

April 30, 2018



**VIA Email, Courier and RESS**

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

**Independent Electricity System Operator**  
1600-120 Adelaide Street West  
Toronto, ON M5H 1T1  
t 416.967.7474  
www.ieso.ca

Dear Ms. Walli:

**Re: Independent Electricity System Operator  
2018 Expenditure and Revenue Requirement Submission  
Ontario Energy Board File No.: EB-2018-0143**

---

Pursuant to subsection 25 (1) of the *Electricity Act, 1998*, please find enclosed, two paper copies of the Independent Electricity System Operator's ("IESO") proposed 2018 Expenditure and Revenue Requirement Submission ("Submission") for review and approval of the Ontario Energy Board ("OEB"). All intervenors to the IESO's 2017 Revenue Requirement Submission, EB-2017-0150, have been copied on this Submission.

There are several procedural matters that the IESO wishes to raise with the OEB at this time. First, the IESO proposes that the OEB's Notice of Hearing ("Notice") be given in a manner similar as was required for the IESO's 2017 Submission, EB-2017-0150, which was as follows:

- The IESO shall post the Notice, and a link to the OEB's webpage where all official documents in this application will be posted, on the IESO's website at the "2018 Revenue Requirement Submission" page (<http://www.ieso.ca/en/corporate-ieso/regulatory-accountability/revenue-requirement-submission>) page;
- The IESO shall post an announcement, in English and French, on the IESO's website at the "IESO News" page (<http://ieso.ca/sector-participants/ieso-news>);
- The IESO shall email the announcement to all market participants and interested parties who are registered to receive IESO news and other communiqués (this includes all connection proponents with respect to whom the IESO maintains a public registry);
- The IESO shall serve an electronic copy of the Notice and the Submission, including the pre-filed evidence, on all registered intervenors to EB-2017-0150;
- The IESO shall make a copy of the Notice, the application and the evidence, and any amendments thereto, available for public review at the IESO's office and on the "Regulatory Accountability" page on the IESO's website; and
- The IESO shall provide a copy of the Notice, the application and the evidence, and any amendments thereto, to anyone requesting these materials.

Mr. Kirsten Walli

April 30, 2018

Page 2

---

The IESO has included a draft Issues List which it believes addresses the issues of relevance to this proceeding and requests that this be posted for comment along with the Notice. The draft Issues List is attached hereto as Appendix "A" for the OEB's consideration and the IESO requests that the OEB finalize the Issues List prior to parties filing interrogatories.

In addition, the IESO requests it be allowed three weeks to respond to interrogatories.

Please contact me or Beverly Nollert, Senior Regulatory Advisor, if you have any questions or wish to discuss these points further.

Yours truly,

A handwritten signature in blue ink, appearing to read "Tam Wagner", is written over a light blue horizontal line.

Tam Wagner

Senior Manager, Regulatory Affairs

cc: Mr. Fred Cass, Aird & Berlis (email)  
Intervenors to EB-2017-0150 (email)

**Appendix "A"**  
**IESO Fiscal Year 2018 Revenue Requirement Submission**  
**Draft Issues List**  
**EB-2018-0143**

**1.0 Revenue Requirement, Operating Costs and Capital Spending**

- 1.1 Is the IESO's Fiscal Year 2018 net revenue requirement of \$190.8 million appropriate?
- 1.2 Is the IESO's Registration & Application Fees revenue forecast of \$0.0 million for Fiscal Year 2018 appropriate?
- 1.3 Are the IESO's projected staffing levels and compensation (including salaries, benefits, pensions and other post-employment benefits) appropriate and reasonable?
- 1.4 Is the IESO's Capital Expenditure budget for Fiscal Year 2018 appropriate?

**2.0 Usage Fees**

- 2.1 Is the allocation of energy volumes and costs between domestic and export markets reasonable?
- 2.2 Is the methodology used to derive the proposed IESO Usage Fees and the resulting Usage Fees of \$1.2402/MWh for domestic customers and \$1.0115/MWh for export customers appropriate?
- 2.3 Is the proposed January 1, 2018 effective date for the Usage Fees appropriate?

**3.0 Registration and Application Fees**

- 3.1 Are the Registration Fees of up to \$10,000 per proposal for electricity supply and capacity procurements, including conservation and load management procurements, appropriate?
- 3.2 Is the \$1,000 Application Fee for market participation appropriate?

**4.0 The Deferral and Variance Account**

- 4.1 Is the IESO's proposal to retain an Operating Reserve of \$6 million in the Forecast Variance Deferral Account appropriate?
- 4.2 Is the IESO's proposal to clear the 2017 Year-End balance in the Forecast Variance Deferral Account that is in excess of the \$6 million operating reserve appropriate?

## **6.0 Market Renewal Program**

- 6.1 Is the level of reporting on the Market Renewal Program appropriate?
- 6.2 Is the proposal to provide a comparison of actual annual achievement against plan, as described in a) and b) below, appropriate?
  - a) Comparison of budget and actual operating and capital costs by initiative (available in the 2019 Revenue Requirement Submission filing for 2018); and
  - b) Quantification of the project performance measures of Cost Performance Index (“CPI”) and Schedule Performance Index (“SPI”) (available in the 2020 Revenue Requirement Submission for 2019).

## **5.0 Commitments from Previous OEB Decisions**

- 5.1 Is the IESO's 2018 Regulatory Scorecard appropriate?
- 5.2 Is the Corporate Cost Allocation Study Appropriate?