

July 29, 2026

VIA Email and RESS

Independent Electricity System Operator

1600-120 Adelaide Street West

Toronto, ON M5H 1T1

t 416.967.7474

www.ieso.ca

Mr. Ritchie Murray
Registrar
Ontario Energy Board
27th Floor 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Mr. Murray:

**Re: Independent Electricity System Operator
2026, 2027, and 2028 Revenue Requirement Submissions Interrogatory
Responses
Ontario Energy Board File No.: EB-2026-0142**

The Independent Electricity System Operator (IESO) is writing to file interrogatory responses (IRRs) in accordance with the Ontario Energy Board's (OEB) Procedural Order No. 1 dated June 19, 2026

The IESO notes that some interrogatories have raised questions/issues which the IESO believes are beyond the scope of this proceeding. The IESO has, in some cases, provided responses in an effort to be of assistance to the parties. The fact that the IESO has provided an answer to these interrogatories should not be taken as an indication that the IESO considers these areas of inquiry to be appropriate for this revenue requirement proceeding.

With its filing, the IESO has included an updated Exhibit List. The IRRs have been organized by issue based on the Final Issues List established in the OEB's Decision on Issues List dated June 19, 2026. Where intervenors did not identify an issue, the IESO has assigned the issue that most closely relates to the interrogatory.

The updated exhibit list and the chart below help to illustrate this. For example, each IRR has specific references in the header such as: **Exhibit H** - representing interrogatories, **Tab** - representing the issue, followed by the file name which includes the party, and interrogatory# (e.g., Exhibit H, Tab 1.1, AMPCO 1, is the reference to the IESO's response to AMPCO Interrogatory 1 under issue 1).

Confidentiality Request

The IESO requests that the response to 1.4-SEC-14 be filed on a confidential basis in accordance with the OEB's *Practice Direction on Confidential Filings* (the "Practice Direction") and the terms specified below. The response provides details of the IESO's bargaining assumptions regarding the next collective agreements with the Power Workers' Union ("PWU") and the Society of United Professionals ("SUP"). Both of these collective agreements are subject to negotiation during the term of the 2026 to 2028 Revenue Requirement Submission (the PWU collective agreement expired in 2025 and the collective agreement with the SUP will expire in 2027). The IESO is currently in active bargaining with the PWU.

Confidential treatment of the response is warranted under factors (a)(iii), (b) and (e) of Appendix A of the Practice Direction. The OEB has repeatedly recognized that information which would reveal an applicant's bargaining strategy in labour negotiations can be filed confidentially due to the risk that it could prejudice the applicant's position in those negotiations. Further, the OEB has recognized the need to provide applicants with the comfort and protection of knowing that no counsel or external consultant that accesses the information will be involved in any way in collective bargaining negotiations for the union during the term that is covered by the application.

In EB-2021-0110, the OEB established specific terms for access to such sensitive information.¹ The IESO requests that the OEB impose the same conditions with respect to access 1.4-SEC-14 as follows:

1. The entirety of the IESO's response to 1.4-SEC-14 shall be treated as confidential.
2. Access to the IESO's response to 1.4-SEC-14 shall be provided to individuals who sign the OEB's Declaration and Undertaking. In respect of parties representing the PWU, SUP and any other unions:
 - i. Only external counsel and external consultants representing the unions in this proceeding shall be permitted to have access to the IESO's response to 1.4-SEC-14.
 - ii. Each external consultant representing a union shall be required to execute and file an affidavit or sworn declaration confirming that the individual is at arms-length from the union and is not and will not be involved in any way in collective

¹ Hydro One Network Inc.'s *Application for electricity transmission and distribution rates and other charges for the period from January 1, 2023 to December 31, 2027*, [Decision on Blue Page Update, Confidentiality Request and Reply on Expert Evidence and Procedural Order No. 2 dated October 25, 2021](#), EB-2021-0110 at pp. 9-10.

bargaining on behalf of the union through to the end of the rate period covered by the Revenue Requirement Submission (up to the end of 2028).

- iii. Each external counsel representing a union shall be required to execute and file an affidavit or sworn declaration confirming that the individual is at arms-length from the union and is not and will not be involved in any way in collective bargaining on behalf of the union through to the end of the rate period covered by the application the Revenue Requirement Submission (up to the end of 2028).

The IESO notes that the same conditions have been proposed, and accepted by OEB staff, for commercially sensitive labour information in Ontario Power Generation Inc.'s current application to set its payment amounts for the 2027 to 2031 period.²

Please contact me directly at 416-969-6090 or Carrie.Aloussis@ieso.ca if you have any questions.

Sincerely,

Carrie Aloussis

Carrie Aloussis
Senior Manager, Regulatory Affairs

cc: Mr. Patrick Duffy, Stikeman Elliott LLP (email)
Intervenors to EB-2026-0142 (email)

² [Ontario Energy Board \(OEB\) Staff Submission on Confidentiality dated July 14, 2026](#), Ontario Power Generation Inc. and DNNP LP 2027-2031 Payment Amounts. EB-2025-0297 at p. 1.