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Auditor's Recommendation	Completed Undertaking	Outstanding Undertaking (including timeline)
AG Recommendation #1 *We recommend the government record valuation allowances to offset the net pension assets it has recorded from the Ontario Teachers' Pension Plan and the Ontario Public Sector Employees' Union Pension Plan until such time as it obtains formal written authorization from their pension plan co-sponsors that they are able to lower minimum contributions or withdraw surpluses from the pension funds within the next 12 months.*	The Office of the Auditor General communicated its interpretation of Public Sector Accounting Standards (PSAS) requiring a full valuation allowance on the Province's two jointly sponsored pension plans in September 2016. At that time, the government passed a time-limited regulation on the accounting treatment for its joint defined benefit plans to align with the Auditor General's interpretation of PSAS, which enabled officials from Treasury Board Secretariat and the Ministry of Finance to sign the Statement of Responsibility for the 2015-16 Public Accounts. During the 2016-17 year, the professional staff conducted further research and analysis, and determined that PSAS does not require a valuation allowance on either of the jointly sponsored pension plans. This conclusion is supported by: • The conclusions reached by an independent Pension Asset Expert Advisory Panel (the 'Panel'), established by the government to provide advice on the interpretation of PSAS with respect to the reporting of net pension assets of these two joint defined benefit plans. The Panel, comprised of accredited accounting, actuarial and legal professionals with extensive background in pension accounting and plan governance, released its report in February 2017 which supported the government's position that a valuation is not required for these two plans under PSAS. Two key findings of the Panel were: 1) there is no requirement under PSAS that any formal agreement exist between the joint sponsors regarding the timing or amount of a reduction in contributions to record an asset, as the existing agreements in place between the parties support the recognition of an expected benefit, and 2) unilateral control is not	The government will evaluate the need for a valuation allowance annually taking into consideration (a) changes, if any, in the governance structures of the plans, (b), decisions, if any, of the joint sponsors that impact the need for a valuation allowance, and b) changes, if any, in Public Sector Accounting Standards. The government is open to continue to discuss the matter in the hopes of resolving this matter.

	required for asset recognition; joint control with each party having the ability to deny the actions of the other sponsor, provides evidence of shared control, supporting recognition of an asset. • An opinion from Deloitte LLP on aspects of the Province's accounting as at March 31, 2016 for the Ontario Teachers' Pension Plan. The opinion, which was dated October 2, 2016, concluded that it was permissible to recognize a pension asset under Canadian Public Sector Accounting Standards, even though the Province did not have under a unilateral right to reduce contributions. The opinion did not address the value at which the asset should be recorded. • Analysis completed by EY as to whether any valuation allowance is required to be recorded for OTPP or OPSEUPP as of March 31, 2017. EY confirmed no valuation allowance was required for either plan. The government respectfully disagrees with the Auditor General's interpretation of the accounting standards on this issue as PSAS neither requires unilateral control to record an asset, nor does it include a requirement to obtain a letter from the co-sponsor of the plan agreeing to reduce future contributions within 12 months.	

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AG Recommendation #2 *We recommend that the government remove the Independent Electricity System Operator's Market Accounts from the Province's consolidated financial statements.*	The Province consolidates the entities it controls, in accordance with Public Sector Accounting Standards (PSAS) and its internal reporting policies. Each consolidated entity produces its own stand-alone financial statements and is subject to its own financial statement audit. In 2016, the Independent Electricity System Operator (IESO) changed the accounting for the market accounts and recognized these balances on its financial statements. The financial statements of the IESO for the year-ended December 31, 2016 were subject to an external audit and received an unqualified (or clean) opinion. The government supports this enhanced reporting and greater transparency for the economic activities of the IESO. Additional comments with respect to IESO's accounting for the Market Accounts are included in the response to Recommendation #5 of this report.	The government supports the enhanced reporting and greater transparency for the economic activities of IESO resulting from the recognition of the market accounts. The government is open to continue to discuss the issue in the hopes of resolving this matter.
AG Recommendation #3 *We recommend the government follow the accounting standards established by the Public Sector Accounting Board and the Province's historical accounting precedent, and implement the recommendations in the Special Report issued*	The government prepares its financial statements in accordance with PSAS. The proposed accounting for the Ontario Fair Hydro Plan reflects the economic substance of the transaction by differentiating costs borne by taxpayers versus those borne by ratepayers. PSAS is silent on the recognition, measurement, presentation and disclosure of rate-regulated activities. In absence of a clear position on an issue, standard accounting practice dictates that an entity should consult other accounting standards. This guidance for PSAS is included in PS1150.07. Regarding the Office of the Auditor General's (OAG's) recommendation that the financing for Ontario's Fair Hydro Plan (OFHP) be pursued at the lowest cost to Ontarians, the government reiterates its concerns with this characterization, which were previously provided in the October 4, 2017 government response to the OAG's special report on OFHP (see	The government intends to continue to prepare its financial statements in accordance with Public Sector Accounting Standards (PSAS). The Fair Hydro Trust will raise financing through a combination of 3rd party senior debt and subordinated debt funded by OPG for which the cost will be primarily driven by the credit ratings assigned by Moody's and DBRS. The ultimate cost of this program will be dependent on the quantity of Global Adjustment that will be financed, prevailing market interest rates over the next 30 years, the availability of capital to invest in this type of structured debt and the

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by our Office and tabled in the legislature on October 17, 2017, titled The Fair Hydro Plan: Concerns About Fiscal Transparency, Accountability and Value for Money, as follows: • *Record the true financial impact of the Fair Hydro Plan's electricity rate reduction on the Province's budgets and consolidated financial statements; and* • *Use a financing structure to fund the rate reduction that is least costly for Ontarians.*	Government Response to OAG Report on the Fair Hydro Plan in Appendix 5 of the Auditor General's Special Report). With respect to the Global Adjustment Refinancing (GA Refinancing) component of the OFHP, the policy objective is to more fairly allocate the cost to ratepayers over the useful life, not the contractual term, of the electricity generating assets. Therefore, it was a primary policy objective to ensure that the costs are borne by the beneficiaries of the electricity system – the ratepayers – and not the tax-base. The government believes it is appropriate for ratepayers to pay for the financing of electricity assets. The rate-base has a different risk profile than the tax-base, which would be reflected in different interest costs. The various entities that operate in the electricity industry have different financing costs that are specific to their risk profiles. The industry does not operate and is not financed through the Province. Ontario Power Generation (OPG) was identified as the Financial Services Manager responsible for the financing plans and the financing entity (i.e., Fair Hydro Trust) that will manage the debt obligations. OPG has the necessary financing and commercial expertise to assist with refinancing the Global Adjustment (GA) and will ensure that it is done in an efficient and cost-effective manner. OPG has a demonstrated track record in the financial markets with its Corporate Debt platform, private placement of insurance linked bonds, participation in securitization program and highly successful project debt issuances tied to new hydroelectric developments. OPG is beginning the process of raising funds to finance the deferred costs, and while total borrowing costs will not be known until the program is complete, accumulated interest is projected to be less than the estimates in the May 2017 report of the Financial Accountability Office (FAO). The figures referenced in the FAO's report was based on initial Ministry of Energy estimates from March 2017. Subsequent analysis	credit stability of the OFHP program which would be reflected in credit ratings assigned to this debt over time. Each of these factors will need to be managed and monitored closely. The government is open to continue to discuss the issue in the hopes of resolving this matter.

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	conducted by the Ministry of Energy refined a number of variables, including the cost of borrowing and the quantity of GA to be refinanced. A number of variables, including interest rates, electricity demand and electricity costs, will change over the thirty-year life of OFHP. Government will continue to revise cost estimates to reflect these variable conditions. In addition, as outlined in the 2017 Long-Term Energy Plan, the government will continue to identify and implement initiatives to take costs out of the electricity system, which would reduce the cost of GA refinancing.	
AG Recommendation #4 *The Office of the Auditor General is the appointed under the Auditor General Act as the auditor for the consolidated financial statements of the Province of Ontario. We recommend that the Treasury Board Secretariat:* • *Proactively supply copies to the Auditor General of all contracts it enters into for accounting advice and opinions in order to ensure that*	Treasury Board Secretariat's use of external expertise for accounting and financial reporting matters supplements its own resources on complex or emerging accounting and reporting matters. External advisors are generally engaged to provide advice and guidance to supplement internal analysis. Treasury Board is committed to working with the Office of the Auditor General to discuss issues, once the professional staff has completed its analysis of the issue. In addition, Treasury Board believes frequent communication with the Office of the Auditor General is important and to that end, requested additional meetings with both the staff and the Auditor General during the 2016-17 audit. Where required by the CPA Ontario Code of Professional Conduct, the Auditor General has been, and will continue to be, advised of external advisor involvement.	Treasury Board Secretariat will continue to take a proactive approach to raising issues with the Office of the Auditor General. Where required by the CPA Ontario Code of Professional Conduct, the Auditor General will continue to be advised of external advisor involvement.

our Office is aware of the work the advisers are performing, can assess significant issues in a timely manner, and can determine the impact on the Province's consolidated financial statements and our annual audit; and • *Build into its contracts with external advisers the requirement that the advisers engaged to provide accounting advice and opinions that affect the consolidated financial statements notify our Office of*		

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their engagement as required under the Code of Professional Conduct of the Chartered Professional Accountants of Ontario.		
AG Recommendation #5 *We recommend that the Independent Electricity System Operator (IESO), an "other government organization," use the Canadian Public Sector Accounting Standards (PSAS) in the preparation of its financial statements. Specifically, it should:*	The Independent Electricity System Operator (IESO) prepares its financial statements in accordance with Public Sector Accounting Standards (PSAS) and the financial statements are audited by a firm of independent external auditors whose responsibility is to express an opinion on whether the financial statements are fairly presented in accordance with PSAS. On its 2016 financial statements, IESO received an unqualified (clean) audit opinion. In its role as market administrator, IESO operates and settles approximately $17 billion through the electricity market. The change to include market account assets and liabilities in the financial statements provides increased transparency with respect to the value of transactions that flow through Ontario's electricity market, that otherwise would go	The IESO intends to continue to prepare its financial statements in accordance with Public Sector Accounting Standards, and will report on the results of its accounting firm's audit in its 2017 financial statements, to be published March 30, 2018. The IESO will continue to regularly review its accounting policies to ensure they are best suited to the reporting requirements of its business and the users of its financial statements. This includes providing transparency into the value of transactions that flow through Ontario's $17 billion electricity market and reflecting the economic substance of certain types of expenses that may not be directly recovered through normal revenue requirement

• *Remove market accounts recorded on its financial statements; and* • *Discontinue the inappropriate use of rate-regulated accounting in the preparation of its financial statements.* *To ensure that the members of the Legislative Assembly receive financial information on the operations of the IESO prepared in accordance with Canadian PSAS, the Office of the Auditor General will conduct an attest audit of the December 31, 2017, financial statements of the IESO as permitted under the Electricity Act, Subsection 25.2(2), which*	unreported in IESO's financial statements. These changes were extensively discussed with IESO's external auditors, its Audit Committee and its Board of Directors. The decision was supported by the Office of the Provincial Controller and IESO's external audit firm. Rate-regulated accounting better reflects the economic substance of certain types of IESO expenses (like those related to the Smart Metering Entity) that may not be directly recovered through normal revenue requirement models, and instead are recovered through rate regulation. This change is in line with accounting practices followed by six out of eight other independent system operators in North America and provides IESO financial statement users greater transparency into the substance of the variance accounts it holds and its right to collect an amount in the future.	models, and instead are recovered through rate regulation. The IESO recognizes the Auditor General's statutory role and authority to perform an audit of the IESO. The IESO is cooperating with the Office of the Auditor General to provide information, including the 2017 financial statements prepared by management, and for access to management for assistance in understanding such information. The IESO has likewise instructed its audit partner to cooperate with the Auditor General's audit.

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states: "The Auditor General may audit the accounts and transactions of the IESO. 2014, c. 7, Sched. 7, s. 3 (1)."		
AG Recommendation #6 *We recommend the government follow the accounting standards established by the Public Sector Accounting Board, rather than using legislation and regulations to prescribe accounting treatments.*	The Province is committed to provide high-quality financial reports that support transparency and accountability in reporting to the public, the legislature and other users. For the 2015-16 Public Accounts, the government passed a time-limited regulation prescribing the accounting treatment for net pension assets in order to allow Treasury Board Secretariat and Ministry of Finance officials to sign off on Public Accounts consistent with the fiscal impact of the Auditor General's interpretation of Public Sector Accounting Standards (PSAS). This regulation is the only example of where the accounting treatment was legislated, and the legislation did not align with the requirements of PSAS. With respect to the Ontario Fair Hydro Plan Act and its regulations, there are no provisions in that legislation that prescribe the accounting treatment required to be followed by the Province. It is important to distinguish legislating the accounting from legislating the right of the government to recover amounts from specified ratepayers in the future,	The government intends to continue to prepare its financial statements in accordance with Public Sector Accounting Standards.

	which in the absence of the legislation, would have been collected from specified ratepayers as the costs were incurred. The accounting for the transactions resulting from the Fair Hydro Plan will be recorded in accordance with PSAS.	
AG Recommendation #7 *We recommend that in order to address the Province's growing total debt burden, the government work towards the development of a long-term total-debt reduction plan linked to its target of reducing the net debt-to-GDP ratio to its pre-recession level of 27% as measured using proper accounting for net pension assets and the projected costs of the Fair Hydro Plan. The government should also discuss publicly how it plans to pay down the debt.*	The 2017 Budget and the 2017 Fall Economic Statement stated that the government continues to maintain a target of reducing the net debt-to-GDP ratio to its pre-recession level of 27%, currently projected for 2029-30, together with an interim target of 35% by 2023-24. From 2017-18 onwards, the balanced budget environment will limit increases in debt to the difference between annual investments in infrastructure improvements and the amortization of such investments. The government's long-term infrastructure plan to invest about $190 billion over 13 years, starting in 2014-15, will contribute to the growth of the economy. The Centre for Spatial Economics found that for every $1 spent on public infrastructure, GDP increases by $6, on average, in the long term. Therefore, while overall debt will rise to fund these infrastructure investments, measurements of relative debt such as the net debt-to-GDP ratio, a recommended practice by the Public Sector Accounting Board, will gradually diminish due to the Province's GDP increasing at a faster rate than net debt. This will allow the Government to continue to move towards its 27% net debt-to-GDP target. The ratio has already commenced declining, falling to 37.3% in 2017-18 from its 2014-15 peak of 39.3%.	Continue to monitor progress. Estimated implementation by FY 2029-30.

	As discussed more thoroughly in responses to other recommendations in this report, the government prepares its financial statements in accordance with Public Sector Accounting Standards, including the net pension assets for its jointly sponsored pension plans and the transactions resulting from the Ontario Fair Hydro Plan.	
AG Recommendation #8 *We recommend that the Office of the Provincial Controller undertake thorough planning involving all stakeholders, including Treasury Board Secretariat, ministries and provincial government agencies, to identify the barriers and key areas to be addressed to achieve earlier finalization of the Province's consolidated financial statements, including the estimation risks associated with corporations tax and*	Treasury Board Secretariat and the Ministry of Finance are supportive of the timely delivery of the Public Accounts. The Office of the Provincial Controller works closely with the Office of the Auditor General to identify audit issues early and to ensure that stakeholders are engaged in discussions regarding risks and resolution. The Office of the Provincial Controller will continue to collaborate with the Office of the Auditor General to support the timely delivery of the Public Accounts. The Province will work with the Canada Revenue Agency on this recommendation, as reporting Personal and Corporate taxation revenues is highly dependent on information they provide.	Planning discussions for the 2017-18 Public Accounts have begun between the Office of the Provincial Controller and the Office of the Auditor General. As well, the Office of Economic Policy has been engaged in discussions on risk considerations related to economic models used to estimate personal and corporate tax revenues.

personal income tax revenues.		
AG Recommendation #9 *We recommend that the government avoid establishing arm's length trusts in order to record an expense in its consolidated financial statements before it is necessary, given that it loses the ability to ensure that funds are ultimately provided to the appropriate beneficiaries.*	The government works with its transfer payment recipients to ensure it receives good value for the money it provides in the form of grants. Government policy on the structured approach to program delivery takes a risk-based approach with respect to transfer payment oversight. Grants are provided to thousands of organizations annually that the government deals with at arms-length and is able to demonstrate proper oversight. A Trust structure was selected to implement the Affordability Fund in order to provide an effective solution to distributing funds to electricity distributors. With approximately 70 distributors across Ontario, it was not feasible for the Province to enter into agreements with each distributor. The Trust structure establishes an independent entity with expertise from the electricity distributor and community sectors. While the Affordability Fund was established at arm's length to the government, there are report-back requirements on the use of funds transferred as well as the ability for the government to conduct an audit to gain assurance that the funds have been used for the purposes intended.	The government will continue to assess the most appropriate vehicle for meeting its policy objectives, which include appropriate oversight of how transfer payments are spent.

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AG Recommendation #10 *We recommend that the government determine when it will issue a regulation as outlined under subsection 11(1) of the Fiscal Transparency and Accountability Act, 2004 confirming the source of reference for the Pre-Election Report and the timeline for issuance of the report that will be subject to our review under the Act.*	Under the *Fiscal Transparency and Accountability Act*, 2004, the government may file a regulation that would require it to release a Pre-Election Report on Ontario's Finances. Should the government file such a regulation, the Auditor General would be required to issue a Statement based on a prompt review following the release of such a Pre-Election Report.	The government remains committed to meeting the legislative requirements of the Act and working constructively with the Office of the Auditor General.