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Darlington Refurbishment Program Annual Report

2025 REPORT

AS PER DECISION AND ORDER IN EB-2020-0290

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December 29, 2025

DARLINGTON REFURBISHMENT PROGRAM**INTRODUCTION**

This report provides the status of the Darlington Refurbishment Program, hereafter referred to as the “Program.”

Unless otherwise noted, this report includes a summary and a review of the Program performance through September 30, 2025.

This is an annual report to be provided by Ontario Power Generation (OPG) to the Ontario Energy Board (OEB) pursuant to the OEB’s decision and order in EB-2020-0290.¹

EXECUTIVE SUMMARY

The Program is a multi-year, multi-phase, mega-project that will enable the Darlington Nuclear Generating Station (Darlington) to continue safe and reliable operation until 2055. The Program 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 Release Quality Estimate (RQE) for the four-unit refurbishment is \$12.8 Billion. Under the RQE, the refurbishment of the first unit (Unit 2) was to start in October of 2016 and be returned-to-service in the first quarter of 2020, with the last unit (Unit 4) scheduled to be completed in 2026. The RQE formed the basis of OPG’s May 2016 pre-filed evidence in EB-2016-0152. After the development of the RQE, OPG continued detailed planning and preparations and further refined its Unit and Program estimates through the Unit 2 Execution Estimate (U2EE) in August 2016, Unit 3 Execution Estimate (U3EE) in August 2020, Unit 1 Execution Estimate (U1EE) in November 2021 and Unit 4 Execution Estimate (U4EE) in March 2023. All of these maintained the Program estimate, exclusive of external events such as the COVID-19 pandemic, within the original \$12.8 Billion RQE budget and continued to forecast completion of the four-unit refurbishment in 2026. The U3EE formed the basis of OPG’s December 2020 pre-filed evidence in EB-2020-0290.¹ OPG measures its performance over the refurbishment of each Unit against each Unit’s execution estimate.

As of September 30th, 2025, the cost forecast for the overall DRP is projected to complete at \$100M below the established Program budget of \$12.8 Billion. 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 swan COVID-19 pandemic.

Unit 2 was successfully returned to service on June 4, 2020. Completion of the Unit 2 refurbishment on budget and with a small schedule variance of just over three months, represented a significant achievement in mega-project execution for OPG. Unit 3 was successfully reconnected to the grid on July 18, 2023, with good quality and safety, within the U4EE approved budget of \$2,491 million, and 167 days ahead of public

¹ EB-2020-0290, Decision and Order, dated November 15, 2021, Schedule A (OEB Approved Settlement Proposal), Appendix A, p. 1.

commitment date, which represented another significant milestone for the Program. Both Unit 2 and Unit 3 have been operating at 100 percent full power.

The U1EE was approved by OPG's Board of Directors in November 2021 in advance of the start of the refurbishment outage on Unit 1, and incorporated additional lessons learned, and strategic improvements based on the Unit 2 and Unit 3 refurbishments. Per the final U1EE, the budget and High Confidence Schedule to complete Unit 1 were \$1,984 Million and 38 months, respectively.

Unit 1 was successfully reconnected to the grid on November 27, 2024, with good quality and safety, within the approved budget, and 142 days ahead of public commitment schedule. Overall, the return to service of Unit 1 represented another significant milestone for the Program with performance improvements exceeding the planned unit over unit efficiencies. Unit 1 is operating at 100 percent full power.

Unit 4 is the last of four units undergoing refurbishment. The final U4EE was approved by OPG's Board of Directors in March 2023. Per the final U4EE, the budget and High Confidence Schedule to complete Unit 4 are \$2,128 Million and 37 months, respectively.

Unit 4 execution commenced on July 19, 2023, shortly after the return to service of Unit 3. Based on Independent Electricity System Operator (IESO) grid stability constraints, the approval for the outage was delayed 17 days. As of September 30, 2025, Unit 4 refurbishment activities were progressing on schedule and in the fourth and final major segment, Power Up & Lead-Out, which involves restoration of the Vault, receiving approval from the CNSC to proceed with increasing reactor power above 35% of full power and returning the unit to commercial service. Unit 4 is on track to be returned to service by the first half of 2026.

DARLINGTON REFURBISHMENT PROGRAM STATUS

OVERVIEW

Key Program highlights include:

- **SAFETY:** Safety performance continues to be better than the average construction industry performance in Ontario. The Program is approaching 63 million hours worked with only one Lost Time Injury² (in May 2019) since the start of the Program. Programmatically, OPG has implemented the Fail-Safe methodology that attempts to build capacity by adding defenses in a layered approach with the mindset to reduce risk and chance of injury to the worker.
- **QUALITY:** The quality management program is used to identify issues during refurbishment execution by focused surveillance of vendor-performed work. Quality of work to date has surpassed nuclear standards, and in most cases is industry leading. There were four Significant Quality Events (SQEs) for Unit 1 and, to date, two for Unit 4. All identified SQEs were promptly addressed with corrective actions implemented and verified, and lessons learned have been integrated into the ongoing quality program.
- **SCHEDULE:** Unit 4 execution began on July 19, 2023, and was progressing on plan through Retube Tooling Platforms Removals & Bridge Replacement as of September 30, 2025. Unit 4 is expected to return to service by April 2026.
- **COST:** The cost forecast at completion for the overall DRP is \$100M below the established Program budget of \$12.8 Billion including COVID-19 impacts. Life-to-date expenditures as of September 30, 2025 are \$1,686 million for Unit 4.

PROGRESS

Unit 1 was successfully reconnected to the grid on November 27, 2024. The following major accomplishments occurred within the period:

- RCHP 6 RCHP 6 (RHP3) Reactor Power >1% Operation on October 10, 2024.
- RCHP 8 (RHP4) Reactor Power >35% Operation on November 15, 2024.
- RCHP 9 Unit Available for Commercial Operation on November 27, 2024.

As of September 30, 2025, the refurbishment of Unit 4 is 93% complete; some of the major accomplishments within the period are as follows:

- Segment 3 Lower Feed Installation Series on August 20, 2025.
- RCHP 1 Moderator Fill on May 9, 2025.
- RCHP 2 Fuel Load on August 28, 2025.

² A Lost Time Injury is a work injury that results in lost days (minimum of one) beyond the date of injury as a direct result of a safety incident.

ANNUAL INTEGRATED IMPLEMENTATION PLAN (IIP) COMMITMENT

- Overall, 94% (584 of 622) of IIP commitments have been completed to date. Additionally, all IIPs associated with the Unit 4 Return to Service are on track to be completed in 2025.
- For Darlington - Periodic Safety Review (D-PSR) IIPs, overall, 12 out of 17 D-PSR IIP tasks have been completed. There are four tasks remaining to be completed for 2025.

SAFETY

Safety is a top priority for OPG. OPG has one of the lowest injury rates in the Canadian electricity sector³. In order to maintain this safety performance, OPG continues to set challenging targets for its day-to-day operations. At the end of the third quarter of 2025, the Program reported a Total Recordable Injury Frequency (TRIF) of 0.06 against its internal target of 0.40, reflecting two medically treated injuries from Q3 2024 to Q3 2025. OPG sets very challenging targets for all aspects of its operations and the Program. This expectation has resulted in a program safety performance that is significantly better than the overall construction industry average as illustrated in Table 1.

The Program is approaching over 63 million hours worked with one Lost Time Injury, which occurred in May 2019. There have been no Lost Time Injuries since then.

OPG employs a variety of leading indicators to ensure that issues are addressed before incidents occur. OPG proactively tracks all events/issues and has adopted the Safety Classification and Learning (SCL) model. The SCL model is focused on learning from events to prevent recurrence and keep workers safe, which aligns with OPG's Fail-Safe strategy. OPG carefully logs and reviews each of these incidents and implements corrective actions to reduce the likelihood of future incidents. In addition, the Safe Work Planning Assessment (SWPA) has been implemented to assess the quality of direct controls implemented to address high-energy hazards within safe work plans.

PERFORMANCE METRICS SUMMARY

Table 1 provides a summary of the Program's Safety Performance and includes OPG and Vendor workers.

Safety Performance Metrics													
Category	Measure	OPG Target	Historical Actuals									Actual	IHSA ³
			2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 (Q3) YTD ²	Ontario Construction Industry 2024 ³
Safety	TRIF (Total Recordable Injury Frequency) ¹	0.4	0.64	0.49	0.39	0.52	0.35	0.25	0.26	0.19	0.14	0.06	3.83
	Lost Time Injuries	0	0	0	0	1	0	0	0	0	0	0	N/A

Notes:

³ Compared to the Infrastructure Health and Safety Association injury rate.

1. TRIF is the average number of fatalities, Lost Time Injuries, medical treatment injuries and restricted work injuries per 200,000 hours worked.
2. Year-to-Date (YTD).
3. 2024 IHSA rating is the most current safety rating for the Ontario Construction Industry.

SAFETY CAMPAIGNS, PROGRAMS, AND INITIATIVES

OPG's safety performance is underpinned by the practice of monitoring low level precursor issues and proactively taking action to reduce the likelihood of serious events occurring. The following are the key safety campaigns, programs, and initiatives that OPG and its vendor partners advanced in 2025:

- **A Fail-Safe Approach to Safety and Human Performance**

This ongoing initiative emphasizes safe work planning, event learning, recognition for safety-related improvements and the presence of defenses. Fail-Safe aligns with OPG's strategic direction to proactively approach safety and human performance. For 2025, the focus has continued to have Fail-Safe concepts in Safe Work Plans (SWP) and Pre-Job Briefs (PJB) with the use of defenses/direct controls, and hazard recognition to build capacity. The generation of progressive metrics to capture the presence of Fail-Safe defenses is ongoing.

The Edison Electrical Institute (EEI) Safety Classification and Learning (SCL) Model was implemented in Q1 2025. The SCL model has allowed OPG to take its safety performance to the next level by vastly increasing the number of learning opportunities and to better characterize our safety performance. The model supports critical reflection and allows for improved learning from event trend analysis by categorizing outcomes. The SCL model is focused on learning from events to prevent recurrence and keep workers safe, which aligns with OPG's Fail Safe strategy.

- **Dynamic Learning Activities**

The Health & Safety team implemented a dynamic and innovative approach to provide unique learning opportunities and reinforce a safety conscious mindset among field workers. Each quarter, a number of focus area topics were rolled out, with workers participating in learning activities to bring recognition to common high energy hazards. Focus topics included Material Movement, Hazard Identification, Heat Stress, Utilization of the SCL Energy Wheel and Demobilization.

- **Vendor Alignment Meetings**

The Program scheduled bi-monthly meetings with Vendor Health & Safety partners. The meetings between Vendors and OPG serve as an important platform for operating experience exchange, and to address upcoming challenges, share insights and align key safety priorities. They provide an opportunity to discuss ongoing and emerging safety initiatives, as well review new and upcoming safety innovations that support continuous improvement.

- **Heat Stress Monitors**

The practice for monitoring heat stress hazard related parameters previously required sending workers to the work area using a handheld Wet Bulb Globe Temperature (WBGT) device to gather temperature and humidity data, as part of work preparation. The data was not live and work rest time ratios had to be calculated manually by the supervisors. OPG has now implemented an improved process by installing new remote WIFI based WBGT sensors in high-risk locations. A webpage/dashboard was also deployed that not only displays the live temperature and humidity readings but can also automatically calculate and produce work-rest regimens based on this data. This approach has made the work preparation process more efficient and safer from both industrial and radiological safety perspectives.

- **Hazmat App**

This solution enhances both safety and efficiency while improving the management of hazardous material storage cabinets on site. The App simplifies the process of completing cabinet inspections through an inspections questionnaire and an ability to update inventories by scanning a unique QR

code placed on each cabinet. It provides clear inspection criteria and guidance, improving tracking, record-keeping, and oversight. The App also has tracking capability which allows more efficient oversight on the 100+ chemical storage cabinets on site, such as monitoring for any past due inspection dates and providing timely identification of performance trends.

- **Trending, Prevention and Intervention (TPI) Program**

The Program has adopted the TPI program to identify, detect and correct issues pertaining to the industrial safety functional area. TPI enables the site to take action by reviewing trends and putting in place the necessary actions. In addition, the program functions as a proactive mechanism to highlight both high and low energy hazards and to implement safety initiatives aimed at preventing potential safety events during critical project evolutions.

RADIOLOGICAL SAFETY

OPG’s Radiological Protection (RP) program continues to meet regulatory requirements and industry standards. All workers are in compliance within regulatory dose limits. This performance is a result of OPG’s robust nuclear safety culture and OPG’s “As Low as Reasonably Achievable” (ALARA) radiological safety principles. Lessons learned on Unit 2, Unit 3 and Unit 1 have been incorporated into training and enhanced radiological safety measures on Unit 4. The Program’s ALARA committee continues to monitor and challenge RP performance to ensure ALARA principles result in lower doses to workers.

There were no unplanned radiological exposures in 2025.

PERFORMANCE METRICS SUMMARY

Table 2 provides a summary of the Program’s radiological safety performance and includes both OPG and vendor employees.

Table 2 - Radiological Safety Performance Metrics								
	2022 Year End		2023 Year End		2024 Year End		2025 End of Q3	
	Actual	Target	Actual	Target	Actual	Target	Actual	Target
Unit 1 CRE (person-rem)¹	722	984	416	435	139	242	N/A	N/A
Unit 4 CRE (person-rem)¹	N/A	N/A	114	120	1064	1460	270	380
Unplanned Exposures	0	0	0	0	1	0	0	0

Note:

1. Collective Radiation Exposure (CRE). A lower number represents a lower amount of radiological exposure.

QUALITY

Refurbishment of a Darlington unit involves many thousands of removal and installation activities, which are required to be executed with a high degree of precision. Many of the installation activities involve precision fit-up tasks and highly technical welding operations that are critical. A certain amount of rework is to be expected on a program of this nature.

The quality management program is used to identify issues during refurbishment execution by focused oversight on vendor performed work. There were four SQEs for Unit 1 related to under roll channels, Main Boiler Feed Pumps, a disconnected Generator Grounding Cable and a Fire-Resistant Fluid leak. Additionally, as of September 30, 2025, there was two SQEs for Unit 4 related to incorrect Retube and Feeder Platform movement and an incorrect Generator Casing penetration.

OPG Quality Management organization ensures effective oversight of vendor quality assurance programs during refurbishment, which enabled the prompt identification and resolution of the above issues. This approach led to timely corrective actions, process improvements, and strengthened collaboration with vendors to prevent recurrence.

Continuous improvement is embedded in OPG's approach to project execution, with lessons learned and Kaizen/Six Sigma practices driving enhancements in industrial and radiological safety, tooling, schedule management, organizational alignment, and Foreign Material Exclusion (FME) planning and oversight. The Program's culture of continuous improvement has delivered significant benefits, particularly in Unit 4, where lessons learned have been effectively integrated to drive performance gains. Window Specific Lessons Learned Workshops have played a key role in capturing and sharing valuable insights and best practices across the team.

Notably, the quality of welding activities has seen considerable improvement, with the Unit 4 Feeder program achieving an industry-leading weld failure rate of just 1.5%. This surpasses Unit 1's rate of 1.74% and Unit 3's rate of 4.28%, setting a new benchmark for quality and performance in the industry.

SCHEDULE

OPG measures Program progress against two schedules:

1. A longer High Confidence Schedule
2. A shorter Working Schedule

The difference between these two schedules is that the High Confidence Schedule includes additional contingency amounts quantified based on detailed risk analysis. These contingency amounts are expected to be utilized over the course of the Program. The Working Schedule is used to calculate performance metrics, for example, the Schedule Performance Index (SPI), and manage day-to-day activities, allowing for early escalation of issues⁴. The use of both a Working Schedule and High Confidence Schedule is an industry leading best practice for large and complex projects.

Based on the strong performance and completion of Unit 3, OPG had advanced its High Confidence Schedule for Units 1 and 4 as part of the U1EE and U4EE forecasts. Given inherent schedule risks that remained from factors such as the ongoing execution of the units in an overlapped manner (Units 1 and 4), OPG continued to maintain its previous public commitment durations for each unit.

PERFORMANCE METRICS SUMMARY

Table 3A provides a summary of the Unit 1 schedule performance relative to the U1EE Working Schedule and High Confidence Schedule.

⁴ This strategy provides an early indication of potential risks or issues and allows OPG to proactively manage Program performance.

Table 3A – Unit 1 Schedule Performance Metrics		
Measure	2024 Year End Actual	Working Schedule Target
Days Ahead of / Behind High Confidence Schedule ¹	142 days Ahead	N/A
Critical Path Days Ahead of / Behind Working Schedule ²	45 Days Behind At Completion of High-Power Testing & Turbine Testing (W096) ATC (Approach To Critical) (W092)	14-Oct-2024
SPI ³ (Schedule Performance Index)	1.00	1.00
Working Schedule Completion Date ²	27-Nov-2024	N/A

Notes:

1. Days Ahead/Behind is calculated as progress for all work currently completed relative to the Life to Date (LTD) allotment of Contingency Days available in the High Confidence Schedule.
2. Critical Path Days Ahead/Behind and Forecast Working Schedule Completion Date are calculated as progress for all work currently completed relative to the Working Schedule and do not consider projected gains or losses for future work.
3. SPI is calculated for construction, commissioning, and inspection work packages only against the Working Schedule and SPI calculation includes both critical path and the non-critical path works.

Table 3B provides a summary of the Unit 4 schedule performance relative to the U4EE Working Schedule and High Confidence Schedule.

Table 3B – Unit 4 Schedule Performance Metrics			
Measure	2024 Year End Actual	2025 Q3 Actual	Working Schedule Target
Days Ahead of / Behind High Confidence Schedule LTD ¹	19 Days Behind	55 Days Ahead	N/A
Critical Path Days Ahead of / Behind Working Schedule LTD ²	50 Days Behind (At Bellows Inspection W072)	2 Days Ahead at completion of Fuel Load, Lower Body Tubing, LBS Cabinet Frame Tie-in (W084, W235, W233)	15-Feb-2026
SPI ³ (Schedule Performance Index)	1.04	0.99	1.00
Forecast Working Schedule Completion Date ²	13-Feb-2026	07-Mar-2026	N/A

Notes:

1. Days Ahead/Behind is calculated as progress for all work currently completed relative to the LTD allotment of Contingency Days available in the High Confidence Schedule.
2. Critical Path Days Ahead/Behind and Forecast Working Schedule Completion Date are calculated as progress for all work currently completed relative to the Working Schedule and do not consider projected gains or losses for future work.
3. SPI is calculated for construction, commissioning, and inspection work packages only against the Working Schedule and SPI calculation includes both critical path and the non-critical path works.

COST

Detailed planning associated with the final U4EE confirmed that the overall Program cost and associated contingencies were within the \$12.8 Billion set at RQE.

Total Program expenditures to date are \$12.0 Billion, with the current remaining estimate to complete the Program at \$0.7 Billion. The overall program estimates at completion is projected to complete at \$12.7B which is \$100M below the established Program budget of \$12.8 Billion. 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 COVID-19 pandemic.

Table 4 provides a summary of the cost performance metrics for Unit 1 and Unit 4.

Table 4 – Cost Performance Metrics Unit 1 & Unit 4¹ (Millions)				
Unit	CPI (Q3 2025)	LTD Q3 2025 Actual Cost	Current Estimate to Complete	Current Estimate at Completion
Unit 1	1.00	\$1,784	\$3	\$1,787
Unit 4	0.96	\$1,686	\$774	\$2,360

Notes:

1. Program expenditures include capital and OM&A consistent with OEB-approved amounts, as well as the impacts of COVID-19 as applicable.

Table 5 provides a summary of the Total Program Actual Cost Incurred vs. Forecast Cumulative Capital Costs for all Units (including the impacts of COVID-19).

Table 5 – Total Program Actual vs. Forecast Cumulative Costs EB-2020-0290 (Millions)		
	Forecast Cumulative Costs¹	Actual Cost Incurred²
Q1 2021	7,746	7,739
Q2 2021	8,048	7,967
Q3 2021	8,324	8,187
Q4 2021	8,575	8,403
Q1 2022	8,849	8,634
Q2 2022	9,153	8,877
Q3 2022	9,438	9,125
Q4 2022	9,735	9,393
Q1 2023	10,050	9,637
Q2 2023	10,327	9,910
Q3 2023	10,576	10,140
Q4 2023	10,836	10,399
Q1 2024	11,101	10,650
Q2 2024	11,380	10,927
Q3 2024	11,617	11,210
Q4 2024	11,829	11,455
Q1 2025	11,982	11,687
Q2 2025	12,126	11,868
Q3 2025	12,283	12,020
Q4 2025	12,439	
Q1 2026	12,577	
Q2 2026	12,662	

Q3 2026	12,723	
Q4 2026	12,800	

Notes:

1. Total Program forecast cumulative costs (inclusive of capital and OM&A costs) are per the EB-2020-0290, Ex. L-D2-02-Environmental Defence-005, Chart 1 and exclude COVID-19 impacts. The expenditures are based on the U3EE, which did not separate between capital and OM&A costs. As stated in the interrogatory response, as OPG executes the remaining work, and implements further Lessons Learned and Strategic Initiatives, the forecast quarterly expenditure profile may change. OPG will continue to report on this basis for ease of comparability.
2. Actuals are based on life-to-date total Program spend, inclusive of capital and OM&A costs, and include COVID-19 impacts to date.

ENGINEERING

The strategy for Design Engineering was to replicate the Engineering Changes (ECs) from Unit 2 and Unit 3 for Units 1 and 4 and modify them based on lessons learned. Unit 1 and Unit 4 EC replication has been completed.

Major engineering accomplishments for the period include:

- Completed Unit 1 EC closeout.
- Completed Unit 4 Return to Service activities such as Moderator Fill and Fuel Load.
- Completed Calandria Vessel Ensure Clean, Primary Heat Transport Ensure Clean and Generator Ensure Clean Challenge meetings. Steam Generator Ensure Clean is in progress; all inspections prior to heat up have been completed and inspections post heat up are planned.
- Completed Unit 4 construction completion declarations for Turbine Generator (TG) and major modifications such as Fuel Channels, Feeders, Feeder Instrumentation, Auxiliary Shutdown Cooling, Emergency Heat Sink and Liquid Relief Valve Replacements. EC Available for Service (AFS) for these modifications will be completed as the system configuration allows in Q4 2025.

PROCUREMENT

PROCUREMENT STATUS FOR UNIT 4

All materials necessary for Unit 4 Return to Service have been procured. As of September 30, 2025, 99.2% of purchase orders were issued and 98.6% of materials for Unit 4 have been delivered to site, with remaining materials on track for the planned need date.

CONSTRUCTION

CONSTRUCTION PROGRESS SUMMARY

As of September 30, 2025, the execution of Unit 1 is 100% complete overall. Unit 1 was successfully reconnected to the grid on November 27, 2024. The following major accomplishments occurred within the period:

- Low Power testing completed October 10, 2024.
- U1 Turbine Generator Dynamic Commissioning completed on November 26, 2024.
- First Synchronization and Run-up completed November 15, 2024.
- Return to service completed on November 27, 2024.

As of September 30, 2025, the refurbishment of Unit 4 is 93% complete overall and non-critical path, or bulk work, activities are 93% complete. The following major accomplishments occurred within the period:

- Calandria Tube, Fuel Channel, Lower Feeder, and Lower Body Support Installation were completed on August 20, 2025, which marked the completion of the installation phase for Unit 4.

LABOUR RELATIONS ISSUES SUMMARY

The Power Workers' Union (PWU) and OPG entered into three-year agreement from April 1, 2024, to March 31, 2027. The current two-year collective agreement between the Society and OPG expires on December 31, 2025. The collective bargaining process for a new renewal collective agreement began in September 2025 and is ongoing.

Construction work in Ontario is performed through craft unions with established bargaining rights at OPG facilities. These bargaining rights are established either through the Electrical Power Systems Construction Association (EPSCA)³ or with OPG. The associated collective agreements are negotiated either directly between the parties or through the EPSCA, as applicable. Negotiations for the renewal of all EPSCA collective agreements have been completed, with all agreements finalized. All renewal agreements have five-year terms covering the period from May 1, 2025, to April 30, 2030. OPG also has a construction collective agreement directly with the Canadian Union of Skilled Workers (CUSW). This agreement expired on April 30, 2025, and collective bargaining is ongoing.

ENVIRONMENTAL ISSUES SUMMARY

From September 30, 2024 to September 30, 2025, there were no spills associated with the DRP. In addition, regarding radiological and conventional air emissions, there were no infractions in the Program during this period. Radiological and conventional emissions remain well below regulatory limits.

TESTING, START-UP, AND COMMISSIONING

Unit 4 Return-To-Service

Unit 4 is forecasted to begin return-to-service in the fourth quarter of 2025 and complete the return to service by April 2026.

PROGRAM RISKS AND RISK MANAGEMENT

OPG uses a robust risk management process that identifies, classifies, quantifies, and mitigates risks. Industry experience dictates that there will be uncertainties that cannot be avoided on a Program of this size. As such, OPG maintains a detailed inventory of risks and contingency amounts in accordance with the recommended practices of the Association for the Advancement of Cost Engineering International, a leading authority in the area of cost estimation. These contingency amounts are expected to be used over the course of the Program.

The program risks being managed by OPG include:

- Turbine Generator issues during dynamic testing; work may be impacted by plant conditions/emergent issues.
- Discovery work, including additional leak checks may be required during restoration activities, across multiple bundles, with a potential impact to Return to Service.

³ EPSCA is a voluntary association of owners and contractors who perform work in Ontario's electrical power systems sector

STAFFING

REFURBISHMENT RESOURCES

Table 6 provides a summary of the OPG Resources on the Program.

Table 6 – Full Time Equivalent (FTE) Resources by Year (Plan vs. Actual)							
Measure	2019	2020	2021	2022	2023	2024	2025
Planned at RQE	758	747	N/A				
Planned at U3EE	N/A		880	944	N/A		
Planned at U4EE	N/A				1026 ¹	948	760
Actual ³	850	733	756	775	859	893	750 ²

Notes:

1. The variance of OPG resources against plan is primarily driven by the contracting strategy for certain maintenance activities.
2. Actual FTEs for 2025 are as of September Year to Date.
3. Actuals for 2020 to 2023 restated based on a historical FTE rebalancing of employee benefits and retroactive organizational changes.