

September 25, 2015

VIA Email, Courier and RESS

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Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: EB-2015-0148 – IESO Comments on Proposed Amendments to the Distribution System Code, the Unit Sub-Metering Code, the Retail Settlement Code and the Standard Supply Service Code for Electricity Distributors and the Gas Distribution Access Rule to Implement the Ontario Electricity Support Program

The IESO is in receipt of the Board's [Notice of Proposal](#) of September 14, 2015 to amend the above-mentioned codes in order to support the implementation and ongoing operation of the Ontario Electricity Support Program ("OESP") and appreciates the opportunity to provide its comments.

The IESO has reviewed the proposed code amendments and recommends wording changes to both the Distribution System Code ("DSC") and the Unit Sub-Metering Code ("USMC").

As proposed, section 9.6.1 of the DSC and section 5.7.1 of the USMC require the distributor ("LDC") or unit sub-meter provider ("USMP") to settle with the IESO by the 20th day of the month. The IESO's settlement process is defined in the market rules and is different from the proposed date. The IESO will require the LDC or USMP to submit their data by the 4th business day following the end of the month.

In order to align these codes with the IESO's settlement process, the IESO recommends deleting the words "no later than the 20th day of the following month" and replacing them with the words "within such time limits as the IESO specifies". The wording recommendation is consistent with [Ontario Regulation 429/04, section 15](#). The recommended change is illustrated by the highlighted and deleted words below:

Distribution System Code

9.6 Settlement

9.6.1 For each calendar month in which a distributor applies any OESP rate assistance on consumer bills or collects any OESP-related charges, the distributor shall settle with the IESO **within such time limits as the IESO specifies** ~~no later than the 20th day of the following month.~~

Unit Sub-Metering Code

5.7 Settlement

5.7.1 For each calendar month in which a unit sub-meter provider applies any OESP rate assistance on consumer bills or collects any OESP-related charges, the unit sub-meter provider shall settle with the IESO within such time limits as the IESO specifies no later than the 20th day of the following month.

This change would also ensure that any requirement to change the associated market rules, would not affect the need for a change to the DSC and USMC.

The IESO appreciates the Board's consideration of its comments and being part of the implementation and ongoing operation of the OESP.

Yours truly,



Nancy Marconi
Manager, Regulatory Proceedings, IESO

cc: Candice Trickey - Manager, Market Strategy and Rules, IESO