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[], 2017

The Honourable Glenn Thibeault
Minister of Energy
900 Bay Street
4th Floor, Hearst Block
Toronto, Ontario M7A 2E1

Dear Minister Thibeault,

Re: Billing requirements under Ontario Regulation 196/17

Further to section 3 of Ontario Regulation 196/17 (the "Regulation"), the IESO hereby advises the Ministry that, for technical or operational reasons, it would be impractical or unreasonably complicated/difficult for the IESO to meet certain invoice wording and invoicing process requirements set out in the Regulation.

Commented [BJ1]: Is this the wording in the regulation - we need to identify why is is "impractical or unreasonable difficult". If so leave the wording.

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More specifically, with respect to the requirement under clause 1 of the Regulation, the IESO's current invoicing processes only permit charge types to be print in numerical order and therefore the Ontario Fair Hydro Plan line item would not appear in the location required by that clause. ~~Instead, the line item would appear towards the bottom of the invoice and before the Ontario Clean Energy Benefit and the IESO Administration Charge.~~ [NTD: is the bolded text correct for O. Reg. 196/17?] In addition, the IESO's current invoicing processes could only print the wording required by that clause on all invoices for all market participants and not just on those invoices issued to specified consumer accounts.

Commented [BJ2]: Why do we need to include this because the Clean Energy Benefit is CT 1465 and OFHP Debit are 1142 and 1143. So it would be in between - let's just avoid talking about placement.

Commented [BJ3]: Would there be benefit to say "(Consumers, Generator, Importer, Exporters and Program Participant?)"

Commented [BJ4]: Are these the "right" words. Could we say unreasonably costly - not sure it is really "difficult".

Commented [BJ5]: Yes this means about 10 weeks of building, implementing and testing - leave in this estimate

It would be impractical or unreasonably difficult/expensive to change the IESO's current systems to accommodate these Regulation requirements as it would cost about \$40,000 and require close to 400 person-hours and there is currently only two specified consumers who are IESO customers. As such, the IESO offers, for the Minister's consideration, the following alternative invoicing processes and/or invoice wording which the IESO believes would also promote the purposes of those Regulation requirements without the IESO incurring additional costs:

- Invoices would be issued with no additional wording, but an email would be sent to specified consumers who are IESO customers at the same time as the invoice is issued containing the language, *"You have received your monthly IESO invoice inclusive of Ontario Fair Hydro Plan. Ontario's Fair Hydro Plan substantially lowers electricity bills for typical residential consumers. This includes the eight per cent rebate introduced in January 2017, and builds on previous initiatives to deliver broad-based relief on all electricity bills."* [NTD: this contemplates an email being sent

Commented [BJ6]: They will simply schedule an email monthly to the two affected participants.

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~~each time an invoice is issued. Do you want to propose it be sent less frequently?}~~

~~{OR}~~

- ~~• Invoices issued to all IESO customers will contain the statement: "The Ontario government's Fair Hydro Plan substantially lowers electricity bills for typical residential consumers. This includes the eight per cent rebate introduced in January 2017, and builds on previous initiatives to deliver broad based relief on all electricity bills". INTD: which of the above two options would you want to propose?}~~

If the Minister is satisfied that using the different processes and invoice wording in an email as described in the bulleted list above would also promote the purposes of the cited Regulation requirements, we ask that the Minister consider issuing a written notice to the IESO so stating in order that the IESO may follow the invoicing processes and wording specified above instead of the corresponding invoicing processes and wording otherwise required under the Regulation.

Yours truly,

Kim Marshall
Vice-President, Corporate Services and CFO, IESO