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June 11, 2024

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

Dear Ms. Marconi,

RE: EB-2024-0136 OPG Filing Guidelines Review – Energy Probe Comments

At the stakeholder consultation meeting on May 14, 2024, and in its letter of May 15, 2024, the OEB invited participants in the EB-2024-0136 consultation on the OPG Filing Guidelines Review to provide written feedback comments by June 11, 2024. At the meeting, the OEB provided three specific topics that stakeholders should address in their comments. The following are the comments of Energy Probe Research Foundation (Energy Probe) on the three topics.

Item 1: Thresholds for capital projects & OM&A expenses

The OEB Seeking input on whether the following thresholds for capital projects are still appropriate: \$20 million or more, between \$5 million & \$20 million less than \$5 million. Energy Probe believes that they are.

The OEB is proposing that for projects \$5million or greater the following information be provided:

- Name, description, start date, in service date, and cost for each project
- Actual in-service, dates for projects closed to rate base in the Historical Years; projected in- service dates for the Bridge Year and Test Year(s)
- Total cost of all projects in this category

Energy Probe believes that for the Bridge and Historical years a variance analysis from the OEB approved amount should be provided for each capital project \$5 million or greater.

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The OEB is proposing that a business case should only be filed for projects of \$20 million or more. Energy Probe agrees.

The OEB is seeking input on whether the following thresholds for OM&A expenses are still appropriate: lesser of 1% of total expenses before taxes or \$20 million. Energy Probe believes that they are still appropriate.

The OEB proposes that certain Details of the budgets for each of the Historic Years, the Bridge Year and the Test Year(s) should be provided. Energy Probe agrees but believes that for the Bridge and Historical years a variance analysis from the OEB approved amount should be provided for each OM&A expense lesser of 1% of total expenses before taxes or \$20 million.

Item 2: Requirement for year-over-year and/or term-over-term variance analysis for Other Revenue

The OEB is seeking input on whether this should remain a requirement and/or add term-over-term variance analysis: Year-over-year over the Historic Years, the Bridge Year and the Test Year(s). Energy Probe did not find this information useful and believes that this requirement can be dropped.

Item 3: Organization of the Operating Revenue Exhibit

Seeking feedback on the organization of this section. The organization of this exhibit in the current version of the OPG Filing Guidelines is not consistent with how OPG has structured its most recent payment amounts application (2022-2026 term). Energy Probe believes that the organization of this section should be consistent with the structure of OPG's most recent payment amounts application.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)
Vithooshan Ganesanathan (OEB Staff)
Consultation Stakeholders

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