

BY EMAIL

August 7, 2019

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

Dear Ms. Walli:

Re: Independent Electricity System Operator (IESO) IESO Application for Approval of 2019 Expenditures, Revenue Requirement, and Fees OEB Staff Submission on Settlement Proposal

Ontario Energy Board File Number: EB-2019-0002

In accordance with Procedural Order No. 5, please find attached the OEB Staff Submissions on the Settlement Proposal dated August 2, 2019 filed by the IESO for the above proceeding.

Yours truly,

Original Signed By

Andrew Bishop Project Advisor, Supply & Infrastructure

cc: Parties to EB-2019-0002



OEB Staff Submission on Settlement Proposal

Independent Electricity System Operator's Application for Approval of 2019 Expenditures, Revenue Requirement, and Fees

Independent Electricity System Operator

EB-2019-0002

August 7, 2019

Background

On August 2, 2019, the Independent Electricity System Operator (IESO) filed a settlement proposal for the Ontario Energy Board's (OEB) review and approval. The proposal reflects the agreement reached between the IESO and participating intervenors on some, but not all, issues. Several of the main issues in this proceeding, including the appropriate amount of the IESO's 2019 revenue requirement and the resulting usage fees, remain unresolved.

OEB staff submits that the settlement proposal is in the public interest, and that the accompanying explanation and rationale is adequate to support the settlement proposal.

For several of the settled issues, the settlement proposal notes that the agreed upon outcome is the same as what the OEB approved in the IESO's 2018 fees case¹. On that basis, OEB staff considers these aspects of the settlement to be reasonable:

- i. **Issue 2.1 (partial settlement, on the methodology only but not the level of the fees):** *Is the methodology used to derive the proposed IESO Usage Fees and the resulting Usage Fees of \$1.227/MWh for domestic customers and \$1.0125/MWh for export customers appropriate?*
- ii. **Issue 3.1**: Are the Registration Fees of up to \$10,000 per proposal for electricity supply and capacity procurements, including ancillary services, appropriate?
- iii. Issue 3.2: Is the \$1,000 Application Fee for market participation appropriate?

OEB staff has reviewed the evidentiary record related to the following settled issues and believes that the basis for settlement is reasonable:

- i. **Issue 1.2**: Is the IESO's Registration & Application Fees revenue forecast of \$0.0 million for Fiscal Year 2019 appropriate?
- ii. **Issue 2.2**: Is the proposed January 1, 2019 effective date for the Usage Fees appropriate?
- iii. Issue 5.1: Is the IESO's 2019 Regulatory Scorecard appropriate?

¹ EB-2018-0143

iv. **Issue 5.3**: Has the IESO adequately described the division of responsibilities between the IESO and Hydro One Networks Inc. with respect to Transmission Losses?

In its cover letter enclosing the settlement proposal, the IESO requested two weeks to file updated evidence on recent changes to the Market Renewal Program (MRP) and suggested that the parties be given an opportunity to ask written interrogatories on that evidence. OEB staff agrees that it would be of assistance to the OEB to receive updated evidence on the changes to the MRP and any implications for the IESO's 2019 fees application, and that another round of interrogatories on that evidence would be appropriate.

All of which is respectfully submitted