June 15, 2023

VIA Email and RESS



Independent Electricity System Operator 1600-120 Adelaide Street West

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

Dear Ms. Marconi,

### Re: Independent Electricity System Operator 2023, 2024, and 2025 Revenue Requirement Submissions Interrogatory Responses Ontario Energy Board File No.: EB-2022-0318

The Independent Electricity System Operator (IESO) is writing to file interrogatory responses (IRRs) in accordance with the Ontario Energy Board's (OEB) Procedural Order No. 1 dated May 4, 2023.

The IESO notes that some interrogatories have raised questions/issues which the IESO believes are beyond the scope of this proceeding. The IESO has, in some cases, provided responses in an effort to be of assistance to the parties. The fact that the IESO has provided an answer to these interrogatories should not be taken as an indication that the IESO considers these areas of enquiry to be appropriate for this revenue requirement proceeding.

With its filing, the IESO has included an updated exhibit list. The IRRs have been organized by issue according to the Final Issues List in the OEB's Decision on Issues List dated May 19, 2022.

The updated exhibit list and the chart below help to illustrate this. For example, each IRR has specific references in the header such as: **Exhibit H** - representing interrogatories, **Tab** - representing the issue, **Schedule** – numbered to represent the party, followed by the file name which includes the issue, party, and interrogatory# (e.g., Exhibit H, Tab 1.0, Schedule 3 - 1.0 AMPCO 1, is the reference to the IESO's response to AMPCO Interrogatory 1 under issue 1.0).

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Parties	Schedule #
OEB STAFF	1
APPrO	2
AMPCO	3
CME	4
REASCWA	5
EDA	6
EP	7
ED	8
HQEM	9
PWU	10
SEC	11
SUP	12
VECC	13

Schedule numbers have been assigned as follows:

### **Confidentiality Request**

In accordance with Rule 10 of the OEB's Rules of Practice and Procedure and section 5.1 of the OEB's Practice Direction on Confidential Filings, the IESO requests confidential treatment for Exhibit H, Tab 1.7 - Schedule 3.17 – 1.7 AMPCO 17, Attachment 1 - HUB Exception Report.

The IESO requests confidential treatment for the redacted portions in the attachments because they contain information that relates to the IESO's IT systems which if disclosed would create a cyber security risk that would allow for a threat actor to gain insights into IESO systems and status that could be used for malicious purposes. As well, disclosing the names of individuals and detailed document IDs, or other identifiers, provide specifics that would enhance attacks against the IESO, such as phishing and impersonation attacks, that could allow a threat actor to obtain sensitive information. Individual names also constitute personal information and are not relevant to the proceeding.

A table specifying the rationale for the information requested to be redacted is attached as "Appendix A". The IESO notes that the items that have been redacted from the documents that are the subject of this confidentiality request, have no bearing in the consideration of any issues in this proceeding.

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Please contact me directly at 416-710-0620 or at <u>Beverly.Nollert@ieso.ca</u> if you have any questions.

Yours truly,

Beverly Nollert Senior Manager, Regulatory Affairs

cc: Mr. Patrick Duffy, Stikeman & Elliott (email) All EB-2022-0318 Intervenors (email)

## Appendix A

## CONFIDENTIALITY REQUEST TABLE

# Exhibit H, Tab 1.7 - Schedule 3.17 – 1.7 AMPCO 17, Attachment 1 - HUB Exception Report

Item	Page	Rationale for Redaction
1	1	Document ID – redacted for cyber security and relevance
2	1	Personal information - redacted for cyber security and relevance
3	1	Personal information - redacted for cyber security and relevance
4	1	Project ID - redacted for cyber security and relevance
5	2	Internal IESO systems – redacted for cyber security and relevance
6	3	Internal IESO systems – redacted for cyber security and relevance
7	3	Internal IESO systems – redacted for cyber security and relevance
8	3	Internal IESO systems – redacted for cyber security and relevance
9	6	Internal IESO systems – redacted for cyber security and relevance
10	6	Personal information - redacted for cyber security and relevance
11	6	Personal information - redacted for cyber security and relevance
12	6	Personal information - redacted for cyber security and relevance
13	6	Personal information - redacted for cyber security and relevance
14	6	Personal information - redacted for cyber security and relevance
15	6	Personal information - redacted for cyber security and relevance
16	6	Personal information - redacted for cyber security and relevance
17	6	Personal information - redacted for cyber security and relevance
18	7	Personal information - redacted for cyber security and relevance
19	7	Personal information - redacted for cyber security and relevance
20	7	Internal IESO systems – redacted for cyber security and relevance