



Ontario | Commission  
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BY EMAIL

April 29, 2022

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
[Registrar@oeb.ca](mailto:Registrar@oeb.ca)

Dear Ms. Marconi:

**Re: Ontario Energy Board (OEB) Staff Submission on Draft Issues List  
Independent Electricity System Operator  
Application for 2022 Revenue Requirement, Expenditures and Usage Fees  
OEB File Number: EB-2022-0002**

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Please find attached the OEB staff submission in the above referenced proceeding, pursuant to Procedural Order No. 1.

Yours truly,

*Original Signed By*

Andrew Bishop  
Senior Advisor, Generation & Transmission

Encl.

cc: All parties in EB-2022-0002



# **ONTARIO ENERGY BOARD**

## **OEB Staff Submission on Draft Issues List**

**Independent Electricity System Operator**

**Application for 2022 Revenue Requirement, Expenditures and  
Usage Fees**

**EB-2022-0002**

**April 29, 2022**

## Background

The Independent Electricity System Operator (IESO) filed an application with the Ontario Energy Board (OEB) on March 4, 2022, under subsection 25(1) of the *Electricity Act, 1998*, seeking approval of its 2022 expenditures, revenue requirement, and usage fees (Application). The Application included a draft issues list. The following are the submissions of OEB staff on the draft issues list.

## OEB Staff Submission

The draft issues list filed by the IESO includes 12 issues grouped under the following five categories:

- 1.0 Revenue Requirement, Operating Costs and Capital Spending
- 2.0 Usage Fees
- 3.0 Reliable Integration Fee
- 4.0 Market Renewable Program (MRP)
- 5.0 Commitments from Previous OEB Decisions

### 1.0. Issue 3.0 Reliable Integration Fee

#### 1.1. Application Fees

The IESO has proposed eliminating the following issue that was included under Issue 3.0 in the last revenue requirement proceeding,<sup>1</sup> and similarly worded issues appeared in prior cases as well:

- ***Is the \$1,000 Application Fee for market participation appropriate?***

OEB staff proposes that Issue 3.0 be renamed to “Application and Reliable Integration Fees” and that the above issue be added as sub-issue 3.2 under Issue 3.

The market participation application fee is charged to organizations that wish to participate in the IESO-administered market. The purpose of the fee is to compensate the IESO for the administrative effort its employees expend to register and authorize market and program participation. The \$1,000 market participation application fee has been charged by the IESO since market opening in 2002 and was last approved by the OEB in its decision on the IESO’s 2020/2021 revenue requirement application.

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<sup>1</sup> EB-2020-0230

OEB staff understands that the IESO proposes to continue charging a flat \$1,000 market participation application fee to organizations that want to participate in the IESO-administered markets or programs, or to connect to the IESO-controlled grid.

## 2.0 Issue 5.0 Commitments from Previous OEB Decisions

### 2.1 IESO Commitments

OEB staff proposes that the following issue replace the IESO's proposed Issue 5.1:

- ***Has the IESO responded appropriately to all OEB directions from previous proceedings?***

The IESO committed to providing information or undertake specific studies, analysis or engagements by way of the OEB-approved settlement proposal in its 2020/2021 revenue requirement proceeding.<sup>2</sup> Exhibit G, Tab 1, Schedule 1 of the Application lists the 18 commitments made by the IESO, as well as its response to each.<sup>3</sup>

The IESO has proposed including one issue under "Issue 5.0 Commitments from Previous OEB Decisions" as follows: *Issue 5.1: Has the IESO adequately described the progress made towards reaching the 50th percentile for total remuneration?* The proposed issue focuses the scope of Issue 5.0 on only one of the 18 commitments made by the IESO.

OEB staff's proposed issue expands the scope of Issue 5.0 to allow for discovery on the actions taken by the IESO in response to the 18 commitments listed in the OEB-approved settlement proposal in the IESO's 2020/2021 revenue requirement proceeding as well as all OEB directions from other proceedings that may be relevant.

OEB staff requests that its proposed issue replace the IESO's proposed Issue 5.1 in order to allow for discovery on all previous commitments made by the IESO.

~All of which is respectfully submitted~

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<sup>2</sup> EB-2020-0230

<sup>3</sup> 17 of these commitments stem from the OEB-approved settlement proposal in the IESO's 2020/2021 revenue requirement application.