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BY EMAIL

January 20, 2022

Ms. Nancy Marconi
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Registrar@oeb.ca

Dear Ms. Marconi:

**Re: Generic UTR Issues Proceeding
Export Transmission Service Rate
Ontario Energy Board File Number: EB-2021-0243**

In accordance with Procedural Order No.1 please find attached OEB staff's comments on the Draft Issues List, in reply to the submissions of other parties in the above referenced proceeding. This document has been sent to all registered parties in this proceeding.

Yours truly,

Michael Price
Project Advisor - Generation and Transmission

cc: All parties in EB-2021-0243



ONTARIO ENERGY BOARD

OEB STAFF SUBMISSION ON THE DRAFT ISSUES LIST IN REPLY TO THE COMMENTS OF PARTIES TO THE PROCEEDING

GENERIC UTR ISSUES PROCEEDING

EXPORT TRANSMISSION SERVICE RATE

EB-2021-0243

JANUARY 20, 2022

INTRODUCTION

Hydro One filed its Joint Rate Application for 2023-2027 transmission and distribution rates (referred to here as the JRAP proceeding) on August 5, 2021. Hydro One filed evidence on the Export Transmission Service (ETS) rate as part of that application. In Procedural Order No.1 in the JRAP proceeding, the OEB stated that addressing the ETS rate in a Generic Uniform Transmission Rates (UTR) Issues proceeding will lend focus to the issue and facilitate participation by transmitters and other stakeholders without requiring them to intervene in the much broader JRAP proceeding. The OEB has assigned File Number EB-2021-0243 to the Generic UTR Issues proceeding.

Hydro One and the IESO provided additional ETS material on October 14, 2021 in response to Procedural Order No. 1 of the JRAP proceeding.

On November 30, 2021 the OEB issued Procedural Order No.1 of the Generic UTR Issues proceeding which included a draft issues list prepared by OEB staff. Intervenors were invited to file written submissions on the draft issues list. Intervenors Pollution Probe and IESO, and observer Mr. Naren Pattani, filed submissions on the draft issues list. No other intervenors filed submissions.

Procedural Order No.1 provides that, following these submissions, OEB staff and intervenors may provide additional comments regarding the submissions of other parties. OEB staff comments on these submissions follow.

1. Pollution Probe and IESO

Pollution Probe has no proposed edits to the draft issues list and the IESO supports the proposed draft issues list. OEB staff has no comments regarding the Pollution Probe and IESO submissions.

2. Mr. Naren Pattani

Mr. Pattani proposed that Issue 1 of the draft issues list should include a comparison with neighbouring jurisdictions that export to Ontario or wheel energy using the transmission system of Ontario to determine whether they have at least some (i.e., non-zero) regulated transmission network tariff charge applicable to all exports out of the province or state.

OEB staff suggests that this item is consistent with the scope of Issue 1 and that no revisions are required to the issues list. OEB staff will ask about this item in interrogatories.

Mr. Pattani also proposed that Issue 2 of the draft issues list should include the question of whether export transactions and wheel-through transactions attract any Intertie

Congestion Pricing if they are scheduled through intertie(s) that do not experience congestion.

OEB staff suggests that this item is consistent with the scope of Issue 2 and that no revisions are required to the issues list. OEB staff will ask about this item in interrogatories.

~All of which is respectfully submitted~