



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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April 10, 2024  
Our File: EB20240004

**Attn: Nancy Marconi, Registrar**

Dear Ms. Marconi:

**Re: EB-2024-0004 – IESO 2024-2025 – SEC Interrogatories**

We are counsel to the School Energy Coalition ("SEC"). Enclosed, please find SEC's interrogatories in this matter.

Yours very truly,  
**Shepherd Rubenstein P.C.**

Mark Rubenstein

cc: Brian McKay, SEC (by email)  
Applicant and intervenors (by email)

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** subsection 25(1) of the *Electricity Act*, 1998;

**AND IN THE MATTER OF** a submission by the Independent Electricity System Operator to the Ontario Energy Board for the review of its proposed expenditure and revenue requirements for the fiscal years 2024 to 2025 and the fees it proposes to charge during the fiscal years 2024 to 2025.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**1.1-SEC-1**

[IESO Letter, March 20, 2024] The IESO states in its letter: “The adjustment mechanism in the Settlement Proposal was designed to provide the OEB and interveners with assurance that the IESO would review the appropriateness of its usage fees in the event of a negative Forecast Variance and Deferral Account balance at the end of Year 1 to avoid or minimize the use of debt. The existence of the adjustment mechanism in the Settlement Proposal does not preclude the IESO from seeking to adjust its usage fee during the three-cycle in the event of unplanned increases in operating costs in response to changes in government policy.”

Please provide all references in the EB-2022-0318 record that show the IESO did not intend that their proposed adjustment mechanism did not “preclude the IESO from seeking to adjust its usage fee during the three-cycle in the event of unplanned increases in operating costs in response to changes in government policy.”

**1.1-SEC-2**

[All Intervenors CQ #2] Please confirm that the answer to part (b) is no, the IESO did alert parties to the agreement about the Minister’s letter and the potential for a need to modify the settlement agreement.

**1.1-SEC-3**

[All Intervenors CQ #11, #12, #13] Please update the tables in each clarification response to account for changes to the 2015 volume forecast based on the 2024 Annual Planning Outlook.

**1.1-SEC-4**

Please provide a table that shows the revised year-end balance of the FVDA balance for each of 2024 and 2025, based on currently approved usage fees for 2024 and 2025, based on a) the Application as filed, and b) revised information on 2023 actual costs, and updated volume forecasts.

**2.1-SEC-5**

[All Intervenor CQ #14] Please provide a copy of all instructions to, and responses from, each IESO business unit and division regarding incremental resources and/or costs required to complete the work outlined in the Minister's letter regarding Powering Ontario's Growth plan.

**2.1-SEC-6**

[All Intervenor CQ #1] The IESO was asked to provide the incremental budgets for each of the activities contained in the Minister's letter regarding the Powering Ontario's Growth plan. In its response, it states that the IESO does not budget by activity and so cannot respond to the question. Please provide a breakdown of the incremental costs sought for approval for each year, by each of the activities set out in the Minister's letter regarding the Powering Ontario's Growth plan. As the IESO does not budget based on activity, please attempt to breakdown the costs by activity using simplifying assumptions. Please detail those assumptions.

**2.3-SEC-7**

[OEB Staff CQ #1c] Please explain why certain incremental costs require a change in the IESO's fees (i.e. those related to the Power Ontario's Growth Plan), and others do not (i.e. impact of Bill 124).

**2.3-SEC-8**

Please confirm that if the OEB does not approve the application, the IESO can still incur incremental costs which will be captured as part of the approved FVDA.

**3.1-SEC-9**

[F-1-1, p.3, Table 1; All Intervenor CQ #13] Considering the updated 2024 revenue forecast indicates that the year-end FVDA balance has decreased from -5.5M to -0.1M, please explain why any 2024 fee increase is required.

**3.1-SEC-10**

Based on the most up to date information (i.e. 2023 actuals, and 2024 and 2025 revenue forecast), please provide the updated proposed 2024 and 2025 fees.

Respectfully, submitted on behalf of the School Energy Coalition, this April 10, 2024.

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Mark Rubenstein  
Counsel for the School Energy Coalition