

March 4, 2022

VIA Email and RESS

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

Independent Electricity System Operator

1600-120 Adelaide Street West
Toronto, ON M5H 1T1
t 416.967.7474

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Dear Ms. Marconi,

**Re: Independent Electricity System Operator
2022 Expenditure and Revenue Requirement Submission
Ontario Energy Board File No.: EB-2022-0002**

Revenue Requirement Submission

Pursuant to subsection 25(1) of the Electricity Act, 1998, the Independent Electricity System Operator (IESO) is hereby filing its 2022 Expenditure and Revenue Requirement Submission for review and approval by the Ontario Energy Board (OEB).

The IESO wishes to raise the following procedural issues with the OEB at this time. First, the IESO proposes that the OEB's Notice of Hearing (Notice) be given in the following manner:

- The IESO shall post the Notice, and a link to the OEB's webpage, where all official documents in this application will be posted, on the OEB Applications section of the IESO's Regulatory Accountability webpage: <https://www.ieso.ca/en/Corporate-IESO/Regulatory-Accountability/OEB-Applications>;
- The IESO shall post an announcement, in English and French, on the IESO's News Releases webpage: <https://www.ieso.ca/en/Corporate-IESO/Media/News-Releases>;
- The IESO shall email the announcement to all market participants and interested parties who are registered to receive IESO news and other communiqués (this includes all connection proponents with respect to whom the IESO maintains a public registry);
- The IESO shall serve an electronic copy of the Notice and Revenue Requirement Submission, including the pre-filed evidence, on all registered intervenors in its 2021 Expenditure and Revenue Requirement Submission proceeding (EB-2020-0230); and
- The IESO shall provide an electronic copy of the Notice, the Revenue Requirement Submission and the evidence, and any amendments thereto, to anyone requesting these materials.

The IESO has included a draft Issues List which it believes addresses the issues of relevance to this proceeding and requests that this be posted for comment along with the Notice. The draft

Issues List is attached as Appendix "A" for the OEB's consideration and the IESO requests that the OEB finalize the Issues List prior to parties filing interrogatories.

In addition, the IESO requests that it be provided three weeks to respond to interrogatories.

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, the IESO requests confidential treatment for Exhibit G-1-1 Attachment 2 – Project Charter (DLRT), and Exhibit G-1-1 Attachment 3 – Project Charter (MAST).

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. The IESO is filing the attachments but requests confidential treatment for the redacted portions in the attachments for the following reasons:

- 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 could allow a threat actor to obtain sensitive information. Individual names also constitute personal information and are not relevant to the proceeding.
- Disclosing information that relates to yet to be launched procurements could interfere significantly with negotiations being carried out by the IESO.
- Information consists of technical material of a third party.

A table specifying the rationale for the information requested to be redacted is attached as "Appendix B". 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.

Please contact me directly at 416-957-3594 or at Devon.Huber@ieso.ca if you have any questions.

Yours truly,



Devon Huber
Director, Regulatory Affairs & Market Rules

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

Appendix A

DRAFT ISSUES LIST

12 Issues

1.0 Revenue Requirement, Operating Costs and Capital Spending

- 1.1** Is the IESO's Fiscal Year 2022 revenue requirement of \$201.5 million appropriate?
- 1.2** Are the IESO's 2022 projected staffing levels and compensation (including salaries, benefits, pensions and other post-employment benefits) appropriate?
- 1.3** Is the IESO's 2022 capital expenditure envelope of \$71.2 million for capital projects for Fiscal Year 2022 appropriate?

2.0 Usage Fees

- 2.1** Is the methodology used to derive the IESO's proposed 2022 Usage Fees of \$1.271/MWh for domestic customers (including embedded generation) and \$1.0943/MWh for export customers to be paid commencing January 1, 2022 appropriate?
- 2.2** Is the IESO's request to charge (or rebate) market participants the difference between the approved 2022 IESO Usage Fees and the interim fees they paid in the next billing cycle following the month in which OEB approval received appropriate?
- 2.3** Is the proposed January 1, 2022 effective date for the IESO's 2022 Usage Fees appropriate?

3.0 Reliable Integration Fee

- 3.1** Is the IESO's proposal to charge proponents a Reliable Integration fee at an hourly rate of \$145/hour for activities the IESO undertakes to reliably integrate new or modified facilities to the IESO-Controlled Grid appropriate?

4.0 Market Renewal Program (MRP)

- 4.1** Is the reporting on financial and operational performance of the MRP appropriate?
- 4.2** Are the IESO's forecast 2022 operational costs for the MRP appropriate in the context of the scope and timing of the overall project?
- 4.3** Are the IESO's forecast 2022 capital costs for the MRP appropriate in the context of the scope and timing of the overall project?

4.4 Is the IESO's MRP Baseline Schedule and Budget for each year of the MRP appropriate?

5.0 Commitments from Previous OEB Decisions

5.1 Has the IESO adequately described the progress made towards reaching the 50th percentile for total remuneration?

Appendix B
CONFIDENTIALITY REQUEST TABLE

Exhibit E-2-1 Attachment 2 – Project Charter (DLRT)

Item	Page	Rationale for Redaction
1	1	Document ID – redacted for cyber security and relevance
2	1	Personal information - redacted for cyber security and relevance
3	1	Personal information - redacted for cyber security and relevance
4	1	Project ID – redacted for cyber security and relevance
5	1	The information consists of technical material of a third party (Appendix A(b))
6	4	Internal IESO systems – redacted for cyber security and relevance
7	4	Internal IESO systems – redacted for cyber security and relevance
8	6	Internal IESO systems – redacted for cyber security and relevance
9	6	Internal IESO systems – redacted for cyber security and relevance
10	6	Internal IESO systems – redacted for cyber security and relevance
11	6	Internal IESO systems – redacted for cyber security and relevance
12	8	Internal IESO processes – redacted for cyber security and relevance
13	8	Internal IESO systems – redacted for cyber security and relevance
14	9	Internal IESO systems – redacted for cyber security and relevance
15	9	Internal IESO systems – redacted for cyber security and relevance
16	16	Personal information - redacted for cyber security and relevance
17	17	Internal IESO systems – redacted for cyber security and relevance
18	18	Internal IESO systems – redacted for cyber security and relevance
19	23	Links – redacted for relevance (links are non-functional)
20	24	Internal IESO systems – redacted for cyber security and relevance
21	24	Internal IESO systems – redacted for cyber security and relevance
22	30	Internal IESO systems – redacted for cyber security and relevance
23	30	Personal information - redacted for cyber security and relevance
24	30	Personal information - redacted for cyber security and relevance
25	30	Personal information - redacted for cyber security and relevance
26	30	Personal information - redacted for cyber security and relevance
27	30	Personal information - redacted for cyber security and relevance
28	30	Personal information - redacted for cyber security and relevance
29	30	Personal information - redacted for cyber security and relevance
30	30	Personal information - redacted for cyber security and relevance
31	30	Personal information - redacted for cyber security and relevance
32	30	Personal information - redacted for cyber security and relevance
33	31	Personal information - redacted for cyber security and relevance
34	31	Personal information - redacted for cyber security and relevance
35	31	Personal information - redacted for cyber security and relevance
36	31	Personal information - redacted for cyber security and relevance
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38	31	Personal information - redacted for cyber security and relevance
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41	31	Personal information - redacted for cyber security and relevance
42	31	Personal information - redacted for cyber security and relevance
43	31	Personal information - redacted for cyber security and relevance
44	31	Personal information - redacted for cyber security and relevance
45	31	Personal information - redacted for cyber security and relevance
46	31	Personal information - redacted for cyber security and relevance
47	31	Personal information - redacted for cyber security and relevance
48	32	Personal information - redacted for cyber security and relevance
49	32	Internal IESO systems – redacted for cyber security and relevance
50	32	Document ID – redacted for cyber security and relevance
51	32	Document ID – redacted for cyber security and relevance
52	32	Document ID – redacted for cyber security and relevance

Exhibit E-2-1 Attachment 3 – Project Charter (MAST)

Item	Page	Rationale for Redaction
1	1	Document ID – redacted for cyber security and relevance
2	1	Personal information - redacted for cyber security and relevance
3	1	Personal information - redacted for cyber security and relevance
4	1	Project ID – redacted for cyber security and relevance
5	4	Internal IESO systems – redacted for cyber security and relevance
6	7	Internal IESO processes – redacted for cyber security and relevance
7	7	Internal IESO systems – redacted for cyber security and relevance
8	8	Internal IESO systems – redacted for cyber security and relevance
9	12	Personal information - redacted for cyber security and relevance
10	13	Redacted for potential harm that could result from the disclosure of the information including: interfering significantly with negotiations to be carried out by the IESO. Appendix A(a).
11	14/15	Redacted for potential harm that could result from the disclosure of the information including: interfering significantly with negotiations to be carried out by the IESO. Appendix A(a).
12	18	Redacted for potential harm that could result from the disclosure of the information including: interfering significantly with negotiations to be carried out by the IESO. Appendix A(a).
13	19	Analysis of an unrelated program - Redacted for relevance
14	20	Internal IESO systems – redacted for cyber security and relevance
15	20	Personal information - redacted for cyber security and relevance
16	20	Personal information - redacted for cyber security and relevance
17	20	Personal information - redacted for cyber security and relevance
18	20	Personal information - redacted for cyber security and relevance
19	20	Personal information - redacted for cyber security and relevance
20	20	Personal information - redacted for cyber security and relevance
21	20	Personal information - redacted for cyber security and relevance

22	20	Personal information - redacted for cyber security and relevance
23	20	Personal information - redacted for cyber security and relevance
24	20	Personal information - redacted for cyber security and relevance
25	20	Personal information - redacted for cyber security and relevance
26	21	Personal information - redacted for cyber security and relevance
27	21	Personal information - redacted for cyber security and relevance
28	21	Personal information - redacted for cyber security and relevance
29	21	Personal information - redacted for cyber security and relevance
30	21	Personal information - redacted for cyber security and relevance
31	21	Personal information - redacted for cyber security and relevance
32	21	Personal information - redacted for cyber security and relevance
33	21	Personal information - redacted for cyber security and relevance
34	21	Internal IESO systems – redacted for cyber security and relevance
35	22	Document ID – redacted for cyber security and relevance
36	22	Document ID – redacted for cyber security and relevance
37	22	Document ID – redacted for cyber security and relevance