DRAFT ISSUES LIST[1]

1.0 GENERAL

Primary

1.1. Is the overall increase in hydroelectric payment amounts including rate riders reasonable given the overall bill impact on customers?

1.2. Is the overall increase in nuclear payment amounts including rate riders reasonable given the overall bill impact on customers?

Secondary

1.3. Has OPG responded appropriately to all relevant OEB directions from previous proceedings?

1.4. Are OPG's economic and business planning assumptions that impact the prescribed facilities appropriate?

2.0 RATE BASE

Primary

2.1. Are the amounts proposed for the prescribed hydroelectric facilities rate base appropriate?

2.2. Are the amounts proposed for the nuclear facilities rate base appropriate?

2.3. Are the amounts proposed for the Darlington New Nuclear Program ("DNNP") facilities rate base appropriate?

3.0 CAPITAL STRUCTURE AND COST OF CAPITAL

Primary

3.1. Are OPG's proposed capital structure and rate of return on equity appropriate?

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[1] As required by the *Filing Requirements for Ontario Power Generation Inc.*, (September 17, 2024), OPG has proposed preliminary categorization of these issues into "primary" and "secondary" issues. In doing do, OPG has been guided by the OEB's ruling establishing the requirement to divide issues into these categories in EB-2010-0008. In its Decision and Order in that proceeding, the OEB ruled that, for future OPG payment amount applications, "*[I]ssues must be prioritized to ensure that the most significant issues, in terms of dollars and/or in terms of principle, are adequately investigated to ensure an appropriate outcome. The Board and the process are best served by the thorough investigation of the highest priority issues*" (pp. 6-7).

3.2. Are DNNP LP's proposed capital structure and rate of return on equity appropriate?

Secondary

3.3. Are OPG's proposed costs for the long-term and short-term debt components of its capital structure appropriate?

3.4. Are DNNP LP's proposed costs for the long-term and short-term debt components of its capital structure appropriate?

4.0 CAPITAL PROJECTS

Hydroelectric

Primary

4.1. Do the costs associated with the hydroelectric projects that are subject to section 6(2)4 of O. Reg. 53/05 and proposed for recovery meet the requirements of that section?

4.2. Are the proposed hydroelectric capital expenditures and/or financial commitments reasonable?

4.3. Are the proposed IR term in-service additions for hydroelectric projects appropriate?

Nuclear

Primary

4.4. Do the costs associated with the nuclear projects that are subject to section 6(2)4 of O. Reg. 53/05 and proposed for recovery meet the requirements of that section?

4.5. Are the proposed nuclear capital expenditures and/or financial commitments (excluding those for the Pickering Refurbishment Program ("PRP") and the DNNP) reasonable?

4.6. Are the proposed IR term in-service additions for nuclear projects (excluding those for the PRP and DNNP) appropriate?

PRP

Primary

4.7. Are the proposed nuclear capital expenditures and/or financial commitments for the PRP reasonable?

4.8. Are the proposed IR term in-service additions for the PRP appropriate?

DNNP

Primary

4.9. Are the proposed nuclear capital expenditures and/or financial commitments for the DNNP reasonable?

4.10. Are the proposed IR term in-service additions for the DNNP appropriate?

5.0 PRODUCTION FORECASTS

Primary

5.1. Is the proposed hydroelectric production forecast appropriate?

5.2. Is the proposed nuclear production forecast appropriate?

5.3. Is the proposed DNNP facilities production forecast appropriate?

6.0 MARKET RENEWAL IMPACTS

Primary

6.1. Is the proposed Hydroelectric Surplus Baseload Generation Variance Account spill calculation methodology appropriate?

6.2. Is the proposed Hydroelectric Incentive Mechanism ("HIM") methodology and HIM adjustment for spill appropriate?

6.3. Is the proposed treatment of make whole payments appropriate?

7.0 OPERATING COSTS

Primary

7.1 Is the IR term Operations, Maintenance and Administration ("OM&A") budget for the hydroelectric facilities appropriate?

7.2 Is the IR term OM&A budget for the nuclear facilities appropriate?

7.3 Is the IR term OM&A budget for the DNNP appropriate?

Secondary

7.4 Is the hydroelectric benchmarking methodology reasonable? Are the benchmarking results and targets flowing from OPG's hydroelectric benchmarking reasonable?

7.5 Is the nuclear benchmarking methodology reasonable? Are the benchmarking results and targets flowing from OPG's nuclear benchmarking reasonable?

Corporate Costs

Primary

7.6 Are the IR term human resource related costs (including wages, salaries, payments under contractual work arrangements, benefits, incentive payments, overtime, FTEs and pension costs) appropriate?

7.7 Are the corporate costs allocated to the hydroelectric business appropriate?

7.8 Are the corporate costs allocated to the nuclear business appropriate?

7.9 Are the corporate costs allocated to the DNNP appropriate?

7.10 Are the centrally held costs allocated to the hydroelectric business appropriate?

7.11 Are the centrally held costs allocated to the nuclear business appropriate?

7.12 Are the centrally held costs allocated to the DNNP appropriate?

Depreciation

Secondary

7.13 Is the proposed IR term hydroelectric depreciation expense appropriate?

7.14 Is the proposed IR term nuclear depreciation expense appropriate?

7.15 Is the proposed IR term DNNP depreciation expense appropriate?

Income and Property Taxes

Secondary

7.16 Are the amounts proposed to be included in the IR term hydroelectric revenue requirement for income and property taxes appropriate?

7.17 Are the amounts proposed to be included in the IR term nuclear revenue requirement for income and property taxes appropriate?

7.18 Are the amounts proposed to be included in the IR term DNNP revenue requirement for income and property taxes appropriate?

Other Costs

Secondary

7.19 Are the asset service fee amounts charged to the hydroelectric business appropriate?

7.20 Are the asset service fee amounts charged to the nuclear business appropriate?

7.21 Are the asset service fee amounts charged to the DNNP appropriate?

8.0 OTHER REVENUES

Non-Energy Revenues

Secondary

8.1 Are the forecasts of prescribed hydroelectric facilities' non-energy revenues appropriate?

8.2 Are the forecasts of nuclear non-energy revenues appropriate?

Bruce Generating Station

Secondary

8.3 Are the IR term costs related to the Bruce Generating Station, and costs and revenues related to the Bruce lease appropriate?

9.0 NUCLEAR WASTE MANAGEMENT AND DECOMMISSIONING LIABILITIES

9.1 Is the revenue requirement impact of the nuclear liabilities appropriately determined?

10.0 DEFERRAL AND VARIANCE ACCOUNTS

Primary

10.1 Are the deferral and variance accounts that OPG proposes to establish appropriate?

Secondary

10.2 Is the nature or type of costs recorded and the methodologies used to record costs in the deferral and variance accounts appropriate?

10.3 Are the balances for recovery and the proposed disposition amounts in each of the deferral and variance accounts appropriate?

10.4 Is the proposed continuation of deferral and variance accounts appropriate?

11.0 REPORTING AND RECORD KEEPING REQUIREMENTS

Secondary

11.1 Are the proposed reporting and record keeping requirements, including performance scorecards proposed by OPG, appropriate?

12.0 METHODOLOGIES FOR SETTING PAYMENT AMOUNTS

Primary

12.1 Is OPG’s approach to incentive rate-setting for establishing the hydroelectric payment amounts appropriate?

12.2 Is OPG’s approach to incentive rate-setting for establishing the nuclear payment amounts appropriate?

12.3 Do the Concurrent Cost Recovery amounts proposed meet the requirements set out in s. 6(2)12.1i and 14(2)5i of O. Reg. 53/05?

12.4 Is OPG’s proposal for intra-period payment amount shaping appropriate?

13.0 IMPLEMENTATION

Primary

13.1 Are the effective dates for new payment amounts and riders appropriate?