



BY EMAIL and RESS

April 27, 2026

Ritchie Murray, Registrar
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario, M4P 1E4

**Re: EB-2025-0297- Ontario Power Generation Inc. 2027-2031 - Interrogatories
Resolution (and/or Motions) Day(s)**

Dear Mr. Murray:

Jupiter is the energy consultant to the Ontario Association of Physical Plant Administrators ("OAPPA"). Pursuant to Procedural Order No. 2, below is a description of the refused interrogatory, which OAPPA proposes to address at the Interrogatories Resolution (and/or Motions) Day, including the rationale for why the information is relevant and should be produced by Ontario Power Generation Inc. ("OPG").

1. OAPPA Interrogatory D2-OAPPA-6

Ref: Exhibit D2 / Tab 4 / Schedule 1 / Page 2

"The BWRX-300 SMR is a 300 MW water-cooled, natural circulation design with passive safety systems"

- a) Please describe in detail, how the passive safety systems of the SMR function. Please confirm and detail redundancies, systems, shut down procedures, emergency procedures including containment and all necessary measures enabled, to prevent a melt-down of the reactors.
- b) Are there any "reactive" safety measures or systems? Please describe in detail if so.
- c) Please compare similarities and differences of the passive, and other, safety systems to known, existing Candu-reactor safety systems, including the requirement (or lack thereof) for a Vacuum Building.

OPG's Response

"Nuclear safety is a matter for the Canadian Nuclear Safety Commission, and therefore the Applicants decline to provide the requested information on the basis of relevance. The information requested does not form part of any requested approvals in this application and is not relevant to deciding any issue on the approved Issues List in this application".

OAPPA's Response

OPG is seeking OEB approval for an estimated \$6.6B from rate payers during the Application period to construct and operate a new nuclear facility, that necessarily includes safety, containment and waste storage facilities. The DNNP employs a completely new technology that has wholly different safety systems and containment features not previously presented to the Board. The cost of these [unique] safety systems has a direct impact and consequence to Issues 10, 16, 25, 38 and 41 and an indirect consequence on Issue 3. OAPPA does not dispute the CNSC's role in licencing OPG or otherwise enforcing nuclear safety conditions, however, it does not impute OPG's liabilities and responsibilities for designing, building, maintaining and operating those safety systems, or does it consider the CSNC being responsible for determining those costs. Moreover, while OPG has made significant progress, it has not fully completed the implementations required for the CNSC's REGDOC-2.5.2 (Design of Reactor Facilities: Nuclear Power Plants). Finally, and to be clear, OAPPA does not propose challenging any design decisions, it seeks only to better understand how the non-Candu-proven-and-familiar safety systems operate, beyond any evidence already provided in Ex. D2-04, so that it can better understand how the Application costs are being informed by them.

Yours truly,

Scott A Walker

Scott Walker, MBA, P.Eng.

Principal, President & CEO

Jupiter Energy Advisors Inc.

For OAPPA