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June 21, 2023

Via RESS & Email

Patrick G. Duffy
Partner
Stikeman Elliot LLP
5300 Commerce Court West
199 Bay Street
Toronto ON M5L 1B9

Dear Mr. Duffy:

**Re: EB-2022-0318: Independent Electricity System Operator (IESO) 2023-2025
Revenue Requirement Application of APPrO**

We write to provide clarification to the IESO on APPRO's interrogatories 12(b) and (c), on the intended meaning of "capacity import calls" and "capacity export calls".

As defined in Chapter 11 of the IESO market rules, "capacity import call" means "an energy import from an external control area that is supported by the capacity of a generation unit or the capacity for injection of an electricity storage unit within the external control that has committed its capacity, or a portion thereof, to the IESO control area and that capacity has been called by the IESO in accordance with section 19.9 or 19.9B of Chapter 7". We use the phrase "capacity export call" in lieu of "capacity export request" as also defined in Chapter 11 of the IESO market rules.¹

Please advise if the IESO requires any additional information to respond to APPrO interrogatories 12(b) and (c), otherwise we look forward to receiving responses before the scheduled Settlement Conference.

Thank you.

¹ While we understand that capacity exports will not be fully implemented before the completion of MRP implementation in May 2025, we pose the question in respect of the June 2025 to December 2025 period.]

Yours truly,

McCarthy Tétrault LLP

Per:

A handwritten signature in blue ink, appearing to read 'Reena Goyal', with a stylized, cursive script.

Reena Goyal

RG/jk

cc: Mr. David Butters, President & CEO, APPrO
Ms. Nancy Marconi, Registrar, OEB