

ONTARIO ENERGY BOARD
IN THE MATTER OF the *Ontario Energy Board Act, 1998*;

AND IN THE MATTER OF an Application by Ontario Power Generation Inc. and DNNP LP by its general partner, DNNP GP Inc. for an order or orders approving payment amounts for prescribed generating facilities commencing January 1, 2027

Reply of Keith Pinto to OPG Submissions Objecting to Intervention Request

I. Introduction and Scope

1. I respectfully submit this reply in response to the submissions of Ontario Power Generation Inc. (“OPG”) dated February 11, 2026 objecting to my request for intervenor status in this proceeding.
2. I disagree with OPG’s characterization of my motives, conduct, and suitability to participate. The tone and scope of OPG’s objection are exceptional and extend well beyond the matters ordinarily relevant to the Ontario Energy Board’s determination under Rule 22.02.
3. I acknowledge that other unresolved matters exist involving OPG and its affiliates. Those matters are not relevant to the Board’s mandate in this proceeding and are being addressed through the appropriate legal and regulatory forums. I will not seek to import them into this process, and I respectfully submit that they should not be considered by the Board in assessing my intervention request.

II. Substantial Interest in the Proceeding

4. This application concerns the approval of payment amounts for prescribed generating facilities commencing January 1, 2027, during a period of exceptional capital investment and system transformation in Ontario’s electricity sector, including significant nuclear refurbishment and life-extension activity.
5. These payment frameworks will have long-term and material financial implications for Ontario ratepayers, who ultimately bear the cost and risk of these arrangements.
6. I participate solely in my personal capacity as an individual Ontario ratepayer. I do not represent an organization, industry group, or advocacy body. My interest is therefore direct, financial, and non-institutional, and squarely within the scope of the Board’s mandate.

7. My proposed participation is narrowly focused on issues of cost recovery, governance, internal controls, and transparency as they relate to ratepayer impacts. These matters are directly relevant to the Board's statutory responsibilities and to the prudence of the payment amounts under consideration.

III. Responsible Participation

8. OPG's objection relies extensively on personal history and collateral matters unrelated to the issues before the Board. I respectfully submit that such matters are outside the Board's jurisdiction and do not assist in determining whether an intervenor intends to participate responsibly under Rule 22.02.
9. I expressly and unequivocally commit that I will not raise, reference, or seek to advance any personal, employment-related, or collateral matters in this proceeding. While I acknowledge that other unresolved matters exist, those matters are outside the Ontario Energy Board's mandate and are being addressed through the appropriate legal and regulatory forums. My participation in this proceeding will remain strictly confined to issues within the Board's jurisdiction, including cost recovery, governance, internal controls, and ratepayer impacts.
10. I categorically reject the suggestion that my participation would be disruptive or irresponsible. My intervention request was deliberately scoped to avoid duplication, to respect procedural efficiency, and to focus on matters of relevance to ratepayers.
11. I have already engaged constructively with other intervenors in this proceeding, including representatives of BOMA/Enerlife, with the objective of avoiding duplication and promoting efficiency. I will make every reasonable effort to coordinate with other intervenors, where appropriate, while retaining the ability to advance distinct ratepayer-focused issues within the Board's mandate.
12. Any interrogatories I may seek would be narrowly tailored, non-duplicative, and focused on clarifying governance, cost allocation, and ratepayer impacts. My objective in participating is to assist the Board in testing the evidentiary record from a ratepayer perspective, not to advance any personal interest or collateral agenda.
13. If the Board has any concerns regarding scope or process, I would welcome reasonable conditions on my participation to ensure efficiency and focus.

IV. Assistance to the Board under Rule 22.02

14. For clarity, and to assist the Board in its consideration under Rule 22.02, I respectfully submit that my participation, if granted, would assist the Board by providing a focused ratepayer perspective on governance, cost recovery, and internal controls during a period of exceptional capital investment and long-term financial exposure.

15. As an individual ratepayer without institutional affiliation, my participation is non-duplicative and complementary to that of organizational intervenors. Any submissions or interrogatories I may advance would be proportionate and directed to matters within the Board's mandate, with the objective of supporting the Board's statutory responsibilities.

V. Timeliness and Procedural Fairness

16. While OPG emphasizes the timing of my intervention request, the proceeding remains at an early stage and no prejudice has been identified. The Board has routinely exercised discretion to permit late interventions where they assist the record and do not impede the orderly conduct of the proceeding.

17. I further note that OPG's objection itself was filed outside the standard five-day period typically contemplated for responses to intervention requests. I raise this not as a technicality, but to underscore the importance of procedural balance and proportionality in the Board's consideration.

VI. Conclusion

18. I respectfully submit that OPG's objection is disproportionate in tone and scope, and relies on matters extraneous to the Board's determination under Rule 22.02.

19. I ask that the Board assess my intervention request on its merits, having regard to:

- my direct and substantial interest as a ratepayer,
- the relevance of the issues I propose to address,
- my express commitment to responsible, jurisdiction-disciplined participation,
- my willingness to coordinate with other intervenors, and
- my readiness to accept reasonable procedural conditions.

20. For these reasons, I respectfully request that my application for intervenor status be granted.

February 12, 2026

ALL OF WHICH IS RESPECTFULLY SUBMITTED.