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October 16, 2017

BY COURIER (2 COPIES) AND RESS

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street, Suite 2700, P.O. Box 2319

Dear Ms. Walli:

Toronto, Ontario M4P 1E4

Re: EB-2017-0150 – Independent Electricity System Operator (IESO)

Revenue Requirement

In our letter to the Board of October 5, 2017 we notified the Board and the parties that Environmental Defence would be asking the IESO to provide better interrogatory responses and may be filing a motion depending on the response. That request was made, and the IESO has declined to provide any of the requested information. Therefore, we are filing the attached motion for further and better interrogatory responses and for other related relief as described in the attached Notice of Motion and Submissions.

To expedite the process, Environmental Defence has included both notice of this motion and its submissions in a single document and is filing a complete motion record. If the Board decides to hear this motion in writing, Environmental Defence requests an opportunity to briefly respond in writing to the submissions of the IESO, but only to the extent that the IESO raises points not already addressed in the enclosed submissions.

Please advise us if any further information is required or would be of assistance to the Board.

Yours truly

Kent Elson

Encl.

Cc: Parties in the above matter