



February 27, 2026

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

**Re: Ontario Power Generation Inc. and DNNP LP (OPG)  
OPG Payment Amounts– Redaction of Non-Relevant Information in Pre-filed Evidence  
EB-2025-0297**

Dear Mr. Murray:

In accordance with Procedural Order No. 1, dated February 5, 2026, below please find AMPCO's submissions regarding OPG's requests for confidential treatment of certain information filed in its application.

By letter dated December 12, 2025, OPG requested the OEB allow for Permanent Redaction for Non-Relevance of certain information from the public record pertaining to the DNNP Unit 1 Execution Phase Funding Release and Units 2-4 Definition Phase March 2025.<sup>1</sup>

The information includes detailed financial and scheduling information relating to units 2, 3 and 4 (Future Units) of the Darlington New Nuclear Project (DNNP), including, financial contingencies, expected interest and escalation, levelized cost of electricity (LCOE), and granular scheduling information beyond the projected DNNP completion year of 2035. OPG's position is "Because none of the Future Units will enter commercial operation or have any associated forecast inservice amounts entering rate base during the future rate period, the detailed information pertaining to the Future Units is beyond the scope of issues that will be decided as part of this proceeding, and accordingly, it will not provide any assistance to the Board or intervenors.

AMPCO strongly disagrees that the above information is irrelevant, out of scope, and of no assistance in the current proceeding:

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<sup>1</sup> OPG Letter Re: Request for Confidential Treatment of Information in Pre-filed Evidence, December 12, 2025, pp. 120-122

**Association of Major Power Consumers in Ontario**

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- The total project cost for all 4 units is \$21 billion.<sup>2</sup> There are a lot of firsts for the project. The project reflects a First-Of-A-Kind design. This is the first time that the capital budget for the DNNP will be before the OEB.<sup>3</sup> This is the first time customers have an opportunity to see the costs and scheduling information.
- Detailed information pertaining to Future Units will allow the OEB to properly assess the reasonableness of the Release Quality Estimate (RQE) for Unit 1 of approximately \$7.7 billion.<sup>4</sup>
- Unit 1 costs evaluated in this proceeding include scope common to all units in the four-unit facility, i.e. Common Scope Facilities costs necessary to support the deployment of all four planned SMRs such as Condenser Cooling Water intake and discharge structures, and common buildings such as administration, fabrication and security buildings. Information related to the future units is important for the OEB to consider, in assessing these common costs with scope that extends to Units 2-4.
- Through the Concurrent Cost Recovery (CCR) Mechanism, OPG is seeking approval of forecast CCR interest amounts related to the released funds for Future Units 2-4 for inclusion in DNNP LP's revenue requirements in the current rate term. Information on the Future Units is necessary to process this request.
- With respect to the LCOE (previously referred to as the Levelized Unit Energy Cost or LUEC), AMPCO notes that this information was available on the public record for the Darlington Refurbishment Program (DRP) in the EB-2016-0152 proceeding prior to these assets going in-service.<sup>5</sup>
- OEB staff notes, as does AMPCO, that the Applicants did not seek permanent redaction of similar information related to the Pickering Refurbishment Program, such as the LCOE, contingencies, and scheduling information beyond the term of this proceeding.

AMPCO members are interested in understanding the details of the entire SMR project and all of the costs and impacts, not just the Unit 1 in-service amounts which has little meaning to AMPCO members. The SMR project is a significant project with a significant cost that all electricity customers in the Province are being asked to pay for. Customers have a right to see detailed cost information beyond Unit 1. AMPCO submits the OEB should disallow OPG's request for the permanent redaction of information on Units 2, 3 and 4 on the basis the information is relevant, in-scope, and of value in the current proceeding. Further, AMPCO submits the LCOE for the DNNP should be disclosed publicly in the current proceeding as it was in EB-2016-0152, to allow for meaningful comparisons between generation projects.

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<sup>2</sup> D2-4-8 Attachment 1 p.1

<sup>3</sup> D2-4-8 p.17

<sup>4</sup> D2-4-8 p.1

<sup>5</sup> EB-2026-0152 D2-2-8 Attachment 1 p.2

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Best Regards,

A handwritten signature in grey ink that reads "Shelley Grice".

Shelley Grice  
Consultant  
AMPCO

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