

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998,
S.O. 1998, c.15 (Schedule. B);

AND IN THE MATTER OF an Application by Ontario Power
Generation Inc. (“**OPG**”) 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.

EB-2025-0297

INTERROGATORIES

OF

MINOGI CORP.

(“MC”)

March 25, 2026

Question: **A1-MC-1.**

- Reference:
- Exhibit A1, Tab 4, Schedule 1
 - [Buy Ontario Act \(Public Sector Procurement\), 2025](#), S.O. 2025, c. 27, Sched. 1 ("**Buy Ontario Act**")
 - Exhibit F3, Tab 1, Schedule 1
- a) Please confirm whether OPG has received any directives, guidance, policies, or formal communications under the Buy Ontario Act relevant to the 2027-2031 period.
- b) If yes to a), provide copies or summaries of such documents.
- c) If no to a), describe anticipated directives/guidance for 2027-2031 and related assumptions in the application.
- d) Please describe any plans, governance, or workstreams for *Buy Ontario Act* compliance during 2027-2031.

Question: **C1-MC-2.**

Reference: • Exhibit C1, Tab 1, Schedule 1

- a) Please confirm whether OPG has considered external equity participation, including participation by First Nations, as an alternative or complementary source of capital for future generation projects included in the Application.

- b) If yes to a), describe the extent to which such participation could:
 - (i) reduce reliance on ratepayer-funded capital;
 - (ii) diversify sources of financing; and
 - (iii) affect OPG's capital structure.

- c) If no to a), please explain why such participation has not been considered as part of OPG's capital planning and cost of capital determinations.

Question: C2-MC-3.

Reference: • Exhibit C2, Tab 1, Schedule 1

- a) Please identify all amounts included in the revenue requirement for 2027–2031 that relate to OPG's funding of, contributions to, or cost recovery associated with nuclear waste management, decommissioning, and/or NWMO-related activities ("**NWMO Activities**").
- b) For each amount identified in part a), please describe the extent to which OPG has visibility into, oversight over, or influence on the procurement practices associated with NWMO Activities.
- c) Please indicate whether OPG has considered how Ontario or Canadian procurement preferences, as applicable to OPG, are addressed in relation to NWMO Activities reflected in OPG's revenue requirement.
- d) Please indicate whether OPG tracks, or plans to track, the extent to which NWMO Activities reflected in OPG's revenue requirement are awarded to First Nation rightsholder businesses located near facilities affected by the work.
- e) If the response to part d) is no, please describe any plans or options OPG has considered for tracking such metrics.

Question: D1-MC-4.

Reference: • Exhibit D1, Tab 1, Schedule 1

- a) Please describe the ownership structures for the following projects, including the percentage equity held by First Nation partners and the form of that equity (e.g., direct ownership, partnership, limited partnership, etc.):
- (iv) Lower Mattagami River Project;
 - (v) Peter Sutherland Sr. Generating Station; and
 - (vi) Lac Seul Generating Station.
- (together, the “**Projects**”)
- b) For each of the Projects please describe how the presence of First Nation equity affected:
- (i) project financing structure;
 - (ii) sources of capital; and
 - (iii) overall cost of capital.
- c) For each of the Projects, please indicate whether OPG has assessed the impact of First Nation equity participation on (i) construction risk; (ii) schedule risk; (iii) cost overrun risk; and (iv) financing risk. If such assessments have been undertaken, please provide them or summarize them and please indicate whether OPG has assessed whether First Nation equity participation reduced, increased, or had no impact on such risks.
- d) For each of the Projects, please describe whether First Nation equity participation resulted in: (i) a reduction in the amount of capital required to be financed by OPG; and (ii) a reduction in the amount of capital included in OPG’s rate base, and please quantify the impact of First Nation equity participation on the revenue requirement associated with each the Projects.
- e) Please indicate whether OPG has undertaken any analysis of the net ratepayer impact (positive, negative, or neutral) of First Nation equity participation for the Projects.

Question: D3-MC-5.

Reference:

- Exhibit D3, Tab 1, Schedule 1
- Exhibit F3, Tab 1, Schedule 1

- a) Please confirm whether OPG has undertaken any analyses of proximity-based sourcing effects on costs, schedule, or project execution risks associated with facility construction, maintenance, refurbishment, or related procurement activities during the 2027-2031 period.
- b) If yes to a), please provide such analyses.
- c) If no to a), confirm if such analyses were considered in application preparation and describe any plans.
- d) Please confirm assessments of whether procurement from businesses near OPG facilities could affect: (i) transportation/logistics costs; (ii) mobilization costs; (iii) standby/delay costs; (iv) schedule risk; (v) other execution costs.

Question: D3-MC-6.

Reference:

- Exhibit D3, Tab 1, Schedule 1
- Exhibit F2, Tab 1, Schedule 1

- a) Please describe procurement design alternatives considered for 2027-2031 to support local or First Nation rightsholder business participation.
- b) Please confirm consideration of:
 - (i) unbundling contracts;
 - (ii) minimum contract size thresholds;
 - (iii) prequalification for local suppliers;
 - (iv) subcontracting transparency;
 - (v) local supplier outreach; or
 - (vi) category-specific streams for site services, logistics, maintenance, monitoring.
- c) For each alternative in b): (i) describe the alternative; (ii) confirm adoption or provide reasons for not adopting the alternative; and (iv) provide any cost/schedule/safety/risk analysis.
- d) Please describe the specific similarities and differences between OPG's procurement approach with rightsholder First Nations engaged with OPG on joint hydropower projects in their treaty areas and rightsholder First Nations engaged with OPG on nuclear projects in their treaty areas.

Question: D3-MC-7.

Reference:

- Exhibit D3, Tab 1, Schedule 1
- Exhibit D2, Tab 1, Schedule 1

- a) Please describe any procurement design alternatives considered for 2027-2031 to support local or First Nation rightsholder business participation.
- b) Please confirm consideration of:
 - (i) unbundling contracts;
 - (ii) minimum contract size thresholds;
 - (iii) prequalification for local suppliers;
 - (iv) subcontracting transparency;
 - (v) local supplier outreach; or
 - (vi) category-specific streams for site services, logistics, maintenance, monitoring.
- c) For each alternative in b): (i) describe the alternative; (ii) confirm adoption or provide reasons for not adopting the alternative; and (iv) provide any cost/schedule/safety/risk analysis.
- d) Please describe the specific similarities and differences between OPG's procurement approach with rightsholder First Nations engaged with OPG on joint hydropower projects in their treaty areas and rightsholder First Nations engaged with OPG on nuclear projects in their treaty areas.

Question: F2-MC-8.

- Reference:
- Exhibit F2, Tab 2, Schedule 1
 - Exhibit F2, Tab 3
 - Exhibit F2, Tab 6
 - Exhibit F2, Tab 7, Schedule 1
 - Exhibit F2, Tab 8, Schedule 1
 - Exhibit F3, Tab 3, Schedules 1 and 2

- a) Please identify all forecast OM&A, corporate, HR, IT, or compliance costs for implementing, administering, monitoring, or reporting on procurement requirements, including *Buy Ontario Act*.
- b) For each cost identified in part a), please provide:
- (i) amounts by year for 2027 to 2031;
 - (ii) business unit/cost centre;
 - (iii) nature of cost; and
 - (iv) rationale for cost.
- c) Please outline outreach measures for local and First Nation rightsholder suppliers near Pickering and Darlington to ensure visibility and practical access to procurement opportunities.
- d) Please provide any internal analyses on local and First Nation rightsholder participation reducing mobilization, logistics, or schedule risks for Pickering refurbishment or DNNP.

Question: **F3- MC-9.**

Reference:

- Exhibit F3, Tab 3, Schedule 1
- Exhibit A1, Tab 3, Schedule 1, Section 1.1

- a) Please confirm if OPG proposes procurement-related reporting, scorecards, or record-keeping in this proceeding.
- b) If yes to a), please describe.
- c) If no to a), please confirm OPG's ability to report annually at facility/project level on spend with Ontario, Canadian, local or First Nation rightsholder suppliers and provide details.
- d) Please confirm plans to implement such reporting for 2027-2031.

Question: **F3-MC-10.**

Reference: • Exhibit F3, Tab 3, Schedule 1
 • Exhibit F2, Schedule 5

- a) Please confirm if procurement for on-site storage, repackaging, monitoring, upgrades, or site waste management services at Pickering and Darlington follows standard OPG processes; describe any specific strategies for extended scenarios.

- b) For each of the categories identified in a), please confirm and describe assessments of suitability for local or First Nation rightsholder businesses.

Question: **F3-MC-11.**

Reference:

- Exhibit F3, Tab 1, Schedule 1
- Exhibit F3, Tab 1, Schedule 1, Attachment 1
- Exhibit A2, Tab 1, Schedule 1, Attachment 4

- a) Please identify 2023–present OPG public statements, commitments, policies, or strategies on First Nation rightsholder economic inclusion, procurement, or partnerships.
- b) Please describe the influence of the OPG public statements, commitments, policies, or strategies identified in a) on application assumptions, forecasts, and/or reporting.
- c) Please describe any goals or tracking for local/First Nation rightsholder procurement in 2027-2031

Question: F3-MC-12.

Reference:

- Exhibit F3, Tab 1, Schedule 1
- Exhibit A2, Tab 1, Schedule 1, Attachment 4
- Exhibit D3, Tab 1, Schedule 1
- Exhibit D2, Tab 1, Schedule 1

- a) Please identify treaty lands relevant to Pickering, Darlington, and waste facilities for OPG's procurement/community purposes.
- b) Please confirm use of location, proximity, treaty, or rightsholder criteria in identifying businesses for outreach/procurement.
- c) Please provide total annual Pickering and Darlington procurement spending (2020–present) that OPG considers suitable for local or First Nation rightsholder sourcing.
- d) Please describe the methodology for suitability determination pursuant to the response to c).

Question: F3-MC-13.

Reference:

- Exhibit F3, Tab 1, Schedule 1
- Exhibit F3, Tab 1, Schedule 1, Attachment 1
- Exhibit A2, Tab 2, Schedule 1
- Exhibit D3, Tab 1, Schedule 1

- a) Please confirm consideration of a procurement framework by 2026/2027-2031 for First Nation rightsholder participation near nuclear facilities.
- b) If yes to a), please describe:
- (i) the status of that consideration;
 - (ii) any proposed timeline;
 - (iii) any internal approvals required; and
 - (iv) any reporting or tracking metrics.
- c) If no to a), please describe OPG's rationale for not considering such a procurement framework.
- d) Please identify any legal, operational, and/or safety considerations for such a framework

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
25th day of March, 2026



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