

Message

From: Anderson, Rhonda E [rhondaanderson@kpmg.ca]
Sent: 2017-03-24 4:44:30 PM
To: Susan Nicholson [/O=IMO/OU=MSX1/cn=Recipients/cn=Susan Nicholson]
Subject: Re: taxes for the new rate mitigation asset

Tuesday works!

Rhonda sent this message from her iPhone.

> On Mar 24, 2017, at 5:44 PM, Susan Nicholson <susan.nicholson@ieso.ca> wrote:
>
> Unfortunately I can't do that time on Monday. Perhaps Tuesday between 11 and 2. Enjoy your weekend.
>
> Susan
>
> See attached two emails for background on questions.
>
>
> -----Original Message-----
> From: Anderson, Rhonda E [mailto:rhondaanderson@kpmg.ca]
> Sent: March 24, 2017 4:37 PM
> To: Susan Nicholson
> Subject: Re: taxes for the new rate mitigation asset
>
> *** EXTERNAL email. Please be cautious and evaluate before you click on links, open attachments, or
provide credentials. ***
>
>
> Hello Susan, great to hear from you. I have time between 1 and 2:45PM. Can u give me the heads up as
to the questions so the time will be worthwhile and if there is anything you can send or have sent that
would be great too.
>
> Look forward to chatting.
>
> Have a great weekend Susan! I am in Halifax this weekend - I have been here for business for a few
days and will visit Mom😊
>
> Rhonda sent this message from her iPhone.
>
>
> On Mar 24, 2017, at 5:31 PM, Susan Nicholson <susan.nicholson@ieso.ca<mailto:susan.nicholson@ieso.ca>>
wrote:
>
> Hi Rhonda – please let me know if you have some time on Monday morning to speak. I now have two HST
questions for you to look into for the IESO.
>
> Thanks, Susan
>
> From: Anthony Martinello
> Sent: March 24, 2017 12:34 PM
> To: Susan Nicholson
> Cc: Michael Boll; Jeannette Briggs
> Subject: taxes for the new rate mitigation asset
>
> Susan,
>
> The good topic of taxes came up (income taxes, excise HST) brought up by Michael.
>
> The purported plan is that the IESO is selling a regulatory asset to a trust (separate legal entity or
entities), and the IESO will be paid a purchase price for those assets. At a point in the future, the
IESO will repay for those assets (akin to a repurchase or repo agreement that banks use today with great
frequency).
>
> Will the IESO be subject to any income or excise taxes/HST? Maybe KPMG who is already on this file may
have some headway into this topic and you could ask Michel or Rhonda?
>
> This matter will be place on our list of issues.
>
> Regards.
>

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