

May 24, 2022

BY EMAIL and RESS

Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Attn: Ms. N. Marconi, Registrar

Via the Ontario Energy Board Web portal

Dear Ms. Marconi:

Re: Independent Electricity System Operator for the Fiscal Year 2022 / Smart Metering Entity 2023 to 2027 Smart Meter Charge Application (EB-2022-0137)

The Electricity Distributors Association (EDA) is an intervenor in the above-named matter.

In accordance with Procedural Order No.1 dated May 13, 2022, in the above-noted proceedings these are our comments with respect to the proposed issues list of the IESO.

- 1) The Draft Issues List includes the following issue: '1. Is the Smart Metering Entity's ("SME") proposed \$137.5 million revenue requirement for the January 1, 2023, to December 31, 2027, period appropriate?'

The EDA submits that the issue statement should reference the type and level of activities that the SME will perform each year. As a result, we propose that issue 1 read as follows:

'Issue 1. Is the Smart Metering Entity's (SME) proposed \$137.5M revenue requirement for the period January 1, 2023, to December 31, 2027, appropriate for the type and level of activities that the SME will perform?'

- 2) The Draft Issues List includes the following issue: '5. Are the projections for installed smart meters appropriate?'

The EDA submits that the issue statement should reference the range of years supporting the forecast of installed meters. As a result, we propose that issue 5 read as follows:

'Issue 5. Is the SME's forecast of installed smart meters in the 2023-2027 period based on appropriate data and a sound methodology?'

- 3) The Draft Issues List does not address the SME's Third-Party Access (TPA) activities or its financial impacts. The EDA submits that the Ontario Energy Board (OEB) needs to accurately understand the operation of this charge within this application, its impact on the SME's proposed Smart Meter Charge, and its financial impact on the SME.

The EDA submits that it is necessary to establish either (1) that an existing issue statement subsumes the issue of TPA activities, or (2) that the OEB includes a new issue statement. For example, if issue 1 does not address TPA activities, then the EDA proposes that the following new issue statement should be authorized:

'Issue 9. What Third-Party Access activities will the SME carry out in 2023 - 2027 and are the associated costs appropriately included in the SME's proposed \$137.5M revenue requirement for that period?'

The EDA further submits that it is necessary to either clarify that an existing issue statement(s) subsumes the issue of the financial impacts of the TPA \$145/hour charge or that the OEB includes an issue statement focused on its financial impacts. We seek either confirmation that the proposed issue statements No. 2 and No. 6 will address the financial impacts arising from charging Canadian governmental entities the \$145/hour charge for standard and non-standard requests, or that a new issue statement is appropriate. If a new issue statement is to be authorized, we propose that it read as follows:

'Issue 10. What are the financial consequences of the SME charging Canadian governmental entities \$145/hour to perform TPA activities? Is the SME's proposed accounting, and recording of the proposed Operating Reserve Balancing Account, appropriate?'

The EDA supports the OEB staff's submission to include an issue statement on forecast staffing levels.

Please do not hesitate to contact Brittany J. Ashby, the EDA's Senior Regulatory Affairs Advisor, at 416.886.4420 or bashby@eda-on.ca if you have any questions or require anything further.

Sincerely,



Ted Wigdor
Vice President, Policy, Government and Corporate Affairs

Cc: Adrian Pye, IESO (Email)
Patrick G Duffy, Counsel to the IESO (Email)
All intervenors of record, EB-2022-0137 (Email)