explanation as to what these amounts relate to. Please provide all of the OEB-approved forecast costs and actual costs related to the D2O Project.

CCC-6

Ex. H1/T1/S1/p. 21

Please provide a detailed schedule setting out the OEB-approved forecasts for the Pickering Extended Operations and the actual costs for each year. Please explain all variances.

CCC-7

Ex. H1/T1/S1/p. 23-24

Please provide a schedule setting out the OEB-approved forecasts for the Fuel Channel Life Extension Ongoing Costs and the actual costs for each year. Please explain all variances.

CCC-8

Ex. H1/T1/S1pp. 38-39

Over the 2020-2022 period OPG recorded debit additions of \$105.2 million to the Nuclear Development Business Account in relation to non-capital preliminary planning and preparation costs for a Darlington SMR (small modular reactor):

- a) Is OPG seeking recovery of this amount through the Application?
- b) Please provide detailed budgets for each of the 4 activities identified in Chart 4 for 2020, 2021 and 2022;
- c) Please provide detailed budgets for the years 2023-2026 regarding SMRs;
- d) Please provide the due diligence assessment referred to in the evidence;
- e) Please provide all materials provided to OPG's Board of Directors regarding the selection of the SMR technology;
- f) Please provide all materials provided to the Province regarding the selection of the SMR technology;
- g) Please provide a list of all technologies considered.
- h) Please provide all reports produced internally regarding the selection of the SMR supplier and technology.

CCC-9

Ex. M1/T1/S1

Please provide all materials provided to Ontario Power Generation's Board of Directors regarding the approvals sought through this Application regarding the Market Renewal program and clearance of the Deferral and Variance Accounts. Please provide all reports produced internally or externally regarding the approvals sought through this Application regarding the Market Renewal Program.