VINCENT J. DEROSE T 613.787.3589 vderose@blg.com Borden Ladner Gervais LLP World Exchange Plaza 100 Queen St, Suite 1300 Ottawa, ON, Canada K1P 1J9 T 613.237.5160 F 613.230.8842 blg.com



By electronic filing

March 14, 2014

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27<sup>th</sup> floor Toronto, ON M4P 1E4

Dear Ms. Walli,

Independent Electricity System Operator ("IESO")Fiscal 2014 Fees Submissions for ReviewBoard File No.:EB-2013-0381Our File No.:339583-000170

Pursuant to Procedural Order No. 1 dated January 31, 2014, please find attached the Interrogatories of Canadian Manufacturers & Exporters ("CME") to the Independent Electricity System Operator ("IESO").

Yours very truly,

A Castanza

Vincent J. DeRose

\slc

enclosure

c. Adrian Pye and Jessica Savage (IESO) Glenn Zacher (Stikeman Elliott LLP) Intervenors EB-2013-0381 Paul Clipsham (CME)

OTT01: 6214616: v1

**IN THE MATTER OF** Sections 18 and 19 of the *Electricity Act, 1998*;

**AND IN THE MATTER OF** the Independent Electricity System Operator Fiscal Year 2014 Fees Submission for Review.

## INTERROGATORIES OF CANADIAN MANUFACTURERS & EXPORTERS ("CME") TO INDEPENDENT ELECTRICITY SYSTEM OPERATOR ("IESO")

# **GENERAL**

## 0 – CME 1

Reference: Exhibit A, Tab 1, Schedule 1, page 6 of 9, and Exhibit B, Tab 1, Schedule 1

The IESO has filed its 2014 to 2016 Business Plan in support of the 2014 fees submission for review. CME wishes to better understand the business planning process implemented by the IESO to develop this business plan. To this end, CME requests the following additional information:

- (a) Please provide a detailed description of the IESO's business planning process;
- (b) Did the IESO's Board of Directors provide any instruction or direction on how the IESO should prepare the 2014 to 2016 Business Plan? If so, please produce all such instructions or directions.
- (c) Were any instructions provided to the IESO business units by IESO senior management on how to prepare either the 2014 to 2016 Business Plan, or planning information required by the 2014 to 2016 Business Plan? If so, please produce those instructions or directions.
- (d) Please provide all presentations, PowerPoint, memoranda or other written material presented to the IESO Board of Directors dealing with the development of the 2014 to 2016 Business Plan. In answering this question, please ensure that you also provide all presentations, PowerPoint, memoranda or other written material presented to the Board of Directors dealing with the draft Business Plan.
- (e) Did the IESO Board of Directors make any changes, or provide any feedback or other comments in response to either the draft 2014 to 2016 Business Plan or portions thereof? If yes, please provide a summary of the changes, feedback or comments. If the changes, feedback or comments were provided in written form, please produce the written documents.

#### 0 – CME 2

On October 1, 2013, Bruce Campbell provided the proposed 2014 to 2016 Business Plan to the Minister of Energy. In the second paragraph of that letter, Mr. Campbell states that the resulting revenues would be significantly lower than previous forecasts issued as part of the 2012 to 2014 Business Plan which was the last multi-year business year submitted to the Minister of Energy.

- (a) Please confirm that the Minister of Energy did not approve that 2012 to 2014 Business Plan.
- (b) Please provide a copy of the 2012 to 2014 Business Plan referred to in Mr. Campbell's October 1, 2013 correspondence.

## 3. The IESO Usage Fee

#### **3.1** Is the move to gross billing from net billing appropriate?

Reference: Exhibit B, Tab 1, Schedule 1, and Board Staff Interrogatory 3.1.1

#### CME 3

Board Staff Interrogatory 3.1.1 has asked whether the IESO's proposal to change its fee structure from net billing to gross billing received appropriate stakeholder support and agreement. CME wishes to better understand the stakeholder consultative process undertaken by the IESO. To this end, please:

- (a) Provide a summary of all stakeholder presentations or meetings; and
- (b) Provide all presentations, PowerPoints, memoranda, or other written documents provided by the IESO to its stakeholders.

OTT01: 6208809: v1