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Reply To: **Thomas Brett** Direct Dial: 416,941,8861 E-mail: tbrett@foglers.com Our File No. 191104

## VIA RESS, EMAIL AND COURIER

fogler rubinoff

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

Attention:

Kirsten Walli, **Board Secretary** 

Dear Ms. Walli:

EB-2019-0002: IESO, 2019 Expenditure, Revenue Requirement, and Fees Submission Re:

BOMA submits the following comments on IESO's proposed Issues List.

BOMA has reviewed that part of the evidence dealing with the MRP and the 2019-2021 Business Plan, and has reviewed the comments of AMPCO, which were filed yesterday.

BOMA strongly supports the four additional issues suggested by AMPCO, namely its proposed Issues 6.2, 6.3, 6.4, and 7.0, essentially for the same reasons AMPCO has provided. BOMA notes that the first three of those issues are also supported by Energy Probe.

Finally, BOMA notes that the IESO stated that the total MRP program budget is now estimated at \$247 million.

The IESO goes on to state that:

"The increased total budget compared to earlier estimates reflects additional definition to the program scope through the development of the HLDs and the associated additional program planning work that has been completed". (Exhibit C, Tab 2, Schedule 1, p11)



The increasing estimates of total program spend provides further support to the maintenance of issues 6.2, 6.3, and 6.4 in the Issues List for this proceeding. BOMA also suggests that an additional issue be added as 6.5.

"Is the proposed increase in the total MRP program budget to \$247 million appropriate?"

Yours truly,

FOGLER, RUBINOFF LLP

**Thomas Brett** 

TB/dd

cc: All Parties (via email)