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Our File No. 173011

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

**Re: IESO, 2017 Expenditure and Revenue Requirement Submission
Board File No. EB-2017-0150**

BOMA recommends that the EB-2017-0150 proceed by way of an oral hearing.

First, the IESO is requesting substantial incremental funding to support its proposed market renewal program, a major new initiative which needs the scrutiny possible only in an oral hearing.

Second, there are important issues related to commitments the IESO made in EB-2015-0275, including the appropriateness of the IESO's regulatory scorecard (particularly in light of past questions over the IESO's performance metrics), the costs related to IESO's implementing the Ontario GHG Cap and Trade initiative, and CDM, especially given the importance of CDM to a successful Cap and Trade Program, and IESO's new responsibilities for transmission procurement and providing technical reports with respect to the Long-Term Energy Plan, and the IESO's rationale as to why it cannot benchmark its activities relative to other similar Canadian and US agencies. These are all important, potentially contentious issues, which would benefit from exposure in an oral hearing.

Yours truly,

FOGLER, RUBINOFF LLP

Thomas Brett
TB/dd

cc: All Parties (*via email*)