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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 difficult for the IESO to meet certain invoice wording and invoicing process requirements set out in the Regulation. The IESO hereby requests to use a different invoicing that will still promote the purposes of the requirement.

More specifically, with respect to the requirement under clause 1 of the Regulation, [the IESO’s current invoicing processes only permit charge types to 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?]

Further, there are only two specified consumers that are IESO customers. In addition, the IESO’s current invoicing tools and processes could only print the wording required by that clause section 3 on all invoices for all IESO market participants and not just on those invoices issued to specified consumer accounts.

It would be impractical or unreasonably difficult to change the IESO’s current systems to accommodate those the Regulation requirements as it would cost about \$40,000 and require close to 400 person-hours to serve and there is currently only two specified consumers who are IESO customers. [NTD: is highlighted text correct?] As such, pursuant to Section 3, the IESO offers, for the Minister’s consideration, the following alternative invoicing process and/or invoice wording which the IESO believes would also promote the purposes of those the Regulation requirements without the IESO incurring additional unnecessary costs:

- ◆ Invoices would be issued with no additional wording, but an email would be sent from the IESO to specified consumers who are IESO customers at the same time as the invoice is issued containing the language “Ontario’s Fair Hydro Plan substantially lowers electricity bills for typical residential consumers. This includes the eight per cent

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~~rebate introduced in January 2017, and builds on previous initiatives to deliver broad-based relief on all electricity bills.” Email to specified customers would continue through the 12-month period ending according to section 2. [NTD: this contemplates an email being sent 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”. [NTD: which of the above two options would you want to propose?]~~

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If the Minister is satisfied that using these different processes and invoice wording 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