

VIA Email, Courier and RESS



December 7, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
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Independent Electricity System Operator

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Dear Ms. Walli:

**Re: Notice of Proposal to Amend the Transmission System Code
Board File No.: EB-2016-0299**

The Independent Electricity System Operator (“IESO”) appreciates the opportunity to provide comments on the Ontario Energy Board’s (“Board” or “OEB”) Notice of Proposal to Amend the Transmission System Code (“TSC”) of October 19, 2016.

The IESO is supportive of the Board’s efforts to remove duplication or out of date provisions in the TSC with NERC standards and NPCC criteria. However, some of the requirements proposed to be deleted are not fully duplicated in the NERC and NPCC requirements. Also, there are transmission facilities in Ontario that are not subject to NERC and NPCC requirements. The IESO believes that the working group should also (1) assess all the requirements proposed to be deleted to ensure there is no reliability gap, and (2) develop recommendations to the Board for removing duplication or out of date provisions in the TSC or to mitigate identified reliability gaps, if any.

The IESO is interested in participating in the OEB working group represented by:

- Ovidiu Vasilachi, Senior Engineer (ovidiu.vasilachi@ieso.ca, (905) 855-6353
- Stephen Burns, Senior Engineer (stephen.burns@ieso.ca, (905) 855-6285

Yours truly,

Adrian Pye
Acting Senior Manager, Regulatory Affairs, IESO

cc: Laurie Reid, Senior Advisor, Regulations, OEB