

Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attn: Ms. C. Long  
Registrar

July 22, 2021

Dear Ms. Long

Re: **EB-2020-0230**

On behalf of the Electricity Distributors Association (EDA), I am pleased to provide our comments on the Independent Electricity System Operator's (IESO) proposed Issues List in the above-named matter.

We propose that the Ontario Energy Board (OEB) revise the wording of issues 1.7 and 4.1 as follows:

- Issue 1.7: add "What are the IESO's capital expenditure financial controls and are they appropriate?"
- Issue 4.1: add "Is the IESO's accounting of the costs of MRP appropriate for the purpose of setting fees for 2020 and 2021?"
- Issue 4.1: add "Has the IESO appropriately allocated the costs of MRP?"

We also propose that the OEB augment the IESO's proposed Issues List to include the following issues:

- How do the IESO's Cyber Security duties (e.g., in connection with Project Lighthouse) impact its proposed Fees? Is this impact appropriate?
- Has the IESO appropriately incorporated the ongoing lessons learned from the COVID pandemic and the associated cost impacts?
- Has the demarcation point between the IESO Administered Market and LDCs been appropriately reflected in the proposed revenue requirements for 2020 and 2021?
- How has the IESO ensured that no undue cross subsidization will occur between and among its fees, rates and charges?

Thank you for the opportunity to review and comment on the IESO's proposed Issues List. If you have any questions or require any clarification, please do not hesitate to contact Kathi Farmer, the EDA's Senior Regulatory Affairs Advisor, at [kfarmer@eda-on.ca](mailto:kfarmer@eda-on.ca) or at 416.659.1546.

Sincerely yours,



Ted Wigdor  
Vice President  
Policy, Government & Corporate Affairs