

1 **CCMBC INTERROGATORY 8**

2 Issue 5.0 Commitments from Previous OEB Decisions

3 5-CCMBC-8

4 **INTERROGATORY**

5 **Reference:** Exhibit A-1-3, Page 3, and Exhibit D-1-3, Att.3

6 **Preamble:** *"When comparing the IESO roles to the energy sector, the results of the review*  
7 *conducted show 2% progress towards the 50<sup>th</sup> percentile since the IESO's last review in 2018*  
8 *(see Exhibit D-1-3 Attachment 3 – Non-Executive Total Remuneration Review)."*

- 9 a) Is the IESO satisfied with the 2% its progress towards the 50th percentile target? Please  
10 explain your answer.
- 11 b) When does the IESO expect to reach the 50th percentile target?

12 **RESPONSE**

- 13 a) As the IESO is a unionized environment and any changes to compensation, pension and  
14 benefits must be negotiated, the IESO is encouraged by the progress it has made thus  
15 far in progressing toward the 50<sup>th</sup> percentile target.
- 16 b) In its Decision and Order for EB-2019-0002, the OEB stated "the IESO shall, as part of  
17 all future expenditures, revenue requirement, and fees applications, report on the  
18 progress made towards reaching the 50<sup>th</sup> percentile for total compensation." The IESO is  
19 committed to continuing to make efforts to make progress on this commitment but  
20 given that the IESO must negotiate all compensation and benefit/pension plan changes,  
21 it is not possible to determine a timeline for reaching the 50<sup>th</sup> percentile target.

1 **CCMBC INTERROGATORY 9**

2 Issue 5.0 Commitments from Previous OEB Decisions

3 5-CCMBC-9

4 **INTERROGATORY**

5 **Reference:** Exhibit A-2-2, Att.1, page 2

6 **Preamble:** The 5-year measure of Operational Efficiency is Percentage of Strategic Initiatives  
7 that are completed within only 50% of schedule contingency. The 5-year target is 90% of  
8 Strategic Initiatives are completed on time. The 2021 Target was that 80% of Strategic  
9 Initiatives were to be completed on time and the 2021 Result was that only 50% were.

10 Please file a table listing the 2021 Strategic Initiatives that includes the following information:

- 11 • Original 2021 schedule for each initiative including milestones  
12 • Final 2021 schedule for each initiative showing results for each milestone

13 **RESPONSE**

14 a) See response to Schedule 1 – 1.1 OEB STAFF 2(a).

**CCMBC INTERROGATORY 10**

Issue 5.0 Commitments from Previous OEB Decisions

5-CCMBC-10

**INTERROGATORY**

**Reference:** Exhibit A-2-1, page 7

**Preamble:** *"Stakeholder and community engagement is integral to the IESO's decision-making process and the goal of the process is to provide individuals and organizations with the opportunity to provide input to proposed decisions or changes that affect them. As such, the IESO uses the perspectives brought forward in this process to inform its decision making."*

Please describe ten instances where input from stakeholder engagement has caused IESO to change its initiatives, plans or processes.

**RESPONSE**

a) The following are examples of how engagement feedback has informed IESO decision-making, with links to IESO documents within the specific engagements.

Energy Efficiency Auction Pilot<sup>1</sup> – the original proposed two-year commitment period was revised to a one-year commitment period, the forward period was extended to 20 and 24 months for summer and winter resources, the original proposed reference price was revised, the auction pilot moved to a single-year commitment period, plus a number of additional changes.

Energy Efficiency Opportunities for Grid-Connected First Nation Communities<sup>2</sup> – based on feedback received through the engagement process, a survey and technical meetings, a number of challenges were identified. In the July 2021 meeting, the IESO presented the detailed program design for the First Nation Community Buildings Retrofit Program and showed how the design was informed by feedback from communities.

Energy Storage Advisory Group – Storage Design Project<sup>3</sup> – stakeholder input was used throughout the process to evolve the design proposals, and several changes were made to the Market Rule amendments based on feedback, including rewording of terms and amendments to the testing of the Operating Reserve.

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<sup>1</sup> Energy Efficiency Auction Pilot: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/eeap/eeap-20210217-final-engagement-summary-report.ashx>

<sup>2</sup> Energy Efficiency Opportunities for Grid-Connected First Nation Communities: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/eeefn/eeefn-20210916-final-engagement-summary-report.ashx>

<sup>3</sup> Energy Storage Advisory Group – Storage Design Project: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/esag/esag-20210413-final-engagement-summary-report.ashx>

1 Gas Phase-Out Impact Assessment<sup>4</sup> – feedback from a diverse group of interested  
2 participants led to the IESO to refining the scope for its assessment of phasing out  
3 natural gas generation in Ontario. The input and perspectives from those who  
4 participated allowed the IESO to carefully consider if the scope, assumptions and  
5 scenarios used in the report were appropriate and fulsome.

6 Hybrid Integration Project<sup>5</sup> – while engagement is still active on this project, early  
7 feedback has led the IESO to pursue two foundational models rather than just one as  
8 originally proposed.

9 Market Renewal Project – Energy Detailed Design<sup>6</sup> – during this engagement, the IESO  
10 worked closely with stakeholders to present the design documentation, answer  
11 questions and provide rationale. The stakeholder community came forward with well  
12 over 800 detailed and constructive comments. As per IESO practice, each of these sets  
13 of comments was published, and responded to individually, including creation of a  
14 master tracker document of all of the comments and where precisely changes were  
15 made in the detailed design documentation.

16 Reliability Standards Review<sup>7</sup> – stakeholder feedback led the IESO to undertake a review  
17 of how weather is modeled in its various demand forecasts with a commitment to share  
18 the updated methodology with stakeholders once complete. The IESO also committed to  
19 reviewing the recommendations for improving the forecasting ability for managing non-  
20 discretionary outages based on feedback on the forecasting analysis for non-  
21 discretionary outages, and the IESO updating the non-firm import capacity assumption  
22 using the most recent four years of data.

23 Updates to Performance Requirements: Market Rules 4.2 and 4.3<sup>8</sup> – changes were made  
24 to the related Market Rules and Market Manuals based on feedback from stakeholders  
25 and the Technical Panel.

26 West of London bulk planning<sup>9</sup> – in response to engagement feedback asking for greater  
27 transparency and data around the need and potential options to help the market  
28 respond, the IESO provided additional datasets around forecast load, interface data and  
29 assumptions used for resource needs/sizing.

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<sup>4</sup> Gas Phase-Out Assessment: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/qpia/qpia-20211014-response-to-feedback.ashx>

<sup>5</sup> Hybrid Integration Project: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/hip/hip-20211216-presentation.ashx>

<sup>6</sup> Market Renewal Project – Energy Detailed Design: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/market-renewal/MRP-Energy-Detailed-Design-Version-2,-d,-0-Updates.ashx>

<sup>7</sup> Reliability Standards Review: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/rsr/rsr-20210409-final-engagement-summary-report.ashx>

<sup>8</sup> Updates to Performance Requirements: Market Rules 4.2 and 4.3: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/upr/upr-20210630-final-engagement-summary-report.ashx>

<sup>9</sup> West of London Bulk Planning: [https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/southwest-ontario/WOL\\_Bulk\\_Report\\_Final\\_20210923.ashx](https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/southwest-ontario/WOL_Bulk_Report_Final_20210923.ashx)

1 Windsor-Essex regional planning<sup>10</sup> – information received about load patterns and  
2 capabilities from municipalities and local greenhouses in the Kingsville-Leamington area  
3 resulted in the IESO's targeted call for indoor agriculture GIF projects as well as the  
4 greenhouse LED lighting incentives.

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<sup>10</sup> Windsor-Essex Regional Planning: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Windsor-Essex/Windsor-Essex-IRRP-Addendum-Report.ashx>

**OEB STAFF INTERROGATORY 21**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5-Staff-21

**INTERROGATORY**

a. Exhibit D / Tab 1 / Schedule 3 / pp. 3-7

Preamble:

Table 2 at the above reference lists the ongoing and planned efforts being undertaken by the IESO to advance towards the 50<sup>th</sup> percentile of total remuneration. Table 2 organizes the ongoing and planned efforts by the following categories: Compensation, Pension, Benefits and Culture and Values.

Questions:

- a) Target area one indicates efforts related to a reduced number of Society employees compensated above a revised maximum salary range. Please indicate if the IESO has also revised the maximum salary range for non-represented/Management employees.
  - i. If applicable, please describe the revision made to the non-represented/Management employee salary range.
  - ii. If a revision to the non-represented/Management salary range has not been made, please describe the reasons for why.
- b) Target area three references Guidelines and Oversight. It describes the guidelines the IESO follows with respect to the amount of compensation that can be applied to certain hiring decisions. Exhibit D-1-3 Attachment 2 details these compensation guidelines.
  - i. Please specifically identify all revisions that have been made to the compensation guidelines shown at Exhibit D-1-3 Attachment 2 since the OEB required to IESO to bring total remuneration towards the 50<sup>th</sup> percentile in its Decision on the IESO's 2019 Revenue Requirement application.
- c) Amongst other things, Table 2 describes actions being taken by the IESO related to benefits. The actions identify specific areas of benefits-related cost savings being sought in collective agreements. Please identify the specific areas of benefits-related cost savings (including those related to pensions) being pursued related to non-Unionized/Management positions. If there are none, please explain why.

**RESPONSE**

a) The IESO has not revised the maximum salary range for non-represented Management employees.

i. This is not applicable as noted in response to a) above.

ii. The non-represented group is, on average, positioned within the competitive range on base salary, and slightly below the competitive range for total cash (includes Short Term Incentives, Long Term Incentives etc.). Revisions to the salary ranges are not required at this time.

b)

i. The following revisions were made to the IESO Compensation Guidelines, particularly to reflect arbitrated settlements and clarify existing processes:

- Clarification on how to convert the annual salary to a weekly rate for pay processing for Management/Non-Union employees.
- Direction on how to administer the Society arbitrated settlement which mandates that the minimum promotion increase for Society employees must be 3%.
- Clarification on how to administer PWU promotion increases that are less than 3%. This has been part of the Collective Agreement for some years but further clarification in the guidelines was required.

c) The Mercer Non-Executive Total Remuneration Review notes that compared to the Energy Sector peer group, the IESO, in particular the Non-Unionized/Management jobs, are generally within 1% of the market 50<sup>th</sup> percentile when considering the overall value of active benefits (including life insurance, accidental death and dismemberment, short-term disability, long term disability, health, dental and health-care spending accounts). Similarly, the IESO pension arrangement for the Non-Unionized/Management group is positioned at the 50<sup>th</sup> percentile as compared to the Energy Sector Peers. Based on those reasons, there are no reductions being pursued at this time for Non-Unionised/Management benefits or pensions.

**OEB STAFF INTERROGATORY 22**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5-Staff-22

**INTERROGATORY**

a. Exhibit D / Tab 1 / Schedule 3 / Attachment 3

Preamble:

At the above reference, the IESO provides a report entitled "Non-Executive Total Remuneration Review (Mercer Report)." The report demonstrates the movement made by the IESO towards the 50<sup>th</sup> percentile of total compensation since the last report was issued in 2018 (2018 Report).

Questions:

a) At Exhibit D-1-3, p. 3, the IESO states that:

*Mercer Canada Limited ("Mercer") was engaged to assist the IESO in conducting a Total Remuneration review for non-executives. The results from the review show positive movement towards the 50th percentile since the IESO's last review in 2018. When comparing the IESO roles to the energy sector, the IESO has improved its position as it relates to Total Remuneration by 2%. In 2018, the IESO was positioned 11% over market (50th percentile) and in 2021 is now 9% over market.*

Tables 9 and 10 have been created by OEB staff. They compare changes in total remuneration (TREM) for management, Society and PWU grade employees between the 2018 Report and the Mercer Report.

**Table 9: IESO TREM Comparison**

	<b>2018 Report</b>	<b>Mercer Report</b>	<b>Variance</b>	
	<b>IESO TREM (000)</b>	<b>IESO TREM (000)</b>	<b>\$(000)</b>	<b>%</b>
<b>Management</b>	\$187	\$203	\$16	9%
<b>Society Total</b>	\$160	\$174	\$14	9%
<b>PWU Total</b>	\$116	\$123	\$7	6%



**Table 10: Energy Sector TREM Comparison**

	<b>2018 Report</b>	<b>Mercer Report</b>	<b>Variance</b>	
	<b>Energy Sector TREM (000)</b>	<b>Energy Sector TREM (000)</b>	<b>\$(000)</b>	<b>%</b>
<b>Management</b>	\$197	\$199	\$2	1%
<b>Society Total</b>	\$139	\$156	\$17	12%
<b>PWU Total</b>	\$101	\$102	\$1	1%

As shown, results of the Mercer Report show that IESO TREM for the Management grade has increased by \$16,000, or 9% since the 2018 Report whereas the Energy Sector comparable has only increase by \$2,000, or 1%.

In response to OEB staff IR 30 (a) from the IESO's 2020/2021 Revenue Requirement proceeding, the IESO stated the following related to management staff:

*Since the OEB direction provided in the 2019 revenue requirement decision, the IESO has made a number of concessions to help work toward compensation that is at the market median.*

*For the management cadre, the IESO used the direction from the OEB to guide their annual salary increase (merit) recommendations. As such the IESO provided conservative and modest increases to the management salaries and pay bands in both 2019 and 2020 (2021 to be determined in Q1 2022).*

*In 2019, the average merit increase provided in the Energy sector was 2.9%. With the OEB decision in mind, the IESO recommended to the Board of Directors a modest merit envelope of 2%. In 2019, the IESO also recommended to the Board a nominal increase to the salary range of 1.7% which again was below the Energy sector benchmark for 2019 salary range increases.*

*In 2020, the average merit increase provided in the Energy sector was 2.2%. Again, with the OEB decision in mind, the IESO recommended to the Board of Directors a modest merit envelope of 2% again below the average merit increases in the Energy sector. In 2020, the IESO also recommended a 1.8% increase to its salary bands which was below the average increase to the ranges in the Government/Public sector average of 2% and in line with the Energy Sector average.*

The IESO stated in its response to OEB staff IR 30 a) that for the management grade, the average merit increase provided in the Energy Sector in 2019 and 2020 were 2.9% and

2.2%, respectively, and that the IESO's merit increases were set based on these amounts. However, as shown in 6, according to the Mercer Report, the Energy sector TREM for management grade employees has only increased by 1% in total since the 2018 Report was completed. Please explain how the IESO determined that the average merit increase provided in the Energy sector for 2019 and 2020 were 2.9% and 2.2%, respectively, as well as why these increases were not reflected in the Mercer Report.

b) In response to 1-Staff-13, amongst other things, the IESO was requested to calculate both "management" and "non-management regular" compensation per average capital employee in 2022 and compensation per average operations employee in 2022.

If applicable, please fully explain any variances between the average compensation calculated for both "management" and "non-management regular" employees in response to 1-Staff-13 and the TREMs shown in the Mercer Report.

## **RESPONSE**

a) The IESO determined the average merit increases provided in the Energy Sector based on survey data provided by the firms listed in Table 1 below. The listed firms were used to determine the average merit increases as well as the annual % they provided in their annual reports. These average increases were based on a point in time for which the IESO did their own independent review of the results reported by the survey companies noted below. Mercer would not have had line of sight into the IESO's review hence why it's not included in their report.

**Table 1: Survey Companies**

<b>Power/Energy/Utilities Industry</b>		
<b>Survey Company</b>	<b>2019 Average Merit Increases</b>	<b>2020 Average Merit Increases</b>
Conference Board of Canada	2.8%	2.0%
WorldatWork	3.0%	2.6%
Mercer	2.5%	2.0%
Towers Watson	3.1%	
Morneau Shepell		2.6%
Wynford		1.7%
<b>Average</b>	<b>2.9%</b>	<b>2.20%</b>

- 1       b) The compensation per average capital employee and operations employee in 2022  
2       provided in response to Schedule 1 – 1 Staff 13 from the IESO's 2020/2021 Revenue  
3       Requirement Submission, includes compensation elements not included in the Mercer  
4       Report, such as overtime, severance, and other allowances. Differences may occur as  
5       well due to Mercer using a sample of IESO staff positions versus the information  
6       provided in response to Schedule 1 – 1 Staff 13 which details the entirety of IESO's staff  
7       funded through the OEB approved Usage Fee.

**OEB STAFF INTERROGATORY 23**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5-Staff-23

**INTERROGATORY**

- a. Exhibit D / Tab 1/ Schedule 3 / Attachment 3 / p. 3 (Mercer Compensation Study)
- b. EB-2019-0002 / Exhibit C / Tab 4 / Schedule 1 / Attachment 1 / p. 3 / January 28, 2019
- c. EB-2019-0002 / Decision and Order / December 5, 2019 / p. 8

Preamble:

The Mercer Study filed in the current application notes that the IESO's positioning above the 50<sup>th</sup> percentile on a total remuneration basis is primarily a result of the high employer provided value of pension plans in place at the IESO for PWU and the Society represented jobs.

OEB staff notes that a similar finding regarding the value of pension plans was made in the prior Mercer Study submitted in the 2019 revenue requirement proceeding, which was also referenced in the OEB decision of that proceeding.

Questions:

- a) Please discuss the IESO's interpretation of the Mercer results. Specifically, given Mercer's findings in the study filed in the 2019 revenue requirement proceeding regarding the value of pension plans, are there any reasons for why the IESO has not made more progress towards bringing its compensation to the market median levels?
- b) Regarding pension and OPEB amounts, please provide an update on how the IESO is continuing its efforts to control costs in collective bargaining meetings, as well as costs applicable to management/non-union staff, including potentially increasing employee contributions.

**RESPONSE**

- a) As noted in the Mercer Study IESO Total Target Cash compensation is indeed aligned with the 50<sup>th</sup> percentile for the Energy Sector (within 1%). The IESO continues to include cost reductions for both pensions and benefits in the IESO Management mandates. The IESO also puts forward pension and benefit bargaining items each of the negotiations with our Union but it can be difficult to gain agreement on these items in bargaining.

- 1 b) Similar to the response to a), the IESO continues to include cost containment items in
- 2 each bargaining mandate which include the reduction of the indexation as well as
- 3 increased employee contributions. These continue to be ongoing bargaining/mandate
- 4 items but it can be difficult to gain agreement on these items.

1 **AMPCO INTERROGATORY 18**

2 Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous  
3 proceedings?

4 5.1-AMPCO-18

5 **INTERROGATORY**

6

7 The IESO updated the IESO Grid Innovation Fund, Conservation Fund and Technology  
8 Development Fund Project Portfolio spreadsheet in response to the EB-2020-0230 Settlement  
9 Agreement.

10 Please provide the IESO's proposed schedule to update the spreadsheet publicly

11 **RESPONSE**

12 a) The IESO updates the spreadsheet publicly after contracts are signed and  
13 announcements are made with successful proponents. This typically occurs on an annual  
14 basis.

**CME INTERROGATORY 5**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5.1-CME-5

**INTERROGATORY**

**Ref: Exhibit D, Tab 1, Schedule 3, p. 3 of 7**

At p. 3, the IESO provides a table showing the ongoing and planned efforts to make progress towards the 50th percentile for total remuneration.

- a) Please provide the IESO's view of whether or not rapid inflation in Ontario will make the IESO's work to progress towards the 50th percentile for remuneration easier or more difficult. Please explain fully.

**RESPONSE**

- a) With the wage restriction (Bill 124, *Protecting a Sustainable Public Sector for Future Generations Act, 2019*) in place and given that all the organizations that are part of the benchmarking survey are affected by the rise in inflation, the IESO does not believe that this rise in inflation will affect progress towards the 50<sup>th</sup> percentile for remuneration.

**OSEA INTERROGATORY 5**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

**5-OSEA-5**

**INTERROGATORY**

*Reference:* Exhibit G-1-1, Attachment 1

*Preamble:* In the OEB approved settlement proposal as part of the OEB's Decision and Order in EB-2020-0230, the IESO made the following commitment related to the public availability of planning data "With respect to IESO's planning activities, the IESO commits to increase the public availability of planning data". OSEA is interested in the progress and work plan for continuing the accessibility of planning data.

Questions:

- a) Please provide a summary of the IESO's vision and strategy for meeting the commitment to increase public availability of planning data.
- b) Has the IESO developed a strategy and framework to measure the objective and success measures for sharing planning data publicly?
  - i. If so, please provide documentation and supporting analysis used to develop the framework and justify the approach.
  - ii. If no strategy or framework has been established, please explain how the IESO intends to determine if the commitment in the settlement agreement has been met.
- c) Please provide a summary of capital expenditures related to supporting the commitment for increasing public availability of planning data, including funding commitments along with explanation and justification for capital expenditures.
- d) Please provide a summary of operating expenditures related to supporting the commitment for increasing public availability of planning data, including funding commitments along with explanation and justification for operating expenditures.
- e) The IESO provided an example of enhanced planning data related to the West of London information sharing summary. Please provide a list of all other information sharing summaries that meet or exceed the information provided in the West of London example (e.g., other bulk system planning areas where information has been shared or is intended to be shared). If no other summaries exist, please explain why the IESO has not made efforts to share more such enhanced planning data.
- f) Has the IESO considered create a centralized repository for planning data for stakeholders and rate-payers to access for information on system needs and plans? If no centralized data repository has been considered, please explain why.



**RESPONSE**

- a) The IESO's approach to date for increasing availability of planning data has centred around continuous improvement and responding to stakeholder feedback. For instance, the IESO responded to stakeholder feedback for additional data in the West of London bulk plan by engaging on a proposed data set, providing the data, and then carrying forward the additional data in future plans as the new baseline for what data is made publicly available. The IESO has also communicated to stakeholders' process changes that will improve data availability and sought their feedback. This communication occurred during the bulk and regional planning process webinar held on October 19, 2021, for both process improvements related to identification of non-wires alternatives<sup>1</sup> in regional planning and the formalization of the bulk planning process<sup>2</sup>.
- b) The IESO utilizes our established engagement processes as the main input to assess if we are being sufficiently transparent and to drive associated improvement to data availability. This ensures a broad group of stakeholders, including those in the area impacted by the plan, can effectively provide input on the data, and format, they feel is most valuable. The IESO carries out continuous engagement on both its plan and process development and welcomes and responds to feedback received through these forums, as noted for the West of London Bulk Plan. The IESO has also more broadly implemented this feedback by applying the new "baseline" level of data availability established in the West of London Bulk plan to all plans going forward – where those data sets are applicable to the needs and alternatives studied in the plan. The improvements achieved with this approach, and the IESO's intention to continue to consider future feedback on any additional improvements, meet the intention of the obligation the IESO made. The RPPAG working group has provided recommendations to the OEB that have been accepted, which may result in changes to the IESO's licence regarding data sharing. The IESO will assess these changes once they have been defined.
- c) In 2022, there were no capital expenditures related to supporting the commitment for increasing public availability of planning data. For 2022, the work to support increasing the availability of planning data is currently being performed within the existing budget and resources of the business unit for core work. Therefore, a summary of expenditures is not available, as the IESO does not perform activity-based accounting.
- d) Additional plans completed since the West of London bulk plan have shared planning data in the same format, as applicable based on the needs and options being identified. As well, plans that have been recently initiated have provided greater granularity of planning data earlier in the process, opposed to only in the appendices of the final document, in accordance with the process changes outlined in the October 19, 2021

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<sup>1</sup> Non Wires Alternatives: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/derr/derr-20211019-presentation.ashx>

<sup>2</sup> Bulk Planning Process: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/bspp/bspp-20211019-presentation.ashx>

planning process webinar. Table 1 below summarizes planning data shared since the West of London bulk plan was completed in September 2021.<sup>3</sup>

**Table 1: Planning Data Shared Since the West of London Bulk Plan**

<b>Plan (Regional/Bulk)</b>	<b>Plan Publication</b>	<b>Detailed Data Table(s) Shared Throughout Process</b>	<b>Detailed Data Table Appendix, Economic Assumptions</b>
Peterborough to Kingston IRRP (Regional)	November 5, 2021		Data Tables: <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Peterborough-to-Kingston/p2k-bulk-appendices-20211105.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Peterborough-to-Kingston/p2k-bulk-appendices-20211105.ashx</a>  Economic Evaluation Assumptions (p 32): <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Peterborough-to-Kingston/p2k-IRR-Appendices-20211104.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Peterborough-to-Kingston/p2k-IRR-Appendices-20211104.ashx</a>
Windsor-Essex IRRP Addendum (Regional)	February 10, 2022		Data Tables: <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Windsor-Essex/Windsor-Essex-IRR-Addendum-">https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Windsor-Essex/Windsor-Essex-IRR-Addendum-</a>

<sup>3</sup> Table summarizes location of incremental data sets for each plan. A subset of the data provided for the West of London plan has traditionally been provided in every plan (i.e. transmission interface capabilities) and can be found in the finalized plan document itself and is not listed here.

			<a href="#">Appendices-20220210.ashx</a>  Economic Evaluation Assumption: N/A, no non-wires alternative was fully costed as part of the analysis. Economic evaluation was limited to capital cost comparison of wires alternatives.
Northwest IRRP (Regional)	Ongoing	Draft demand forecast & historical load profiles:  <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Northwest-Ontario/nw-ontario-20220425-draft-demand-forecast-and-load-profiles.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/regional-planning/Northwest-Ontario/nw-ontario-20220425-draft-demand-forecast-and-load-profiles.ashx</a>	
Niagara IRRP (Regional)	Ongoing	Draft demand forecast: <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/Niagara/Niagara-IRRP-Draft-Load-Forecast.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/Niagara/Niagara-IRRP-Draft-Load-Forecast.ashx</a>  Hourly need forecast: <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/Niagara/Niagara-IRRP-Draft-Load-Forecast.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/Niagara/Niagara-IRRP-Draft-Load-Forecast.ashx</a>	

		<a href="#">Library/engage/Niagara/Niagara-IRRP-Draft-Hourly-Load-Forecast-Public.ashx</a>	
Renfrew IRRP (Regional)	Ongoing	Draft demand forecast:  <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/Renfrew/Renfrew-IRRP-Draft-Load-Forecast.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/Renfrew/Renfrew-IRRP-Draft-Load-Forecast.ashx</a>	
North and East of Sudbury IRRP (Regional)	Ongoing	Draft demand forecast:  <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/ne-sudbury/ne-sudbury-draft-load-forecast.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/ne-sudbury/ne-sudbury-draft-load-forecast.ashx</a>	

- 1
- 2
- 3 e) The IESO continues to investigate opportunities to improve access to planning data in
- 4 future years, including opportunities to provide data in a more centralized manner. Any
- 5 evolution or additions to the IESO's current approach will be communicated and
- 6 stakeholdered through stakeholder engagement with opportunities for feedback. As part
- 7 of considering implementation of further improvements to data availability, either as
- 8 identified through the engagement process or in implementing future changes that may
- 9 be required to meet the recommendations outlined in the RPPAG's recommendations
- 10 once they have been defined, the IESO will also need to assess any additional resources
- or expenditure that may be required to produce or host the data.

**PWU INTERROGATORY 7**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5-PWU-7

**INTERROGATORY**

Ref: Exhibit G/Tab 1/Schedule 1/P. 6

The reference indicates that as per the Settlement Agreement in EB-2020-0230, the parties agreed to defer consideration of the proposed procurement registration fee until after the IESO had developed a more detailed fee structure and completed its related stakeholder engagement efforts and that the IESO held the stakeholder consultation session on November 23, 2021.

Question:

- a) When does the IESO expect to complete the stakeholder consultations on the issue and does the IESO anticipate requesting registration fee for electricity supply and capacity procurements in its next revenue requirements application?

**RESPONSE**

- a) The IESO has concluded stakeholder engagement on proposed registration fees for upcoming procurements, including the Long-Term RFP. Per the 2020-2022 settlement agreement (EB-2020-0230) with the OEB and intervenors, the IESO conducted additional stakeholder engagement on a more detailed fee setting framework, including information on the cost of past IESO procurements and the fees collected. The IESO held the stakeholder consultation session on November 23, 2021. In light of stakeholder feedback, and the time that would be required to continue to consult on that feedback, the IESO concluded that there was insufficient time to move forward with a change to the registration fee and to have the new fee in effect in advance of procurement initiatives directed by the Minister of Energy on January 28, 2022. As such, the IESO withdrew its request for OEB approval to charge registration fees of up to \$50,000 per proposal for electricity supply and capacity procurements, including ancillary services. The OEB accepted the IESO's request to withdraw the request increase to the registration fee. The IESO does not anticipate requesting an increase in its registration fee for procurements in the next revenue requirement submission. The IESO will move forward with its planned procurements using previously approved registration fees of up to \$10,000 per submission for electricity supply and capacity procurements, including ancillary services.

1 **SEC INTERROGATORY 17**

2 Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous  
3 proceedings?

4 5.1-SEC-17

5 **INTERROGATORY**

6 [G-1-1, p.3] With respect to IESO's response to previous OEB decisions, please explain why the  
7 updated IESO Grid Innovation Fund, Conservation Fund and Technology Development Fund  
8 Project Portfolio spreadsheet, only included projects up until 2019.

9 **RESPONSE**

10 a) The portfolio list is updated and includes all contracted projects up until 2021. The  
11 updated link is: [https://www.ieso.ca/-/media/Files/IESO/Document-Library/funding/Grid-](https://www.ieso.ca/-/media/Files/IESO/Document-Library/funding/Grid-Innovation-Fund/GIF-Portfolio-2005-2021.ashx)  
12 [Innovation-Fund/GIF-Portfolio-2005-2021.ashx](https://www.ieso.ca/-/media/Files/IESO/Document-Library/funding/Grid-Innovation-Fund/GIF-Portfolio-2005-2021.ashx).

1 **SEC INTERROGATORY 18**

2 Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous  
3 proceedings?

4 5.1-SEC-18

5 **INTERROGATORY**

6 [G-1-1, Attach 3, p.5] Please provide a full copy of the Project Management internal audit.

7 **RESPONSE**

8 a) In the OEB's Decision and Order in EB-2020-0230, the OEB approved the settlement  
9 proposal in which the IESO made the following commitment related to internal audits:  
10 "With respect to internal audits, the IESO will provide the following information in the  
11 next Revenue Requirement Submission, in line with the findings of the OEB in its Motion  
12 Decision in EB-2013-0326, dated July 24, 2014: The details of the subject matter of the  
13 Audit Reports, the recommendations, the action(s) taken as a result of each  
14 recommendation, and the status of the implementation of that action. The information  
15 should be clear and comprehensive."

16 The IESO has provided the required information in Exhibit G-1-1 Attachment 3 – Details  
17 of Internal Audit Reports, pg. 5. Nevertheless, in an effort to advance the proceeding  
18 and continue with the Settlement Conference as scheduled, the IESO will provide a copy  
19 of the Project Management Internal Audit Report. See Attachment 1 to this Exhibit.

# Project Management Audit

## Internal Audit Report

**AUGUST 4, 2021**

2114  
IESO Confidential



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## Internal Audit Mission Statement

The IESO Internal Audit function is committed to being a high value, cost-effective contributor to the overall business success of the IESO. Internal Audit provides independent, objective services on risk management, controls, and governance processes to management and to the Audit Committee of the Board of Directors.

Audits are conducted in conformance with the International Standards for the Professional Practice of Internal Auditing.

## Notice of Confidentiality

This report is confidential and intended to be solely for the benefit of IESO Management, including the Enterprise Risk Management function, and the Audit Committee of the Board of Directors and not for the benefit of any other person. This report should not be used for any other purpose and should not be quoted, in whole or in part, or otherwise referred to or used for any purpose without the IESO's prior written consent. Any use of this report by a third party, or any reliance or decisions made based on it, are the sole responsibility of such third party. We do not accept any responsibility for any loss or damage incurred by any third party as a result of decisions made or actions taken based on this report.

# Executive Summary

Internal Audit has performed an audit on the project management processes that are carried out by the Project Management Office and Change Delivery teams within the Enterprise Change (EC) group.

The EC group was created in November 2017 as the IESO's centralized team responsible for the prioritization, governance and delivery of enterprise change at the IESO and ensuring that projects achieve their objectives. At the IESO, a project is defined as a temporary endeavour to carry out changes to the people, process and technology which impacts more than one business unit (including I&TS). The 2021 project portfolio roadmap includes 37 projects in various stages.

Since the new project management processes introduced as part of the centralized delivery function under Enterprise Change have never been audited before, this review was included in the 2021 annual internal audit plan. The relative priority of this audit is **high**. Priority is relative to other processes in the approved Internal Audit Services Plan.

The objective of this engagement was to provide reasonable assurance that the program and project management framework is suitably designed and operating effectively.

The scope of this review includes the following project management processes and activities within the Portfolio and Project Management Life Cycle (PPMLC) employed to meet business objectives:

- Initiating processes – to define objectives of a new project or new phase of an existing project and obtain authorization to start the project and/or phase;
- Planning processes – to establish scope of the project, refine business objectives, and define the course of action required to achieve these;
- Executing processes – to perform the work defined in the integrated project plan (IPP) and project charter;
- Monitoring and controlling processes – to track, review, and regulate the progress and performance of the project, identify changes required to the IPP and carry out activities to effect these changes; and
- Closing processes – to formally close the project and capture lessons learned.

The following were excluded from the review:

- Project Inception phase that includes activities to review submission of project, consolidation into a portfolio for ELT review and approval and reflect project's capital and operating budget in the business plan.
- Organizational change management resulting from a project.

- Solution Development Life Cycle (SDLC) or similar approaches used for delivery of product and systems.
- Measurement of business value delivery after project completion.

## Approach

We performed audit procedures and assessed controls based on the Standard for Project Management (ANSI/PMI 99-001-2017) and components of the Project Management Body of Knowledge (PMBOK). Our assessment was based on virtual interviews and walkthroughs with key personnel in the Enterprise Change group as well as review of governing documents and supporting operational information provided to us by teams that were part of virtual interviews and walkthroughs.

## Conclusion

Enterprise Change has adopted industry best practices in its governance, controls, change management and delivery methodologies including a framework for project management<sup>1</sup>. The PPMLC was implemented by EC in 2019 as a result of stakeholder feedback and a maturity assessment performed by the external consultant (MNP) in 2018. The PPMLC is designed using guiding principles of the PMI Standard for Project Management.

Internal Audit made 6 medium and 3 low observations. The medium findings included inconsistent practice around project risk management, limitations in use of resource planning and project scheduling tools, and lack of a central, integrated tool set to manage all aspects of the project.

Internal Audit (IA) appreciates the co-operation, open communication and timely information from staff and management in the Enterprise Change group. Management has collaborated with IA to develop management action plans and timelines to help mitigate risks that may lead to errors, negligence and inefficiencies in the Project Management process. Management has also provided additional context and background to some of the audit observations to describe existing processes and support their management action plans.

The following sections of this report contains, a [Summary of Observations](#), high and medium rated audit results are noted in the [Observations, Recommendations, Management Response and Action Plans](#) section, whereas low rated observations and opportunities for improvement are listed in the [Appendix A](#).

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<sup>1</sup> The Project Management Institute Standard 99-001-2017 defines Project Management as the application of knowledge, skills, tools and techniques to project activities to meet project requirements.

## Summary of Observations

Control Objective	Assessment of Design and Operating Effectiveness
A project charter is developed to formally authorize the start of the project and provide the authority to apply organizational resources to project activities.	No observations noted.
Stakeholders for the project are identified and their interests, dependencies, involvement and impact is analyzed and documented.	1 medium risk observation noted.
An integrated project plan is prepared that defines the basis of all project work and how the work will be performed.	No observations noted.
Business objectives are determined and documented in the project charter that helps to define the project scope.	No observations noted.
A project schedule is developed, documented and analyzed with planned dates for completing project activities and is used for executing, monitoring and controlling the project.	1 medium risk observation noted.
Monetary resources needed to complete project work are estimated to establish an authorized cost baseline against which project performance can be monitored and controlled.	No observations noted.
A quality management plan is prepared to provide guidance and direction on how quality will be managed and verified throughout the project.	No observations noted.
A resource management plan is developed to estimate, acquire, manage and utilize physical and team resources to help establish the approach and level of management efforts needed for managing project resources.	1 low risk improvement opportunity noted.
The approach for communication is documented to efficiently and effectively engage stakeholders by presenting relevant information in a timely manner; and the project information is communicated efficiently and effectively between the project team and stakeholders.	1 medium risk observation and 1 low risk improvement opportunity noted.

Control Objective	Assessment of Design and Operating Effectiveness
<p>A plan for project risk management is developed to identify project risks and sources of risk, and that the degree, type and visibility of risk management are appropriate to both the risk and the importance of project to the organization and other stakeholders.</p> <p>The agreed upon project risk responses are implemented and monitored as well as new risks and risk responses are identified and implemented as applicable.</p>	1 medium risk observation noted.
<p>Leading the work defined in the integrated project plan including overall management of the project work and deliverables to ensure the project progresses according to plan and where changes are required these are authorized and implemented in a timely manner.</p>	No observations noted.
<p>Assessment and improvements are made to enhance team members' competencies, interactions, interpersonal skills and overall team environment that result in motivated employees, reduced attrition and improved overall project performance.</p>	1 low risk improvement opportunity noted.
<p>Resources including team members, facilities, equipment etc. are acquired and assigned appropriately.</p>	1 medium risk observation noted.
<p>The project's overall progress is tracked, reviewed and reported to inform stakeholders of the current state of the project, any actions taken to address performance issues and any impacts to the project schedule and cost.</p>	1 medium risk observation noted.
<p>All project activities ensure that planned work is complete, project information is appropriately stored/archived and organizational resources are released.</p>	1 low risk improvement opportunity noted.

## Observations, Recommendations, Management Response and Action Plan

Please note that the indicated risk of audit observations is an assessment of relative risk measured in relation to other audit findings. This is not an absolute assessment of risk to the IESO and is a relative assessment of where management needs to focus their attention in order to meet defined process and control objectives. The following table describes the risk levels as used in this report:

High (requires immediate action)	Likely to affect the IESO's ability to achieve the Project Management process objectives.
Medium (due course)	<p>Somewhat likely to affect the IESO's ability to achieve the Project Management process objectives.</p> <p>Where compensating controls exist, they are assessed to partially mitigate the identified risk.</p>
Low/Improvement Opportunity (recommended)	Unlikely to affect the IESO's ability to achieve the Project Management process and control objectives. Opportunity exists to improve the efficiency and effectiveness of the process.

Significant (high and medium risk) observations, recommendations, management response and action plans are summarized below, whereas the low risk observations and opportunities for improvement including management response and action plans are listed in the Appendix A.

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
<p>Control Objectives: A plan for project risk management is developed to identify project risks and sources of risk, and that the degree, type and visibility of risk management are appropriate to both the risk and the importance of project to the organization and other stakeholders;</p> <p>Appropriate risk responses are identified, agreed upon and implemented to minimize project threats and maximize project opportunities; and monitored as well as new risks and risk responses are identified and implemented as applicable.</p>					
1	<p><i>Observation and Implications</i></p> <p>For all 9 projects in the audit sample, we obtained and reviewed the risk registers that existed for each project (Risks, Actions, Issues, Decisions, Change Requests – “RAIDC” document) and noted the following:</p> <ul style="list-style-type: none"> <li>• Risks statements and mitigation actions are not drafted consistently between projects;</li> <li>• Risk registers are not reviewed during PSC meetings, for the 5 PSC meetings attended no discussion took place whether any new risk was identified or if any mitigation effort was required; and</li> <li>• Although risk registers are maintained, we could not determine if mitigation plans are reviewed and updated on a regular basis.</li> </ul> <p>In the absence of proper identification and mitigation of project risks, there may not be proactive management of project risks and the project progress may be negatively impacted creating delays and/or cost overruns or delivery of solutions that does not fully meet the business objectives.</p> <p><i>Recommendations</i></p> <p>It is recommended that management,</p>				Medium



No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
				<p>1.1. Enhance the project risk assessment process by standardizing project risk statements and mitigation actions that are similar within projects by type and size, a sample project risk universe is provided with this report and provide training to PMs to ensure that they have a common understanding of our risk management process, including the definition of a risk, contributing factor, control, mitigation plan;</p> <p>1.2. Work with ERM group to ensure the project risk assessment process is aligned with the Enterprise Risk Management process and to ensure that project risks are elevated at the enterprise level as applicable; and</p> <p>1.3. Maintain evidence that risk responses and mitigation efforts are reviewed and updated in a timely manner by the respective stakeholders.</p> <p>1.4. Bring additional profile of critical and high residual risks at Project Steering Committee and project team meetings to ensure that team members are aware of existing and emerging key project risks and how they are being managed.</p> <p><i>Management Response and Action plan</i></p> <p>Enterprise Change Management agrees that the project risk assessment, monitoring, mitigation and reporting can be further enhanced to bring more consistency across our projects and agrees that the adoption of standardized risk statements that can be considered for all projects would be helpful to bring this consistency. In fact, we are working with ERM to standardize risk statements and develop a risk glossary. We also agree that risks should be reviewed on a regular basis throughout the project and that more visibility should be brought to Project Steering Committee and project team members.</p>	

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
		<p>Enterprise Change has been working with the Enterprise Risk Management function for well over a year to better align our risk management practices, terminology and assessments. We updated our Project Risk Management Methodology (IESO_PRO-071) in December 2020 with input from the ERM team, we have updated the RAIDC log to be consistent with the new ERM tool and in addition to MRP and RSS we have two projects (DLRT and IESO Hub) that are piloting the new ERM tool with the expectation that we will manage risks for all new projects through the tool once we determine of how effective the tool can support project risks. This will also help ensure that we elevate project risks to the enterprise level, as appropriate. In 2021 the Project Management Office and ERM teams delivered joint training to Change Delivery team members on the changes to the project risk management tools and procedures.</p> <p>Enterprise Change management agree to further enhance our project risk management practices through the following:</p> <ul style="list-style-type: none"> <li>• Complete work with Enterprise Risk Management to define a number of standard risk statements that will be assessed for all projects – <b>December 31, 2021.</b></li> <li>• Develop protocols, such as time stamping RAIDC logs or to develop risk counts, to clearly indicate when risk logs have been updated with new or modified risks, mitigation plans have been implemented and when risks have been closed – <b>October 31, 2021.</b></li> <li>• Reinforce with Project Managers that risk logs should be reviewed with project team members and Project Steering Committees on a regular basis, no less frequently than quarterly – <b>August 31, 2021.</b></li> </ul> <p><i>Completion Dates noted above.</i></p>			

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
Control Objectives: A project schedule is developed, documented and analyzed with planned dates for completing project activities and is used for executing, monitoring and controlling the project.					
2		<p><i>Observation and Implications</i></p> <p>We obtained the project schedules from the project folders located on [REDACTED] network drive (available as a public document) as well as part of attendance at 6 PSC meetings and noted the following:</p> <ul style="list-style-type: none"> <li>For 5 out of 9 projects in the sample selected for audit testing, the project schedules were stored in MS Project file format (.mpp). This format is unreadable for staff that do not have access to MS-Project; since licenses for MS project are not widely made available to staff. This means that many staff do not have the ability to read the status of specific project activities and tasks in real time to note and make corrections in the event a delay becomes likely related to a task or activity, or conflicts in interdependencies between projects where resources are shared;</li> <li>Additionally, the project schedule is required to be provided via a live link in the monthly progress report to the Project Steering Committee (PSC). However, We noted that project schedule links for 3 out of the 5 progress reports were not readable due to restriction of MS Project file format.</li> </ul> <p>It is understood that key milestone activities and associated timelines for the current period are clearly stated on the project progress reports and communicated by the project manager at the monthly PSC meetings.</p> <p>In the absence of a project schedule that is made available to project team and PSC members there is a potential that delays or interdependencies in various project tasks may not be known in a timely manner to make decisions to maintain the project schedule.</p>			Medium

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
				<p><i>Recommendation</i></p> <p>The project schedule should be available in the project repository, in a consistent spot, saved in both MS project and PDF. This ensures that most current version of project schedule in pdf format is available for review and action for stakeholders, project team and PSC members to facilitate timely and accurate information for decision making.</p> <p><i>Management Response and Action plan</i></p> <p>Enterprise Change Management agrees with the observation and associated recommendation. It is the intent that all schedules be maintained in the project folder on [REDACTED] and be saved in both a MSProject and PDF format. The link in the Progress Report should use the PDF version of the schedule.</p> <p>We will work with Project Managers in order to reinforce the need to maintain the project schedules in PDF format and link these to the Progress Report.</p> <p><i>Completion Date</i></p> <p>August 31, 2021</p>	

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
Control Objective: Stakeholders for the project are identified and their interests, dependencies, involvement and impact is analyzed and documented.					
3	<p><i>Observation and Implications</i></p> <p>We did not find stakeholder registers for 8 out of 9 projects in the audit sample (1 project in the execution stage had a stakeholder register), 2 out of the 9 projects were in the initiation and planning stage at the beginning of audit testing in May 2021.</p> <p>Based on discussions with the project managers and review of Portfolio and Project Management Life Cycle document (PPMLC) it is understood that current project management practice has started to evolve, whereby stakeholders will be identified early in the process. This would be captured in a Stakeholder Management Plan as per the PPMLC framework.</p> <p>Without the engagement and input from stakeholders in the early stages of project, there is a potential that the proposed IT tools may be implemented that does not meet stakeholder expectations/requirements and business objectives. It is also possible that indirect stakeholders, if not informed, will be negatively impacted by unexpected change.</p> <p><i>Recommendation</i></p> <p>It is recommended that management continue to develop and implement a stakeholder engagement process as already identified part of PPMLC framework. For each project, a stakeholder list should be maintained to allow for ease of updates as and when staff and management leaves or changes their position.</p>				Medium

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
				<p><i>Management Response and Action plan</i></p> <p>Enterprise Change management agrees that it is critical to identify and engage stakeholders early in the project life cycle. As such, the initial version of the Project Charter developed in the Initiation Phase of the project identifies the key stakeholders for the project and how they are affected or how they are participating in the project. (Section 4 of the Project Charter).</p> <p>The list of stakeholders is further refined in the Planning Phase and captures as part of the IPP. It is not our standard practice to develop a "Stakeholder Register" but this may be done based on the nature of the project and the complexity of the stakeholder management plan. In response to the recommendation, we will reinforce with the project team members the importance of early identification and engagement of key stakeholders and the need to maintain a current list of stakeholders as the project continues.</p> <p><i>Completion Date</i></p> <p>August 31, 2021</p>	

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
Control Objective: Resources including team members, facilities, equipment etc. are acquired and assigned appropriately.					
4		<p><i>Observation and Implications</i></p> <p>We obtained and reviewed the project resource allocation file that is updated by project managers (PMs) for their projects on a monthly basis. Our review of the resource allocation file noted the following:</p> <ul style="list-style-type: none"> <li>• It is the responsibility of resource managers (RMs) to allocate their team members to a project. PMs and RMs meet as needed, to review the allocated resources. PMs make updates to the resource allocation file and RMs can view the resource allocation file on the HUB but do not have access to make changes at this time; this is a control to maintain data integrity of this file. By not having the ability to update the resource allocation file in real-time, the RMs cannot easily re-allocate resources when there are tight schedules and also cannot monitor in a timely manner whether staff time is allocated appropriately between project/s and regular work duties;</li> <li>• Many team members (resources) are shown as deployed for more than their full time hours, it cannot be determined from the file whether resource managers are aware of this and what steps were taken to address the over allocated staff time, e.g. bringing on additional resources or cutting back work; and</li> <li>• There are no mandatory input controls to ensure resource names are added only once. As well, in many instances multiple names were grouped as one resource, this makes it difficult to trace to a specific resource manager for appropriate assignment and monitoring to ensure resources remains available to the project.</li> </ul> <p>In the absence of read/write access by RMs, documentation of resolution of over-allocated staff and input controls, there is a potential that resources may not be assigned and monitored appropriately by resource managers and therefore negatively impacting the project health.</p>			Medium

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
			<p><i>Recommendations</i></p> <p>It is recommended that management continue to investigate the feasibility of a tool that manages resources at the corporate level including allocation to projects. In order to provide further efficiencies in the process, this tool should be integrated or have the ability to have a direct interface for capturing actual labour costs as these are coded into Kronos on a bi-weekly reporting cycle by all IESO employees.</p> <p>In the interim of the tool being implemented, project managers should seek confirmation from resource managers that they have reviewed the resource allocation file and whether or not changes to allocated resources are required. This confirmation should be retained in project files.</p> <p><i>Management Response and Action plan</i></p> <p>Enterprise Change management agrees that there are a number of limitations associated with the current Excel based tool that would be more readily addressed by a third party off-the-shelf product. A third party product would also allow us to more readily integrate with our time reporting and financial systems and have different levels of user access for Resource Managers, Project Managers and administrators such as the PMO. We have identified such a need as part of business planning, however due to higher priority work, we do not expect to undertake a project to replace the current Excel tool <b>until 2023</b>. In the meantime we will implement more formal controls to ensure that Project Managers are verifying resource allocation with Resource Managers and either resolving resource constraints or adjusting the project schedule to reflect the constraints and noting these agreements in the project files.</p> <p><i>Completion Date</i></p> <p>October 31, 2021</p>		



No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
Control Objective: The project's overall progress is tracked, reviewed and reported to inform stakeholders of the current state of the project, any actions taken to address performance issues and any impacts to the project schedule and cost.					
5	<p><i>Observation and Implications</i></p> <p>The project managers track and update project progress on a monthly basis through multiple tools that do not interface and are not linked to each other. Use of multiple tools that are not integrated is time consuming as data is keyed manually and End User Computing Tools (EUCT) are prone to errors if proper controls are not built. These tools include,</p> <ul style="list-style-type: none"> <li>• MS Schedule for planning and tracking completion of project tasks and activities</li> <li>• Resource Allocation (EUCT) file for labour hours and costs</li> <li>• Eclipse tool for overall portfolio management, project health, KPI and project dashboard reporting</li> <li>• Excel based Cost Tracker (EUCT) tool for tracking project budget and actual costs</li> <li>• MS Teams and Outlook for collaboration with project team and PSC members</li> <li>• [REDACTED] and [REDACTED] for storing and archival of project documentation and records</li> </ul> <p><i>Recommendation</i></p>				Medium

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
		<p>It is recommended that management investigate the feasibility and benefit of acquiring a project management tool to streamline the project tracking, monitoring and reporting process. Where possible, existing IESO tools may be put to use with additional training to project team members. Further efficiencies and savings may be had by combining the functionality of resource planning, allocation and capturing actual costs discussed in the audit observation #4 above.</p> <p><i>Management Response and Action plan</i></p> <p>Similar to Observation #4, Enterprise Change management agrees that there are a number of limitations associated with the current suite of tools used to manage the overall portfolio and individual projects and recognize there would be additional efficiencies and more automated controls through the implementation of such a tool. A more integrated third party product would allow us to more readily integrate with our time reporting and financial systems and have resource management capability to address the observations captured in observation #4. We have identified such a need as part of business planning, however due to higher priority work, we do not expect to undertake a project to replace the current tools <b>until 2023</b>.</p> <p><i>Completion Date</i></p> <p>2023</p>			

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
<p>Control Objective: The approach for communication is documented to efficiently and effectively engage stakeholders by presenting relevant information in a timely manner.</p> <p>The project information is communicated efficiently and effectively between the project team and stakeholders.</p>					
6	<p><i>Observation and Implications</i></p> <p>As part of the audit procedure we attended and observed PSC meetings for 5 projects, and noted that many PSC members participated with their camera turned off for the entire duration of the meeting. The PM spoke to the agenda items and many times there were no questions or discussions, it appeared as though the PSC members were not engaged.</p> <p>The following is an excerpt from the Project Roles and Responsibilities document outlining the role of a PSC member:</p> <ul style="list-style-type: none"><li>• Reviews materials ahead of PSC meetings and is prepared to ask questions, engage in discussion and provide <i>direction to the project team</i>;</li><li>• Empowers the program/project manager and the project team to do their job.</li></ul> <p><i>Recommendations</i></p> <p>It is recommended that Enterprise Change management,</p> <ul style="list-style-type: none"><li>• Determine if and when project steering committees are necessary, and if necessary what an appropriate meeting cadance is for each project type;</li></ul>				Medium

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
		<ul style="list-style-type: none"> <li>Review the Project Roles and Responsibilities document outlining the role of a PSC member and revise it to further clarify meeting etiquette of members;</li> <li>As discussed in Appendix A – Observation #4 below, further develop the soft skills of PMs to ensure that they effectively engage all PSC members and ensure effective collaboration.</li> </ul> <p><i>Management Response and Action plan</i></p> <p>Enterprise Change management agrees that engaged stakeholders are critical to the success of any project and that Project Steering Committee members are key stakeholders. Although each project is required to prepare and issue a monthly progress report to the Project Sponsor and Steering Committee members there is discretion regarding the need to hold a formal Project Steering Committee meeting and their cadence. This would typically be agreed to between the Project Sponsor and the Project Manager during the Initiation Phase of the project. Also Project Managers have the discretion to cancel a scheduled meeting if there are no notable updates or decision items. We will reinforce this level of discretion with Project Managers and Project Sponsors – <b>October 31, 2021.</b></p> <p>The Project Roles and Responsibility document describes the various roles that may be assigned to a project based on size and complexity. The document should be used during the initiation of a project to identify the various roles that may need to be leveraged based on the scope and complexity of a project. The document helps the project team gain a common understanding of each of the roles to ensure there are no gaps or overlaps in the team member responsibilities. The document is not intended to get into administrative details for how meetings should be conducted. This would be better captured in either the PSC Operating Procedures. We will however further reinforce with Project Managers and Project Sponsors the importance of active participation in the meeting and strongly encourage being on camera for virtual meetings – <b>August 31, 2021.</b></p>			

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plans	Relative Risk
	<p>Enterprise Change has focused our training over the past year or so on how to hold effective meetings, facilitation and other leadership soft skills. We will ensure that we continue to coach our staff to leverage these skills more effectively by providing timely feedback. Where these skills need further development we will provide additional training opportunities either as a team or individually.</p> <p><i>Completion Dates noted above.</i></p>				

# About the Review

## Audit Team and Key Internal Resources

### Internal Audit Team

Julia McNally	<i>Director, Internal Audit</i>
Archana Gupta	<i>Senior Auditor</i>

### Key Internal Resources

Barbara Anderson	<i>Vice President, Corporate Services and CFO</i>
Nicholas Ingman	<i>Director, Enterprise Change</i>
Daniela Sabatini	<i>Senior Project &amp; Portfolio Manager, Change Delivery</i>
Anil Agrawal	<i>Supervisor, Project Management Office</i>

## Appendix A – Low Risk (Opportunities for Improvement) Observations, Implications and Recommendations

The following table summarizes the low risk observations for management's consideration for enhancing the efficiency and effectiveness of processes and controls. Low risk observations are unlikely to affect the IESO's ability to meet defined process and control objectives.

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
Control Objective: A resource management plan is developed to estimate, acquire, manage and utilize physical and team resources to help establish the approach and level of management efforts needed for managing project resources; and resources including team members, facilities, equipment etc. are acquired and assigned appropriately.					
1	<p><i>Observation and Implications</i></p> <p>We reviewed the Project Roles and Responsibilities document that serves as a guideline to ensure that various roles for the projects selected in the audit sample were assigned appropriately to team resources. Our review of this document and documentation for the 9 projects in the audit sample noted the following:</p> <ul style="list-style-type: none"> <li>• There are 42 different roles listed in the Project Roles and Responsibilities document often with similar responsibilities (it cannot be distinguished which of these are key roles that may be applicable to each project) which may make it very difficult to select and assign roles to project team members; and</li> <li>• Roles and responsibilities are not always or consistently documented, e.g. sometimes these roles are mentioned in the Integrated Project Plan. Also, it cannot be confirmed whether project manager communicated these roles and related responsibilities to the project team members.</li> </ul>				Low

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
		<p>In the absence of assignment and communication of roles and responsibilities to each member of the project team, there is a potential for ambiguity, conflict, and loss of collaboration among the project team members, which can negatively impact project health and culture and ultimately delays in completion of project activities.</p> <p><i>Recommendations</i></p> <p>It is recommended that management,</p> <ul style="list-style-type: none"> <li>• Review all roles listed within the Project Roles and Responsibilities document and reduce the number of role where feasible;</li> <li>• Determine key roles that should be identified and provide guidance on where they should documented for each project; and</li> <li>• Ensure that the project managers communicate the responsibilities of each role as these are assigned at the start of the project and any time a resource is added or changed.</li> </ul> <p><i>Management Response and Action plan</i></p> <p>The Project Roles and Responsibilities Document was updated last year to include a number of unique roles that were introduced as part of the MRP-RSS program. The inclusion of these unique roles has certainly increased the number of roles which are similar to other project roles. We felt that including these was a prudent approach rather than having a separate one just for MRP-RSS. Once MRP-RSS has concluded we will remove many of these roles which will address the observation.</p>			



No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
	<p>The document should be used during the Initiation Phase of a project for the Project Manager to determine what roles will be required to support the Project. The key roles and responsibilities are shared as part of the Kick Off meeting and should be communicated to new team members so that they understand their role and the role of others on the project. We believe that it would be good to revisit the roles and responsibilities prior to entering the Execution Phase to remind team members of their responsibilities. We will reinforce the importance of communicating the roles and responsibilities at an upcoming Change Delivery team meeting.</p> <p><i>Completion Date</i></p> <p>August 31, 2021</p>				
Control Objective: The approach for communication is documented to efficiently and effectively engage stakeholders by presenting relevant information in a timely manner.					
2	<p><i>Observation and Implications</i></p> <p>There is no documented guide on managing project communication. As part of the audit we attended and observed PSC meetings for 5 projects and noted that:</p> <ul style="list-style-type: none"><li>Meeting materials are generally provided to the PSC members only a day before the meeting. This short window means that PSC members do not have sufficient time to review materials; and</li><li>PSC members did not consistently provide feedback and/or confirmation on minutes that includes action items and issues within the 2 days requested by the project manager, therefore it is not certain whether all PSC members have read the minutes.</li></ul>				Low

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
		<p>Without the review of meeting minutes and confirmation from PSC members, errors and omissions may not become known and may have negative impact to the project health.</p> <p><i>Recommendations</i></p> <p>It is recommended that management,</p> <ul style="list-style-type: none"> <li>• Determine and require response from PSC members on PSC meeting minutes for projects where important PSC decisions were made, issues were noted and action items were required; and</li> <li>• Consider providing PSC meeting materials 3-7 days in advance of the meeting to allow sufficient review time.</li> </ul> <p><i>Management Response and Action plan</i></p> <p>Enterprise Change management recognizes the importance of the timely preparation of meeting materials and review of minutes and we endeavour to have materials prepared and issued well in advance of meetings. However due to workload and other priorities this is not always achieved. In response to the observations and recommendations we will:</p> <ul style="list-style-type: none"> <li>• Have PM's reinforce with PSC members the need to review minutes and highlight any errors or omissions following each PSC meeting; and</li> <li>• Reinforce the need for timely preparation and issuance of meeting materials ahead of PSC meetings with Project Managers.</li> </ul> <p><i>Completion Date</i></p> <p>September 30, 2021</p>			

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
Control Objective: The project activities ensure that planned work is complete, project information is appropriately stored/archived and organizational resources are released.					
3	<p><i>Observation and Implications</i></p> <p>As part of the audit, we gathered project documents from the [REDACTED] project folder (public access), and noted that all 9 projects had different layouts for filing project documents. In addition, it was not always easy to find the final version of project artifacts and deliverables due to varied folder location and naming conventions.</p> <p>Based on discussion with management, it is noted that MS Teams Channel is being leveraged by projects as the project collaboration tool and has the potential for storage, retrieval and communication of project documents with project team members and stakeholders.</p> <p>The ease of access of project documents will facilitate the retrieval and review of these documents by the project team members as these are needed during the project execution activities.</p> <p><i>Recommendations</i></p> <p>It is recommended that management should,</p> <ul style="list-style-type: none"> <li>Continue with the exploration of MS Teams as the tool for storage, retrieval and communication of project information and working documents to project members and stakeholders;</li> <li>Further, organize project folders in a logical sequence and ensure these are consistent among projects; and</li> </ul>				Low

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
				<ul style="list-style-type: none"> <li>• Provide ease of access and reduce search time for project team members and stakeholders by having the final versions of each key project document, i.e. project charter, integrated project plan, as an embedded object in the PPMLC framework.</li> </ul> <p><i>Management Response and Action plan</i></p> <p>With the introduction of MS Teams we have the ability to improve the line of sight on many of the products we are developing on the project as well as access to decision logs, risk logs etc. Setting up folders and structures consistently will further facilitate this. Enterprise Change management is currently looking at how we can better and more consistently leverage MS Teams and determine how we want to use [REDACTED] and [REDACTED] going forward. As part of this review we can also consider the suggestion about how to make it easier to find key project documents. We plan to complete our review and share our proposal with members of the Enterprise Change Team by October 31, 2021.</p> <p><i>Completion Date</i></p> <p>October 31, 2021</p>	

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
Control Objective: Assessment and improvements are made to enhance project team members’ competencies, interactions, interpersonal skills and overall team environment that results in motivated employees, reduced attrition and improved overall project performance.					
4	<p><i>Observation and Implications</i></p> <p>Based on discussions with management and project managers, and review of job documents it is noted that required technical skills are considered before project managers are hired. However, we attended 6 PSC meetings that were managed by different project managers and noted that communication, facilitation and presentation skills (soft skills) of project team members were not similar.</p> <p>Strong soft skills are vital for ensuring that PSC meetings provide value and contribute to a positive project culture.</p> <p><i>Recommendation</i></p> <p>It is recommended that management as part of performance management process make available individualized training program/s to project team members in order to further develop the competencies of staff for interpersonal and presentation skills e.g. effective facilitation of PSC meetings.</p> <p><i>Management Response and Action plan</i></p> <p>Enterprise Change management agrees with the importance in developing these important soft skills and have invested time and resources over the past two years to undertake both formal and informal training programs to support our team members. We will continue to identify areas for further development both across the team and individually and provide coaching, feedback and additional formal training as necessary.</p>				Low

No.	[Strategic Business Objective, Area Impacted, Objective, Obligation, etc.]	Observations and Implications	Recommendations	Management Response and Action Plan	Relative Risk
	<i>Completion Date</i>  Ongoing				

## Appendix B – Background

### Background & Rationale for the Review

Enterprise Change group is the IESO's centralized team responsible for prioritization, governance and delivery of enterprise change at the IESO and ensuring that projects achieve their objectives. Within Enterprise Change there are two teams (Project Management Office and Change Delivery) that have the following roles related to Project Management processes:

Project Management Office has the following responsibilities:

- Establish and Promote Project Governance.
- Ensuring establishment and adherence to Project Controls.
- Establish & promote Project Management standards, methodologies, processes, procedures, guides, templates and tools including Project Management Life Cycle Process.
- Portfolio Development - Project Intake, Prioritization and Business Planning support.
- Project Resource Planning.
- Project management training through workshops.
- Provide a centralized archive including lessons learned and project performance data.
- Produce consolidated project reporting including monthly Project Portfolio Dashboard Report, quarterly Ranked Project List, project status and financials.

Change Delivery including the MRP team has the following responsibilities:

- Portfolio Management - oversight of the approved portfolio of programs and projects
- Program Management - oversight for the collections of related projects
- Project Delivery – planning, initiation, execution, closure, monitoring and control
- Project Resource Management

## Objective & Scope of the Review

The objective of this engagement was to provide reasonable assurance that the program and project management function is suitably designed and operating effectively as per the PPMLC framework.

### Scope

The scope of this review includes the following project management processes and activities within the Portfolio and Project Management Life Cycle employed to meet business objectives:

Initiating processes – to define objectives of a new project or new phase of an existing project and obtain authorization to start the project and/or phase;

Planning processes – to establish scope of the project and business objectives, and define the course of action required to achieve these in the integrated project plan (IPP) and project charter;

Executing processes – to perform the work defined in the IPP and project charter to achieve business objectives;

Monitoring and controlling processes – to track, review, and regulate the progress and performance of the project, identify changes required to the IPP and carry out activities to effect these changes; and

Closing processes – to formally close the project and capture lessons learned.

To assess the operating effectiveness of the Project Management processes, Internal Audit assessed representative examples of controls implemented during the period of January 1, 2020 to January 31, 2021.

### Out of scope

This review excluded the following:

- Project Inception phase that includes activities to review submission of project, consolidation into a portfolio for ELT review and approval and reflect project's capital and operating budget in the business plan.
- Organizational change management resulting from a project.
- System Development Life Cycle or similar approaches used for delivery of product and systems.
- Measurement of business value delivery after project completion.

### Criteria of Assessment

The Audit Team assessed the controls within the the project management processes (as per the PPMLC framework) to provide reasonable assurance on the adequacy of their design and operating effectiveness to meet business objectives:

#### 1. Initiating Processes

- A project charter is developed to formally authorize the start of the project and provide the authority to apply organizational resources to project activities; and
- Stakeholders for the project are identified and their interests, dependencies, involvement and impact is analyzed and documented.

#### 2. Planning Processes

- An integrated project plan is prepared that defines the basis of all project work and how the work will be performed;



- Business objectives are determined and documented in the project charter that helps to define the project scope;
- A project schedule is developed, documented and analyzed with planned dates for completing project activities and is used for executing, monitoring and controlling the project;
- Monetary resources needed to complete project work are estimated to establish an authorized cost baseline against which project performance can be monitored and controlled;
- A quality management plan is prepared to provide guidance and direction on how quality will be managed and verified throughout the project;
- A resource management plan is developed to estimate, acquire, manage and utilize physical and team resources to help establish the approach and level of management efforts needed for managing project resources;
- The approach for communication is documented to efficiently and effectively engage stakeholders by presenting relevant information in a timely manner; and
- A plan for project risk management is developed to identify project risks and sources of risk, and that the degree, type and visibility of risk management are appropriate to both the risk and the importance of project to the organization and other stakeholders.

### 3. Executing Processes

- Leading the work defined in the integrated project plan including overall management of the project work and deliverables to ensure the project progresses according to plan and where changes are required these are authorized and implemented in a timely manner;
- Resources including team members, facilities, equipment etc. are acquired and assigned appropriately;
- Assessment and improvements are made to enhance team members' competencies, interactions, interpersonal skills and overall team environment that result in motivated employees, reduced attrition and improved overall project performance;
- The project information is communicated efficiently and effectively between the project team and stakeholders; and
- Appropriate risk responses are identified, agreed upon and implemented to minimize project threats and maximize project opportunities.

### 4. Monitoring and Controlling Processes

- The project's overall progress is tracked, reviewed and reported to inform stakeholders of the current state of the project, any actions taken to address performance issues and any impacts to the project schedule and cost; and

- The project agreed upon risk responses are implemented and monitored as well as new risks and risk responses are identified and implemented as applicable.

## 5. Closing Processes

- The project close out activities ensure that planned work is complete, project information is appropriately stored/archived and organizational resources are released.

# Audit Approach

Information supporting our: (1) understanding of the Project Management process, risks and controls; (2) analysis of risks and controls; (3) assessment of the process and controls related to Project Management Process; and (4) conclusions and recommendations, were obtained, through the following audit activities:

## Planning

- We conducted interviews (MS Teams) with personnel having key accountabilities and responsibilities to understand the process and to identify risks and mitigating controls;
- We reviewed applicable policies, procedures, and related material to understand and analyze the process;
- We validated the criteria of assessment and our understanding of the process, risks and key controls with management to ensure the completeness and accuracy of our understanding of in-scope risks and controls.

## Fieldwork

- We identified gaps, risk exposures, and improvement opportunities on current process controls in order to improve the Project Management process objectives;
- We defined and performed test procedures to determine the adequacy and design and operating effectiveness of key controls to the achievement of Project Management process objectives. Audit test procedures included observation, inspection, re-performance through sample testing, and interviews (MS Teams) with staff having key roles and responsibilities for meeting Project Management process objectives.

## Reporting

- We summarized the results of the review in a draft report for management feedback;
- We finalized the report based on management feedback, including management's response to identified gaps, risk exposures, recommendations and opportunities for improvement. The final report will be issued to the Director – Enterprise Change;
- A summary of the final report will be provided to the Audit Committee (AC) highlighting high and medium risk observations, recommendations, management response and action plans. The full report may be provided to the Audit Committee upon request.

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1 **SEC INTERROGATORY 19**

2 Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous  
3 proceedings?

4 5.1-SEC-19

5 **INTERROGATORY**

6 [G-1-1, Attachment 5] Please provide a copy of the underlying cost allocation model  
7 spreadsheet.

8 **RESPONSE**

9 a) See Attachment 1 to this Exhibit.

## 2022 IESO Cost Allocation Model

Version: February 18, 2022

## Functionalized Accounts

Revenue Requirement (\$)	\$201,500,000
Net Fixed Assets (\$)	\$102,646,990

### Expense Accounts (Revenue Requirement)

Accounts	Forecast Financial Statement	Reclassify accounts	Reclassified Balance	Allocator
CEO - CEO Office	1,800,000		\$1,800,000	O&A
CEO - Internal Audit	1,300,000		\$1,300,000	O&A
Markets & Reliability - VP Office	800,000		\$800,000	M&R
Markets & Reliability - Power System Assessments	14,900,000		\$14,900,000	TWh
Markets & Reliability - Market Operations	15,700,000		\$15,700,000	TWh
Markets & Reliability - Wholesale Market Development	3,700,000		\$3,700,000	TWh
Markets & Reliability - Reliability Assurance	800,000		\$800,000	TWh
Planning, Conservation and Resource Adequacy - Resource Planning	6,000,000		\$6,000,000	DOM
Planning, Conservation and Resource Adequacy - Transmission Planning	4,400,000		\$4,400,000	DOM
Planning, Conservation and Resource Adequacy - Resource & System Adequacy	5,200,000		\$5,200,000	DOM
Planning, Conservation and Resource Adequacy - Energy Efficiency	6,200,000		\$6,200,000	DOM
Corporate Relations, Stakeholder Engagement and Innovation - VP Office	604,027		\$604,027	CRSEI
Corporate Relations, Stakeholder Engagement and Innovation - Corporate Affairs	9,060,403		\$9,060,403	DOM
Corporate Relations, Stakeholder Engagement and Innovation - Innovation, Research & Development	5,335,570		\$5,335,570	DOM
Information and Technology Services - VP Office	1,303,009		\$1,303,009	ITS
Information and Technology Services - CIO Office	1,102,546		\$1,102,546	O&A
Information and Technology Services - Information Security	4,710,880		\$4,710,880	O&A
Information and Technology Services - Business Services & Solution Delivery	15,535,880		\$15,535,880	O&A
Information and Technology Services - IT Infrastructure & Operations	20,647,685		\$20,647,685	O&A
Legal Resources and Corporate Governance - VP Office	1,505,338		\$1,505,338	LRCG
Legal Resources and Corporate Governance - General Counsel	10,236,299		\$10,236,299	TWh
Legal Resources and Corporate Governance - Market Rules and Regulatory Affairs	2,308,185		\$2,308,185	TWh
Legal Resources and Corporate Governance - OEB assessment fees	903,203		\$903,203	TWh
Legal Resources and Corporate Governance - Board	702,491		\$702,491	TWh
Legal Resources and Corporate Governance - NERC and NPCC Membership	4,716,726		\$4,716,726	HALF
Legal Resources and Corporate Governance - Contract Management	7,827,758		\$7,827,758	DOM
Corporate Services - VP Office	700,000		\$700,000	CS
Corporate Services - Procurement	5,700,000		\$5,700,000	O&A
Corporate Services - Corporate Finance	2,000,000		\$2,000,000	O&A
Corporate Services - Risk, Performance & Reliance	700,000		\$700,000	O&A
Corporate Services - Settlements	5,100,000		\$5,100,000	TWh
Corporate Services - Enterprise Change	9,200,000		\$9,200,000	O&A
Corporate Services - Facilities	3,100,000		\$3,100,000	O&A
Market Assessment and Compliance Division	1,300,000		\$1,300,000	TWh
Market Renewal	5,200,000		\$5,200,000	TWh
Human Resources	5,000,000		\$5,000,000	O&A
Corporate Adjustment - General	1,200,000		\$1,200,000	O&A
Amortization	20,000,000		\$20,000,000	TWh
Interest	- 5,000,000		(\$5,000,000)	TWh
<b>Total Expenses (Revenue Requirement)</b>	<b>\$201,500,000</b>	<b>\$0</b>	<b>\$201,500,000</b>	

### Fixed Asset Accounts

Accounts	Forecast Financial Statement	Reclassify accounts	Reclassified Balance	Allocator
Assets - Assets	56,423,729		\$56,423,729	TWh
Assets - Market systems & applications	338,405,073		\$338,405,073	TWh
Assets - Infrastructure & other assets	77,009,334		\$77,009,334	TWh
Assets - Assets Under Construction	26,492,185		\$26,492,185	TWh
Accumulated Amortization	(\$395,683,332)		(\$395,683,332)	Assets
<b>Net Fixed Assets</b>	<b>\$102,646,990</b>	<b>\$0</b>	<b>\$102,646,990</b>	

Note: The IESO does not have a Rate Base similar to rate regulated utilities. Fixed Assets are allocated to test the assumption that TWh is a sensible allocator for Interest and Amortization.

## Revenue Worksheet

		1	2
	Total	Domestic	Export
<b><u>Billing Data</u></b>			
Gross MWh	155,000,000	139,100,000	15,900,000
IESO MWh Rate		\$1.2710	\$1.0943 (EB-2020-0230)
Net Class Revenue	\$194,195,470	\$176,796,100	\$17,399,370
<b><u>Single Charge Scenario</u></b>			
Revenue Requirement	\$201,500,000		
Uniform Rate		\$1.3000	\$1.3000
Revenue at Uniform Rate		\$180,830,000	\$20,670,000

## Demand Data Worksheet

<u>Customer Classes</u>			1	2
		Total	Domestic	Export
<b>Volume</b>				
Demand			132.0	15.9
Less Transmission Line Losses		3.0	2.7	0.3
Demand with Losses		144.900	129.3	15.6
Embedded Generation		7.1	7.1	
Gross MWh	TWh	155.00	139.1	15.9
Domestic MWh	DTWh	139.1	139.1	

Gross MWh Matches 'Revenue' MWh



## Revenue to Cost Summary Worksheet

### Class Revenue, Cost Analysis

		1	2
		Domestic	Export
<b>Revenue at Existing Rates</b>	<b>\$194,195,470</b>	\$176,796,100	\$17,399,370
Factor required to recover Revenue Requirement	<b>1.03761</b>		
<b>Revenue at Status Quo Rates</b>	<b>\$201,500,000</b>	\$183,446,165	\$18,053,835
<b>Revenue at Single Rate</b>	<b>\$201,500,000</b>	\$180,830,000	\$20,670,000
<b>Expenses</b>			
CEO	<b>\$3,100,000</b>	\$2,858,010	\$241,990
M&R	<b>\$35,900,000</b>	\$32,217,355	\$3,682,645
PCRA	<b>\$21,800,000</b>	\$21,800,000	\$0
CRSEI	<b>\$15,000,000</b>	\$15,000,000	\$0
ITS	<b>\$43,300,000</b>	\$39,919,945	\$3,380,055
LRCG	<b>\$28,200,000</b>	\$24,290,682	\$3,909,318
CS	<b>\$26,500,000</b>	\$24,302,934	\$2,197,066
MACD	<b>\$1,300,000</b>	\$1,166,645	\$133,355
MR	<b>\$5,200,000</b>	\$4,666,581	\$533,419
HR	<b>\$5,000,000</b>	\$4,609,693	\$390,307
CA	<b>\$1,200,000</b>	\$1,106,326	\$93,674
Int	<b>(\$5,000,000)</b>	<b>(\$4,487,097)</b>	<b>(\$512,903)</b>
Dep	<b>\$20,000,000</b>	\$17,948,387	\$2,051,613
<b>Revenue Requirement</b>	<b>\$201,500,000</b>	<b>\$185,399,462</b>	<b>\$16,100,538</b>
<b>Revenue Requirement Input equals Output</b>			
<b>Rate Revenue Required</b>	<b>\$201,500,000</b>	<b>\$185,399,462</b>	<b>\$16,100,538</b>
<b>Revenue to Expense at Status Quo Rates</b>	<b>100.00%</b>	<b>98.95%</b>	<b>112.13%</b>
<b>Revenue to Expense at Single Rate</b>	<b>100.00%</b>	<b>97.54%</b>	<b>128.38%</b>
Volume (MWh)	<b>155,000,000</b>	139,100,000	15,900,000
<b>Separate Rates</b>		\$1.3329	\$1.0126
<b>Rate Weight (percent of domestic rate)</b>			<b>76.0%</b>
<b>Rounded Rates</b>		\$1.3329	\$1.0126
<b>Revenue at Rounded Rates</b>	<b>\$201,506,730</b>	\$185,406,390	\$16,100,340
<b>Surplus (Shortfall) - Rounded Rates</b>	<b>\$6,730</b>	<b>\$6,928</b>	<b>(\$198)</b>
<b>Current Rates</b>		\$1.2710	\$1.0943
<b>Rate Change (\$)</b>		\$0.0619	<b>(\$0.0817)</b>
<b>Rate Change (%)</b>	<b>3.76%</b>	4.87%	-7.47%

## Summary of Allocation by Class & Accounts

### ALLOCATION BY RATE CLASSIFICATION

			1	2
Accounts	O1 Grouping	Total	Domestic	Export
CEO - CEO Office	CEO	\$1,800,000	\$1,659,490	\$140,510
CEO - Internal Audit	CEO	\$1,300,000	\$1,198,520	\$101,480
Markets & Reliability - VP Office	M&R	\$800,000	\$717,935	\$82,065
Markets & Reliability - Power System Assessments	M&R	\$14,900,000	\$13,371,548	\$1,528,452
Markets & Reliability - Market Operations	M&R	\$15,700,000	\$14,089,484	\$1,610,516
Markets & Reliability - Wholesale Market Development	M&R	\$3,700,000	\$3,320,452	\$379,548
Markets & Reliability - Reliability Assurance	M&R	\$800,000	\$717,935	\$82,065
Planning, Conservation and Resource Adequacy - Resource Planning	PCRA	\$6,000,000	\$6,000,000	\$0
Planning, Conservation and Resource Adequacy - Transmission Planning	PCRA	\$4,400,000	\$4,400,000	\$0
Planning, Conservation and Resource Adequacy - Resource & System Adequacy	PCRA	\$5,200,000	\$5,200,000	\$0
Planning, Conservation and Resource Adequacy - Energy Efficiency	PCRA	\$6,200,000	\$6,200,000	\$0
Corporate Relations, Stakeholder Engagement and Innovation - VP Office	CRSEI	\$604,027	\$604,027	\$0
Corporate Relations, Stakeholder Engagement and Innovation - Corporate Affairs	CRSEI	\$9,060,403	\$9,060,403	\$0
Corporate Relations, Stakeholder Engagement and Innovation - Innovation, Research & Development	CRSEI	\$5,335,570	\$5,335,570	\$0
Information and Technology Services - VP Office	ITS	\$1,303,009	\$1,201,295	\$101,715
Information and Technology Services - CIO Office	ITS	\$1,102,546	\$1,016,480	\$86,066
Information and Technology Services - Information Security	ITS	\$4,710,880	\$4,343,142	\$367,737
Information and Technology Services - Business Services & Solution Delivery	ITS	\$15,535,880	\$14,323,128	\$1,212,751
Information and Technology Services - IT Infrastructure & Operations	ITS	\$20,647,685	\$19,035,900	\$1,611,786
Legal Resources and Corporate Governance - VP Office	LRCG	\$1,505,338	\$1,405,918	\$99,420
Legal Resources and Corporate Governance - General Counsel	LRCG	\$10,236,299	\$9,186,253	\$1,050,046
Legal Resources and Corporate Governance - Market Rules and Regulatory Affairs	LRCG	\$2,308,185	\$2,071,410	\$236,775
Legal Resources and Corporate Governance - OEB assessment fees	LRCG	\$903,203	\$810,552	\$92,651
Legal Resources and Corporate Governance - Board	LRCG	\$702,491	\$630,429	\$72,062
Legal Resources and Corporate Governance - NERC and NPCC Membership	LRCG	\$4,716,726	\$2,358,363	\$2,358,363
Legal Resources and Corporate Governance - Contract Management	LRCG	\$7,827,758	\$7,827,758	\$0
Corporate Services - VP Office	CS	\$700,000	\$641,964	\$58,036
Corporate Services - Procurement	CS	\$5,700,000	\$5,255,050	\$444,950
Corporate Services - Corporate Finance	CS	\$2,000,000	\$1,843,877	\$156,123
Corporate Services - Risk, Performance & Reliance	CS	\$700,000	\$645,357	\$54,643
Corporate Services - Settlements	CS	\$5,100,000	\$4,576,839	\$523,161
Corporate Services - Enterprise Change	CS	\$9,200,000	\$8,481,836	\$718,164
Corporate Services - Facilities	CS	\$3,100,000	\$2,858,010	\$241,990
Market Assessment and Compliance Division	MACD	\$1,300,000	\$1,166,645	\$133,355
Market Renewal	MR	\$5,200,000	\$4,666,581	\$533,419
Human Resources	HR	\$5,000,000	\$4,609,693	\$390,307
Corporate Adjustment - General	CA	\$1,200,000	\$1,106,326	\$93,674
Amortization	Dep	\$20,000,000	\$17,948,387	\$2,051,613
Interest	Int	(\$5,000,000)	(\$4,487,097)	(\$512,903)
Assets - Assets	rb	\$56,423,729	\$50,635,747	\$5,787,983
Assets - Market systems & applications	rb	\$338,405,073	\$303,691,262	\$34,713,811
Assets - Infrastructure & other assets	rb	\$77,009,334	\$69,109,666	\$7,899,667
Assets - Assets Under Construction	rb	\$26,492,185	\$23,774,600	\$2,717,585
Accumulated Amortization	rb	(\$395,683,332)	(\$355,093,880)	(\$40,589,451)
Total Allocation		\$304,146,990	\$277,516,857	\$26,630,133
Total Expense Allocation		\$201,500,000	\$185,399,462	\$16,100,538
Check		Okay		

## Composite Allocator Detail Worksheet

	1	2
Demand Total	Domestic	Export

### Fixed Assets

Assets - Assets	\$56,423,729	\$50,635,747	\$5,787,983
Assets - Market systems & applications	\$338,405,073	\$303,691,262	\$34,713,811
Assets - Infrastructure & other assets	\$77,009,334	\$69,109,666	\$7,899,667
Assets - Assets Under Construction	\$26,492,185	\$23,774,600	\$2,717,585

Gross Fixed Assets	\$498,330,321	\$447,211,275	\$51,119,046
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### Accumulated Amortization

Assets - Assets	(\$28,494,311)	(\$25,571,346)	(\$2,922,965)
Assets - Market systems & applications	(\$302,900,825)	(\$271,829,063)	(\$31,071,762)
Assets - Infrastructure & other assets	(\$64,288,196)	(\$57,693,471)	(\$6,594,725)
Assets - Assets Under Construction	\$0	\$0	\$0

Accumulated Amortization	(\$395,683,332)	(\$355,093,880)	(\$40,589,451)
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Net Fixed Assets	\$102,646,990	\$92,117,395	\$10,529,594
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### Amortization Expense

Assets - Assets	\$634,998	\$569,860	\$65,139
Assets - Market systems & applications	\$14,784,028	\$13,267,473	\$1,516,555
Assets - Infrastructure & other assets	\$4,580,974	\$4,111,054	\$469,919
Assets - Assets Under Construction	\$0	\$0	\$0

Accumulated Amortization Total	\$20,000,000	\$17,948,387	\$2,051,613
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### Identifiable O&A

Markets & Reliability - VP Office	\$800,000	\$717,935	\$82,065
Markets & Reliability - Power System Assessments	\$14,900,000	\$13,371,548	\$1,528,452
Markets & Reliability - Market Operations	\$15,700,000	\$14,089,484	\$1,610,516
Markets & Reliability - Wholesale Market Development	\$3,700,000	\$3,320,452	\$379,548
Markets & Reliability - Reliability Assurance	\$800,000	\$717,935	\$82,065
Planning, Conservation and Resource Adequacy - Resource Planning	\$6,000,000	\$6,000,000	\$0
Planning, Conservation and Resource Adequacy - Transmission Planning	\$4,400,000	\$4,400,000	\$0
Planning, Conservation and Resource Adequacy - Resource & System Adequacy	\$5,200,000	\$5,200,000	\$0
Planning, Conservation and Resource Adequacy - Energy Efficiency	\$6,200,000	\$6,200,000	\$0
Corporate Relations, Stakeholder Engagement and Innovation - VP Office	\$604,027	\$604,027	\$0
Corporate Relations, Stakeholder Engagement and Innovation - Corporate Affairs	\$9,060,403	\$9,060,403	\$0
Corporate Relations, Stakeholder Engagement and Innovation - Innovation, Research & Development	\$5,335,570	\$5,335,570	\$0
Legal Resources and Corporate Governance - VP Office	\$1,505,338	\$1,405,918	\$99,420
Legal Resources and Corporate Governance - General Counsel	\$10,236,299	\$9,186,253	\$1,050,046
Legal Resources and Corporate Governance - Market Rules and Regulatory Affairs	\$2,308,185	\$2,071,410	\$236,775
Legal Resources and Corporate Governance - OEB assessment fees	\$903,203	\$810,552	\$92,651
Legal Resources and Corporate Governance - Board	\$702,491	\$630,429	\$72,062
Legal Resources and Corporate Governance - NERC and NPCC Membership	\$4,716,726	\$2,358,363	\$2,358,363
Legal Resources and Corporate Governance - Contract Management	\$7,827,758	\$7,827,758	\$0
Corporate Services - Settlements	\$5,100,000	\$4,576,839	\$523,161
Market Assessment and Compliance Division	\$1,300,000	\$1,166,645	\$133,355
Market Renewal	\$5,200,000	\$4,666,581	\$533,419

O&A Total	\$112,500,000	\$103,718,102	\$8,781,898
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## Allocator Worksheet

**Details:**

The worksheet below details how allocators are derived.

			1	2
Explanation	ID and Factors	Total	Domestic	Export
<b>Energy</b>				
System TWh	TWh	100.00%	89.74%	10.26%
Domestic TWh	DTWh	100.00%	100.00%	0.00%
<b>CUSTOMER ALLOCATORS</b>				
<b>Composite Allocators</b>				
Gross Assets	GA	100.00%	89.74%	10.26%
Net Fixed Assets	NFA	100.00%	89.74%	10.26%
Identifiable O&A	O&A	100.00%	92.19%	7.81%
Dedicated to Domestic	DOM	100.00%	100%	0%
Dedicated to Export	EXP	100.00%	0%	100%
Equal Halves	HALF	100.00%	50.00%	50.00%
Markets & Reliability	M&R	100.00%	89.74%	10.26%
Planning, Conservation and Resource Adequacy	PCRA	100.00%	100.00%	0.00%
Corporate Relations, Stakeholder Engagement and Innovation	CRSEI	100.00%	100.00%	0.00%
Information and Technology Services	ITS	100.00%	92.19%	7.81%
Legal Resources and Corporate Governance	LRCG	100.00%	93.40%	6.60%
Corporate Services	CS	100.00%	91.71%	8.29%

## Allocation Detail Worksheet

This sheet shows what accounts are included in the COSS and how the categorized costs are allocated.

Accounts	Classification and Allocation
CEO - CEO Office	O&A
CEO - Internal Audit	O&A
Markets & Reliability - VP Office	M&R
Markets & Reliability - Power System Assessments	TWh
Markets & Reliability - Market Operations	TWh
Markets & Reliability - Wholesale Market Development	TWh
Markets & Reliability - Reliability Assurance	TWh
Planning, Conservation and Resource Adequacy - Resource Planning	DOM
Planning, Conservation and Resource Adequacy - Transmission Planning	DOM
Planning, Conservation and Resource Adequacy - Resource & System Adequacy	DOM
Planning, Conservation and Resource Adequacy - Energy Efficiency	DOM
Corporate Relations, Stakeholder Engagement and Innovation - VP Office	CRSEI
Corporate Relations, Stakeholder Engagement and Innovation - Corporate Affairs	DOM
Corporate Relations, Stakeholder Engagement and Innovation - Innovation, Research & Development	DOM
Information and Technology Services - VP Office	ITS
Information and Technology Services - CIO Office	O&A
Information and Technology Services - Information Security	O&A
Information and Technology Services - Business Services & Solution Delivery	O&A
Information and Technology Services - IT Infrastructure & Operations	O&A
Legal Resources and Corporate Governance - VP Office	LRCG
Legal Resources and Corporate Governance - General Counsel	TWh
Legal Resources and Corporate Governance - Market Rules and Regulatory Affairs	TWh
Legal Resources and Corporate Governance - OEB assessment fees	TWh
Legal Resources and Corporate Governance - Board	TWh
Legal Resources and Corporate Governance - NERC and NPCC Membership	HALF
Legal Resources and Corporate Governance - Contract Management	DOM
Corporate Services - VP Office	CS
Corporate Services - Procurement	O&A
Corporate Services - Corporate Finance	O&A
Corporate Services - Risk, Performance & Reliance	O&A
Corporate Services - Settlements	TWh
Corporate Services - Enterprise Change	O&A
Corporate Services - Facilities	O&A
Market Assessment and Compliance Division	TWh
Market Renewal	TWh
Human Resources	O&A
Corporate Adjustment - General	O&A
Amortization	TWh
Interest	TWh
Assets - Assets	TWh
Assets - Market systems & applications	TWh
Assets - Infrastructure & other assets	TWh
Assets - Assets Under Construction	TWh
Accumulated Amortization	Assets

## Reconciliation Worksheet

**Details:**

The worksheet below shows reconciliation of costs included and excluded in the Trial Balance.

Accounts	Financial Statement	Balance in Summary by Class and Accounts	Difference
CEO - CEO Office	\$1,800,000	\$1,800,000	\$0
CEO - Internal Audit	\$1,300,000	\$1,300,000	\$0
Markets & Reliability - VP Office	\$800,000	\$800,000	\$0
Markets & Reliability - Power System Assessments	\$14,900,000	\$14,900,000	\$0
Markets & Reliability - Market Operations	\$15,700,000	\$15,700,000	\$0
Markets & Reliability - Wholesale Market Development	\$3,700,000	\$3,700,000	\$0
Markets & Reliability - Reliability Assurance	\$800,000	\$800,000	\$0
Planning, Conservation and Resource Adequacy - Resource Planning	\$6,000,000	\$6,000,000	\$0
Planning, Conservation and Resource Adequacy - Transmission Planning	\$4,400,000	\$4,400,000	\$0
Planning, Conservation and Resource Adequacy - Resource & System Adequacy	\$5,200,000	\$5,200,000	\$0
Planning, Conservation and Resource Adequacy - Energy Efficiency	\$6,200,000	\$6,200,000	\$0
Corporate Relations, Stakeholder Engagement and Innovation - VP Office	\$604,027	\$604,027	\$0
Corporate Relations, Stakeholder Engagement and Innovation - Corporate Affairs	\$9,060,403	\$9,060,403	\$0
Corporate Relations, Stakeholder Engagement and Innovation - Innovation, Research & Development	\$5,335,570	\$5,335,570	\$0
Information and Technology Services - VP Office	\$1,303,009	\$1,303,009	\$0
Information and Technology Services - CIO Office	\$1,102,546	\$1,102,546	\$0
Information and Technology Services - Information Security	\$4,710,880	\$4,710,880	\$0
Information and Technology Services - Business Services & Solution Delivery	\$15,535,880	\$15,535,880	\$0
Information and Technology Services - IT Infrastructure & Operations	\$20,647,685	\$20,647,685	\$0
Legal Resources and Corporate Governance - VP Office	\$1,505,338	\$1,505,338	\$0
Legal Resources and Corporate Governance - General Counsel	\$10,236,299	\$10,236,299	\$0
Legal Resources and Corporate Governance - Market Rules and Regulatory Affairs	\$2,308,185	\$2,308,185	\$0
Legal Resources and Corporate Governance - OEB assessment fees	\$903,203	\$903,203	\$0
Legal Resources and Corporate Governance - Board	\$702,491	\$702,491	\$0
Legal Resources and Corporate Governance - NERC and NPCC Membership	\$4,716,726	\$4,716,726	\$0
Legal Resources and Corporate Governance - Contract Management	\$7,827,758	\$7,827,758	\$0
Corporate Services - VP Office	\$700,000	\$700,000	\$0
Corporate Services - Procurement	\$5,700,000	\$5,700,000	\$0
Corporate Services - Corporate Finance	\$2,000,000	\$2,000,000	\$0
Corporate Services - Risk, Performance & Reliance	\$700,000	\$700,000	\$0
Corporate Services - Settlements	\$5,100,000	\$5,100,000	\$0
Corporate Services - Enterprise Change	\$9,200,000	\$9,200,000	\$0
Corporate Services - Facilities	\$3,100,000	\$3,100,000	\$0
Market Assessment and Compliance Division	\$1,300,000	\$1,300,000	\$0
Market Renewal	\$5,200,000	\$5,200,000	\$0
Human Resources	\$5,000,000	\$5,000,000	\$0
Corporate Adjustment - General	\$1,200,000	\$1,200,000	\$0
Amortization	\$20,000,000	\$20,000,000	\$0
Interest	(\$5,000,000)	(\$5,000,000)	\$0
Assets - Assets	\$56,423,729	\$56,423,729	\$0
Assets - Market systems & applications	\$338,405,073	\$338,405,073	\$0
Assets - Infrastructure & other assets	\$77,009,334	\$77,009,334	\$0
Assets - Assets Under Construction	\$26,492,185	\$26,492,185	\$0
Accumulated Amortization	(\$395,683,332)	(\$395,683,332)	\$0
<b>Total</b>	<b>\$304,146,990</b>	<b>\$304,146,990</b>	<b>\$0</b>

**SUP INTERROGATORY 7**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5.1-Society-7

**INTERROGATORY**

Reference: B-1-3

Minister of Energy, Northern Development and Mines letter approving the 2022-2024 Business Plan, dated February 3, 2022. Page 2

The next IESO Business Plan (to be submitted September 2022) is to elaborate upon how it meets government priorities including:

*d) Workforce Management*

*g) Diversity and Inclusion*

a) Please explain what the government priorities are regarding both Workforce Management and Diversity and Inclusion and how they impact upon IESO.

**RESPONSE**

a) The IESO is not able to speak on behalf of government or the government's priorities. The IESO identified in its Business Plan, approved by the Minister of Energy, that it is committed to continuing to invest in education and training to create a diverse and inclusive workforce in order to meet the objectives set out in the Business Plan.

In the Minister's February 2022 letter approving the Business Plan it is noted that Ministry staff will provide details on their expectations on the noted government priorities (see Exhibit B-1-3 – Minister's Letter Approving the IESO's 2022-2024 Business Plan, pg. 2).

**SUP INTERROGATORY 8**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5.1-Society-8

**INTERROGATORY**

Reference: B-1-3

Minister of Energy, Northern Development and Mines letter approving the 2022-2024 Business Plan, dated February 3, 2022. Page 2

The minister states in his letter that he expects the IESO business plan to provide updates on:

*2 Progress with execution on government priority initiatives discussed in the Consolidated Business Plan, including those outlined in my letters to the IESO dated October 7, 2021 and November 10, 2021.*

*6 Collective bargaining and alignment with broader government priorities on broader public sector compensation.*

- a) Please provide the Minister's two letters to the IESO dated October 7, 2021 and November 10, 2021 and explain what progress has been made by IESO on execution of the government priority initiatives outlined in them.
- b) Please explain what the "broader government priorities on broader public sector compensation" are.
- c) Please explain what IESO intends to do in order to become in "alignment with broader government priorities on broader public sector compensation".

**RESPONSE**

- a) The Minister's letters dated October 7, 2021<sup>1</sup> and November 10, 2021<sup>2</sup> are publicly available on the IESO website. The initiatives outlined in the letters and their status are included in Table 1 below.

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<sup>1</sup> Minister of Energy Letter, October 7 2021: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Letter-from-Minister-Gas-Phase-Out-Impact-Assessment.ashx>

<sup>2</sup> Minister of Energy, November, 2021: <https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Letter-from-the-Minister-of-Energy-MC-994-2021-717.ashx>



1 **Table 1: Initiatives and Status**

<b>Letter</b>	<b>Initiative</b>	<b>Status</b>	<b>Website Link</b>
October 7, 2021	Evaluate a moratorium on the procurement of new natural gas generating stations in Ontario and develop and achievable pathway to zero emissions in the electricity sector	The IESO has begun the detailed analysis with the aim to report back to the Minister by November 2022 as required.  A consultation was launched on February 3, 2022 to engage stakeholders on the study approach	<a href="https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Pathways-to-Decarbonization">https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Pathways-to-Decarbonization</a>
November 10, 2021	Future Competitive Procurement Mechanisms	The IESO has developed a Resource Adequacy Framework that is an enduring approach to identifying the type of acquisition activity suited to address system needs	<a href="https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Resource-Adequacy-Engagement">https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Resource-Adequacy-Engagement</a>
November 10, 2021	Ensuring Short-Term System Reliability	As part of the Resource Adequacy framework, the IESO continues to run an annual capacity auction to address short-term system reliability needs.	<a href="https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Resource-Adequacy-Engagement">https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Resource-Adequacy-Engagement</a>
November 10, 2021	Approach for Re-contracting Biomass Generation Facilities;	A new contract has been finalized Atlantic Power for the Calstock biomass generating facility.	<a href="https://www.ieso.ca/en/Sector-Participants/IESO-News/2022/03/New-Contract-with-Calstock-GS-Finalized">https://www.ieso.ca/en/Sector-Participants/IESO-News/2022/03/New-Contract-with-Calstock-GS-Finalized</a>

November 10, 2021	Program for Re-contracting Small Hydroelectric Facilities	This consultation falls under the broader resource adequacy framework and engagement with stakeholders on this item has been initiated	<a href="https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Resource-Adequacy-Engagement">https://www.ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Resource-Adequacy-Engagement</a>
November 10, 2021	Update to 2016 Study on Energy Storage in Ontario;	A new report was published March 31, 2022 that provides an update on status of obstacles to storage resources in Ontario	<a href="https://ieso.ca/-/media/Files/IESO/Document-Library/ieso/update-on-obstacles-to-storage-resources-in-Ontario.ashx">https://ieso.ca/-/media/Files/IESO/Document-Library/ieso/update-on-obstacles-to-storage-resources-in-Ontario.ashx</a>
November 10, 2021	Gate 2 Review for Marmora, Meaford and Schreiber Pumped Storage Projects;	The IESO is currently conducting its review and will report back to the Minister by January 31, 2023.	
November 10, 2021	Gate 3 Contract Negotiations on the Oneida Energy Storage Project and Lake Erie Connector Transmission Project	<p>As per the April 21, 2022 directive from the Minister, the IESO is working with Oneida Energy Storage LP to enter into a contract for their proposed storage facility.</p> <p>Per the March 31, 2022 directive from the Minister, the IESO is working with Lake Erie LP to enter into a contract by August 15, 2022, if certain conditions are met.</p>	<a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/MC-994-2021-352.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/MC-994-2021-352.ashx</a>  <a href="https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Letter-from-the-Minister-of-Energy-20220331-lake-erie-connector.ashx">https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Letter-from-the-Minister-of-Energy-20220331-lake-erie-connector.ashx</a>

- 1       b) The IESO cannot speak on behalf of government on their priorities. The IESO complies  
2       with application legislation that the IESO is bound by including Bill 124, *Protecting a*  
3       *Sustainable Public Sector for Future Generations Act, 2019* as well as Regulation 304/16:  
4       Executive Compensation Framework under the Broader Public Sector Executive  
5       Compensation Act, 2014 (BPSECA).
- 6       c) The IESO complies with application legislation that the IESO is bound by as noted  
7       response to b).

**SUP INTERROGATORY 9**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5.1-Society-9

**INTERROGATORY**

References:

D-1-3 Staffing and Compensation

Table 2: Ongoing and Planned Efforts to Make Progress towards the 50th Percentile for Total Remuneration p4

*The Power Worker's Union (PWU) Collective Agreement expired as of April 1, 2020. Through collective bargaining, the PWU salary increases were set at 1% for the April 1, 2020 to March 31, 2021 period (one- year contract). The IESO is currently in negotiations for the contract beginning April 1 2021.*

*Society's Collective Agreement expired as of December 31, 2021. The IESO and Society engaged in collective bargaining in 2021 which resulted in an arbitrated settlement of a 1% economic salary increase for 2022. The terms of the Collective Agreement are in place for 2022 and will expire as of December 31, 2022.*

Exhibit D-1-3 Attachment 3, "Non-Executive Total Remuneration Review", Mercer dated 2022 February 18. p4

*All compensation data are reflective of the most recently available data as of April 1, 2021, and are aged to reflect April 1, 2022 compensation levels, based on sector.*

a) As per the first reference, SUP wages in 2022 were increased by 1% and PWU's wages have not been increased since 2020. Meanwhile inflation in Canada in 2021 and 2022 has exceeded 3% and 5% respectively<sup>1</sup>. As per Mercer, how has this impacted SUP's and PWU's as well as IESO's overall standing in its remuneration review where it has "aged" data from April 1, 2021 to reflect April 1, 2022 compensation levels? Or has Mercer not taken this into account? Please explain Mercer's rationale for the methodology which it has applied.

b) As per Mercer, how would the referenced contract wage increases impact SUP's and PWU's as well as IESO's overall standing in a remuneration review based on 2022 compensation data?

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<sup>1</sup> EB-2021-0110 Exhibit O-1-2 Attachment 1.1 p2 Scotiabank Inflation Forecast dated 2022-03-31 "Our forecast is for Canadian inflation to equal 5.9% in 2022, 3.1% in 2023, 2 1/2% in 2024 and then return toward the Bank of Canada's 2% inflation target in subsequent years."

**RESPONSE**

- a) Market compensation information in published compensation surveys was reflective of 2021 information. As such, market information was aged to an effective date of April 1, 2022 based on market movements as per the Conference Board of Canada's and Mercer's Canadian Compensation Planning survey, which gathers information on merit increases and salary structure adjustments from organizations across the public and private sectors
- b) Mercer anticipates that the IESO's positioning relative to the market would decrease. The SUP and PWU increases of 1% are less than the reported average Canadian market movement in our surveys, bringing them closer to the 50<sup>th</sup> percentile.

**SUP INTERROGATORY 10**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5.1-Society-10

**INTERROGATORY**

References:

D-1-3 Staffing and Compensation

Table 2: Ongoing and Planned Efforts to Make Progress towards the 50th Percentile for Total Remuneration p4,5

***Negotiated plan changes, not yet implemented, that will have a positive impact on future cost containment***

- *Effective March 31, 2025 the undiscounted early retirement rule for PWU and Society will change to reflect the Rule of 85 (age & service) from the Rule of 82. This will ensure employees have to contribute to their pensions for a longer period of time, reducing the cost burden on the IESO.*

- *Effective March 31, 2025 an averaging period of 60 months, rather than 36 months, will determine pensionable earnings for both PWU and Society.*

Exhibit D-1-3 Attachment 3, "Non-Executive Total Remuneration Review", Mercer dated 2022 February 18. p4

*For the retirement and benefits program review, Mercer benchmarked the IESO against the energy, private and public sector peer groups for organizations available in the Mercer Plan Design databases considering their relative employer provided value ("EPV"). Relative value analysis focuses only on the plan design as it sets all other cost drivers at a common level and is more consistent when comparing the value of the benefit programs of several organizations.*

As per the first reference, effective March 31, 2025 both SUP and PWU represented employees will contribute to the pension plan for three additional years and newly retired staff after that date will collect a smaller annual pension [due to the calculation being based on the last five years of pensionable earnings in place of the last three years].

- a) Please explain in detail how this material reduction in IESO's pension liability has been reflected in Mercer's retirement and benefits program review as provided in the second reference. If this has not been reflected in the Mercer remuneration review, please explain in detail Mercer's rationale for ignoring this material reduction in IESO's pension liability.

1    **RESPONSE**

- 2           a) The early retirement rule change to use the Rule of 85 (age & service), and earnings  
3           averaging period of 60 months for service accrued from March 31, 2025 has not been  
4           reflected in the calculation of the pension value for PWU and Society members. The  
5           pension value is calculated as the value of the pension for one year of future accrual to  
6           be comparable to other elements of compensation. Since PWU and Society members will  
7           still be accruing pension benefits under the current provisions for additional years, the  
8           value of the current provisions best reflects that one-year pension accrual.

**SUP INTERROGATORY 11**

Issue 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

5.1-Society-11

**INTERROGATORY**

Reference: D-1-3 Staffing and Compensation

Table 2: Ongoing and Planned Efforts to Make Progress towards the 50th Percentile for Total Remuneration p7

***Target Area:*** Culture and Values

***Ongoing and planned efforts to align Total Remuneration to the 50th percentile:***

Continue to focus on initiatives that support engagement, productivity and help retain and attract a diverse workforce

- Ongoing embedding of the IESO Values
  - Ongoing recognition of employee accomplishments through the Employee Recognition Program
  - Ongoing embedding of the Learning and Development Framework
  - Ongoing focus on the action plan in support of the Equity, Diversity and Inclusion Strategy
  - Labour Relations Strategy that continues to recognize the principles of aligning Total Remuneration to the 50th percentile
- a) Please explain how each of the initiatives in a) are being achieved e.g. how is the “ongoing embedding of the IESO Values” being achieved.
- b) How will the IESO's pursuit of 50th percentile salaries impact its ability to attract and retain talent? Please explain.
- c) What impact has the tightening labour market, increased labour-side wage pressures, and persistently high inflation had on the IESO's pursuit of 50th percentile wages?

**RESPONSE**

- a) As the IESO progresses towards the 50<sup>th</sup> percentile, the initiatives noted below assist in the IESO's ability to attract and retain employees at the 50th percentile. As the IESO continue to make changes to the Total Remuneration it is critical that the IESO balance the changes with experiential initiatives. The initiatives noted in the Culture and Values sections of the referenced Exhibit D-1-3 – Staffing and Compensation, Table 2, are all initiatives that the IESO has focused on over 2021 and into 2022. Some of the embedment and focus of these initiatives include;



- i. Inclusion of the IESO Values in the IESO's strategy
- ii. Monthly communications and promotion of the IESO Recognition programs (peer to peer, service awards, annual events)
- iii. Robust Learning and Development initiatives including Learning Week, Harvard Mentor and Business Learning opportunities

Equity, Diversity and Inclusion (ED&I), along with the strategy, is a primary focus for the IESO. Below are some of the specific initiatives that were a focus in 2021 and continue to be in 2022;

- iv. All employees shared an objective related to modelling behaviours consistent with the IESO's values, and the vision for equity, diversity and inclusion (ED&I) in 2021
  - v. Members of the executive team participated in an executive 360 and coaching program, specific to ED&I, to better understand inclusive leadership gaps and strengths
  - vi. All of the IESO's leaders participated in an Inclusive Leadership program in 2021, designed to help leaders discover how diversity can elevate successful teams, and foster an inclusive environment where employees feel valued, trusted, and safe
  - vii. Approximately 20% of individual contributors participated in the Conscious Inclusion program in 2021, focuses on three key actions for conscious inclusion: own up (when we recognize our own biases), speak up (when we address exclusion and injustice); and, lift up (when we practice small acts of inclusion and micro-affirmations)
  - viii. In late 2021, the IESO conducted an assessment of its performance and talent practices, to identify areas for improvement to strengthen the fairness, inclusivity and objectivity of these practices
  - ix. The IESO celebrated a number of cultural days/ months of significance in 2021, including Black History Month, Pride, and Indigenous History Month among others; in addition, eight virtual events were held on topics like Black equity and inclusion, Indigenous History and Culture in Canada, LGBTQ2S+ inclusion and gender biases in the workplace
  - x. The IESO participated in a number of external conferences and panels related to ED&I, publicly highlighting the organization's commitment to this work
  - xi. The IESO signed Electricity Human Resources Canada's Leadership Accord on Equity, Diversity and Inclusion, a public commitment to integrate and prioritize ED&I as an organization
  - xii. The IESO became an Employer Partner of the Canadian Centre for Diversity & Inclusion, providing employees with access to ED&I content, like webinars, podcasts, and toolkits
- b) The IESO is cognisant that some roles are in high demand and are highly competitive in nature. This has been identified as an enterprise risk that is being mitigated through the development of Workforce Planning methodology, Talent Acquisition strategy, enhancement of the Recruitment platform as well as the development of an Employee Value Proposition.

- 1 c) Over the last year, like for many other organizations, talent has been in high demand
- 2 and as noted above, the IESO continues to look at its programs and strategies to ensure
- 3 that candidates continue to be attracted to and retained within the IESO.