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File No. 43239.2

June 3, 2026

BY RESS
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Mr. Ritchie Murray
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Mr. Murray:

Re: Ontario Power Generation Inc. and DNNP LP Application for 2027-2031 Payment Amounts (EB-2025-0297)
WTFN Investment Holdings LP (“WTFN”)
Interrogatories on OEB Staff Expert Evidence

Further to the Ontario Energy Board’s (“**OEB**”) Procedural Order No. 2 dated March 4, 2026, enclosed are WTFN’s interrogatories on the OEB Staff’s expert evidence filed on May 26, 2026. WTFN acknowledges that the deadline for submission was June 2 and seeks OEB permission to file the enclosed interrogatories late due to a number of competing priorities. In light of this, WTFN curtailed the number of its interrogatories. WTFN submits that no prejudice will result, and it will not object to the granting of additional time for response, should it be requested by OEB Staff.

Please contact the undersigned with any questions.

Yours truly,

BORDEN LADNER GERVAIS LLP

A handwritten signature in black ink that reads 'Colm Boyle'. The signature is written in a cursive, flowing style.

Colm Boyle

CB/

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch. B;

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.

INTERROGATORIES TO OEB STAFF EXPERTS

Filed: June 3, 2026

1 **M2-WTFN-001:**

2 **Reference 1:** Exhibit M2, Research Report on Financing New Utility Investments; A2-Staff-016.

3 **Reference 2:** Electrification and Energy Transition Panel (EETP), Ontario's Clean Energy
4 Opportunity, s.4.3.

5 **Preamble 1:** OPG states in response to A2-Staff-016 that it is working with WTFN to explore
6 economic opportunities, including potential equity participation in DNNP. Attachment 1 to A2-
7 Staff-016 provides a copy of the letter from the Ministry of Energy and Mines that asks OPG to
8 prioritize economic reconciliation opportunities on OPG's major projects.

9 **Preamble 2:** The EETP Report states that to enable Indigenous participation and achieve true
10 partnerships, it is important to understand the economics of Indigenous governments and how they
11 differ from other forms of government in Canada.

12 **Questions:**

13 a) Section 2.2 of the research report provides a summary of the proposed financing for DNNP
14 LP. Did the research report consider equity investments by First Nations partners in DNNP
15 LP?

16 b) Do any of the financing examples of nuclear projects included in Table 1 include equity
17 investment by First Nations partners?

18 c) Does Christensen Associates agree that equity investment by a First Nations partner in a
19 single-asset generator, such as DNNP LP, is significantly riskier than investment in a
20 diversified generator with many different asset types, like OPG? If not, please explain why.

21 d) How do the conclusions of the research report prioritize economic reconciliation
22 opportunities for First Nations partners?

23 e) Please describe what consultation activities Christensen Associates undertook with First
24 Nations in preparing the research report.

25 f) How did Christensen Associates seek to understand the economics of Indigenous
26 governments, such as a potential equity investment by WTFN in DNNP LP, and how they
27 differ from other forms of government in Canada.

28

1 **M3-WTFN-002**

2 **Reference:** Exhibit M3.

3 **Preamble 1:** In section 4 of the report titled “Conclusions”, Christensen Associates states that a
4 reduced effective stretch factor weakens the link between OPG’s cost performance and its revenue
5 requirement, disincentivizing the utility to improve cost efficiency. Christensen Associates
6 attributes a portion of this potential cost inefficiency to the exclusion of \$2,385 million of the
7 2028-2031 revenue from DNNP. To correct for this, Christensen Associates proposes two
8 approaches to the OEB: (1) that in-service additions for the large capital program be included in
9 the “stretch amount” calculation; or (2) increase the stretch factor from 0.3 to 0.45.

10 In section 2.1 of the report, Christensen Associates states that the goal of a cost benchmarking
11 study for the purpose of setting a stretch factor is to uncover the regulated company’s expected
12 cost efficiency gains during the rate term. An appropriate cost benchmarking methodology
13 recovers the company’s cost performance using data on its costs, outputs, and exogenous operating
14 conditions. Differences in unit costs (e.g. TGC/MWh) can reflect differences in cost efficiency
15 levels if the proper adjustments are made to unit costs. A plant is more cost efficient than a peer if
16 it faces identical operating conditions, which are outside of its control, and is able to produce the
17 same or higher output by using fewer inputs.

18 In section 3.2.3 and 3.2.4, Christensen Associates assumes that OPG has similar efficiency
19 opportunities as distribution utilities operating under Custom IR.

20 **Questions:**

21 a) In the scenario where in-service additions for DNNP are included in the stretch factor
22 calculation:

23 i) Please explain the methodology and analysis Christensen Associates conducted to
24 support its conclusion that a stretch factor of 0.3 is appropriate for DNNP.

25 ii) Please provide a list of the peers used in the analysis in (a)(i) to benchmark DNNP.

26 iii) Please describe what unit and/or total costs were benchmarked between DNNP and
27 the peers listed in (a)(ii). Please provide any comparative cost analysis.

28 iv) How did Christensen Associates ascertain the expected sector productivity trend
29 for DNNP in the response to (a)(i)?

30 v) Please provide the analysis, spreadsheets, notes, workbooks and all other relevant
31 records for the responses to (a)(i) through (a)(iv) above.

32 b) In the scenario where the stretch factor is increased from 0.3 to 0.45:

- 1 i) What proportion of the 0.15 increase is attributed to the exclusion of DNNP revenue
2 requirement from adjustment by the stretch factor?
- 3 ii) Please explain the methodology and analysis Christensen Associates conducted to
4 support its conclusion that an increase in stretch factor of 0.15 is appropriate. In
5 particular, please describe and break out how DNNP factored into this analysis.
- 6 iii) Please provide a list of the peers used in the benchmarking analysis in above in
7 response to (b)(i) or (b)(ii).
- 8 iv) Please provide the analysis, spreadsheets, notes, workbooks and all other relevant
9 records for the responses to (b)(i) through (b)(iii) above.
- 10 c) Please describe in detail what methodology, analysis or rationale was used to support the
11 assumption that electricity distribution utilities are comparable to DNNP for the purposes
12 of establishing a stretch factor.
- 13 i) In response to this question, please explain how sector productivity trends for
14 electricity distributors are relevant benchmarks and can be relied upon to establish
15 a stretch factor for DNNP, which is a first of its kind nuclear generation facility.