

Patrick G. Duffy  
Direct: +1 416 869 5257  
PDuffy@stikeman.com

April 22, 2026

**By Email and RESS**

File No.: 1019261183

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 (“IESO”)  
2026, 2027 and 2028 Fees, Expenditure and Revenue Requirement Submissions  
Ontario Energy Board File No. EB-2025-0302**

On behalf of the IESO, we are filing the enclosed applications under subsection 25(1) of the *Electricity Act, 1998* for approval of the IESO’s proposed expenditures, revenue requirements and fees for the 2026, 2027 and 2028 years (the “**2026-2028 Revenue Requirement Submission**”).

The 2026-2028 Revenue Requirement Submission is predicated upon the IESO’s 2026-2028 Business Plan (the “**Business Plan**”), which was approved by the Minister of Energy and Mines under section 24 of the *Electricity Act, 1998* by way of a letter dated March 27, 2026 (the “**Approval Letter**”). The Minister’s approval binds the IESO to deliver the plan’s activities within the approved budget.

## **Procedural Efficiencies**

With the Minister’s approval of the Business Plan, the IESO is authorized under section 25 of the *Electricity Act, 1998* to proceed with the filing of the 2026-2028 Revenue Requirement Submission. In the Approval Letter, the Minister expressed support for timely consideration of the 2026-2028 Revenue Requirement Submission by the Board, including through approaches such as a streamlined review.

Given the IESO’s not-for-profit status, public interest mandate and oversight by the Minister, the IESO is requesting a streamlined review of the 2026-2028 Revenue Requirement Submission that will focus the scope of the Board’s review within the existing legislative boundaries, accelerate regulatory approval and minimize procedural complexity. The IESO recognizes that it is also important that the streamlined review maintains transparency, fairness and provides an opportunity for interested parties to undertake a substantive review of the IESO’s evidence.

The IESO is requesting the Board adopt the following steps for the determination of the 2026-2028 Revenue Requirement Submission in the first Procedural Order:

1. Approve the draft Issues List attached as Appendix “A” to ensure that the scope of the review is limited to the alignment of the proposed expenditures and revenue requirements with the Minister-approved Business Plan and the setting of the appropriate fees.
2. Establish a Board staff-led interrogatory process in which staff will issue their interrogatories based on the Issues List and invite intervenors to review. A comment period will follow, during which intervenors may propose additional interrogatories. Board staff will determine which of the intervenor-proposed interrogatories to include in the final set. By utilizing this process, the IESO requests that it be provided with two weeks (10 business days) to file its responses to the interrogatories on the public record.
3. Direct that the evidentiary record close upon the IESO’s submission of its responses to interrogatories and that the matter be submitted to the presiding Commissioners for a decision on whether to approve the IESO’s proposed expenditures, revenue requirements and fees or refer them back to the IESO for further consideration with the Board’s recommendations.

The proposed steps are consistent with the Board’s adoption of active adjudication to enable more efficient and cost-effective regulatory proceedings in accordance with Rule 26.01 of the Board’s *Rules of Practice and Procedure*.

## Notice of Hearing

The IESO proposes that the Board’s Notice of Hearing (the “**Notice**”) be given in the following manner:

1. The IESO shall post the Notice and a link to the OEB’s webpage, where all official documents in this application will be posted, on the OEB Applications section of the IESO’s Regulatory Accountability webpage: <https://www.ieso.ca/en/Corporate-IESO/Regulatory-Accountability/OEB-Applications>.
2. The IESO shall post an announcement, in English and French, on the IESO’s News Releases webpage: <https://www.ieso.ca/en/Corporate-IESO/Media/News-Releases>.
3. The IESO shall email the announcement to all market participants and interested parties who are registered to receive IESO news and other communiqués (this includes all connection proponents with respect to whom the IESO maintains a public registry).
4. The IESO shall serve an electronic copy of the Notice and the 2026-2028 Revenue Requirement Submission, including the pre-filed evidence, on all registered intervenors in its two most recent IESO revenue requirement submission proceedings (EB-2022-0002 and EB-2024-0004).
5. The IESO shall provide an electronic copy of the Notice, the the 2026-2028 Revenue Requirement Submission and the evidence, and any amendments thereto, to anyone requesting these materials.

## Confidentiality Request

In accordance with Rule 10 of the Board’s *Rules of Practice and Procedure* and section 5.1 of the *Practice Direction on Confidential Filings*, the IESO requests confidential treatment for the following pages of the exhibits:

- Exhibit E, Tab 2, Schedule 1, Attachment 8 – Project Charter for: Storage and Hybrid Integration

- Exhibit E, Tab 2, Schedule 1, Attachment 9 – Project Charter for: ERP Distributed Energy Resources (DER) Integration Project

(collectively, the “**Attachments**”).

The IESO requests confidential treatment for the redacted portions in the Attachments because they contain information that relates to the IESO’s projects which, if disclosed, would reveal the names of individuals and 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 “B”. 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.

The IESO 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 the undersigned or Gisselle Lopez directly at 905-855-4203 or at [Gissella.Lopez@ieso.ca](mailto:Gissella.Lopez@ieso.ca) if you have any questions about the 2026-2028 Revenue Requirement Submission.

Yours truly,

Patrick G. Duffy

PGD/sb

cc. Gisselle Lopez, IESO

## **Appendix “A” Draft Issues List**

### **Issues**

#### **1.0 Revenue Requirement, Operating Costs and Capital Spending**

- 1.1 Is the IESO’s Fiscal Year 2026 revenue requirement of \$328.8 million aligned with the Minister’s approved Business Plan?
- 1.2 Is the IESO’s Fiscal Year 2027 revenue requirement of \$357.2 million aligned with the Minister’s approved Business Plan?
- 1.3 Is the IESO’s Fiscal Year 2028 revenue requirement of \$364.4 million aligned with the Minister’s approved Business Plan?
- 1.4 Is the IESO’s 2026 projected staffing levels and compensation (including salaries, benefits, pensions and other post-employment benefits) aligned with the Minister’s approved Business Plan?
- 1.5 Is the IESO’s 2027 projected staffing levels and compensation (including salaries, benefits, pensions and other post-employment benefits) aligned with the Minister’s approved Business Plan?
- 1.6 Is the IESO’s 2028 projected staffing levels and compensation (including salaries, benefits, pensions and other post-employment benefits) aligned with the Minister’s approved Business Plan?
- 1.7 Is the IESO’s 2026 capital expenditure budget of \$60.5 million aligned with the Minister’s approved Business Plan?
- 1.8 Is the IESO’s 2027 capital expenditure budget of \$58.4 million aligned with the Minister’s approved Business Plan?
- 1.9 Is the IESO’s 2028 capital expenditure budget of \$51.1 million aligned with the Minister’s approved Business Plan?

#### **2.0 Usage Fees**

- 2.1 Is the methodology used to derive the IESO’s proposed 2026 Usage Fees to be paid commencing January 1st, 2026 appropriate?
- 2.2 Is the methodology used to derive the IESO’s proposed 2027 Usage Fees to be paid commencing January 1st, 2027 appropriate?
- 2.3 Is the methodology used to derive the IESO’s proposed 2028 Usage Fees to be paid commencing January 1st, 2028 appropriate?
- 2.4 Is the IESO’s proposal to charge or rebate the difference between the approved 2026 IESO Usage Fees and the interim fees following OEB approval in accordance with the Settlement Schedule and Payment Calendar posted by the IESO on its website<sup>1</sup> appropriate?
- 2.5 Is the proposed January 1st, 2027 effective date for the IESO’s 2027 Usage Fees appropriate?
- 2.6 Is the proposed January 1st, 2028 effective date for the IESO’s 2028 Usage Fees appropriate?

#### **3.0 Other Fees**

- 3.1 Is the IESO’s proposal to charge organizations an Application Fee of \$2,000 to process a market registration application to participate in the IESO-administered markets appropriate?
- 3.2 Is the IESO’s proposal to charge proponents a Registration Fee of up to \$2,000 to participate in an Electricity Service Procurement and Program appropriate?
- 3.3 Is the IESO’s proposal to charge proponents a Submission Fee for Electricity Service Procurement and Programs of up to \$25,000 to evaluate and process a submission in response to a Request for Qualification (RFQ), Request for Proposals (RFP), or other solicitation in an Electricity Service Procurement and Program appropriate?

- 3.4 Is the IESO's proposal to charge proponents a System Impact Assessment Fee at an hourly rate of \$190/hr to assess the impact of a new or modified connection to the IESO controlled grid appropriate?
  - 3.5 Is the IESO's proposal to charge proponents an Expedited System Impact Assessment Fees at an hourly rate of \$190/ hr to assess the impact of a new or modified connection to the IESO controlled grid appropriate?
  - 3.6 Is the IESO's proposal to charge proponents a Technical Feasibility Study Fee at an hourly rate of \$190/hour for activities of \$190/ hr to assess the impact of a new or modified connection to the IESO controlled grid appropriate?
  - 3.7 Is the IESO's proposal to charge proponents a Reliable Integration Fee at an hourly rate of \$190/hour for activities the IESO undertakes to reliably integrate new or modified facilities to the IESO-Controlled Grid appropriate?
  - 3.8 Is the IESO's proposal to charge proponents a Transmission Registration Fee of \$2,000 per registration, payable every 24 months from the original registration date to review, process and maintain applications to the Transmission Procurement Registry appropriate?
  - 3.9 Is the IESO's proposal to charge a Transmission Procurement Submission Fee of \$100,000 for transmission projects with an estimated capital cost of less than \$500 million, \$150,000 for transmission projects with an estimated capital cost of \$500 million to less than \$1 billion and \$200,000 for transmission projects with an estimated capital cost of \$1 billion or greater to evaluate submissions appropriate?
  - 3.10 Is the IESO's proposal to charge participants Training Fees of \$180 per person from January 1, 2027 to December 31, 2027, and \$225 per person as of January 1, 2028 for half day public courses, \$420 per person from January 1, 2027 to December 31, 2027, and \$525 per person as of January 1, 2028 for full day public courses, and \$900 per course from January 1, 2027 to December 31, 2027, and \$1,125 per course as of January 1, 2028 for half day private courses and \$1,800 per course from January 1, 2027 to December 31, 2027, and \$2,250 per course as of January 1, 2028 for full day private courses appropriate?
- 4.0 Operating Reserve**
- 4.1 Is the IESO's proposal for a proposed Operating Reserve of \$30 million in the Forecast Variance Deferral Account (FVDA) aligned with the Minister's approval in the Business Plan?
- 5.0 Commitments from Previous OEB Decision**
- 5.1 Has the IESO responded appropriately to outstanding OEB directions from previous proceedings?

**Appendix "B"**  
**Confidentiality Request Table**

**Exhibit E, Tab 2, Schedule 1, Attachment 8 – Project Charter for: Storage and Hybrid Integration**

<b>Item</b>	<b>Page</b>	<b>Rationale for Redaction</b>
1.	1	Document ID – redacted for cyber security and relevance
2.	1	Personal information
3.	1	Personal information
4.	1	Personal information
5.	1	Personal information
6.	9	Personal information
7.	9	Personal information
8.	9	Personal information
9.	9	Personal information
10.	9	Personal information
11.	9	Personal information
12.	9	Personal information
13.	9	Personal information
14.	9	Personal information
15.	9	Personal information
16.	9	Personal information
17.	9	Personal information
18.	9	Personal information
19.	9	Personal information
20.	10	Personal information
21.	10	Personal information
22.	10	Personal information
23.	10	Personal information
24.	10	Personal information
25.	10	Personal information
26.	10	Personal information
27.	10	Personal information
28.	10	Personal information
29.	10	Personal information
30.	10	Personal information
31.	10	Personal information
32.	10	Personal information
33.	10	Personal information
34.	10	Document ID – redacted for cyber security and relevance
35.	10	Document ID – redacted for cyber security and relevance
36.	10	Document ID – redacted for cyber security and relevance
37.	11	Document ID – redacted for cyber security and relevance
38.	11	Document ID – redacted for cyber security and relevance

**Exhibit E, Tab 2, Schedule 1, Attachment 9 – Project Charter for: ERP Distributed Energy Resources (DER) Integration Project**

<b>Item</b>	<b>Page</b>	<b>Rationale for Redaction</b>
1.	1	Document ID – redacted for cyber security and relevance
2.	1	Personal information
3.	1	Personal information
4.	5	Personal information
5.	5	Process and System Information
6.	5	Process and System Information
7.	5	Process and System Information
8.	5	Process and System Information
9.	5	Process and System Information
10.	5	Process and System Information
11.	6	Process and System Information
12.	6	Process and System Information
13.	6	Process and System Information
14.	6	Process and System Information
15.	6	Process and System Information
16.	6	Process and System Information
17.	6	Process and System Information
18.	6	Process and System Information
19.	6	Process and System Information
20.	6	Process and System Information
21.	6	Process and System Information
22.	6	Process and System Information
23.	6	Process and System Information
24.	6	Process and System Information
25.	6	Process and System Information
26.	6	Process and System Information
27.	6	Process and System Information
28.	6	Process and System Information
29.	6	Process and System Information
30.	6	Process and System Information
31.	6	Process and System Information
32.	6	Process and System Information
33.	6	Process and System Information
34.	6	Process and System Information
35.	6	Process and System Information
36.	6	Process and System Information
37.	6	Process and System Information
38.	6	Process and System Information
39.	6	Process and System Information
40.	7	Process and System Information
41.	7	Process and System Information
42.	7	Process and System Information
43.	7	Process and System Information
44.	7	Process and System Information
45.	7	Process and System Information
46.	12	Personal information
47.	20	Personal information
48.	20	Personal information
49.	20	Personal information

50.	20	Personal information
51.	20	Personal information
52.	21	Personal information
53.	21	Personal information
54.	21	Personal information
55.	21	Personal information
56.	21	Personal information
57.	21	Personal information
58.	21	Personal information
59.	21	Personal information
60.	21	Personal information
61.	21	Personal information
62.	21	Personal information
63.	21	Personal information
64.	21	Personal information
65.	21	Personal information
66.	21	Personal information
67.	21	Personal information
68.	21	Personal information
69.	21	Personal information
70.	21	Personal information
71.	21	Personal information
72.	22	Document ID – redacted for cyber security and relevance
73.	22	Document ID – redacted for cyber security and relevance
74.	22	Document ID – redacted for cyber security and relevance
75.	22	Document ID – redacted for cyber security and relevance