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March 19, 2019

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli,

**RE: EB-2019-0002 IESO Application for 2019 Revenue Requirement and Fees
Energy Probe Comments on the Draft Issues List**

Following are the comments of Energy Probe on the Draft Issues List proposed by the IESO.

Energy Probe notes that Issue 5.2 (Mercer Report) only addresses Compensation for represented and non-represented staff. It does not address the broader issue of Total Payroll costs including Staffing Levels as was the case in last year's Issues List:

1.3 Are the IESO's projected staffing levels and compensation (including salaries, benefits, pensions and other post-employment benefits) appropriate and reasonable?

Accordingly, Energy Probe suggests that proposed Issue 5 be amended as follows:

5.2 Are the IESO's projected staffing levels and Total Compensation for represented and non-represented staff appropriate?

Comparing to last year's approved Issues List, Energy Probe notes that the following issues related to the Market Renewal Program are not included in the Draft Issues List proposed by the IESO:

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6.1 Does the “Market Renewal Program Cost Report” provide sufficient information on the financial and operational performance of the Market Renewal Program for 2017, 2018 year to date and 2018 forecast?

6.2 Are the IESO's forecast 2018 operational costs for the Market Renewal Program appropriate in the context of the scope and timing of the overall project?

6.3 Are the IESO's forecast 2018 capital costs for the Market Renewal Program appropriate in the context of the scope and timing of the overall project?

Energy Probe suggests that these remain significant issues and should be included in the 2019 Issues List with changes to the years listed to make the issues appropriate for the 2019 proceeding.

Respectfully submitted on behalf of Energy Probe.

Original signed by

Tom Ladanyi
Consultant to Energy Probe