

October 14, 2015

Ryan King
IESO Stakeholder Engagement
Independent Electricity System Operator
120 Adelaide Street West, Suite 1600
Toronto ON M5H 1T1



Re: IESO Foundation Project Recommendations

Dear Mr. King:

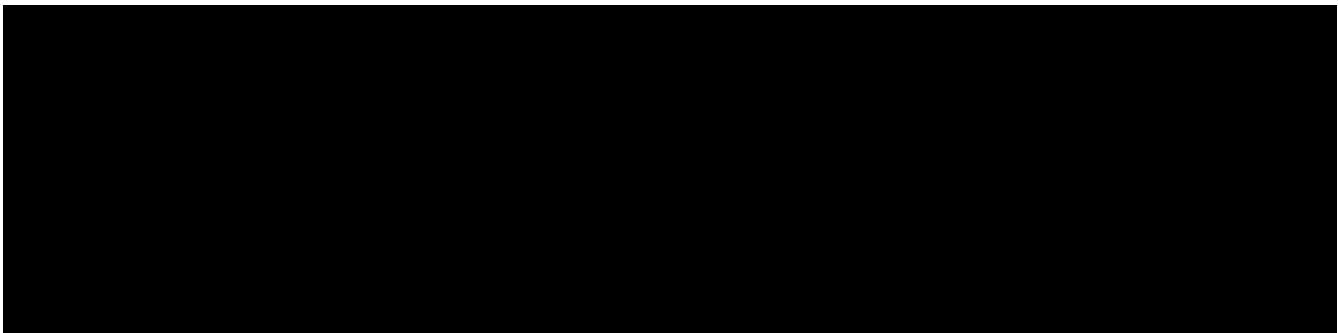
London Hydro appreciates the opportunity to provide comments on the proposed recommendations that have been developed through consultation with the Foundation Working Group. As a member of the Electricity Distributors Association, London Hydro endorses the points made in the EDA response to the IESO and offers the following comments as additional consideration with respect to the Foundation and MDAP projects.

London Hydro's primary objective is to serve the interests of our customers and in that light would like to submit the following comments:

1. London Hydro is concerned that electricity rate payers will become the default source of funding for these initiatives, while there has been no established direct value for our customers.
2. The proposed recommendations being made by the IESO in various places refer to being the recommendations of the Foundation Working Group. London Hydro cannot endorse these recommendations as being that of the Foundation Working Group since the original Terms of Reference for the Working Group established that there would be no voting or requirement to achieve consensus. We therefore view these recommendations as being recommendations of the IESO/SME and respectfully request them to be identified as such.
3. The Green Button initiative is a standards based approach to providing access to energy data that has existing support within Ontario and addresses customer privacy concerns. London Hydro believes that Green Button can satisfy a substantial proportion of data access objectives and as an openly developed standard, Ontario interests can be represented in future extensions to the existing standard. It is our

view that a replication of capabilities does not best serve our customers' interest and greater commitment should be given to supporting the Green Button initiative over the development of the Foundation and MDAP projects.

4. The separation of the Foundation Working Group and MDAP Working Group has created confusion in the industry. The IESO Foundation project is clearly a stepping stone toward an MDAP solution and therefore all material needs to be considered in the broader context. It is our belief that the output from the Foundation Working Group cannot be fully comprehended without insight into the objectives of MDAP.



We thank you for the opportunity to provide feedback on the IESO's recommendations that have emerged from the consultations with the Foundation Working Group and welcome the opportunity for further discussion.

Sincerely,

Stuart Smith
Director, Solution Architecture
London Hydro Inc.