



March 25, 2026

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

Dear Mr. Murray,

**RE: EB-2025-0297 Ontario Power Generation Inc. and DNNP Payment Amounts  
CCMBC Interrogatories**

Attached are the interrogatories of Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC) to Ontario Power Generation and DNNP LP in the EB-2025-0297 Payment Amounts proceeding.

Respectfully submitted on behalf of CCMBC.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.

cc. Catherine Swift (CCMBC)  
Parties to the Proceeding

**EB-2025-0297**  
**Ontario Power Generation Inc. and DNNP LP**  
**2027-2031 Payment Amounts**

**CCMBC Interrogatories**

**March 25, 2026**

**F1-CCMBC-1**

**Reference:** F1-1-1, Table 1, Operating Costs Summary - Regulated Hydroelectric

**Questions:**

- a) Please explain the reason for the large increase in Project OM&A from \$90.5 million in 2026 Budget to \$127.0 million in the 2027 Plan.
- b) Why did the Allocation of Corporate Costs decrease from \$50.1 million in 2016 to \$38.4 million in 2020 and then increase each year to \$55.3 million in 2027?

**F1-CCMBC-2**

**Reference:** F1-1-1, Table 2b, Regulated Hydroelectric Staff Summary – Regular and Non-Regular (FTEs)<sup>1</sup> – 2020-2031, and A1-3-2, page 11

**Question:**

- a) Considering that OPG has not built or acquired any new hydroelectric stations, please explain the reasons for the increase of 430.1 FTEs or 39,4% in Regulated Hydroelectric Staff from 1091.4 FTEs in 2020 to 1521.5 FTEs in the 2027 Plan.
- b) Please confirm that the increase in FTEs is one of the main reasons for the negative productivity of Regulated Hydroelectric of -0.40% and -1.01%.

**F3-CCMBC-3**

**Reference:** F3-1-1, page 48

**Preamble:** “WTW undertook a comparison of OPG’s wages to those provided by Bruce Power. The results of this comparison are captured in Attachment 4, and a summary is provided below in Figure 13. The analysis shows that Bruce Power’s unionized wages are 24% higher for PWU represented positions and 9% higher for Society-represented positions. For licensed nuclear roles, such as the Control Room Shift Supervisor (Society), Bruce Power’s unionized wages are up to 20% higher.”

**Questions:**

- a) How many employees have left OPG for jobs with Bruce Power over the past five years?

- b) Is OPG concerned that it may be losing employees to Bruce Power?
- c) Did WTW undertake a comparison of OPG's pensions, benefits and OPEB's to those provided by Bruce Power? If the answer is yes, please file it. If the answer is no, please explain why not.

**F4-CCMBC-4**

**Reference:** F4-3-1, Page 48, Figure 13 – Comparison of OPG and Bruce PWU and Society Base Salary

**Questions:**

- a) Please confirm that Figure 13 does not include pensions and benefits.
- b) Please file a figure similar to Figure 13 that compares total compensation including salary, overtime, pensions, and benefits including OPEBs.

**F4-CCMBC-5**

**Reference:** F4-3-1, Attachment 1, Page 1, FTE, Compensation and Benefit Information for OPG's Nuclear Regulated Facilities ("Appendix 2k")

**Question:**

Please add a line to the table showing compensation and benefit information per FTE for Nuclear Regulated Facilities.

**F4-CCMBC-6**

**Reference:** F4-3-1, Attachment 1, Page 2, FTE, Compensation and Benefit Information for OPG's DNNP LP Regulated Facilities ("Appendix 2k")

**Question:**

Please add a line to the table showing compensation and benefit information per FTE for DNNP LP Regulated Facilities.

**F4-CCMBC-7**

**Reference:** F4-3-1, Attachment 1, Page 3, FTE, Compensation and Benefit Information for OPG's Hydroelectric Regulated Facilities ("Appendix 2k")

**Question:**

Please add a line to the table showing compensation and benefit information per FTE for Hydroelectric Regulated Facilities.

**F4-CCMBC-8**

**Reference:** F4-3-1, Attachment 2, Southlea Report, Page 18, Recommendations

**Question:**

Did OPG accept and implement all of Southlea's recommendations. If the answer is no, please list recommendations that OPG rejected and / or did not implement?

**F4-CCMBC-9**

**Reference:** F4-3-1, Attachment 3, Page 5, Comparator Groups, and page 33 Nuclear Authorized – Executives and Non-Executives and page 34 Pension & Benefits Analysis

**Questions:**

- a) Why were different comparator organizations selected for Nuclear Authorized – Executives and Non-Executives and Pension & Benefits Analysis?
- b) For example, why was Tennessee Valley Authority (TVA) selected as a comparator organization for the Nuclear Authorized – Executives and Non-Executives but not for the Non-Executives and Pension & Benefits Analysis?
- c) Is WTW aware that Concentric did not include TVA in its proxy group of utilities (C1-1-1, Attachment 1, Page 14 and Pages 103-109, Concentric Report)?

**F4-CCMBC-10**

**Reference:** F4-3-1, Attachment 4, Page 3, 2024 Base Salary Comparison | Society of United Professionals

**Questions:**

- a) Considering that the base salary for Control Room Shift Supervisor, Training Supervisor is 20% lower at OPG than at Bruce Power, are employees in that category leaving OPG to work for Bruce Power?
- b) What is the difference in pension and benefits between OPG and Bruce Power for employees in that category?
- c) Are there any differences in job descriptions between OPG and Bruce Power for employees in that category?

**F4-CCMBC-11**

**Reference:** F4-3-2, Page 1, Pension and Other Post-Employment Benefit Costs

**Questions:**

- a) Does OPG agree that the vast majority of ratepayers, and in particular younger ratepayers, will never receive pensions and other benefits (if they receive pensions and other benefits at all) anywhere approaching the value of the pensions and other benefits described in this section that are allocated for OPG employees? If OPG does not agree with that statement, please provide evidence to support why OPG believes young ratepayers could expect to receive similar pensions and benefits to OPG employees.
  
- b) How would OPG convince young ratepayers just starting out in their careers that they should accept paying higher rates so that OPG employees can receive lucrative pensions and benefits that these ratepayers are unlikely to receive in their lifetimes?