

# Stikeman Elliott

Stikeman Elliott LLP  
Barristers & Solicitors  
5300 Commerce Court West  
199 Bay Street  
Toronto, ON Canada M5L 1B9

Main: 416 869 5500  
Fax: 416 947 0866  
www.stikeman.com

Glenn Zacher  
Direct: (416) 869-5688  
GZacher@stikeman.com

February 13, 2020

**SENT BY ELECTRONIC MAIL, FILED ON  
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Ms. Christine Long  
Registrar & Board Secretary  
Ontario Energy Board  
27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

**RE: Association of Major Power Consumers in Ontario Application to Review Amendments to the Market Rules Made by the Independent Electricity System Operator  
Board File No.: EB-2019-0242  
Costs Claims Submission of the Independent Electricity System Operator**

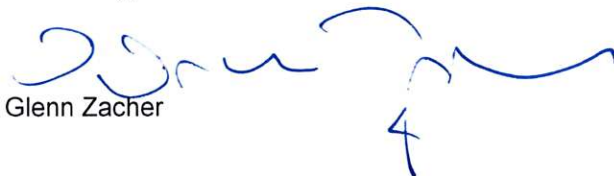
Dear Ms. Long:

Please accept the response of the Independent Electricity System Operator ("IESO") to the costs claims submitted by the Association of Major Power Consumers in Ontario ("AMPCO"); School Energy Coalition ("SEC"); Association of Power Producers of Ontario ("APPRO"); and Kingston Cogen Limited Partnership ("KCLP").

As a general note, the IESO is of the view that counsel and consultants in this proceeding acted reasonably and efficiently and made efforts to allocate responsibilities so as to promote efficiency and avoid duplication. The IESO does not object to the costs claims submitted by APPRO, SEC, and AMPCO in light of its revised submissions, dated February 11, 2020. The IESO's comments are limited to the costs claimed by KCLP.

The IESO agrees that Dr. Rivard professionally discharged his obligations as an independent expert and provided evidence that was helpful to the Board. The IESO nevertheless maintains that KCLP is not entitled to recover its costs in this proceeding for reasons earlier stated and as determined by the Board.<sup>1</sup>

Yours truly,



Glenn Zacher

cc: James Hunter (IESO)  
Michael Bell (OEB Staff)  
Ljuba Djurdjevic (Counsel to OEB)  
Intervenors of Record

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<sup>1</sup> See Decision on Cost Responsibility & Cost Eligibility (OEB), EB-2019-0242, November 12, 2019 at p 5; Cost Submissions of the Independent Electricity System Operator Pursuant to Procedural Order No. 2, EB-2019-0242, October 23, 2019.