



February 12, 2026

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

**Re: EB-2025-0297 OPG & DNNP LP2027-2031 Payment Amounts Application
Pre-Hearing Conference**

Dear Mr. Murray:

In accordance with Procedural Order No. 1 issued February 5, 2026, AMPCO provides the following comments on the draft list of issues provided as Schedule C, and the draft timeline provided as Schedule D.

Draft Issues List

The draft issues list was developed by the OEB for discussion purposes, using OPG and DNNP LP's proposed issues list as a starting point.

The OEB's draft issues list proposes that the following Issue 7.6 from OPG and DNNP LP's proposed issues list be incorporated under Issues 22, 23 and 24 with respect to Operating Costs:

Are the IR term human resource related costs (including wages, salaries, payments under contractual work arrangements, benefits, incentive payments, overtime FTEs and pension costs) appropriate?

AMPCO proposes that Issues 22, 23 and 24 remain as proposed under Operating Costs but that a new Category entitled Compensation be added to the Issues List and that Issue 7.6 be mapped to this new category.

OPG's total compensation costs represent a significant expense for the company. AMPCO recognizes that there is no "line item" for compensation in OPG's application; rather, compensation costs are incorporated into other areas such as OM&A costs with respect to nuclear and hydroelectric operations. However, in AMPCO's view, compensation should be

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reviewed in totality as a stand-alone issue given the enormity of the costs and the importance of reviewing salaries, FTEs, pension costs etc. for OPG as a whole. OPG's Compensation and Benefits evidence at F4-3-1 reflects OPG's total workforce and the associated strategies to fulfill its mandate. Compensation was a stand-alone category/issue on the OEB-approved issues list for OPG's previous Payment Amounts application EB-2020-0290.

With respect to the Issue 1.3 (Has OPG responded appropriately to all relevant OEB directions from previous proceedings?) from OPG's list that has not been mapped to an issue in the OEB's Draft Issues List, AMPCO suggests that this issue becomes Issue 1. under a new heading "General" and the rest of the draft issues be renumbered accordingly.

Process

AMPCO appreciates the opportunity to comment on the draft hearing process timeline.

The OEB indicates the objective is to facilitate an efficient and rigorous proceeding within the OEB performance standards, which is 355 days for this proceeding. AMPCO understands and respects the importance of meeting the OEB's performance standards, however, given the importance, complexity and magnitude of OPG's current application, AMPCO also believes some flexibility with respect to timelines may be required to facilitate more meaningful review and input from participants to the benefit of the overall process.

AMPCO has reviewed the draft submissions of Consumers Council of Canada (CCC) and supports the revised timelines for interrogatories (March 25, 2026) and the Technical Conference (week of June 1, 2026) for the reasons identified. AMPCO believes this is a fair proposal given the current regulatory calendar. Like CCC, AMPCO does not intend to oppose OPG's proposed effective date of January 1, 2027.

Evidence

AMPCO is not proposing to file any evidence.

Best Regards,

A handwritten signature in black ink that reads "Shelley Grace". The signature is written in a cursive, flowing style.

AMPCO Consultant

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