PUBLIC INTEREST ADVOCACY CENTRE
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July 9, 2026 **VIA E-MAIL**

Ritchie Murray
Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Mr. Murray:

Re: EB-2026-0142 Independent Electricity System Operator (IESO)
Application for Approval of 2026, 2027 and 2028 Revenue Requirements, Expenditures and Usage Fees

Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

Please find attached the revised interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Mark C. Garner Digitally signed by Mark C. Garner Date: 2026.07.09 21:10:37 -04'00'

Mark Garner
Consultants for VECC/PIAC

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REQUESTOR NAME	**VECC**
TO:	**IESO**
DATE:	**July 9, 2026**
CASE NO:	**EB-2026-0142**
APPLICATION NAME	**Fees 2026-2028**

EXHIBIT A - ADMINISTRATION

EXHIBIT B - BUSINESS PLAN AND FINANCIAL INFORMATION

B-VECC-1

Reference: Exhibit B-1-2, page 15 of 36 Business Plan 2026-2028

"The 2026 Revenue Requirement is driven primarily by baseline pressures, driving 32 points of the 40 per cent increase."

a) Please articulate (describe) the "baseline pressures", the "32 points" and the calculation that provides the "40 per cent increase" as set out in this reference.

B-VECC-2

Reference: Exhibit B-1-2, page 24 Business Plan 2026-2028

"*Inverter-Based Resources (IBRs) disconnecting from the grid unnecessarily and unexpectedly*."

a) The above was identified in the Enterprise Risk Management Appendix 2 of the Business Plan. Please provide a table describing the operating and capital costs for each year 2025 through 2028 on the risk mitigation of this identified risk.

B-VECC-3

Reference: Exhibit B-2-1 Attachment 3

a) Please provide the 2025 Annual Report and Audited Financial Statements.

EXHIBIT C - REVENUE REQUIREMENT AND USAGE FEES

C-VECC-4

Reference: Exhibit 1, Tab 2, Schedule 1, page 38

"*While the IESO proposes that the OEB approve a maximum Submission Fee of up to $25,000, the IESO would continue to determine the actual Submission Fee for each procurement based on multiple factors including the procurement complexity (e.g., a proposal submission under a Long-Term RFP would warrant a higher fee vs. a proposal submission under a Medium-Term RFP), so that the fee remains proportionate to the IESO's expected costs. The IESO believes that a cap rather than a set fee enables flexibility across different procurement types and stages. Per the IESO's standard practice, the fee applicable to any specific procurement or program would be established in the procurement documents (e.g., RFPs or Program Rules) and informed by stakeholder feedback before implementation."*

a) For those fees which have discretionary charge components (i.e. the charge may differ depending on circumstance) does the IESO maintain a "tariff sheet" or "rate handbook" or similar document, which provides a list of services that may be applied to the fee? If so please provide that document. If not how is a potential client able to understand if a specific service charged is allowed or approved under this fee (tariff)?

b) Does the IESO have a processes for potential clients to dispute the calculation of a specific charge? If so please describe that process.

C-VECC-5

Reference: Exhibit C-3-1, Attachment 2, page 2

"*The IESO is updating its labour rate plus overhead recovery rate from $145 per hour to $190 per hour to reflect the average increase in labour costs and overhead over the 2026-2028 period; the addition of indirect costs of labour support; and the costs associated with the development of enhanced tools and systems designed to improve service levels. The new rate is a fully allocated rate covering direct effort and indirect effort that would otherwise be borne by rate payers*."

a) Please show the derivation of the $145 hours (i.e. components and calculation) as compared to the updated $190 per hour rate.

C-VECC-6

Reference: Exhibit C-3-1, Attachment 2, page 2

"*At present, no formal fee structure exists for competitive transmission procurements in Ontario. This proposal establishes a fair, transparent, and sustainable cost-recovery framework that reflects the scale and complexity of transmission projects while protecting* *ratepayers. The proposed tiered fee structure is informed by a review of comparable frameworks used by North American ISOs and aligns with established cost-recovery best practices*

a) Please provide the review of comparable frameworks or other studies that informed the $100k – 200k transmission procurement submission fee.

b) Does the IESO have a "qualification" criteria/framework for the purpose of identifying candidates who are likely to found unqualified to build or operate a transmission facility in Ontario?

EXHIBIT D - OPERATING EXPENDITURES

D-VECC-7

Reference: Exhibit D-1-1, page 2

"*In addition, employee benefits were $15.7 million higher than budget, primarily driven by higher benefit utilization post-COVID and FTE trends*."

a) Of the $15.7 million identified how much of this is attributable the "higher benefit utilization post-COVID.

b) What are these benefits and what accounts for their higher utilization?

D-VECC-8

Reference: Exhibit D-1-2, page 1, Table 13, OM&A by Business Unit

a) Please modify Table 13, to show for each business unit the labour and non-related OM&A costs

D-VECC-9

Reference: Exhibit D-1-3

a) Please provide a table showing the annual 2023 to 2028 FTES by IESO Business Unit and broken down into the classifications of "Executive, Management, Non-Management Regular and Non-Management Temporary"

D-VECC-10

Reference: Exhibit D-1-3, Attachment 3, page 2

"*As a result, a total of 197 jobs (excluding executives) out of 514 unique job codes at the IESO were compared to jobs in the Mercer Benchmark Database and Mercer Total Compensation Survey*"

a) Please explain what defines a "job code" at the IESO and explain and contrast this with the definition of a ""Grade Band" (as show I Appendix B of the Mercer Study).

b) Please list all the IESO Grade Bands and their salary ranges for each year 2023 through 2026.

c) Please explain how a new position's grade band is determined.

d) Does the IESO do any analysis/study of entering and exiting employees to where it draws its recruits from (e.g. internal, public or private sector) or the reasons for their termination (e.g. retirements, offers of positions in public or private sector companies). If so please provide the most recent study.

e) What percentage of the total FTEs hired in 2025 were drawn from the Ontario Public Service or an agency of the Ontario Government?

EXHIBIT E - CAPITAL EXPENDITURES

E-VECC-11

Reference: Exhibit E-2-1, Attachment 11

a) Please provide the original capital plan for the Future@Work Project and the most recent iteration of that plan which shows key construction milestones to completion. Please provide the original budget and the current budget for entire Future@Work program.

b) Please provide the most recent stage-gate reviews, schedule& progress reports and financial status reports for the Future@Work Project.

c) Does IESO employ Cost Performance Index (CPI) or Schedule Performance index (SPI) for this project? If so, please provide the most recent results.

EXHIBIT F - DEFERRAL AND VARIANCE ACCOUNTS

EXHIBIT G – PREVIOUS OEB DECISIONS

G-VECC-12

Reference: Exhibit G-1-2, Attachment 1, page 7 Table 1 / D-1-2 page 1 Table 13

a) Please explain why the Budget amounts shown for 2023-2025 in Table 1 of the Elenchus -OM&A Work Program Review are different than the Board approved amounts for those years shown in Table 13.

G-VECC-13

Reference: Exhibit G-1-2, Attachment 1, pages 34&35

a) Please update the tables shown at pages 34 and 35 of the Elenchus -OM&A Work Program Review ("IESO OM&A – Work Program Reporting" and "Work Program Relative Size") to include each year 2026 through 2028.

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