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November 7, 2025

**By Email and RESS**

File No.: 1019261185

Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

Attention: Ritchie Murray, Acting Registrar

Dear Mr. Murray:

**Re: Independent Electricity System Operator, in its Capacity as the Smart Metering Entity (“SME”)  
Application to Approve Fees for Providing Third Party Access to Smart Metering Data and to amend Section 6.1 of the Smart Metering Entity Licence  
OEB File No. EB-2025-0272**

We are counsel to the IESO in its capacity as the SME. On behalf of the SME, we are filing the enclosed application to approve the SME’s fees for providing expanded third party access to smart metering data (“TPA”) and to amend section 6.1 of the Smart Metering Entity Licence (ES-2021-0191).

For the reasons detailed in the application, we request that the OEB dispose of this application without a hearing, pursuant to paragraph 21(4)(b) of the *Ontario Energy Board Act, 1998*, as no other person will be adversely affected in a material way by the outcome of the proceeding.

On December 16, 2024, the SME submitted a report titled “Assessment of Expanding Third Party Access to SME Data Beyond Currently Approved Parties” to the OEB and provided a copy to all intervenors in EB-2021-0292. In the assessment, the SME concluded there is strong market interest in smart metering data, and that expanding TPA would provide benefits to both SME ratepayers and energy sector participants and is unlikely to create any incremental risks. No questions or comments were received from staff or intervenors in response to the SME’s assessment.

We request that the report entitled *Assessment of Risks & Opportunities with Expanding Third Party Access to Smart Metering Entity Data* dated September 23, 2024 prepared by Accenture Inc. (Exhibit B-1-3) be filed on a confidential basis in accordance with the OEB’s *Practice Direction on Confidential Filings* (the “**Practice Direction**”). Confidential treatment of the Accenture report, which assesses the risks of expanded TPA including grid security and market manipulation, meets factors (a)(iv), (b) and (c) of Appendix A of the Practice Direction. An unredacted version of the report will be filed separately from the application.

The SME confirms that the documents filed in support of the application do not contain personal information, as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*, that has not otherwise been redacted.

Please contact me or Phillip Chisulo at [phillip.chisulo@ieso.ca](mailto:phillip.chisulo@ieso.ca) if you have any questions about the SME's application.

Yours truly,

A handwritten signature in black ink, appearing to read "PD - H".

Patrick G. Duffy

PGD/sb

Enclosure

cc. Phillip Chisulo, IESO