

IN THE MATTER OF the *Ontario Energy Board Act*, 1998;
AND IN THE MATTER OF an Application by Ontario Power Generation Inc. 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

April 27, 2026

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

Re: EB-2025-0297 – Intervenor Motions Regarding Refused Interrogatories (F3-Pinto-001 through -006)

Dear Registrar:

As an Intervenor in the above-noted proceeding, I respectfully submit a package of **five motions** arising from Ontario Power Generation Inc.'s ("OPG") responses to Interrogatories **F3-Pinto-001 through F3-Pinto-006**.

In its Interrogatory Responses, OPG declined to provide substantive answers to those interrogatories on the basis that the requests were overly broad, unreasonably onerous, and/or not material to the issues in this proceeding. In order to preserve the ability to address those refusals within the procedural framework established by the Board, the Intervenor has filed motions calibrated to the refused interrogatories, as consolidated and narrowed where appropriate.

The Intervenor emphasizes that these motions are advanced on a **without-prejudice basis** and with the expectation that some or all may be **narrowed further, consolidated, or withdrawn** following discussion with OPG and guidance from the Board at the **April 28, 2026 preparatory meeting**. The Intervenor remains committed to working cooperatively with OPG to rationalize the matters requiring adjudication and to minimize both the number and scope of motions ultimately advanced to Motions Day.

OPG's responses to the referenced interrogatories were partial, non-responsive, or silent on several material subjects relevant to the Board's review of payment amounts and OPG's proposed **2027–2031** plan. To address these gaps in a focused and proportionate manner, each Motion has been **carefully narrowed** to a defined subject area and a **consistent time period (January 1, 2023 through December 31, 2025)**, with explicit accommodations for confidentiality where appropriate. Across the Motions, the Intervenor seeks only **summary-level records, narrative explanations,**

representative examples, or confirmations of non-existence, rather than exhaustive documentary production.

In brief:

- **Motion 1** seeks targeted summary information and representative oversight records relating to prolonged life-safety or code-critical maintenance deferrals at selected Corporate Real Estate's support impacting regulated operations, to assess internal controls, risk escalation, safety oversight, and potential cost implications.
- **Motion 2** requests high-level information regarding affiliate governance structures and conflict-of-interest controls, using Laurentis Energy Partners as a representative case study, to assess whether OPG's affiliate governance framework adequately protects the regulated business.
- **Motion 3** seeks summary-level information regarding the application of OPG's Code of Business Conduct and related internal controls in a non-routine staffing or engagement scenario involving an unregulated affiliate, in order to test whether governance and ethical safeguards operate effectively in practice.
- **Motion 4** addresses the engagement of contractor resources through an unregulated affiliate and the related pricing, cost allocation, and oversight controls, to assess compliance with the Affiliate Relationships Code and prudent procurement principles.
- **Motion 5** focuses on parent-level oversight of affiliate management and human-resources stability, as well as the extent to which OPG's Internal Audit, Enterprise Risk Management, and Board committees reviewed and addressed affiliate-related governance, risk, and control issues raised in Interrogatories F3-Pinto-001 through -006.

Each Motion is tied directly to the issues identified by the Board in Procedural Order No. 2 and is confined to matters within the OEB's jurisdiction. In particular, the Motions engage the Board's issues relating to Operating Costs (including OM&A, taxes, and human resources), internal controls and governance (Issues 11–16), risk identification and management, cost control and efficiency, cost allocation and affiliate transactions (Issue 26), and, where applicable, reliability, safety, and capital cost forecasting. Consistent with Procedural Order No. 3, the Motions are narrowly focused on assessing the prudence of costs and the governance frameworks supporting them, with a view to ensuring that only just and reasonable amounts are borne by ratepayers. Where appropriate, OPG may satisfy certain elements of the Motions through executive-level summaries, narrative explanations, or explicit confirmation that no responsive records exist, provided such responses are sufficient to allow the Board to assess compliance with the applicable issues.

The Intervenor respectfully requests that the Board order OPG to conduct a reasonable search and provide the requested summaries or confirmations within the timeframes specified in each Motion (**14 days**, or **21 days** for Motion 5). Granting these motions will either corroborate OPG's evidence through its own oversight outputs or identify targeted areas warranting closer scrutiny, in either case enhancing transparency and supporting the Board's determination of just and reasonable payment amounts.

Thank you for your consideration. The Intervenor remains available to assist with any procedural sequencing or direction the Board deems appropriate.

Respectfully submitted,

Keith F. Pinto

Intervenor (EB-2025-0297)

647-544-7341

Motion 1

Production of Targeted Facilities Maintenance Backlog and Risk Oversight Records

(IRs F3Pinto001 and F3Pinto002)

Relief Sought

The Intervenor respectfully requests that the Ontario Energy Board order Ontario Power Generation Inc. ("OPG") to provide full and adequate responses to Interrogatories **F3Pinto001** and **F3Pinto002**, as narrowed and clarified below.

Specifically, the Intervenor seeks **summary-level records and representative oversight documentation** related to **known or potential life-safety and code-critical facilities maintenance deferrals** at selected OPG facilities during the period **2023 through 2025**, where such deferrals could reasonably give rise to cost, risk, or reliability implications within the 2027–2031 rate term.

The absence of such records, if confirmed, may be relevant to the Board's assessment of the adequacy of OPG's internal control framework and the prudence of its practices.

Scope of Requested Production (Narrowed)

Corporate Real Estate ("CRE"), with a focused sample, is proposed for representative examples sufficient to demonstrate whether such impairments were isolated or indicative of recurring or systemic conditions during the period. There is nothing uniquely problematic about CRE as compared to other OPG support organizations; rather, it provides a concrete and material example through which the Board can assess whether OPG's governance framework operates adequately in relation to the regulated assets supported.

The requested production is limited as follows:

1. Time Period

- **January 1, 2023 through December 31, 2025**

2. CRE Nuclear Support Facilities (Targeted)

- **Whitby Nuclear Warehouse** (primary focus)
- **Pickering Learning Center ("PLC")**
- **Darlington Learning Center ("DLC")**
- **Darlington Energy Complex ("DEC")**
- **Wesleyville G.S. ("WGS")**

3. Systems and Issues (Defined)

Only **life-safety or code-critical building systems**, including but not limited to:

- Fire protection and suppression systems (e.g., sprinkler systems, fire pumps, alarms)
- Emergency power or lighting systems
- Ventilation or smoke control systems required for code compliance
- Any system required to be operational, certified, or inspected under applicable fire or building codes

4. Trigger Threshold (Objective)

Only where:

- A system or component was **out of service, noncompliant, uncertified, impaired, recalled, or otherwise deficient**
- **For any continuous period exceeding three (3) months**, and
- **Without documented interim mitigation measures** (or where mitigation was limited to administrative or temporary controls)

Specific Records Requested

A. Maintenance Backlog and Condition Summary (2023–2025)

For each year 2023, 2024, and 2025, OPG shall provide a **summary table** (one per year) identifying:

- The number of outstanding maintenance deficiencies meeting the criteria above at the identified facilities;
- The system type involved (e.g., sprinkler system, fire alarm);
- The duration of the deficiency (in months);
- Whether the deficiency was classified by OPG as safety-critical, code-critical, or otherwise requiring elevated oversight under OPG's maintenance or equipment health rating framework; and
- The status at year-end (open, mitigated, or resolved).

If backlog metrics were not formally tracked in this manner, OPG shall:

- Explicitly state that such summary metrics do not exist, and
- Describe what alternative records, processes, or indicators were used to monitor prolonged facilities impairments.

OPG shall identify the role(s) responsible for maintaining, reviewing, and escalating this information.

Where the requested summary metrics are not maintained in the form requested, OPG shall provide the closest available equivalent information and explain how prolonged impairments are identified, tracked, and escalated in practice, including any systems or indicators used for that purpose.

B. Exception Reports and Risk Oversight Records (Representative)

Confirm whether any instance meeting the defined triggering scenario occurred during 2023–2025; If no such instance occurred, confirm this explicitly and no further response is required for this section.

OPG shall produce **representative examples** (not exhaustive production) of any records from 2023–2025 that flagged or escalated prolonged life-safety or code-critical facilities impairments at the identified facilities, including:

- Maintenance or SCR exception reports
- Facilities condition exception logs
- Risk register entries
- Dashboards or management summary reports
- Committee briefing materials where such issues were discussed

This production may be satisfied by:

- **No more than one representative report or extract per year per facility**, and
- **Only those portions** that reference prolonged or unresolved deficiencies meeting the criteria above.

If no such records exist, OPG shall explicitly confirm that fact and explain why such records were not maintained, including what alternative processes were relied upon. OPG shall identify the role(s) responsible for producing, reviewing, and acting on such reports.

C. Whitby Warehouse – Fire Protection Deficiency (Specific Example)

Confirm whether any such impairment occurred during 2023–2025; if not, confirm that explicitly and no further response is required for this section.

With respect to any **Whitby Warehouse fire-protection system impairment** referenced in IR **F3Pinto002**, which involved any impairment of the fire protection system at the Whitby warehouse during 2023–2025, if such an impairment occurred:

OPG shall provide:

- Confirmation of whether this impairment was:
 - Recorded in any maintenance system, condition assessment, or exception report;
 - Captured in any risk register or escalated to management committees; or
 - Subject to any formal risk acceptance or deferral decision.
- Copies of, or excerpts from, **any records** (maintenance summaries, risk logs, extent of condition, committee materials) evidencing how the issue was monitored, escalated, mitigated, or accepted during 2023–2025.

If no such escalation or risk record exists, OPG shall explicitly confirm that fact on the record and explain why the impairment was not escalated or recorded in oversight mechanisms.

OPG shall identify the role(s) responsible for monitoring, escalating, or accepting such conditions.

D. Building Condition Reports – Whitby Warehouse

OPG shall produce the **annual Building Condition Reports** (or equivalent facilities condition assessments) for the **Whitby Warehouse** for:

- 2023
- 2024
- 2025

If such reports do not exist, OPG shall explain why formal, best practice, assessments were not conducted or maintained, including what alternative assessment processes were relied upon, and identify the role(s) responsible for this function.

E. System Governance and Review (Limited)

Confirm whether any formal review, audit, or post-implementation assessment occurred during 2023–2025; if none occurred, confirm that explicitly and no further response is required for this section.

OPG shall state whether, during 2023–2025:

- Any formal review, audit, or post-implementation assessment was conducted relating to:
 - Facilities maintenance backlog management; or
 - The effectiveness of the CRE system(s) used to track prolonged facilities impairments.

If such a review exists, OPG shall provide the **executive summary or key findings**. If such records do not exist, OPG shall explicitly confirm that fact and explain why such records were not maintained, including what alternative processes were relied upon, and identify the role(s) responsible for oversight.

F. Incident Review, External Orders, and Corrective Actions (Whitby Warehouse)

With respect to the prolonged fire-protection system impairment at the Whitby Nuclear Warehouse referenced in IR F3Pinto002, OPG shall state whether, during 2023–2025:

- Any external authority (including a municipal Fire Department or fire prevention authority) issued:
 - an order,
 - directive,
 - notice of violation, or

- written finding relating to the fire-protection system impairment at the Whitby Warehouse.

If so, OPG shall produce copies of such orders or notices and any records evidencing OPG's response or compliance.

- Any internal investigation, incident review, or root-cause analysis was conducted in relation to the prolonged impairment. If so, OPG shall:
 - identify the type of review conducted;
 - state the date and scope of the review;
 - state the operational impacts on the regulated business in the event of both (a) a spurious deluge, and, (b) absence of suppression in the event of fire;
 - produce the executive summary, findings, extent of condition, or conclusions, including any identified causes and recommended corrective actions.
- Any corrective or preventive actions were identified or implemented as a result of the impairment, including changes to:
 - maintenance prioritization,
 - resource allocation,
 - escalation thresholds, or
 - governance or oversight processes.

If no such investigation, review, or corrective action record exists, OPG shall explicitly confirm that fact and explain why such records were not maintained, including what alternative processes were relied upon.

Relevance and Materiality

The requested information is directly relevant to:

Motion 1 concerns OPG's deferral of safety-critical maintenance work and the adequacy of the internal controls governing those deferrals. These matters directly engage the PO2 issues relating to the prudence of OM&A and capital sustainment expenditures, as well as the effectiveness of internal controls and risk management frameworks supporting those expenditures. Decisions to defer maintenance (particularly where safety-critical and regulated assets are involved) have a direct bearing on whether costs incurred (or avoided) are prudent and whether risks are being inappropriately transferred to future periods and, ultimately, to ratepayers. In Procedural Order No. 3, the Board "acknowledged the relevance of internal control issues", including a focus on governance matters, as not raised by other intervenors. Motion 1 therefore raises issues that are squarely relevant and material to the Board's assessment of prudence and cost recovery under PO2.

The presence or absence of effective escalation and mitigation practices directly informs whether future OM&A or capital expenditures may reflect avoidable cost increases arising from deferred or unmanaged risk.

Extended safety-system impairments may give rise to emergency OM&A spending or accelerated capital investment during the 2027–2031 period. Prolonged deferral of life-safety or code-critical maintenance can result in:

- Increased future OM&A or capital costs
- Emergency or reactive expenditures
- Regulatory noncompliance risk
- Increased operational, nuclear, and conventional safety risk
- Risk to Public Safety

Understanding whether such deferrals occurred during 2023–2025, and how they were managed or escalated internally, assists the Board in assessing whether OPG’s proposed 2027–2031 spending appropriately reflects the condition of its facilities and the effectiveness of its internal controls.

Why OPG’s Refusal Is Unjustified

OPG declined to answer IRs F3Pinto001 and F3Pinto002 on the basis that they were overly broad, burdensome, or immaterial. As narrowed by this Motion:

- The request is **limited in time (3 years)**,
- **Focused on a small number of facilities**,
- **Triggered only by prolonged life-safety or code-critical impairments**, and
- Satisfied by **summary tables and representative records**, not exhaustive production.

The Intervenor is not seeking to intrude into immaterial detail. Rather, the Motion seeks evidence of whether OPG followed ordinary facilities governance and risk oversight practices for prolonged impairments that could reasonably give rise to cost, risk, or reliability implications within the 2027–2031 rate term. The information requested is limited in scope and can be provided through high-level summaries, confirmations, and representative examples. It should impose little burden on OPG, as it largely involves confirming the existence and application of records and oversight outputs that should reasonably form part of ordinary facilities governance and risk oversight. Ensuring that OPG’s internal control and escalation mechanisms functioned as intended in this context is relevant to the Board’s ability to set just and reasonable payment amounts.

Confidentiality and Proportionality

The Intervenor does not seek sensitive security details. If necessary, OPG may redact sensitive technical details, anonymize any immaterial identifiers, and may file responsive materials (or portions thereof) in confidence, consistent with the OEB’s Practice Direction on Confidential Filings. The Motion seeks primarily summaries or confirmations, rather than extensive documentation, ensuring that the response can be provided efficiently and without undue burden.

Requested Order

Where OPG states that no responsive records exist, OPG shall also describe, with sufficient specificity, the processes, systems, reporting structures, and responsible roles through which the underlying activity, risk, or control function was monitored, managed, and overseen during the relevant period, such that the Board can assess whether the function was effectively performed in practice.

The Intervenor respectfully requests that the Board order OPG to produce, within **14 days**, the materials described above, limited to the defined scope and time period.

If any requested record does not exist, OPG shall explicitly confirm that fact and describe what alternative records or processes are used in its place. Where the requested information is not available in the precise form requested, OPG shall provide the information in the best available form, including representative samples where appropriate.

Motion 2

Production of Targeted Affiliate Governance and Conflict-of-Interest Information

(IR F3Pinto003)

Relief Sought

The Intervenor respectfully requests that the Ontario Energy Board order Ontario Power Generation Inc. ("OPG") to provide a **full and adequate response** to Interrogatory **F3Pinto003**, as narrowed and clarified below.

The Intervenor seeks **summary-level governance, conflict-of-interest, and oversight information** sufficient to allow the Board to assess whether OPG's governance arrangements with its unregulated affiliate **Laurentis Energy Partners** ("Laurentis") adequately protect the regulated business and ratepayers from conflicted decision-making, cross-subsidization, or diversion of regulated resources.

Laurentis is proposed as a **representative case study**. There is nothing uniquely problematic about Laurentis as compared to other OPG affiliates; rather, it provides a concrete and material example through which the Board can assess whether OPG's affiliate governance framework operates effectively in practice.

The absence of such records, if confirmed, may be relevant to the Board's assessment of the adequacy of OPG's internal control framework and the prudence of its practices.

Scope of Requested Production (Narrowed)

1. Time Period

- **January 1, 2023 through December 31, 2025**

2. Affiliate in Scope

- **Laurentis Energy Partners**, including its interactions with:
 - OPG's regulated business units, and
 - OPG corporate governance and executive oversight structures.

3. Subject Matter (Defined)

Only information relating to:

- Governance and oversight structure
- Overlapping executive or board-level roles
- Conflict-of-interest identification and mitigation
- Formal coordination or decision-making interfaces between OPG and Laurentis

Background

Interrogatory **F3Pinto003** requested information regarding the governance safeguards and conflict-of-interest controls OPG relies upon to ensure that its interactions with unregulated affiliates do not adversely affect its regulated operations.

OPG refused to respond, asserting that affiliate governance is outside the scope of this payment amounts proceeding.

Specific Records Requested

A. Laurentis Governance Structure (Summary)

OPG shall provide a **high-level governance summary** for Laurentis during 2023–2025, including:

- Whether Laurentis has its own board of directors and executive leadership;
- The role of OPG executives or directors in Laurentis governance, including any reserved authorities;
- The relationship between OPG's President and CEO and Laurentis governance (e.g., board chair or oversight roles).

This may be satisfied by a simplified organizational chart or narrative description. If such information does not exist, OPG shall explicitly confirm that fact, explain why governance structures were not documented or maintained, and identify the role(s) responsible for this information.

B. Cross-Appointments and Dual Roles

Confirm whether any individuals concurrently held the listed roles during 2023–2025; if none, confirm that explicitly and no further response is required for this section.

OPG shall identify any instances during 2023–2025 where individuals concurrently held:

- Senior executive or board-level positions at OPG, and
- Senior executive or board-level positions at Laurentis.

This includes, for clarity, whether:

- Any President and CEO of OPG also held governance roles at Laurentis; and
- Any Senior executives or OPG ELT members responsible for **regulated business units** (including nuclear-related or nuclear-waste functions) who also held roles or oversight responsibilities at Laurentis.

For each instance, OPG shall state:

- The titles held (individual names may be anonymized);

- Whether a conflict-of-interest disclosure was required or made; and
- What mitigation measures, if any, were applied (e.g., recusal, delegation, independent oversight).

If no such instances exist, OPG shall explain why such arrangements did not arise or were not recorded and identify the role(s) responsible for oversight.

C. Conflict-of-Interest Policies (Limited)

OPG shall provide the relevant sections of its:

- Code of Business Conduct, and
- Any specific policies or procedures addressing:
 - conflicts of interest,
 - affiliate interactions, and
 - dual executive or board roles.

If necessary, these materials may be filed in confidence or summarized. If such policies or procedures do not exist or are silent on these matters, OPG shall explain why and identify what alternative controls were relied upon, and the role(s) responsible.

D. Inter-Company Coordination and Interfaces

OPG shall state whether, during 2023–2025, any **formal committees, forums, or structured interfaces** existed between OPG and its affiliates (including Laurentis) to coordinate:

- strategy,
- staffing, labour relations or resource deployment,
- commercial offerings (including the marketing of OPG-developed tools, systems, or intellectual property), or
- work performed for regulated OPG business units.

If such interfaces existed, OPG shall provide:

- a high-level description of their purpose and membership, and
- how conflicts were identified and managed within those forums.

E. Application of Conflict Mitigation in Practice (Representative)

OPG shall describe, at a high level, how conflict-of-interest controls were applied in practice during 2023–2025 where overlapping governance or operational roles existed between OPG and Laurentis, and where roles were exposed to structure conflicts-of-interest.

This may be satisfied by:

- a narrative description of standard practices, or

- one or two anonymized examples.

If no such situations arose, OPG shall explicitly confirm that fact and explain why such records were not maintained, including what alternative processes were relied upon.

Relevance and Materiality

Motion 2 addresses the governance of OPG's affiliate relationships and the management of potential conflicts of interest affecting the regulated business. These matters fall squarely within Issue 26 (Affiliate Transactions) in Procedural Order No. 2, which is expressly concerned with ensuring that affiliate arrangements do not result in inappropriate costs, cross-subsidization, or weakened oversight affecting the regulated utility. Governance and conflict-management controls are a necessary predicate to determining whether affiliate transactions are prudent and properly priced. In Procedural Order No. 3, the Board "acknowledged the relevance of internal control issues", including a focus on governance matters, as not raised by other intervenors. Motion 2 therefore directly engages an enumerated PO2 issue and raises matters that are material to the Board's determinations.

In the absence of effective governance and conflict-management controls, affiliate interactions may influence resource allocation, decision-making priorities, or cost attribution in a manner that is not transparent, thereby creating a risk of indirect cost impacts to the regulated business.

The Board has a longstanding obligation to ensure that:

- regulated operations are insulated from unregulated business risks,
- ratepayers do not subsidize affiliate activities (directly or indirectly), and
- governance structures do not permit conflicted decision-making affecting regulated costs or priorities.

Laurentis' role as a commercial entity performing work for, or alongside, OPG's regulated business makes governance transparency particularly relevant. The Intervenor seeks information necessary to **test OPG's evidence** that appropriate safeguards exist, consistent with the Affiliate Relationships Code and prior Board decisions.

Why OPG's Refusal Is Unjustified

OPG's position that affiliate governance is categorically outside the scope of this proceeding is inconsistent with:

- the Board's Filing Requirements for OPG,
- the Affiliate Relationships Code, and
- prior Board decisions addressing cross-appointments, affiliate transactions, and governance efficiency.

The narrowed request seeks only **high-level governance and control information**, not commercial strategy or proprietary detail. The Intervenor is not seeking to regulate Laurentis or its commercial activities; rather, the Motion seeks evidence of whether OPG's internal controls and governance safeguards operate effectively in practice where affiliate interactions could affect regulated costs or priorities. The information requested is limited in scope and can be provided through narrative summaries, confirmations, and representative examples. It should impose little burden on OPG, as it largely involves confirming the existence and application of ordinary corporate records and control mechanisms. Ensuring that OPG's governance framework functions as intended when interfacing with affiliate matters is relevant to the Board's ability to set just and reasonable payment amounts.

Confidentiality and Proportionality

The Intervenor does not seek sensitive personal or commercial information. OPG may anonymize individual identities, redact sensitive details, and may file responsive materials in confidence if necessary, all consistent with the Practice Direction on Confidential Filings. The Motion seeks primarily summaries or confirmations, rather than extensive documentation, ensuring that the response can be provided efficiently and without undue burden.

Requested Order

Where OPG states that no responsive records exist, OPG shall also describe, with sufficient specificity, the processes, systems, reporting structures, and responsible roles through which the underlying activity, risk, or control function was monitored, managed, and overseen during the relevant period, such that the Board can assess whether the function was effectively performed in practice.

The Intervenor respectfully requests that the Board order OPG to produce the information described above within **14 days**.

If any requested record does not exist, OPG shall explicitly confirm that fact and describe what alternative records or processes are used in its place. Where the requested information is not available in the precise form requested, OPG shall provide the information in the best available form, including representative samples where appropriate.

Motion 3

Production of Targeted Code of Business Conduct Compliance and Affiliate-Related Hiring Information

(IR F3Pinto004)

Relief Sought

The Intervenor respectfully requests that the Ontario Energy Board order Ontario Power Generation Inc. ("OPG") to provide a full and adequate response to Interrogatory **F3Pinto004**, as narrowed and clarified below.

Laurentis is proposed as a **representative case study**. There is nothing uniquely problematic about Laurentis as compared to other OPG affiliates; rather, it provides a concrete and material example through which the Board can assess whether OPG's affiliate governance framework operates effectively in practice.

The Intervenor seeks summary-level records and explanations sufficient to determine whether OPG appropriately applied its Code of Business Conduct ("CoBC"), conflict-of-interest controls, and affiliate ring-fencing obligations in a non-routine senior staffing scenario involving OPG and its unregulated affiliate Laurentis Energy Partners ("Laurentis"). The focus is on OPG's internal processes and safeguards, not on adjudicating any individual's conduct.

Scope of Requested Production (Narrowed)

1. Time Period

- **January 1, 2023 through December 31, 2025**

2. Entities in Scope

- Laurentis Energy Partners (the unregulated affiliate in the scenario) and the relevant OPG corporate management and oversight functions involved.

3. Triggering Scenario (Defined)

One or more instances during 2023–2025 where OPG became aware of:

- a senior, advisory, leadership or otherwise unrepresented role associated with Laurentis, including Laurentis subsidiary Canadian Nuclear Partners SA ("CNPSA"), was created or filled outside OPG's ordinary budgeting, approval, or competitive recruitment or contracting processes, and
- the appointment or engagement involved the direction, approval, or participation of a senior OPG executive with responsibilities for OPG's rate-regulated operations.

If no such scenarios occurred in 2023–2025, OPG shall so state explicitly, and describe the controls, monitoring mechanisms, and financial or procurement systems used to identify and prevent or detect the use of affiliate-provided contractor services in the regulated business.

Background

Interrogatory F3 Pinto 004 asked how OPG applied its CoBC and related internal controls in a non-routine hiring or engagement scenario that spanned OPG’s regulated business and an unregulated affiliate. OPG refused to answer, asserting that the inquiry was speculative or outside the scope of a payment amounts proceeding.

The Intervenor has accordingly narrowed the request to focus strictly on governance processes and compliance measures, not personal HR details. This scenario is used as a representative case study to illuminate OPG’s internal controls in practice, which is within the Board’s purview to review as part of ensuring prudent management of the regulated business.

Specific Records Requested

A. Applicable CoBC and Related Policies (Summary)

Provide the relevant portions of OPG’s Code of Business Conduct (“CoBC”) and any corporate policies in effect during 2023–2025 that governed:

- conflicts of interest and ethical obligations in staffing decisions;
- interactions between OPG’s regulated business and its affiliates in human resources matters (e.g., secondments, contractors, shared personnel); and
- processes for approving executive hires or appointments outside normal procedures.

If internal, they may be summarized or filed in confidence with sensitive details redacted. If no such policies or provisions existed during 2023–2025, OPG shall confirm that and explain what alternative guidelines or practices were in place, and identify the responsible governance or HR function.

B. Application of CoBC and Hiring Controls in the Scenario

For the triggering scenario defined above (if it occurred), describe how OPG’s internal controls and approval processes were applied, including:

- whether the role was filled through a standard competitive posting and, if not, what management approval or executive authorization allowed an exception;
- whether any conflict-of-interest disclosure was required or made under the CoBC and whether OPG’s Ethics & Compliance function reviewed and cleared the arrangement;
- whether the arrangement was evaluated for affiliate ring-fencing and conflict-of-interest compliance; and
- what mitigation measures or safeguards, if any, were implemented (such as recusal, independent review of terms, or segregation of duties).

This may be provided as a concise narrative referencing any available internal documentation (e.g., memorandum, approval form, or email). If no such records or approvals were generated, OPG shall explicitly confirm that and explain how the situation proceeded without triggering standard controls. OPG shall identify the accountable corporate roles (by title or function).

C. Parent-Level Oversight and Internal Review

State whether the scenario (if it occurred) was subject to any parent-level oversight or review, including whether OPG's senior management, Board (or committees), or any internal oversight function (e.g., Internal Audit, Enterprise Risk Management, or an Ethics/Compliance office) reviewed the scenario or its outcomes. If such oversight occurred, provide a brief summary of key conclusions or recommendations. If no parent-level or independent oversight took place, OPG shall confirm that explicitly.

D. Post-Engagement and Continuing Obligations

Describe any post-engagement restrictions or ongoing conflict-of-interest controls that applied to the individuals and entities involved in the scenario (e.g., cooling-off periods, non-solicitation, ongoing recusal). Confirm whether any such measures were implemented to ensure OPG's regulated operations remained protected from potential biases or conflicts arising from the scenario. If no special continuing obligations were applied, OPG shall confirm that explicitly.

Relevance and Materiality

Motion 3 concerns the application of OPG's Code of Business Conduct and related governance and compliance controls to the matters at issue in this proceeding. These issues logically and directly relate to the PO2 issues concerning internal controls, governance, and the prudence of management practices underpinning OPG's expenditure decisions. Adherence to the Code (and the effectiveness of mechanisms to enforce it) affects the reliability of management decision-making, the mitigation of operational and compliance risks, and the integrity of costs proposed for recovery. In Procedural Order No. 3, the Board "acknowledged the relevance of internal control issues", including a focus on governance matters, as not raised by other intervenors. Motion 3 is therefore clearly relevant and material to the PO2 issues the Board must decide.

The Board must be satisfied that OPG's high-level decision-making processes (including adherence to its CoBC and conflict-of-interest policies) are effective in practice, so that ratepayers are not exposed to unwarranted costs or risks from affiliate interactions or preferential arrangements. A non-routine staffing scenario involving both OPG and Laurentis serves as an illustrative test of those safeguards. This information will help the Board determine whether OPG's internal controls and oversight are functioning as intended in areas that could impact the regulated business.

Why OPG's Refusal Is Unjustified

OPG's refusal to answer IR F3 Pinto 004 mischaracterized the inquiry as "speculative" and beyond the scope of a payment amounts proceeding. In fact, as narrowed, the Motion squarely concerns OPG's

internal controls and governance in situations bridging regulated and unregulated activities, an area that falls within the Board's mandate to review under the issues of internal controls, risk management, and affiliate cost allocation.

The Intervenor is not seeking to delve into personal HR matters or to have the Board adjudicate employment disputes. Rather, the Motion seeks evidence of whether OPG followed its own established protocols and obligations (via the CoBC, the Affiliate Relationships Code, and related policies) in a context that could otherwise give rise to favoring affiliate interests or incurring costs outside of normal processes.

This is a reasonable and relevant line of inquiry because such actions, if uncontrolled, can undermine the prudence of OPG's decisions or result in costs or risks being improperly imposed on the regulated business. The information requested is limited in scope and can be provided through narrative summaries and confirmations. It should impose little burden on OPG, as it largely involves confirming the existence and application of known policies and describing any pertinent oversight steps taken. Ensuring that OPG's internal governance works as intended when interfacing with affiliate matters is crucial to the Board's ability to set just and reasonable rates, and thus the request is squarely within scope.

Confidentiality and Proportionality

The Intervenor is mindful of confidentiality and has tailored this Motion to avoid any personal or sensitive information unrelated to regulatory concerns. No individual names or personal performance details are sought. OPG may anonymize individuals by title or role, redact specific personal identifiers or competitively sensitive data, and may file responsive materials in confidence if necessary, all in accordance with the OEB's Practice Direction on Confidential Filings. Furthermore, the Motion seeks primarily summaries or confirmations, rather than extensive documentation, ensuring that the response can be provided efficiently and without undue burden. The requested relief is proportionate to the importance of assuring the Board that OPG's commitments to ethical conduct and independent management of its regulated business have been upheld in practice.

Requested Order

The Intervenor respectfully requests that the Board order OPG to produce, within **14 days**, the information described above, subject to the narrowed scope and confidentiality accommodations.

- Identify and produce or summarize the relevant CoBC and policy provisions governing conflicts of interest, affiliate interactions, and non-standard hiring practices in effect during 2023–2025 (or confirm if such provisions were not in place).
- Explain how OPG's internal controls were applied in the identified scenario, including approvals, conflict-of-interest checks, ring-fencing review, and safeguards, referencing any available internal documentation.

- Describe any parent-level or independent oversight of the scenario (or confirm if none occurred).
- Confirm any continuing conflict-of-interest controls or restrictions relating to the scenario (or confirm if none were necessary).

If any of the requested records or reviews do not exist, OPG shall explicitly confirm that fact and describe what alternative oversight or controls were in place to fulfill those functions. If particular information is not available in the precise form requested, OPG shall provide it in the best available format (e.g., narrative summary or representative example) that addresses the request.

Motion 4

Production of Targeted Affiliate Contractor Engagement and Cost Allocation Information

(IR F3Pinto005)

Relief Sought

The Intervenor respectfully requests that the Ontario Energy Board order Ontario Power Generation Inc. ("OPG") to provide a **full and adequate response** to Interrogatory **F3Pinto005**, as narrowed and clarified below.

The Intervenor seeks **summary-level records and explanations** sufficient to allow the Board to assess whether OPG's regulated operations engaged contractor resources through its unregulated affiliate **Laurentis Energy Partners ("Laurentis")**, and if so, whether such arrangements were governed, priced, and recorded in a manner consistent with the **Affiliate Relationships Code ("ARC")**, prudent procurement practices, and the protection of ratepayers.

Laurentis is used as a **representative case study**. The Intervenor does not assert that Laurentis is unique among OPG affiliates; rather, it provides a concrete example through which the Board can evaluate whether OPG's affiliate contracting and cost-allocation controls operate effectively in practice.

The absence of such records, if confirmed, may be relevant to the Board's assessment of the adequacy of OPG's internal control framework and the prudence of its practices.

Scope of Requested Production (Narrowed)

1. Time Period

- **January 1, 2023 through December 31, 2025**

2. Affiliate in Scope

- **Laurentis Energy Partners**, including any instances where contractor personnel or services engaged by Laurentis were used to perform work for OPG's regulated operations.

3. Subject Matter (Defined)

Only information relating to:

- engagement of contractor personnel through Laurentis for work benefiting OPG's regulated business,
- pricing and cost-allocation of such services,
- oversight, approvals, and compliance with the ARC and internal procurement controls.

Background

Interrogatory **F3Pinto005** sought information regarding whether OPG's regulated operations utilized contractor services engaged through an unregulated affiliate, and if so, how OPG ensured compliance with arm's-length pricing, proper cost allocation, and conflict-of-interest controls. These requests relate directly to Issue 26 and the Board's mandate to prevent cross-subsidization.

OPG declined to respond, asserting that the interrogatory pertained to unregulated affiliate practices and was therefore outside the scope of a payment amounts proceeding.

Specific Records Requested

A. Applicable Policies and Controls (Limited)

OPG shall provide the policies or procedures in effect during 2023–2025 that govern:

- Engagement of services or contractor personnel through affiliates;
- Pricing and cost-allocation of affiliate-provided services to regulated operations; and
- Compliance with the ARC in such circumstances.

If no affiliate-specific policy exists, OPG shall describe how general procurement, cost-allocation, and ARC compliance policies are applied to affiliate-provided contractor services. Publicly available documents may be referenced by link. Confidential materials may be filed in confidence or summarized.

B. Identification of Affiliate-Provided Contractor Services

Confirm whether any instance meeting the defined triggering scenario occurred during 2023–2025. If no such instance occurred, confirm that explicitly and describe the controls, monitoring mechanisms, and financial or procurement systems used to identify and prevent or detect the use of affiliate-provided contractor services in the regulated business.

OPG shall state whether, during 2023–2025, contractor personnel or services engaged by **Laurentis** were used to perform work for OPG's regulated operations.

If yes, OPG shall provide a **high-level description** for each instance, including:

- the nature of the work performed,
- whether the contractor was engaged directly by Laurentis or through a third party, and
- how the services were charged to OPG (e.g., at cost, cost-plus, or market-based).

If such records do not exist, OPG shall explicitly confirm that fact and explain why such records were not maintained, including what alternative processes were relied upon.

C. Pricing, Cost Allocation, and Oversight (Representative)

For any instance identified above, OPG shall provide:

- A summary of how pricing for the contractor services was determined, sufficient to demonstrate compliance whether services were priced at cost or cost-plus in accordance with the ARC's arm's-length or at-cost requirements;
- Confirmation of how the costs were recorded in OPG's accounts (e.g., as an affiliate service transaction rather than internal labour or non-affiliate procurement); and
- A description of any approvals, reviews, or oversight applied to the arrangement (e.g., procurement review, finance approval, conflict-of-interest checks).

OPG's response shall be sufficient to demonstrate whether the pricing methodology applied would reasonably prevent the inclusion of affiliate margin, overhead, or other costs not permitted under the Affiliate Relationships Code.

This information may be provided in narrative form or by reference to existing summary documentation. Detailed contracts or rate sheets are not required unless necessary to explain the pricing methodology.

D. Alternatives Considered (High-Level)

OPG shall state whether, for any such instance, alternatives were considered, such as:

- direct contracting by OPG, or
- use of internal OPG resources.

If so, OPG shall briefly describe why the affiliate-provided contractor arrangement was selected. If not, OPG shall confirm that no alternatives were documented.

Relevance and Materiality

Motion 4 examines OPG's engagement of an affiliate contractor and the allocation of costs associated with that arrangement, including the role of Laurentis Energy Partners. These matters fall squarely within Issue 26 (Affiliate Transactions) in Procedural Order No. 2 and engage the Board's core responsibility to ensure that costs allocated to the regulated business are prudent, properly assigned, and free from affiliate preference or cross-subsidization. Cost allocation and oversight of affiliate contracting are central to determining whether ratepayers are being charged only just and reasonable amounts. In Procedural Order No. 3, the Board "acknowledged the relevance of internal control issues", including a focus on governance matters, as not raised by other intervenors. Motion 4 therefore addresses issues that are both expressly enumerated in PO2 and materially relevant to the Board's review.

The absence of transparent pricing and cost-allocation controls in affiliate contractor arrangements creates a direct risk that costs borne by the regulated business may not reflect arm's-length or at-cost standards required under the Affiliate Relationships Code.

The ARC exists to ensure that regulated utilities do not incur inflated or non-arm's-length costs through affiliate arrangements. Where contractor services are provided to the regulated business through an affiliate, the Board must be satisfied that:

- pricing reflects market or at-cost standards,
- no affiliate margin or overhead is inappropriately borne by ratepayers, and
- such costs are transparently recorded and reviewed.

Understanding whether and how such arrangements occurred during 2023–2025 assists the Board in assessing the prudence of OPG's historical costs and the reasonableness of its forecast costs for the 2027–2031 period.

Why OPG's Refusal Is Unjustified

OPG's position that affiliate contractor arrangements are categorically outside the scope of this proceeding is inconsistent with the Board's longstanding oversight of affiliate transactions affecting regulated costs.

The narrowed request does not seek to regulate Laurentis or its commercial activities. It seeks only to understand whether **OPG's regulated operations** incurred costs through affiliate-provided contractor services and whether those costs were managed in accordance with the ARC and prudent utility practice. The information requested is limited, targeted, and capable of being provided through summaries or narrative explanations. Much of it should be readily available within OPG's procurement, finance, or affiliate-transaction records. Ensuring that OPG's internal controls work as intended when interfacing with affiliate contracting and cost-allocation is crucial to the Board's ability to set just and reasonable payment amounts.

Confidentiality and Proportionality

The Intervenor does not seek commercially sensitive contractor details or individual names. OPG may anonymize contractors, redact sensitive commercial terms, and may file responsive materials in confidence if necessary, all consistent with the Practice Direction on Confidential Filings. The Motion seeks primarily summaries or confirmations, rather than extensive documentation, ensuring that the response can be provided efficiently and without undue burden.

Requested Order

Where OPG states that no responsive records exist, OPG shall also describe, with sufficient specificity, the processes, systems, reporting structures, and responsible roles through which the underlying

activity, risk, or control function was monitored, managed, and overseen during the relevant period, such that the Board can assess whether the function was effectively performed in practice.

The Intervenor respectfully requests that the Board order OPG to produce the information described above within **14 days**.

If any requested record does not exist, OPG shall explicitly confirm that fact and describe what alternative controls or processes were relied upon. Where the requested information is not available in the precise form requested, OPG shall provide the information in the best available form, including representative samples where appropriate.

Motion 5

Production of Targeted Affiliate Management Oversight and Internal Audit Information

(IRs F3Pinto005 and F3Pinto006)

Relief Sought

The Intervenor respectfully requests that the Ontario Energy Board order Ontario Power Generation Inc. ("OPG") to provide a full and adequate response to Interrogatories F3-Pinto-005 and F3-Pinto-006, as consolidated, narrowed, and clarified below.

The Intervenor seeks summary-level information and records sufficient to allow the Board to assess whether OPG's parent-level governance and oversight of its unregulated affiliate Laurentis Energy Partners ("Laurentis") has adequately protected the regulated business from any management-related risks, and whether OPG's internal oversight functions (Internal Audit, Enterprise Risk Management, and Board governance committees) have examined and addressed such affiliate governance and human-resource issues (and related concerns raised in IRs F3-Pinto-001 through -006) during the relevant period. The focus is on processes and safeguards, not on adjudicating individual employment matters.

Scope of Requested Production (Narrowed)

1. Time Period

- **January 1, 2023 through December 31, 2025**

2. Entities in Scope

- Laurentis Energy Partners (the affiliate) and relevant OPG oversight functions (Internal Audit, Enterprise Risk Management, and OPG Board committees).

3. Subject Matter (Defined)

Only information relating to parent-level monitoring and control of Laurentis's senior management engagements and human-resources practices, and to OPG's internal audit, risk, or governance reviews of the same or closely related issues (including the subject areas raised in IRs F3Pinto001 through F3Pinto006, insofar as they were considered by OPG's internal oversight functions).

Background

Interrogatory F3-Pinto-005 sought information about how OPG, as the parent company, exercised oversight over senior management appointments, engagements, and turnover at Laurentis, and whether any such affiliate management issues could impact OPG's regulated operations or costs.

Interrogatory F3-Pinto-006 (and its supplemental details) asked whether OPG's Internal Audit, risk management, or Board committees reviewed the kinds of issues raised in IRs F3-Pinto-001 through -005 – e.g., facilities maintenance backlog management, affiliate governance and conflict-of-interest controls, Code of Conduct compliance in management decisions, affiliate transactions, and affiliate personnel practices – and if so, what findings or actions resulted.

OPG declined to provide substantive responses, asserting that these inquiries related to unregulated affiliate matters and were outside the scope of setting payment amounts. The Intervenor has accordingly consolidated and narrowed these requests to focus strictly on governance processes and oversight outputs. Such information is well within the Board's mandate when considering OPG's application, because deficiencies in affiliate governance or gaps in OPG's internal oversight could signal risks or costs that ultimately affect ratepayers.

Specific Records Requested

A. Management Engagement and Turnover at Laurentis (Summary)

- The number of individuals in non-represented, management banded roles (encompassing managers, HR and administrative positions, i.e., roles generally corresponding to OPG's management bands F through L) at Laurentis in each year, categorized by engagement type (e.g., OPG employees seconded to Laurentis, direct Laurentis-employed managers, or contract/consultant engagements).
- A high-level summary of significant Laurentis leadership changes, to the extent any resulted in costs, risks, or liabilities affecting OPG's regulated business in 2023, 2024, and 2025 (for example, changes in CEO or Vice President positions), indicating whether each departure was planned (e.g., due to retirement or reorganization) or unplanned (e.g., resignations or terminations for cause). Individual names need not be provided; identification by position or role is sufficient.

If formal documentation of these data does not exist, OPG shall explicitly confirm that and describe what alternative records or processes are used to track management composition and changes at Laurentis. OPG shall identify the OPG role(s) or governance body responsible for monitoring Laurentis's management appointments and turnover.

B. Parent-Level Oversight Actions and Governance Response

- Whether OPG's senior executives or Board (e.g., Audit/Risk Committee or People and Culture Committee) were informed of material Laurentis management issues (such as exception forced churn rates, rapid turnovers or unusual "contractors" as management arrangements) and, if so, how such information was communicated (e.g., formal reports or presentations).
- Whether any significant Laurentis management issues were captured in OPG's enterprise risk management processes (e.g., corporate risk register or enterprise risk meetings) and what mitigation or monitoring actions were initiated.

If no such parent-level oversight actions or risk escalations occurred with respect to Laurentis' management during 2023–2025, OPG shall confirm that explicitly.

C. Cost Allocation and Liability Treatment

OPG shall also indicate whether its corporate People & Culture (HR) policies (e.g., those governing severance, executive benefits, or disciplinary actions) and its Code of Business Conduct (including conflict-of-interest provisions) applied to individuals serving in Laurentis management roles (including OPG employees on secondment), or if Laurentis maintained separate policies.

OPG shall confirm whether any CoBC declarations or exceptions were required or made in connection with the management arrangements or decisions described above (for example, overlapping roles or hiring decisions involving OPG personnel), and if none were made, OPG shall so state.

D. Internal Audit and Enterprise Risk Oversight Outputs

OPG shall state whether, during 2023–2025, any of the following parent-level oversight functions undertook reviews, assessments, or monitoring activities that examined, in whole or in part, the subject areas raised in Interrogatories F3Pinto001 through F3Pinto006, including but not limited to:

- facilities maintenance backlog management and prolonged impairment escalation practices (including corporate real estate facilities supporting regulated operations);
- affiliate governance, conflict-of-interest controls, and compliance with the Affiliate Relationships Code;
- application of the Code of Business Conduct in affiliate-related management or staffing decisions;
- affiliate transactions, shared services, or cost allocation practices involving regulated operations; and
- affiliate management stability, senior leadership turnover, or related human-resource risks.

For each such review or assessment (if any), OPG shall, at a high level, identify:

- the reviewing body or function (e.g., Internal Audit, Enterprise Risk Management, Board committee);
- the timing and general scope of the review; and
- whether the review resulted in findings, recommendations, or required management actions relevant to the foregoing subject areas.

OPG may satisfy this request by providing executive summaries, key findings summaries, or high-level descriptions of relevant oversight outputs. Detailed working papers, personal information, or underlying source documents are not required.

If no Internal Audit reviews, enterprise risk assessments, or Board-level reviews examined the subject areas described above during 2023–2025, OPG shall explicitly confirm that fact.

E. Lessons Learned and Governance Improvements

OPG shall state whether, as a result of any affiliate-related governance, management, or risk issues identified during 2023–2025—including those relating to senior management turnover, governance structure, conflict-of-interest controls, or internal oversight—any management or Board-level corrective actions, lessons learned, or governance improvements were identified or implemented to strengthen parent-level oversight or to protect OPG’s regulated operations.

This may include, at a high level:

- enhancements to governance frameworks, oversight processes, or escalation thresholds;
- changes to the application or monitoring of the Code of Business Conduct or affiliate governance controls;
- adjustments to enterprise risk identification, tracking, or mitigation practices; or
- clarifications of roles, accountabilities, or reporting arrangements between OPG and its affiliates.

OPG may respond through a concise narrative summary or confirmation. If no lessons learned, corrective actions, or governance improvements were identified or implemented in response to affiliate-related oversight issues during 2023–2025, OPG shall explicitly confirm that fact.

Relevance and Materiality

Motion 5 addresses OPG’s parent-company oversight functions, including internal audit and enterprise risk management, as they relate to the matters under review in this proceeding. These matters directly engage the PO2 issues relating to governance, internal controls, and the prudence of management oversight supporting OPG’s cost and risk decisions. Effective parent-level oversight can materially influence expenditure discipline, the identification and mitigation of operational risks, and the prevention of cost inefficiencies that may otherwise be borne by ratepayers. In Procedural Order No. 3, the Board “acknowledged the relevance of internal control issues”, including a focus on governance matters, as not raised by other intervenors.

This underscores the relevance and materiality of Motion 5 to the PO2 issues before the Board.

Why OPG’s Refusal Is Unjustified

OPG’s refusal to provide this information on the basis that it pertains to unregulated operations or is onerous is not justified. The Intervenor has narrowed the request to focus on information that is either already in OPG’s possession (internal audits, risk reports, summaries) or straightforward for OPG to compile (management turnover summaries, cost confirmation).

The Board is not being asked to intrude into the detailed affairs of the affiliate for their own sake, but rather to examine OPG's handling of affiliate-related risks and governance as part of its mandate to ensure just and reasonable payment amounts. Effective parent oversight and internal risk management are critical to maintaining the financial and operational health of the regulated business. The Board has previously recognized that weak internal controls or governance can lead to excessive or imprudent costs for ratepayers.

The requested information will either confirm that OPG's oversight of affiliate matters is robust (which supports OPG's case for approval of its application), or reveal gaps that the Board may need to address (for instance, through conditions or heightened scrutiny). In either case, the information is probative and material. Moreover, the request is limited to high-level summaries and confirmations; it does not seek voluminous raw data or trivial details, only the results of OPG's oversight processes. OPG's broad refusal leaves the Board with an incomplete picture of OPG's governance environment, and granting this Motion will fill that gap with targeted evidence.

Confidentiality and Proportionality

The Intervenor is mindful of OPG's confidentiality and burden concerns. The Motion has been tailored to avoid personal HR data and to focus on existing oversight documents rather than demanding new analysis. Where specific records (such as internal audit reports or risk assessments) are responsive, OPG may provide executive summaries or redacted excerpts rather than full reports, and may request confidential treatment under the OEB's Practice Direction on Confidential Filings as needed. By seeking confirmation of non-existence of records where applicable, the Motion also allows OPG to satisfy certain items with simple statements if no action was taken or no document produced. This approach ensures a balanced, proportional disclosure that illuminates OPG's governance practices without imposing undue burden or revealing immaterial details.

Requested Order

The Intervenor respectfully requests that the Board order OPG to produce, within **21 days**, the materials and information described above. In particular, OPG should be required to:

- Provide a summary of Laurentis's senior management composition and any major leadership changes during 2023–2025 (and the types of engagements for those roles), as described in section A.
- Provide representative records or descriptions of parent-level oversight actions or risk escalations in response to significant Laurentis management issues, as outlined in section B (or explicitly confirm if none occurred).
- Confirm that no costs or liabilities related to Laurentis management personnel or their turnover were allocated to OPG's regulated operations, or identify any such costs and their handling, as described in section C.

- Identify any internal audits or formal enterprise-level reviews conducted during 2023–2025 that examined asset maintenance, affiliate governance, Code of Conduct compliance, affiliate transactions, or affiliate management issues, and provide a summary of the relevant findings.
- Explicitly confirm if no such internal audits or enterprise-level reviews were performed on those subjects during the period.
- Provide a summary of any management or Board-level corrective actions or governance improvements implemented in response to affiliate management issues or internal oversight findings, as requested in section E above.

If any of the requested records or reviews do not exist, OPG shall clearly state so and describe what alternative oversight mechanisms (if any) were in place to address the underlying concern. Where exact documents are not available in the form requested, OPG may satisfy the request by providing the best available alternative information (for example, narrative summaries of oversight activities). Sensitive personal or commercial information may be redacted or provided in a confidential filing consistent with the Board's Practice Direction on Confidential Filings