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February 10, 2016

Via Email and Courier

Ms. Kirsten Walli
Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: EB-2015-0374: OPG Accounting Order Application

This letter is in response to the letter dated February 5, 2016 filed with the Ontario Energy Board ("OEB") by the School Energy Coalition ("SEC). SEC requested additional information in respect of OPG's application and draft accounting order filed in this matter.

In particular, below is OPG's response to the information requests made by SEC in its letter:

- 1. Estimated entries based on the extensions effective December 31, 2015, including all related calculations, all using existing information...*

In this regard, OPG notes that this proceeding relates to the establishment of the account and the right to record entries. The evaluation of the entries and information related to the entries is relevant to the Board when OPG seeks disposition of the account. However, such an understanding of the particulars is not required to evaluate the materiality of the sum total of the entries in the account.

As SEC notes in its letter these are complex calculations. Accordingly, if the Board requires OPG to provide such information, the assembly of such data will take some time to prepare. OPG believes that information to address this request could be filed by February 26, 2016, as described below.

2. *Further detail on any additional possible or probable changes/entries that could arise in 2016 and beyond, based on current forecasts and construction schedules...*

The account sought by OPG does not deal with changes in 2016 and as such changes in cost of capital, taxes, useful lives, construction schedules and the like after December 15, 2015 would have no impact on this account and are not related to OPG's request.

3. *Clear specification of the baselines for each of the components of the calculations...*

As part of its main rate applications, OPG files evidence to explain the nuclear liability costs reflected in its proposed revenue requirement. The evidence specifically addresses the impact of changes on its nuclear liabilities and provides the impact on revenue requirement for the prescribed facilities. An example of this information is EB-2013-0321, Ex. C2-1-1, Table 5; which shows the costs without the impact of the adjustment to nuclear liabilities, the costs with the change in the nuclear liabilities, and the revenue requirement difference between the two. The impact of the changes which gave rise to the need for this accounting order application will be provided by OPG in a similar format as part of its currently planned rate application, due to be filed in 2016.

If the OEB was to require that OPG provide the information requested by SEC under items 1 and 3 as part of this proceeding, then OPG would propose to present this information and non-ARC costs in the same manner as it has filed such information in the past and plans to present in the upcoming application (i.e., in the form of Ex. C2-1-1) for consistency and ease of use purposes. However, because of the complexity in preparing this data, and as noted above, OPG does not expect to be in a position to provide this information until February 26, 2016.

Yours Truly,

Original signed by:

Andrew Barrett
Vice President, Regulatory Affairs
Ontario Power Generation Inc.

cc: Charles Keizer, Torys
Carlton Mathias, OPG