

September 4, 2019

VIA EMAIL

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

Dear Ms. Walli:

Re: EB-2019-0209 – 2020 Annual Hydroelectric Payment Amount Adjustment

Attached please find an application by Ontario Power Generation Inc. ("OPG") for an order or orders approving a payment amount for its regulated hydroelectric facilities. I am providing three (3) paper copies of OPG's prefiled evidence.

OPG is also submitting this application on the Regulatory Electronic Submission System ("RESS"). This material will be available on OPG's website at <https://www.opg.com> in due course.

Yours truly,

[Original signed by]

Matt Kirk

Att.

cc: Charles Keizer (Torys) via email
Aimee Collier (OPG) via email

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ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*;

AND IN THE MATTER OF an Application by Ontario Power Generation Inc. for an order or orders approving a payment amount for hydroelectric generating facilities prescribed under Ontario Regulation 53/05 of the Act, as amended, commencing January 1, 2020.

APPLICATION

1. The applicant, Ontario Power Generation Inc. (“OPG”) is a corporation, incorporated under the Ontario *Business Corporations Act*, with its head office in the City of Toronto. The principal business of OPG is the generation and sale of electricity in Ontario.
2. In this Application, OPG applies to the Ontario Energy Board (“OEB”) pursuant to section 78.1 of the *Ontario Energy Board Act, 1998*, (the “Act”), for an order or orders approving a payment amount for hydroelectric generating facilities (the “regulated hydroelectric facilities”) prescribed under Ontario Regulation 53/05 of the Act, as amended, (“O. Reg. 53/05”) effective January 1, 2020.
3. For the purposes of section 6 (1) of O. Reg. 53/05, OPG requests that the OEB use the price-cap index methodology for the prescribed hydroelectric generating facilities approved in the EB-2016-0152 Decision and Order dated December 28, 2017 for the period from January 1, 2017 through December 31, 2021 to determine the 2020 payment amount.
4. OPG seeks an order declaring the current payment amount interim effective January 1, 2020 for the regulated hydroelectric facilities, if the order or orders approving the payment amount are not implemented by January 1, 2020 for the regulated hydroelectric facilities.
5. The Application will be supported by written evidence. The written evidence filed by OPG may be supplemented or amended from time to time by OPG prior to the OEB’s final decision on the Application.

- 1 6. OPG requests that pursuant to section 32.01 of the OEB Rules of Practice and Procedure,
2 this proceeding be conducted by way of a written hearing.
- 3 7. OPG requests that pursuant to section 6(1) of the Act, this proceeding be administered
4 under delegated authority.
- 5 8. OPG further applies to the OEB pursuant to the provisions of the Act and the OEB Rules
6 of Practice and Procedure for such orders and directions as may be necessary in relation
7 to the Application and the proper conduct of this proceeding.
- 8 9. The persons affected by this Application are all electricity consumers in Ontario.
- 9 10. OPG requests that copies of all documents filed with the OEB by each party to this
10 Application along with copies of all comments filed with the OEB in accordance with Rule
11 9 of the OEB Rules of Practice and Procedure be served on the applicant and the
12 applicant's counsel as follows:

13 (a) The applicant: Matt Kirk
14 Senior Manager, Regulatory Affairs
15 Ontario Power Generation Inc.

16 Mailing address: H19
17 700 University Avenue
18 Toronto ON M5G 1X6

19 Telephone: 416-592-8541
20 Facsimile: 416-592-8519
21 Electronic mail: opgregaffairs@opg.com

22 (b) The applicant's Counsel: Charles Keizer
23 Torys LLP

24 Mailing address: 79 Wellington St. W.
25 PO Box 270
26 Toronto Dominion Centre
27 Toronto ON M5K 1N2

28 Telephone: 416-865-0040
29 Facsimile: 416-865-7380
30 Electronic mail: ckeizer@torys.com

1 (c) The applicant's Counsel: Aimee Collier
2 Assistant General Counsel
3 Ontario Power Generation Inc.

4 Mailing address: H19
5 700 University Avenue
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7 Telephone: 416-592-3019
8 Facsimile: 416-592-1466
9 Electronic mail: aimee.collier@opg.com

10 Dated at Toronto, Ontario, this 4th day of September, 2019.
11

12 Ontario Power Generation Inc.
13

14 [Original signed by]
15

16
17 _____
18 Matt Kirk
Senior Manager, Regulatory Affairs

1

APPROVALS

2 In this Application, OPG is seeking the following specific approvals:

- 3 1. Approval and implementation of the 2020 Hydroelectric Payment Amount effective
4 January 1, 2020, determined pursuant to the price-cap index mechanism approved by
5 the OEB in EB-2016-0152.
- 6 2. An order from the OEB declaring OPG's current payment amount for regulated
7 hydroelectric facilities interim as of January 1, 2020, if the order or orders approving
8 the payment amount are not implemented by January 1, 2020.

1 values for GDP-IPI (FDD) and Ontario AWE), less a productivity factor of
2 0% less a stretch factor of 0.3%.”³

3 The EB-2016-0152 Decision requires that the HPA for each year be determined using the price-
4 cap index proposed by OPG in EB-2016-0152 Ex. A1-3-2 (the “approved methodology”). The
5 EB-2016-0152 Decision established the formula to be applied to adjust rates annually, the base
6 payment amount to which the annual adjustment formula is to be applied, and the basis upon
7 which inputs to the annual adjustment formula are determined. The methodology approved by
8 the OEB is as follows⁴:

9
$$\text{Payment Amount}(t) = \text{Payment Amount}(t-1) \times \left(1 + \frac{\text{Inflation Factor}}{\text{Factor}} - \left(\frac{\text{Productivity Factor}}{\text{Factor}} + \frac{\text{Stretch Factor}}{\text{Factor}} \right) \right)$$

10 In its EB-2018-0243 Decision and Payment Amounts Order, issued December 13, 2018, the
11 OEB approved a 2019 hydroelectric payment amount of \$42.51/MWh⁵. The 2019 hydroelectric
12 payment amount was calculated in accordance with the approved methodology, using an
13 escalation factor of 1.1% (an inflation factor value of 1.4% less the approved X-factor value of
14 0.3%).

15 OPG has calculated the proposed 2020 HPA pursuant to the approved methodology.
16 Specifically:

17 1) **Prior Year’s Payment Amount:** The approved 2019 HPA is \$42.51/MWh as established
18 in the EB-2018-0243 Decision and Payment Amounts Order.

19 2) **Inflation Factor**

20 The composite inflation index approved by the OEB in EB-2016-0152 is determined using
21 the annual change in the following sub-indices (and respective weightings):⁶

22 i. GDP-IPI FDD from Statistics Canada applied to generation industry capital costs
23 (81%) and non-labour O&M costs (7%); and

³ *Ibid.*

⁴ EB-2016-0152 Decision, p. 121.

⁵ EB-2018-0243 Decision and Payment Amounts Order, p. 3.

⁶ EB-2016-0152 Decision, p. 122.

ii. Ontario AWE from Statistics Canada applied to generation industry labour costs (12%).

The resulting approved formula for determining the annual inflation factor is:

$$[(81\% + 7\%) \times \text{GDP-IPI FDD}] + [12\% \times \text{Ontario AWE}]$$

As the OEB is not expected to publish the Statistics Canada values to be used for setting 2020 rates until the fall of 2019, OPG has estimated the 2020 HPA using the 2017 and 2018 values for the indices published by Statistics Canada, and the OEB-approved weighting of the indices, resulting in an estimated inflation factor of 1.8%. OPG's calculations are set out in Chart 1, below.

Chart 1

Year	Inputs and Assumptions										Composite Index	
	Non-Labour GDP-IPI (FDD) - National							Labour AWE - All Employees - Ontario				Annual % Change
	Q1	Q2	Q3	Q4	Annual	Annual % Change	Weight	Annual	Annual % Change	Weight		
2017	108.0	108.5	108.3	109.0	108.5			975.8				
2018	109.4	109.9	110.6	111.1	110.3	1.6%	88%	1,001.2	2.6%	12%	1.8%	

3) X Factor (Productivity and Stretch Factors)

The OEB has approved a productivity factor of 0%⁷ and a stretch factor of 0.3%⁸ for the regulated hydroelectric facilities for the IR Term (2017-2021).

Based on the approved 2019 HPA, and using the inflation and X-factors summarized above, OPG estimates the 2020 HPA to be \$43.15/MWh. If the OEB's published index values include different annual percentage changes in either of the GDP-IPI FDD or the Ontario AWE, OPG will update this Application and the proposed 2020 HPA accordingly.

⁷ EB-2016-0152 Decision, p. 128.

⁸ EB-2016-0152 Decision, p. 129.

1 **4.0 IMPLEMENTATION**

- 2 OPG requests OEB approval of an effective date, and implementation date, of January 1, 2020
3 for the 2020 HPA.

CUSTOMER IMPACTS

1

2 1.0 PURPOSE

3 This evidence describes the impact of the proposed 2020 hydroelectric payment amount
4 (“HPA”) on a residential electricity customer consuming 700 kWh per month (the “typical
5 residential customer”) and typical large industrial customers and medium/large business
6 customers.

7 2.0 CUSTOMER IMPACTS

8 OPG has estimated the impact on customers in a manner that is consistent with previous OPG
9 proceedings, based on the incremental annual changes in OPG’s weighted average total
10 payments¹ that would result from the 2020 hydroelectric payment amount (Ex. I1-1-1) proposed
11 in this Application. The changes in the weighted average total payments are applied to the
12 typical residential customer’s usage of OPG generation, after adjusting for line losses and
13 accounting for OPG’s share of the province’s generation.²

14 Typical residential consumption is 737 kWh, based on the monthly consumption (700kWh) used
15 in the OEB “Bill Calculator” for estimating monthly electricity bills (using Time of Use pricing),
16 increased to include line losses at an assumed factor of 1.0525. OPG runs the “Bill Calculator”
17 on the OEB’s website at: [https://www.oeb.ca/consumer-protection/energy-contracts/bill-
18 calculator](https://www.oeb.ca/consumer-protection/energy-contracts/bill-calculator) for all local distribution companies available in the bill calculator and uses a simple
19 average of all of the bills as the typical bill. The typical residential customer bill based on
20 information updated as of June 2019 is \$109.07/month.

21 As described in Ex. I1-1-1, OPG has calculated the HPA to be \$43.15/MWh using an estimated
22 escalation of 1.5%, which reflects the approved X-factor value of 0.3% and an estimated inflation
23 factor value of 1.8% based on current Statistics Canada data tables for 2017 and 2018.
24 Consistent with the approach used to estimate customer bill impacts in EB-2016-0152³ and EB-

¹ As set out in the EB-2018-0243 Settlement Proposal, Attachment A, Table 5, line 11.

² Based on forecast demand for 2020 (136.6 TWh) from Table 3-1 of IESO Reliability Outlook Update from July 2019 to June 2024, released June 2019.

³ EB-2016-0152 PAO, Appendix B, Table 1, Notes 1 and 2.

1 2018-0243⁴, OPG has applied this 1.5% estimated escalation factor to calculate an updated
2 illustrative HPA for 2021, as a proxy for price-cap escalation in future years.⁵

3 As shown in Table 1, OPG estimates the average incremental impact of the proposed 2020
4 HPA on a typical residential customer's monthly bill to be \$0.03, or 0.03%, per year over the
5 2020-2021 period. This increase is attributable to the difference between the higher price-cap
6 index value of 1.5% for the 2020 HPA and the illustrative HPA for 2021, and the 1.1% value
7 used in EB-2018-0243.

8 Using the same approach as in EB-2016-0152⁶ and EB-2018-0243⁷, the estimated customer
9 bill impacts of the 2020 HPA for medium/large businesses and large industrial customers in the
10 Alectra (PowerStream), Hydro One Networks Inc. and Toronto Hydro-Electric System Limited
11 service areas for the January 1, 2020 to December 31, 2021 period are provided in Ex. I1-1-2,
12 Tables 2b, 2c and 2d.⁸

⁴ EB-2018-0243 Decision and Payment Amounts Order (December 13, 2018), Page 2.

⁵ As noted in Ex. I1-1-1, OPG will update the Application to reflect index values for 2020 rates applications, typically published by the OEB in the fall of the preceding year, if they differ from the annual sub-index changes used by OPG in Ex. I1-1-1. If such an update is required, OPG will similarly update the illustrative HPA for 2021 used to calculate customer bill impacts resulting from the proposals in this Application.

⁶ EB-2016-0152 PAO, Appendix I.

⁷ EB-2018-0243 Settlement Proposal, Attachment A.

⁸ These are the same service areas presented for such customers in EB-2016-0152 and EB-2018-0243.

Numbers may not add due to rounding.

Filed: 2019-09-04
 EB-2019-0209
 Exhibit I
 Tab 1
 Schedule 2
 Table 1

Table 1
Annualized Residential Customer Impact

Line No.	Description	Note	2019 (a)	2020 (b)	2021 (c)	Average (d)
1	Typical Consumption (kWh/Month)	1	737	737	737	
2	Typical Usage of OPG Generation (kWh/Month) (line 1 x line 10)		388	379	369	
3	Typical Bill (\$/Month)	1	109.07	109.07	109.07	
4	Incremental Bill Impact (\$/month) (line 2 x line 7 / 1000)		0.00	0.03	0.03	0.03
5	Incremental Bill Impact (%) (line 4 / line 3)		0.0%	0.0%	0.0%	0.03%
6	Incremental Weighted Average Total Payments (\$/MWh)	2	-	0.08	0.17	
7	Year-Over-Year Change in Incremental Weighted Average Total Payments (\$/MWh)		-	0.08	0.09	
8	Total OPG Regulated Production (TWh)	3	72.0	70.3	68.4	
9	Forecast of 2020 Provincial Demand (TWh)	4	136.6	136.6	136.6	
10	OPG Proportion of Customer Usage (line 8 / line 9)		52.7%	51.5%	50.0%	

Notes:

- 1 Typical monthly consumption (700 kWh) and typical monthly bill are based on the OEB "Bill Calculator" for estimating monthly electricity bills (using Time of Use pricing), available at: <https://www.oeb.ca/consumer-protection/energy-contracts/bill-calculator> - accessed in June 2019
 Typical Consumption includes line losses (Assumed loss factor of 1.052).
- 2 Per App. A, Table 3, line 13.
- 3 Per App. A, Table 3, line 5 plus line 10.
- 4 Based on forecast demand for 2020 (136.6 TWh) from Table 3-1 of IESO Reliability Outlook Update from July 2019 to June 2024, released June 2019.

Numbers may not add due to rounding.

Filed: 2019-09-04
 EB-2019-0209
 Exhibit I
 Tab 1
 Schedule 2
 Table 2a

Table 2a
Annualized Bill Impact for Typical Alectra (PowerStream) Customers

Line No.	Description	Note	2019		2020		2021	
			Medium/Large Business	Large Industrial	Medium/Large Business	Large Industrial	Medium/Large Business	Large Industrial
			(a)	(b)	(c)	(d)	(e)	(f)
1	Typical Customer Usage (kWh/Month)	1	82,760	2,896,600	82,760	2,896,600	82,760	2,896,600
2	Total Forecast Production (TWh)	2	72.0	72.0	70.3	70.3	68.4	68.4
3	OPG Portion of Customer Usage	3	52.7%	52.7%	51.5%	51.5%	50.0%	50.0%
4	Customer Usage of OPG Generation (kWh/Month) (line 1 x line 3)		43,623	1,526,809	42,611	1,491,380	41,416	1,449,569
5	Typical Monthly Customer Bill (\$)	1	14,157	467,845	14,157	467,845	14,157	467,845
6	Year-Over-Year Change in Incremental Weighted Average Total Payments (\$/MWh)	4	0.00	0.00	0.08	0.08	0.09	0.09
7	Percentage Increase in Customer Bills (line 6 x (line 4/1000) / line 5)		0.00%	0.00%	0.02%	0.03%	0.03%	0.03%
8	Dollar Increase in Customers Bills (\$) (line 5 x line 7)		0.00	0.00	3.35	117.19	3.65	127.90

Notes:

- 1 Current Approved Rates and Usage (adjusted for line losses) are taken from the Powerstream EB-2015-0003 Draft Rate Order.
 Medium/Large Business (EB-2015-0003 Draft Rate Order, Schedule B, Page 4): GS > 50 customer, consumption 80,000 kWh, loss factor 3.45%.
 Large Industrial (EB-2015-0003 Draft Rate Order, Schedule B, Page 5): Large User customer, consumption 2,800,000 kWh, loss factor 3.45%.
- 2 Per App. A, Table 3, line 5 plus line 10.
- 3 Per App. A, Table 1, line 10.
- 4 Per App. A, Table 1, line 7.

Numbers may not add due to rounding.

Filed: 2019-09-04
 EB-2019-0209
 Exhibit I
 Tab 1
 Schedule 2
 Table 2b

Table 2b
 Annualized Bill Impact for Typical Hydro One Networks Customers

Line No.	Description	Note	2019		2020		2021	
			Medium/Large Business	Large Industrial	Medium/Large Business	Large Industrial	Medium/Large Business	Large Industrial
			(a)	(b)	(c)	(d)	(e)	(f)
1	Typical Customer Usage (kWh/Month)	1	37,135	517,000	37,135	517,000	37,135	517,000
2	Total Forecast Production (TWh)	2	72.0	72.0	70.3	70.3	68.4	68.4
3	OPG Portion of Customer Usage	3	52.7%	52.7%	51.5%	51.5%	50.0%	50.0%
4	Customer Usage of OPG Generation (kWh/Month) (line 1 x line 3)		19,574	272,513	19,120	266,189	18,584	258,726
5	Typical Monthly Customer Bill (\$)	1	7,556	77,516	7,556	77,516	7,556	77,516
6	Year-Over-Year Change in Incremental Weighted Average Total Payments (\$/MWh)	4	0.00	0.00	0.08	0.08	0.09	0.09
7	Percentage Increase in Customer Bills (line 6 x (line 4/1000) / line 5)		0.00%	0.00%	0.02%	0.03%	0.02%	0.03%
8	Dollar Increase in Customers Bills (\$) (line 5 x line 7)		0.00	0.00	1.50	20.92	1.64	22.83

Notes:

- 1 Current Approved Rates and Usage (adjusted for line losses) are based on 2017 bill impacts per Hydro One's EB-2016-0081 Draft Rate Order. Medium/Large Business (EB-2016-0081 Draft Rate Order, Exhibit 6.0): GSd customer, consumption 35,000 kWh, loss factor 6.1%. Large Industrial (EB-2016-0081 Draft Rate Order, Exhibit 6.0): ST customer, consumption 500,000 kWh, loss factor 3.4%.
- 2 Per App. A, Table 3, line 5 plus line 10.
- 3 Per App. A, Table 1, line 10.
- 4 Per App. A, Table 1, line 7.

Numbers may not add due to rounding.

Filed: 2019-09-04
 EB-2019-0209
 Exhibit I
 Tab 1
 Schedule 2
 Table 2c

Table 2c
Annualized Bill Impact for Typical Toronto Hydro Customers

Line No.	Description	Note	2019		2020		2021	
			Medium/Large Business	Large Industrial	Medium/Large Business	Large Industrial	Medium/Large Business	Large Industrial
			(a)	(b)	(c)	(d)	(e)	(f)
1	Typical Customer Usage (kWh/Month)	1	155,640	4,584,150	155,640	4,584,150	155,640	4,584,150
2	Total Forecast Production (TWh)	2	72.0	72.0	70.3	70.3	68.4	68.4
3	OPG Portion of Customer Usage	3	52.7%	52.7%	51.5%	51.5%	50.0%	50.0%
4	Customer Usage of OPG Generation (kWh/Month) (line 1 x line 3)		82,038	2,416,324	80,135	2,360,253	77,888	2,294,083
5	Typical Monthly Customer Bill (\$)	1	27,003	771,057	27,003	771,057	27,003	771,057
6	Year-Over-Year Change in Incremental Weighted Average Total Payments (\$/MWh)	4	0.00	0.00	0.08	0.08	0.09	0.09
7	Percentage Increase in Customer Bills (line 6 x (line 4/1000) / line 5)		0.00%	0.00%	0.02%	0.02%	0.03%	0.03%
8	Dollar Increase in Customer Bills (\$) (line 5 x line 7)		0.00	0.00	6.30	185.46	6.87	202.41

Notes:

- 1 Current Approved Rates and Usage (adjusted for line losses) are taken from the THESL EB-2014-0116 Draft Rate Order
 Medium/Large Business (EB-2014-0116 Draft Rate Order, Schedule 9, Page 7): GS 50-999 customer, consumption 150,000 kWh, loss factor 3.76%
 Large Industrial (EB-2014-0116 Draft Rate Order, Schedule 9, Page 9): Large Use customer, consumption 4,500,000 kWh, loss factor 1.87%
- 2 Per App. A, Table 3, line 5 plus line 10.
- 3 Per App. A, Table 1, line 10.
- 4 Per App. A, Table 1, line 7.

Numbers may not add due to rounding.

Filed: 2019-09-04
 EB-2019-0209
 Exhibit I
 Tab 1
 Schedule 2
 Table 3

Table 3
Computation of OPG Weighted Average Payment Amount and Total Payments

Line No.	Description	Note	2019 (a)	2020 (b)	2021 (c)
1	Hydroelectric Payment Amount (\$/MWh)	1	42.51	43.15	43.79
2	Hydroelectric Payment Rider A (\$/MWh)	2	1.44	1.01	0.00
3	Hydroelectric Payment Rider B (\$/MWh) (Hydroelectric Interim Period Shortfall Recovery Rider)	3	0.35	0.24	0.00
4	Hydroelectric Payment Rider C (\$/MWh)	4	1.16	1.25	2.05
5	Hydroelectric Production Forecast (TWh)	5	33.0	33.0	33.0
6	Nuclear Payment Amount (NPA) (\$/MWh)	6	77.00	85.00	89.70
7	Nuclear Payment Rider A (NPR) (\$/MWh)	7	2.79	2.04	0.00
8	Nuclear Payment Rider B (\$/MWh) (Nuclear Interim Period Shortfall Recovery Rider)	8	7.71	5.64	0.00
9	Nuclear Payment Rider C (\$/MWh)	9	2.20	2.28	6.13
10	Nuclear Production Forecast (TWh)	10	39.0	37.4	35.4
11	Weighted Average Total Payments (\$/MWh) ((Sum lines 1 to 4) x line 5) + (Sum lines 6 to 9) x line 10) / (line 5 + line 10)		69.44	71.84	71.72
12	EB-2018-0243 Weighted Average Total Payments (\$/MWh)	11	69.44	71.76	71.55
13	Incremental Weighted Average Total Payments (\$/MWh) (line 11 - line 12)		0.00	0.08	0.17
14	Percentage Change in Weighted Average Payment Amount (Year over Year)	12	8.2%	3.5%	-0.2%

Notes

- 1 Col. (a) is the OEB approved 2019 hydroelectric payment amount per EB-2018-0243 Decision and Payment Amounts Order dated December 13, 2018.
 Col. (b) is the 2020 hydroelectric payment amount proposed in this application.
 Col. (c) is an illustrative hydroelectric payment amounts calculated using an annual adjustment to the hydroelectric rate of 1.5%.
- 2 OEB-approved hydroelectric riders per EB-2016-0152 PAO App. D, Table 1, line 14.
- 3 Regulated Hydroelectric interim period shortfall recovery rider per EB-2016-0152 PAO App. F, Table 1, lines 17 to 19.
- 4 OEB-approved hydroelectric riders per EB-2018-0243 Settlement Proposal, Attachment A, Table 5, line 4.
- 5 Regulated Hydroelectric production is the 2014 and 2015 average OEB approved hydroelectric production per EB-2013-0321 Decision and Order P. 9, and EB-2016-0152 PAO, App. I, Table 2, line 3.
- 6 OEB-approved nuclear payment amounts per EB-2016-0152 PAO, App. C, Table 1.
- 7 OEB-approved nuclear riders per EB-2016-0152 PAO App. E, Table 1, line 18.
- 8 Nuclear interim period shortfall recovery rider per EB-2016-0152 PAO App. F, Table 2, lines 12 to 14.
- 9 OEB-approved nuclear riders per EB-2018-0243 Settlement Proposal, Attachment A, Table 5, line 9.
- 10 OEB-approved nuclear production amounts per EB-2016-0152 PAO App. C, Table 1, line 2.
- 11 Per EB-2018-0243 Settlement Proposal, Attachment A, Table 5, line 11.
- 12 Col. (a) per EB-2018-0243 Settlement Proposal, Attachment A, Table 5, line 12, col. (b).