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**By E-mail and RESS**

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

**Attention: Ritchie Murray, Registrar**

Dear Mr. Murray:

**Re: Independent Electricity System Operator ("IESO")  
2026, 2027 and 2028 Expenditures, Revenue Requirements and Fee Submissions  
Ontario Energy Board File No. EB-2026-0142**

We write to confirm that the IESO does not object to the intervenor requests received from the following parties on the understanding that they will work to find efficiencies where appropriate to support the Board's review process:

- Association of Major Power Consumers in Ontario (AMPCO)
- Canadian Manufacturers & Exporters (CME)
- Consumers Council of Canada (CCC)
- Electricity Distributors Association (EDA)
- Energy Probe Research Foundation
- HQ Energy Marketing Inc. (HQEM)
- Power Workers Union (PWU)
- School Energy Coalition (SEC)
- The Society of United Professionals (SUP)
- Vulnerable Energy Consumer Coalition (VECC)

Several of the intervenors commented on the IESO's proposed wording for Issues 1.1 to 1.9 and 4.1, which ask whether various cost components sought for recovery through IESO fees are "aligned with the Minister's approved Business Plan". The IESO acknowledges that the proposed wording of these issues is a departure from the approved Issues List in prior IESO revenue requirement submissions. As the IESO embarks on its second multi-year review, the IESO believes this is the right time to revisit the language of these issues rather than simply replicating what has been done in the past.

The IESO's proposed wording for above-noted issues reflects the unique aspects of the process that are built into section 25 of the *Electricity Act, 1998*. Unlike other entities regulated by the Board, the IESO is required to have its proposed business plan approved by the Minister before it can apply to the Board for review of its proposed expenditure and revenue requirements for the fiscal year and the fees it proposes to charge. As the IESO's proposed expenditure and revenue requirements are derived from the Minister-

approved business plan, it is appropriate that the issues related to those aspects of the application be specifically framed in relation to the Minister's approval. For other aspects of the application, the IESO is proposing more broadly worded issues that ask whether the proposed fees are appropriate. The IESO's proposed approach to the Issues List will focus the proceeding on the essential aspects of the application that need to be adjudicated by the Board.

Certain of the intervenors have also objected to the IESO's proposed streamlined procedure for this review. The IESO stands behind its proposal and notes that subsection 25(7) of the *Electricity Act, 1998* explicitly permits the Board to exercise its powers under section 25 without holding a hearing. It follows that the Board has broad discretion to shape the hearing process in any manner that believes will best balance the need for public transparency with efficiency. On this basis, the IESO disagrees with the suggestion made by some intervenors that its proposed process would violate the governing legislation or the requirements of procedural fairness. The Board is not required to use any specific procedures in conducting its review under section 25. The IESO reiterates that the time is right to revisit past practices and determine if it is possible to drive greater efficiencies in the review of an application that is largely derived from the Minister-approved business plan.

In the event that the Board declines to implement a Board staff-led interrogatory process, the IESO requests that it be provided with 3 weeks (15 business days) to file its responses to the interrogatories.

Yours truly,

Stikeman Elliott LLP



Patrick Duffy

PD/II

cc. Shelley Grice, Association of Major Power Consumers in Ontario  
Scott Pollock, Canadian Manufacturers & Exporters  
Lydia Salgo, Canadian Manufacturers & Exporters  
Julie Girvan, Consumers Council of Canada  
Lawrie Gluck, Consumers Council of Canada  
Brittany Ashby, Electricity Distributors Association  
Ted Wigdor, Electricity Distributors Association  
Tom Ladanyi, Energy Probe Research Foundation  
Michael Ladanyi, Energy Probe Research Foundation  
Marc-Antoine Fleury, HQ Energy Marketing Inc.  
Marie-Ève Cayer, HQ Energy Marketing Inc.  
Bayu Kidane, Power Workers Union  
Sladjana Krljanac, Power Workers Union  
Jay Shepherd, School Energy Coalition  
Mark Rubenstein, School Energy Coalition  
Rebecca Caron, The Society of United Professionals  
Bohdan Dumka, The Society of United Professionals  
Mark Garner, Vulnerable Energy Consumer Coalition