



May 21, 2026

**VIA RESS**

Ontario Energy Board  
P.O. Box 2319,  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attention: Acting Registrar

Dear Mr. Murray,

**Re: Ontario Power Generation Inc. and DNNP LP (together, the “Applicants”)  
2027-2031 Payment Amounts  
Board File No: EB-2025-0297**

We are counsel to Minogi Corp. (“**Minogi**”) in above-noted proceeding. Pursuant to Procedural Order No. 2, and in the interest of procedural efficiency, Minogi is prepared to forego seeking clarification of the Applicants’ interrogatory responses at the Technical Conference. We understand that the Applicants have confirmed they will respond to Minogi’s clarification questions by way of undertaking, which are set out in the appendix to this letter. Minogi also believes that this approach is consistent with the Board’s broader direction to increase cost and regulatory efficiencies.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer".

DT Vollmer

- c. All other parties  
Don Richardson, Minogi

Interrogatory	Applicants' Response	Question
A1-MC-001	OPG will comply with the Buy Ontario Procurement Directive (the " <b>Directive</b> "). This includes reviewing and updating internal procurement processes where applicable and monitoring for additional guidance and updates issued by the Province of Ontario.	<p><b>1.</b> Please describe how OPG's existing procurement processes address the Directive for the 2027-2031 period, including:</p> <ul style="list-style-type: none"> <li>(a) the procurement planning steps OPG understands to be required by the Directive;</li> <li>(b) any existing evaluation criteria or procurement considerations that OPG relies on to address Ontario-based, regional, local, or proximity-based supply chain outcomes;</li> <li>(c) any internal guidance, templates, procedures, or communications used by OPG to implement or operationalize the Directive;</li> <li>(d) any internal group, role, or business unit responsible for monitoring OPG's compliance with the Directive; and</li> <li>(e) the basis for OPG's statement that the requirements issued to date do not result in incremental or material costs beyond those already reflected in the 2025-2031 Business Plan.</li> </ul>
F2-MC-008	Based on the <i>Buy Ontario Act</i> and the requirements issued to date, related administrative costs are embedded within OPG's existing procurement process and does not result in incremental or material costs beyond those already reflected in OPG's 2025-2031 Business Plan. The Applicants will continue to monitor additional requirements issued by the Province of Ontario and assess any impacts at that time.	
A1-MC-001; F2-MC-008	Same as above.	<p><b>2.</b> Please identify the existing metrics, reports, scorecards, or other mechanisms OPG uses or intends to use to monitor procurement outcomes relevant to the Directive, including any information relating to:</p> <ul style="list-style-type: none"> <li>(a) spend or contract awards with Ontario-based suppliers;</li> <li>(b) local or regional supplier participation;</li> <li>(c) participation by Indigenous, community-owned, or rightsholder-affiliated businesses;</li> </ul>
F3-MC-009	OPG is not proposing separate procurement related reporting to the OEB. OPG already maintains multiple internal and external mechanisms to document, track, and report on procurement-related activities and outcomes, including corporate procurement records	

	<p>maintained in accordance with internal governance and financial control requirements.</p> <p>OPG maintains procurement-related record-keeping, reporting, and scorecard practices. OPG's procurement process includes documented evaluation criteria, weightings, and an evaluation methodology used to assess and score supplier submissions, and OPG retains procurement records to support contract award and contract administration.</p>	<p>(d) facility-level or project-level procurement outcomes for Pickering, Darlington, DNNP, and WWMF; and</p> <p>(e) any reporting to the Province, OPG management, or OPG's Board.</p> <p>Please provide any available 2023-present results for these metrics, or explain whether and why such results are not tracked in OPG's existing systems.</p>
F3-MC-011	<p>Progress is tracked annually using contract award and spend data, with specific metrics to identify participation by community-owned and rightsholder-affiliated suppliers to support delivery and accountability. OPG has embedded Indigenous economic participation into its sourcing and supplier management processes. This includes hosting procurement information sessions for Indigenous businesses and OPG staff, requiring Indigenous engagement plans as part of RFP submissions, evaluating supplier performance against Indigenous engagement commitments, and delivering a structured mentorship program that pairs Indigenous business leaders with senior OPG leaders.</p>	<p><b>3.</b> Please describe the data fields used by OPG to track this contract award and spend data, including whether OPG records:</p> <p>(a) supplier classification categories;</p> <p>(b) whether the supplier is Indigenous-owned, First Nation-owned, community-owned, or rightsholder-affiliated;</p> <p>(c) whether the supplier is a prime contractor or subcontractor;</p> <p>(d) contract value, actual spend, and year of award/spend;</p> <p>(e) business unit, project, facility, or procurement category;</p> <p>(f) supplier location; and</p> <p>(g) any treaty-area, community, or rightsholder affiliation.</p>
L-F3-MC-011	<p>Same as above.</p>	<p><b>4.</b> Please provide OPG's definitions, and how it verifies qualification including whether OPG verifies affiliation with Williams Treaties First Nations or Treaty 45 ½ First Nations, of the following terms (or such other similar terms as used by OPG) in its procurement tracking, reporting, RFP</p>
L-F3-MC-012	<p>OPG does not categorize or track procurement spending as being specifically suitable for local or First Nation rightsholder sourcing. Refer to Ex. L-F3-MC-009 and Ex. L-F3-MC-011 for</p>	

	<p>information on OPG's procurement reporting and Indigenous economic inclusion. Further, Ex. L-D3-MC-005 describes OPG's procurement evaluation process and assessment of suppliers.</p>	<p>evaluation, supplier management, or Indigenous economic inclusion processes:</p> <ul style="list-style-type: none"> <li>(a) "Indigenous supplier";</li> <li>(b) "First Nation supplier";</li> <li>(c) "community-owned supplier";</li> <li>(d) "rightsholder-affiliated supplier";</li> <li>(e) "local supplier"; and</li> <li>(f) "diverse supplier".</li> </ul>
<p>F3-MC-009; F3-MC-011; F3-MC-012</p>	<p>Same as above.</p>	<p><b>5.</b> Please confirm whether OPG's existing procurement tracking, reporting, or record-keeping systems can disaggregate procurement award and spend data by:</p> <ul style="list-style-type: none"> <li>(a) facility, including Pickering, Darlington, and WWMF;</li> <li>(b) project, including DNNP, Pickering refurbishment, and waste management-related work;</li> <li>(c) treaty area, including Williams Treaties and Treaty 45 ½;</li> <li>(d) rightsholder affiliation, including Williams Treaties First Nations and Treaty 45 ½ First Nations; and</li> <li>(e) supplier proximity to the relevant facility or project site.</li> </ul> <p>If OPG's existing systems cannot disaggregate data in one or more of these ways, please explain the reason, including any technical, policy, governance, or data-quality limitations.</p>

<p>F3-MC-009; F3-MC-011; F3-MC-012</p>	<p>Same as above.</p>	<p><b>6.</b> Please provide annual 2020-present contract award value and actual spend, to the extent available in OPG’s existing records, for:</p> <ul style="list-style-type: none"> <li>(a) Indigenous suppliers;</li> <li>(b) First Nation community-owned suppliers;</li> <li>(c) rightsholder-affiliated suppliers;</li> <li>(d) suppliers affiliated with Williams Treaties First Nations;</li> <li>(e) suppliers affiliated with Treaty 45 ½ First Nations; and</li> <li>(f) Indigenous or rightsholder-affiliated subcontractors.</li> </ul> <p>If OPG does not track one or more of these categories, please confirm that and explain how the available tracked categories differ from the categories listed above.</p>
<p>F3-MC-009; F3-MC-011;</p>	<p>Same as above.</p>	<p><b>7.</b> Please describe whether and how OPG tracks or retains information regarding the following and provide any existing reports, templates, or metrics used for this purpose, or identify where in OPG’s procurement process these matters are recorded:</p>
<p>D3-MC-006</p>	<p>Please see Ex. F3-3-1, which describes OPG’s procurement process that underpins expenditures made across the organization, including Section 7 of the exhibit entitled “Social License and Procurement”. The procurement process that is and will be in effect is the relevant process to be considered in this Application.</p>	<ul style="list-style-type: none"> <li>(a) Indigenous engagement plans submitted as part of RFP responses;</li> <li>(b) subcontracting commitments made by prime contractors to Indigenous, First Nation, community-owned, or rightsholder-affiliated businesses;</li> <li>(c) actual subcontracting performance against those commitments;</li> <li>(d) supplier performance evaluation against Indigenous engagement commitments; and</li> <li>(e) any consequences, incentives, or corrective actions where actual performance differs from commitments.</li> </ul>

D3-MC-005	OPG has not directly undertaken such analyses; however, proximity-based factors are one of several considerations within the established procurement evaluation criteria. OPG's procurement evaluation process considers all viable market opportunities and assesses suppliers based on overall value, including their ability to meet technical, commercial, and business requirements. This approach is applied consistently across procurements.	<p><b>8.</b> Please describe how OPG's existing procurement process uses local Indigenous and First Nation rightsholder-affiliated, or proximity-based procurement outcome data, if at all, when conducting procurement planning or supplier engagement for the 2027-2031 period, including in relation to:</p> <ul style="list-style-type: none"> <li>(a) supplier outreach strategies;</li> <li>(b) RFP design;</li> <li>(c) contract packaging or bundling decisions;</li> <li>(d) prequalification requirements;</li> <li>(e) subcontracting requirements or transparency measures;</li> <li>(f) procurement category strategies; and</li> <li>(g) facility-level or project-level procurement planning.</li> </ul> <p>If such procurement outcome data is not used for one or more of the above purposes, please confirm that and explain what information OPG does rely on for those procurement planning decisions.</p>
D3-MC-006; F3-MC-011; F3-MC-012	Same as above.	
D3-MC-006; D3-MC-007; F3-MC-012; F3-MC-013	Same as above/by reference in response.	<p><b>9.</b> Please describe whether OPG has undertaken any existing analysis, review, or assessment of procurement categories or contract opportunities for the 2027-2031 period that may be suitable for participation by Indigenous, local, or rightsholder-affiliated suppliers, including in relation to:</p> <ul style="list-style-type: none"> <li>(a) site services;</li> <li>(b) logistics;</li> <li>(c) maintenance;</li> <li>(d) monitoring;</li> <li>(e) waste-related services;</li> <li>(f) construction support services; and</li> </ul>

		<p>(g) professional or technical services.</p> <p>If OPG has not undertaken such an analysis, please confirm whether suitability is considered in any other way within OPG's existing procurement evaluation, outreach, category management, or supplier engagement processes.</p>
D3-MC-006; F3-MC-012; F3-MC-013	Same as above.	<p><b>10.</b> Please describe how OPG's existing procurement, outreach, supplier engagement, Indigenous economic inclusion, or reporting processes account for the treaty-area and rightsholder context of the OPG's facilities, including:</p> <ul style="list-style-type: none"> <li>(a) whether OPG differentiates between Williams Treaties and Treaty 45 ½ rightsholder communities for procurement outreach or reporting purposes;</li> <li>(b) whether facility-specific or treaty-area-specific supplier outreach is undertaken;</li> <li>(c) whether rightsholder affiliation is considered in RFP evaluation, Indigenous engagement plans, supplier development, or subcontracting commitments;</li> <li>(d) whether OPG reports internally on procurement outcomes connected to those treaty areas or rightsholder communities;</li> <li>(e) whether any legal, operational, safety, or procurement considerations affect how OPG accounts for treaty-area or rightsholder context; and</li> <li>(f) how these existing processes relate to OPG's RAP reporting, implementation of the Directive, and supplier engagement processes.</li> </ul>