



## Jay Shepherd

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**BY EMAIL and RESS**

December 20, 2016  
Our File: EB20150275

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2016-0275 – IESO 2016 Fees – SEC Submission on Revised Fees Proposal**

We are counsel to the School Energy Coalition (“SEC”). Pursuant to *Procedural Order No. 5*, these are SEC’s comments regarding the revised fees proposal of the Independent Electricity System Operation (“IESO”) for 2016.

SEC has reviewed the revised proposal and submits that the revised fees proposal is consistent with the Board’s recommendation in its *Decision and Order*. In that decision the Board recommended that a proposal be submitted to recover the approved revenue requirement, through two separate usage fees (domestic and export customers), with each representing a revenue-to-cost ratio of 100% as determined by the Elenchus cost allocation study. The IESO has properly calculated the two usage fees based on those recommendations.

In its cover letter to its revised usage fees request, the IESO states that it is now “neutral as to the month in 2016 the take effect”. SEC submits, for the reasons set out in its submissions filed on October 14, 2016, the effective date of the proposed usage fees should be January 1, 2016.

Yours very truly,  
**Jay Shepherd P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicant and intervenors (by email)

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