

September 9, 2021

**VIA Email and RESS**



Ms. Christine Long  
Registrar  
Ontario Energy Board  
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**Independent Electricity System Operator**  
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Dear Ms. Long,

**Re: Independent Electricity System Operator  
2020 and 2021 Expenditure and Revenue Requirement Submissions  
Ontario Energy Board File No.: EB-2020-0230**

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The Independent Electricity System Operator (IESO) is writing to file interrogatory responses (IRRs) in accordance with the Ontario Energy Board's (OEB) Procedural Order No. 2 dated July 23, 2021.

The IESO notes that some interrogatories have raised questions/issues which the IESO believes are beyond the scope of this proceeding. The IESO has, in some cases, provided responses in an effort to be of assistance to the parties. The fact that the IESO has provided an answer to these interrogatories should not be taken as any indication that the IESO considers these areas of enquiry to be appropriate for this revenue requirement proceeding.

With its filing, the IESO has included an updated exhibit list. The IRRs have been organized by issue according to the Final Issues List in the OEB's Decision on Issues List dated August 12, 2021. The updated exhibit list and the chart below help to illustrate this. For example, each IRR has specific references in the header such as: **Exhibit I** - representing Interrogatories, **Tab** - representing the issue, and **Schedule** – numbered to represent the party, their issue and interrogatory (i.e., Exhibit I, Tab 1.5, Schedule 2 – 1.5 AMPCO 11 is the reference to the IESO's IRR to AMPCO Interrogatory 11 under Issue 1.5).

Schedule numbers have been assigned as follows:

<b>Intervenor</b>	<b>Schedule #</b>
OEB STAFF	Schedule 1
AMPCO	Schedule 2
APPrO (+HQEM)	Schedule 3
REASCWA	Schedule 4
CME	Schedule 5
ED	Schedule 6
EDA	Schedule 7
Energy Probe	Schedule 8
OSEA	Schedule 12
PWU	Schedule 13
SEC	Schedule 14
VECC	Schedule 16

**Confidentiality Request**

In accordance with Rule 10 of the OEB's Rules of Practice and Procedure and section 5.1 of the OEB's Practice Direction on Confidential Filings (Practice Direction), the IESO requests confidential treatment for the attachments provided as part of the interrogatory responses to Schedule 14 – 1.5 SEC 15, 1.5 SEC 16, 1.5

SEC 17 and 1.5 SEC 18 (SEC 15-18).

The attachments were developed as internal documents and contain information that is not the relevant business case information expected by the OEB's Decision and Order to EB-2019-0002 and as provided for in the IESO's application. As noted above, in an effort to be of assistance to the parties, the IESO is filing the attachments but requests that the redacted portions in the attachments be protected because its disclosure relates to public security. Disclosing information that relates to the IESO's IT systems creates a cyber security risk which would allow for a threat actor to gain insights into IESO systems and status that could be used for malicious purposes. As well, disclosing the names of individuals and detailed document IDs, or other identifiers, provide specifics that would enhance attacks against the IESO, such as phishing and impersonation attacks, that would allow a threat actor to obtain sensitive information. The IESO notes that the items that have been redacted from the documents that are the subject of this confidentiality request, have no bearing to the consideration of any issues in this proceeding.

### **Attachments**

The IESO has provided redacted and un-redacted versions of the following:

Schedule 14 – 1.5 SEC 15 Attachment 1 – Project Charter - RSS

Schedule 14 – 1.5 SEC 16 Attachment 1 - Project Charter - SCADA-EMS Upgrade

Schedule 14 – 1.5 SEC 17 Attachment 1 – Project Charter - CAMS Replacement

Schedule 14 – 1.5 SEC 18 Attachment 1 – Project Charter - Capacity Auction

### **Confidential Treatment Procedure**

The IESO is mindful of the timing of the Settlement Conference scheduled for September 15<sup>th</sup> and in the interest of efficiency, prior to the OEB making its final determination on the IESO's request for confidential treatment, the IESO is supportive of proceeding as though the IESO's request for confidentiality has been granted. On a final determination, should the OEB grant IESO's request for confidentiality, IESO proposes that the OEB order the documents be disclosed, subject to any conditions the OEB may find appropriate, to only those persons that by then have already signed, or that subsequently sign, a Declaration and Undertaking.

Please contact me directly at 416-957-3594 or [Devon.Huber@ieso.ca](mailto:Devon.Huber@ieso.ca) if you have any questions.

Yours truly,



Devon Huber  
Acting Director, Regulatory Affairs & Market Rules

cc: Mr. Fred Cass, Aird & Berlis LLP (email)  
All EB-2020-0230 Intervenors (email)