

**EB-2023-0004**  
**Independent Electricity System Operator**

**Application for 2024 and 2025 Fees, Expenditures and Incremental Revenue Requirement**

**AMPCO Interrogatories April 10, 2024**

**AMPCO-1**

Ref: EB-2022-0318 IESO 2023-2025 Expenditures, Revenue Requirement, and Fees

As stated in the Decision and Order for the IESO's 2023, 2024 and 2025 expenditures, revenue requirement, and fees (previous application), the IESO may seek OEB approval to adjust the approved expenditures, revenue requirement, and fees in the event of a material unforeseen change. However, this would only occur if the balance of the Forecast Variance Deferral Account (FVDA) is less than zero in Year 1 of the three-year cycle, and any adjustment would be for Year 3. The IESO's current application does not rely on the adjustment mechanism described in the OEB-approved Settlement Agreement in EB-2022-0318.

Please explain why the IESO does not consider Ministerial Directives in the category of "material unforeseen change."

**AMPCO-2**

Please provide the IESO's materiality threshold.

**AMPCO-3**

Please provide the cost savings due to vacant positions to date in 2024.

**AMPCO-4**

In light of 2023 actuals, please explain in detail why the new expenses for 2024 cannot be managed within the IESO's approved funding inclusive of operating reserve.

**AMPCO-5**

Ref: OEB staff Clarification Question 4

The responses states "The 2023 year-end balance in the FVDA is \$10.2 million compared to \$2.6 million in the Interim Year Business Outlook. This variance resulted from a reduced operating

deficit compared to that forecast in the Interim Year Business Outlook, driven primarily by higher than expected demand volumes, and various other operational savings

- a) Please identify and quantify the operational savings in 2023.
- b) Please provide the current operational savings in Q1 2024 and the drivers.

#### AMPCO-6

Ref: OEB staff Clarification Question 5

- a) Please confirm there are lower than expected FTEs at the beginning of the year in 2024.
- b) The response in Clarification Question 5 states “The 2023 actual average FTE was slightly below the forecast due to some vacancies taking longer time to fill than expected.”

Please explain why some vacancies are taking a longer time to fill than expected and if these issues persist, or if there are new issues that have arisen with respect to filling vacancies in 2024.

#### AMPCO-7

Ref: Exhibit D-1-3, Attachment 1

- a) Please confirm the \$3.1 million compensation and benefits budget for 2024 assumes all 22 FTEs are hired January 1, 2024.
- b) Please confirm the \$4.7 million compensation and benefits budget for 2025 assumes all 22 FTEs are hired and the additional 8 FTEs in 2025 are hired January 1, 2025.
- c) With respect to the 22 incremental FTEs in 2024, how many have been hired to date?

#### AMPCO-8

Exhibit B-1-1, Minister's Letter on Powering Ontario's Growth Appendix

Please provide the IESO's current workplan to address the seven initiatives in the Minister's Letter.

#### AMPCO-9

Ref: Exhibit C Tab 2 Schedule 1 Page 2

a) Please update Table 2 to reflect current energy volumes.

b) Please update Table 3.

c) Please update Table 4.

AMPCO-10

Ref: Exhibit F Tab 1 Schedule 1 Page 3

Please update Table 1 to include 2023 actuals and updates for 2024 and 2025.