



**BY EMAIL and RESS**

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May 21, 2026  
Our File: EB20250297

**Attn: Ritchie Murray, Registrar**

Dear Mr. Murray:

**Re: EB-2025-0297 – OPG 2027-2031 – Technical Conference**

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No.2, below are SEC’s time estimates and areas of focus for the Technical Conference. SEC is still reviewing the interrogatory responses, including responses to the motions that were just filed yesterday, and as a result these estimates should therefore be considered preliminary. SEC will provide an updated time estimate early next week before the start of the Technical Conference.

<b>Panel</b>	<b>Areas of Focus</b>	<b>Time Estimate</b>
1	Hydroelectric capital and OM&A, HIM	75 minutes
2	DRP, PRP, nuclear operations capital, nuclear OM&A, nuclear benchmarking, nuclear staffing	90 minutes
3	DNNP	45 minutes
4	Business planning, rate frameworks, hydroelectric productivity and benchmarking (LEI evidence), cost of capital, compensation costs, corporate costs, cost allocation, depreciation, taxes, DVAs	180 minutes

SEC understands based on the witness list that has been circulated, and follow-up discussions with OPG, that the company does not intend to present any of its expert witnesses at the Technical Conference. SEC has expressed its concern to OPG. Through coordination with the Consumers Council of Canada (“CCC”), there are important follow-up questions for other experts that they intend to pursue, that we also will be reliant on. Additionally, SEC has questions for London Economics Inc. (“LEI”) as well as potentially for Willis Towers Watson.<sup>1</sup>

Notwithstanding what may have happened in previous OPG applications, SEC agrees with the comments made in the letter filed by CCC, that the OEB should require the company to present these

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<sup>1</sup> There remains an outstanding interrogatory response (F4-SEC-198) that OPG has informed SEC will be filed tomorrow. The interrogatory response involves calculations undertaken by WTW, and so we may have follow-up questions for them. Considering that it has taken the company four additional weeks to file the response, we can presume it is a very complex set of calculations that may require follow-up.



important witnesses on material issues at the Technical Conference. In SEC's view, simply asking OPG questions meant for the experts, which would then require a response by undertaking, is no different than a second round of interrogatories. We believe that this diminishes the value of the Technical Conference, which is meant to allow discussion and immediate follow-up so that parties can properly understand often complex information.

Yours very truly,  
**Shepherd Rubenstein P.C.**

Mark Rubenstein

cc: Brian McKay, SEC (by email)  
Applicant and intervenors (by emails)