

February 27, 2026

VIA RESS

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

Dear Mr. Murray:

**Re: Requirements of Ontario Regulation 53/05 (“O. Reg. 53/05”), Section 8.
EB-2025-0297 – 2027-2031 Payment Amounts Application**

Further to the EB-2025-0297 requested approval set out at Ex. A1-2-2, p. 10, DNNP GP Inc., as managing general partner on behalf of DNNP LP (the “DNNP generator”), requests that the Ontario Energy Board issue an order pursuant to section 8 of O. Reg. 53/05 for purposes of section 78.1 of the *Ontario Energy Board Act, 1998* (the “Act”) declaring that the DNNP generator has satisfied the conditions set out under section 8 of O. Reg. 53/05.

Section 8 of O. Reg. 53/05 states that Part III of the regulation (the Part pertaining to, among other things, establishing DNNP GP Inc. as a prescribed generator for the purposes of section 78.1 of the Act) applies on and after the effective date of an order made by the OEB specifying that the following conditions are met:

1. At least one unit of DNNP LP is held by a limited partner other than DNNP GP Inc.
2. The DNNP generator has entered into a lease with Ontario Power Generation Inc. with respect to the Darlington New Nuclear Project that provides for a lease term duration that is not less than the expected useful life of the DNNP Nuclear Generating Station.
3. The effective date of the lease referred to in paragraph 2 has been published on a publicly-accessible website.
4. The DNNP generator has incurred capital costs in respect of the Darlington New Nuclear Project.

As described below, the four conditions have been met as of December 31, 2025.

Condition 1: At least one unit of DNNP LP is held by a limited partner other than DNNP GP Inc.

As described at EB-2025-0297 Ex. A1-4-4, p. 1, DNNP LP is an Ontario limited partnership among 1001368516 Ontario Inc. (the initial limited partner), DNNP GP Inc. as managing general partner of DNNP LP, and OPG as general partner. The partnership was established on October 16, 2025. The DNNP LP Unitholders' Register as of December 31, 2025 is attached as Attachment 1. In addition to the two general partners, the register lists 1001368516 Ontario Inc. and Ontario Power Generation Inc. as common unit holders. This demonstrates that condition 1 has been met.

Condition 2: The DNNP generator has entered into a lease with Ontario Power Generation Inc. with respect to the Darlington New Nuclear Project that provides for a lease term duration that is not less than the expected useful life of the DNNP Nuclear Generating Station.

On December 29, 2025, DNNP GP Inc., as a general partner on behalf of DNNP LP ("Tenant"), entered into a lease with Ontario Power Generation Inc. ("Landlord") with respect to the Darlington New Nuclear Project that provides for a lease term duration that is not less than the expected useful life of the DNNP Nuclear Generating Station.

Under Article 2 of the lease agreement, the initial term of the lease is 20 years, ending on December 29, 2045. Article 2 further provides the Tenant with the option to renew the term of the lease for additional successive one year renewal periods until the date that is the earlier of: (a) the permanent shutdown of the last Unit comprising the Facility; and (b) the Term End Date. The lease agreement defines the Term End Date as December 31, 2110. However, if any of the DNNP units remain in operation on December 31, 2110, then the Term End Date is automatically extended until the date of the permanent shutdown of the facility.

The terms under Article 2 of the lease agreement provide for a lease term duration that is not less than the expected useful life of the DNNP Nuclear Generating Station and, thus, condition 2 was satisfied upon entering the lease on December 29, 2025.

Condition 3: The effective date of the lease referred to in paragraph 2 has been published on a publicly-accessible website.

This information is provided under a "DNNP Chronology" timeline on OPG's publicly-accessible website. A link to the web address can be found [HERE](#). This information was posted to opg.com on December 31, 2025, satisfying condition 3.

Condition 4: The DNNP generator has incurred capital costs in respect of the Darlington New Nuclear Project.

On December 31, 2025, OPG and DNNP LP entered into a contribution agreement pursuant to which OPG has been reimbursed for construction-in-progress costs in connection with the DNNP through the issuance of ownership units, satisfying condition 4.

As stated in the recitals of the contribution agreement, the agreement sets out terms and conditions for DNNP LP to acquire from OPG, all of OPG's right, title and interest in, to and under properties and assets related to the DNNP for the issuance by DNNP LP to OPG of one common unit in the capital of DNNP LP. Under section 6 of the agreement, it is further clarified that OPG is to be credited with such common unit having contributed to the capital of DNNP LP.

Under section 14(2)2i of O. Reg. 53/05, the OEB is instructed to accept the following as capital costs in determining the revenue requirement of DNNP LP:

- i. The following costs incurred by Ontario Power Generation Inc. in respect of the Darlington New Nuclear Project, to the extent that the Board is satisfied that the costs were prudently incurred:
 - A. Costs in respect of any asset transferred from Ontario Power Generation Inc. to the DNNP generator, as reflected in the audited schedule of costs that is approved by Ontario Power Generation Inc.'s board of directors as at the transfer date.
 - B. Costs in respect of any asset licensed by Ontario Power Generation Inc. to the DNNP generator, as reflected in the audited schedule of costs that is approved by Ontario Power Generation Inc.'s board of directors as at the licensing date.
 - C. Any other costs for which the DNNP generator has reimbursed Ontario Power Generation Inc., as reflected in the audited schedule of costs that is approved by Ontario Power Generation Inc.'s board of directors as at the reimbursement date.

Consistent with the requirements of section 14(2)2 of O. Reg. 53/05, the transfer of assets is a capital transaction. In exchange for the issuance of ownership units, DNNP LP has incurred capital costs in relation to DNNP. These ownership units and capital costs will be included in DNNP LP's audited financial statements for the year ended December 31, 2025, and the audited schedule of costs that is approved by Ontario Power Generation Inc.'s board of directors (per section 14(2)2i of O. Reg. 53/05).

Please contact me if you have any questions with this submission.

Yours truly,



Saba Zadeh

cc:

Evelyn Wong (OPG) via e-mail
Aimee Collier (OPG) via e-mail
Charles Keizer (Torys LLP) via e-mail

LIST OF ATTACHMENTS

Attachment 1: DNNP LP Unitholders' Register at December 31, 2025

DNNP LP

UNITHOLDERS' REGISTER

| DATE | NAME | NUMBER OF UNITS | CLASS OF UNITS |
|-------------------|-------------------------------|------------------------|-------------------------------|
| October 16, 2025 | DNNP GP Inc. | 1 | Managing General Partner Unit |
| October 16, 2025 | Ontario Power Generation Inc. | 1 | Ordinary General Partner Unit |
| October 16, 2025 | 1001368516 Ontario Inc. | 1 | Common Unit |
| December 31, 2025 | Ontario Power Generation Inc. | 1 | Common Unit |