

DARLINGTON REFURBISHMENT PROGRAM

OVERVIEW

1.0 OVERVIEW

The Darlington Refurbishment Program (“DRP”) is a multi-year, multi-phase mega-project that will enable the Darlington Nuclear Generating Station (“Darlington”) to continue safe and reliable operation until approximately 2055. The DRP includes the replacement of life-limiting critical components, the completion of upgrades to meet applicable regulatory requirements, and the rehabilitation of components at Darlington’s four units. The DRP is comprised of individual projects of various scales and sizes that are being executed during multi-year outages on each of the four units. The DRP began in 2007 and is being completed in three phases: Initiation (2007-2009), Definition (2010-2015), and Execution (2016-2026). The first three units to undergo refurbishment have been successfully returned to service.

OPG is now nearing the end of this mega project, with the last unit currently expected to return to service during this proceeding, on time, on budget, safely and with quality. Post-refurbishment, all units have performed well and are delivering to their planned production targets with no major issues as a result of work completed in refurbishment.

OPG is currently forecasting the final cost of the DRP to be \$12.7B, which is approximately (-\$100M) under the Release Quality Estimate (“RQE”) budget, the baseline against which the cost of the program is measured. In addition to being on track to deliver the DRP’s scope within the \$12.8B budget, OPG has successfully managed the program and pursued cost efficiencies in the execution of the DRP, allowing it to offset the incremental costs associated with the black swan¹ COVID-19 pandemic. As a result, the DRP has remained within budget, and the Application is not seeking incremental recovery of costs due to the COVID-19 pandemic.

¹ A “black swan event” refers to a highly improbable, unpredictable, and impactful occurrence that comes as a surprise, often with significant negative consequences.

1 The settlement proposal approved by the OEB in the EB-2020-0290 Decision and Order states:

2
3 The Parties agree that forecasted nuclear capital expenditures
4 and financial commitments and in-service additions for the DRP
5 are reasonable and appropriate and form part of the settled
6 forecast rate base for the 2022-2026 period on the basis that
7 they remain within the total \$12.8B project budget first set out in
8 EB-2016-0152. The OEB will review the prudence of any
9 amounts sought by OPG in excess of the \$12.8B total, the
10 appropriateness of any future material changes to the scope of
11 the DRP and any corresponding changes in contracts, when
12 OPG seeks disposition of the actual DRP costs through the
13 Capacity Refurbishment Variance Account.²
14

15 OPG expects that the last unit, Unit 4, will be returned to service by April 2026, ahead of the
16 High Confidence Schedule approved in EB-2020-0290.³ There have been no material changes
17 to the scope of the DRP and, as noted, OPG expects the final costs of the DRP to be within
18 the approved \$12.8B budget. The total expenditures over the life of the DRP, including amounts
19 budgeted for 2025 and 2026, are summarized in Ex. D2-2-3, Table 1a.
20

21 Also, in EB-2020-0290, the OEB conducted a prudence review of the Heavy Water Storage
22 and Drum Handling Facility (“D2O Storage Project”) that formed part of the DRP. In its Decision
23 and Order, the OEB approved 2020-2026 in-service additions of \$381M,⁴ which factors in a
24 permanent rate base disallowance of \$113.7M to the total cost that OPG proposed to add to
25 rate base for the D2O Storage Project.⁵ OPG is not seeking cost recovery for any additional
26 amounts related to the D2O Storage Project in this application. The full \$509.3M cost of the
27 project continues to be considered in the assessment of OPG’s DRP performance against the
28 \$12.8B budget.

² OEB Decision and Order, EB-2020-0290, November 15, 2021, p. 86.

³ The High Confidence Schedule for the refurbishment outage of a Darlington unit refers to the schedule OPG utilizes as the basis of its public commitments to stakeholders, including the Government of Ontario, the Independent Electricity System Operator, the OEB and others. This schedule includes contingency amounts quantified based on a detailed analysis of risks. OPG also utilizes another shorter schedule, known as the Working Schedule, for day-to-day management of the refurbishment outages and for measuring performance on the outages, allowing for early escalation of issues.

⁴ In-service additions included in Ex. B3-3-1, Table 1, line 3.

⁵ OEB Decision and Order, EB-2020-0290, November 15, 2021, p. 2.

1 Over the life of the DRP, there have been variances in the amount and timing of capital and
2 non-capital expenditures and capital in-service amounts from those forecasts reflected in the
3 OEB-approved nuclear revenue requirements. The revenue requirement impacts of such
4 variances are recorded in the Capacity Refurbishment Variance Account ("CRVA") pursuant to
5 Ontario Regulation 53/05. With the exception of certain amounts dispositioned in EB-2020-
6 0290 and EB-2023-0336, these impacts have been accumulating in the account since 2016.⁶
7 As DRP is now near completion, the Application seeks disposition of all such variances
8 recorded in the account as of December 31, 2024, for a net recoverable amount of \$170.2M.
9 In doing so, OPG commits, based on the current forecast, not to seek recovery in any future
10 application of any unlikely final costs of the DRP that exceed the \$12.8B budget. For details
11 on the DRP related balances recorded in the CRVA as of December 31, 2024, as well as a
12 forecast of such entries for 2025 and 2026, refer to Ex. H1-1-1, Section 5.6.2.1 and Ex. H1-1-
13 1, Tables 15 and 16.

14
15 This evidence at Ex. D2-2-1 to Ex. D2-2-3 provides a summary of the DRP, confirms that there
16 have been no material changes to the scope of the DRP, and provides the details to support
17 the forecasted final cost of the DRP at \$12.7B.

18 19 **2.0 PROGRAM SUMMARY**

20 In the EB-2016-0152 application, OPG provided evidence that it had completed the Definition
21 Phase of the DRP, all major contracts required to execute the scope of the DRP had been
22 awarded, and the detailed planning conducted by OPG and its contractors had enabled the
23 development of a four-unit budget and schedule for the successful execution of the DRP,
24 known as the RQE. The RQE was finalized in November 2015 and established a four-unit,
25 program-level control budget of \$12.8B that serves as the baseline against which the success

⁶ In EB-2020-0290, the OEB-approved settlement proposal provided for clearance of the impact of accelerated investment incentive property rules on DRP-related Capital Cost Allowance amounts, and the OEB's Decision and Order regarding the D2O Storage Project resulted in an adjustment to amounts previously recorded in the account. In EB-2023-0336, the OEB-approved settlement proposal provided for clearance of the amounts recorded in the account for the D2O Storage Project as adjusted by the OEB's Decision and Order in EB-2020-0290.

1 of the DRP is being measured.⁷ The RQE was the basis upon which OPG's Board of Directors
2 granted approval to proceed from the Definition Phase to the Execution Phase of the DRP in
3 November 2015, the basis of the Province's announced endorsement of the DRP on
4 January 11, 2016 and the basis of OPG's pre-filed evidence on the total expected cost of the
5 DRP in EB-2016-0152.⁸

6
7 Subsequent to the RQE, and prior to the start of the Unit 2 refurbishment outage, as planned,
8 OPG completed a more refined estimate of the cost and schedule for refurbishing Unit 2 and
9 a corresponding update to the DRP budget and schedule, known as the Unit 2 Execution
10 Estimate ("U2EE"), in August 2016. The U2EE was the basis upon which OPG's Board of
11 Directors granted approval to proceed with the execution of the Unit 2 refurbishment outage.
12 The U2EE maintained the four-unit, program-level control budget of \$12.8B.⁹ OPG did not
13 update its revenue requirement in EB-2016-0152 to reflect the U2EE on the basis that the
14 CRVA would capture any revenue requirement impacts of changes to in-service dates and in-
15 service amounts between such OEB-approved and actual impacts. The OEB agreed with this
16 approach.¹⁰ The U2EE is the baseline against which OPG measured its performance during
17 the execution of the Unit 2 refurbishment.

18
19 In the EB-2016-0152 application, OPG provided evidence that it had established the
20 appropriate organization, project controls, change management and oversight to manage,
21 control, report on, and take corrective actions, as required, to be able to complete the DRP
22 safely, on budget, on schedule and with the required quality. OPG sought and received
23 approval from the OEB for in-service additions of \$4,800.2M related to Unit 2 (including the
24 Definition Phase) in 2020 and 2021, as well as \$377.2M related to Unit Refurbishment Early

⁷ The impact of the COVID-19 pandemic in 2020 on the cost and schedule for the DRP could not have been foreseen at the time of the RQE. OPG deferred the start date of the Unit 3 refurbishment in 2020 in response to the pandemic and correspondingly revised the refurbishment start dates for Units 1 and 4. See EB-2020-0290, Ex. D2-2-3 for more details.

⁸ Province of Ontario, News Release: Ontario Moving Forward with Nuclear Refurbishment at Darlington and Pursuing Continued Operations at Pickering to 2024, January 11, 2016 <<https://news.ontario.ca/en/release/35478/ontario-moving-forward-with-nuclear-refurbishment-at-darlington-and-pursuing-continued-operations-at.html>>.

⁹ EB-2016-0152, Ex. L-4.3-1 Staff-055.

¹⁰ Decision and Order, EB-2016-0152, December 28, 2017, p. 39.

1 In-Service Projects, Facilities & Infrastructure Projects (“F&IP”) and Safety Improvement
2 Opportunities (“SIO”), for a total of \$5,177.4M.¹¹ The \$377.2M in-service additions for Early In-
3 Service Projects, SIO and F&IP were distributed over 2016 (the bridge year in the EB-2016-
4 0152 application) to 2021.

5
6 In its Decision and Order for EB-2016-0152, the OEB stated the following:

7
8 The OEB finds that the planning undertaken by OPG for the DRP
9 was reasonable. The OEB notes that both experts agreed that
10 the planning for the DRP had been conducted according to
11 industry standards. The OEB finds that OPG has developed
12 reasonable project control systems to manage the cost and
13 schedule of the DRP. OPG also performed adequate risk
14 assessment for the project and put in place processes to
15 address risks as they arise.

16
17 The OEB also finds that the oversight structure that OPG has
18 designed to monitor the DRP appears appropriate. As previously
19 discussed, there are multiple layers of oversight with respect to
20 DRP that should allow OPG to react appropriately to potential
21 issues. The oversight for the project includes both internal and
22 external expertise and resources.¹²
23

24 In the EB-2020-0290 application, OPG provided evidence that it started refurbishment of Unit 2
25 as planned on October 15, 2016, and returned Unit 2 to service on June 4, 2020, just over
26 three months later than its committed schedule. Of note, the final two-and-a-half months of the
27 Unit 2 refurbishment outage were completed under the state of emergency declared in Ontario
28 on March 17, 2020 as a result of the COVID-19 pandemic. Over the 2016-2024 period, there

¹¹ Early-In-Service projects are those that provide benefit to the station prior to the return-to-service date of the nuclear unit under refurbishment. Examples include in-plant modifications which are of immediate benefit to multiple or all units.

F&IP are projects that do not involve the refurbishment of units but which are necessary to enable execution of the unit refurbishments and are expected to be useful to OPG’s current and future nuclear operations independent of the DRP. A number of the F&IP involve upgrades to Darlington site infrastructure to ensure it can effectively support continued operations for 30 or more years. To meet required in-service dates, OPG commenced the F&IP work early in the Definition Phase of the DRP.

SIO are initiatives which OPG committed to in the Environmental Assessment (“EA”) for the DRP, primarily to address beyond-design-basis or four-unit events. The need for this work was established through the EA, which was filed with the Canadian Nuclear Safety Commission. To meet required in-service dates, OPG commenced execution of SIO work early in the Definition Phase of the DRP.

¹² OEB Decision and Order, EB-2016-0152, December 28, 2017, p. 36.

1 was a +2.4% variance (+\$126.0M) in DRP in-service amounts relative to the OEB-approved
2 amounts for the period in EB-2016-0152 (\$5,177.4M).¹³ This variance was not reflected in the
3 opening rate base for EB-2020-0290, as OPG proposed to defer the clearance of any such
4 amounts to a future application to allow an assessment of the recoverability of any DRP-related
5 variances in the context of the overall performance of the complete four-unit refurbishment.
6 This approach is consistent with the DRP being a single mega-project as opposed to a
7 collection of smaller projects, and with the OEB-approved Settlement Proposal in EB-2020-
8 0290 as noted above.

9
10 For the subsequent Units 3, 1, and 4 (together, the "Subsequent Units"), OPG provided
11 evidence in EB-2020-0290 that it had performed the detailed planning that was necessary,
12 including the incorporation of lessons learned¹⁴ from Unit 2 and the implementation of strategic
13 improvements, to establish the High Confidence Schedule and cost estimates for completing
14 the refurbishment of the Subsequent Units and the overall DRP in 2026, safely and with quality.
15 OPG also provided evidence that it had the appropriate organization, project controls, change
16 management and oversight in place to manage, control, report on, and take corrective actions,
17 as required, to be able to complete the DRP safely, on budget, on schedule and with the
18 required quality.

19
20 OPG's EB-2020-0290 evidence presented the final Unit 3 Execution Estimate ("U3EE") that
21 included the schedule impacts of the COVID-19 pandemic, and was the baseline against which
22 OPG and its Board of Directors measured the Company's performance during the execution
23 of the Unit 3 refurbishment.¹⁵ The U3EE served as the underlying basis for the in-service
24 amounts requested and approved in the EB-2020-0290 application. It maintained the four-unit,
25 program-level control budget of \$12.8B, excluding any impact of the COVID-19 pandemic. In
26 addition, the DRP schedule was reassessed as a result of the COVID-19 pandemic. The U3EE

¹³ A \$132.7M forecast variance was noted in EB-2020-0290, Ex. D2-2-1, p. 3; the change in the variance was due to the actualization of costs.

¹⁴ "Lessons Learned" refers to specific and detailed knowledge and experience gained during a process, project, or activity which, when applied to the same or similar processes, projects or activities in the future, results in improved performance. "Strategic Improvements" are new approaches and/or innovative methods for planning and executing the Subsequent Units' refurbishments that are implemented in addition to Lessons Learned.

¹⁵ EB-2020-0290, Ex. D2-2-7, Attachment 1.

1 maintained the High Confidence Schedule durations for the Unit 3, Unit 1, and Unit 4
2 refurbishment outage, although the start dates for each Unit were deferred relative to the RQE,
3 due to the pandemic. The deferral of the Unit 3 refurbishment had a cascading impact on the
4 Subsequent Units' refurbishment start dates as no additional overlap was introduced during
5 the schedule reassessment.

6
7 Consistent with the U3EE, in EB-2020-0290, OPG sought and received approvals in respect
8 of the refurbishment of the Subsequent Units, comprising \$6,442.6M for in-service additions
9 to rate base and \$110.5M for OM&A expenditures over the 2022-2026 period. The approved
10 in-service additions comprised: (1) \$1.4M in 2023 for an Early In-Service Project associated
11 with Unit 1, (2) \$2,505.5M in 2024 which included \$2,504.0M for completion of the Unit 3 and
12 \$1.6M for an Early In-Service Project associated with Unit 4; (3) \$1,907.3M in 2025 on
13 completion of Unit 1; and, (4) \$2,028.3M in 2026 on completion of Unit 4.¹⁶

14
15 OPG did not seek approval of any COVID-19 pandemic-related costs in the EB-2020-0290
16 application. OPG elected to continue to monitor, assess and explore potential efficiencies
17 during the execution of the Subsequent Units' refurbishments with a view to complete the DRP,
18 inclusive of the COVID-19 cost impacts, within the \$12.8B budget established at the time of
19 the RQE, if possible. OPG indicated that any ultimate variance to the \$12.8B caused by the
20 COVID-19 pandemic would be tracked separately and addressed through the CRVA in a future
21 proceeding.

22
23 Since EB-2020-0290, OPG completed the refurbishment of Unit 3 by successfully returning it
24 to service on July 18, 2023. Compared to the final U3EE that underpinned the revenue
25 requirements approved in EB-2020-0290, the refurbishment of Unit 3 was completed within
26 budget, 169 days ahead of the High Confidence Schedule, with an in-service addition of
27 \$2,295M.

¹⁶ Decision and Order, EB-2020-0290, November 15, 2021, p. 87.

1 Consistent with the planning approach to the Unit 2 and Unit 3 refurbishments, following EB-
2 2020-0290, OPG further updated the DRP budget and schedule as part of the Unit 1 Execution
3 Estimate ("U1EE") in November 2021. The U1EE established the baseline against which OPG
4 and its Board of Directors measured the company's performance during the execution of the
5 Unit 1 refurbishment. The High Confidence Schedule duration remained at 38 months as it was
6 at the time of the RQE and the U3EE. The U1EE maintained the four-unit, program-level
7 control budget of \$12.8B, excluding any ultimate impact of the COVID-19 pandemic.

8
9 The refurbishment outage for Unit 1 began February 15, 2022, and was completed when the
10 unit was successfully returned to service on November 27, 2024. The refurbishment of Unit 1
11 was completed within budget, 142 days ahead of the High Confidence Schedule, with an in-
12 service addition of \$1,732M.

13
14 As planned, OPG completed the Unit 4 Execution Estimate ("U4EE") in March 2023 which
15 maintained the High Confidence Schedule duration at 37 months as it was at the time of the
16 RQE and the U3EE. The Unit 4 refurbishment outage began on July 19, 2023 with a return to
17 service planned for August 2026 at the time, per the High Confidence Schedule. The U4EE
18 maintained the four-unit, program-level control budget of \$12.8B, excluding any ultimate
19 impact of the COVID-19 pandemic. As set out in OPG's 2025-2031 Business Plan, Unit 4 is
20 planned to be returned to service on April 15, 2026 three and half months ahead of the High
21 Confidence Schedule, with a planned in-service addition of \$2,292M, which continues to
22 remain within the \$12.8B budget.

23
24 OPG has made quarterly DRP performance update reports available to the public through its
25 website since the start of the Unit 2 refurbishment and will continue this practice until the
26 completion of the DRP. Each public report covers the four project pillars of safety, quality, cost,
27 and schedule. Additionally, in accordance with the OEB's Decision and Order in EB-2016-
28 0152¹⁷ and EB-2020-0290,¹⁸ OPG has filed with the OEB detailed annual reports at the end of

¹⁷ OEB Decision and Order, EB-2016-0152, December 28, 2017, pp. 43-45.

¹⁸ OEB Decision and Order, EB-2020-0290, November 15, 2021, p. 117.

each year beginning in 2018 on the progress of the DRP. The annual reports are posted online and include a range of measures of safety, quality, cost, and schedule performance. OPG will continue to issue such annual reports until Unit 4 returns to service in 2026.¹⁹

In this Application, through Ex. D2-2-1 to Ex. D2-2-3, OPG provides an update on the progress of the DRP and further evidence that it has effectively managed the DRP and expects to complete it within the \$12.8B budget approved in EB-2020-0290. The evidence in this Ex. D2-2-1 through Ex. D2-2-3 demonstrates that:

- OPG has successfully performed the Units 2, 3 and 1 refurbishments and returned the units to service. OPG also successfully delivered on its commitment to pursue unit over unit efficiencies, incorporating lessons learned from the preceding unit(s) and implementing strategic improvements where possible.
- OPG is on track to deliver the last unit, Unit 4, on-time, safely and with quality, and within the \$12.8B program budget approved in EB-2020-0290.
- The total forecast cost of \$12.7B for completing the DRP, including the impact of the COVID-19 pandemic, remains within the baseline estimate of \$12.8B, as established in the RQE. OPG has planned for these costs to be finalized in 2026 but expects that a minor amount may fall into the first half of 2027 as part of project close out activities. These amounts will be reconciled through the CRVA. An annual breakdown of the \$12.7B forecasted total program expenditures is provided in Ex. D2-2-3, Table 1A.

Chart 1 provides a summary of the High Confidence Schedule durations for the refurbishment outage of each of the four units compared to the actual or forecasted durations based on the actual or forecasted start dates and end dates. As identified in EB-2020-0290 and noted above,²⁰ the schedules reflect the impact of OPG's response to the COVID-19 pandemic that resulted in a later start date for the refurbishment outage of Unit 3 in 2020 and correspondingly later start dates for the Units 1 and 4 refurbishment outages in subsequent years. The Unit 3 and Unit 1 refurbishments incorporated lessons learned from the preceding unit(s) and the

¹⁹ Minor amount of project closeout costs may fall into the first half of 2027.

²⁰ Unit 2 high confidence duration of 40 months obtained from EB-2016-0152, Ex. D2-2-1, p. 2. Subsequent Unit durations of 40, 38 and 37 months obtained from EB-2020-0290, Ex. D2-2-5, p. 6.

implementation of strategic improvements, resulting in a ten-month improvement on the Unit 3 refurbishment duration compared to Unit 2, and an additional one-month improvement on the duration of the Unit 1 refurbishment compared to Unit 3. Examples of lessons learned are provided in Ex. D2-2-2, Attachment 1.

Chart 1 – High Confidence Schedule Duration as of RQE compared to Actual and Forecast Performance by Unit

	High Confidence Duration (Months)	Start (Actual)	End (Actual/ Forecast)	Actual/Forecast Duration (Months)
Unit 2	40	15-Oct-2016	04-Jun-2020 (A)	44
Unit 3	40	03-Sep-2020	18-Jul-2023 (A)	34
Unit 1	38	15-Feb-2022	27-Nov-2024 (A)	33
Unit 4	37	19-Jul-2023	15-Apr-2026 (F)	33

Chart 2 provides a simplified breakdown of the \$12.8B program costs as of EB-2020-0290 compared to the actual and forecast spend currently. The Unit 3 refurbishment capital cost was under budget at \$2,295M, while the Unit 1 refurbishment capital cost was under budget at \$1,732M.

**Chart 2 – Simplified Breakdown of Total Estimate to Complete
Subsequent Units**

Program Component	DRP Program Cost as of EB- 2020-0290 (\$M)	Total Cost (Actual/Forecast) (\$M)
Capital		
Unit 2 (including definition)	4,762 ¹	4,766 (A)
Early In-Service (all units)	201 ²	193 (F)
Unit 3	2,504 ³	2,295 (A)
Unit 1	1,907 ⁴	1,732 (A)
Unit 4	2,028 ⁵	2,292 (F)
F&IP and SIO	628 ⁶	630 (A)
D2O Storage Project	509 ⁷	509 (A)
OM&A		
Project OM&A	261 ⁸	283 (F)
Total	12,800	12,700 (F)

Notes:

¹ EB-2020-0290, Ex. D2-2-9, Table 2: Total Project Cost (g) for Unit 2 (line 5)

² EB-2020-0290, Ex. D2-2-9, Table 2: Total Project Cost (g) (lines 7 to 9) + EB-2020-0290, Ex. D2-2-9, Table 3: Total Project Cost (h)(lines 4 to 8) + EB-2020-0290, Ex. D2-2-9, Table 4: Total Project Cost (b)(line 1)

³ EB-2020-0290, Ex. D2-2-9, Table 2: Total Project Cost (g) for Unit 3 (line 1)

⁴ EB-2020-0290, Ex. D2-2-9, Table 2: Total Project Cost (g) for Unit 1 (line 2)

⁵ EB-2020-0290, Ex. D2-2-9, Table 2: Total Project Cost (g) for Unit 4 (line 3)

⁶ EB-2020-0290, Ex. D2-2-9, Table 2: Total Project Cost (g)(lines 10 to 17) + EB-2020-0290, Ex. D2-2-9, Table 3: Total Project Cost (h) (lines 3, 9 to 11). Per EB-2020-0290, D2-2-9, Table 2: note 2, F&IP total project cost and release information reflect approved business case summaries and balancing adjustment

⁷ EB-2020-0290, Ex. D2-2-9, Table 2: Total Project Cost (g) for D2O Storage Project (line 6)

⁸ EB-2025-0297, Ex. D2-2-3, Table 1a: 2010 to 2019 actuals (a to j) (line 1) + EB-2020-0290, Ex. F2-7-1 Table 1: 2020 to 2026 budget (e to k) (line 4)

Some of the Unit 3 and Unit 1 cost savings resulting from strong performance and tightened risk profiles were partly carried over into the current U4EE forecast, helping to fund several aspects of the Unit 4 cost that were not present for the immediately preceding Unit 1, including a CanAtom execution phase incentive payable at the end of the program, demobilization costs assigned to Unit 4, and higher functional costs due to a shorter overlap period with another unit refurbishment. The currently planned Unit 4 capital cost is \$2,292M, which also includes

1 remaining program contingency to address any risks during the remainder of the DRP. Any
2 unutilized contingency upon completion of Unit 4 remaining amounts will be reconciled through
3 the CRVA.

4 5 **3.0 APPROVALS SOUGHT**

6 The Application proposes to clear all remaining DRP-related balances recorded in the CRVA
7 as of December 31, 2024 and commits not to seek recovery, in any future application, of any
8 unlikely final costs of the DRP that exceed the approved \$12.8B budget. Subject to this
9 commitment, OPG would record in the CRVA the revenue requirement of any differences
10 between the amount and timing of the remaining actual expenditures and in-service amounts
11 for the DRP and those forecasts reflected in the IR term revenue requirements approved in
12 this proceeding.

13
14 Given that actual costs for recovery would not exceed the \$12.8B budget, OPG seeks a final
15 determination of all DRP costs in this Application. OPG proposes that any DRP-related
16 amounts recorded in the CRVA subsequent to 2024 be allowed for recovery in a future
17 application on a mechanical basis, subject to the amounts being accurately recorded. The
18 DRP-related account entries would cease upon the effective date of a subsequent payment
19 amounts order that reflects the final actual in-service additions, not to exceed the \$12.8B
20 budget, in the payment amounts.