

November 8, 2021

Delivered by Email & RESS

Ms. Christine Long, Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2021-0015 – Elexicon Energy Inc. (“Elexicon”) IRM and ICM
Application (the “Application”)
Responses to Interrogatories**

Pursuant to Procedural Order No. 2 dated October 19, 2021, please find enclosed Elexicon’s Responses to the Interrogatories (“IRs”) of Ontario Energy Board (“OEB”) Staff received on October 25, 2021, Mississaugas of Scugog Island First Nation, Power Workers’ Union, and School Energy Coalition received on October 26, 2021, Consumers Council of Canada received on October 27, 2021, and Vulnerable Energy Consumers Coalition received on October 28, 2021.

The IRs will be filed through the OEB’s web portal (“RESS”) and include updates to the following files:

- Elexicon’s Veridian Rate Zone (“VRZ”) IRM Rate Generator Model and Tariff of Rates and Charges
- VRZ GA Analysis Workform
- VRZ Accounting Guidance 2020 Analysis
- VRZ ICM Model
- VRZ IRM Rate Generator Model and Tariff of Rates and Charges excluding the ICM related components (in response to OEB Staff-13)

An overview of the updates and related filenames are included in the response to OEB Staff-25.



Also filed separately through the RESS are two redacted documents for SEC-1 regarding Board Materials and the Seaton TS Business Case.

Amendment to Relief Sought in Application

In the Decision and Order in the MAADs Application between Veridian Connections Inc. and Whitby Hydro Electric Corporation (EB-2019-0236) (“Elexicon MAADs Decision”) the OEB ordered that Elexicon file its Earnings Sharing Mechanism (“ESM”) proposal by December 31, 2021, in accordance with prevailing OEB policy at that time. The OEB noted that this requirement was consistent with that made in the Decision and Order in the Alectra Utilities Corporation’s (“Alectra”) amalgamation proceeding.

In compliance with the Elexicon MAADs Decision, Elexicon filed its ESM proposal together with the Application on August 18, 2021.

In its 2020 Incentive Regulation Mechanism Application (the “Alectra Application”) (EB-2019-0018), Alectra filed its ESM proposal and sought an order from the OEB approving its ESM proposal for the 2022-2026 period.

Therefore, consistent with the Alectra Application, Elexicon is requesting to amend the relief sought in the Application by adding a request for an order approving Elexicon’s Earning Sharing Mechanism proposal for the 2024-2028 period.

Elexicon submits that this amendment does not impact the proceeding in any material respect as the ESM proposal was filed with the Application.

In the Application filed on August 18, 2021, Elexicon included a request for the establishment of rate riders associated with the disposition of VRZ’s Group 1 accounts. Elexicon requests that these rate riders be established on an interim basis.

Request for Confidential Treatment

Elexicon is hereby requesting confidential treatment, pursuant to Sections 10.01 and 10.02 of OEB’s *Rules of Practice and Procedure* (Revised July 30, 2021) and Sections 5.1.1 and 5.1.2 of the OEB’s *Practice Direction on Confidential Filings* (Revised February 17, 2021) (“Practice Direction”) for information provided in response to SEC-1.



1. SEC-1

In response to SEC-1, Elexicon has filed materials submitted to Elexicon's Board of Directors regarding the proposed ICM projects (the "Board Materials").

To the extent the Board Materials include materials that are not related to the ICM projects, such irrelevant information has been redacted.

The Board Materials also included information related to the bidders to the General Contractor tender, including the successful and unsuccessful bidders (the "Bidders"). The information contains details that compares the Bidders' bids, the bid amounts, and Elexicon's considerations. Each of the Bidders are engaged in a competitive business of providing General Contractor services. The names of the Bidders and the amounts (in particular where the bid amount can be tied to an individual successful or unsuccessful Bidder) have been redacted as this information, if disclosed, would affect the competitive position of these Bidders. Bidders typically keep their historical bidding information to themselves, so they can use this information to inform future bids. Public disclosure of this information would cause these Bidders undue harm.

In addition, Elexicon relies on Bidders willingness to participate in its tendering processes from time to time to facilitate competitive pricing for the work it procures. If Bidders become concerned that the prices they submit in confidence into Elexicon's tendering processes may be disclosed on the public record, those Bidders may elect not to participate in future tenders – reducing competitive tensions and possibly resulting in higher prices for future services and deliverables, which would be a harm to Elexicon and to ratepayers. The redactions relate primarily to discrete information that was reported to the Board, which if disclosed, would have the effect disclosing key confidential details related to the competitive tendering process.

OEB's Considerations for Confidentiality Requests

Appendix "A" to the Practice Direction sets out the OEB's considerations in determining requests for confidentiality. Among those considerations are the following:

- (a)(i) prejudice to any person's competitive position;*
- (a)(iv) whether the disclosure would be likely to produce a significant loss or gain to any person; and*
- (g) any other matters relating to FIPPA (the Freedom of Information and Protection of Privacy Act) and FIPPA exemptions.*



With respect to item (g) above, the OEB has provided a summary of pertinent FIPPA provisions at Appendix C of the Practice Direction. That summary provides, in part, as follows:

“Under section 17(1), the OEB must not, without the consent of the person to whom the information relates, disclose a record where:

- (a) the record reveals a trade secret or scientific, technical, commercial, financial or labour relations information;*
 - (b) the record was supplied in confidence implicitly or explicitly; and*
 - (c) disclosure of the record could reasonably be expected to have any of the following effects:*
 - i. prejudice significantly the competitive position or interfere significantly with the contractual or other negotiations of a person, group of persons or organization;*
 - iii. result in undue loss or gain to any person, group, committee or financial institution or agency;*
- ...”*

The Practice Direction recognizes that these are among the factors that the OEB will take into consideration when addressing the confidentiality of filings. They are also addressed in section 17(1) of FIPPA, and the Practice Direction notes (at Appendix C of the Practice Direction) that third party information as described in subsection 17(1) of FIPPA is among the types of information previously assessed or maintained by the OEB as confidential.

In addition, in the OEB’s recent letter issued related to its *Proposed Amendments to the Practice Direction on Confidential Filings (EB-2021-0227)* (“Proposed Amendments”) dated August 9, 2021, at Appendix B, the OEB proposed specific categories of information that would be deemed to be “presumptively confidential” as part of its proposed amendments. The list in Appendix B includes “Copy of an unsuccessful bid received as part of a competitive procurement process.” The redactions made to the Bidders’ information is consistent with the OEB’s Proposed Amendments.

Ellexicon submits that disclosing the information that has been redacted would put the Bidders in a competitive disadvantage vis-à-vis their competitors in the market. It would be revealing commercial information that, if disclosed, would reasonably be expected to result in undue loss on the Bidders’ part in its business. Ellexicon requests confidential treatment of the information redacted with respect to the Bidders’ information as described above.



2. SEC-2

In response to SEC-2, Elexicon filed a copy of the Seaton Transformer Business Case dated August 17, 2016 ("Business Case").

Borden Ladner Gervais LLP ("BLG") was retained by Veridian Connections Inc. (Elexicon's predecessor) to provide legal and regulatory review of the Costello Associates Supply Options Study. Attached to the Business Case is a memorandum from BLG containing such legal advice and a summary of BLG's legal advice was also included at Section 6.0 of the Business Case.

This information constitutes solicitor client privileged legal advice that is exempt from disclosure and has thus been permanently redacted from the Business Case. The disclosure of these documents would constitute violation of solicitor client privilege.

Filing of Confidential Documents

Elexicon is prepared to provide unredacted copies of the Board Materials (relevant portion) to parties' counsel and experts or consultants provided that they have executed the OEB's form of Declaration and Undertaking with respect to confidentiality and that they comply with the Practice Direction, subject to Elexicon's right to object to the OEB's acceptance of a Declaration and Undertaking from any person.

In keeping with the requirements of the Practice Direction, Elexicon is filing a confidential unredacted version of the documents with the Registrar. The unredacted versions of the documents have been marked "Confidential" and Elexicon has identified the portions of the document in respect of which confidentiality is claimed through the use of sidebars ("|"). Elexicon requests that the unredacted documents be kept confidential.

Sincerely,

Steve Zebrowski
Manager, Regulatory Policy
Elexicon Energy Inc.



cc: Ms. Birgit Armstrong (OEB)
Mississaugas of Scugog Island First Nation
Power Workers' Union
School Energy Coalition
Consumers Council of Canada
Vulnerable Energy Consumers Coalition



Elexicon Energy Inc.

2022

IRM Rate Application

Interrogatory Response-OEB Staff

EB-2021-0015

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OEB STAFF – 1

Reference: Appendix B, pages 11-13

Question:

For the project alternatives, Elexicon considered building Seaton TS at site 2 (preferred option 1) and at site 3 (option 10).

a) Why was site 1 not considered for a standalone option that involves only the construction of Seaton TS?

Response:

For background in responding to this OEB staff question, Elexicon Energy Inc.'s ("Elexicon") predecessor, Veridian Connections Inc. ("Veridian"), developed the Seaton Transformer Station Supply Options Study (the "Option Study") contained within the initial business case, as filed in response to Staff-8, to determine how it would meet the new load forecasted for the Seaton area. In consultation with Hydro One Networks Inc. ("HONI"), the Option Study assumed that all of the new load would be supplied by a new standalone transformer station constructed by HONI or Veridian. It concluded that the best alternative was for Veridian to build its own Seaton TS at Site 2.

Near the time that Veridian was completing this study, the Independent Electricity System Operator ("IESO") was also conducting a regional supply study in 2016 for the Pickering-Ajax-Whitby Sub-region. The IESO considered the forecasted load growth in the Seaton area, and considered a number of alternatives in order to supply this new load (filed as Appendix B: Seaton Station Analysis on page 656 of the Distribution System Plan (the "DSP")).



Two existing HONI-owned stations had some remaining capacity that potentially could have been used to delay the construction of the Seaton TS. Ultimately, the IESO concluded that the cost to connect the Seaton loads to these existing stations and then constructing Seaton TS was higher than constructing a stand-alone TS. It was determined that the construction of the stand-alone Seaton TS at Site 1 or 2 was the preferred alternative. The alternatives studied by the IESO are listed in Table 5, of Appendix B of the Pickering Ajax Whitby IRRP, page 673 of DSP.

The table shown on pages 11-13 in Appendix B of Elexicon's 2022 Electricity Distribution Rate Application (the "Application"), is a combined summary of the major alternatives that were considered in the Option Study and the IESO Integrated Regional Resource Plan ("IRRP").

Site 1 was considered as a stand-alone alternative (see Appendix B of the 2016 Pickering Ajax Whitby IRRP report attached as part of Appendix C: Regional Planning Documents of the DSP, item B.7 Economic Comparison of Alternatives, Table 4 on page 15) but was estimated to cost over \$5MM more than Site 2. Due to this cost difference, it was not listed as a reasonable alternative in Appendix B, Pages 11-13 of the Application.

b) Please discuss the pros/cons of site 1 compared to sites 2 and 3.

Response:

HONI and Veridian co-authored the Class Environmental Assessment – Environmental Study Report ("ESR") filed with the Ministry of the Environment, Conservation and Parks in August 2018. This Class EA process requires that the TS site be selected on the basis of the best combination of environmental, technical, and economic impacts. Site 2 was deemed to be the preferred site. Please refer to the attached excerpt from the ESR comparing the alternative sites.



c) What is the forecasted cost if Seaton TS is constructed at site 1?

Response:

Per Appendix B of the 2016 Pickering Ajax Whitby IRRP report attached as part of Appendix C: Regional Planning Documents of the DSP, item B.7 Economic Comparison of Alternatives, Table 4 on page 15, Site 1 was estimated to cost \$42.96MM.

Table 5-2: Details of Site Evaluation by Criteria Group

Components	Scoring System*	Alternative Sites						Comments	Weight (%)
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)			
	Max Score = 5 Min Score = 0	Measure	Score	Measure	Score*	Measure	Score*		
Agricultural Resources (Criteria Group Weight = 5%)									5
Class 1, 2, and 3 agricultural lands affected by MTS and transmission line upgrades	Yes = 0, No = 5	Yes	0	Yes	0	Yes	0	All three alternative sites would affect Class 1, 2, or 3 agricultural lands.	
Potential to affect actively farmed lands by MTS and transmission line upgrades	High = 1, Moderate = 3, Low = 5	High	1	Moderate	3	Low	5	The longer the transmission line that needs to be upgraded, the greater the effect on active farm field.	
Study areas for the Project within Duffins Rouge Agricultural Preserve	Inside = 0, Outside = 5	Outside	5	Outside	5	Inside	0	The proposed line tap that would need to be constructed for Site #3 is within the Agricultural Preserve area.	
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			2.0		2.7		1.7		
Forest Resources (Criteria Group Weight = 5%)									5
Area of forest to be removed (hectares (ha))	Large Area =1, Mid-Sized Area= 3, Small Area= 5	Mid-Sized (Approx. 5.1 ha)	3	Small (Approx. 1.4 ha)	5	Large (Approx. 10.5 ha)	1	Site #3 is covered by contiguous white cedar conifer forest, and would require extensive clearing. Site #1 has a few patches of poplar deciduous woodland and some Scots pine trees. Site #2 has very limited willow tree cover at the north edge of site that will likely not be affected by construction. The line tap to Site #3 will have the largest area of effect to forestry resources. The line tap connection to Site #1 would require removal of a small amount of Scots pine plantation. The tap line connection to Site #2 would require removal of a small amount of hedgerow. No additional tree removal will be required for transmission line upgrades since the existing, maintained transmission corridor will be used.	
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			3.0		5.0		1.0		
Cultural Heritage Resources (Criteria Group Weight = 10%)									10
Potential interactions with built heritage features	Yes = 0, No = 5	Yes	0	No	5	No	5	There is an existing building with heritage value on Site #1.	
Archaeological potential following Stage I Assessment		Yes	0	Yes	0	Yes	0	The Stage I archaeological assessment determined there is archaeological potential at all three sites.	

Components	Scoring System*	Alternative Sites						Comments	Weight (%)	
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)				
		Measure	Score*	Measure	Score*	Measure	Score*			
Agricultural Resources (Criteria Group Weight = 5%)										5
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			0		5.0		5.0			
Component	Scoring System*	Alternative Sites						Comments	Weight (%)	
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)				
		Measure	Score*	Measure	Score*	Measure	Score*			
Human Settlements (Criteria Group Weight = 15%)										15
Potential effects to existing residences or businesses within 300 m of MTS	High = 1, Moderate = 3, Low = 5	Moderate	3	Low	5	High	1	Residential neighborhoods are present south of Site #3. Various residential streets surround Site #1. Very few homes exist near Site #2.		
Nearest Potential Noise Receptors (PORS) to MTS	Multiple receptors nearby=1, Single receptor nearby=3, Receptors far away = 5	Single Dwelling Nearby	3	Single Dwelling Nearby	3	Multiple Receptors Far Away	5	Site #1 and Site #2 each have a single receptor (i.e. residential building) close by. At Site #3 is ~400m from the nearest receptor.		
Conformance with Provincial Policy Statement (PPS), and City of Pickering Master Environmental Servicing Plan (MESP)	Yes = 5, No = 0	Yes	5	Yes	5	Yes	5	The transmission facilities that would be required for each of these three sites would use an existing right-of-way which is consistent with the planning recommendation of the PPS. The MESP was considered and utilized as much as possible during the planning process. The MESP provided a starting point for locating feasible alternative MTS sites.		
Easement required for the MTS and transmission line upgrade (e.g., potential effects on the existing property ownership)	Yes = 0, No = 5	No	5	Yes	0	Yes	0	Sites #2 and #3 would require easements for the line tap connection. Site #1 would directly connect to the adjacent transmission corridor, with no easement required.		
Number of road or railway crossings by transmission line and transmission tap (e.g., potential traffic disruption during construction)	Multiple Crossings = 1, Single Crossing = 3.	Two Crossings	1	One Crossing	3	Two Crossings	1	The portion of the transmission line to be upgraded to connect to Site #1 has two crossings (Brock Rd and Taunton Rd). The transmission tap for Site #2 must cross Taunton Rd once. The transmission line for Site #3 would cross Dixie Road, and the line tap will also be extended across the rail corridor.		

Components	Scoring System*	Alternative Sites						Comments	Weight (%)
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)			
		Measure	Score*	Measure	Score*	Measure	Score*		
*Max Score = 5 Min Score = 0									
Agricultural Resources (Criteria Group Weight = 5%)									5
	No Crossings = 5								
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			10.2		9.6		7.2		
First Nations or Métis Communities (Criteria Group Weight = 5%)									5
Presence of First Nations community identified cultural, traditional, or historic resources	Yes= 0, No= 5	No	5	No	5	No	5	No known First Nations community identified cultural, traditional, or historic resources are present. Archaeological potential is addressed under the "Cultural Heritage Resources" category.	
Changes in access to cultural, traditional, or historic resources		No	5	No	5	No	5	No expected changes in access to cultural, traditional, or historic resources.	
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			5.0		5.0		5.0		
Component	Scoring System*	Alternative Sites						Comments	Weight (%)
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)			
	Max Score =5 Min Score=0	Measure	Score	Measure	Score*	Measure	Score*		
Mineral Resources (Criteria Group Weight = 0%) N/A									0
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			N/A		N/A		N/A		
Natural Environment Resources (Criteria Group Weight = 30%)									30
Potential impact to wetlands within 120m of MTS and transmission line upgrades	High = 1, Moderate = 3, Low = 5	High	1	Moderate	3	Low	5	Site #1 and Site #2 have on-site wetlands. The Site #2 wetland is located in the north part of the proposed site, and will be avoided to the extent feasible. Construction within wetlands on Site #1 would be unavoidable. There is a small wetland within 15 m of Site #3, but no on-site wetlands.	
Number of transmission line upgrade water crossings	Multiple Crossings = 1, Single Crossing = 3, No Crossings = 5	Three Crossings	1	One Crossing	3	One Crossing	3	The portion of the transmission line to be upgraded to reach Site #1 will cross both Urfe Creek and Ganatsekiagon Creek, as well as a small pond east of Brock Road. The line upgrade to Site #2 will cross a small wetland. A watercourse from Cherrywood TS that follows the transmission RoW to the southern edge of Site #3 would be crossed by the line tap connection.	

Components	Scoring System*	Alternative Sites						Comments	Weight (%)
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)			
	Max Score = 5 Min Score = 0	Measure	Score	Measure	Score*	Measure	Score*		
Agricultural Resources (Criteria Group Weight = 5%)									5
Distance to nearest watercourse/waterbody from MTS (metres)	<10m away = 1, Between 15m and 10m away = 3, >15m away = 5,	13m away	3	18 m away	5	1m away	1	A small waterbody is located south of Site #1. A tributary of Ganateskiagon Creek runs parallel to the north edge of Site #2. A small unnamed tributary runs parallel to the southern edge of Site #3.	
Potential to affect Species at Risk (SAR)	Yes = 0, No= 5	No	5	Yes	0	No	5	Suitable habitat for Redside Dace was identified by the MNRF in Ganateskiagon Creek, a tributary of which is 18 m away from the north edge of Site #2.	
Creation of new forest edge habitat	High = 1, Moderate = 3, Low = 5	Moderate	3	Low	5	High	1	Removal of lots of trees at Site #3 will create additional edge forest habitat and loss of interior forest habitat.	
Potential to affect source protection areas (e.g. Highly Vulnerable Aquifer (HVA), Significant Groundwater Discharge Area, Intake Protection Zone)	High % the Site area covered= 1, Moderate % of the Site area covered = 3, Low % of the Site area covered = 5	Moderate	3	Low	5	High	1	Highly Vulnerable Aquifers (HVA) were mapped underneath all three sites. HVAs cover 64% of Site #1, 34% of Site #2, and 100% of Site #3. Significant groundwater recharge areas were mapped underneath approximately 4% of Site #3, and are not present at Site #1 or Site #2. Intake Protection Zones are not present on either Site #1 or Site #2; however an intake protection zone covers approximately 7% of Site #3.	
Potential disturbance to Toronto and Region Conservation Authority (TRCA) regulated areas from MTS construction and transmission line upgrade	High = 1, Moderate = 3, Low = 5	High	1	Moderate	3	Low	5	Longer transmission line upgrades will potentially affect additional TRCA areas.	
Significant woodlands	Present = 0, Not present = 5	Present	0	Not present	5	Present	0	The MNRF indicated Sites #1 and Site #3 contain parts of significant woodlands.	
Proximity of MTS and transmission line upgrade to ANSI, ESA, or other protected areas	Overlaps MTS Site = 1, Borders = 3, None Nearby = 5	Borders MTS Site	3	None	5	Within MTS Site/ Overlap	1	Site #1 is bordered by an unidentified/unevaluated wetland. Site #3 is in an ESA designated in the Official Plan.	

Components	Scoring System*	Alternative Sites						Comments	Weight (%)
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)			
	Max Score = 5 Min Score = 0	Measure	Score	Measure	Score*	Measure	Score*		
Agricultural Resources (Criteria Group Weight = 5%)									5
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			13.3		22.7		14.7		
Component	Scoring System*	Alternative Sites						Comments	Weight (%)
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)			
	Max Score =5 Min Score=0	Measure	Score	Measure	Score*	Measure	Score*		
Recreation Resources (Criteria Group Weight = 5%)									5
Potential to affect trails	Present = 0, Not present = 5	Trail present	0	Trail present	0	Not present	5	Sections of transmission line to be upgraded cross the Seaton Hiking Trail.	
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			0		0		5.0		
Visual and Aesthetic Resources (Criteria Group Weight = 5%)									5
Potential to affect views of existing and future residential developments (i.e. do residents have the opportunity to consider purchasing a home where the Seaton MTS is visible?)	Opportunity = 5, No Opportunity = 5	Opportun ity	5	Opportun ity	5	No Opportun ity	0	Future home buyers near Sites #1 and #2, have the opportunity to consider the Seaton MTS in their decision towards purchasing a home. The area around these sites is also currently undeveloped. However, homeowners (existing and future) near Site #3 already include Cherrywood TS and other developed residential areas affecting views/ the visual aesthetics.	
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			5.0		5.0		0		
Technical & Cost Considerations (Criteria Group = 20%)									20
Distance from MTS to expected load	Longest = 1, Medium = 3, Shortest = 5	Medium	3	Shortest	5	Longest	1	Shorter distances from the MTS to demand load reduce electrical losses.	
Length of transmission line upgrades required	Longest = 1, Medium = 3, Shortest = 5	Longest	1	Medium	3	Shortest	5	Shorter lengths of transmission line upgrades reduce the potential for negative environmental effects and reduce cost.	
Length of distribution feeders needed to be extended	Longest = 1, Medium = 3, Shortest = 5	Medium	3	Shortest	5	Longest	1	Close proximity to municipal or regional roads will access and connection to existing feeder egress routes. Shorter lengths of distribution feeders reduce the potential for negative environmental effects and reduce cost.	

Components	Scoring System*	Alternative Sites						Comments	Weight (%)
		Site #1 (Brock Road)		Site #2 (Sideline 22)		Site #3 (Cherrywood)			
	Measure	Score*	Measure	Score*	Measure	Score*			
*Max Score = 5 Min Score = 0									
Agricultural Resources (Criteria Group Weight = 5%)									5
Duration of construction (months)	Longest = 1, Medium = 3, Shortest = 5	Longest	1	Medium	3	Shortest	5	The longer lengths of transmission line upgrades would increase construction duration.	
Approximate cost of construction	High = 1, Moderate = 3, Low = 5	High	1	Moderate	3	Low	5	Approximate cost is related to length of transmission line upgrade, duration of construction, complexities associated with work, site preparation, and landscaping costs.	
Weighted Score (%) (Sum of components)/(Max Score of all Components) x (Weight)			7.2		15.2		13.6		
TOTAL SCORE (out of a possible 100%)	*Highest score means lowest project impact and least potential to effect the surrounding environment .		45.7		70.1		53.1		100



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Reference: Appendix B, page 13

Question:

Regarding Seaton TS, option 10 is to construct Seaton TS at site 3. Option 7 involves constructing additional supply from Sheppard TS in addition to the construction of Seaton TS at site 3.

a) Although option 7 appears to involve broader scope (i.e. additional supply for Sheppard TS), it has a lower capital cost than option 10. Please explain why.

Response:

The cost noted in both options were estimated by the Independent Electricity System Operator ("IESO") as part of the 2016 Pickering Ajax Whitby Integrated Regional Resource Plan ("IRRP"). Further details can be found in the Distribution System Plan: Appendix A (Capital Program Narratives) Section S1; Pickering-Ajax-Whitby IRRP Report, Appendix B, pages 9-18. Option 7 included eight (8) feeders from Site 3, and two (2) feeders from Sheppard TS. Option 10 included eight (8) overhead and two (2) underground feeders from Site 3. The Site 3 configuration was not the same in both options. Although Option 7 appears to have a broader scope, we believe that the difference in feeder arrangements account for the lower cost in Option 7.

The IRRP- Pickering-Ajax-Whitby Sub-region table reproduced in Appendix B, page 11 of Ellexicon Energy Inc.'s ("Ellexicon") 2022 Rate Application incorrectly labelled all option costs as being in terms of Total Gross CAPEX and Total Net CAPEX spending. However, only costs for Options 1, 2 and 3 were correctly expressed in terms of capital expenditure (\$MM), as Options 4-10 were a reproduction of the IESO option cost analysis and those



figures were net present value (“NPV”) costs. In order to ensure comparability, Elexicon has recreated the table below, which identifies all costs in terms of NPV:

OEB Staff-2 Table 1: Seaton TS Option Analysis NPV

	1	2	3	4	5
Scenario Description	Current Plan to build Seaton TS at Site 2	Maintain the status quo of the system – Do Nothing	Non-Wire Alternatives to address Load Growth in the area	Use Malvern TS 27.6 kV Capacity and build Seaton TS at Site 1 or 2	Use Malvern TS 27.6 kV Capacity and build Seaton TS-3 and associated Feeders
Net Present Value	\$60M-\$68M ¹	N/A	\$146M-\$154M ²	\$93M-109M ¹	\$104M-119M ¹

Number	6	7	8	9	10
Scenario Description	Provide additional supply from 27.6-kV Sheppard TS and build Seaton TS at Site 1 or 2	Provide additional supply from 27.6-kV Sheppard TS and build Seaton TS at site 3 and associated feeders	Provide additional supply for Shepard TS, followed by additional supply from Malvern, and then build Seaton TS at Site 1 or 2	Provide additional supply for Shepard TS, followed by additional supply from Malvern, and then build Seaton TS at site 3 with associated feeders	Build Seaton TS at site 3 alongside its associated feeders
Net Present Value³	\$73-84M	\$91-102M	\$105-124M	\$113-130M	\$94-108M

Notably, the preferred option, Option #1, which involves building the Seaton TS at site 2, has the lowest NPV of any option analyzed and is significantly lower than either option 7 or 10.

¹ Calculated by IESO in the *Pickering-Ajax-Whitby Integrated Regional Resource Plan*, June 30, 2016

² Based on a three-year deferral of Seaton TS following battery storage investment on the 27.6 kV system, with 6% discount rate

³ Calculated by IESO in the *Pickering-Ajax-Whitby Integrated Regional Resource Plan*, June 30, 2016



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Reference: Appendix B-2, page 15

Question:

Elexicon notes that it used a competitive procurement process for all major purchases on the Seaton TS project.

a) Please provide further details on the procurement process including how Elexicon evaluated the quotes/bids it received.

Response:

The Elexicon Energy Inc. (“Elexicon”) procurement process followed for this project was to use detailed specifications to solicit competitive bids from at least three qualified vendors for major expenditures, such as: engineering services; power transformers; switchgear; protection and control; and the construction general contractor. All potential bidders were screened to ensure that they had sufficient relevant experience, and had acceptable references for similar work from other Ontario local distribution companies (“LDCs”).

Bids were then evaluated and scored on cost (i.e., initial capital cost and OM&A costs), technical conformance, references, experience, delivery, and ongoing support. Scoring was assigned to each evaluation category, and the overall highest score determined the vendor of choice. Elexicon worked in conjunction with another LDC that was also in the market for major equipment for a transformer station of their own. Major equipment suppliers agreed to additional discounts (typically in the range of 1.5-3%) if both LDCs purchased from the same suppliers due to expected design and fabrication efficiencies



of having two similar orders at the same time. The LDC purchasing processes were conducted independently in accordance with each company's purchasing policies.

At the end of the process, Elexicon realized savings of approximately \$0.11MM and \$0.056MM on the purchase of the power transformers and gas insulated switchgear, respectively, related to this cooperative approach.

b) Has Elexicon done any benchmarking or comparison of the costs of the Seaton TS project? If so, please provide this information.

Response:

Yes, Elexicon Energy Inc. ("Elexicon") has completed benchmarking of the costs for the Seaton TS project. The initial project budget was based on data from several recent (at the time of project initiation in 2016) similar Ontario LDC projects.

In addition, updated budgetary costs, for major equipment and services were solicited from vendors to validate the budgets as part of the Seaton TS initial business case. The aforementioned business case was filed in response to SEC-1. Further, Elexicon's consultants have many other projects in this sector and have recent experience, in order to compare dynamic aspects such as construction and material costs. Additionally, Hydro One Networks Inc.'s provision of pricing for its construction of the Seaton TS provided a means to compare the costs to the expected Elexicon costs to construct Seaton TS.



c) What are Elexicon's processes for evaluating and approving any variance to project scope, schedule and cost?

Response:

Scope, schedule and cost baselines were set at the onset of the Seaton TS project. With respect to the process for evaluating and approving variances to these baselines, the General Contractor submits a Change Order describing the proposed change to scope, budget and/or schedule and provides supporting documentation and rationale to support the change.

Change Orders related to the planning phase (e.g., Environmental Assessment, archaeological investigation, consultation with First Nations, etc.) are submitted directly by the General Contractor to Elexicon's Project Manager.

Proposed changes to the design and construction phases are submitted to the Project Engineer and a recommendation is made to Elexicon's Project Manager to approve/modify/reject the request.

In both instances Elexicon's Project Manager engages the Project Sponsor and other team members, as required, depending on the nature of the request before approving the Change Order, to verify the reasonableness of the request and resulting changes.

Change Orders that have a financial impact are also required to comply with Elexicon's Purchasing Policy, which prescribes the expenditure authority based on the corresponding approval limit, with the CEO having expenditure authority for authorizations between \$200,000 and the budget limit. Expenditures over the budget limit must receive both CEO approval and be provided to Elexicon's Board of Directors. To date, all project costs for Seaton TS have remained within the approved budget limit.



d) Is Elexicon's general contractor for this project responsible for any cost overruns? What steps have Elexicon taken to mitigate the risk of cost overruns and the resulting impact on rates to customers?

Response:

In order to mitigate potential cost overruns, Elexicon has employed a stipulated price contract with the General Contractor which generally follows the Canadian Construction Document Committee ("CCDC") 2 format. Generally, the General Contractor is responsible for any cost overruns. Exceptions can result from: changes in scope of work (minor unforeseen changes); and conditions outside of the control of the contractor (i.e., escalation of material costs due to the pandemic). Elexicon continuously monitors: the overall project budget; tracks all change orders; and regularly communicates risk issues to its Executive Leadership Team. In addition to the CCDC 2 contract in place with the General Contractor, Elexicon has also utilized the services of consulting firms with a long history of work on Transformer station projects for both the Owner's Engineer services and detailed design engineering, in order to identify and avoid potential risks as early as possible.



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Reference: DSP, Appendix S-1, pages 8-12

As noted in the DSP, the 2016 IRRP forecasted that the Whitby TS 27.6kV LTR would be exceeded by 2018. However, as shown in Figure 10 on page 11, the actual loading of Whitby TS 27.6kV in 2019 was less than half of its LTR.

Furthermore, as noted on page 12, as of 2019, the large influx of customers from the Seaton Area has still not yet occurred as originally forecasted.

Question:

a) When does Elexicon forecast the additional load from the Seaton area to materialize? At what point, if Seaton TS were not constructed, does Elexicon expect the LTR for Whitby TS' 27.6kV system to be exceeded?

Response:

If Seaton TS is not constructed as proposed, based on the most up-to-date and best available information, Elexicon expects to exceed the Limited 10-day Rating ("LTR") of the Whitby TS 27.6 kV system in 2023.

The original load forecast referenced in the 2016 Integrated Regional Resource Plan ("IRRP") was based on the 20 Years Population Forecast published by the City of Pickering in 2014. Since then, Elexicon Energy Inc. ("Elexicon") and the City of Pickering have observed slower than projected growth in the Seaton area. In 2020, the City of Pickering updated its 20 Years Population Forecast¹ to reflect the slower growth.

¹ <https://www.pickering.ca/en/business/resources/20YearPopulationForecastACC.pdf>



Currently, the Whitby TS T1/T2 27.6kV has been bearing the burden of developments around the Seaton region and it can only continue connecting additional loads until 2023. Based on the updated 2020 population projection, the load will continue to grow and materialize over the next 20 years. Even at the current growth rate, if Seaton TS is not constructed, the Whitby TS will exceed its Limited 10-day Rating (“LTR”) by 2023.

OEB Staff-4 Table 1 below shows the updated load forecast for the Whitby TS 27.6kV system. The load from 2018 to 2021 reflects actual recorded values, while 2022 to 2026 reflects the updated forecasted load calculated based on the methodology used in the 2020 Regional Infrastructure Planning (“RIP”) report.

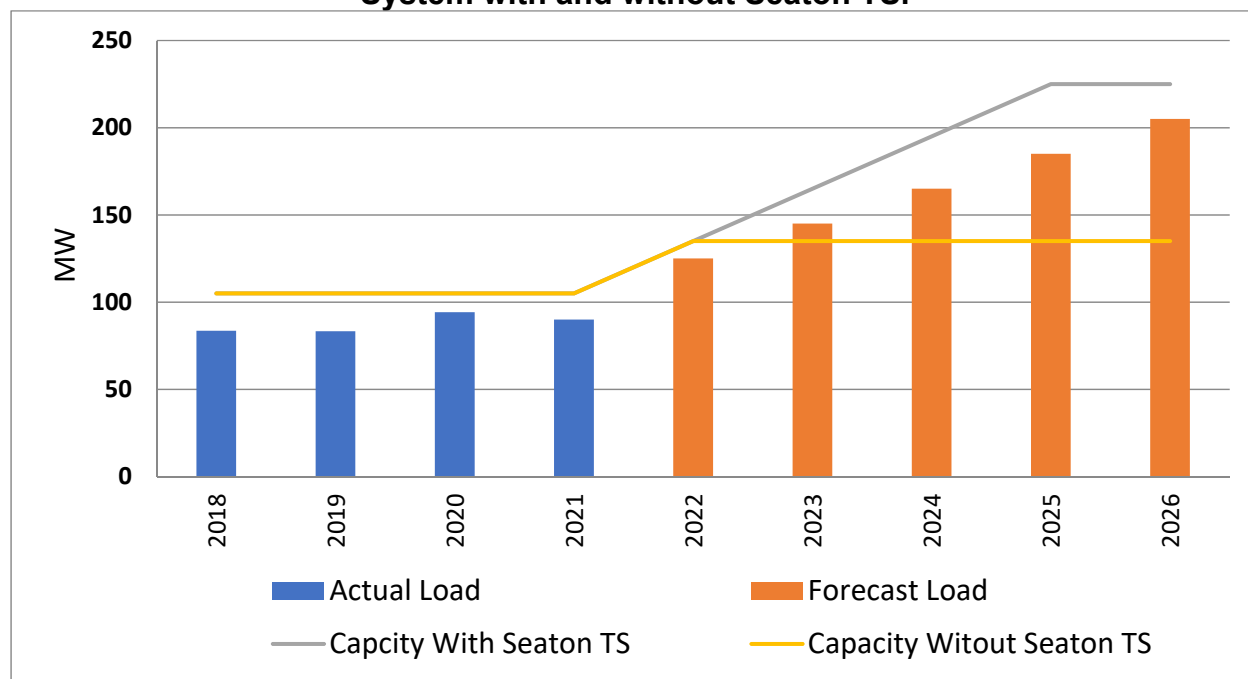
OEB Staff-4 Table 1 – Whitby TS T1/T2 27.6kV Load Forecast

	Actual Load				Forecast Load				
Station	2018	2019	2020	2021	2022	2023	2024	2025	2026
Peak Load(MW)	44	43	50	49	80	90	90	90	90
LTR (MW)	90	90	90	90	90	90	90	90	90

The construction of the Seaton TS will also contribute to meeting the demand of the overall 27.6 kV system and increase overall reliability. Figure 1 below displays the load and capacity of the entire Ajax and Pickering 27.6 kV system, and shows that the 27.6 kV system will reach its maximum capacity by 2023 if the Seaton TS is not constructed. The increased capacity in 2022 is the result of energizing the last two feeders from Whitby TS while the capacity increase beyond 2023 is attributed to Seaton TS coming into service.



OEB Staff-4 Figure 1 – Loading vs Maximum Capacity for Ajax Pickering 27.6 kV System with and without Seaton TS.



b) What is the current progress on the new residential developments in the Seaton area?

Response:

Elexicon has connected approximately 1,000 customers in the Seaton area as of September 2021 which aligns with the City of Pickering's 2020 Population Forecast. Elexicon is actively working with multiple developers to support future phases of residential development in the Seaton area.



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Reference: GTA East – 2019-2024 Regional Instructure Plan, February 29, 2020, pages 23, 31

Reference: DSP, Appendix S-1, page 26

Question:

The 2019-2024 Regional Instructure Plan noted that “...Seaton MTS is under construction” and is forecasted to be in-service in 2021. This plan was released in 2020.

Elexicon’s current DSP, dated April 1, 2021, notes that the land for Seaton TS is planned to be bought in 2021 but the start date to the project is unknown.

a) Has construction commenced on Seaton TS? If so, when did it start?

Response:

Elexicon Energy Inc. (“Elexicon”) confirms that construction on Seaton TS has started. Construction activities commenced on October 25, 2021.

b) Please explain the reason for delaying the in-service of Seaton TS from 2021 to 2022.

Response:

The in-service date of Seaton TS was delayed from 2021 to 2022 as the City of Pickering Site Plan Approval and Building Permit approvals were slower than anticipated. Additionally, the process to secure the land from the landowner, the Province of Ontario, took longer than expected. Elexicon invested considerable time to ensure proper consultation with First Nations, prior to Infrastructure Ontario, representing the Province of Ontario, entering into the license agreement with Elexicon for the station site.



In the DSP, regarding Seaton TS, Elexicon notes that: “The start date, expenditure timing, and in-service date are uncertain at this time.”

c) What is the current status of the Seaton TS project?

Response:

Please see the response to part a) above.

d) What confidence does Elexicon have that Seaton TS can be placed in-service in 2022? Approximately when in 2022 does Elexicon expect to put Seaton TS in-service?

Response:

Given that construction has started on Seaton TS, Elexicon expects that the project will be placed in-service by November 2022.

Consistent with the Ontario Energy Board’s (“OEB”) *Report of the Board – New Policy Options for the Funding of Capital Investments: The Advanced Capital Module*, dated September 18, 2014, Section 7.4 states that, “*at the time of the next cost of service or Custom IR application, a distributor will need to file calculations showing the actual ACM/ICM amounts to be incorporated into the test year rate base. At that time, the Board will make a determination on the treatment of any difference between forecasted and actual capital spending under the ACM/ICM, if applicable, and the amounts recovered through ACM/ICM rate riders and what should have been recovered in the historical period during the preceding Price Cap IR plan term.*”

Ratepayers are held harmless for the timing differences referenced in the interrogatory above. Elexicon expects to clear the variance account at the time of its next rebasing.



e) Is there a risk register for this project? If so, please provide it.

Response:

Yes, there is a risk register for this project. It is provided in response to OEB Staff-5, as Attachment A.



Project Risk Assessment and Mitigation Matrix

Project Name
Project Manager
Project Sponsor
Date Last Updated

Seaton MTS #1
Craig Smith, Manager, Stations and System Control
Moranne McDonnell, VP, Distribution Operations
27-Oct-21

ID	Date Identified	Date Last Modified	Risk	Risk Type	Root Cause	Potential Impact	Probability	Prob Score	Impact	Impact Score	Risk Level	Risk Score	Responsibility	Mitigation Strategies	Comments	Status
01	15-Feb-17	14-Sep-21	Construction delay; in-service delay	Reputational; Financial	Delay receiving SPA, Building Permit and/or TRCA permit	Miss in-service date; contractor claims	Moderate	0.50	Major	0.9	Medium	0.45	IBI/Elexicon	Do not issue Notice of Commencement until permits are received to avoid contractor claims. Ensure regular communication with permitting agencies on status of permits.	All permits obtained as of September 2021	Closed
02	15-Feb-17		In-service delay	Reputational; Financial	Deficiency in application to IESO	Delays from HONI/IESO approvals could cause delay in energization	Unlikely	0.30	Minor	0.3	Low	0.09	All	Submit the application as early as possible to allow for revisions to application if needed; use consultant (CIMA) to review application prior to submission; noted on Master Schedule as a dependency to energization		Open
03	15-Feb-17	14-Sep-21	Design delay	Construction/Reputational/Financial	EA late	Design and construction delay; potential design extras	Unlikely	0.30	Minor	0.3	Low	0.09	Elexicon		EA complete	Closed
04	15-Feb-17	01-Oct-21	Project Delay	Construction/Reputational	Property Acquisition	Overall delay	Unlikely	0.30	Moderate	0.5	Medium	0.15	Elexicon	Regular communication with IO to execute agreements.	Sept 14- Per Ash Kothiyal at IO (Aug 17), they will honour land cost at \$300,000 per acre. (\$400k * 0.75 factor for easements). Temp licences now executed.	Closed
05	15-Feb-17		Energization delay and contractor delay claims	Construction/Financial	Manufacturing Delay	Late delivery of prepurchased equipment could cause valid delay claims	Unlikely	0.30	Major	0.9	Medium	0.27	Elexicon	Timely tendering of prepurchased equipment. Ensure sufficient advance notice given to ensure timely delivery to site. Add as dependency to Master Schedule to track ordering dates.		Open
11	18-Jul-17	08-Nov-18	CCRA not signed with HONI	Construction/Reputational/Financial	Veridian not accepting full costs for TX rebuild are on project alone	No transmission line rebuild done by HONI, no supply ready for Seaton MTS in time	Unlikely	0.30	Major	0.7	Medium	0.21	Elexicon	Update: Nov 8, 2018- CCRA signed with HONI. Risk eliminated		Closed
06	15-Feb-17	01-Oct-21	In-service delay	Construction/Reputational/Financial	Weather	Design delay	Unlikely	0.50	Moderate	0.5	Medium	0.25	Elexicon	Allow sufficient time for construction. June 1, 2020- Final design step to be completed once buffer areas are understood from burial investigation. Sept 14- IBI using latest buffer dimensions from archaeologists at WSP in SPA submission in early Sept.	Design completed, risk eliminated	Closed
07	15-Feb-17	01-Oct-21	Budget overruns	Financial	Fluctuating currency, scope creep	Market conditions (including exchange rates) could affect projected budget.	Unlikely	0.30	Moderate	0.5	Medium	0.15	Elexicon	Follow competitive purchasing to ensure best pricing. Monitor project expenditures closely and ensure any additional costs are warranted prior to authorizing.	March 9, 2020- All significant purchases have been completed or quoted.	Open

08	15-Feb-17	01-Oct-21	Design cost overruns	Financial	Information not provided in timely manner	Delays in providing information can lead to work being completed multiple times	Unlikely	0.30	Minor	0.3	Low	0.09	Elexicon	Pace design progress with receipt of archaeological information to reduce design rework	Design completed, risk eliminated	Closed
09	09-Jun-17	01-Oct-21	Potential Loss Of Collaboration With Halton Hills GIS Switchgear Tender	Financial	Spec from IBI not ready in time for joint RFP issue	Loss of group discount, and opportunity for collaborative effort.	Unlikely	0.10	Minor	0.3	Low	0.03	IBI	Ongoing communication with Halton Hills to coordinate procurement	Procurement successful to result in savings to project	Closed
10	09-Jun-17		IBI Project Management	Construction/Reputational/Financial	Weak PM skills	Communication/Schedule	Unlikely	0.30	Major	0.9	Medium	0.27	IBI	Secure new PM	New PM secured; risk resolved	Closed
11	16-Oct-17	01-Oct-21	Project Delay	Construction/Reputational/Financial	Archaeological Findings	Design Delay, additional costs for Stage 3 & Stage 4 Arch reports, potential additional costs for mitigation, potential additional costs for relocation of station site	Moderate	0.90	Minor	0.5	Medium	0.45	Elexicon	Update project schedule to determine new construction start date; review updated load forecasting to ensure existing system capacity until TS is in service. Estimate additional costs related to archaeology and cover from contingency allowance.	Archaeological work complete. Station redesign work complete.	Closed
12	11-Apr-19	01-Oct-21	Construction delay	Construction/Reputational	HONI TX Work Completion	Delays from HONI Construction of TX connection to Seaton	Unlikely	0.30	Minor	0.3	Low	0.09	Elexicon/HONI	Include on Master Schedule as a dependency; identify Earliest Start for HONI to complete tap line work to minimize risk of delaying energization	All work complete except tap line.	Open
13	14-Sep-20	01-Oct-21	Construction delay; in-service delay	Reputational; Financial	Archaeological	Human remains identified- has added significant additional fieldwork, consultation and reporting to the project costs and schedule. Buffer area to be determined poses risk to current station layout.	Likely	0.70	Moderate	0.5	Medium	0.35	Elexicon	Expedite report completion to confirm acceptance of burial site buffer. Adjust station layout as required. Update schedule. Check load forecasting to ensure revised in-service date keeps pace with current pace of development which has been slower than anticipated.	Buffer limits determined. Station redesign work completed	Closed
14	06-Nov-20	01-Oct-21	Construction delay	Construction/Financial	Excess excavated soils	Potential timing and cost impact from need to find appropriate location for soil disposal/storage following foundation excavations	Likely	0.70	Minor	0.3	Medium	0.21	Elexicon	Complete chemical analysis to confirm disposal options and costing. Consult with FN, TRCA and CoP to confirm no concerns removing soil offsite; ensure costs are carried in GC contract	Excess soils can be disposed off site per chemical analyses, FN consultation and permission from City of Pickering. Disposal fees included in GC costs.	Closed
15	06-Nov-20	01-Oct-21	Financial Recovery Risk	Financial	Project completion in Q4 2022	Potential Risk of not recovering costs for all 12 months of 2022, if station not in-service until Nov 2022	Moderate	0.30	Moderate	0.5	Medium	0.15	Elexicon	n/a - OEB decision		Open
16	26-May-21	01-Sep-21	Construction delay	Reputational; Reliability; Financial	Delay executing Site Disposition Agreement	Site Disposition Agreement was an unforeseen process to the project approvals phase.	Moderate	0.50	Major	0.7	Medium	0.35	Elexicon	Site Disposition Agreement relates to burial site. Project was relocated away from burial site to mitigate this risk. Obtain legal advice to negotiate with IO and MGCS to obtain temporary license while SDA is executed. Obtain First Nations support with proposed approach to ensure no concerns.	Support received from all First Nations who responded. Documentation provided to MGCS and IO. Elexicon to continue to support IO and MGCS through SDA process to provide continuity in consultation with First Nations. Licenses for construction obtained and several Field Liaison Agreements executed with First Nations.	Closed
17	01-Sep-21		In-service delay	Reputational; Reliability; Financial	Prolonged adverse weather	Prolonged adverse weather pushes in-service date to 2023	Unlikely	0.30	Minor	0.1	Low	0.03	Elexicon	Current load forecasting shows existing system will still have capacity beyond end of 2022. Obtain regular updates on load forecasting from engineering; provide regular updates to Finance team if 2022 in-service date will not be achieved.		Open

18	01-Sep-21		Ownership risk	Reputational; Reliability	Vs HO owned. Operation, maintenance, emergency response, equipment failure	Longer restoration times; Loss of Supply metrics	Moderate	0.50	Major	0.7	Medium	0.35	Elexicon	Ensure personnel and equipment are trained and available. Job training materials and training, power restoration plan updated, in advance of TS being energized.		Open
19	01-Sep-21	27-Oct-21	In-service delay	Reputational; Reliability; Financial	Prolonged shutdown due to COVID outbreak	Pushes in-service date to 2023	Unlikely	0.30	Minor	0.3	Low	0.09	Eptcon	Ensure General Contractor has COVID transmission prevention plans include in site safety. Elexicon contractors must comply with Nov 1/21 vaccine policy.		Open
20	01-Sep-21		Ownership risk	Reputational; Reliability; Financial	Ongoing O&M costs are not adequately budgeted for	Increased risk of equipment failure from inadequate inspection/maintenance	Unlikely	0.30	Major	0.5	Medium	0.15	Elexicon	Ensure in OM&A budget. Emergency response plans. Spare parts up to and including a third power transformer need to be considered.	200k/yr estimated in June 2015 memo to board. Spare transformer purchased as recommended.	Open
21	01-Sep-21		In-service delay	Reputational; Reliability; Financial	Equipment stored at remote locations are not delivered in time to meet energization schedule	Pushes in-service date to 2023	Unlikely	0.10	Minor	0.3	Low	0.03	Elexicon	Ensure adequate delivery time. Add as dependencies to Master Schedule, and check in with suppliers leading up to delivery being scheduled to ensure no significant delays will occur.	Switchgear in Montreal. Transformers in Winnipeg.	Open
22	01-Sep-21		Budget	Financial	Unfavourable soils are encountered during construction	Added costs to remediate soil/replace with engineered soils, dispose of offsite	Unlikely	0.10	Minor	0.3	Low	0.03	Elexicon	Extensive soil testing has been completed at the site, therefore risk of extensive issues is low. If encountered, quickly delineate extent of issue and consider various options to mitigate depending on the nature of unfavorability, to select the highest ranked option		Open
23	01-Sep-21		Budget	Financial	Schedule creep pushes critical elements of work into unfavorable weather conditions	Increased project costs	Unlikely	0.10	Moderate	0.3	Medium	0.03	Elexicon	Monitor construction progress against schedule in conjunction with weather forecasts to avoid additional costs by expediting select elements of work where a cost benefit can be demonstrated		Open
24	01-Sep-21		Construction delay	Reputational	Non-responsive First Nation community objects to construction	Pushes in-service date to 2023	Unlikely	0.10	Minor	0.5	Low	0.05	Elexicon	Continue to pursue Field Liaison agreements with all 10 caretaker First Nations. Continue to provide updates and offers to participate in the project, and assist in the successful execution of the SDA.	MSIFN have indicated interest in Field Liaison monitoring but do not have internal structure to support this. Meet with MSIFN to better understand needs to accommodate this. Six Nations unavailable to monitor but has requested to continue to be updated.	Open
25	15-Sep-21		Construction delay	Financial	TD Line of Credit increase denied or delayed	Pushes in-service date to 2023	Unlikely	0.10	Minor	0.3	Low	0.03	Elexicon Provide TD Reputational Risk Committee with required documentation to confirm consultation with First Nations		Complete	Closed
26	01-Feb-19	30-Jun-21	Construction delay	Reputational, Financial	Power Transformers not available, due to bushing concerns	Delay to inservice date	Moderate	0.50	Major	0.7	Medium	0.35	Elexicon	Testing completed successfully. Risk eliminated.		Closed



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Reference: Appendix B, pages 6

Question:

Elexicon VRZ's 2022 net capital expenditures is significantly higher than historical years. Even if the \$40.8M cost of Seaton TS is removed, Elexicon VRZ's 2022 net capital expenditures would be \$39.5M. This amount is \$12.0M (44%) higher than Elexicon VRZ's five-year historical average spending (2017-2021) of \$27.5M.

In particular, OEB staff notes that Elexicon VRZ's 2022 system renewal spending of \$21.2M is \$8.3M (64%) higher than the five-year historical average (2017-2021) of \$8.3M.

a) Has Elexicon made any adjustments or deferrals to its capital spending in 2022 (particularly in system renewal) to help levelize or reduce the significant increase in 2022 capital spending?

Response:

Yes, system investment adjustments are an important part of Elexicon Energy Inc.'s ("Elexicon") planning process; 2022 is not an exception to this process. Elexicon's 2022 capital forecast is a result of systematic adjustments driven by system needs identified by the Asset Condition Assessments ("ACA") and the Asset Replacement Plan ("ARP"). This is particularly impactful to system renewal investments. Continuing to spend the historical average on system renewal would not be in accordance with good utility practice, in light of the ACA and ARP results provided in Appendix F and Appendix G of the Distribution System Plan ("DSP"), respectively.



A simple historical average between 2017-2021 includes in that averaging methodology years where system renewal spending was unexpectedly slowed due to the impact of the COVID-19 pandemic. Consequently, a five year historical average is not a reasonable comparator to a plan for 2022 and into the future. Further, two of the years in the specified five year range were prior to the amalgamation of Veridian Connections Inc. and Whitby Hydro Electric Corporation. The years 2017 and 2018 were subject to the decision making of a different Management team. Therefore, a straight five year historical average is not informative in the context of the current application.

Elexicon follows a rigorous capital planning process that begins with the identification of system needs and the creation of a project scope to address those needs. The project scope documents outline key information such as: drivers; scope of work; costs; benefits; alternatives; and priority. A priority score is calculated for each project and used to prioritize Elexicon's overall budget. The budget prioritization process is a multi-phase, multi-criteria approach that objectively and consistently ranks budget items using quantitative and qualitative methods. It allows Elexicon to assess the risk associated with projects and ensure alignment with Asset Management objectives that are consistent with OEB's *Renewed Regulatory Framework* ("RRF"). The details of the process are presented in the Distribution System Plan, Section 5.4.1 (b). Elexicon completes this process annually and makes adjustments throughout the year as its needs evolve.

Elexicon is not seeking rate recovery for its incremental system renewal expenditure in this Application. Further, and by way of hypothetical example, even if the system renewal budget is levelized to a historical average for 2022, Elexicon's 2022 capital plan for the Veridian Rate Zone is still well above the ICM materiality threshold of \$18.8MM.



b) Please explain why Elexicon's system renewal budget is significantly higher in 2022 as compared to the historical average.

Response:

The variability in the system renewal budget is attributed to Substation Renewals that include stations transformers and breakers requiring attention that exceed their typical useful life ("TUL") and are in Poor or Very Poor condition.

Since the Substations Renewals are large capital-intensive investments, there will be variability year over year. However, they are paced prudently based on system needs along with information on allocation based on the historical average. The 2022 station expenditures are in line with previous spending in 2019 which was also mostly related to stations renewal as identified in OEB Staff-6 Table 1. A large number of renewal projects from 2020 were also deferred to 2021 and 2022, due to the unprecedented situation that arose from COVID-19, further strengthening the need to concentrate on priority station renewal investments.



**Staff-6 Table 1: Comparison of Historical (Reallocated) and Forecast System
Renewal Gross Expenditures (\$000s) – Distribution System Plan¹**

Program	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
Substation Renewal	3,748	3,902	3,441	7,518	2,970	7,079	9,404	2,644	860	3,460	810
Voltage Conversions - Reliability	-	8	-	426	685	531	900	2,329	3,318	2,781	4,300
Renewal Programs - Poles	2,028	1,945	1,907	6,484	1,565	1,200	2,400	2,200	2,096	2,390	4,640
Renewal Programs - Distribution Transformers	532	1,016	2,059	849	475	1,078	1,302	1,870	1,741	1,741	1,741
Renewal Programs - Switches/Switchgear s	1,556	1,740	1,651	1,924	1,796	1,317	1,525	1,595	2,125	2,125	2,125
Renewal Programs - Others	744	596	670	447	1,133	951	771	741	991	991	991
Renewal Programs - Rebuilds	5,416	5,551	5,282	5,475	2,598	5,645	5,296	8,297	6,928	2,729	1,329
Renewal Programs - Reactive	3,544	2,606	2,417	2,281	2,333	1,865	1,842	1,813	1,820	1,820	1,820
Total	17,568	17,365	17,427	25,043	13,555	19,667	23,441	21,490	19,878	18,037	17,756

* In 2020, during the COVID-19 pandemic, much of the system renewal work was deferred to protect the health and safety of staff, and Elexicon focused primarily on reactive replacements and emergency maintenance. As such, the 2020 spending under COVID-19 has skewed the overall historical average results and thus is not an accurate indicator to define level of spending for future years.

¹ Based on Table 5.4-18 of the DSP (Page 194)



OEB STAFF – 7

Reference: Appendix B, pages 11-13

Question:

Elexicon's preferred option 1 for Seaton TS is to construct 12 feeders. By comparison, option 10 proposes to construct two initial feeders with two additional feeders installed every two years thereafter until there is a total of 8 feeders.

a) Please explain why Elexicon is opting to construct four additional feeders under option 1 and why option 1 does not consider a staggered approach to adding new feeders like option 10.

Response:

The Seaton TS design uses indoor medium voltage switchgear, which contains the circuit breakers that supply each feeder. Indoor switchgear is typically purchased with all of the planned circuit breakers/feeder positions at the start of the project. This is done to minimize future outages and costs. The egress feeders that connect the station feeder circuit breaker to the distribution system load will be added over time as load materializes. For 2022, Elexicon plans to connect 2 feeders to the new station.

The options summary included in Appendix B (pages 11-13) of Elexicon's 2022 Rate Application, indicates that only 8 feeders are included in the Distribution System Plan attachment-Integrated Regional Resource Plan ("IRRP") – Pickering-Ajax-Whitby Sub Region dated June 30, 2016, page 40. The options summary in Appendix B should have stated 10 feeders were included in this option, as was indicated in the original IRRP document. In the IESO analysis included in the IRRP, it indicates that a uniform feeder loading of 15.5MW is assumed. Elexicon's planning assumptions for the Seaton Transformer Station did not assume uniform loading and included two additional feeders



(for total of twelve) to accommodate operational flexibility to take feeders out of service when necessary and to accommodate non-uniform feeder loading. This planning approach is consistent with that of Hydro One Networks Inc. and that of other Ontario distributors.

The Option 1 design is based on purchasing the medium voltage switchgear with all 12 feeder positions, but staggering the connection to the load over time only when capacity is required.

b) Please discuss why it is prudent to install 12 new feeders, particularly when new customers and load have not materialized in the Seaton area as originally forecasted.

Response:

As stated in the response to part a) above, the station will be built with 12 feeder circuit breakers, but they will only be connected to the load over time as new load materializes.



OEB STAFF – 8

Reference: DSP, Appendix S-1, page 6, 27

Question:

Seaton TS will be owned and operated by Elexicon. As noted in the DSP, this is a new venture with additional complexity due to this being the first transformer station exclusively owned by Elexicon.

a) Was the option of a Hydro One Networks Inc. (HONI) owned transformer station considered? Why or why not?

Response:

The option of a Hydro One Networks Inc (“HONI”) owned transformer station was considered as part of the initial business case for Seaton TS. This option was identified in Section 3.6 Transformer Station Connection Options and Section 5.0 Economic Evaluation. The business case has been filed in response to SEC-2. The option of HONI station ownership was included in order to appropriately understand the financial impacts on Elexicon’s customers for both possible ownership options (i.e., Elexicon-owned versus HONI-owned).



b) If a HONI owned transformer station was a possible option, please discuss how the benefits of an Elexicon owned transformer station outweigh the additional costs of operating and maintaining a transformer station.

Response:

The benefits of an Elexicon-owned transformer station are discussed in the filed initial business case that has been included in the response to SEC-2. Section 5.0 Economic Evaluation evaluates the potential financial benefits of an Elexicon owned transformer station. As identified in Section 5.0, clear and continuing financial advantages for Elexicon and Elexicon's customers are expected from an Elexicon constructed, owned and operated station versus a HONI constructed, owned and operated station.

These advantages include expected lower capital costs to construct the project, as well as avoidance of payment of transformation charges for the life of the facility. This finding is not unique to Elexicon's Seaton TS project and the customer and utility benefits of LDC station construction, ownership and operation have been demonstrated in many other LDC Transformer station projects, including but not limited to those constructed by Halton Hills Hydro, Oakville Hydro and Festival Hydro. Elexicon does expect approximately \$0.2MM per year in additional operating and maintenance costs with the addition of Seaton TS. However, the overall financial benefit to customers and Elexicon of transformer station ownership by Elexicon greatly outweighs the costs to operate and maintain the facility.



OEB STAFF – 9

Reference:

Ref: ICM Model, Tab 9b

Ref: Kinetrics' Asset Depreciation Study for the Ontario Energy Board, July 8, 2010

Question:

Under the line item "Seaton TS – Station Building", Ellexicon has used a useful life of 25 years to calculate the amortization on this asset class.

a) Per the Kinetrics report, the range of useful lives for station buildings is 50-75 years. Please provide justification for the deviation from the report in useful life.

Response:

Ellexicon has reviewed the useful life of the Seaton TS – Station Building and agrees that it should be changed to 50 years to align with the Kinetrics report. An updated version of the ICM model is included as an attachment to this IR.

EE_VRZ_2022_ACM_ICM_Model_OEB Staff-9_20211108.xlsm

In addition, the ICM model has also been revised to reflect updated cost estimates related to Seaton TS. These changes are as follows:

1. Land - decreased from previously estimated \$1,400,000 to \$1,186,000 to reflect the actual purchase price;
2. Transformer – decreased from \$23,388,885 to \$19,313,000 to remove certain components and appropriately move them into other accounts to better reflect their depreciation. As a result, the following components have been removed from the Transformer costs and placed into:



i.	Poles, Tower & Fixtures	\$ 550,000
ii.	Overhead Conductor and Devices	\$ 400,000
iii.	Underground Conduit	\$ 250,000
iv.	Underground Conductor and Devices	\$ 250,000
v.	SCADA	\$2,500,000

While these changes mostly affect the depreciation schedule for some of the components, the overall budget remains the same at \$40,762,000. These revisions lead to a decrease in total revenue requirement for both ICM projects from \$3,769,644 to \$3,683,510 and results in a lower service charge rate rider for customers.

OEB Staff-9 Table 1: Change in Rate Riders

Rate Class	Unit	Previously		Revised	
		Service Charge Rate Rider	Volumetric Rate Rider	Service Charge Rate Rider	Volumetric Rate Rider
Residential	kWh	\$ 1.80	\$ -	\$ 1.76	\$ -
Residential Seasonal	kWh	\$ 3.29	\$ -	\$ 3.22	\$ -
GS <50kW	kWh	\$ 1.17	\$ 0.0012	\$ 1.14	\$ 0.0011
GS >50kW	kW	\$ 7.47	\$ 0.2304	\$ 7.30	\$ 0.2251
GS 3,000-4,999kW	kW	\$ 392.35	\$ 0.1459	\$ 383.39	\$ 0.1426
Large Use	kW	\$ 589.39	\$ 0.2055	\$ 575.93	\$ 0.2008
Unmetered Scattered Load	kWh	\$ 0.48	\$ 0.0012	\$ 0.47	\$ 0.0011
Sentinel Lighting	kW	\$ 0.31	\$ 0.9489	\$ 0.31	\$ 0.9272
Street Lighting	kW	\$ 0.05	\$ 0.2595	\$ 0.05	\$ 0.2535

Elexicon has also updated the VRZ 2022 Rate Generator Model to reflect these changes to the ICM Model.

EE_VRZ_2022_IRM-Rate-Generator-Model_OEB Staff-25_20211108.xlsb



OEB STAFF – 10

Reference: Appendix B-1

The estimated net CAPEX for the BRT relocation project is \$3.38 million.

Question:

a) Please explain how Elexicon created the estimate for this project.

Response:

Estimate for BRT was prepared using the unit costs of installation of major assets and applying these unit costs to the estimated quantities to determine the total cost. The quantities/scope is determined from the preliminary engineering design based on the project specifications and civil drawings provided by the owners' consultant. The customer contributions to this project were negotiated with and agreed upon, by the Region of Durham. The cost breakdown for the BRT Project using the most up to date data is shown in Table 1.



OEB Staff-10 Table 1: BRT Hwy 2 Project Estimate

BRT Hwy 2 - Estimate					
Description	Units	Unit Price	Total	Region of Durham Contribution	Elexicon Energy Net
Engineering	1	\$ 500,000.00	\$ 500,000.00	\$ -	\$ 500,000.00
Install Wood Pole (four circuit)	2	\$ 17,000.00	\$ 34,000.00	\$ 17,000.00	\$ 17,000.00
Install Wood Pole (three circuit)	20	\$ 15,000.00	\$ 300,000.00	\$ 150,000.00	\$ 150,000.00
Install Wood Pole (two circuit)	17	\$ 13,000.00	\$ 221,000.00	\$ 110,500.00	\$ 110,500.00
Install Wood Pole (one circuit)	8	\$ 11,000.00	\$ 88,000.00	\$ 44,000.00	\$ 44,000.00
Remove Wood Pole	43	\$ 500.00	\$ 21,500.00	\$ 10,750.00	\$ 10,750.00
Install 44kV LIS	1	\$ 85,000.00	\$ 85,000.00	\$ 42,500.00	\$ 42,500.00
Install 27.6kV Scadamate	1	\$ 83,000.00	\$ 83,000.00	\$ 41,500.00	\$ 41,500.00
Three Phase Distribution Riser (600A)	5	\$ 7,000.00	\$ 35,000.00	\$ 17,500.00	\$ 17,500.00
Three Phase Distribution Riser (200A)	8	\$ 4,000.00	\$ 32,000.00	\$ 16,000.00	\$ 16,000.00
Install Padmount Switchgear Foundation	3	\$ 5,000.00	\$ 15,000.00	\$ 7,500.00	\$ 7,500.00
Install Padmount Switchgear	8	\$ 114,000.00	\$ 912,000.00	\$ 42,000.00	\$ 870,000.00
Remove Padmount Switchgear	7	\$ 4,800.00	\$ 33,600.00	\$ 16,800.00	\$ 16,800.00
1/0 28kV Cable (m)	1020	\$ 25.00	\$ 25,500.00	\$ 12,750.00	\$ 12,750.00
500MCM 600V Cable (m)	1360	\$ 48.00	\$ 65,280.00	\$ 32,640.00	\$ 32,640.00
1000MCM 28kV Cable (m)	4080	\$ 180.00	\$ 734,400.00	\$ 367,200.00	\$ 367,200.00
1000MCM 46kV Cable (m)	2970	\$ 180.00	\$ 534,600.00	\$ 267,300.00	\$ 267,300.00
Installing Underground Primary Cable (m)	9430	\$ 18.00	\$ 169,740.00	\$ 84,870.00	\$ 84,870.00
Removing Underground Primary Cable (m)	9250	\$ 18.00	\$ 166,500.00	\$ 83,250.00	\$ 83,250.00
4000MCM 46kV Splice	12	\$ 2,000.00	\$ 24,000.00	\$ 12,000.00	\$ 12,000.00
4 Duct Concrete Encased Structure (m)	140	\$ 250.00	\$ 35,000.00	\$ 17,500.00	\$ 17,500.00
8 Duct Concrete Encased Structure (m)	110	\$ 325.00	\$ 35,750.00	\$ 17,875.00	\$ 17,875.00
12 Duct Concrete Encased Structure (m)	50	\$ 550.00	\$ 27,500.00	\$ 13,750.00	\$ 13,750.00
16 Duct Concrete Encased Structure (m)	120	\$ 725.00	\$ 87,000.00	\$ 43,500.00	\$ 43,500.00
20 Duct Concrete Encased Structure (m)	50	\$ 900.00	\$ 45,000.00	\$ 22,500.00	\$ 22,500.00
24 Duct Concrete Encased Structure (m)	130	\$ 1,125.00	\$ 146,250.00	\$ 73,125.00	\$ 73,125.00
Additional Civil Construction Labour (lump)	1	\$ 40,000.00	\$ 40,000.00	\$ 20,000.00	\$ 20,000.00
Distribution Switching Labour (5 person crew per day)	20	\$ 7,000.00	\$ 140,000.00	\$ 70,000.00	\$ 70,000.00
Inspection Services (per day)	40	\$ 680.00	\$ 27,200.00	\$ 13,600.00	\$ 13,600.00
Traffic Control (per day)	40	\$ 2,400.00	\$ 96,000.00	\$ 48,000.00	\$ 48,000.00
Boulevard, Curb, Asphalt, Sidewalk Restoration	1	\$ 50,000.00	\$ 50,000.00	\$ 25,000.00	\$ 25,000.00
Three Phase In-Line Disconnect Switch	3	\$ 2,500.00	\$ 7,500.00	\$ 3,750.00	\$ 3,750.00
SubTotal			\$ 4,817,320.00	\$ 1,744,660.00	\$ 3,072,660.00
Contingency (10%)			\$ 481,732.00	\$ 174,466.00	\$ 307,266.00
Total			\$ 5,299,052.00	\$ 1,919,126.00	\$ 3,379,926.00



Question:

- b) Has Elexicon benchmarked the costs of the relocation project against other similar sized projects? What steps has Elexicon taken to ensure that the amount of forecasted costs is appropriate?**

Response

Elexicon benchmarks the costs of road relocation projects against other comparable projects it has completed in the past. The following is an example of a cost comparison of overhead relocations projects based on major asset class (poles), where the number of poles provides an understanding of the scope and scale of each project.

OEB Staff-10 Table 2: Costs from Previous Overhead Relocation Projects

Budget number	Budget name	Project number	Project Name	Cost	number of poles
2013-0502	Westney Road (Magill x Rossland)	ACA.15.0164	Westney Road - Spraggings Lane Riser	\$26,972.26	1
2013-0502	Westney Road (Magill x Rossland)	ACA.15.0165	Westney Road - Hearne Cres. Riser	\$30,367.80	1
2013-0506	Hwy #407 - Relocations (Brock Road x SL 16)	ARR.12.0006	Hwy#407 & Brock Rd Relocations (Area's #2 & #3).	\$576,241.36	28
2013-0502	Westney Road (Magill x Rossland)	ARR.12.0010	Westney Road Widening, Phase 1	\$1,050,623.09	46
2014-0515	Ajax - Hwy #407/401 Link Road (Hwy# 2 x Bayly)- PERM	ARR.14.0104	401 & Lakeridge Permanent Crossing	\$1,668,202.88	31
2014-0516	Whitevale Bridge-relocations	ARR.14.0105	Whitevale Bridge Restoration	\$28,185.39	3
2015-0508	Golf Club Road Pole Relocations	ARR.15.0101	Golf Club Road Relocation	\$78,306.85	7

Following are some of the design considerations when determining a project scope and related costs:

- Overhead pole line work is estimated based on size, height, circuit configuration requirements as well as installation methods.



- Underground structures are estimated based on required number of ducts, trench type, ampacity requirements and physical boulevard capacity.
- Switchgear replacement costs are based on the unit type plus installation costs.
- Estimated costs involved with the required distribution switching are based on construction crew time and coordination with the System Control Center (SCC).

The BRT is unique in comparison to many road relocations projects undertaken by Elexicon in the past, as the majority of the work associated with BRT involves underground assets and projects primarily involving underground infrastructure are significantly more costly (on average 3 – 5 times) compared to equivalent overhead builds. BRT has the largest net cost of any road relocation project in the history of Elexicon, or either of its processors (Please see Elexicon's response to Staff-11 for a more thorough explanation of the uniqueness of the BRT project).

In the absence of a direct comparison with a similar full scope project, Elexicon has compared the estimated unit costs of major assets from past projects. The unit cost estimate is composed of labour, materials, vehicles, and subcontractor costs as shown in the examples in Table 3.



OEB Staff-10 Table 3: Examples of Historical Unit Costs

Major Assets / Installation	Cost Per Unit	Project #	Job #	Year	Actual Costs				
					Labour	Material	Vehicles	Subcontractor	Other
SCADA Load Interrupter Switch	\$ 82,660.05	2016-5508	ACA.16.0213	2017	\$29,641.08	\$ 42,755.37	\$7,289.27	\$ 1,905.33	\$ 1,069.00
SCADA Switchgear	\$ 113,950.36	2015-5510	ACA.15.0105	2017	\$11,126.90	\$101,353.21	\$1,470.25	\$ -	\$ -
PAD Transformer	\$ 20,134.49	2017-5515	ACA.15.0143	2017	\$ 6,850.62	\$ 12,407.87	\$ 141.50	\$ -	\$ 734.50
MANUAL Switchgear	\$ 76,325.56	2017-5514	ASP.16.0141	2017	\$21,818.99	\$ 54,417.32	\$ 89.25	\$ -	\$ -
Submersible Transformer	\$ 157,878.45	2016-5515	ACA.15.0193	2017	\$44,696.15	\$ 47,736.71	\$7,018.50	\$ 58,270.00	\$ 157.09

In order to ensure that the forecasted costs are appropriate, the quantities are based off project specifications and design drawings, provided by the owners' consultant. This allows Elexicon to consider factors such as road topography, surrounding builds, and proximity of above and below grade infrastructure, all of which can affect the scope and scale of the relocation work. Any change in the customer requirements are duly accounted for through a review of the original scope and related cost impacts.



OEB STAFF – 11

Reference: DSP, page 196, 206, 215

OEB staff notes that Elexicon has had similar, or in some cases larger, capital expenditures related to road relocations in historical years:

- **Page 196 shows that Elexicon had \$23.05 million in road relocations in 2021 vs. \$5.54 million in 2022.**
- **Page 206 notes that Elexicon has an average historical spending of \$7.84 million on road relocations.**
- **Page 215 has a table which shows that, on a net basis, Elexicon spent \$3.87 million in 2021 on road relocations and is forecasted to spend \$3.59 million in 2022.**

Question:

- a) Please explain the need for incremental capital funding for the BRT road relocation when this appears to be the only significant road relocation planned for 2022, and Elexicon has historically been able to fund similar or larger road relocation projects through base rates.**

Response:

In its application, Elexicon Energy Inc. ("Elexicon") has demonstrated that the BRT road relocation project is a discrete and incremental project that satisfies the eligibility criteria of materiality, need and prudence needed for ICM funding.

The BRT road relocation project is also the largest single road relocation project Elexicon has seen since 2014. It represents nearly 4% of Elexicon's planned net capital expenditures for 2022. The size, scale and complexity of this project makes it a strong candidate for an ICM. In the absence of incremental funding, it limits Elexicon's ability to invest in unforecasted road relocation projects that are non-discretionary. Further, it forces Elexicon to divert funding from other categories.



In addition to ongoing capital expenditure in other categories, Elexicon has absorbed a major incremental project, the new Belleville operations centre. The Belleville Operations Centre was required as the current lease on Elexicon's existing building in Belleville is expiring and the owner, the City of Belleville, now requires that location for its operations and is unable to extend the lease. It is not sustainable for Elexicon to continue absorbing material incremental costs into base rates without negatively impacting Elexicon and its customers.

Since the DSP filing, the Metrolinx electrification project has been deferred to 2022, materially increasing the volume of road relocation projects in 2022. Table 2 below shows the updated forecast for 2022 Third-Party Infrastructure Development Requirements.

When Elexicon was formed in 2019, the OEB approved a ten-year rebasing deferral period from the closing of the merger transaction. Consequently, the rate plans for Veridian Connections Inc. ("Veridian") and Whitby Hydro Electric Corporation ("Whitby Hydro") would remain in effect until the end of the ten-year period. The most recent rebasing for Veridian and Whitby Hydro occurred in 2014 and 2010, respectively, and the next rebasing of electricity distribution rates is not until January 1, 2029.

At pages 196 and 206 of the DSP, historical and forecast gross expenditures for System Access drivers are provided. The 2021 Road Relocation projects were estimated to be \$23.1MM, with \$19.7MM paid for by customers. By removing these contributions, Elexicon is left with \$5.5MM gross and \$3.9MM net for 9 road relocation projects.

In comparison, BRT is a single system access project with a comparable net capital expenditure in 2022. Table 1 below shows a breakdown of Third-Party Infrastructure



Development Requirements, as presented in the DSP. The net expenditure in this category aligns with other years.

OEB Staff-11 Table 1: 2021-2022 Third-Party Infrastructure Development Requirements

	2021 (in \$MM)	2022 (in \$MM)
Third-Party Infrastructure Development Requirements - Gross	\$23.05	\$5.54
Metrolinx Electrification (100% funded with Capital Contributions) - Gross	\$17.54	\$5.24
Remainder of Third-Party Infrastructure Development Requirements - Gross	\$5.51	\$0.30
Capital Contributions	\$1.63	\$0.09
Remainder of Third-Party Infrastructure Development Requirements - Net	\$3.87	\$0.21

Since the DSP filing the Metrolinx Projects scheduled in 2021 have been deferred to 2022. Table 2 below shows the updated forecast for 2022 Third-Party Infrastructure Development Requirements.



OEB Staff-11 Table 2: Updated 2021-2022 Third-Party Infrastructure Development Requirements

	2021 (in \$MM)	2022 (in \$MM)
Third-Party Infrastructure Development Requirements - Gross	\$4.85	\$25.45
100% funded with Capital Contributions – Gross	\$0.12	\$19.5
Remainder of Third-Party Infrastructure Development Requirements - Gross	\$4.73	\$5.95
Capital Contributions	\$1.32	\$2.25
Remainder of Third-Party Infrastructure Development Requirements - Net	\$3.12	\$3.70



OEB STAFF – 12

Reference: Appendix B-1, page 13

Question:

The business case for the BRT relocation project notes that “the project start date, in-service date, and expenditure timing will be dictated by external requirements and are not known at this time.”

a) What is the current status/progress of this project?

Response:

Ellexicon Energy Inc. (“Ellexicon”) has issued a design package to the Region of Durham for review and approval. Once design is approved and customer contributions have been received by Ellexicon a detailed construction schedule will be put in place with the Region of Durham’s project manager to ensure the relocation work is completed in 2022.

In order to have confidence that a System Service project like BRT, which can potentially be impacted by factors beyond Ellexicon’s control, will commence on time and as per schedule, Ellexicon requires a financial commitment from the customer in the form of a purchase order (“PO”) to finalize design work and a written confirmation of the schedule. Ellexicon has received correspondence from the Region of Durham indicating that this project must be completed in 2022. On September 1st 2021, Ellexicon received a PO for this project from the Region of Durham.



b) Please confirm that this project will be in-service in 2022 and provide the estimated in-service date.

Response:

Elexicon is scheduled to begin construction work on the BRT relocation project in July of 2022. It is expected to be completed by November 30th, 2022.



OEB STAFF – 13

**Reference: VRZ_2022 Rate Generator Model, tab 17
EB-2021-0015 Procedural Order No. 2**

Question:

In PO#2 the OEB noted that it may find it necessary to bifurcate the incentive ratemaking aspects of Ellexicon's application from the ICM funding requests.

a) Please provide a copy of an updated tariff sheet and rate generator model excluding the ICM-related components, in the event that the OEB ultimately finds it necessary to issue separate decisions on these matters.

Response:

A copy of an updated tariff sheet and IRM Rate Generator model excluding the ICM-related components are included as attachments to this response.

EE_VRZ_2022_IRM-Rate-Generator-Model_OEB Staff-13_20211108.xlsb

EE_VRZ_2022_Tariff of Rates and Charges_OEB Staff-13_20211108.pdf

Please see OEB Staff-25 which outlines all model updates made prior to removing the ICM-related components.



OEB STAFF – 14

Reference: VRZ 2022 ACM_ICM_Model, Tab 9

Question:

The ICM model shows the following Net Capital Expenditures for the Seaton TS:

Seaton TS - Land	New ICM	\$ 1,400,000
Seaton TS - Transformer	New ICM	\$ 23,388,885
Seaton TS - Switchgear	New ICM	\$ 1,811,302
Seaton TS - Station Equipment	New ICM	\$ 5,411,988
Seaton TS - Station Building	New ICM	\$ 8,749,825
Total		\$ 40,762,000

a) Did Elexicon include any consultation cost related to the Seaton TS station project in the above listed net capital expenditures?

Response:

Yes, consultation costs for Seaton TS are included in the Net Capital Expenditures table. Those costs are contained within the Seaton TS-Transformer line of the table and are eligible capital costs in accordance with IAS 16.16(b). The consultation costs are directly attributable to the Seaton TS project. Without the consultation with Indigenous Communities, Elexicon Energy Inc. (“Elexicon”) would not have met its necessary duty to consult obligations under the Class Environmental Assessment (“EA”) for Minor Transmission Facilities requirements or the Government of Ontario, Ministry of Heritage, Sport, Tourism and Culture Industries (“MHSTCI”) obligations on consulting archaeologists. In the absence of these consultations, Elexicon would not be able to construct Seaton TS.



Consultation efforts with external project stakeholders of the Seaton TS project began as part of this project. Consultation efforts included notification to: residents within 200m of the three potential TS sites: municipal and regional government staff, and First Nations communities, as identified to the Ministry of Energy. Stakeholders were invited to attend Public Information Centres (“PICs”) held by Elexicon, working in conjunction with Hydro One Networks Inc. (“HONI”). The purpose of the PICs was to address questions regarding the project and gather input provided by visitors that would inform consideration of the potential sites.

Consultation efforts with First Nations continued past the completion of the EA into Stage 3 and Stage 4 archaeology as well as Burial investigation work, as is required by MHSTCI *Standards and Guidelines for Consulting Archaeologists* (2011).

Elexicon’s consultant, WSP, was responsible for both the EA and completion of the additional archaeological investigations. WSP continued to have regular, informal discussions with First Nations representatives, both on-site monitors and with their communities, obtaining their feedback on the ongoing field work as well as gathering their input and comments on the multiple reports produced during the archaeological investigations at the TS site. The cost of consultations for both the stakeholder feedback and for the additional archaeological work are contained within overall process completion costs and not broken out. These costs are immaterial and were not tracked separately.

Not only were the First Nations communities consulted through the process, but they were also offered the opportunity to provide field monitors for the archaeological work undertaken on the Seaton TS project. These monitors were paid for their time and expenses and were able to participate in the work. They provided direct feedback to their communities on the progress of the work, as well as relaying community feedback to the archaeologists, onsite.



This was an invaluable opportunity for Elexicon to work directly with First Nation community members. Elexicon observes that it is a best practice to engage First Nations communities on archaeological projects throughout southern Ontario. Further, many First Nations communities have built capacity to provide representatives to conduct this type of engagement. Costs for the field monitoring provided by First Nations communities were captured separately and are indicated in Elexicon's answer to part b), below.

b) If so, please provide the total capitalized cost for consultation, as well as segmented by key cost drivers.

Response:

Capitalized costs for consultation related work are compiled in the following table. The table identifies the type of consultation work being either:

1. **Discussion** - Communications from Elexicon's consultant, WSP, by email, mail, telephone to external project stakeholders
2. **Monitoring** - Costs for provision of field monitors by First Nations communities to the Seaton TS project. Only a subset of all of the First Nations communities consulted were able to send monitors to participate in the project. A number of communities were impacted by various factors that prevented them from being able to supply monitors to the Seaton TS project. Monitoring Costs were tracked separately from the WSP scope of work and are identified in the following table.



Staff-14 Table 1- Capitalized Consultation Costs

Type of Consultation	Related to phase of work	Key Cost Driver of Consultation	Location of spending in Net Capital Expenditures Table	Cost (\$MM)
Discussion	Class EA	Class EA requirement	Seaton TS-Transformer line	Included in overall WSP scope and costs not broken out
Monitoring	Class EA-Stage 2 Archaeology	Consultation Best Practice	Seaton TS-Transformer line	\$0.011
Discussion with First Nations	Stage 3 Archaeology	Archaeological standards requirement	Seaton TS-Transformer line	Included in overall WSP scope and costs not broken out
Monitoring	Stage 3 Archaeology	Consultation Best Practice	Seaton TS-Transformer line	\$0.16
Discussion with First Nations	Stage 4 Archaeology & Burial Investigation	Archaeological standards requirement	Seaton TS-Transformer line	Included in overall WSP scope and costs not broken out
Monitoring	Stage 4 Archaeology & Burial Investigation	Consultation Best Practice	Seaton TS-Transformer line	\$0.445
Total:				\$0.62MM



OEB STAFF – 15

Reference: DSP, Appendix S-1, page 27

Question:

On page 27 of S-1 of the DSP, Elexicon noted that the environmental assessment is being done externally. OEB staff notes that an Environmental Study Report, dated August 2018, has been posted on Elexicon's [website](#).

a) Please confirm that the environmental assessment study has been completed.

Response:

Elexicon confirms that the environmental assessment study for the complete Seaton project including the transmission supply line from Hydro One and for the station site has been completed.

b) If so, please file the Notice of Completion on the record of this proceeding.

Response:

The Statement of Completion, with appendices, was filed with the Ministry of the Environment on August 17, 2018 and is included as attachments to this response.



2018-08-17

Director, Environmental Assessment and Permissions Branch
Ministry of the Environment, Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto ON M4V

**Subject: Statement of Completion, Veridian Connections and Hydro One Networks Seaton
MTS #1 Class Environmental Assessment**

Dear Director:

Veridian Connections (Veridian) and Hydro One Networks Inc. (Hydro One), as co-proponents, undertook a Class Environmental Assessment (EA) for the construction of a new Municipal Transformer Station (MTS) and its associated connection to Hydro One's transmission system in the City of Pickering in proximity to the proposed Seaton Community.

The proposed Project is subject to the Class Environmental Assessment for Minor Transmission Facilities (Class EA; Ontario Hydro, 1992) in accordance with *the Ontario Environmental Assessment Act* (EA Act).

A draft Environmental Study Report (ESR) was made available for public review and comment for 30 calendar days, from November 16, 2017 until December 15.

Comments received from municipal, provincial and federal government officials, government agencies, First Nations communities, potentially affected and interested persons and interest groups were addressed and are documented in this ESR as required by the Class EA process. No Part II Order requests were received.

A "Statement of Completion Electricity Projects" from each co-proponent is attached.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Roberts', with a long horizontal flourish extending to the right.

Andrew Roberts
Team Leader, Approvals and
Permitting

cc: Emilee O'Leary, Technical Support Section, Central Region, Ministry of the Environment Conservation, and Parks

Encl.

WSP ref.: 151-02610-00

100 Commerce Valley Drive West
Thornhill, ON
Canada L3T 0A1

T: +1 905 882-1100
F: +1 905 882-0055
wsp.com

**Statement of Completion
Electricity Projects**

For Office Use Only		
Reference Number	Date (yyyy/mm/dd)	Initials

General Information and Instructions
General

The information provided on this form is collected under authority of the Ministry of the Environment and Climate Change Environmental Screening Process for electricity projects.

Instructions

- Questions regarding the completion and submission of this form should be directed to Customer Services and Outreach Unit at the Client Services and Permissions Branch (416-314-8001 or 1-800-461-6290).
- Please send the completed form to:
 Ministry of the Environment and Climate Change
 Director, Environmental Assessment and Permissions Branch
 135 St. Clair Avenue West, 1st Floor
 Toronto ON M4V 1P5
 Fax: 416-314-8452

Proponent Information

Proponent Name (legal name of organization)

Hydro One Networks Inc. (Co-proponent)

Contact Person

Last Name

Radinovic

First Name

Olivera

Middle Initial

Telephone Number

416 345-6598 ext.

Fax Number

416 345-6919

Email Address

olivera.radinovic@hydroone.com

Proponent Type

- ☐ Municipal
 ☐ Provincial
 ☐ Crown Corporation
 ☐ Federal
 ☐ Private Sector
- ☒ Other (describe) ► **Transmission and Distribution Company**

Proponent Mailing Address

Civic Address

Unit Number

Street Number

483

Street Name

Bay Street

PO Box

Delivery Designator

- ☐ Rural Route
 ☐ Suburban Service
 ☐ Mobile Route
 ☐ General Delivery
 ☐ N/A

Delivery Identifier

Municipality/Unorganized Township

Toronto

Province

Ontario

Country

Canada

Postal Code

M5G 2P5

Site Address☐ Civic Address☒ Survey Address

Lot See attached map.	Concession	Part	Reference Plan
Municipality/Unorganized Township	Province	Country	Postal Code

Geo Reference (Non Address Information)

Description	Map Datum	Zone	Accuracy Estimate	Geo-Referencing Method	UTM Easting	UTM Northing
Southwest corner of property	NAD83	15	+/-5m	Estimate	651854	4860299
Physical location of front door						

Project Information

Project Name

[Seaton MTS #1](#)

Nameplate Capacity of Facility (in megawatts)

[N/A 230kV substation](#)

Power Source or Fuel Type

☐ Wind ☐ Water (hydroelectric) ☐ Natural gas ☐ Biomass ☐ Landfill gas ☐ Waste biomass ☐ Oil ☐ Coal☐ Municipal solid waste☐ Hazardous waste☐ Liquid industrial waste☒ Other (describe) [► Electricity from the existing provincial grid](#)

Brief Project Description

[Construct a new 230kV to 27.6kV transformer substation; connect it to the grid using a line tap connection \(0.2 km long\); upgrade a 1.4 km length of 230kV transmission line from one circuit to a double circuit.](#)

Was a Screening Report prepared?

☐ Yes ☒ No

Was an Environmental Review Report prepared?

☒ Yes ☐ No

Was an Equivalent Review Report prepared?

☐ Yes ☒ No**Availability of Documentation**☐ Same as Site Address

Proponents are required to retain, either on site or in another location where they will be readily available, any Screening Report, Environmental Review Report, Equivalent Review Report, Addendum, and related notices and Statements of Completion prepared under the Environmental Screening Process, as well as documentation of any commitments made by the proponent to address concerns after one of the above-noted reports was prepared.

☒ Civic Address

Unit Number	Street Number 483	Street Name Bay Street	PO Box
Municipality/Unorganized Township	Province Toronto	Country Ontario	Postal Code M5G 2P5

☐ Survey Address

Geo Reference (Non Address Information)

Description	Map Datum	Zone	Accuracy Estimate	Geo-Referencing Method	UTM Easting	UTM Northing
Southwest corner of property						
Physical location of front door						

Contact Information about project documentation

Contact Person

Last Name

Radinovic

First Name

Olivera

Middle Initial

Telephone Number

416 345-6598 ext.

Email Address

olivera.radinovic@hydroone.com

Website containing project documentation

<https://www.hydroone.com/about/corporate-infr>**Elevation Requests**

Were any Elevation Requests Received?

☐ Yes☒ No

If Yes, how were they resolved?

Statement of Proponent

I, the undersigned hereby declare that, to the best of my knowledge, the information contained in this statement is complete and accurate in every way, and I have complied with the Environmental Screening Process established under *the Environmental Assessment Act* of Ontario in the environmental review of the above-noted project.

Name

Olivera Radinovic

Title

Environmental Planner

Signature



Date (yyyy/mm/dd)

2018/07/31

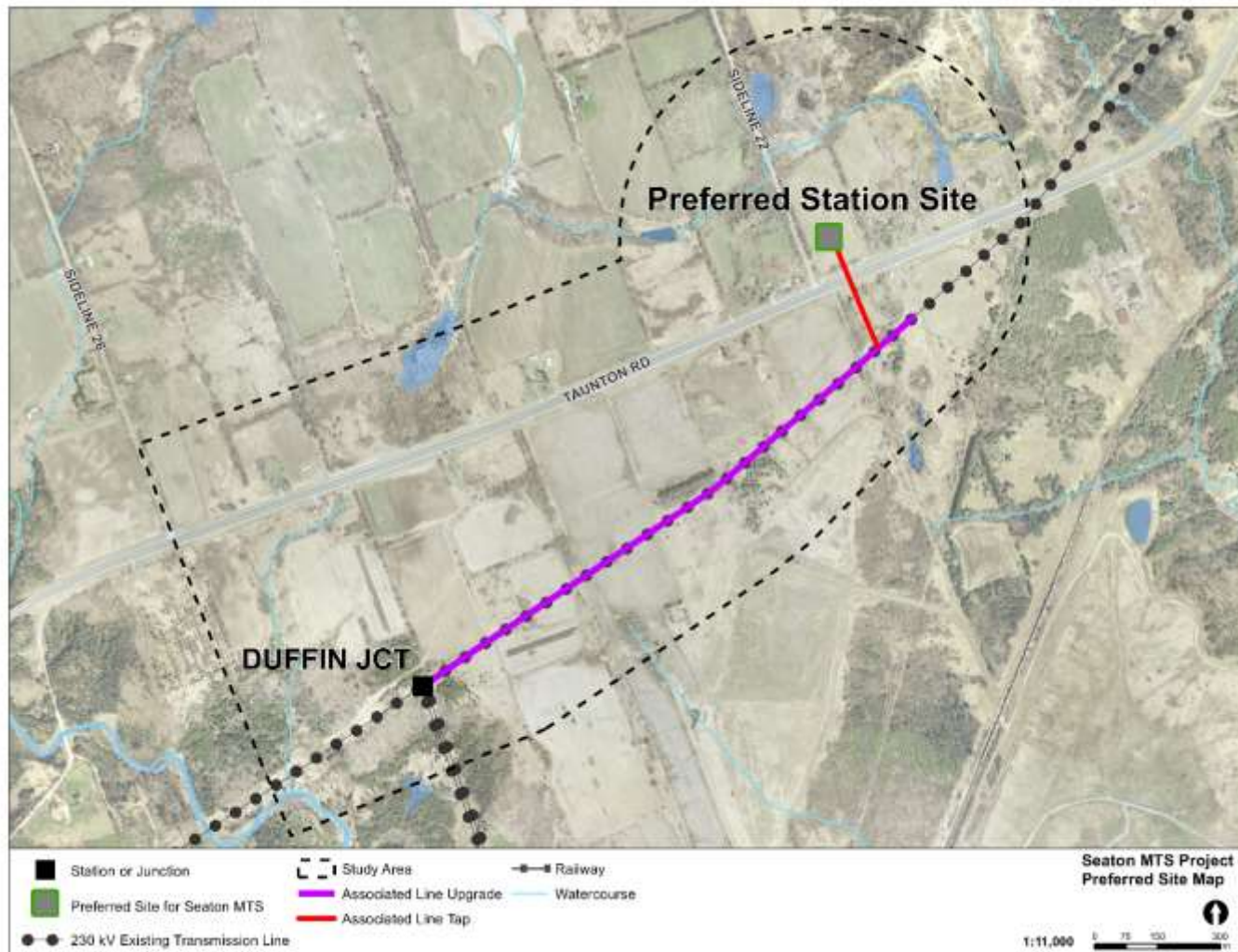


Figure 5-3: Site #2, Station and New Line Tap Configuration

Statement of Completion Electricity Projects

For Office Use Only		
Reference Number	Date (yyyy/mm/dd)	Initials

General Information and Instructions

General

The information provided on this form is collected under authority of the Ministry of the Environment and Climate Change Environmental Screening Process for electricity projects.

Instructions

- Questions regarding the completion and submission of this form should be directed to Customer Services and Outreach Unit at the Client Services and Permissions Branch (416-314-8001 or 1-800-461-6290).
- Please send the completed form to:
 Ministry of the Environment and Climate Change
 Director, Environmental Assessment and Permissions Branch
 135 St. Clair Avenue West, 1st Floor
 Toronto ON M4V 1P5
 Fax: 416-314-8452

Proponent Information

Proponent Name (legal name of organization)

Veridian Connections (Co-proponent)

Contact Person

Last Name

Smith

First Name

Craig

Middle Initial

Telephone Number

905 427-9870 ext. 2236

Fax Number

905 619-0210

Email Address

csmith@veridian.on.ca

Proponent Type

☐ Municipal

☐ Provincial

☐ Crown Corporation

☐ Federal

☐ Private Sector

☒ Other (describe) ► **Local Distribution Company**

Proponent Mailing Address

Civic Address

Unit Number

Street Number

55

Street Name

Taunton Road East

PO Box

Delivery Designator

☐ Rural Route

☐ Suburban Service

☐ Mobile Route

☐ General Delivery

☐ N/A

Delivery Identifier

Municipality/Unorganized Township

Ajax

Province

Ontario

Country

Canada

Postal Code

L1T 3V3

Site Address☐ Civic Address☒ Survey Address

Lot See attached map	Concession	Part	Reference Plan
Municipality/Unorganized Township	Province	Country	Postal Code

Geo Reference (Non Address Information)

Description	Map Datum	Zone	Accuracy Estimate	Geo-Referencing Method	UTM Easting	UTM Northing
Southwest corner of property	NAD83	15	+/-5m	Estimate	651854	4860299
Physical location of front door						

Project Information

Project Name

[Seaton MTS #1](#)

Nameplate Capacity of Facility (in megawatts)

[N/A 230kV substation](#)

Power Source or Fuel Type

- ☐ Wind ☐ Water (hydroelectric) ☐ Natural gas ☐ Biomass ☐ Landfill gas ☐ Waste biomass ☐ Oil ☐ Coal
- ☐ Municipal solid waste ☐ Hazardous waste ☐ Liquid industrial waste
- ☒ Other (describe) ► [Electricity from the existing provincial grid](#)

Brief Project Description

[Construct a new 230kV to 27.6kV transformer substation; connect it to the grid using a line tap connection \(0.2 km long\); upgrade a 1.4 km length of 230kV transmission line from one circuit to a double circuit.](#)

Was a Screening Report prepared?

☐ Yes ☒ No

Was an Environmental Review Report prepared?

☒ Yes ☐ No

Was an Equivalent Review Report prepared?

☐ Yes ☒ No**Availability of Documentation**☐ Same as Site Address

Proponents are required to retain, either on site or in another location where they will be readily available, any Screening Report, Environmental Review Report, Equivalent Review Report, Addendum, and related notices and Statements of Completion prepared under the Environmental Screening Process, as well as documentation of any commitments made by the proponent to address concerns after one of the above-noted reports was prepared.

☒ Civic Address

Unit Number	Street Number 55	Street Name Taunton Road East	PO Box
Municipality/Unorganized Township Pickering	Province Ontario	Country Canada	Postal Code L1T 3V3

☐ Survey Address

Geo Reference (Non Address Information)

Description	Map Datum	Zone	Accuracy Estimate	Geo-Referencing Method	UTM Easting	UTM Northing
Southwest corner of property						
Physical location of front door						

Contact Information about project documentation

Contact Person

Last Name

Smith

First Name

Craig

Middle Initial

Telephone Number

905 427-9870 ext. 2236

Email Address

Website containing project documentation

<http://www.veridian.on.ca/ea-study-seaton/>**Elevation Requests**

Were any Elevation Requests Received?

☐ Yes☒ No

If Yes, how were they resolved?

Statement of Proponent

I, the undersigned hereby declare that, to the best of my knowledge, the information contained in this statement is complete and accurate in every way, and I have complied with the Environmental Screening Process established under the *Environmental Assessment Act* of Ontario in the environmental review of the above-noted project.

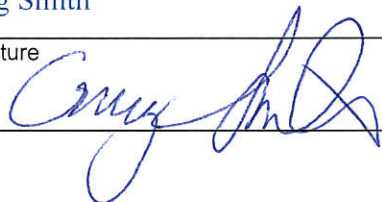
Name

Craig Smith

Title

Manager

Signature



Date (yyyy/mm/dd)

2018/08/07

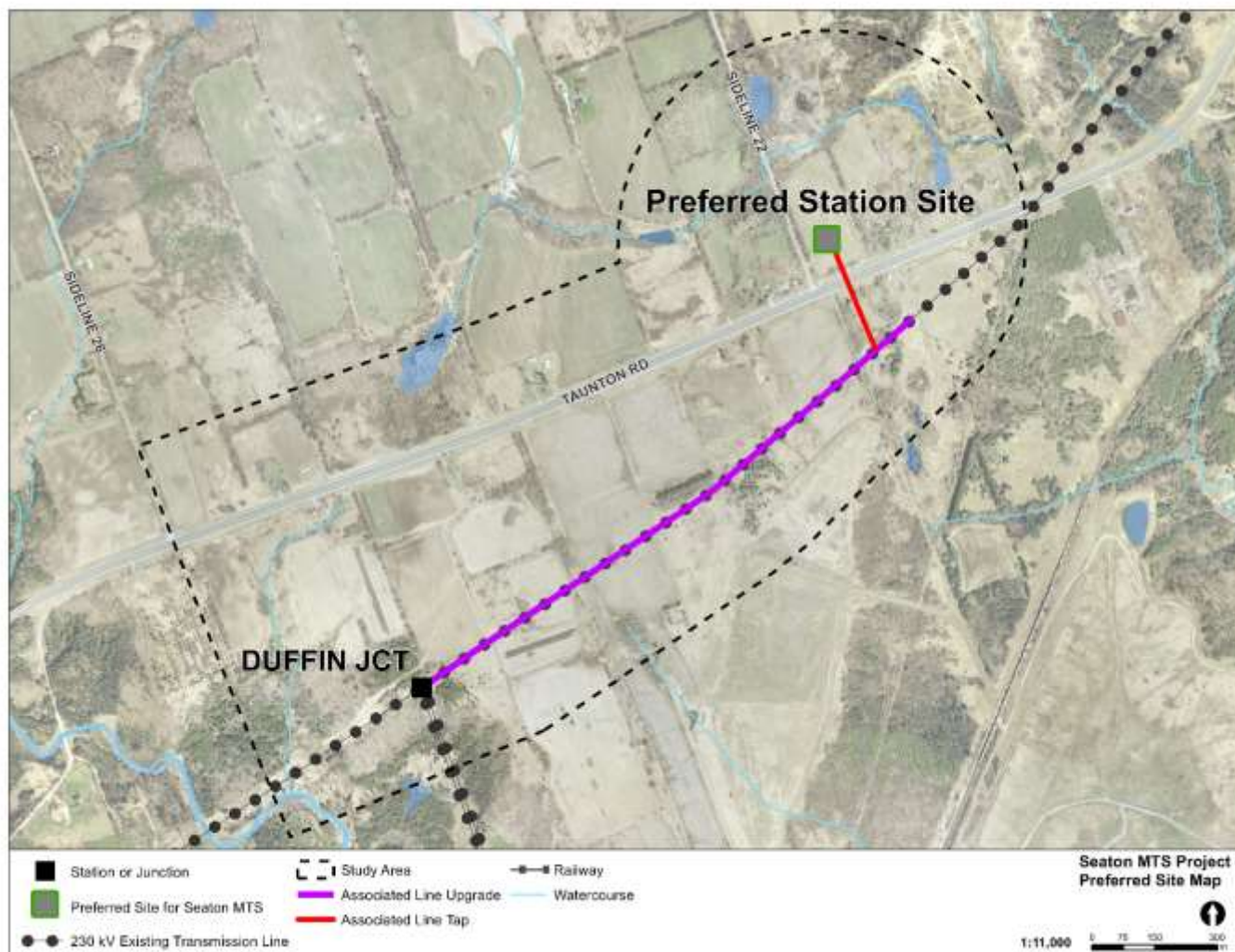


Figure 5-3: Site #2, Station and New Line Tap Configuration



OEB STAFF – 16

Reference: VRZ Rate Generator Model, tab 6 Class A Consumption Date

Preamble:

OEB staff notes that Elexicon reversed the transition period between Class A and Class B customer, since O. Reg. 429/04 stipulates that customers can only transition between Class A and Class B on July 1 of each year.

Transition Customers - Non-loss Adjusted Billing Determinants by Customer								
Customer	Rate Class		2020		2019		2018	
			July to December	January to June	July to December	January to June	July to December	January to June
Customer 1	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh					4,140,807	668,073
		kW					8,448	1,800
		Class A/B	B	A	A	A	A	B
Customer 2	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	644,566	360,839	3,065,688	403,115	5,535,051	5,616,611
		kW	1,181	704	7,335	785	14,841	11,928
		Class A/B	B	B	B	B	A	B
Customer 3	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	1,846,859	1,956,472	2,004,350	1,740,657	2,029,510	2,104,751
		kW	4,554	5,197	4,804	4,438	4,706	5,019
		Class A/B	B	A	A	B	A	A
Customer 4	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	1,439,117	1,685,391	1,360,363	1,658,129	1,027,459	1,508,597
		kW	3,104	3,318	2,926	3,441	2,274	3,173
		Class A/B	B	A	A	B	A	A
Customer 5	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	2,887,883	4,091,027	2,819,219	3,329,422	2,947,399	4,087,973
		kW	5,793	7,626	5,316	7,743	5,882	7,900
		Class A/B	A	A	A	A	B	A
Customer 6	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	2,767,223	2,720,301	4,290,880	3,140,661	4,765,139	4,363,831
		kW	6,636	6,338	9,100	7,511	9,004	8,749
		Class A/B	A	A	A	A	B	A
Customer 7	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	3,606,138	3,653,252	3,022,932	3,875,861	2,323,364	2,323,492
		kW	7,699	7,753	6,300	8,008	5,192	6,317
		Class A/B	A	A	A	A	B	A
Customer 8	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	2,456,780	2,192,968	2,178,108	2,298,968	2,032,284	2,059,400
		kW	5,678	5,402	4,344	5,640	3,557	3,709
		Class A/B	A	A	A	A	B	A
Customer 9	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	3,187,159	3,289,726	3,197,072	3,361,416	3,121,433	3,285,061
		kW	5,401	5,519	5,445	5,610	5,333	5,563
		Class A/B	A	A	B	A	B	B
Customer 10	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	6,068,309	6,712,634	5,380,559	5,520,614	5,006,530	5,585,191
		kW	12,923	14,089	11,871	12,567	10,599	12,111
		Class A/B	A	A	B	A	B	B
Customer 11	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	648,017	752,372	821,063	788,716	761,354	752,890
		kW	1,289	1,434	1,559	1,459	1,537	1,469
		Class A/B	A	A	B	A	B	B
Customer 12	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	627,963	621,501	1,182,245	776,655	1,125,853	1,056,558
		kW	5,221	5,019	5,705	5,400	5,422	5,706
		Class A/B	A	A	B	A	B	B
Customer 13	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	190,256	214,789	217,243	233,474	223,006	228,443
		kW	1,039	1,161	1,154	1,119	1,305	1,220
		Class A/B	A	A	B	A	B	B
Customer 14	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	1,500,427	1,172,942	1,730,943	1,973,697	1,923,736	1,947,272
		kW	3,243	2,854	3,580	4,268	4,098	4,132
		Class A/B	B	A	B	B	B	B
Customer 15	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	1,394,413	1,427,327	1,829,038	2,142,753	1,923,078	2,309,202
		kW	2,582	2,983	3,657	3,615	3,755	3,939
		Class A/B	B	A	B	B	B	B
Customer 16	GENERAL SERVICE 50 TO 2,399 KW SERVICE CLASSIFIC	kWh	1,100,657	1,286,211	1,116,358	1,487,343	-	-
		kW	2,843	3,202	3,356	3,861	-	-
		Class A/B	B	A	B	B	-	-



Question:

- a) Please review the transition period for each of the 16 customers listed and confirm that the transition period has been reversed.**

Response:

Elexicon Energy Inc. (“Elexicon”) confirms that the transition period has been reversed.

- b) Please confirm that the aggregated consumption date on tab 6.1a is correctly allocated despite this reversal.**

Response:

Elexicon confirms that the reversal of the transition period identified in (a) does not affect the aggregated consumption data on tab 6.1a. For clarity, the allocation of the GA balance between transitioning customers and Class B customer is unchanged. To avoid any confusion and ensure accuracy of the record, the consumption data on tab 6.1a has been correctly restated in the updated VRZ IRM Rate Generator model provided with Elexicon’s interrogatory responses to OEB Staff:

EE_VRZ_2022_IRM-Rate-Generator-Model_OEB Staff-25_20211108.xlsx

OEB Staff-25 includes an overview of all models changes.



OEB STAFF – 17

Reference: Manager's Summary, page 8, August 18, 2021

Question:

At Reference #1, Elexicon included a table summarizing its request to clear 2018, 2019, and 2020 Group 1 deferral and variance account (DVA) balances for the VRZ and no disposition request to clear any DVA balances for the WRZ. However, Elexicon has not stated whether it is requesting final or interim disposition of its Group 1 DVAs for the VRZ.

a) Please clarify whether Elexicon is seeking final or interim disposition of its Group 1 DVAs for the VRZ in the current proceeding.

Response:

Elexicon Energy Inc. ("Elexicon") is requesting an interim disposition of its Group 1 DVAs for the VRZ in the current proceeding. Elexicon is currently undertaking a final review of the settlement and accounting for Accounts 1588 and 1589 prior to requesting a final disposition of these balances.



OEB STAFF – 18

Reference:

- (1) *Filing Requirements For Electricity Distribution Rate Applications - 2021 Edition for 2022 Rate Applications - Chapter 3 Incentive Rate-Setting Applications, June 24, 2021, page 12 & 13***
- (2) *Manager's Summary, page 21, August 18, 2021***

Preamble:

OEB staff notes that Elexicon's 2018 and 2019 balances for the VRZ were not disposed in previous proceedings as the threshold test was not met and Elexicon did not request disposition.

At Reference #1, the OEB set out its expectations for final disposition requests of commodity pass-through account balances when there has been no disposition requested in prior years due to the threshold test. The OEB further stated:

If these distributors have now reviewed these balances in the context of the Accounting Guidance and are confident that there are no systemic issues with their RPP settlement and related accounting processes, such distributors may explain those circumstances and request final disposition of these account balances. If these distributors identified errors or discrepancies that materially affect the ending account balances, distributors should adjust their account balances prior to requesting final disposition.

At Reference #2, Elexicon stated that regarding the VRZ, it outlined in its 2021 VRZ rate application (EB-2020-0013) that it completed the modifications necessary to ensure compliance with the accounting guidance, highlighting some changes made in calendar 2019 and 2020. Elexicon indicated that for the VRZ it is now completely aligned with the OEB Accounting Guidance.

Question:

- a) Please confirm that Elexicon is confident that regarding the VRZ there are no systemic issues with its RPP settlement and related accounting processes regarding its 2018 and forward balances.**



b) If this is not the case, please explain.

Response (a) and (b):

As indicated in OEB Staff-17, Elexicon Energy Inc. (“Elexicon”) is requesting an interim disposition of Group 1 DVA balances for the Veridian Rate Zone (“VRZ”) in the current proceeding. Elexicon does not believe that there are material systemic issues that have not already been identified, however, will complete a final review prior to requesting a final disposition for the VRZ.

c) Please confirm that no errors or discrepancies were identified that materially affect the ending account balances.

d) If this is not the case, please explain.

Response (c) and (d):

Elexicon has identified an issue related to the levels of unaccounted for energy used for VRZ settlement in 2020. An estimated adjustment for the impact was included as a placeholder in the VRZ IRM Rate Generator continuity schedule (1588 principal adjustments for VRZ in 2020) as well as the VRZ GA Analysis Workform filed in August 2021.

To review and address the issue, Elexicon was able to re-run metering data used in the 2020 settlement process (January to December), and re-calculate settlement and the resulting accounting entries. Elexicon provides summary tables (below) outlining the impact of the revised calculations and the associated revisions to principal adjustments required in the VRZ IRM Rate Generator continuity and related sections in the VRZ GA Analysis Workform model.



To ensure the most accurate and up-to-date balances are included in the interim disposition request for VRZ's Group 1 balances, the following updated spreadsheets have been filed with these interrogatory responses:

- VRZ Accounting Guidance 2020 Analysis
EE_VRZ_2022_Acctg Guidance 2020 Analysis_OEB Staff-25_20211108.xlsx
- VRZ IRM Rate Generator
EE_VRZ_2022_IRM-Rate-Generator-Model_OEB Staff-25_20211108.xlsm
- VRZ GA Analysis Workform
EE_VRZ_2022_GA Analysis Workform_OEB Staff-25_20211108.xlsm

Please see OEB Staff-25 which provides an overview of revisions that have been included in these models.

The issue identified which relates to the unaccounted for energy is not expected to materially impact the 2019 principal adjustment amounts for Account 1588 and 1589, however, Elexicon will be reviewing further prior to requesting a final disposition for VRZ's Group 1 balances. An update will be provided in the 2023 rate application. Elexicon does not believe there are any other errors or discrepancies that would result in a material impact to the ending Group 1 balances for VRZ.



OEB Staff-18 Table 1: Summary of Updates to 2020 Regulatory Accounting Guidance Analysis – Impacts to Account 1588 Power

A. Impacts to Account 1588 Power:

					GA Workform Updates	
Description	Revised	Original	Difference	Principal Adjustments	Tab	Cell
Updates to reflect additional metering data	718,831	599,031	119,800	Split of CT 148 GA Costs (4705 Power and 4707 GA)	Principal Adjustments	V105
1) (reduced levels of UFE and improved revenue and rates used for settlement)	38,577	(468,836)	507,413	Revised CT 1142 Settlement amounts	Principal Adjustments	V106
	(987,912)	(697,058)	(290,854)	Revised unbilled estimate to actual revenue differences	Principal Adjustments	V107
2) Identified large billing adjustment	(199,470)	-	(199,470)	New - 2020 consumption billed in 2021	Principal Adjustments	V108
Total 2020 Principal Adjustments - Current Year	(429,974)	(566,863)	136,889			

Summary of 2020 Principal Adjustments	Revised	Original	Difference	Rate Generator Updates		GA Workform Updates	
Principal Adjustment - Prior Year Reversals	677,864	677,864	-	Tab	Cell	Tab	Cell
Principal Adjustment - Current Year	(429,974)	(566,863)	136,889				
Principal Adjustments 2020 Summary	247,890	111,001	136,889	3. Continuity Schedule	BF28	Account 1588	D19

Account 1588	Revised	Original	Difference
Principal Transactions	307,491	307,491	-
Principal Adjustments 2020 Summary	247,890	111,001	136,889
Total 2020 Principal	555,381	418,492	136,889
Total 2019 Principal	(270,752)	(270,752)	-
Total 2018 Principal	(94,331)	(94,331)	-
Total Account 1588 Power - Principal Balance	190,298	53,409	136,889

OEB Staff-18 Table 2: Summary of Updates to 2020 Regulatory Accounting Guidance Analysis – Impacts to Account 1589 Global Adjustment

B. Impacts to Account 1589 Global Adjustment:

					GA Workform Updates	
Description	Revised	Original	Difference	Principal Adjustments	Tab	Cell
Updates to reflect additional metering data	(718,831)	(599,031)	(119,800)	Split of CT 148 GA Costs (4705 Power and 4707 GA)	GA 2020	C77
1) (reduced levels of UFE and improved revenue and rates used for settlement)	341,238	341,238	-	Unbilled estimate to actual revenue differences	Principal Adjustments	J105
					No update required	
Total 2020 Principal Adjustments - Current Year	(377,593)	(257,793)				

Summary of 2020 Principal Adjustments	Revised	Original	Difference	Rate Generator Updates	
Principal Adjustment - Prior Year Reversals	1,067,310	1,067,310	-	Tab	Cell
Principal Adjustment - Current Year	(377,593)	(257,793)	(119,800)		
Principal Adjustments 2020 Summary	689,717	809,517	(119,800)	3. Continuity Schedule	BF29

Account 1589	Revised	Original	Difference
Principal Transactions	(185,842)	(185,842)	-
Principal Adjustments 2020 Summary	689,717	809,517	(119,800)
Total 2020 Principal	503,875	623,675	(119,800)
Total 2019 Principal	1,441,870	1,441,870	-
Total 2018 Principal	(1,172,340)	(1,172,340)	-
Total Account 1588 Power - Principal Balance	773,405	893,205	(119,800)



OEB STAFF – 19

**Reference: (1) Manager’s Summary, page 8, August 18, 2021
(2) Manager’s Summary, page 26, August 18, 2021**

Preamble:

At Reference #1, Elexicon is requesting an extension request for the WRZ. This extension request is with respect to the implementation of the OEB’s Accounting Guidance related to Accounts 1588 and 1589. Elexicon stated that the extension will support additional process changes delayed by the COVID-19 emergency and unexpected upgrades related to the recently merged CIS.

At Reference #2, Elexicon noted that additional planning is in place to support the continued transition to a consistent settlement process and tool for the WRZ which mirrors the VRZ. Elexicon further stated that while this transition will not have a material effect on the outcome of the settlement amounts, it will assist to align to the timing expectations for settlement and true-ups as outlined in the OEB’s regulatory accounting guidance. Elexicon also noted that it will also provide for greater consistency between both of the rate zones’ processes.

Question:

a) Please confirm that if the OEB grants Elexicon’s request regarding the implementation of the OEB’s Accounting Guidance for Accounts 1588 and 1589 for the WRZ, there will be no material impact on WRZ’s Group 1 DVA balances that have not yet been disposed on a final basis (i.e., 2020 balances and forward).

Response:

Elexicon Energy Inc. (“Elexicon”) confirms that the granting of an extension request regarding the implementation of the OEB’s Accounting Guidance for Accounts 1588 and 1589 for the Whitby Rate Zone (“WRZ”) would not have a material impact on the WRZ’s Group 1 DVA balances (2020 and forward).



b) If this is not the case, please explain.

Response:

Not Applicable. See response to (a).

c) Please confirm whether Elexicon expects further adjustments to any of the DVAs for the WRZ upon the implementation of the new integrated CIS system. If so, please provide the details.

Response:

Elexicon confirms that it does not expect any further adjustments to any of the DVAs for the WRZ upon implementation of the new integrated CIS system.



OEB STAFF – 20

**Reference: (1) Manager's Summary, page 26, August 18, 2021
(2) Manager's Summary, page 27, August 18, 2021**

Preamble:

At Reference #1, Elexicon stated that regarding the WRZ, the finalization of true-ups under the old process must be completed and new processes set up to support the updated processes going forward. Elexicon further noted that the transition will require additional time and Elexicon plans to complete this by the end of 2021 to allow for implementation of the new process at the beginning of 2022.

At Reference #2, Elexicon stated that the WRZ's outcomes continue to be fully aligned with the OEB's Accounting Guidance. Elexicon further stated that the remaining changes to align processes and improve the timing of true-ups will require additional time and effort and will follow the major CIS upgrades in 2021.

Elexicon requested that the OEB approve an extension to complete this transition by the end of 2021. Elexicon noted that the extension will not impact customers, nor the outcome of account balances reviewed for disposition. Elexicon noted that it is a strictly a process driven change mandated by the OEB decision (EB-2019-0130) which results in a standard process with some accelerated timing.

Question:

a) Please confirm that Elexicon remains on track to complete WRZ's above noted transition by the end of 2021, in order to allow for implementation of the new process at the beginning of 2022.

Response:

Elexicon Energy Inc. ("Elexicon") continues to work on the transition plan, however, currently expects that additional time will be required.



b) If this is not the case, please explain.

Response:

As part of transition planning, Elexicon has identified the importance of stabilizing a number of key elements prior to the transition:

- Completion of major CIS upgrades and sufficient time to address any follow-up requirements for that project.
- Resources - A settlement resource has recently accepted a new role in a different department, creating a vacancy. Elexicon would like to ensure the settlement position is filled and training completed.
- Complete the final review of the Veridian Rate Zone ("VRZ") Account 1588 and 1589 balances for final disposition.

The transition is planned in 2022 with an expectation of completion by the end of June. Elexicon respectfully requests the OEB approve an extension until June 2022.

c) Please explain if Elexicon is granted the extension by the OEB, there will be either no impact on the Group 1 DVA balances or an immaterial impact on the Group 1 DVA balances.

Response:

Elexicon confirms that an extension would not cause any impact on the Whitby Rate Zone ("WRZ") Group 1 DVA balances or that any impact will be immaterial. Please see response to Staff-19 (a) and (c).



OEB STAFF – 21

Reference:

- (1) EE_VRZ_2022_Acctg Guidance 2020 Analysis_full year_20210818.xlsx
- (2) VRZ, IRM Rate Generator Model, August 18, 2021
- (3) Manager's Summary, page 21, Table 8, August 18, 2021

Preamble:

At Reference #1, the 2020 "balance per DVA Continuity Schedule" for Accounts 1588 and 1589 as shown in cells E31 and E43 of tab "Final RSVA Balances" are different than that shown in the DVA Continuity Schedule, at Reference #2. The differences are as follows in OEB Staff Table 1:

OEB Staff Table 1 – VRZ Difference between Accounting Guidance and DVA Continuity Schedule

	Account 1588			Account 1589		
	Transactions	Principal Adjustments	Total	Transactions	Principal Adjustments	Total
Accounting Guidance 2020 Analysis			446,489			595,383
DVA Continuity Schedule (sum of 2020 transactions and principal adjustments)	307,491	111,001	418,491	(185,842)	809,517	623,675
Difference			27,998			(28,292)

At Reference #3, Elexicon indicated that for the VRZ it is now completely aligned with the OEB Accounting Guidance.

Question:

- a) Does Elexicon agree with the values shown in OEB Staff Table 1? If Elexicon disagrees, please update the table accordingly.

Response:

Elexicon agrees with the values shown in OEB Staff Table 1, however, Elexicon has provided updates through the interrogatory process which includes updates to both the VRZ Accounting Guidance 2020 Analysis and the VRZ IRM Rate Generator model



(continuity schedule). Further details are outlined in OEB Staff-18 and OEB Staff-25. Elexicon has provided a revised Table below which reflects the updates made to the application.

OEB Staff-21 Table 1: Revised Table – VRZ Difference between Accounting Guidance and DVA Continuity Schedule

	Account 1588				Account 1589		
	Transactions	Principal Adjustments	Total		Transactions	Principal Adjustments	Total
Accounting Guidance 2020 Analysis (20211108 updates)			601,860				482,125
DVA Continuity Schedule (sum of 2020 transactions and principal adjustments (20211108 updates))	307,491	247,890	555,381	-	185,842	689,717	503,875
Difference			46,479				- 21,750

b) Although the differences in OEB Staff Table 1 may be immaterial, please explain why there are any differences at all, given that Elexicon noted that it is completely aligned with the OEB Accounting Guidance for the VRZ.

Response:

Differences in the revised Table provided in (a) are immaterial. Small differences may be explained by transactions (such as billing adjustments) or differences due to methodology (i.e. proration of consumption in the billing system). The regulatory accounting guidance analysis has been consolidated and reviewed on an annualized basis. The review demonstrates that these types of differences are not considered material enough to review at a more detailed level.



- c) Please explain why there are some principal adjustment true-ups for the VRZ, considering that Elexicon noted that it is completely aligned with the OEB Accounting Guidance for the VRZ.**

Response:

Principal adjustment true-ups reflect adjustments that are required due to timing differences. In general, not all information required for true-ups is available for posting in the current year. Billing adjustments may also occur outside of the year they relate to.

For VRZ, it was identified after the end of 2020, that there was an issue related to unaccounted for energy which required corrections to the settlement calculations and related accounting entries (See OEB Staff-18 for additional detail). Any revisions (including true-ups) have been included as principal adjustments in 2020. This ensures that the balances reviewed for VRZ's Group 1 interim disposition request are as accurate and up-to-date as possible.

- d) Please confirm that the row "Accounting Guidance 2020 Analysis" in OEB Staff Table 1, is not intended to reflect the balances in the DVA Continuity Schedule which reflect the general ledger. Instead, it is intended to represent the balances as calculated using the OEB model from the February 21, 2019 accounting guidance. If this is not the case, please explain why there are differences between the two rows in OEB Staff Table 1.**

Response:

Elexicon confirms that the row "Accounting Guidance 2020 Analysis" in OEB Staff 1 and OEB Staff-21a -Table 1 tables are not intended to reflect the balances in the DVA Continuity Schedule, but are an analysis which reflects OEB accounting guidance for Accounts 1588 and 1589. See Response (b) for additional information.



OEB STAFF – 22

Reference:

- (1) EE_WRZ_2020_Acctg Guidance_2020 Analysis_20210818.xlsx
- (2) WRZ, IRM Rate Generator Model, August 18, 2021
- (3) Manager's Summary, page 21, Table 8, August 18, 2021

Preamble:

At Reference #1, the 2020 "balance per DVA Continuity Schedule" for Accounts 1588 and 1589 as shown in cells E30 and E42 of tab "Final RSVA Balances" are different than that shown in the DVA Continuity Schedule, at Reference #2. The differences are as follows in OEB Staff Table 2:

OEB Staff Table 2 – WRZ Difference between Accounting Guidance and DVA Continuity Schedule

	Account 1588			Account 1589		
	Transactions	Principal Adjustments	Total	Transactions	Principal Adjustments	Total
Accounting Guidance 2020 Analysis			(268,794)			20,715
DVA Continuity Schedule (sum of 2020 transactions and principal adjustments)	(103,312)	(137,108)	(240,420)	(306,810)	327,104	20,294
Difference			(28,374)			421

At Reference #3, Elexicon indicated that it is now completely aligned with the OEB Accounting Guidance for the WRZ, except for the timing of true-ups, which are addressed through principal adjustments in the DVA Continuity Schedule.

Question:

- a) Does Elexicon agree with the values shown in OEB Staff Table 2? If Elexicon disagrees, please update the table accordingly.

Response:

Elexicon Energy Inc. ("Elexicon") agrees with the values shown in OEB Staff Table 2.



- b) Although the differences in OEB Staff Table 2 may be immaterial, please explain whether these differences are due to the timing of true-ups for the WRZ, which are addressed through principal adjustments in the DVA Continuity Schedule. If this is not the case, please explain.**

Response:

Differences in OEB Staff Table 2 are immaterial. Small differences may be explained by transactions (such as billing adjustments) or differences due to methodology (i.e. proration of consumption in the billing system). The regulatory accounting guidance analysis has been consolidated and reviewed on an annualized basis. The review demonstrates that these types of differences are not considered material enough to review at a more detailed level.

- c) Please confirm that the row “Accounting Guidance 2020 Analysis” in OEB Staff Table 2, is not intended to reflect the balances in the DVA Continuity Schedule which reflect the general ledger. Instead, it is intended to represent the balances as calculated using the OEB model from the February 21, 2019 accounting guidance. If this is not the case, please explain.**

Response:

Ellexicon confirms that the row “Accounting Guidance 2020 Analysis” in OEB Staff Table 2 is not intended to reflect the balances in the DVA Continuity Schedule, but is an analysis which reflects OEB accounting guidance for Accounts 1588 and 1589. See Response (b) for additional information.



OEB STAFF – 23

Reference:

- (1) WRZ, GA Analysis Workform, August 18, 2021
- (2) VRZ, GA Analysis Workform, August 18, 2021
- (3) Veridian Connections Inc. RRR 2.1.7 filing, December 31, 2018 data
- (4) Ellexicon RRR 2.1.7 filing, December 31, 2019 and December 31, 2020 data

Preamble:

OEB staff has prepared the following OEB Staff Table 3 with data from Reference #1, #2, #3, and #4.

OEB Staff Table 3 – Reconciliation of RRR 2.1.7 Data – Account 4705

		VRZ, GA Analysis Workform, Account 1588 Reasonability Test, August 18, 2021	Veridian Connections Inc. Actual RRR 2.1.7 Filing	Veridian Connections Inc. RRR 2.1.7 Variance over the Actual RRR 2.1.7 Filing		
		A	B	C = A - B		
Account 4705 - December 31, 2018		141,704,997	141,704,997	-		
		WRZ, GA Analysis Workform, Account 1588 Reasonability Test, August 18, 2021	VRZ, GA Analysis Workform, Account 1588 Reasonability Test, August 18, 2021	Ellexicon Energy RRR 2.1.7 per GA Analysis Workforms	Ellexicon Energy Actual RRR 2.1.7 Filing	Ellexicon Energy RRR 2.1.7 Variance over the Actual RRR 2.1.7 Filing
		D	E	F = D + E	G	H = F - G
Account 4705 - December 31, 2019		TBD	144,416,286	TBD	139,698,760	TBD
Account 4705 - December 31, 2020		69,829,555	191,818,073	261,647,628	261,647,628	0

Question:

- a) Does Ellexicon agree with the values shown in OEB Staff Table 3? If Ellexicon disagrees, please update the table accordingly.



Response:

Ellexicon Energy Inc. (“Ellexicon”) agrees with the values shown in OEB Staff Table 3.

b) Please populate the cells that are marked “TBD” and explain differences, if any, in Column H.

Response:

The cells marked “TBD” have been populated and the amounts are identified in red. The updated table is provided below and includes a footnote which explains the 2019 variance.

**OEB Staff-23b Table 1: Revised OEB Staff Table 3 - Reconciliation of RRR
2.1.7 Data – Account 4705**

	VRZ, GA Analysis Workform, Account 1588 Reasonability Test - OEB Staff-23 A	Veridian Connections Inc. Actual RRR 2.1.7 Filing B	Veridian Connections Inc. RRR 2.1.7 Variance over the Actual RRR 2.1.7 Filing C=A-B
Account 4705 - December 31, 2018	141,704,997	141,704,997	-

	WRZ, GA Analysis Workform, Account 1588 Reasonability Test - OEB Staff-23 D	VRZ, GA Analysis Workform, Account 1588 Reasonability Test - OEB Staff-23 E	Ellexicon Energy Actual RRR 2.1.7 per GA Analysis Workforms F=D+E	Ellexicon Energy Actual RRR 2.1.7 Filing G	Ellexicon Energy RRR 2.1.7 Filing Variance over the Actual RRR 2.1.7 Filing H=F-G
Account 4705 - December 31, 2019*	50,470,616	144,416,286	194,886,902	139,698,760	55,188,142
Account 4705 - December 31, 2020	69,829,555	191,818,073	261,647,628	261,647,628	-

* Ellexicon Energy filed 2019 RRR 2.1.7 for the post-merge period (April - December). This was based on discussions with OEB Staff. As the GA Workform 1588 test for reasonability is intended to be based on an annual 4705 amount, the sum of the legacy LDC for Jan-March 2019 + the relevant Ellexicon rate zone for April - December 2019 was included. This ensured that the reasonability calculation was handled consistently for all years. As a result, there is an expected variance to the Actual 2.1.7 (column H).



c) Please explain any other differences that may arise if Elexicon updates OEB Staff Table 3.

Response:

Please see response (b) and (d).

d) Please confirm that Elexicon filed a harmonized RRR 2.1.7 for December 31, 2019 and December 31, 2020 data, but filed separated RRR 2.1.7 for December 31, 2018 data for Veridian Connections Inc. and Whitby Hydro Electric Corporation. If this is not the case, please explain.

Response:

Elexicon confirms the following RRR 2.1.7 filings:

- 2018 – Separate Veridian Connections Inc. and Whitby Hydro Electric Corporation filings
- 2019 – Post merger harmonized filing. This filing did not include a full year of P&L data since the merger was only effective April 1, 2019.
- 2020 – Harmonized filing



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**Reference: (1) VRZ, IRM Rate Generator Model, August 18, 2021
(2) VRZ, GA Analysis Workform, August 18, 2021**

Question:

At Reference #1, Ellexicon has included an Account 1588 2020 principal adjustment of \$111,001 in cell BF28. This matches the Account 1588 2020 principal adjustment of \$111,001 at Reference #2, Tab Principal Adjustments. However, this does not match the credit of (\$19,194) 2020 principal adjustment at Reference #2, Tab Account 1588 Reasonability.

a) Please clarify which is the correct Account 1588 2020 principal adjustment –a debit of \$111,001 or a credit of (\$19,194). Please provide any necessary updates to reconcile the two amounts.

Response:

Ellexicon Energy Inc. (“Ellexicon”) has provided updated versions of the following files:

- VRZ IRM Rate Generator model
EE_VRZ_2022_IRM-Rate-Generator-Model_OEB Staff-25_20211108.xlsm
- VRZ GA Analysis Workform
EE_VRZ_2022_GA Analysis Workform_OEB Staff-25_20211108.xlsm

Both revised models reflect a revised Account 1588 2020 principal adjustment of \$247,890. OEB Staff-25 provides an overview of the model updates.



OEB STAFF – 25

Reference:

WRZ Rate Generator, Tab 20 and VRZ Rate Generator, Tab 20 - Bill Impact

Question:

OEB staff has identified that the Non-RPP Retailer Average Price and Average IESO Wholesale Market Price used at the above reference were incorrectly entered as \$0.2689. OEB staff has updated the pricing to reflect the correct amount of \$0.1060.

a) Please confirm that the models included with these interrogatories reflect this update.

Response:

Ellexicon Energy Inc. ("Ellexicon") confirms that all models included with OEB Staff interrogatory responses reflect the updated pricing amount of \$0.1060.

For additional clarity, an overview of all updated IRM Rate Generator and supporting models included with these interrogatory responses is provided below:

Veridian Rate Zone (VRZ) – IRM Rate Generator Model

EE_VRZ_2022_IRM-Rate-Generator-Model_OEB Staff-25_20211108.xlsb

EE_VRZ_2022_Tariff of Rates and Charges_OEB Staff-25_20211108.pdf

This model and Tariff Sheet includes:

- The updated pricing amount of \$0.1060 (OEB Staff-25)
- Correction of Tab 6 - Class A Consumption Data (OEB Staff-16)



- Revised Account 1588 and 1589 Principal adjustments related to unaccounted for energy issue and reflect updated metering, settlement and regulatory accounting analysis review (OEB Staff-18)
- Revised ICM Rate Rider (OEB Staff-9)

VRZ IRM Rate Generator model - ICM removed (OEB Staff-13)

EE_VRZ_2022_IRM-Rate-Generator-Model_OEB Staff-13_20211108.xlsb

EE_VRZ_2022_Tariff of Rates and Charges_OEB Staff-13_20211108.pdf

This model and Tariff Sheet includes:

- The updated pricing amount of \$0.1060 (OEB Staff-25)
- Correction of Tab 6 - Class A Consumption Data (OEB Staff-16)
- Revised Account 1588 and 1589 Principal adjustments related to unaccounted for energy issue and reflect updated metering, settlement, and regulatory accounting analysis review (OEB Staff-18)
- Removal of ICM (OEB Staff-13)

In support of the VRZ IRM Rate Generator model updates, the following additional files have been updated and provided:

VRZ GA Analysis Workform (OEB Staff-25)

EE_VRZ_2022_GA Analysis Workform_OEB Staff-25_20211108.xlsb

This model includes:

- Revised Account 1588 and 1589 Principal adjustments related to unaccounted for energy issue and reflect updated metering, settlement and regulatory accounting analysis review (OEB Staff-18)



VRZ Accounting Guidance 2020 Analysis (OEB Staff-25)

EE_VRZ_2022_Acctg Guidance 2020 Analysis_OEB Staff-25_20211108.xlsx

This model includes:

- Revised Account 1588 and 1589 Principal adjustments related to unaccounted for energy issue and reflect updated metering, settlement and regulatory accounting analysis review (OEB Staff-18)

VRZ ICM Model (OEB Staff-9)

EE_VRZ_2022_ACM_ICM_Model_OEB Staff-9_20211108.xlsm

This model includes:

- Revised depreciation amounts outlined in OEB Staff-9

Whitby Rate Zone (WRZ)

No WRZ IRM Rate Generator model updates were submitted as part of the interrogatory responses.



Elexicon Energy Inc.

2022

IRM Rate Application
Interrogatory Response - MSIFN

EB-2021-0015 | November 8, 2021



MSIFN – 1

Reference: Appendix B, Incremental Capital Module “ICM”

Question:

The Seaton Transformer Station (“Seaton 23 TS”) and the Bus Rapid Transit Highway 2 (“BRT”) projects are subject to Ontario’s *Environmental Assessment Act*.

Please provide:

- a) Written direction from Ontario for Seaton 23 TS and BRT with respect to the delegation of the duty to consult to the proponents for each project.**

Response:

For the Seaton TS, the Project received written direction from the Ministry of Energy on June 3, 2016 with a list of Indigenous communities that were recommended to be consulted. The letter is attached as MSIFN 1a) Attachment Response_Ministry of Energy

Pursuant to O.Reg. 116/01, the Electricity Projects regulation under Ontario’s *Environmental Assessment Act*, lines that operate at nominal voltages of less than 115 kV are not subject to the Act. This is further clarified in the *Guide to Environmental Assessment Requirements for Electricity Projects*¹ (the “Guide”) which in Chart 1 identifies lines that operate at voltages of less than 115 kV as a “Category A” project.

The Guide explains that:

“Category A projects are those which are expected to have minimal environmental effects. These projects do not require approval under the Environmental

¹ <https://www.ontario.ca/page/guide-environmental-assessment-requirements-electricity-projects>



Assessment Act, and are not designated as being subject to the Act in the Electricity Projects Regulation.”

Elexicon’s scope of work, as it relates to the BRT, involves the relocation of electricity distribution lines that operate at a nominal voltage of less than 50 kV. As identified above, these lines constitute a Category A project. Such a project is expected to have minimal environmental effect. Therefore, it does not require approval under the *Environmental Assessment Act*.

Elexicon notes that the broader BRT project may require the applicable road/transportation authorities to obtain an environmental assessment, however this is entirely outside of Elexicon’s scope of work.

b) Summaries of how consultation with Indigenous groups directly impacted proponent decisions for each project, including decisions on alternative sites and alternative methods.

Response:

For Seaton TS, no specific input on site selection was provided by Indigenous communities during the environmental assessment (“EA”). The Indigenous communities (the “communities”) that were identified by the Ministry of Energy were notified about the proposed project. They were regularly informed of project updates and asked to provide input related to the proposed project during the EA. During consultation activities, the communities expressed interest to be kept informed about the proposed project. Some of the communities were also interested in being informed of any archaeological work. A summary of interests and concerns is noted in the table, below.



MSIFN-1- Table 1- Community Interest and Concerns

First Nation Community	Interests/Concerns	Project Response
Alderville First Nation (AFN)	The community does not have any specific concerns about the Project but would like to be kept informed of archaeological work.	The Proponent will keep AFN informed of archaeological work done as part of the Project.
Curve Lake First Nation (CLFN)	The community has concerns related to the remains of their ancestors and would like to be kept informed of any relevant archaeological findings.	The Proponent will keep CLFN informed of the Project.
Hiawatha First Nation (HFN)	The community expressed interest in archaeological work and would like to provide monitors if any excavation work is to be done.	The Proponent will keep HFN informed regarding archaeological work, including any excavations (i.e. Stage 2 Archaeological Assessment), and engage monitors as requested.
Huron Wendat First Nation (HWFN)	The community expressed interest in archaeological work and would like to provide input to any Stage 2 work.	The Proponent has informed HWFN of upcoming Stage 2 archaeological work and will engage monitors as requested.
Kawartha Nishnawbe First Nation (KNFN)	The community has not provided any correspondence for the Project.	The Proponent will continue to provide notifications to KNFN per the requirements of the Class EA
Mississaugas of Scugog Island First Nation (MSIFN)	The community expressed interest in archaeological work and would like to provide monitors for Stage 2 work.	The Proponent will keep MSIFN informed regarding archaeological work, including any excavations (i.e. Stage 2 Archaeological Assessment) and engage monitors as requested.



Additionally, consultation with Indigenous communities was utilized following the discovery of the burial site within the project limits. Through this consultation, Indigenous communities shared their concern with the movement of any materials from the burial site area. They also indicated that it was desirable to keep them located on-site. Elexicon was able to modify the design of the site in order to shift the construction away from the burial zone and provide an acceptable buffer area between the project and the burial site. The additional costs to the project for consultation, engineering design changes and long term burial site protection plan have been included in the expected cost of the project.

c) Environmental assessment guidance referenced for the assessment of cumulative effects for each project.

Response:

The environmental assessment for Seaton TS did not use any reference material for cumulative effects. The environmental assessment process used for the Project followed the Class Environmental Assessment for Minor Transmission Facilities (Class EA; Ontario Hydro, 1992) which was the most up to date, applicable, parent Class EA at the initiation of Elexicon Energy Inc.'s predecessor, Veridian's, environmental assessment. The Class EA did not require the consideration of, nor provide guidance on assessing cumulative effects.

d) Environmental assessment sections, chapters or available drafts detailing cumulative effects assessment methodologies and results for each project.

Response:

An assessment of cumulative effects was not completed as part of the environmental assessment for Seaton TS. As identified in the response to part c), the environmental assessment process used for the project followed the Class Environmental Assessment for Minor Transmission Facilities (Class EA; Ontario Hydro, 1992) which was the most up to date, applicable, parent Class EA at the initiation of Elexicon's predecessor, Veridian's



environmental assessment. The Class EA did not require the consideration of, nor provide guidance on cumulative effects.

e) Environmental assessment and/or Provincial Policy Statement guidance referenced for the assessment of cultural heritage landscapes for each project.

Response:

The following guidance documents were used in the assessment of cultural heritage landscapes for Seaton TS:

- Class Environmental Assessment for Minor Transmission Facilities (Class EA; Ontario Hydro, 1992);
- Standards and Guidelines for Consultant Archaeologists (Ministry of Tourism, Culture and Sport, 2011);
- Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes, a Checklist for the Non-Specialist (Ministry of Tourism, Culture and Sport, 2016).

f) Environmental Assessment sections, chapters or available drafts detailing cultural heritage landscape assessment methodologies and results for each project.

Response:

The following sections and appendices from the Seaton Municipal Transformer Station Project, Environmental Study Report (ESR) (2018) provide the cultural heritage landscape methodologies and results for the Seaton TS Project:

- ESR Section 3.3: Cultural Heritage Resources;
- ESR Section 5.2: Evaluation Criteria;
- ESR Appendix B-1: Stage 1 Archaeological Assessment;



- ESR Appendix B-2: MTCS Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes

The ESR and appendices can be accessed at the following website:
<http://www.veridian.on.ca/ea-study-seaton/>

g) Costs incurred to-date for consultation with Indigenous groups for Seaton 23 TS.

Response:

Please see the response to Staff-14 Table 1- Capitalized Consultation Costs.

h) Costs incurred to-date for consultation with Indigenous groups for BRT.

Response:

No consultation costs have been incurred for BRT.

i) Costs incurred to-date for archaeological and cultural heritage assessments for Seaton 23 TS.

Response:

MSIFN-1 Table 2 - Days in Field for Archaeology

Phase	Days in Field
Stage 2 TS/Corridor	10
Stage 3	60
Stage 4 P1	19
Stage 4 P2	45
Stage 4 P3	139
Stage 2 East Driveway	1
Stage 2 South Driveway	1
Burial Investigation	18
TOTAL	293



The costs in Table 3 below are separate and incremental to those listed in the response to Staff-14. They are also already included in the capitalized costs of the project in the Seaton Transformer line of the table included in response to Staff-14.

MSIFN-1- Table 3 - Costs Incurred to Date- Archaeological and Cultural Heritage Assessments

Type of Work Completed	Cost (\$)
Stage 1 Archaeology and Heritage	Included in overall WSP Environmental Assessment scope and not broken out individually
Stage 2 Archaeology- TS site and Transmission corridor/tap line	\$0.04MM
Stage 3 Archaeology	\$0.34MM
Stage 4 Archaeology- P1	\$0.16MM
Stage 4 Archaeology- P1- additional excavations	\$0.23MM
Stage 4 Archaeology- P2	\$0.16MM
Stage 4 Archaeology- P3	\$0.61MM
Other minor work completed by WSP	\$0.02MM
Burial Investigation	\$0.27MM
Total:	\$1.83MM



- j) **Costs incurred to-date for archaeological and cultural heritage assessments for BRT.**

Response:

No costs have been incurred for archaeological and cultural heritage assessments for BRT.

Ministry of Energy

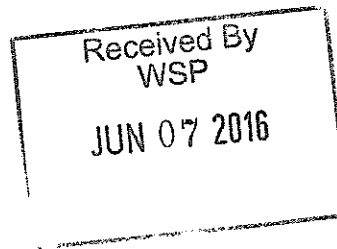
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Indigenous Energy Policy

June 3, 2016

Daniel Charbonneau
Senior Manager, First Nation & Métis Relations
Hydro One Networks Inc.
483 Bay Street, TCT6, South Tower
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Craig Smith, P. Eng.
Project Manager, Veridian Connections
Veridian Connections
55 Taunton Rd. E.
Ajax, ON L1T 3V3

Re: Seaton Transformer Station Environmental Assessment

Dear Messrs. Charbonneau and Smith:

Thank you for your letter of March 31, 2016 regarding the Class Environmental Assessment being undertaken by Veridian Connections ("Veridian") to evaluate alternative sites for a new 230 kV transformer station.

I understand from your letter that the transformer station Veridian is proposing to build, called Seaton Transformer Station (Seaton TS) is required to be connected to the transmission grid by Hydro One Networks Inc. (HONI). Furthermore, that Veridian and HONI have entered into a co-proponency agreement for the *Class Environmental Assessment (EA) for Minor Transmission Facilities* for both the Seaton TS facility and the upgrading of existing transmission lines to supply the new station. The planned construction of the Seaton TS and the upgrade of transmission lines to support it are required to supply the urban community of Seaton in Central Pickering.

You have informed the Ministry of Energy ("the Ministry") that there are three siting locations proposed for the new station, each with similar transmission line upgrade requirements as follows:

SL TS Site:

- Located in the northeast corner of Taunton Rd. and Side Line 22.
- Circuit C28C and Circuit C10A will be upgraded between Duffin Jct. and the proposed Seaton TS (the single 230 kV circuit will be replaced with a double 230 kV circuit approx. 1.5 km long).

Brock TS Site:

- Located north of Taunton Rd. on the east side of Brock Rd.
- Circuit C28C and Circuit C10A will be upgraded between Duffin Jct. and the proposed Seaton TS (i.e., a single 230 kV circuit will be replaced with a double 230 kV circuit approx. 3.5 km long).

CW TS Site:

- Located close to Hydro One owned Cherrywood TS and situated in the north east corner of circuit P15C and Dixie Rd.
- Tapping from C10A and upgrading Circuit P15C from Cherrywood TS are required to supply Seaton TS (i.e., single 230 kV circuit will be replaced with a double 230 kV circuit approx. 1 km long).

Work required for the construction of the proposed Seaton TS in each option would entail greenfield development and include:

- Construction of site access roads- length dependent on specific site. Roads will remain permanently to provide access to the site;
- Preparation of station site for construction- including possible tree/vegetation removal, grading/filling of site;
- Installation of ground grid cabling (to be covered by soil/gravel);
- Installation of oil containment (open concrete 'tubs' to contain oil, rainwater and snowmelt should it leak from transformers);
- Installation of equipment foundations for outdoor, open steel framework structures;
- Installation of concrete ducts used for protection of underground cables that will egress from station to nearby streets;
- Construction of the outdoor, open steel framework in the 230kV yard (approx. 50m x 75m);
- Construction of site building which will house additional equipment and small site office contained in the building;
- Installation of the actual conductors to carry the 230kV into the station and to carry the 28kV output of the station to nearby roads;
- Connection of the station to the nearby transmission lines;
- Installation of 2 large station transformers on their foundations;
- Transformers mounted outside in free air (i.e. not contained inside a building);
- Installation of fire separation wall between transformers;
- Security fencing installed around entire site (approx. 100m x 200m); and
- Site landscaping.

You have advised the Ministry that the work to upgrade the transmission circuits for each of the three proposed transmission upgrade options is similar and would include:

- Removal of constraints from the Right of Way (i.e. trees);
- Construction of temporary access roads;
- Construction and connection of a wood pole bypass line;
- Removal of old towers and foundations;
- Construction of new foundations and towers;
- Stringing of towers;
- Disconnection and removal of the wood pole bypass line; and
- Removal of temporary access roads.

Based on the information HONI has provided to date, the Ministry is of the view that the project has the potential to result in appreciable adverse impacts on the asserted or established rights of First Nation communities. Based on currently available information the following communities should be consulted on the basis that they have or may have constitutionally protected Aboriginal or treaty rights that may be adversely impacted by the project:

COMMUNITY	MAILING ADDRESS
Alderville First Nation*	PO Box 46 Roseneath ON K0K 2X0 Phone: (905) 352-2011 Fax: (905) 352-3242
Curve Lake First Nation*	22 Winookeeda Road General Delivery Curve Lake ON K0L 1R0 Phone: (705) 657-8045 Fax: (705) 657-8708
Hiawatha First Nation*	123 Paudash Street Hiawatha ON K9J 0E6 Phone: (705) 295-4421 Fax: (705) 295-4424
Mississaugas of Scugog Island First Nation*	22521 Island Road Port Perry ON L9L 1B6 Phone: (905) 985-3337 Fax: (905) 985-8828
Huron Wendat	255 Place Chef Michel Laveau Wendake, QC G0A 4V0
Kawartha Nishnawbe	PO Box 1432 Lakefield ON K0L 2H0 Phone: (705) 654-4661

* Note: It is standard practice to copy all correspondence to the Williams Treaty First Nations to Karry Sandy-McKenzie, Williams Treaty First Nations Process Coordinator at 8 Ceswick Court, Barrie ON L4M 2J7 or inquiries@williamstreatiesfirstnations.ca

The Ministry recommends that Veridian and HONI each maintain a record of their interactions with Indigenous communities about the project. In the event that a community provides Veridian or HONI with information indicating a potential adverse impact of this project on its Aboriginal or treaty rights, I request that you notify the Ministry as appropriate.

Finally, once the decision has been made regarding which option will be implemented, please share this information with the Ministry.

Please do not hesitate to contact Adam Feather, Policy Advisor at 416-326-0513 or adam.feather@ontario.ca if you have any further questions or you wish to discuss this matter in more detail.

Sincerely,



Amy Gibson
Manager, Indigenous Energy Policy

c: **Andrew Roberts**, M.Sc., Project Manager – Consultant, Veridian Connections

Brian McCormick, Manager, Environmental Services and Approvals, Hydro One

Farah El Ayoubi, Team Lead, Environmental Engineering and Project Support, Hydro One

Olivera Radinovic, Environmental Planner, Environmental Engineering and Project Support, Hydro One

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MSIFN – 2

Reference: 1. Introduction, page 4

Question:

Please provide Indigenous relations policies, including any procurement policies referencing Indigenous-owned vendors, for:

a) Whitby Hydro Electric Corporation

Response:

The former legacy utility, Whitby Hydro Electric Corporation did not have any Indigenous relation policies or procurement policies referencing Indigenous-owned vendors.

b) Veridian Connections Inc., and

Response:

The former legacy utility, Veridian Connections Inc. did not have any Indigenous relation policies or procurement policies referencing Indigenous-owned vendors.

c) Elexicon Energy Inc.

Response:

Elexicon Energy (“Elexicon”) currently does not have any Indigenous relation policies or procurement policies referencing Indigenous-owned vendors.



MSIFN – 3

Reference: Appendix B-2, page 15

Question:

Elexicon describes using competitive procurement process for all major purchases on the Seaton 23 TS project.

- a) Please provide further details any procurement considerations with respect to procurement from Indigenous-owned contractors/suppliers, and how quotes/bids were assessed with respect to Indigenous contractor/supplier content.**

Response:

Elexicon Energy Inc. (“Elexicon”) has used a competitive procurement process for all major purchases on the Seaton TS project. Please see the response to Staff-3 a) for further details on the procurement process for Seaton TS. Elexicon does not have a procurement policy that specifically identifies Indigenous-owned contractors/suppliers for the Seaton TS, at this time.

Please also see the response to MSIFN-2(c).



b) Please provide the Indigenous relations policies, including any procurement policies, for primary contractors for the Seaton TS project.

Response:

As noted in the above response (a), Elexicon has used a competitive procurement process for major purchases including primary contractors for the Seaton TS project.

Please also see the response to MSIFN-2(c).



MSIFN – 4

Reference: DSP, Appendix S-1, page 6, 27

Question:

Seaton 23 TS will be owned and operated by Elexicon. Hydro One Networks Inc. (HONI) regularly considers options for joint project ownership with First Nations with respect to new projects.

a) Was the option of joint project ownership with First Nations considered for the Seaton 23 TS project? Why or why not?

Response:

Elexicon Energy Inc. ("Elexicon") had not considered joint ownership with First Nations for Seaton TS.

The idea of joint ownership was not raised by any First Nation during consultations in relation to the Seaton TS. Please also see the response to MSIFN-1(b).



MSIFN – 5

Reference: N/A

Preamble:

Ontario Power Generation (OPG), a major OEB regulated energy supplier in Durham Region, recently released its Reconciliation Action Plan, described as a “road map for how we intend to work in partnership with Indigenous communities, businesses and organizations to advance reconciliation. It’s also about how we intend to grow and continue learning as an organization”. OPG’s Reconciliation Action Plan references OPG’s Indigenous Relations Policy first developed in 2007 which sets out OPG’s objectives for respecting Indigenous rights and interests, rules for developing and maintaining mutually beneficial relationships and partnerships with Indigenous communities, policies that require engaging in community relations and outreach, and paths to providing capacity building support, including employment and business contracting opportunities (see: <https://www.opg.com/building-strong-and-safe-communities/indigenous-relations/>)

Question:

- a) Assuming that Seaton TS and BRT receive ‘leave to construct’, please provide Elexicon’s perspective on how it is considering reconciliation action and Indigenous relations policies to inform construction, and inform construction procurement.**

Response:

Elexicon Energy Inc. (“Elexicon”) is actively working with affected Indigenous communities to inform on construction activity at the Seaton TS.

Several First Nations have signed Field Liaison agreements to monitor elements of the construction on the Seaton TS site.



Elexicon is actively considering the development of Indigenous-related policies. Elexicon will also review OPG's Reconciliation Action Plan, released on October 21, 2021, as well as other plans as it works through this process.



Elexicon Energy Inc.

2022

IRM Rate Application

Interrogatory Response - PWU

EB-2021-0015

| November 8, 2021



PWU – 1

Reference: MAADs Application (EB-2018-0236), page 20

Under the proposed rate-making plan, LDC Mergeco will annually file a PCIR application for the previous Veridian LDC service area and an AIRI application for the previous Whitby LDC service area for the duration of the 10 year rebasing deferral period. The proposed rate making plan includes the provision of an Incremental Capital Module (“ICM”), applicable to the Veridian LDC service area only, for the nondiscretionary Seaton TS and Belleville service centre capital investments referenced above.

Reference: MAADs Application (EB-2018-0236), page 41

At the time of this Application, Veridian LDC has identified ICM requirements during the deferral period. These capital investments include but are not limited to supporting the forecasted electricity demands in north Pickering by means of a new transformer station (Seaton MTS) and capital investments required to meet the future needs of the Belleville Operations Centre.

Question:

a) What is the status of the Belleville service centre project?

Response:

Elexicon will not be filing an ICM for the Belleville Operations Centre.

The Belleville Operations Centre is currently in the planning stages. Construction is expected to begin in April of 2022 and is expected to be completed in November 2022.

b) Did Elexicon identify the Bus Rapid Transit Highway 2 (“BRT”) project as a potential ICM requirement at the time of the MAADs application (filed July 30, 2018)?



Response:

No, Elexicon did not identify the BRT project as a potential ICM requirement at the time of the MAADs application.

c) Did Elexicon consider any additional projects as candidates for ICM treatment in 2022?

Response:

Elexicon did not formally consider any other additional projects for ICM treatment in 2022, other than the two ICM projects in this application (Seaton TS and BRT Hwy 2), and the Belleville Operations Centre (which Elexicon has decided not to include as an ICM).



PWU – 2

Reference: Appendix B-1: Bus Rapid Transit DSP Business Case, page 1

Preamble:

Ellexicon's Bus Rapid Transit ("BRT") Relocations project is driven by Metrolinx, the Region of Durham, and Durham Region Transit to relocate existing overhead or underground infrastructure for the proposed BRT network. It is mandatory to comply with these initiated changes to public roads as based upon the Public Service Works on Highways Act ("PSWHA"). The BRT network will bring about a streamlined and enhanced public transportation option for Durham residents and Ellexicon customers. This scope of work pertains to planned work in Pickering along Highway 2, from Dixie Rd to Liverpool Rd and from Glenanna Rd to Brock Rd. Future BRT work in Ajax and Whitby is still pending an environmental assessment by the Road/Transportation Authorities and has not been budgeted at this time.

Question:

- a) Does Ellexicon anticipate that it will apply for ICM funding in the future for BRT work in Ajax and Whitby?

Response:

Ellexicon has not yet determined whether it will apply for ICM funding related to future BRT work in Ajax and Whitby. Ellexicon will need to review its planned capital expenditures closer to the expected in-service dates of such projects to determine whether or not ICM treatment would be appropriate.

- b) Does Ellexicon consider the Highway 2 (Dixie to Liverpool and Glenanna to Brock) to be a discrete project or a component of the overall BRT Relocations project?

Response:

Ellexicon considers Highway 2 (Dixie to Liverpool and Glenanna to Brock) to be a discrete project. Please see Ellexicon's response to OEB Staff-11 for a full explanation.



PWU – 3

Reference: Appendix B-1: Bus Rapid Transit DSP Business Case, page 1

Preamble:

Table 1: Expenditure Summary

	Actual (\$M)		Projected (\$M)					
	Predecessor 2014-2019 Average	2020	2021	2022	2023	2024	2025	2026
Gross Program Expenditures	0.00	0.00	0.00	5.30	0.00	0.00	0.00	0.00
Contributions	0.00	0.00	0.00	1.92	0.00	0.00	0.00	0.00
Net Program Expenditures	0.00	0.00	0.00	3.38	0.00	0.00	0.00	0.00

Question:

a) Please describe how the \$1.92M contributions figure was determined.

Response:

The capital contributions are calculated on a case-by-case basis based on the agreements between Elexicon and the Region of Durham. All the contributions are calculated in accordance with the Public Service Works on Highways Act, R.S.O. 1990, c. P.49. The breakdown of contributions for the BRT project is presented in PWU-3 Table 1 below.



PWU-3 Table 1: BRT Project Estimated Expenditure Summary Breakdown

		Gross (\$MM)	Contribution (\$MM)
Engineering	(a)	0.33	
Labour, Vehicles, Subcontractors	(b)	3.84	1.32
Material	(c)	1.13	0.60
Subtotal		5.30	1.92



PWU – 4

Reference: Appendix B-2: Seaton TS DSP Business Case, page 9

Seaton TS is currently projected to be built in 2022. Development areas by Seaton are still being built and constructed as stated on the City's website. Elexicon will ensure that Seaton TS will be built in advance of all developments being finished. This will ensure that Seaton can be commissioned and to start connecting the customers to the new Elexicon substation. The current state of construction for the new neighbourhood outside of electrical work includes new roads and transportation connections, stormwater sewer and sanitary networks, water lines, natural gas delivery, and telecommunication expansion.

Reference: MAADs Application (EB-2018-0236), page 41

Absent a merger, Veridian LDC is scheduled to file a COS rate rebasing application for 2019 rates as per the normal five year cycle within the PCIR rate-setting framework. Veridian LDC's 2019 COS application would also include an Advanced Capital Module ("ACM") for a non-discretionary material transformer station investment in the Seaton TS that is expected to be in-service in 2020 and a potential investment in a service centre for the Belleville service area expected to be in-service in 2021.

Question:

a) Why was the Seaton TS delayed from 2020 to 2022?

Response:

During the course of the Seaton TS project, extensive archaeological work was required in order to clear the site for construction. In total, over 290 days of archaeological field work, spread over non winter seasons, was required over the life of the project. Discoveries made in the archaeological work required engineering work to shift the station within the site which took time to complete and coordinate. A longer than anticipated time was also required to complete Site Plan Approval and the Building Permit processes.



Finally, an extended period of time was required to finalize the land license deal in 2021 with Infrastructure Ontario as that agency took a considerable time to confirm consultation efforts completed by Elexicon with First Nations were adequate and appropriate.

b) Were the developments also delayed?

Response:

The pace of developments in the Seaton TS area have been slower than expected from the onset of this project up to, and including, the period from 2020-2022. See Elexicon's response to Staff-4.



PWU – 5

Reference: Distribution System Plan, page 32

Preamble:

Table 5.2-3: Summary of Changes to Asset Class Inspection Cycles for Electrical Plant

Asset Class	Legacy Veridian Cycle	Legacy Whitby Cycle	Elexicon Cycle
Wood Pole	8 years	3 years	3 years
Concrete Pole	None	3 years	3 years
Overhead Conductor	None	None	3 years
Pole-mounted TX	None	3 years	3 years
Pad-mounted TX	3 years	3 years	3 years
Overhead Switch (LIS Type)	3 years	3 years	3 years
Overhead Switch (non-LIS Type)	None	3 years	3 years
Distribution Switchgear	3 years	3 years	3 years
Underground Cable	None	None	None
Vault Transformer	3 years	None	3 years
Station Power Transformer	1.5 years	3 years	3 years
Station Circuit Breaker	1.5 years	3 years	3 years
Station Battery	1.5 years	3 years	3 years
Station Protective Relay	1.5 years	3 years	3 years
Building/Fence	None	None	None

Question:

- a) Why did Elexicon decide on the longer 3-year inspection cycle for station inspections instead of the 1.5 year cycle that has historically been used by Veridian?

Response:

In reviewing this question, Elexicon has identified a mistake in the DSP Table 5.2-3: *Summary of Changes to Asset Class Inspection Cycles for Electrical Plant*. Legacy



Veridian Cycles for all listed station inspections in the noted table should have read 3 years and Legacy Whitby Cycles for all listed Station inspections should have read 1.5 years. Corrected table is below.

Table 1: Summary of Changes to Asset Class Inspection Cycles for Electrical Plant (corrected)

Asset Class	Legacy Veridian Cycle	Legacy Whitby Cycle	Elexicon Cycle
Wood Pole	8 years	3 years	3 years
Concrete Pole	None	3 years	3 years
Overhead Conductor	None	None	3 years
Pole-mounted TX	None	3 years	3 years
Pad-mounted TX	3 years	3 years	3 years
Overhead Switch (LIS Type)	3 years	3 years	3 years
Overhead Switch (non-LIS Type)	None	3 years	3 years
Distribution Switchgear	3 years	3 years	3 years
Underground Cable	None	None	None
Vault Transformer	3 years	None	3 years
Station Power Transformer	3 years	1.5 years	3 years
Station Circuit Breaker	3 years	1.5 years	3 years
Station Battery	3 years	1.5 years	3 years
Station Protective Relay	3 years	1.5 years	3 years
Building/Fence	None	None	None

As part of the post-merger consolidation of systems and processes, Elexicon made the decision to adopt the former Veridian system of relays/batteries/chargers to better align these with the SCADA and communication platform in place, as well as long term vendor support for such systems. As such, Elexicon has generally adopted the 3-year inspection cycle which was consistent with the inspection regimen in place with the corresponding predecessor utility (Veridian). The exception to this practice is at the Thickson MS#7 station in Whitby, which maintains a 1.5 year inspection cycle due to its close proximity to the CN rail line, and concerns with contamination on equipment should the inspection cycle be extended to 3 years.



PWU – 6

Reference: Distribution System Plan, page 75

Preamble:

Table 5.2-20: Historical Performance for all Safety Performance Metrics

	Measure	Target	2014	2015	2016	2017	2018	2019	2020
Whitby	Level of Public Awareness	N/A	N/A	78.90%	78.90%	83.6%	83.6%	N/A	N/A
	Level of Compliance with O. Reg. 22/04*	C	C	C	C	C	C		
	Serious Electrical Incident Index	0	0	0	0	0	1		
	Serious Electrical Incident Index per 10, 100, 1000km	0	0	0	0	0	0.906		
Veridian	Level of Public Awareness	N/A	N/A	82.00%	82.00%	83.0%	83.0%	N/A	N/A
	Level of Compliance with O. Reg. 22/04*	C	C	C	C	C	C		
	Serious Electrical Incident Index	0	0	0	1	1	1		
	Serious Electrical Incident Index per 10, 100, 1000km	0	0	0	0.445	0.389	0.38		
Elexicon	Level of Public Awareness	N/A	N/A	81%	83%	83%	84%	84%	84%
	Level of Compliance with O. Reg. 22/04*	C	C	C	C	C	C	C	C
	Serious Electrical Incident Index	0	0	0	1	1	2	0	0
	Serious Electrical Incident Index per 10, 100, 1000km	0	0	0	0.273	0.268	0.528	0	0

*Compliance Assessment grades: Compliant (C); Needs Improvement (NI); or Non-Compliant (NC).

Question:

a) If 2019 and 2020 data is available, please provide. If not, please explain why it is not available.

Response:

The 2019 and 2020 data has been provided in the chart above under the merged entity of Elexicon. The historical data was provided separately, by rate zone, only for the years prior to the merger.



Elexicon Energy Inc.

2022

IRM Rate Application Interrogatory Response - SEC

EB-2021-0015 | November 8, 2021



SEC – 1

Reference: [Mgr. Summary, p.38]

Question:

Please provide a copy of all material provided to the Applicant's Board of Directors regarding the proposed ICM projects.

Response:

Elexicon is requesting confidential treatment, pursuant to Sections 10.01 and 10.02 of OEB's *Rules of Practice and Procedure* (Revised July 30, 2021) and Sections 5.1.1 and 5.1.2 of the OEB's *Practice Direction on Confidential Filings* (Revised February 17, 2021) ("Practice Direction") for information provided in response to SEC-1.

In response to SEC-1, Elexicon has filed materials submitted to Elexicon's Board of Directors regarding the proposed ICM projects (the "Board Materials").

To the extent the Board Materials include materials that are not related to the ICM projects, such irrelevant information has been redacted.

Elexicon has also included the Seaton Transformer Station Business Case as it is also part of the Board Materials, and is also referenced in SEC-2.

Attachments:

SEC-1 Board Materials Related to Seaton and BRT_20211108

SEC-2- 2016_08_17 – Seaton Transformer Station Business Case_20211108



SEC – 2

Reference: [Mgr. Summary, p.38]

Question:

Please provide a copy of any internal business cases for the proposed Projects, if different from the business cases filed with the Application.

Response:

Elexicon Energy Inc. (“Elexicon”) has filed the August 17, 2016 Seaton TS Business Case in its response to SEC-1.

Elexicon has attached the following business cases for BRT Hwy 2, both of which pre-date those in the DSP.

1. BRT Hwy 2 (Glenanna x Brock) Scope Document (January 6, 2020)
2. BRT Hwy 2 (Dixie x Liverpool) Scope Document (September 26, 2018)

As shown above, the BRT project was originally supported by two separate scope documents as the proposed in-service dates were initially in different budget years (2018 and 2020). This is not unlike any other non-discretionary System Access project, where Elexicon does not control the timing and scope of these projects. Based on the best available information today and as supported by the Business Case submitted as part of the DSP, Elexicon is confident that the in-service date of the BRT project will be 2022. (Please also refer to Elexicon’s response to Staff-12 and SEC-9).

Consistent with the Ontario Energy Board’s (“OEB”) *Report of the Board – New Policy Options for the Funding of Capital Investments: The Advanced Capital Module*, dated September 18, 2014, Section 7.4 states that, “at the time of the next cost of service or



Custom IR application, a distributor will need to file calculations showing the actual ACM/ICM amounts to be incorporated into the test year rate base. At that time, the Board will make a determination on the treatment of any difference between forecasted and actual capital spending under the ACM/ICM, if applicable, and the amounts recovered through ACM/ICM rate riders and what should have been recovered in the historical period during the preceding Price Cap IR plan term.”

Ratepayers are held harmless for the timing differences and Elexicon expects to clear the variance account at the time of its next rebasing.

Elexicon Energy Capital Project Scope Document

2. Capital Program Project Proposal Summary

Project Identification Information:			
			Date of Proposal: 2020 JAN 06
Proposal Version	R0		
Project Name	2017-0526 BRT Hwy 2 (Glenanna x Brock)		
Project District	Ajax		
Project Location	Kingston Road from Glenanna Road to Brock Road		
Project Number			
Project Period	2020		
Required In-Service Date	2020 DEC 31		
Preliminary Estimate: Total Capital Cost	Gross: \$8,400,000	Contribution: \$2,688,000	Net: \$5,712,000
Criteria Score	Non-discretionary		

Project Description:	
Investment Category	Primary: System Access 100%
Investment Type	Development
Category	G5 - Road Relocations
Discretion	Primary: Non-discretionary; project must be undertaken to comply with legal and/or regulatory requirements in the current period
Project Driver(s)	The Regional Municipality of Durham plan for Bus Rapid Transit The design is to modify Highway 2 through the Town of Ajax and City of Pickering to accommodate future traffic and transit services. The preferred design includes the widening of Highway 2 from four to six lanes to accommodate dedicated transit in curb lanes with buffered on-road bicycle lanes at six key intersections in the Town of Ajax and City of Pickering
Project Drivers Sources	Request from Regional Municipality of Durham
Project Scope	Relocation of Underground cables 44kV, 1000MCM, RWB, 81M-2 44kV, 1000MCM, RWB, 81M-7 13.8kV, 1/0 AWG, RWB, TOWN-F2 27.6kV, 500MCM, RWB, 47M-2

Elexicon Energy Capital Project Scope Document

Project Benefits	Customer focus/value - elimination of conflict between roads (or other infrastructure, sensitive lands, etc.) and distribution system Reliability: - reduced frequency of outages or risk of same - reduced duration of outages or risk of same Operational effectiveness/efficiency - NA Safety - NA Cyber-security and privacy - NA Coordination and Interoperability - NA Economic Development - NA Environmental Benefits - NA					
Project Costs	Current Fiscal Year	CFY + 1	CFY + 2	CFY + 3	CFY + 4	CFY + 5
	Total Capital	\$8,400,000				
	Contributions	\$2,688,000				
	Net Capital	\$5,712,000				
	Total Operating	NA				
Estimate Class	B (+/- 25%)					
Investment Criteria/Priority Score	Non-discretionary.					
Alternatives to Project	No technically viable and/or economically feasible alternatives to the proposed project were available because of the road relocation. Elexicon will be moving existing equipment out of the proposed road works.					
Risks and Issues – Elexicon Energy Perspective	Strategic: Project failure could affect Elexicon Energy's service area and/or reputation. Additionally, Failure of project completion could affect the Bus Rapid Transit in Region of Durham. Financial: No significant uncertainty around capital contributions or the cost estimate overall. Operational: There no significant uncertainty around the timing of the project Compliance/Regulatory: There is no uncertainty or ambiguity around whether the project meets or may violate compliance or regulatory requirements					

Elexicon Energy Capital Project Scope Document

Construction Constraints / Restrictions	- Preferred Seasonal Activity – construction may be more cost effective and efficient if completed during a specific season or time period (e.g. underground cable replacement is preferred outside of the winter season). - Restricted Access – access for construction may only be possible during a specific season or time period depending on Region of Durham timing.
Long Delivery Equipment or Material	500MCM Cable 1000MCM Cable
RFQ/RFP Required	RFQ/RFP required for the civil works and possibly the installation of the underground cable.
File References	Capital Projects- Scopes and Descriptions\2017-0526B BRT Hwy 2 (Glenanna x Brock)

Submitted By:	Mohammad Khonsari	Date: 6 January 2020
Checked By:	Ed Johnston	Date:
Reviewed By:	Faisal Habibullah	Date:
Approved By:	Kevin Whitehead	Date:

Previous versions are to be retained and not overwritten for record purposes to follow project scope development.

A. General Project Information (Refer to Page 20 in OEB Chapter 5 Requirements)

Capital and O&M Costs

Please refer to Project Description table above.

Customer Attachments and Load

Not Applicable.

Start Date, In-service Date, Expenditure Timing

Please refer to Project Identification and Project Description tables above.

Risks to Project Completion

- Delay in delivery of critical material.
- Unavailability of contractor or internal resources.

Expenditures on Equivalent Projects

Due to the site-specific and other highly individual features of this project, Elexicon has not been able to identify equivalent historical projects to which a comparison could be made.

Ellexicon Energy Capital Project Scope Document

Renewable Energy Generation Costs

This project does not involve any REG components.

Leave to Construct Requirements

This project does not require Leave to Construct approval.

B. Project Evaluation Criteria (Refer to Pages 20-21 in OEB Chapter 5 Requirements)

Primary Project Drivers

Ellexicon received a plant relocation request from the Region of Durham to move its distribution equipment to permit the widening of Highway #2 for Bus Rapid Transit.

Secondary Project Drivers

No significant secondary drivers for this project are present.

Project Priority

The project is non-discretionary. Projects are required to meet obligations under law or Code.

Project Benefits

System Operation Efficiency and Cost Effectiveness

No material effect on system operation efficiency and cost effectiveness is expected from these projects.

Customer Value

Lower operating and maintenance costs will result from the investment

Reliability

The project will result in reduced frequency of outages and/or reduced duration of outages

Safety

No material effect on safety is expected from this project.

Cyber-security and Privacy

No material effect on Cyber-security and Privacy is expected from these projects.

Coordination and Interoperability

No material effect on coordination and Interoperability.

Economic Development

No material effect on Economic Development is expected from this project.

Environmental Benefits

No material Environmental Benefits are expected from this project.

Elexicon Energy Capital Project Scope Document

C. Category-specific requirements for each project/activity (Refer to Pages 22 to 25 in OEB Chapter 5 Requirements)

Additional Information – System Access Projects

Timing and Priority

Region of Durham would like Elexicon to have project completed by end of 2020.

Customer and Third Party Preferences

No (other) customer or third party preferences were expressed in connection with this project.

Other Planning Objectives

No other planning objectives materially affected this project.

Final Economic Evaluation

An Economic Evaluation was not applicable to this project.

System Impacts

No material system impacts are created by this project.

Identification and Assessment of Project Alternatives

No technically viable and/or economically feasible alternatives to the proposed project were available because of the road relocation. Elexicon will be moving existing equipment out of the proposed road works.

Veridian Capital Project Tracking and Reporting Template

2. Capital Program Candidate Project Proposal Summary

Project Identification Information:			
			Date of Proposal: 2018 September 26
Proposal Version	R0 = Original submission		
Project Name	BRT Hwy 2 (Dixie x Liverpool)		
Project District	Ajax		
Project Location	Kingston Rd from Dixie Road to Liverpool Road		
Project Number	2017-0526C ARR.18.015/1830.18.345		
Project Period	2018		
Required In-Service Date	2018 DEC 30		
Preliminary Estimate: Total Capital Cost	Gross: \$720,000	Contribution: \$216,000	Net: \$504,000
Criteria Score	Non-Discretionary		

Project Description:	
Investment Category	Primary: System Access 100% System Renewal 0% System Service 0% General Plant 0%
Investment Type	Development
Category	G2 New Feeders
Discretion	Primary: 1. Non-discretionary; project must be undertaken to comply with legal and/or regulatory requirements in the current period
Project Driver(s)	1. Primary of project: The Regional Municipality of Durham plan for Bus Rapid Transit The design is to modify Highway 2 through the Town of Ajax and City of Pickering to accommodate future traffic and transit services, The preferred design includes the widening of Highway 2 from four to six lanes to accommodate dedicated transit in curb lanes with buffered on-road bicycle lanes at six key intersections in the Town of Ajax and City of Pickering 2. Secondary driver: No secondary drivers.
Project Drivers Sources	Request from Regional Municipality of Durham
Project Scope	Relocation of 36 hydro poles.
Project Benefits	Customer focus/value - access to the system for new customers Reliability - NA

Veridian Capital Project Tracking and Reporting Template

	Operational effectiveness/efficiency • NA Safety • NA Cyber-security and privacy • NA Coordination and Interoperability • NA Economic Development • NA Environmental Benefits • NA					
Project Costs	Current Fiscal Year	CFY + 1	CFY + 2	CFY + 3	CFY + 4	CFY + 5
	Total Capital	\$720,000				
	Contributions	\$216,000				
	Net Capital	\$504,000				
	Total Operating	\$720,000				
Estimate Class	B (+/- 25%) Other estimate classes <A (+/-10%); B (+/-25%)>					
Investment Criteria/Priority Score	Non-Discretionary					
Alternatives to Project	a) No alternatives to the project are technically feasible or cost effective b) The status quo (do nothing) is not recommended, since workers and public safety is of concern					
Risks and Issues – Veridian Perspective	• Strategic: The project (or its failure) can affect Veridian's reputation. • Financial: There is no significant uncertainty around capital contributions or the cost estimate overall • Operational: There no significant uncertainty around the timing of the project • Compliance/Regulatory: There is no uncertainty or ambiguity around whether the project meets or may violate compliance or regulatory requirements					
Construction Constraints / Restrictions	There are no construction constraints/restrictions for this project.					
Long Delivery Equipment or Material	36 Hydro Poles					
RFQ/RFP Required						
File References	BRT Hwy 2 (Liverpool x Dixie)					

Submitted By:	Matthew Fisher	Date: September 26, 2018
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Veridian Capital Project Tracking and Reporting Template

Checked By:	Ed Johnston	Date:
Reviewed By:	Craig Smith	Date:
Approved By:	Peter Petriw	Date:

Previous versions are to be retained and not overwritten for record purposes to follow project scope development.

A. General Project Information (Refer to Page 20 in OEB Chapter 5 Requirements)

Capital and O&M Costs

Customer Attachments and Load

Not Applicable.

Start Date, In-service Date, Expenditure Timing

Please refer to Project Identification and Project Description tables above.

Risks to Project Completion

No significant or unusual risks to project completion have been identified for this project.

Expenditures on Equivalent Projects

Budget Number	Project Name	Project Number	Number of Poles	# of Circuits & (O/H or U/G or O/H & U/G)	Cost	Cost per pole
2009-0002	Brock Rd Relocation (Rossland X CPR Tracks)	ACA.08.0018	38	2 circuits (38 poles of stringing)	\$ 772,990.00	\$ 20,341.84
2012-0039	Hwy#2 Widening (Denmar x Southview) due to BRT	ARR.12.0005	34	2 circuits North 3 circuits south O/H	\$ 840,431.00	\$ 24,718.56
2012-0001A	Pickering Beach Road 44kV Feeder- North	ACA.13.0001	13	3 circuits O/H	\$ 309,818.00	\$ 23,832.15

Renewable Energy Generation Costs

This project does not involve any REG components.

Leave to Construct Requirements

This project does not require Leave to Construct approval.

B. Project Evaluation Criteria (Refer to Pages 20-21 in OEB Chapter 5 Requirements)

Primary Project Drivers

Veridian received a plant relocation request from the Region of Durham to move its distribution equipment to permit the widening of Kingston Road from Dixie to Liverpool.

Secondary Project Drivers

No significant secondary drivers for this project are present.

Project Priority

The project is required to meet obligations under law or Code.

Veridian Capital Project Tracking and Reporting Template

Project Benefits

System Operation Efficiency and Cost Effectiveness

No material effect is expected from this project.

Customer Value

No material effect is expected from this project.

Reliability

No material effect is expected from this project.

Safety

No material effect is expected from this project.

Cyber-security and Privacy

No material effect is expected from this project.

Coordination and Interoperability

No material effect is expected from this project.

Economic Development

No material effect is expected from this project.

Environmental Benefits

No material effect is expected from this project.

C. Category-specific requirements for each project/activity (Refer to Pages 22 to 25 in OEB Chapter 5 Requirements)

Additional Information – System Renewal Projects

[Note: Omit for System Access and System Service Projects]

Asset Performance Objectives

[For asset(s) in question, provide information on expected asset performance (e.g., rate of outages, availability rate, etc.) and describe maintenance protocols intended to optimize asset life.]

Condition of Assets

[Provide a detailed statement of the condition of the assets to be replaced, noting the source of information (asset condition assessment, field inspection, etc), age of the assets and typical life expectancy of assets, factors which may have hastened deterioration, and performance record of the assets.]

Consequences of Asset Failure

[Provide quantitative information on the number of customers (by class, where possible) affected by asset failure, frequency and duration of outages caused by asset failure, and risk of asset failure.

Explain any safety consequences that may exist. Also note qualitative impacts such as criticality of load, customer dissatisfaction with historical outages, greater-than-average customer requirements for reliability and power quality (e.g., specialized manufacturing), customer access to backup supplies.]

Veridian Capital Project Tracking and Reporting Template

Timing and Priority

[Apart from the information above re risk and consequence of asset failure, discuss any other factors affecting the timing/priority of the project. Explain the priority of this project relative to other projects. For projects involving large scale replacement of existing assets over several years, explain the factors influencing the rate of asset replacement. Refer if appropriate to Project Alternatives Assessment below.]

O&M Consequences

[Provide the expected (quantitative) impact on O&M of both doing the project (reduced O&M expected) and not doing the project (steady or increasing O&M expected).

Identification and Assessment of Project Alternatives

[Note: this section may vary considerably in length and complexity depending on the project in question. Two types of analysis are required by the OEB:]

Deferral of Project

[Provide information on the risks, costs, and benefits of deferring the project. Risks would pertain to how risk of asset failure increases with time (e.g., sharply, significantly, moderately). Costs could include incremental costs caused by catastrophic asset failure (including safety, if applicable), customer outage costs, other factors causing costs to increase if project deferred. Benefits would include the avoided cost of not doing the project now.]

Alternative Projects

[Either]

No technically viable and/or economically feasible alternatives to the proposed project were available because [provide brief explanation].

[Or]

[Identify and describe in reasonable detail one to three plausible or possible alternative approaches to achieving the same objectives as the proposed project, explaining the process used to generate alternatives and the criteria by which alternatives were evaluated. Where possible, provide quantitative information on costs of alternatives, or qualitative (directional) information on relative cost levels. Explain why candidate alternatives were rejected (e.g., lifecycle costs were higher; design not acceptable to customer or authorities; technical requirements not met or technical characteristics were inferior; safety characteristics inferior, etc.)

If the project could be configured as a like-for-like replacement (to current standards), but has added features intended to produce other benefits, compare costs and benefits of just the like-for-like replacement to those for the enhanced project that is proposed. This could include a discussion of savings realized by including the enhancement at the time the other work is done versus doing the enhancement work separately.]

Additional Information – System Access Projects

[Note: Omit for System Renewal and System Service Projects]

Veridian Capital Project Tracking and Reporting Template

Timing and Priority

[Given that System Access projects are mandatory to begin with, discuss any further factors or requirements pertaining to in-service dates etc. This will likely refer to plans of external parties (customers, developers, road authorities).]

Customer and Third Party Preferences

[Either]

No (other) customer or third party preferences were expressed in connection with this project.

[Or]

[Discuss preferences or requirements of customers or third parties, apart from timing issues already noted above, affecting the project. Examples could include municipal undergrounding requirements, phasing for residential or other subdivisions, etc.]

Other Planning Objectives

[Either]

No other planning objectives materially affected this project.

[Or]

[If secondary drivers of the project were identified above, refer to the discussion of secondary drivers above.]

Final Economic Evaluation

[Either]

An Economic Evaluation was not applicable to this project.

[Or]

[Summarize results (total costs, capital contribution required) of the final economic evaluation.

Note: at the time of preparation, the final economic evaluation will likely not be available. Consider inserting initial estimate if available, and flag this section for completion after final economic evaluation available.

If cost sharing is in effect for equipment relocation, describe the results of the cost sharing protocol.]

System Impacts

[Either]

No material system impacts are created by this project.

[Or]

[Provide information on significant system impacts (e.g., need to install additional upstream capacity, etc.) arising from the project, their associated costs, and how those costs will be recovered (i.e.,

Veridian Capital Project Tracking and Reporting Template

except in the case of REG investments, costs would be recovered through Veridian distribution rates).

In the case of REG investments, identify the system impacts (e.g., modifications necessary to enable connection of REG) and what portion of costs are to be recovered from provincial ratepayers under the ‘Direct Benefits’ provisions of Section 79.1 of the OEB Act and Ontario Regulation 330/09. See Regulatory for guidance.]

Identification and Assessment of Project Alternatives

[Note: this section may vary considerably in length and complexity depending on the project in question.]

[Either]

No technically viable and/or economically feasible alternatives to the proposed project were available because [provide brief explanation].

[Or]

[Identify and describe in reasonable detail one to three plausible or possible alternative approaches to achieving the same objectives as the proposed project, explaining the process used to generate alternatives and the criteria by which alternatives were evaluated. Where possible, provide quantitative information on costs of alternatives, or qualitative (directional) information on relative cost levels. Explain why candidate alternatives were rejected (e.g., lifecycle costs were higher; design not acceptable to customer or authorities; technical requirements not met or technical characteristics were inferior; safety characteristics inferior, etc.)]

Additional Information – System Service Projects

[Note: Omit for System Access and System Renewal Projects]

[Note: Many items specified in Chapter 5 filing requirements for System Service projects should already have been covered above under project benefits.]

Identification and Assessment of Project Alternatives

[Note: this section may vary considerably in length and complexity depending on the project in question. Two types of analysis are required by the OEB:]

Deferral of Project or Doing Nothing

[Provide information on the risks, costs, and benefits of deferring or not doing the project. Risks would pertain to how risk of capacity shortage or other adverse impacts increases with time (e.g., sharply, significantly, moderately). Costs could include incremental costs caused by catastrophic asset failure due to overloading (including safety, if applicable), customer outage costs, other factors causing costs to increase if project deferred. Benefits would include the avoided cost of not doing the project now.]

Alternative Projects

[Either]

Veridian Capital Project Tracking and Reporting Template

No technically viable and/or economically feasible alternatives to the proposed project were available because [provide brief explanation].

[Or]

[Identify and describe in reasonable detail one to three plausible or possible alternative approaches to achieving the same objectives as the proposed project, explaining the process used to generate alternatives and the criteria by which alternatives were evaluated. Where possible, provide quantitative information on costs of alternatives, or qualitative (directional) information on relative cost levels. Explain why candidate alternatives were rejected (e.g., lifecycle costs were higher; design not acceptable to customer or authorities; technical requirements not fully met or technical characteristics were inferior; safety characteristics inferior, etc.)



SEC – 3

Reference: [Appendix B]

Question:

Please provide any information used by the Applicant in benchmarking of costs for projects similar to the two ICM projects, or advise that no benchmarking was carried out.

Response:

Please see Elexicon's response to OEB Staff-3(b) and OEB Staff-10(b).



SEC – 4

Reference: [Appendix B, p.6]

Question:

- a) Please provide a detailed capital projects table in the form established in the Board’s Appendix 2-AA (normally applicable for cost of service applications), for 2022 and the previous four years, including all capital projects (i.e. not excluding merger-related projects).

Response:

Elexicon Energy Inc.’s (“Elexicon”) capital programs table in the form of Appendix 2-AA for 2022 and the previous four years has been filed as an attachment to this response.

- b) Please identify all projects in the table that are merger related (for example the CIS consolidation and upgrades).

Response:

Material merger related projects included with Appendix 2-AA include:

2020		
	• Great Plains Upgrade and Consolidation	\$0.7MM
2021		
	• CIS Consolidation	\$1.0MM
2022		
	• SCADA Upgrade	\$0.6MM

File Number: 0
Exhibit:
Tab:
Schedule:
Page:
Date:

Appendix 2-AA Capital Projects Table

Projects	2018	2019	2020	2021 Bridge Year	2022 Test Year
Reporting Basis	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS
SYSTEM ACCESS					
A1 - Road Relocation	4.80	3.64	4.75	23.05	5.54
Region of Durham BRT Road Relocation	0.00	0.00	0.00	0.00	5.30
A2 - Connection of New Services	8.85	15.77	14.95	8.94	12.88
A3 - Feeder Expansion	0.69	0.53	2.68	8.85	2.32
A4 - Metering	0.97	0.97	1.24	1.84	1.33
A5 - Customer Requested Work	0.65	0.51	1.42	2.00	0.10
Sub-Total	15.97	21.43	25.04	44.68	27.47
SYSTEM RENEWAL					
R1 - Substation Renewal	3.44	7.52	2.97	7.08	9.40
R2 - Renewal Programs-Rebuilds	5.28	5.47	2.60	5.65	5.30
R3 - Renewal Programs-Poles	1.91	6.48	1.57	1.20	2.40
R4 - Renewal Programs-Distribution Transformers	2.06	0.85	0.48	1.08	1.30
R5 - Renewal Programs-Switches & Switchgears	1.65	1.92	1.80	1.32	1.53
R6 - Renewal Programs-Others	0.67	0.45	1.13	0.95	0.77
R7 - Renewal Programs-Reactive	2.42	2.28	2.33	1.87	1.84
R8 - Voltage Conversion-Reliability	0.00	0.43	0.69	0.53	0.90
Sub-Total	17.43	25.40	13.56	19.67	23.44
SYSTEM SERVICE					
S1-Substations Growth & Expansion	0.12	5.65	0.64	0.00	40.76
S2-Substation Upgrades	0.80	0.16	0.00	0.00	0.00
S3-Standards Equipment Reliability and Compliance	0.27	0.27	0.33	0.30	0.30
S4-Feeder Enhancement	0.00	0.06	0.00	0.00	0.00
S5-System Reliability Improvements	1.23	1.01	1.02	1.12	1.74
Sub-Total	2.42	7.15	1.98	1.42	42.81
GENERAL PLANT					
P1 - Facilities	0.92	1.12	0.79	3.58	0.74
P2 - Fleet	0.71	2.10	0.80	1.86	1.41
P3 - Information Technology	1.57	1.95	4.31	6.46	4.16
P4 - Tools & Equipment	0.87	0.49	0.16	0.16	0.15
P5 - Intangibles	0.00	0.65	0.02	0.00	0.00
Sub-Total	4.08	6.31	6.08	12.06	6.46
Miscellaneous	0.00	0.00	0.00	0.00	0.00
Total	39.90	60.29	46.66	77.83	100.18
Less Renewable Generation Facility Assets and Other Non-Rate-Regulated Utility Assets <i>(input as negative)</i>					
Total	39.90	60.29	46.66	77.83	100.18

Notes:

Planned projects in the years 2018 and 2019 have been reassigned to the program breakdown as defined by Elexicon. Whereas the total annual gross expenditures aligns to 2-AB of the DSP, the breakdown of CAPEX by investment category may not align between the two appendices since Appendix 2-AB is based on the expenditure categorization used by the legacy Whitby Hydro Electric Corporation and Veridian Connections Inc.

1 Please provide a breakdown of the major components of each capital project undertaken in each year. Please ensure that all projects below the materiality threshold are included in the miscellaneous line. Add more projects as required.

2 The applicant should group projects appropriately and avoid presentations that result in classification of significant components of the capital budget in the miscellaneous category.

The capital projects table is representative of the gross expenditures equating to the total expenditures found in 2-AB.



SEC – 5

Reference: [Appendix B, p.9]

Question:

Please provide a calculation of the most recent achieved ROE for the VRZ separately.

Response:

The most recently achieved ROE calculated for Veridian Rate Zone (“VRZ”) was 9.21% (2018). Subsequent to the merger and formation of Elexicon (April 2019), it is only practical to calculate ROE for the merged entity.



SEC – 6

Reference: [Appendix B, p.11]

Preamble:

SEC notes that “the recent 2020 IRRP coincident load forecast for Whitby TS T1/T2 (27.6 kV) shows that for 2018 and 2019, the projected load from the 2016 report has not materialized.”

Question:

a) Please explain the lower than forecast load in the past years. Please provide details with respect to how the lower load forecast will impact the capital and operating costs of the Applicant going forward.

Response:

For an explanation of the lower than forecast load in prior years, please see Ellexicon Energy Inc.’s (“Ellexicon”) response to OEB Staff-4. As is explained in that response, if Seaton TS is not constructed as proposed, based on the most up-to-date and best available information, Ellexicon expects to exceed the Limited 10-day Rating (“LTR”) of the Whitby TS 27.6 kV system in 2023.

Upon review, Ellexicon had discovered that there was a typographical error in the Distribution System Plan (“DSP”).

“the recent 2020 IRRP coincident load forecast shows....” should have read
“the recent 2020 RIP coincident load forecast shows....”

The reference material is the 2020 Region Infrastructure Plan (“RIP”) published by Hydro One Networks Inc. (“HONI”) in 2020 (DSP, Appendix C). The Integrated Regional Resource Plan (“IRRP”) is a separate document published by the IESO in 2016.



The actual load is lower than the forecasted load due to delays in the Seaton area residential developments. Please see Elexicon's response to OEB Staff-4 for a detailed discussion regarding load forecast differences.

The lower load forecast for Whitby TS 27.6 kV does not have a significant impact to capital and operating costs. The majority of load growth for Whitby TS 27.6 kV is attributed to the Seaton area development. Since the cost of infrastructure expansion to supply Seaton is contributed by the Seaton developers, a delay in the project does not affect Elexicon's other capital and operating expenditures.



SEC – 7

Reference: [Appendix B, p.17]

Question:

- a) Please confirm that the proposed in-service date of Seaton TS is December 31, 2022. If that is not correct, please advise the correct in-service date.**

Response:

Please see Elexicon's response to Staff-5d.

- b) If the in-service date is after the 2022 summer peak, please explain why it is being brought into service in 2022 rather than in the spring of 2023.**

Response:

The expected in-service date for Seaton TS will be after the expected 2022 summer system loading peak. The following considerations are guiding Elexicon Energy Inc. ("Elexicon") to bring the new station into service in late 2022:

- a. Current system capacity forecasts indicate that capacity to feed Seaton area customers from current supply sources will be exhausted in 2023 (see Elexicon's response to Staff-4). Elexicon's practice to prudently and conservatively manage its distribution system has led to the decision to pursue an in-service date for Seaton TS in 2022, in order to ensure there is no jeopardy to its ability to supply customers in the project area. Should demand increase faster than expected due to continued economic expansion post-COVID, or project area customers experience abnormally hot weather in early 2023, Elexicon would be forced to spend additional capital to bring feeders from surrounding transformer stations in a very rushed manner to supply Seaton



- load if the station was not yet in-service. Failing to do that, Elexicon would be faced with the risk of not being able to serve new loads or potentially be forced to operate its distribution system in an overloaded state.
- b. An arbitrary delay of the project in service date to 2023 would be subject to change orders from the project's General Contractor and corresponding cost increases. Elexicon estimates this could be upwards of \$0.1MM, depending on exact timing and specific impacts.
 - c. Potential cost penalties could come from Hydro One and its work to prepare for the Seaton TS's connection to the transmission system work including tap line construction and project specific protection and control work. Elexicon estimates this could be upwards of \$0.1MM depending on exact timing and specific impacts.
 - d. Bringing Seaton TS into service in 2022 versus 2023 will also minimize project carrying costs that will be borne by Elexicon customers. A delay to the Seaton TS in-service date of mid-2023 would add between \$0.6MM and \$0.8MM in carrying costs to the project, depending on interest rates and exact timing of the delay.



SEC – 8

Reference: [Appendix B-1, p.1]

Question:

Please provide a table showing all retirements as a result of the BRT ICM project. Please calculate the impact on 2022 rate base, depreciation and cost of capital of those retirements.

Response:

The following table outlines the retirements as a result of the BRT ICM project.

Table SEC-8: BRT Retirements

Description	OEB#	Useful Life	Cost	Annual Depreciation	Years Depreciated	Amount Not Depreciated
Underground Conduit	1840	60	\$ 857,000	\$ 14,283	21	\$ 557,050
Underground Conductor & Devices-Conductor	1845	40	\$ 1,639,000	\$ 40,975	21	\$ 778,525
			\$ 2,496,000	\$ 55,258		\$ 1,335,575

Using the full undepreciated value of the retired assets, the impact of the assets retired as a result of the BRT project are as follows:

- Rate base of \$1.3M
- Annual depreciation of \$55K
- Cost of capital of \$88K (Debt of \$38K plus Equity of \$50K)



SEC – 9

Reference: [Appendix B-1, p.13]

Preamble:

With respect to the BRT Relocation project, SEC notes “As the BRT Relocations work is initiated by external parties, the biggest risk to the project is external delays to starting the work. This risk is completely outside of Elexicon’s control.”

Question:

a) Please explain, with supporting documents, EEI’s budgeting method and EEI’s budget estimate confidence level considering the uncontrollable factors noted above.

Response:

Please see Elexicon Energy Inc.’s (“Elexicon”) response to Staff-10 with respect to budgeting and estimating for the BRT project.

Please see Elexicon’s response to Staff-12 with respect to the status and schedule of the BRT project.

The construction schedule/timelines are consistent with those identified in the project business case submitted as part of Elexicon’s Distribution System Plan (“DSP”). In order to have confidence that a System Service project like BRT, which can potentially be impacted by factors beyond Elexicon’s control, will commence on time and as per schedule, Elexicon requires a financial commitment from the customer in the form of a purchase order (“PO”) to finalize design work and a written confirmation of the schedule. Elexicon has received correspondence from the Region of Durham, indicating that this project must be completed in 2022. On September 1st 2021, Elexicon received a PO for this project from the Region of Durham.



b) Please confirm that the timelines of the project are as set forth in the business case, or provide a new forecast of timelines and in-service date.

Response:

Please refer to response to a) above and the response to Staff-12.



SEC – 10

Reference: [Appendix B-2, p.12]

Question:

With regard to the Seaton TS project, please provide a revised Table 7 including 2020 actuals and 2021 year-to-date actuals.

Response:

SEC-10 Table-1: Updated Table 7 to include 2020 actuals and 2021 year-to-date actuals

Year	2015	2016	2017	2018	2019	2020	2021 YTD*	Total Additions 2015-2021
Year-End Pickering Residential Customers	28,779	29,050	29,471	29,957	30,249	30,732	30,963	2184
Year-End Pickering households	30,815	30,985	31,465	31,990	32,250	33,525	**	2710

* 2021 year-to-date include customer count from January to September 2021.

** 2021 year-to-date Pickering household figure is not yet published by Region of Durham



SEC – 11

Reference: [Appendix C, p.2]

Question:

Please provide a detailed calculation showing the dollar impact on the proposed ESM threshold of the proposal to use 9.43% ROE rather than the current Board-approved ROE level for electricity distributors.

Response:

In the Decision and Order in the Merger, Acquisitions, Amalgamations, and Divestitures (“MAADs”) Application between Veridian Connections Inc. and Whitby Hydro Electric Corporation (EB-2019-0236) (“Elexicon MAADs Decision”) the Ontario Energy Board (“OEB”) made the following findings:

“The OEB orders that the ESM proposal be filed by December 31, 2021 in accordance with prevailing OEB policy at that time. This requirement is consistent with that made in the Decision and Order in the Alectra Utilities amalgamation proceeding.”¹

In compliance with the Elexicon MAADs Decision, Elexicon Energy Inc. (“Elexicon”) filed its ESM proposal on August 18, 2021, with the pre-filed evidence in this proceeding (the “Elexicon Application”).²

As mentioned in the Elexicon MAADs Decision, in Alectra Utilities Corporation’s (“Alectra”) MAADs Decision (EB-2016-0025/EB-2016-0360) the OEB similarly ordered

¹ EB-2016-0025/EB-2016-0360

² EB-2021-0015 – 2022 Incentive Rate-Making Application dated August 18, 2021, Appendix C.



Alectra to the file plans for an ESM by December 31, 2019.³ Subsequently, in its 2020 Incentive Regulation Mechanism Application (the “Alectra Application”) (EB-2019-0018), Alectra filed its ESM proposal and sought an order from the OEB approving its ESM proposal for the 2022-2026 period.⁴

Therefore, consistent with the Alectra Application, Elexicon is making an amendment to the relief sought in its pre-filed evidence filed on August 18, 2021⁴ by adding the request for an order approving Elexicon’s Earning Sharing Mechanism proposal for the 2024-2028 period.

The information requested in this interrogatory is not relevant to the matters at issue in this application.

The information sought in this interrogatory relates to the methodology being used to calculate the ROE under the ESM proposal. The OEB in the Partial Decision and Interim Rate Order to the Alectra Application (“Alectra Decision”) found that:

“The methodology in calculating an approved ROE for a newly consolidated entity, or any allocations that would be required between rate zones in determining deemed and achieved returns, are factors that are not discussed in either the MAADs Policy, MAADs Handbook, or in the approval of the Alectra Utilities amalgamation.

The OEB will defer these matters for consideration in Alectra Utilities’ first rate application following the completion of its 2022 fiscal year (the first year

³ EB-2016-0025/EB-2016-0360, Decision and Order dated December 8, 2016, at page 30.

⁴ EB-2021-0015 – 2022 Incentive Rate Making Application, at page 6.



that the ESM is in effect for). The OEB expects Alectra Utilities to address these issues in its pre-filed evidence related to the ESM at that time.”⁵

Consistent with the Alectra Decision, Elexicon believes that this issue is best dealt with in the first rate application following the completion of its 2024 fiscal year (the first year for which the ESM would be in effect).

⁵ EB-2019-0018 – Partial Decision and Interim Rate Order dated December 12, 2019, at page 43.



SEC – 12

Reference: [Appendix C, p.3]

Question:

- a) Please confirm that, in the calculation of ROE under the Applicant's proposal, both the revenues and the costs (including incremental capital and operating costs, interest, depreciation, and PILs associated with the BRT project and the Seaton TS) will be excluded from the calculation.

Response:

The information requested in this interrogatory is not relevant to the matters at issue in this application.

The information sought in this interrogatory relates to the methodology being used to calculate the ROE under the Earnings Sharing Mechanism ("ESM") proposal.

As mentioned in response to SEC-11, in its Partial Decision and Interim Rate Order to the Alectra Utilities Corporation's 2020 Incentive Regulation Mechanism Application (EB-2019-0018) ("Alectra Decision"), the Ontario Energy Board ("OEB") found that:

"The methodology in calculating an approved ROE for a newly consolidated entity, or any allocations that would be required between rate zones in determining deemed and achieved returns, are factors that are not discussed in either the MAADs Policy, MAADs Handbook, or in the approval of the Alectra Utilities amalgamation.

The OEB will defer these matters for consideration in Alectra Utilities' first rate application following the completion of its 2022 fiscal year (the first year



that the ESM is in effect for). The OEB expects Alectra Utilities to address these issues in its pre-filed evidence related to the ESM at that time.”¹

Therefore, consistent with the Alectra Decision, Elexicon Energy Inc. (“Elexicon”) believes that matters related to the methodology in calculating an approved ROE for Elexicon is best dealt with in the first rate application following the completion of its 2024 fiscal year (the first year for which the ESM would be in effect).

b) If not confirmed, please provide more details on the Applicant’s proposal with respect to inclusion or exclusion of costs and revenues.

Response:

Not applicable.

¹ EB-2019-0018 – Partial Decision and Interim Rate Order dated December 12, 2019, at page 43.



Elexicon Energy Inc.

2022

IRM Rate Application
Interrogatory Response - CCC

EB-2021-0015 | November 8, 2021



CCC – 1

Reference: N/A

Question:

a) When did Elexicon make the Decision to file its ICM Application for the two projects?

Response:

Elexicon made the decision to file for the Seaton TS during the MAADs application and the BRT decision was made during the development of its Distribution System Plan ("DSP"), filed with the OEB, April 2021.

b) Please file all materials presented to the Board of Directors related to this Application and specifically with respect to the ICM projects.

Response:

Please see Elexicon's response to SEC-1



CCC – 2

Reference: N/A

Question:

Please provide the Board approved and actual ROE for the years 2014-2018 for the Whitby and Veridian rate zones. Please provide the Board approved and actual ROE for the years 2019 and 2020 for the merged entity.

Response:

The approved and actual regulatory rate of return on equity (“ROE”) for the years 2014-2018 are available in the published scorecards for Whitby Hydro Electric Corporation (“Whitby Hydro”) and Veridian Connections Inc. (“Veridian”). The data has been reproduced below.

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Veridian – approved	9.36%	9.36%	9.36%	9.36%	9.36%
Veridian – actual	10.61%	9.31%	9.28%	8.66%	9.21%
Whitby - approved	9.66%	9.66%	9.66%	9.66%	9.66%
Whitby – actual	13.89%*	10.43%	9.94%	10.46%	11.84%
	<u>2019</u>	<u>2020</u>			
Ellexicon – deemed **	9.43%	9.43%			
Ellexicon – actual	7.61%	6.80%			

* Whitby Hydro’s Scorecard Management Discussion and Analysis (MD&A) included further explanations related to the 2014 reported ROE data. For greater clarity, the following information was captured in the MD&A:



By definition, the Whitby Hydro regulatory ROE calculation is based on the revenue and cost structure in the approved 2011 Cost of Service application within an allowable range of +/- 3%. During 2016, the Ontario Energy Board (“OEB”) released a new template which allowed the calculation of ROE to be more closely reflective of the intended definition and as a result, be more accurately comparable against the approved ROE. On this basis, Whitby Hydro’s ROE for the three years of 9.94% (2016), and 10.46% (2017), and 11.84% (2018) are all well within the allowed threshold.

However, for 2014, Whitby Hydro disagrees with the presentment of ROE information on the scorecard matrix since those rates of return include items outside of the revenue and cost structures in the approved 2011 Cost of Service application. These elements are regulatory requirements and include lower taxes due to under recoveries in pass-through costs, however, inclusion of them in the ROE calculation distorts any comparability to approved ROE and allowable ranges.

While Whitby Hydro provided updated ROE calculations for 2014 (11.32%) based on the new template, the OEB did not allow Whitby Hydro to include this revised data in the Scorecard matrix. The OEB did however review information provided by Whitby Hydro and confirmed the ROE was materially affected by items such as the lower taxes and that the restated 2014 ROE numbers are appropriate and within the allowable range.

** For Scorecard purposes, the OEB has determined a methodology to calculate a deemed ROE calculation for a merged distributor.



CCC – 3

Reference: Ex. Appendix B - ICM

Question:

With respect to the two projects please provide the following:

a) The current expected in-service date;

Response:

Please see Elexicon's response to Staff-5 and Staff-12.

b) The proposed annual expenditures per year as per the DSP; and

Response:

Appendix 2-AA of the DSP shows the following gross annual expenditures per year for the two projects.

CCC-3 Table 1 – Proposed Gross Capital Expenditures

	2022
Seaton-TS	\$ 40.76MM
Hwy 2 BRT	\$ 5.30MM

c) The actual expenditures incurred to date.

Response:

Actual expenditures incurred up to October 27th, 2021 for the two projects are as follows:

- Seaton TS \$19.4MM
- Hwy 2 BRT \$ 0.7MM



CCC – 4

Reference: Ex. Appendix B/p. 1

Question:

Of all of its proposed capital projects please explain why Elexicon is seeking ICM treatment for the Bus Rapid Transit Project (BRT).

Response:

Please see Elexicon's response to OEB Staff-11.



CCC – 5

Reference: Ex. B-2 – Business Case/p. 9

Question:

a) Please provide a complete list of all of the risks that could delay the in-service date of the Seaton TS Project.

Response:

Elexicon has filed a copy of the risk register for this project as part of the response to OEB Staff-5 (e). Risks that could delay the in-service date of the Seaton TS project are Risk ID numbers - 2, 12, 17, 19, 21 and 24.

b) Please explain how Elexicon intends to mitigate those risks.

Response:

Please see the risk register filed as Attachment A to OEB Staff-5.



CCC – 6

Reference: Ex. DSP – p. 184-187 – Table 5.4-12

Preamble:

In the DSP Elexicon has set out a Variance Analysis Summary for System Access Expenditures.

Question:

Please recast this Table to include Board Approved Amounts.

Response:

Veridian's last DSP was filed with its 2014 Cost of Service rate application (EB-2013-0174), in which the OEB approved a settlement proposal that was agreed to by all parties. In the settlement proposal all parties agreed that reduced capital expenditures of \$25.487MM were appropriately paced and prioritized, and would result in just and reasonable rates for customers. However, there was nothing apportioning this reduced amount to the categories of system access, renewal, service, or general plant; rather it was the entire capital envelope that was agreed to by the parties and the resulting settlement agreement was accepted by the OEB. Likewise, Whitby Hydro last rebased in 2010/2011 and also had an OEB approved settlement, and did not file a DSP as they were not required at this time. As such, the OEB has not approved amounts specific to System Access and they can therefore not be provided.



Preamble:

Elexicon and its predecessor utilities have had a longstanding issue with significant underspending System Access Projects relative to planned spending. The contributing factors are largely delays and scope changes, often drive by external circumstances.

Question:

Given this pattern, how can the OEB be assured that the BRT Project will be completed on time and on budget?

Response:

Please see Elexicon's response to Staff-10, Staff-12 and SEC-9.



CCC – 7

Reference: Ex. DSP – p. 183 Table 5.4-11

Preamble:

Elexicon is significantly ramping up its capital spending in 2022 relative to historical periods.

Question:

Please explain the why Elexicon has not be able to better pace its investments as required by the RRFE. To what extent has Elexicon made efforts to reduce the capital spending in other areas in light of the need for the Seaton TS.

Response:

Please see Elexicon's response for OEB Staff-6.



Elexicon Energy Inc.

2022

IRM Rate Application Interrogatory Response - VECC

EB-2021-0015 | November 8, 2021



VECC – 1

Reference: Appendix B– Incremental Capital Module Page 12

Preamble:

Elexicon indicates the results of online (262 customers) and phone (600) surveys indicate that majority of customers (71%, or 613 of the 862 customers surveyed respectively) find the proposed investment in the Transformer Station (Seaton TS – preferred alternative 1) very appropriate or somewhat appropriate. Additionally, the results of the online and phone surveys indicate that majority of customers (78%, or 668 of the 862 customers surveyed respectively) when asked if they had any thoughts specific to the project answered “unsure/ none”, indicating the general approval and lack of concerns.

Question:

Please provide the survey questions, responses and the summary report of the survey.

Response:

Elexicon provides its DSP Customer Engagement Report from Brickworks Communications as Attachment A to this response.

A summary of the online survey results can be found on pages 5-17, and a summary of the telephone survey results can be found on pages 18-32 of the report.

All online survey questions and responses can be found on pages 33-42, and all telephone survey questions and responses can be found pages 43-51 of the report.

Questions and responses specific to Seaton TS can be found on page 48 (Q20 and Q21), and those specific to BRT Hwy 2 can be found on page 49 (Q24 and Q25).

A background image of a red Elexicon Energy container, possibly a fuel tank or storage drum, with the company logo and name printed on it in white. The image is slightly blurred and has a white vignette effect.

Customer Engagement Report

Brickworks Communications
Updated February 2021

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Elexicon Energy **2021-2026 Distribution System Plan**

Background

Elexicon Energy commissioned Brickworks to oversee an engagement survey of its customers. The purpose of this survey process was to learn more about how Elexicon's investment plans can best reflect the needs and preferences of their customers. The information collected will be used to inform investment decision-making and may also be submitted to the Ontario Energy Board (OEB) as an input into their five-year Distribution System Plan (DSP).

There were two main approaches used in this process, including an open online survey forum which resulted in N=262 completes and a random telephone survey of N=600 customers. Customers were assured that all responses to this survey would be confidential, and only overall or aggregate results would be reported.

Reporting Notes

The survey questions were designed by Elexicon and Brickworks. The role of Oraclepoll Research Ltd was to field the online and telephone surveys and report on the findings.

This report contains an executive summary of the results from both the telephone and online components, as well as the results by question. Findings are presented in the order that they were asked in each survey.

Methodology & Logistics – Online Survey

Survey Method

All surveys were completed online using Computer Assisted Web Interviewing (CAWI). This was a self-selection survey where respondents connected via a hyperlink to the survey site to complete their interview. Elexicon posted the link on their website homepage, and promoted the survey using e-blasts to their customer base.

Study Sample

In total, N=263 customers completed online questionnaires.

Logistics

Surveys were completed online between October 26th and December 13th, 2020.

Confidence

It is not customary to assign online self-selection samples a margin of error. However, a probability sample of N=262 has a margin of error or is considered accurate $\pm 6.0\%$, 19/20 times.

Methodology & Logistics – Telephone Survey

Study Sample

Elexicon provided Brickworks with a database of their residential and business customers to be surveyed. A total of N=524 residential customers, N=70 small business customers, and N=6 large businesses were randomly selected from the database and surveyed by telephone, using person-to-person live telephone interviewing.

Respondents were screened to ensure that they were 18 years of age or older, an Elexicon customer, and were one of the persons either at the business or residence that was a decision maker as related to reviewing utility bills and making payments.

Survey Method

The survey was conducted using computer-assisted techniques of telephone interviewing (CATI) and random number selection. A total of 20% of all interviews were monitored, and Oraclepoll management supervised 100%.

Logistics

Telephone interviews were completed between November 20th and December 4th, 2020. Initial calls for the residential component were made between the hours of 5 p.m. and 9 p.m. Subsequent call backs of no-answers and busy numbers were made on a (staggered) daily rotating basis up to 5 times (from 10 a.m. to 9 p.m.) until contact was made. In addition, telephone interview appointments were attempted with those respondents unable to complete the survey at the time of contact. At least one attempt was made to contact respondents on a weekend. Calls to business customers were first made from 8:30 a.m. to 5:30 p.m. during weekdays. There was at least one follow up call after 5:30 p.m. and one on a weekend. In addition, telephone appointments were accepted and made as per the respondent's time preference.

Confidence

The margin of error for the N=600-respondent survey is $\pm 4.0\%$, 19/20 times.

Online Survey Results



Part A

Elexicon Energy Part A: Initial Qualification and Segmentation

Survey participants were shown background information about Elexicon. They were also told that a main objective of the online poll was to learn how Elexicon's investment plans can best reflect the needs and preferences of its customers.

"Firstly, please confirm that you reside in a household or work in an organization associated with an Elexicon customer account."

Yes N=262 100%

"What is the municipality associated with the Elexicon customer account?"

Whitby	29%
Ajax	23%
Pickering	16%
Belleville	8%
Clarington	7%
Gravenhurst	7%
Port Hope	4%
Brock	3%
Scugog/Port Perry	3%
Uxbridge	<1%

The initial set of questions were demographic. First respondents were screened to ensure they were Elexicon customers, then they were probed about where they live, the client segment they belonged to, and if they are responsible for paying the electricity bill.

"To provide better context for your responses, please confirm whether you are completing this survey as a Residential Customer or a Business Customer."

Residential N=262 100%

"In your <household/business> what is your role with respect to paying for the cost of electricity? Are you primarily responsible, partially responsible, or not responsible for paying the electricity bill?"

I am primarily responsible for paying my household's electricity bill	N=233	89%
I share the responsibility for paying my household's electricity bill	N=29	11%

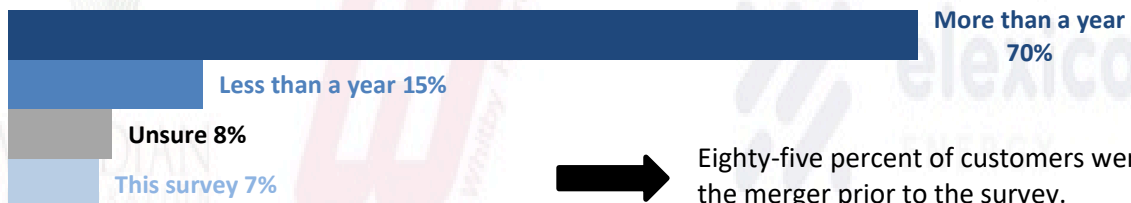


Elexicon Energy Part B: Main Survey

General Questions

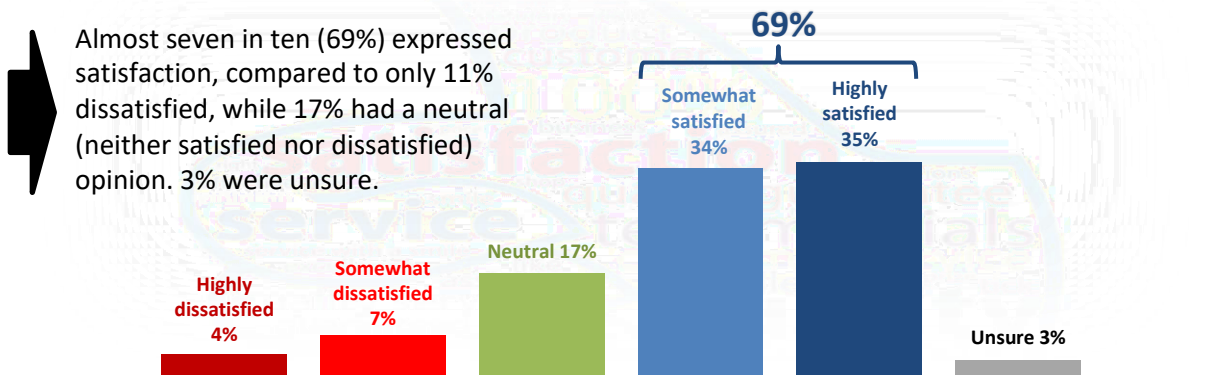
Next, online participants were presented with an explanation of the three major cost components of their electricity bill: Generation, Transmission and Distribution – and the portion retained by Elexicon. They were advised that the information collected in the survey related only to their local electricity distributor Elexicon, after which questions were asked.

"When did you first become aware of the merger between Whitby Hydro and Veridian to create Elexicon?"



Eighty-five percent of customers were aware of the merger prior to the survey.

"Overall, how satisfied are you with the services Elexicon provides you with?"



Comments were accepted at the end of the question and results have been sorted into the categories below.

"In your own words, what are the reasons for your current level of satisfaction or dissatisfaction with Elexicon as expressed in your last response?"



No problems / satisfied	23%	Service has improved	2%
Unsure	21%	Website problems / issues	2%
Reliable / stable service	13%	Simplify billing / payment methods	1%
Poor service / interruptions / outages	11%	Billing problems	1%
Hydro rates are high / expensive	9%	Good customer service	1%
No change	4%	The transition has been seamless	1%
Old / outdated infrastructure	3%	Need alternative energy options	1%
Dislike time of use / simplify / change	2%	Cannot compare due to the monopoly	<1%
No notice for planned outages	2%	Lack of follow up	<1%
No experience / new client / too soon	2%	Give rebates	<1%
Poor customer service / long waits	2%		

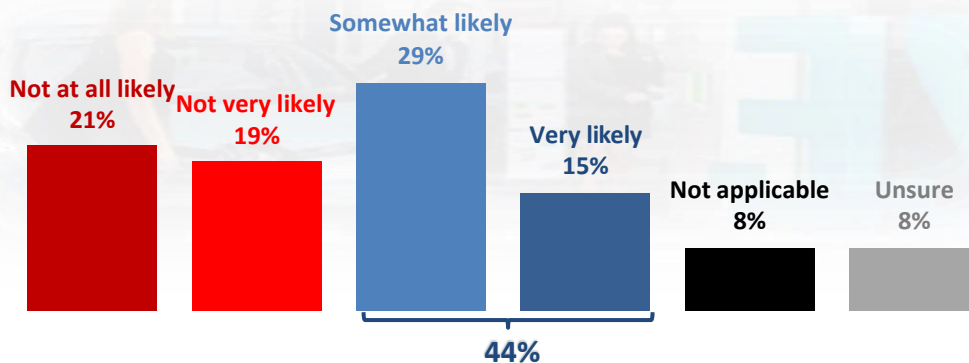
"Please rate your level of agreement with the following statements using a scale from one (strongly disagree) to five (strongly agree)."

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	Unsure	Not applicable
"The amount of my monthly electricity bill is a major expense item for my family and requires me to go without some other important priorities"	25%	20%	27%	21%	7%	1%	-
"When I had specific questions or requests for Elexicon or its predecessors, I was satisfied with how they were resolved"	3%	9%	19%	18%	20%	-	31%



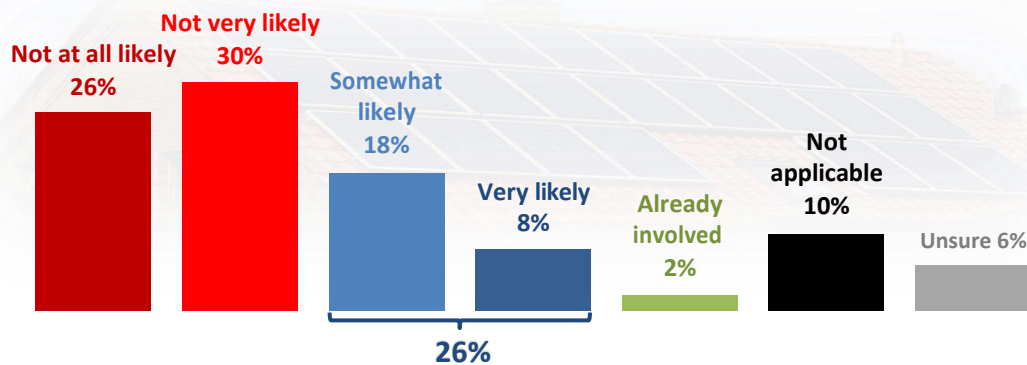
Twenty-eight percent agreed the cost of their bill creates some form of hardship. Total agreement, or being satisfied with how questions or requests were resolved, is 38%, compared to only 12% that disagreed (dissatisfied), while 19% had a neutral opinion. 31% answered not applicable or had no experience.

"If you plan to purchase a vehicle in the next five years, how likely are you to consider purchasing an electric vehicle?"



Interest in EV's is solid at 44%, with 29% somewhat and 15% very likely to consider a purchase.

"How likely are you to become involved in self-generation of electricity at your place of residence over the next five years (for example, by installing solar panels)?"



Slightly more than a quarter or 26% said they are somewhat (18%) or very likely (8%) to become involved in self generation.

Two questions about outages over the past year were asked, the first about how many times the power has been out, and second related to the length of time the outages lasted.

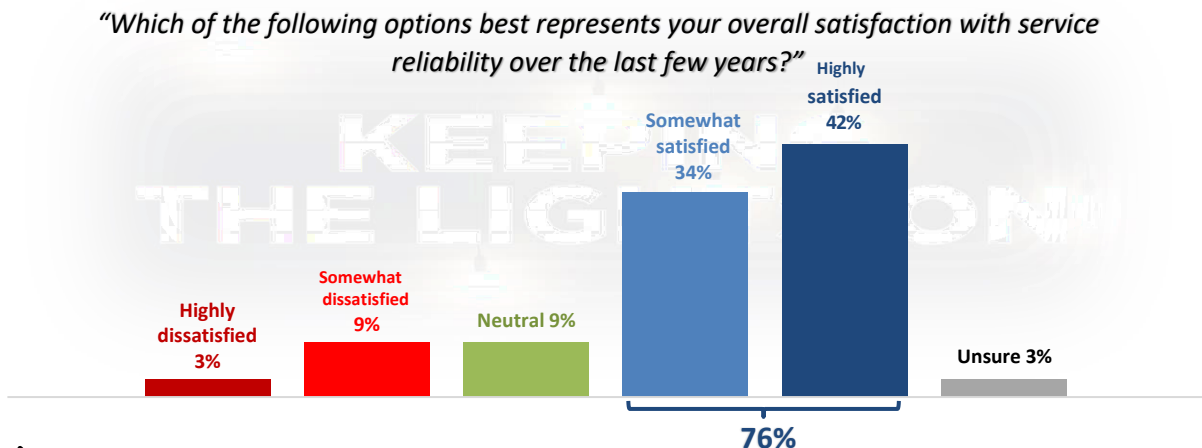
"In 2019, an average Exlexicon customer experienced 1.28 outages. Thinking back to your experience over the past year, how many times has the power been out at your home to the best of your recollection?"

0	8%
1	14%
2	29%
3	13%
More than 3	24%
Not Sure	11%

"In 2019, Exlexicon customers experienced power outages lasting an average of 1.63 hours. Thinking back to your experience, please estimate how long your power outages lasted on average? Please select from the following options based on your best estimate:"

Under 30 minutes	20%
Under 1 hour	22%
Between 1 and 2 hours	22%
Longer than 2 hours	21%
Not Sure	15%

Customers were then asked about reliability starting with an overall satisfaction question.



➔ Seventy-six percent are satisfied or very satisfied with service reliability.

"When power outages do occur, which aspect of them has been most inconvenient for you?"

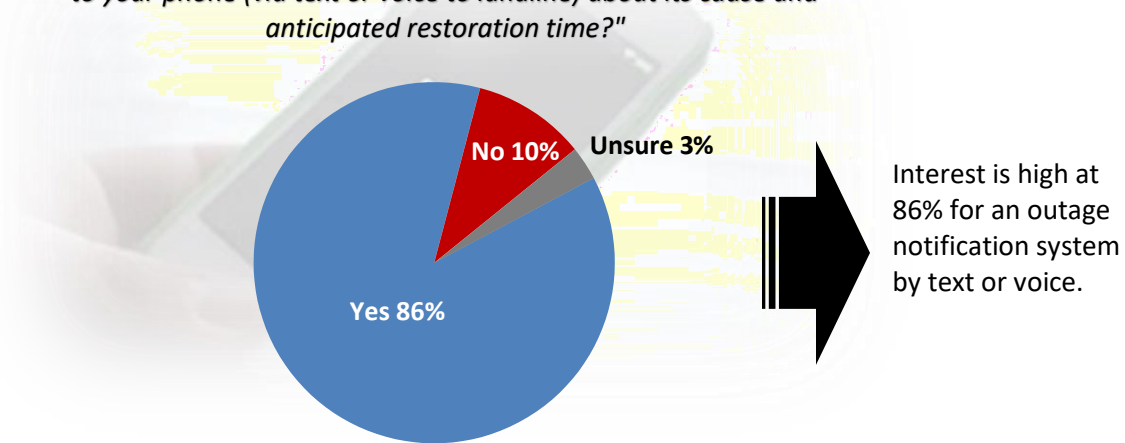
How long the outages have lasted	44%
How often the outages have occurred	20%
Not Sure	16%
Impact it has on my electronics / computers	7%
None / no inconveniences	4%
Getting information from Exlexicon / contact with	3%
Both how often & how long	3%
Timing / when they occur	2%
No heat / no cooling / appliances	1%

"When there is a power outage, how do you interact with Exlexicon Energy?"

I check the outage map online	37%
I do not take any steps	30%
I phone the outage number posted on the website	19%
I check Twitter	6%
Telephone call	3%
No experience	2%
I use both Twitter and Map	1%
Radio	1%
Unsure	1%

➔ The length of an outage is of most concern to 44%, followed by how often they occur (20%). When asked how they interact with Exlexicon during an outage, 37% check the map online and 19% phone the number on the website, while three in ten do not take any actions.

"Please indicate your level of interest in the following: When an outage occurs, are you interested in receiving notifications sent to your phone (via text or voice to landline) about its cause and anticipated restoration time?"



"To manage the impact of power outages, Elexicon replaces aging infrastructure, trims trees near powerlines, and invests in equipment that helps restore service faster. Which of the following statements best represents your views on what level of reliability Elexicon should target?"

Elexicon should spend more on reliability, but less in other areas that also affect customers, if this can help avoid some bill increases.	37%
Elexicon should maintain current reliability levels, even if it gradually increases my monthly electricity bill in the long term.	32%
Elexicon should invest more to improve reliability, and I would accept a larger increase to my monthly bill in the long term to achieve this.	12%
Not Sure	11%
Maintain reliability & do not raise prices	4%
Elexicon should invest less in outage prevention to reduce the impact of future bill increases, even if it potentially means more and longer outages for myself and others.	3%
Provide better service overall	1%

➡ There is a split of opinion with the two most selected options being spending more on reliability and less on other areas (to avoid some bill increases) as well as maintaining current reliability, even if it increases monthly bills in the long term.

"Elexicon can prevent more outages caused by aging equipment if it proactively replaces more equipment before it fails. Another option is to wait and replace equipment only after it fails, which potentially causes more service interruptions and leads to extra costs such as staff overtime. Which of the following options best describes your views on this trade-off?"

Elexicon should replace more equipment before it fails, spending more today to prevent future outages and keep bill increases predictable.	81%
Not Sure	10%
Elexicon should wait until more equipment fails, reducing its spending today, even if this causes more future outages and unpredictable bill increases down the road.	5%
Maintenance on a schedule & no rate increases	4%
Invest in better equipment	1%

➡ A clear majority of 81% feel equipment should be replaced before it fails.

“Elexicon’s top spending priority is always to keep its power system and operations safe. With its budget staying nearly flat through 2029, Elexicon will face tough trade-offs when selecting among other investment priorities.”

“Please choose two of the following objectives that you think Elexicon should focus its efforts on, in addition to keeping the system safe and accommodating new growth in the coming years.”

	First mention	Second mention	Combined
Improving the grid’s resilience to major weather events, like storms, etc.	28%	31%	30%
Preparing the grid for new types of uses, like EV’s & renewable generation	23%	11%	17%
Investing now in things that will help reduce rate increases after 2029	13%	20%	16%
Minimizing the impact of power outages	7%	19%	13%
Helping customers manage their electricity use	10%	10%	10%
Reducing the environmental impact of Elexicon’s operations	12%	5%	8%
Improving power quality	5%	2%	4%
Addressing customer requests faster and more efficiently	2%	1%	2%

➡ While improving the grid’s resilience to major events is the number one choice at 30%, results are close for second, with 17% naming preparing the grid for new uses and 16% investing now in things that will help reduce rate increases after 2029.

➡ **45% of customers who are dissatisfied with reliability listed minimizing outage impacts in their top two priorities.**

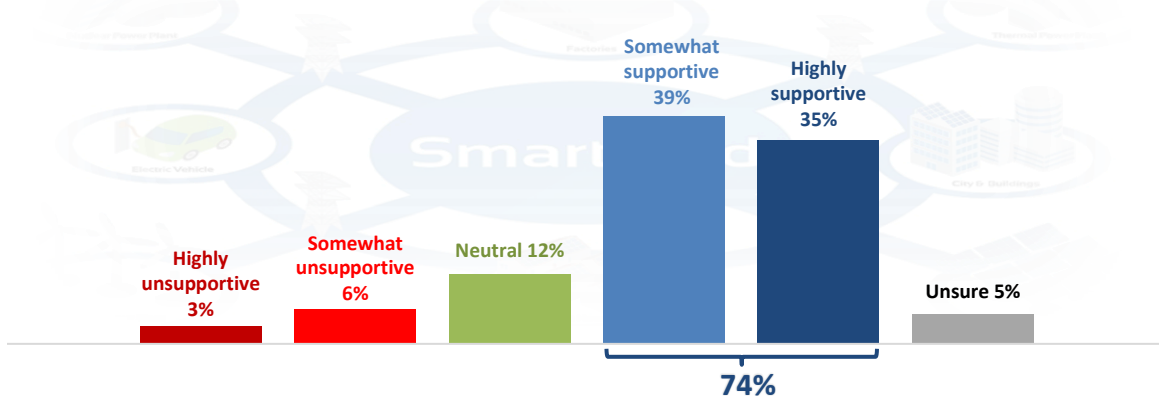
“Aside from investments to support customer growth, Elexicon currently plans to spend about 73% of its remaining five-year budget on managing reliability, 22% on efficiency, health, and safety of its own operations, and 5% on the technical upkeep of its power grid.

Do you consider this plan satisfactory, or would you prefer to allocate more budget towards one of those three categories above the others?”

I am satisfied with the planned allocation based on what I know	50%
I would prefer to spend more on the technical upkeep of the power grid & less on the other two	18%
Not Sure	16%
I would prefer to spend more on reliability and less on the other two	8%
I would prefer to spend more on efficiency, health, & safety of operations and less on other two	7%

➡ Half are satisfied with the planned allocation, while 16% were unsure. There are 18% that want more spent on technical upkeep, with the remaining responses divided between more spent-on reliability and more on efficiency, health, and safety of operations.

“Part of Elexicon’s future planning involves investing in grid management technologies that will help it manage the impact of more Electric Vehicles, Renewable Generation, and Energy Storage. Like with all budgeting decisions, investing in new technology today requires making trade-offs. How supportive are you of Elexicon’s intent to invest in future technologies at this time?”



➡ Support for investing in new technologies is at nearly three-quarters or 74%.

Customers were presented with a description of rear-lot overhead power lines, the challenges they face, and the cost of conversion to underground lines. They were then asked the following two questions.

“To the best of your knowledge, does your place of <<residence>>/<<business>> currently receive power via a rear-lot line?”



“Elexicon has several options to consider for how it schedules the rear-lot conversion work. Which of the following options do you see as most preferred?”

Move lines underground and plan work geographically, finishing all work in one area before moving elsewhere. While concentrating the work in a single community for a shorter timeframe is less inconvenient to local residents, it could leave vulnerable rear-lot feeders in other communities unaddressed for longer.	38%
Not Sure	23%
Move lines underground and plan work according to worst performing areas. This spreads the work across Elexicon’s service territory over time but may mean that there may be multiple construction-related disruptions.	22%
Maintain the status quo – keep the overhead lines in the rear lots, replacing them as they fail. While budgets can be used elsewhere, it will leave area customers vulnerable to longer than average outages.	17%

➡ Only 17% want to maintain the status quo and 23% were unsure as to a preferred option. There were 38% that want to move the lines underground and work geographically. 22% that also want to move the lines underground, but work on the worst performing areas.



Exlexicon Energy Part C: Incremental Capital Module Survey

ICM Project #1: New Pickering Area Transformer Station

Next, online participants were provided with background information about three projects that Exlexicon plans to seek approval for additional rate increases. They were informed that two projects are driven by population growth, and the third is needed to sustain operations in the Belleville area.

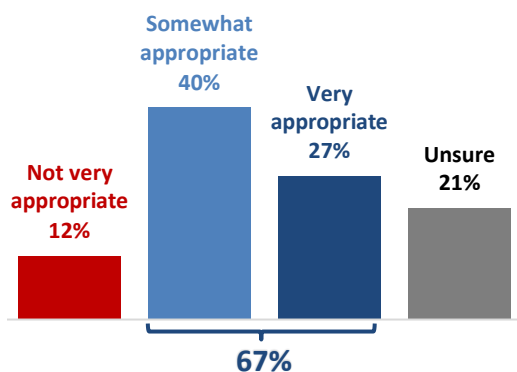
Exlexicon will request special rate increases for these projects since it cannot finance them along with its other budgetary priorities. These requests are reviewed by the OEB through a process known as the Incremental Capital Module (ICM).

The first project is a large new Transformer Station in the Pickering area, required to support the residential and commercial growth that is projected to add as many as 32,000 new customers over the next 20 years. Exlexicon estimates that to avoid system capacity shortages, the station needs to be in service in 2022.

The project is expected to cost about \$40 million, which amounts to an approximate:

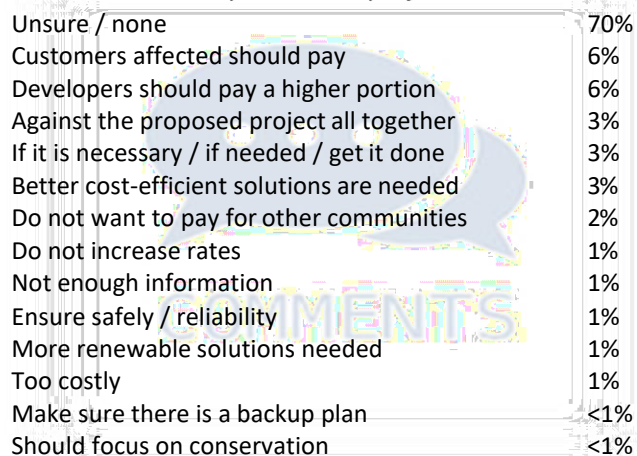
- \$1.45 - \$1.85 bill increase per month starting in 2022 for the average **residential customer** in the Veridian rate zone.
- 2.90 - \$3.60 bill increase per month starting in 2022 for the average **small business customer** in the Veridian rate zone.
- \$280.95 - \$343.40 bill increase per month starting in 2022 for the average **large business customer** in the Veridian rate zone.

"To what degree do you consider the level of proposed investments in the Transformer Station appropriate?"



➔ Two-thirds consider the level of investment appropriate (somewhat & very), only 12% do not feel it appropriate and 21% were undecided.

"Do you have any thoughts you'd like to share with respect to this project?"



➔ While most (70%) did not have comments to share, those with opinions tended to cite the belief that customers in the communities affected and developers should pay for costs or a larger portion of the price. Some mentions reflected opposition, others the need to get things done. There were also those that felt other options should be pursued.

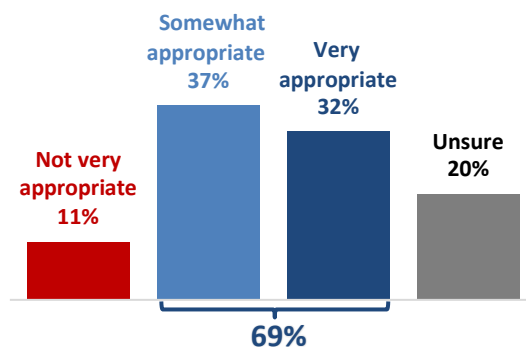
ICM Project #2: Accommodating the Move of the Belleville Operations Centre

The second project for funding is a new Operations Centre in Belleville to accommodate staff and equipment involved in providing customer service and responding to local power outages. The lease on the existing facility is set to expire in 2021 and cannot be renewed. Having considered all feasible options, Elexicon determined that owning a new facility is the most cost-effective option for customers in the long term.

The project is expected to cost about \$2.6 million, which amounts to an approximate

- \$0.10 - \$0.15 bill increase per month starting in 2022 for the average **residential customer** in the Veridian rate zone.
- \$0.25 - \$0.30 bill increase per month starting in 2022 for the average **small business customer** in the Veridian rate zone.
- \$2.6 million, which amounts to an approximate \$18.35 - \$23.50 bill increase per month starting in 2022 for the average **large business customer** in the Veridian rate zone.

"To what degree do you consider the level of proposed investments in the Operations Centre appropriate?"



Sixty-nine percent consider the level of investment appropriate. This compares to a low 11% that do not, while 21% are unsure.

"Do you have any thoughts you'd like to share with respect to this project?"

Unsure / none	79%
Customers / communities affected should pay	4%
It is a required investment / reasonable / needed	3%
Refurbish an existing building	2%
Should come from reserve funds not customers	2%
Against project all together	2%
Lack of information to make an informed decision	2%
Build it smart / keep future growth in mind	1%
Compare leasing versus new build	1%
Customers should not have to pay	1%
Lease / rent building	1%
Should have been done years ago	1%
Proposed budget seems too low	<1%
Municipality should help finance	<1%
Savings should be passed onto the customer	<1%
Business / developers should pay	<1%
Should be mortgage financed	<1%

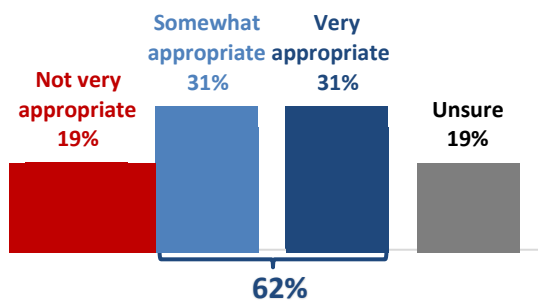
Almost eight in ten had no comment and among those that did, there was a mix of those in support, opposed, or not wanting to pay, and others suggesting alternative solutions for the build and payment.

ICM Project #3: Underground System Relocation in Pickering to Enable Regional Bus Rapid Transit

To enable construction of dedicated Rapid Transit Bus Lanes in the Hwy #2 corridor in Pickering, Elexicon is required to relocate existing underground feeder infrastructure located in the right of way intended for the bus lanes. Elexicon and its customers are responsible for a portion of this cost, estimated to be \$2.8 million. While performing this work, Elexicon will have an opportunity to replace or upgrade any equipment, as necessary.

- The project's cost is equivalent to an approximate \$0.10 - \$0.15 bill increase per month starting in 2022 for the average **residential customer** in the Veridian rate zone.
- The project's cost is equivalent to an approximate \$0.25 - \$0.30 bill increase per month starting in 2022 for the average **small business customer** in the Veridian rate zone.
- The project's cost is equivalent to an approximate \$27.95 - \$35.70 bill increase per month starting in 2022 for the average **large business customer** in the Veridian rate zone.

"Do you consider the level of investment proposed for this underground infrastructure project to be very appropriate, somewhat appropriate, or not appropriate?"



Slightly more six in ten said the level of investment is appropriate, less than two in ten not appropriate, and an equal number did not know.

"Do you have any thoughts you'd like to share with respect to this project?"

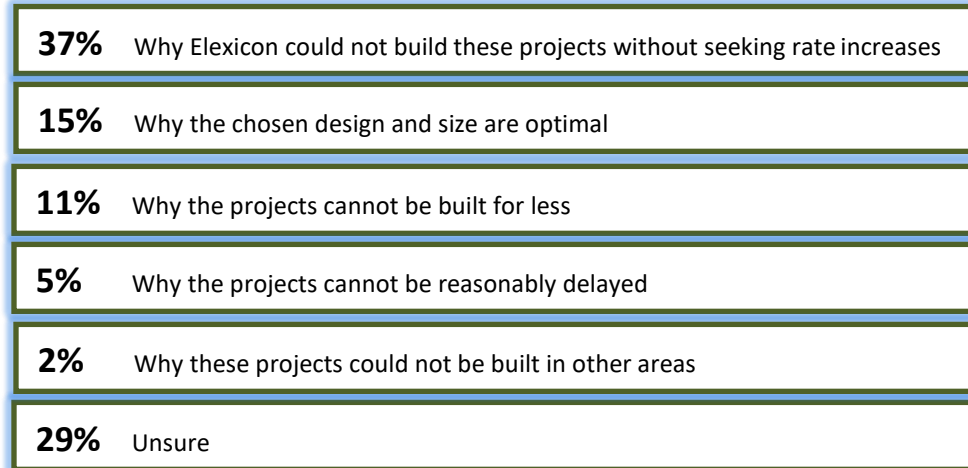
Unsure / none	74%
Residents / communities affected should pay	6%
Should be a priority	3%
Project should be covered by taxpayers	3%
Project not a priority	3%
Need more information / unclear	2%
Costs should be covered by transit users	2%
Municipality should pay	2%
Should be paid for by investors	1%
Will improve reliability	1%
Poor planning	1%
Project should be completed quickly as possible	1%
Disagree with project	1%
Will raise rates	<1%
Should be Elexicon's responsibility	<1%



Nearly three-quarters had no comments, but most of those that did (14%) referenced the belief that costs should be incurred by users, those affected, by ratepayers, or municipalities.

In the final question about the three ICM projects, respondents were asked which of five options presented would give them the most confidence that Elexicon is acting in their best interest.

“What type of information about the three proposed ICM projects would give you the most confidence that Elexicon is acting in the best interest of their customers in mind?”

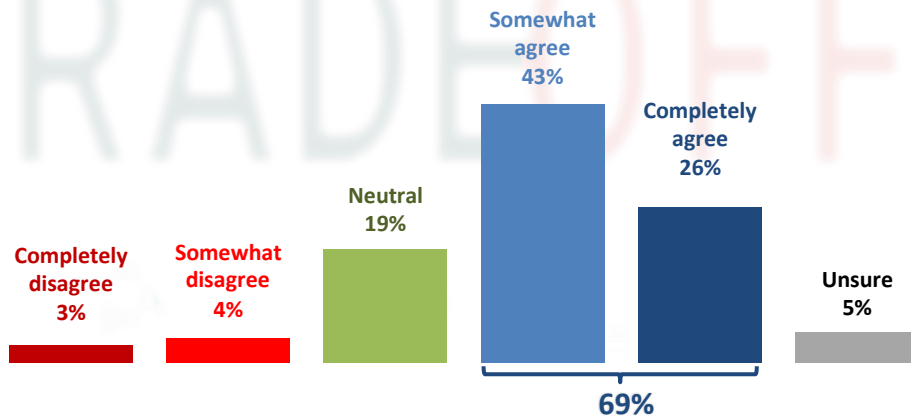


Most named was why Elexicon could not build these projects without seeking rate increases, followed by why the chosen designs and sizes are optimal and then why they cannot be built for less. Almost three in ten answered do not know or were unsure.

Part D

Elexicon Energy Part D: Concluding Observations

"As a result of taking this survey, would you agree that you have a better appreciation of the planning trade-offs that Elexicon must consider when making investment plans?"



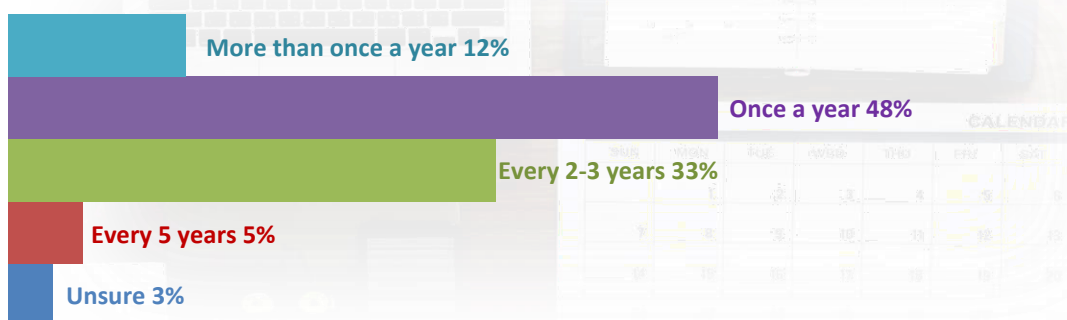
An almost seven in ten majority somewhat or completely agreed that they have a better appreciation of the planning trade-offs that Elexicon needs to consider when making investment plans. This compares to only 7% that somewhat or completely disagreed, while 19% gave a neutral (neither agree nor disagree) response, and 5% were unsure.

Customers were asked about their preferred method to have Elexicon consult with them on similar topics. Below are the percentage of counts or the responses for each category, revealing that by far, most favour online surveys.

"In the future, what is your preferred method to have Elexicon consult with you about topics similar to what we discussed?"

Online Surveys	93%
Live Online Presentations and Q&A Sessions	13%
In-Person Townhall Meetings	8%
In-Person Focus Groups	5%
Phone Surveys	3%
Mail	1%
Bill inserts	1%
General email	<1%
Newspaper	<1%

"How often should Elexicon engage its customers on matters such as those captured in this survey?"



The percentage of customers that want to be engaged on a yearly basis (once & more than once a year) is 60%, while a third named every 2-3 years. Only 5% stated every five years and 3% were unsure.

"Do you have any other comments, questions, or suggestions that you would like Elexicon to consider as it develops its capital plans for the coming years?"

Unsure / none	N=218	83%	Support upgrades	N=1	<1%
Lower rates	N=12	5%	Create jobs	N=1	<1%
Promote Green Energy	N=5	2%	Move to online payments only	N=1	<1%
Limit increases to most needed projects	N=2	1%	Improve customer service	N=1	<1%
Removal of overhead wires	N=2	1%	Would like data from Smart Meter	N=1	<1%
Invest in an outage communication system	N=2	1%	Capital costs should've been pre-planned	N=1	<1%
App to monitor usage	N=2	1%	Upgrades should not impact customers	N=1	<1%
More tools to help manage electricity use	N=2	1%	Upgrades too costly	N=1	<1%
Keep the utilities public / local	N=2	1%	Should not pay for new subdivisions	N=1	<1%
Amount and length of outages too high	N=1	<1%	Trees are being cut down unnecessarily	N=1	<1%
Support Electric vehicles	N=1	<1%	More outreach needed	N=1	<1%
Stop all investment in Green Energy	N=1	<1%			
Communities should cover costs	N=1	<1%			

Telephone Survey Results



Part A

Elexicon Energy Part A: Initial Qualification and Segmentation

Telephone respondents were read background information about Elexicon. They were also told that a main objective of the online poll was to learn how Elexicon's investment plans can best reflect the needs and preferences of its customers.

"Firstly, please confirm that you reside in a household or work in an organization associated with an Elexicon customer account."

Yes N=600 100%

"What is the municipality associated with the Elexicon customer account?"

Whitby	29%
Ajax	18%
Pickering	17%
Belleville	10%
Clarington	8%
Gravenhurst	7%
Port Hope	5%
Brock	3%
Scugog	2%
Uxbridge	2%

The initial questions were demographic. First respondents were screened to ensure they were Elexicon customers, then they were probed about where they live, the client segment they belonged to, and if they are responsible for paying the electricity bill.

"To provide better context for your responses, please confirm whether you are completing this survey as a Residential Customer or a Business Customer."

Residential	N=524	87%
Small Business (monthly electricity bill below \$2,500)	N=70	12%
Large Business (monthly electricity bill above \$2,500)	N=6	1%

"In your <household / business> what is your role with respect to paying for the cost of electricity? Are you primarily responsible, partially responsible, or not responsible for paying the electricity bill?"

I am primarily responsible for paying my household's electricity bill	N=466	78%
I share the responsibility for paying my household's electricity bill	N=58	10%
I am the person responsible for managing my organization's electricity bill	N=42	7%
I am the person overseeing the management of my organization's electricity bill	N=34	6%

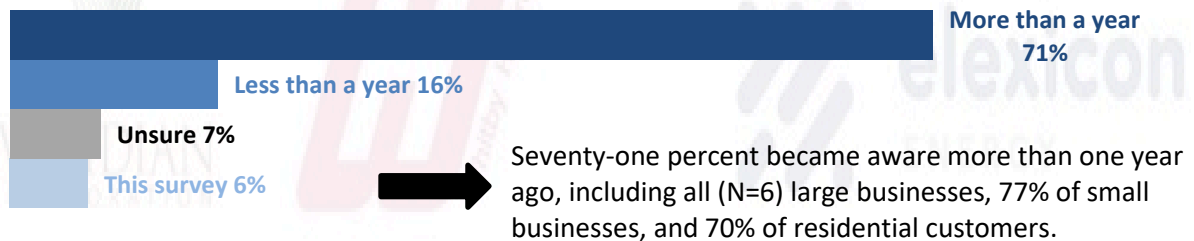


Exlexicon Energy Part B: Main Survey

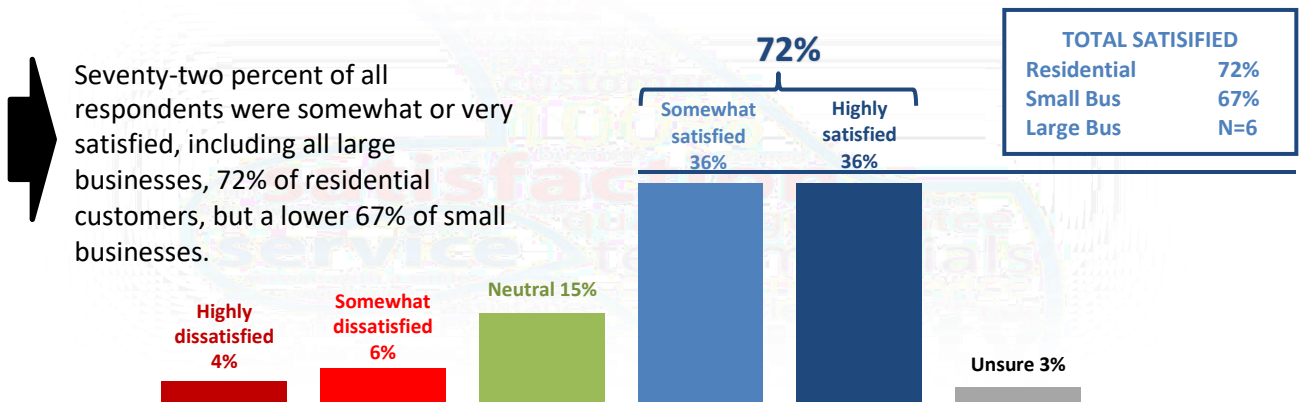
General Questions

Respondents were next read an explanation of the three major cost components of their electricity bill: Generation, Transmission and Distribution – and the portion retained by Exlexicon. They were advised that the information collected in the survey related only to their local electricity distributor Exlexicon, after which questions were asked.

"When did you first become aware of the merger between Whitby Hydro and Veridian to create Exlexicon?"



"Overall, how satisfied are you with the services Exlexicon provides you with?"



Comments were accepted at the end of the question and results have been coded into the categories below.

"In your own words, what are the reasons for your current level of satisfaction or dissatisfaction with Exlexicon as expressed in your last response?"



Unsure / none	30%	Good customer service	1%
No problems / satisfied	24%	Poor customer service /long waits	1%
Reliable / stable service	14%	No notice for planned outages	1%
Hydro rates are high / expensive	13%	Simplify billing / payment methods	1%
Poor service / interruptions / outages	10%	Dislike time of use / simplify / change	1%
No experience / new customers	2%	Lack of follow up	1%
Old / outdated Infrastructure	2%	Billing problems	<1%

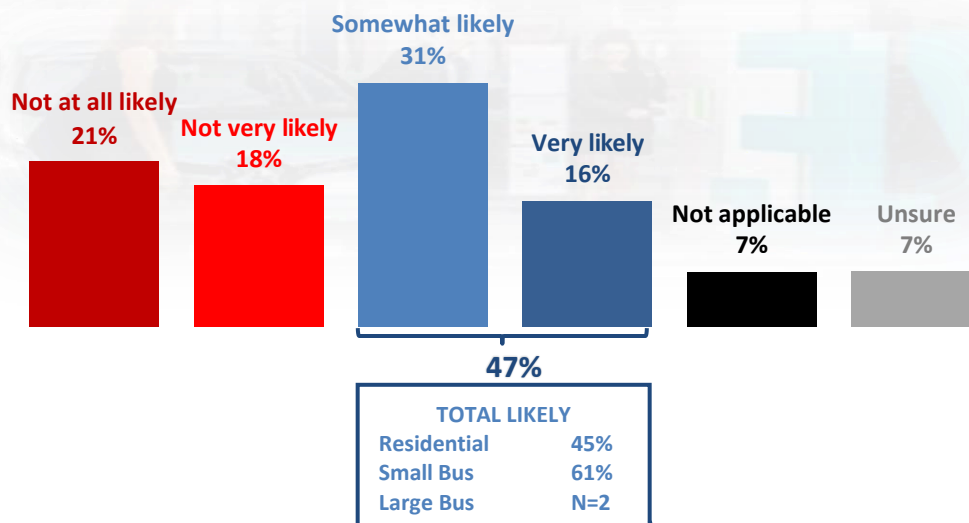
"Please rate your level of agreement with the following statements using a scale from one (strongly disagree) to five (strongly agree)."

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	Unsure	Not applicable	TOTAL AGREE BY SEGMENT
"The amount of my monthly electricity bill is a major expense item for my family / business and requires me to go without some other important priorities"	20%	24%	22%	24%	9%	1%	-	Residential 32% Small Bus 43% Large Bus N=1
"When I had specific questions or requests for Elexicon or its predecessors, I was satisfied with how they were resolved"	4%	8%	19%	21%	20%	1%	27%	Residential 40% Small Bus 45% Large Bus N=5



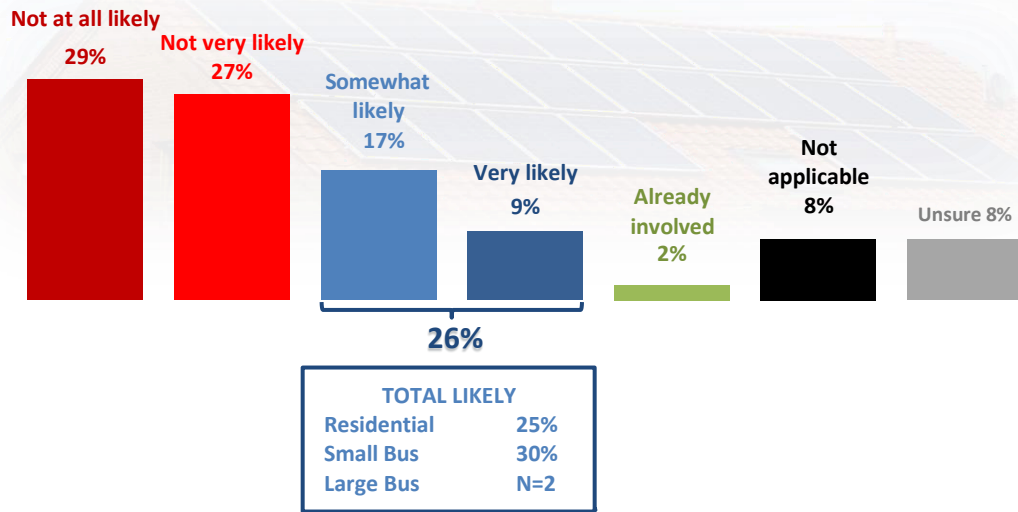
Thirty-three percent of all respondents agreed their monthly bill is a major expense affecting priorities, with small businesses most likely to agree at 43%. More than four in ten or 41% agreed or were satisfied with how their questions were resolved, compared to only 12% that disagreed or were not satisfied – with businesses being more satisfied (total agree).

"If you plan to purchase a vehicle in the next five years, how likely are you to consider purchasing an electric vehicle?"



There is strong overall interest at 47%, with those in the small business cohort showing the strongest interest.

"How likely are you to become involved in self-generation of electricity at your <residence>>/<business> over the next five years (for example, by installing solar panels)?"



Twenty-six percent said they are somewhat (17%) or very likely (9%) to become involved in self-generation, with results higher among small businesses.

Two questions about outages over the past year were asked, the first about how many times the power has been out, and second related to the length of time they lasted.

"In 2019, an average Elexicon customer experienced 1.28 outages. Thinking back to your experience over the past year, how many times has the power been out at your <home / business> to the best of your recollection?"

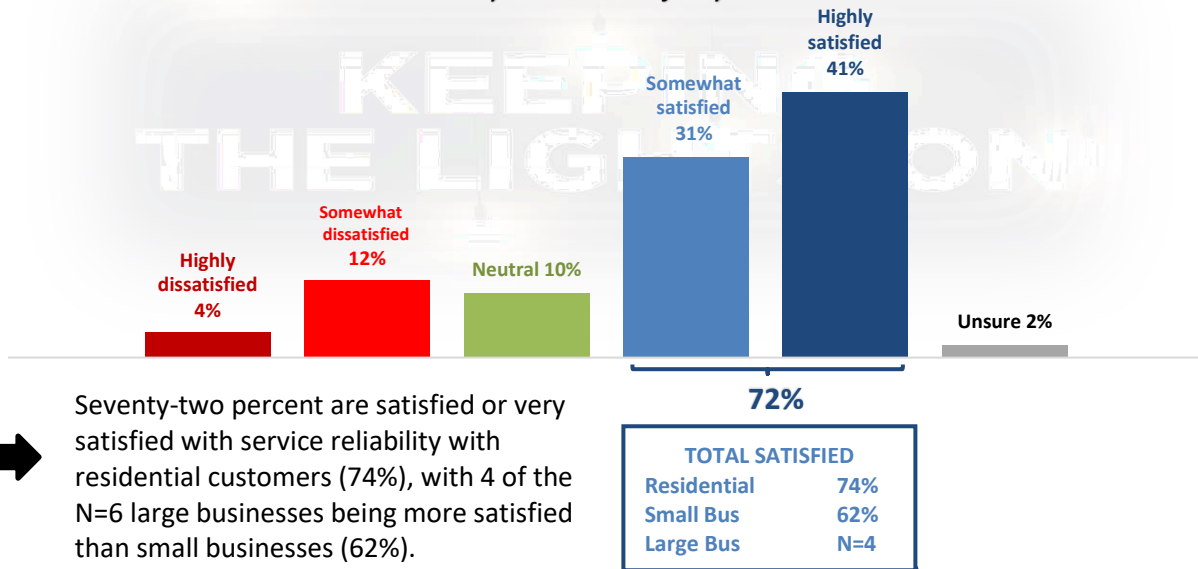
0	7%
1	15%
2	31%
3	14%
More than 3	26%
Not Sure	8%

"In 2019, Elexicon customers experienced power outages lasting an average of 1.63 hours. Thinking back to your experience, please estimate how long your power outages lasted on average? Please select from the following options based on your best estimate:"

Under 30 minutes	23%
Under 1 hour	21%
Between 1 and 2 hours	21%
Longer than 2 hours	25%
Not Sure	10%

Customers were next probed about reliability, starting with an overall satisfaction question. There were then asked two semi-open follow-ups about what most inconvenienced them during outages and how they interact with Elexicon during these events.

"Which of the following options best represents your overall satisfaction with service reliability over the last few years?"



Seventy-two percent are satisfied or very satisfied with service reliability with residential customers (74%), with 4 of the N=6 large businesses being more satisfied than small businesses (62%).

"When power outages do occur, which aspect of them has been most inconvenient for you?"

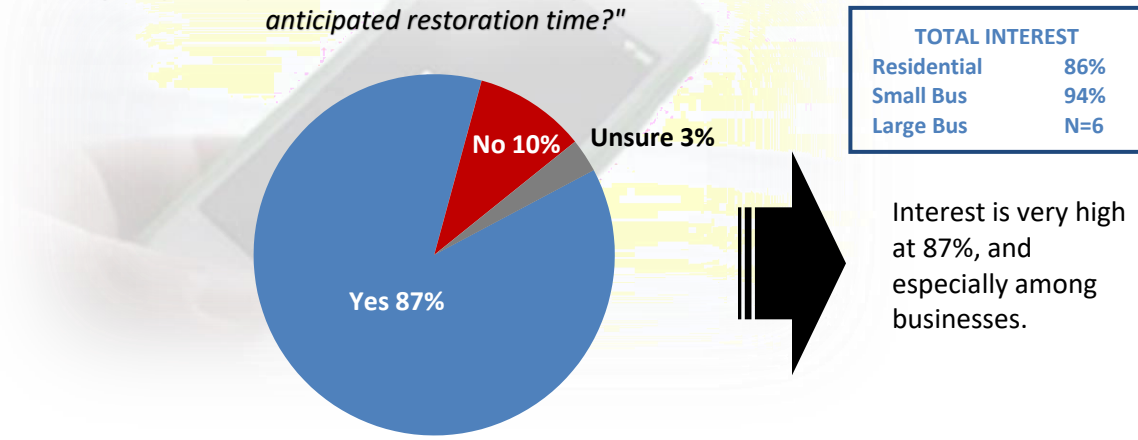
How long the outages have lasted	48%
How often the outages have occurred	19%
Not Sure	15%
Impact it has on my electronics / computers	8%
None / no inconveniences	4%
Both how often & how long	3%
Getting info from Elexicon / contact	2%
Timing / when they occur	1%

"When there is a power outage, how do you interact with Elexicon Energy?"

I check the outage map online	38%
I do not take any steps	29%
I phone the outage number posted on the website	21%
I check Twitter	6%
Telephone call	4%
Unsure	2%
No experience	1%
Radio	<1%

The length of an outage is of most concern to 48%, followed by how often they occur (19%). When then asked how they interact with Elexicon during an outage, 38% check the map online and 21% phone the number on the website, while an additional 4% just said a telephone call.

"Please indicate your level of interest in the following: When an outage occurs, are you interested in receiving notifications sent to your phone (via text or voice to landline) about its cause and anticipated restoration time?"



"To manage the impact of power outages, Elexicon replaces aging infrastructure, trims trees near powerlines, and invests in equipment that helps restore service faster. Which of the following statements best represents your views on what level of reliability Elexicon should target?"

Elexicon should spend more on reliability, but less in other areas that also affect customers, if this can help avoid some bill increases	38%
Elexicon should maintain current reliability levels, even if it gradually increases my monthly electricity bill in the long term	37%
Elexicon should invest more to improve reliability, and I would accept a larger increase to my monthly bill in the long term to achieve this	12%
Not Sure	10%
Maintain reliability and do not raise prices	3%
Elexicon should invest less in outage prevention to reduce the impact of future bill increases, even if it potentially means more and longer outages for myself and others	1%

➔ An almost equal number support spending more on reliability and less on other areas (to avoid some bill increases) and maintaining current reliability, even if it increases monthly bills in the long term.

"Elexicon can prevent more outages caused by aging equipment if it proactively replaces more equipment before it fails. Another option is to wait and replace equipment only after it fails, which potentially causes more service interruptions and leads to extra costs such as staff overtime. Which of the following options best describes your views on this trade-off?"

Elexicon should replace more equipment before it fails, spending more today to prevent future outages and keep bill increases predictable	85%
Not Sure	7%
Elexicon should wait until more equipment fails, reducing its spending today, even if this causes more future outages and unpredictable bill increases down the road	5%
Maintenance on a schedule and no rate increases	4%

➔ A very strong majority of 85% feel equipment should be replaced before it fails.

“Elexicon’s top spending priority is always to keep its power system and operations safe. With its budget staying nearly flat through 2029, Elexicon will face tough trade-offs when selecting among other investment priorities.”

“Please choose two of the following objectives that you think Elexicon should focus its efforts on, in addition to keeping the system safe and accommodating new growth in the coming years.”

	First mention	Second mention	Combined
Improving the grid’s resilience to major weather events, like storms, floods, or freezing rain	32%	30%	31%
Preparing the grid for new types of uses, like electric vehicles and renewable generation	22%	12%	17%
Investing now in things that will help reduce rate increases after 2029	12%	20%	16%
Minimizing the impact of power outages	6%	20%	13%
Helping customers manage their electricity use	11%	9%	10%
Reducing the environmental impact of Elexicon’s operations	11%	5%	8%
Improving power quality	4%	3%	4%
Addressing customer requests faster and more efficiently	2%	1%	2%

- ➡ Improving the grid’s resilience to major events is the number one, two, and combined choice. The next highest in terms of combined results is preparing the grid for new uses, followed by investing in things that will help reduce rate increases after 2029.
- ➡ **45% of customers who are dissatisfied with reliability listed minimizing outage impacts in their top two priorities.**

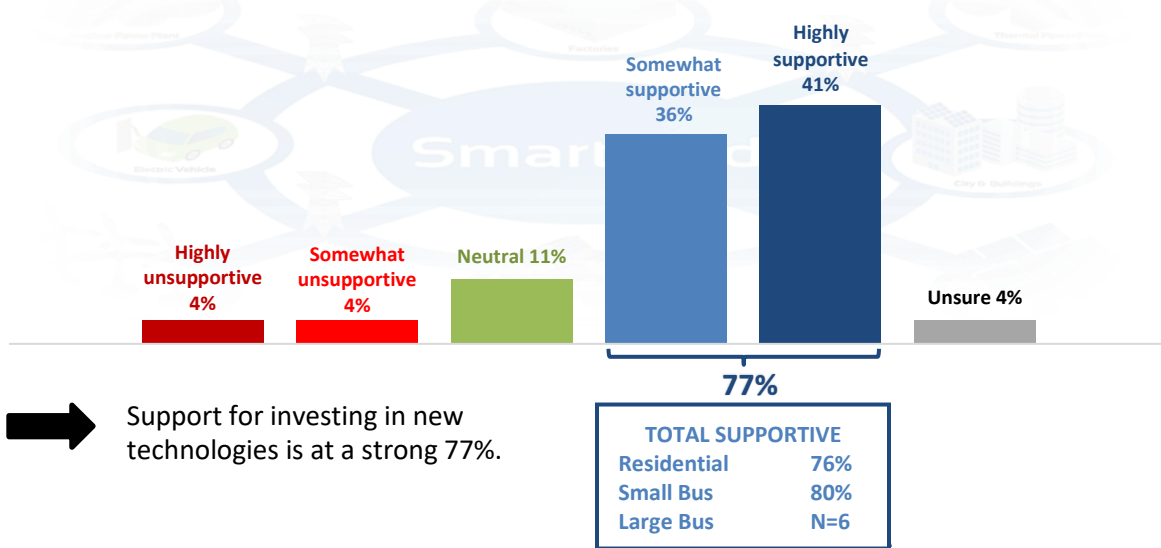
“Aside from investments to support customer growth, Elexicon currently plans to spend about 73% of its remaining five-year budget on managing reliability, 22% on efficiency, health, and safety of its own operations, and 5% on the technical upkeep of its power grid.”

“Do you consider this plan satisfactory, or would you prefer to allocate more budget towards one of those three categories above the others?”

I am satisfied with the planned allocation based on what I know	53%
I would prefer to spend more on the technical upkeep of the power grid and less on the other two	16%
Not Sure	14%
I would prefer to spend more on reliability and less on the other two	11%
I would prefer to spend more on efficiency, health, and safety of operations and less on the other two	6%

- ➡ A slim majority or 53% are satisfied with the planned allocation, next followed by those wanting more spent on technical upkeep (16%) and reliability (11%). Only 6% want more spent-on efficiency, health, and safety, while 11% were unsure.

“Part of Elexicon’s future planning involves investing in grid management technologies that will help it manage the impact of more Electric Vehicles, Renewable Generation, and Energy Storage. Like with all budgeting decisions, investing in new technology today requires making trade-offs. How supportive are you of Elexicon’s intent to invest in future technologies at this time?”



➔ Support for investing in new technologies is at a strong 77%.

Customers were read a description of rear-lot overhead power lines, the challenges they face, and the cost of conversion to underground lines. They were then asked the following two questions.

“To the best of your knowledge, does your place of <residence>/<business> currently receive power via a rear-lot line?”



“Elexicon has several options to consider for how it schedules the rear-lot conversion work. Which of the following options do you see as most preferred?”

Move lines underground and plan work geographically, finishing all work in one area before moving elsewhere. While concentrating the work in a single community for a shorter timeframe is less inconvenient to local residents, it could leave vulnerable rear-lot feeders in other communities unaddressed for longer.	39%
Move lines underground and plan work according to worst performing areas. This spreads the work across Elexicon’s service territory over time but may mean that there may be multiple construction-related disruptions.	24%
Maintain the status quo – keep the overhead lines in the rear lots, replacing them as they fail. While budgets can be used elsewhere, it will leave area customers vulnerable to longer than average outages.	22%
Not Sure	15%

➔ While no option received majority preference, most named was moving lines underground and working geographically, while the other two alternatives received roughly the same percentage of responses.



Elexicon Energy Part C: Incremental Capital Module Survey

ICM Project #1: New Pickering Area Transformer Station

Next, online participants were read background information about three projects that Elexicon plans to seek approval for additional rate increases. They were informed that two projects are driven by population growth and the third is needed to sustain operations in the Belleville area.

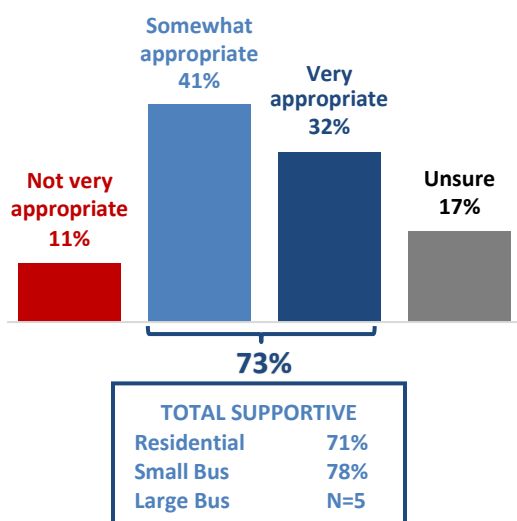
Elexicon will request special rate increases for these projects since it cannot finance them along with its other budgetary priorities. These requests are reviewed by the OEB through a process known as the Incremental Capital Module (ICM).

The first project is a large new Transformer Station in the Pickering area, required to support the residential and commercial growth that is projected to add as many as 32,000 new customers over the next 20 years. Elexicon estimates that to avoid system capacity shortages, the station needs to be in service in 2022.

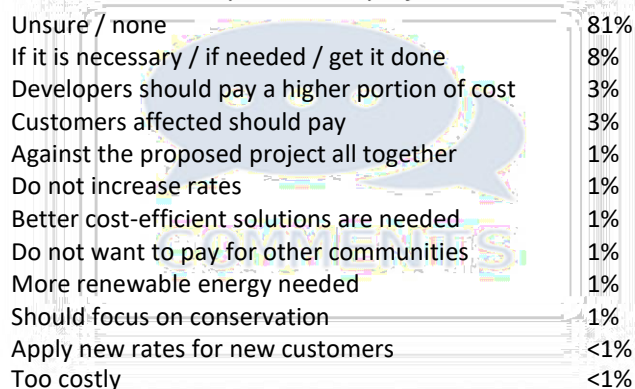
The project is expected to cost about \$40 million, which amounts to an approximate:

- \$1.45 - \$1.85 bill increase per month starting in 2022 for the average **residential customer** in the Veridian rate zone.
- 2.90 - \$3.60 bill increase per month starting in 2022 for the average **small business customer** in the Veridian rate zone.
- \$280.95 - \$343.40 bill increase per month starting in 2022 for the average **large business customer** in the Veridian rate zone.

"To what degree do you consider the level of proposed investments in the Transformer Station appropriate?"



"Do you have any thoughts you'd like to share with respect to this project?"



Seventy-three percent consider the level of investment appropriate (somewhat & very), only 11% do not feel it appropriate, and 17% were undecided. More than 80% had no comments, with those that did being split over support and wanting alternative costing options.

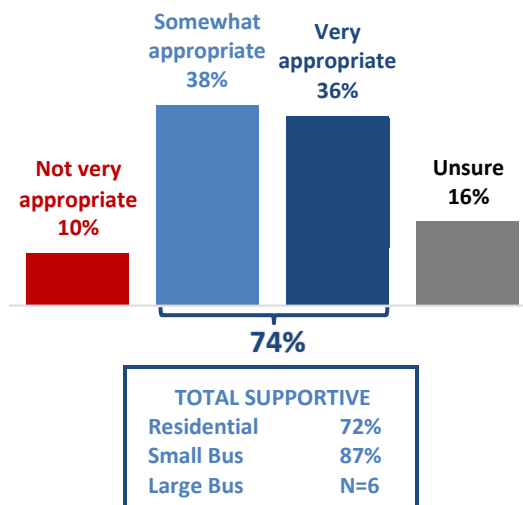
ICM Project #2: Accommodating the Move of the Belleville Operations Centre

The second project for funding is a new Operations Centre in Belleville to accommodate staff and equipment involved in providing customer service and responding to local power outages. The lease on the existing facility is set to expire in 2021 and cannot be renewed. Having considered all feasible options, Elexicon determined that owning a new facility is the most cost-effective option for customers in the long term.

The project is expected to cost about \$2.6 million, which amounts to an approximate

- \$0.10 - \$0.15 bill increase per month starting in 2022 for the average **residential customer** in the Veridian rate zone.
- \$0.25 - \$0.30 bill increase per month starting in 2022 for the average **small business customer** in the Veridian rate zone.
- \$2.6 million, which amounts to an approximate \$18.35 - \$23.50 bill increase per month starting in 2022 for the average **large business customer** in the Veridian rate zone.

"To what degree do you consider the level of proposed investments in the Operations Centre appropriate?"



"Do you have any thoughts you'd like to share with respect to this project?"

Unsure / none	88%
It is a required investment / reasonable / needed	4%
Customers / communities affected should pay	3%
Lack of information to make an informed decision	2%
Refurbish an existing building	2%
Customers should not have to pay	1%
Against project all together	1%
Consider lease / renting building	1%
Build it smart / keep future growth in mind	1%
Business / developers should pay	<1%

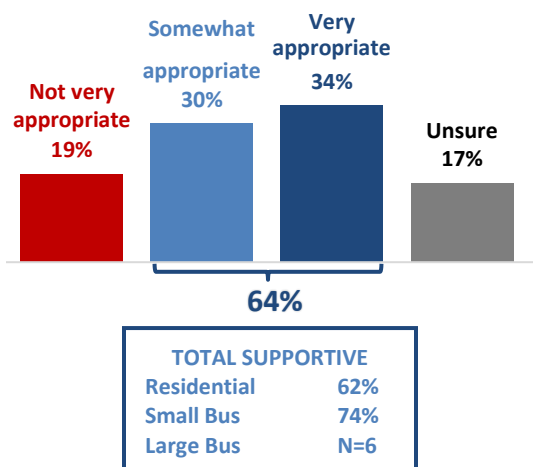
Almost three-quarters consider the level of investment appropriate, with results very strong among businesses. Most had no comments or thoughts to share. Comments were spread among those supporting the project and others opposed to having to pay for it.

ICM Project #3: Underground System Relocation in Pickering to Enable Regional Bus Rapid Transit

To enable construction of dedicated Rapid Transit Bus Lanes in the Hwy #2 corridor in Pickering, Elexicon is required to relocate existing underground feeder infrastructure located in the right of way intended for the bus lanes. Elexicon and its customers are responsible for a portion of this cost, estimated to be \$2.8 million. While performing this work, Elexicon will have an opportunity to replace or upgrade any equipment, as necessary.

- The project's cost is equivalent to an approximate \$0.10 - \$0.15 bill increase per month starting in 2022 for the average **residential customer** in the Veridian rate zone.
- The project's cost is equivalent to an approximate \$0.25 - \$0.30 bill increase per month starting in 2022 for the average **small business customer** in the Veridian rate zone.
- The project's cost is equivalent to an approximate \$27.95 - \$35.70 bill increase per month starting in 2022 for the average **large business customer** in the Veridian rate zone.

"Do you consider the level of investment proposed for this underground infrastructure project to be very appropriate, somewhat appropriate, or not appropriate?"



"Do you have any thoughts you'd like to share with respect to this project?"

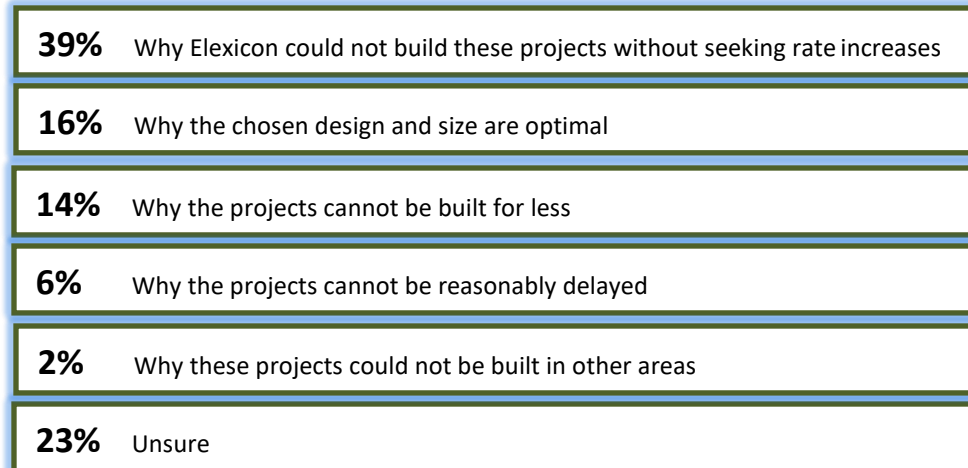
Unsure / none	76%
Customers / communities affected should pay	5%
Should be a priority	4%
Project should be covered by taxpayers	3%
Costs should be covered by transit users	2%
Need more information / unclear	2%
Complete as efficiently and quickly as possible	2%
Will improve reliability	1%
Project not a priority	1%
Municipality should pay	1%
Transit is important / needed for growth	1%
Should be paid for by investors	1%
Poor planning	1%
Will raise rates	1%
Disagree with project	1%



Results were lowest for this project with 64% saying the project was somewhat or very appropriate. While some comments expressed support, others reflected the belief that funding or costing should come from others, such as affected users and municipalities.

In the final question about the three ICM projects, respondents were asked which of five options would give them the most confidence that Elexicon is acting in their best interest.

“What type of information about the three proposed ICM projects would give you the most confidence that Elexicon is acting in the best interest of their customers in mind?”

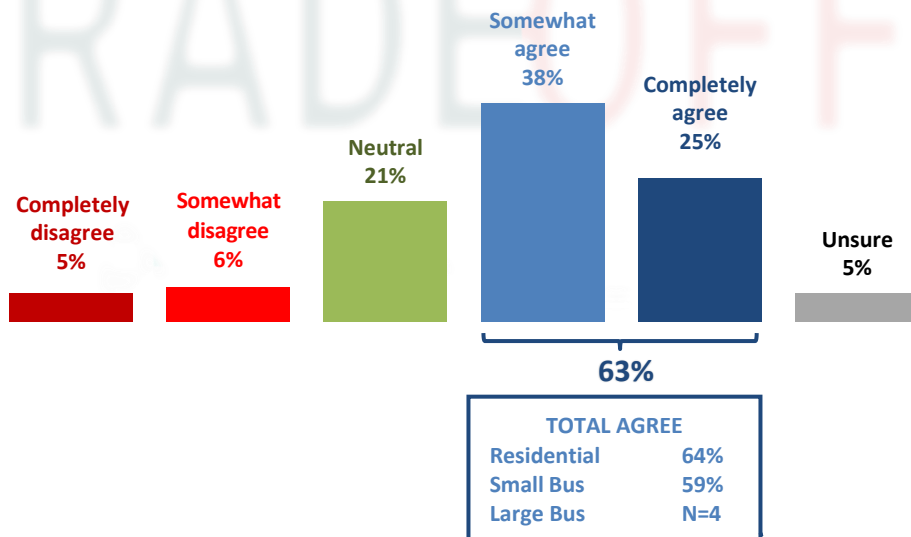


Most named was why Elexicon could not build these projects without seeking rate increases, followed by why the chosen designs and sizes are optimal and then why they cannot be built for less. Twenty-three percent answered do not know or were unsure.

Part D

Elexicon Energy Part D: Concluding Observations

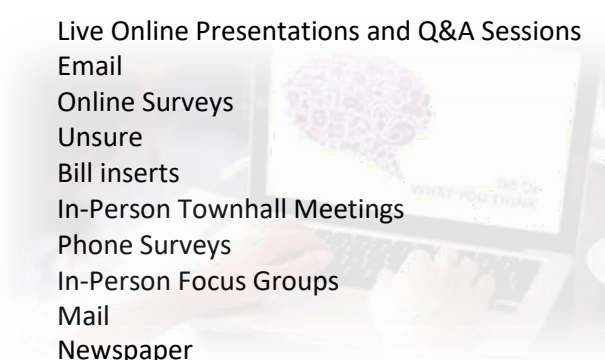
"As a result of taking this survey, would you agree that you have a better appreciation of the planning trade-offs that Elexicon must consider when making investment plans?"



Sixty-three percent somewhat or completely agreed that they have a better appreciation of the planning trade-offs that Elexicon needs to consider when making investment plans. This compares to 11% that somewhat or completely disagreed, while 21% gave a neutral (neither agree nor disagree) response and 5% were unsure.

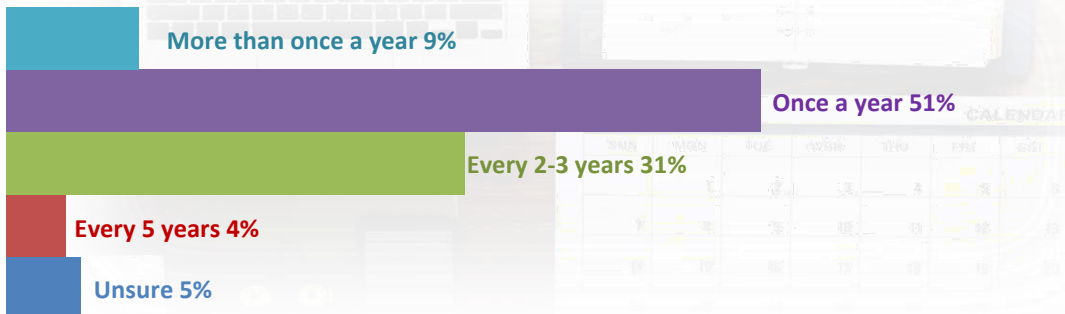
Customers were asked about their preferred method to have Elexicon consult with them on similar topics. Below are the percentage of counts or the responses for each category.

"In the future, what is your preferred method to have Elexicon consult with you about topics similar to what we discussed?"



Live Online Presentations and Q&A Sessions	33%
Email	22%
Online Surveys	20%
Unsure	15%
Bill inserts	14%
In-Person Townhall Meetings	7%
Phone Surveys	2%
In-Person Focus Groups	2%
Mail	1%
Newspaper	1%

"How often should Elexicon engage its customers on matters such as those captured in this survey?"



Once a year is how often a small majority want to be engaged, followed by 31% that named every 2-3 years, 9% more than once a year, and only 4% every five years.

“Do you have any other comments, questions, or suggestions that you would like Elexicon to consider as it develops its capital plans for the coming years?”

Unsure / none	N=467	78%
Lower rates	N=51	9%
Limit increases to most needed projects	N=18	3%
Promote Green Energy	N=12	2%
Do most needed first	N=10	2%
Upgrades too costly	N=8	1%
Improve customer service	N=6	1%
More energy savings advice	N=5	1%
More outreach needed	N=5	1%
Amount and length of outages too high	N=3	1%
Communities should cover costs	N=3	1%
Support upgrades	N=3	1%
Upgrades should not impact customers	N=3	1%
Support Electric vehicles	N=2	<1%
Removal of overhead wires	N=2	<1%
The projects should have been planned	N=1	<1%
We should not pay for new developments	N=1	<1%

Online Results by Question

Q1.Firstly, please confirm that you reside in a household or work in an organization associated with an Elexicon customer account.

	N	Percent
Yes	262	100.0

Q01B.What is the municipality associated with the Elexicon customer account?

	N	Percent
Whitby	75	28.6
Ajax	61	23.3
Pickering	43	16.4
Belleville	19	7.3
Clarington (Bowmanville, Orono, Newcastle)	19	7.3
Gravenhurst	19	7.3
Port Hope	11	4.2
Brock (Beaverton, Cannington, Sunderland)	7	2.7
Port Perry	7	2.7
Uxbridge	1	.4
Total	262	100.0

Q02.To provide better context for your responses, please confirm whether you are completing this survey as a Residential Customer or a Business Customer.

	N	Percent
Residential	262	100.0

Q03.In your <household/business> what is your role with respect to paying for the cost of electricity? Are you primarily responsible, partially responsible, or not responsible for paying the electricity bill?

	N	Percent
I am primarily responsible for paying my household's electricity bill	233	88.9
I share the responsibility for paying my household's electricity bill	29	11.1
Total	262	100.0

Q1. When did you first become aware of the merger between Veridian Connections and Whitby Hydro Electric Corporation to form Elexicon?		
	N	Percent
More than a year ago	183	69.8
Less than a year ago	40	15.3
Was not aware until this survey	19	7.3
Not Sure	20	7.6
Total	262	100.0

Q2A. Overall, how satisfied are you with the services Elexicon provides you with?		
	N	Percent
Highly Satisfied	92	35.1
Somewhat Satisfied	90	34.4
Neither Satisfied nor Dissatisfied	45	17.2
Somewhat Dissatisfied	17	6.5
Highly Dissatisfied	10	3.8
Not Sure	8	3.1
Total	262	100.0

Q2B. In your own words, what are the reasons for your current level of satisfaction or dissatisfaction with Elexicon as expressed in your last response?		
	N	Percent
No problems / satisfied	59	22.5
Unsure	55	21.0
Reliable / stable service	33	12.6
Poor service / interruptions in service	29	11.1
Hydro rates are high / expensive	23	8.8
No change	10	3.8
Old / outdated Infrastructure	7	2.7
Dislike time of use / need to simplify / change	6	2.3
No notice for planned outages	5	1.9
No experience / new customers / too soon to rate	5	1.9
Poor customer service / long waits	5	1.9
Service has improved	5	1.9
Website problems / issues	4	1.5
Simplify billing / payment methods	3	1.1
Billing problems	3	1.1
Good customer service	3	1.1
The transition has been seamless	2	.8
Need alternative energy options	2	.8
Cannot compare due to the monopoly	1	.4
Lack of follow up	1	.4
Give rebates	1	.4
Total	262	100.0

Q3.“The amount of my monthly electricity bill is a major expense item for my family and requires me to go without some other important priorities.”			
		N	Percent
	Strongly Disagree	65	24.8
	Somewhat Disagree	52	19.8
	Neither Agree nor Disagree	71	27.1
	Somewhat Agree	54	20.6
	Strongly Agree	18	6.9
	Not Sure	2	.8
	Total	262	100.0

Q4.“When I had specific questions or requests for Elexicon or its predecessors, I was satisfied with how they were resolved.”			
		N	Percent
	Strongly Agree	51	19.5
	Somewhat Agree	46	17.6
	Neither Agree nor Disagree	50	19.1
	Somewhat Disagree	24	9.2
	Strongly Disagree	9	3.4
	Not Applicable	82	31.3
	Total	262	100.0

Q5.If you plan to purchase a vehicle in the next five years, how likely are you to consider purchasing an electric vehicle?			
		N	Percent
	Very Likely	40	15.3
	Somewhat Likely	75	28.6
	Not Very Likely	49	18.7
	Not Likely at All	56	21.4
	Not Applicable	22	8.4
	Not Sure	20	7.6
	Total	262	100.0

Q6.How likely are you to become involved in self-generation of electricity at your place of residence over the next five years (for example, by installing solar panels)?			
		N	Valid Percent
	I am already involved in self generation	6	2.3
	Very Likely	22	8.4
	Somewhat Likely	46	17.6
	Not Very Likely	78	29.8
	Not Likely at All	67	25.6
	Not Applicable (e.g., housing situation does not permit)	27	10.3
	Not Sure	16	6.1
	Total	262	100.0

Q7. In 2019, an average Elexicon customer experienced 1.28 outages. Thinking back to your experience over the past year, how many times has the power been out at...			
		N	Percent
	0	21	8.0
	1	37	14.1
	2	77	29.4
	3	33	12.6
	More than 3	64	24.4
	Not Sure	30	11.5
	Total	262	100.0

Q8. In 2019, Elexicon customers experienced power outages lasting an average of 1.63 hours. Thinking back to your experience, please estimate how long your power outages lasted on average?

	N	Percent
Under 30 minutes	52	19.8
Under 1 hour	58	22.1
Between 1 and 2 hours	57	21.8
Longer than 2 hours	56	21.4
Not Sure	39	14.9
Total	262	100.0

Q9. Which of the following options best represents your overall satisfaction with service reliability over the last few years?

	N	Percent
Very Satisfied	111	42.4
Somewhat Satisfied	88	33.6
Neither Satisfied nor Dissatisfied	24	9.2
Somewhat Dissatisfied	23	8.8
Very Dissatisfied	8	3.1
Not Sure	8	3.1
Total	262	100.0

Q10. When power outages do occur, which aspect of them has been most inconvenient for you?

	N	Percent
How long the outages have lasted	114	43.5
How often the outages have occurred	52	19.8
Not Sure	42	16.0
Impact it has on my electronics / computers	19	7.3
None / no inconveniences	11	4.2
Getting information from Elexicon / contact with (duration, restoration, etc.)	8	3.1
Both how often & how long	8	3.1
Timing / when they occur	5	1.9
No heat / no cooling / appliances	3	1.1
Total	262	100.0

Q11. When there is a power outage, how do you interact with Elexicon Energy? Select all that apply.

	N	Percent
I check the outage map online	98	37.4
I do not take any steps	79	30.2
I phone the outage number posted on the website	51	19.5
I check Twitter	16	6.1
Telephone call	7	2.7
No experience	4	1.5
I use both Twitter and Map	3	1.1
Radio	2	.8
Unsure	2	.8
Total	262	100.0

Q12. Please indicate your level of interest in the following potential service offering: When an outage occurs, are you interested in receiving notifications sent to your phone (via text and/or voice to landline) about its cause and anticipated restoration time?

	N	Percent
Yes	226	86.3
No	27	10.3
Not Sure	9	3.4
Total	262	100.0

Q13. To manage the impact of power outages, Elexicon replaces aging infrastructure, trims trees near powerlines, and invests in equipment that helps restore service faster. Which of the following statements best represents your views on what level of reliability Elexicon should target?

	N	Percent
Elexicon should spend more on reliability, but less in other areas that also affect customers, if this can help avoid some bill increases.	97	37.0
Elexicon should maintain current reliability levels, even if it gradually increases my monthly electricity bill in the Long term	83	31.7
Elexicon should invest more to improve reliability, and I would accept a larger increase to my monthly bill in the long term	32	12.2
Not Sure	30	11.5
Maintain reliability & do not raise prices	11	4.2
Elexicon should invest less in outage prevention to reduce the impact of future bill increases, even if it potentially m	7	2.7
Provide better service overall	2	.8
Total	262	100.0

Q14 Which of the following options best describes your views on this trade-off?

	N	Percent
Elexicon should replace more equipment before it fails, spending more today to prevent future outages and keep bill increases predictable	212	80.9
Not Sure	25	9.5
Elexicon should wait until more equipment fails, reducing its spending today, even if this causes more future outages and unpredictable bill increases down the road	13	5.0
Maintenance on a schedule & no rate increases	10	3.8
Invest in better equipment	2	.8
Total	262	100.0

Q15. Please select two potential objectives from the following list that you think Elexicon should focus its efforts on in addition to keeping the system safe and accommodating new growth in the coming years.

	Q15 FIRST CHOICE	N	Percent
	Improving the grid's resilience to major weather events, like storms, floods, or freezing rain	74	28.2
	Preparing the grid for new types of uses, like electric vehicles and renewable generation	61	23.3
	Investing now in things that will help reduce rate increases after 2029	34	13.0
	Reducing the environmental impact of Elexicon's operations	31	11.8
	Helping customers manage their electricity use	25	9.5
	Minimizing the impact of power outages	18	6.9
	Improving power quality	13	5.0
	Addressing customer requests faster and more efficiently	6	2.3
	Total	262	100.0

Q15 SECOND CHOICE		N	Percent
	Improving the grid's resilience to major weather events, like storms, floods, or freezing rain	82	31.3
	Investing now in things that will help reduce rate increases after 2029	52	19.8
	Minimizing the impact of power outages	51	19.5
	Preparing the grid for new types of uses, like electric vehicles and renewable generation	30	11.5
	Helping customers manage their electricity use	25	9.5
	Reducing the environmental impact of Elexicon's operations	13	5.0
	Improving power quality	6	2.3
	Addressing customer requests faster and more efficiently	3	1.1
	Total	262	100.0

Q16. Aside from investments to support customer growth, Elexicon currently plans to spend about 73% of its remaining five-year budget on managing reliability, 22% on efficiency, health, and safety of its own operations, and 5% on the technical upkeep of its power grid. Do you consider this plan satisfactory, or would you prefer to allocate more budget towards one of those three categories above the others?

	N	Percent
I am satisfied with the planned allocation based on what I know	130	49.6
I would prefer to spend more on the technical upkeep of the power grid and less on the other two	48	18.3
Not Sure	43	16.4
I would prefer to spend more on reliability and less on the other two	22	8.4
I would prefer to spend more on efficiency, health, and safety of operations and less on the other two	19	7.3
Total	262	100.0

Q17. Part of Elexicon's future planning involves investing in grid management technologies that will help it manage the impact of more Electric Vehicles, Renewable Generation, and Energy Storage. Like with all budgeting decisions, investing in new technology today requires making trade-offs. How supportive are you of Elexicon's intent to invest in future technologies at this time?

	N	Percent
Highly Supportive	91	34.7
Somewhat Supportive	102	38.9
Neither Supportive nor Unsupportive	32	12.2
Somewhat Unsupportive	15	5.7
Highly Unsupportive	9	3.4
Not Sure	13	5.0
Total	262	100.0

Q18. To the best of your knowledge, does your place of residence / business currently receive power via a rear-lot line?

	N	Percent
Yes	29	11.1
No	192	73.3
Not Sure	41	15.6
Total	262	100.0

Q19. Exlexicon has several options to consider for how it schedules the rear-lot conversion work. Which of the following options do you see as most preferred?		
	N	Percent
Maintain the status quo – keep all the lines overhead in the rear lots, replacing them as they fail.	45	17.2
Move lines underground and plan work according to worst performing areas.	57	21.8
Move lines underground and plan work geographically, finishing all work in one area before moving elsewhere.	100	38.2
Not Sure	60	22.9
Total	262	100.0

Q20.To what degree do you consider the level of proposed investments in the Transformer Station appropriate?		
	N	Percent
Very Appropriate	72	27.5
Somewhat Appropriate	105	40.1
Not Very Appropriate	31	11.8
Not Sure / Cannot Rate	54	20.6
Total	262	100.0

Q21.Do you have any thoughts you'd like to share with respect to this project?		
	N	Percent
Unsure / none	184	70.2
Customers affected should pay	17	6.5
Developers should be covering a higher portion of the cost	15	5.7
Against the proposed project all together	9	3.4
If it is necessary / if needed / get it done	9	3.4
Better cost-efficient solutions are needed	9	3.4
Do not want to pay for other communities	5	1.9
Do not increase rates	3	1.1
Not enough information to make a decision	3	1.1
Safely and reliability	2	.8
More renewable energy sources such as solar or wind	2	.8
Too costly	2	.8
Make sure there is a backup plan	1	.4
Should focus on conservation	1	.4
Total	262	100.0

Q22.To what degree do you consider the level of proposed investments in the Operations Centre appropriate?		
	N	Percent
Very Appropriate	84	32.1
Somewhat Appropriate	96	36.6
Not Very Appropriate	29	11.1
Not Sure / Cannot Rate	53	20.2
Total	262	100.0

Q23.Do you have any thoughts you'd like to share with respect to this proposed project?		
	N	Percent
Unsure / none	207	79.0
Customers / communities affected should pay	11	4.2
It is a required investment / reasonable / needed	8	3.1
Refurbish an existing building	6	2.3
Should come from reserve funds not customers	4	1.5
Against project all together	4	1.5
Lack of information to make an informed decision	4	1.5
Build it smart / keep future growth in mind	3	1.1
Compare leasing versus new build	3	1.1
Customers should not have to pay	3	1.1
Lease / rent building	2	.8
Should have been done years ago	2	.8
Proposed budget seems too low	1	.4
Municipality should help finance	1	.4
Savings should be passed onto the customer	1	.4
Business / developers should pay	1	.4
Should be mortgage financed	1	.4
Total	262	100.0

Q24.To what degree do you consider the level of proposed investments in the Underground System Relocation appropriate?		
	Frequency	Percent
Very Appropriate	81	30.9
Somewhat Appropriate	80	30.5
Not Very Appropriate	51	19.5
Not Sure / Cannot Rate	50	19.1
Total	262	100.0

Q25.Do you have any thoughts you'd like to share with respect to this proposed project?		
	N	Percent
Unsure / none	194	74.0
Customers / residents / communities affected should pay	16	6.1
Should be a priority	9	3.4
Project should be covered by taxpayers	8	3.1
Project not a priority	7	2.7
Need more information / unclear	5	1.9
Costs should be covered by transit users	5	1.9
Municipality should pay	4	1.5
Should be paid for by investors	3	1.1
Will improve reliability	3	1.1
Poor planning	2	.8
Project should be completed as efficiently and quickly as possible	2	.8
Disagree with project	2	.8
Will raise rates	1	.4
Should be Elexicon's responsibility	1	.4
Total	262	100.0

Q26.What type of information about the three proposed ICM projects would give you the most confidence that Elexicon is acting with the best interest of their customers in mind?

	N	Percent
Why Elexicon could not build these projects without seeking rate increases	98	37.4
Not Sure	76	29.0
Why the chosen design and size are optimal	39	14.9
Why the projects cannot be built for less	30	11.5
Why the projects cannot be reasonably delayed	14	5.3
Why these projects could not be built in other areas	5	1.9
Total	262	100.0

Q27.We're almost done – we have only a few more questions to ask you. As a result of taking this survey, would you agree that you have a better appreciation of the planning trade-offs that Elexicon must consider when making investment plans?

	N	Percent
Completely Agree	69	26.3
Somewhat Agree	112	42.7
Neither Agree nor Disagree	50	19.1
Somewhat Disagree	11	4.2
Completely Disagree	7	2.7
Not Sure	13	5.0
Total	262	100.0

Q28. To help Elexicon improve on customer engagement in the future, please identify your preferred ways for being consulted in the future on similar topics.

MULTIPLES RESPONSES ACCEPTED		Responses		Percent of Cases
		N	Percent	
	Online Surveys	244	74.8%	93.1%
	Phone Surveys	8	2.5%	3.1%
	In-Person Focus Groups	13	4.0%	5.0%
	In-Person Townhall Meetings	20	6.1%	7.6%
	Live Online Presentations and Q&A Sessions	35	10.7%	13.4%
	Mail	2	0.6%	0.8%
	Newspaper	1	0.3%	0.4%
	Bill inserts	2	0.6%	0.8%
	General email	1	0.3%	0.4%
Total		326	100.0%	124.4%

Q29.How often should Elexicon engage its customers on matters such as those captured in this survey?

	N	Percent
Once a Year	126	48.1
Once Every 2-3 Years	86	32.8
More Than Once a Year	31	11.8
Once Every 5 Years	12	4.6
Not Sure	7	2.7
Total	262	100.0

Q30.Do you have any other comments, questions, or suggestions that you would like Elexicon to consider as it develops its capital plans for the coming years?

	N	Percent
Unsure / none	218	83.2
Lower rates	12	4.6
Promote Green Energy	5	1.9
Limit increases to most needed projects	2	.8
Removal of overhead wires	2	.8
Invest in an outage communication system	2	.8
App to monitor usage	2	.8
More tools to help manage my electricity use	2	.8
Keep the utilities public / local	2	.8
Amount and length of outages too high	1	.4
Support Electric vehicles	1	.4
Stop all investment in Green Energy	1	.4
Communities should cover costs	1	.4
Support upgrades	1	.4
Create jobs	1	.4
Move to online payments only	1	.4
Improve customer service	1	.4
Would like to obtain data from Smart Meter	1	.4
Capital costs should have been pre-planned	1	.4
Upgrades should not impact customers	1	.4
Upgrades too costly	1	.4
The entire ratepayer base should not pay for expansion to new subdivisions.	1	.4
Trees are being trimmed down / cut down unnecessarily	1	.4
More outreach needed	1	.4
Total	262	100.0

Telephone Results by Question

Q1. Firstly, please confirm that you reside in a household or work in an organization associated with an Elexicon customer account.

	Frequency	Percent
Yes	600	100.0

Q01B. What is the municipality associated with the Elexicon customer account?

	N	Percent
Whitby	173	28.8
Ajax	107	17.8
Pickering	103	17.2
Belleville	60	10.0
Clarington (Bowmanville, Orono, Newcastle)	45	7.5
Gravenhurst	44	7.3
Port Hope	27	4.5
Brock (Beaverton, Cannington, Sunderland)	17	2.8
Scugog	14	2.3
Uxbridge	10	1.7
Total	600	100.0

Q02. To provide better context for your responses, please confirm whether you are completing this survey as a Residential Customer or a Business Customer.

	N	Percent
Residential	524	87.3
Small Business (monthly electricity bill below \$2,500)	70	11.7
Large Business (monthly electricity bill above \$2,500)	6	1.0
Total	600	100.0

Q03. In your <household/business> what is your role with respect to paying for the cost of electricity? Are you primarily responsible, partially responsible, or not responsible for paying the electricity bill?

	N	Percent
I am primarily responsible for paying my household's electricity bill	466	77.7
I share the responsibility for paying my household's electricity bill	58	9.7
I am the person responsible for managing my organization's electricity bill	42	7.0
I am the person overseeing the management of my organization's electricity bill	34	5.7
Total	600	100.0

Q1. When did you first become aware of the merger between Veridian Connections and Whitby Hydro Electric Corporation to form Elexicon?

	N	Percent
More than a year ago	426	71.0
Less than a year ago	93	15.5
Was not aware until this survey	36	6.0
Not Sure	45	7.5
Total	600	100.0

Q2A. Overall, how satisfied are you with the services Elexicon provides you with?

	N	Percent
Highly Satisfied	217	36.2
Somewhat Satisfied	213	35.5
Neither Satisfied nor Dissatisfied	91	15.2
Somewhat Dissatisfied	39	6.5
Highly Dissatisfied	22	3.7
Not Sure	18	3.0
Total	600	100.0

Q2B. In your own words, what are the reasons for your current level of satisfaction or dissatisfaction with Elexicon as expressed in your last response?

	N	Percent
Unsure / none	178	29.7
No problems / satisfied	146	24.3
Reliable / stable service	82	13.7
Hydro rates are high / expensive	75	12.5
Poor service / interruptions / outages	61	10.2
No experience / new customers / too soon to rate	12	2.0
Old / outdated Infrastructure	11	1.8
Good customer service	7	1.2
Poor customer service /long wait times	7	1.2
No notice for planned outages	6	1.0
Simplify billing / payment methods	5	.8
Dislike time of use / need to simplify / change	5	.8
Lack of follow up	3	.5
Billing problems	2	.3
Total	600	100.0

Q3. “The amount of my monthly electricity bill is a major expense item for my family and requires me to go without some other important priorities.”

	N	Percent
Strongly Disagree	119	19.8
Somewhat Disagree	146	24.3
Neither Agree nor Disagree	135	22.5
Somewhat Agree	143	23.8
Strongly Agree	53	8.8
Not Sure	4	.7
Total	600	100.0

Q4. “When I had specific questions or requests for Elexicon or its predecessors, I was satisfied with how they were resolved.”

	N	Percent
Strongly Agree	117	19.5
Somewhat Agree	127	21.2
Neither Agree nor Disagree	112	18.7
Somewhat Disagree	49	8.2
Strongly Disagree	26	4.3
Not Applicable	163	27.2
Unsure	6	1.0
Total	600	100.0

Q5. If you plan to purchase a vehicle in the next five years, how likely are you to consider purchasing an electric vehicle?

	N	Percent
Very Likely	94	15.7
Somewhat Likely	189	31.5
Not Very Likely	107	17.8
Not Likely at All	124	20.7
Not Applicable	41	6.8
Not Sure	45	7.5
Total	600	100.0

Q6. How likely are you to become involved in self-generation of electricity at your place of residence over the next five years (for example, by installing solar panels)?

	N	Percent
I am already involved in self generation	15	2.5
Very Likely	56	9.3
Somewhat Likely	100	16.7
Not Very Likely	164	27.3
Not Likely at All	171	28.5
Not Applicable (e.g., housing situation does not permit)	47	7.8
Not Sure	47	7.8
Total	600	100.0

Q7. In 2019, an average Elexicon customer experienced 1.28 outages. Thinking back to your experience over the past year, how many times has the power been out at your home to the best of your recollection?

	N	Percent
0	42	7.0
1	87	14.5
2	184	30.7
3	83	13.8
More than 3	154	25.7
Not Sure	50	8.3
Total	600	100.0

Q8. In 2019, Elexicon customers experienced power outages lasting an average of 1.63 hours. Thinking back to your experience, please estimate how long your power outages lasted on average?

	N	Percent
Under 30 minutes	137	22.8
Under 1 hour	128	21.3
Between 1 and 2 hours	123	20.5
Longer than 2 hours	150	25.0
Not Sure	62	10.3
Total	600	100.0

Q9. Which of the following options best represents your overall satisfaction with service reliability over the last few years?

	N	Percent
Very Satisfied	245	40.8
Somewhat Satisfied	188	31.3
Neither Satisfied nor Dissatisfied	61	10.2
Somewhat Dissatisfied	70	11.7
Very Dissatisfied	22	3.7
Not Sure	14	2.3
Total	600	100.0

Q10. When power outages do occur, which aspect of them has been most inconvenient for you?

	N	Percent
How long the outages have lasted	289	48.2
How often the outages have occurred	114	19.0
Not Sure	91	15.2
Impact it has on my electronics / computers	46	7.7
None / no inconveniences	24	4.0
Both how often & how long	17	2.8
Getting information from Elexicon / contact with (duration, restoration, etc.)	12	2.0
Timing / when they occur	7	1.2
Total	600	100.0

Q11.When there is a power outage, how do you interact with Elexicon Energy?			
		N	Percent
	I check the outage map online	229	38.2
	I do not take any steps	171	28.5
	I phone the outage number posted on the website	126	21.0
	I check Twitter	36	6.0
	Telephone call	22	3.7
	Unsure	9	1.5
	No experience	5	.8
	Radio	2	.3
	Total	600	100.0

Q12.Please indicate your level of interest in the following potential service offering: When an outage occurs, are you interested in receiving notifications sent to your phone (via text and/or voice to landline) about its cause and anticipated restoration time?

		N	Percent
	Yes	524	87.3
	No	58	9.7
	Not Sure	18	3.0
	Total	600	100.0

Q13.To manage the impact of power outages, Elexicon replaces aging infrastructure, trims trees near powerlines, and invests in equipment that helps restore service faster. Which of the following statements best represents your views on what level of reliability Elexicon should target?

		N	Percent
	Elexicon should spend more on reliability, but less in other areas that also affect customers, if this can help avoid some bill increases	226	37.7
	Elexicon should maintain current reliability levels, even if it gradually increases my monthly electricity bill in the long term	219	36.5
	Elexicon should invest more to improve reliability, and I would accept a larger increase to my monthly bill in the long term	72	12.0
	Not Sure	60	10.0
	Maintain reliability & do not raise prices	15	2.5
	Elexicon should invest less in outage prevention to reduce the impact of future bill increases, even if it potentially means more and longer outages for myself and others	8	1.3
	Total	600	100.0

Q14 Which of the following options best describes your views on this trade-off?

		N	Percent
	Elexicon should replace more equipment before it fails, spending more today to prevent future outages and keep bill increases predictable	507	84.5
	Not Sure	41	6.8
	Elexicon should wait until more equipment fails, reducing its spending today, even if this causes more future outages and unpredictable bill increases down the road	30	5.0
	Maintenance on a schedule & no rate increases	22	3.7
	Total	600	100.0

Q15. Please select two potential objectives from the following list that you think Elexicon should focus its efforts on in addition to keeping the system safe and accommodating new growth in the coming years.

Q15. FIRST CHOICE		N	Percent
	Improving the grid's resilience to major weather events, like storms, floods, or freezing rain	192	32.0
	Preparing the grid for new types of uses, like electric vehicles and renewable generation	133	22.2
	Investing now in things that will help reduce rate increases after 2029	73	12.2
	Helping customers manage their electricity use	65	10.8
	Reducing the environmental impact of Elexicon's operations	63	10.5
	Minimizing the impact of power outages	37	6.2
	Improving power quality	24	4.0
	Addressing customer requests faster and more efficiently	13	2.2
	Total	600	100.0

Q15. SECOND CHOICE		N	Percent
	Improving the grid's resilience to major weather events, like storms, floods, or freezing rain	182	30.3
	Minimizing the impact of power outages	121	20.2
	Investing now in things that will help reduce rate increases after 2029	120	20.0
	Preparing the grid for new types of uses, like electric vehicles and renewable generation	69	11.5
	Helping customers manage their electricity use	51	8.5
	Reducing the environmental impact of Elexicon's operations	30	5.0
	Improving power quality	20	3.3
	Addressing customer requests faster and more efficiently	7	1.2
	Total	600	100.0

Q16. Aside from investments to support customer growth, Elexicon currently plans to spend about 73% of its remaining five-year budget on managing reliability, 22% on efficiency, health, and safety of its own operations, and 5% on the technical upkeep of its power grid. Do you consider this plan satisfactory, or would you prefer to allocate more budget towards one of those three categories above the others?

	N	Percent
I am satisfied with the planned allocation based on what I know	319	53.2
I would prefer to spend more on the technical upkeep of the power grid and less on the other two	95	15.8
Not Sure	84	14.0
I would prefer to spend more on reliability and less on the other two	65	10.8
I would prefer to spend more on efficiency, health, and safety of operations and less on the other two	37	6.2
Total	600	100.0

Q17. Part of Elexicon's future planning involves investing in grid management technologies that will help it manage the impact of more Electric Vehicles, Renewable Generation, and Energy Storage. Like with all budgeting decisions, investing in new technology today requires making trade-offs. How supportive are you of Elexicon's intent to invest in future technologies at this time?

	N	Percent
Highly Supportive	243	40.5
Somewhat Supportive	215	35.8
Neither Supportive nor Unsupportive	66	11.0
Somewhat Unsupportive	25	4.2
Highly Unsupportive	26	4.3
Not Sure	25	4.2
Total	600	100.0

Q18. To the best of your knowledge, does your place of residence / business currently receive power via a rear-lot line?

	N	Percent
Yes	79	13.2
No	505	84.2
Not Sure	16	2.7
Total	600	100.0

Q19. Elexicon has several options to consider for how it schedules the rear-lot conversion work. Which of the following options do you see as most preferred?

	N	Percent
Maintain the status quo – keep all the lines overhead in the rear lots, replacing them as they fail.	131	21.8
Move lines underground and plan work according to worst performing areas.	144	24.0
Move lines underground and plan work geographically, finishing all work in one area before moving elsewhere.	234	39.0
Not Sure	91	15.2
Total	600	100.0

Q20. To what degree do you consider the level of proposed investments in the Transformer Station appropriate?

	N	Percent
Very Appropriate	189	31.5
Somewhat Appropriate	247	41.2
Not Very Appropriate	62	10.3
Not Sure / Cannot Rate	102	17.0
Total	600	100.0

Q21. Do you have any thoughts you'd like to share with respect to this project?

	N	Percent
Unsure / none	484	80.7
If it is necessary / if needed / get it done	50	8.3
Developers should be covering a higher portion of the cost	18	3.0
Customers affected should pay	16	2.7
Against the proposed project all together	6	1.0
Do not increase rates	6	1.0
Better cost-efficient solutions are needed	6	1.0
Do not want to pay for other communities	4	.7
More renewable energy sources such as solar or wind	3	.5
Should focus on conservation	3	.5
Apply new rates for new customers	2	.3
Too costly	2	.3
Total	600	100.0

Q22. To what degree do you consider the level of proposed investments in the Operations Centre appropriate?

	N	Percent
Somewhat Appropriate	228	38.0
Very Appropriate	215	35.8
Not Very Appropriate	59	9.8
Not Sure / Cannot Rate	98	16.3
Total	600	100.0

Q23.Do you have any thoughts you'd like to share with respect to this proposed project?			
		N	Percent
	Unsure / none	525	87.5
	It is a required investment / reasonable / needed	21	3.5
	Customers / communities affected should pay	17	2.8
	Lack of information to make an informed decision	9	1.5
	Refurbish an existing building	9	1.5
	Customers should not have to pay	6	1.0
	Against project all together	4	.7
	Lease / rent building	4	.7
	Build it smart / keep future growth in mind	3	.5
	Business / developers should pay	2	.3
	Total	600	100.0

Q24.To what degree do you consider the level of proposed investments in the Underground System Relocation appropriate?			
		N	Percent
	Very Appropriate	206	34.3
	Somewhat Appropriate	177	29.5
	Not Very Appropriate	113	18.8
	Not Sure / Cannot Rate	104	17.3
	Total	600	100.0

Q25.Do you have any thoughts you'd like to share with respect to this proposed project?			
		N	Percent
	Unsure / none	456	76.0
	Customers / residents / communities affected should pay	30	5.0
	Should be a priority	22	3.7
	Project should be covered by taxpayers	15	2.5
	Costs should be covered by transit users	14	2.3
	Need more information / unclear	10	1.7
	Project should be completed as efficiently and quickly as possible	9	1.5
	Will improve reliability	8	1.3
	Project not a priority	8	1.3
	Municipality should pay	7	1.2
	Transit is important / needed for growth	6	1.0
	Should be paid for by investors	5	.8
	Poor planning	4	.7
	Will raise rates	3	.5
	Disagree with project	3	.5
	Total	600	100.0

Q26.What type of information about the three proposed ICM projects would give you the most confidence that Elexicon is acting with the best interest of their customers in mind?			
		N	Percent
	Why Elexicon could not build these projects without seeking rate increases	234	39.0
	Not Sure	137	22.8
	Why the chosen design and size are optimal	94	15.7
	Why the projects cannot be built for less	86	14.3
	Why the projects cannot be reasonably delayed	36	6.0
	Why these projects could not be built in other areas	13	2.2
	Total	600	100.0

Q27. We're almost done – we have only a few more questions to ask you. As a result of taking this survey, would you agree that you have a better appreciation of the planning trade-offs that Elexicon must consider when making investment plans?

	N	Percent
Completely Agree	151	25.2
Somewhat Agree	227	37.8
Neither Agree nor Disagree	129	21.5
Somewhat Disagree	34	5.7
Completely Disagree	28	4.7
Not Sure	31	5.2
Total	600	100.0

Q28. To help Elexicon improve on customer engagement in the future, please identify your preferred ways for being consulted in the future on similar topics.

MULTIPLES RESPONSES ACCEPTED		Responses		Percent of Cases
		N	Percent	
	Online Surveys	121	17.6%	20.2%
	Phone Surveys	9	1.3%	1.5%
	In-Person Focus Groups	10	1.5%	1.7%
	In-Person Townhall Meetings	40	5.8%	6.7%
	Live Online Presentations and Q&A Sessions	195	28.3%	32.5%
	Mail	7	1.0%	1.2%
	Newspaper	5	0.7%	0.8%
	Bill inserts	82	11.9%	13.7%
	Email	132	19.2%	22.0%
	Unsure	87	12.6%	14.5%
Total		688	100.0%	114.7%

Q29. How often should Elexicon engage its customers on matters such as those captured in this survey?

	N	Percent
Once Every 5 Years	24	4.0
Once Every 2-3 Years	184	30.7
Once a Year	304	50.7
More Than Once a Year	55	9.2
Not Sure	33	5.5
Total	600	100.0

Q30.Do you have any other comments, questions, or suggestions that you would like Elexicon to consider as it develops its capital plans for the coming years?

	N	Percent
Unsure / none	467	77.8
Lower rates	51	8.5
Limit increases to most needed projects	18	3.0
Promote Green Energy	12	2.0
Do most needed first	10	1.7
Upgrades too costly	8	1.3
Improve customer service	6	1.0
Energy savings advice	5	.8
More outreach needed	5	.8
Amount and length of outages too high	3	.5
Communities should cover costs	3	.5
Support upgrades	3	.5
Upgrades should not impact customers	3	.5
Support Electric vehicles	2	.3
Removal of overhead wires	2	.3
The projects should have been planned	1	.2
We should not pay for new developments	1	.2
Total	600	100.0



VECC – 2

Reference: Appendix B– Incremental Capital Module Page 16

Preamble:

Elexicon indicates 63% of Elexicon customers (544 of the 862 surveyed) considers the proposed Underground System Relocation in Pickering to Enable Regional Bus Rapid Transit to be appropriate. 77% of surveyed customers when asked if they had any thoughts specific to the project answered “unsure/ none”, indicating the general approval and lack of concerns.

Question:

Please provide the survey questions, responses and summary report of the survey.

Response:

Please see Elexicon’s response to VECC-1.



VECC – 3

Reference: Appendix B– Page 5

Question:

- a) Please calculate the Threshold Capital Expenditure for 2022 (VRZ) and Maximum Eligible Incremental Capital (VRZ) if the spending for the Seaton TS is removed from 2022 and the forecast capital in the DSP (VRZ) is smoothed over the 5 year period 2022 to 2026 such that the forecast spend in 2022 (VRZ) is the average of the 5 years.**

Response:

If Seaton TS is removed from 2022 and the 2022 forecasted capital expenditures in the VRZ is revised to match the 5-year average of 2022 to 2026 (\$30.1MM), then the Materiality Threshold for 2022 (VRZ) would remain at \$18.8MM, and the Maximum Eligible Incremental Capital (VRZ) would be \$11.3MM.

Elexicon does not agree that such a smoothing approach is appropriate for the purposes of determining the Materiality Threshold or the Maximum Eligible Incremental Capital.

- b) Please provide the bill impacts.**

Response:

Using the assumptions in (a) generates the following bill impacts if the BRT Hwy 2 ICM is approved:



VECC-3 Table 1: Bill Impacts of Original Submission (updated for Staff-25)

Original Submission (updated for Staff - 25)				A Distribution Charges (excluding pass through)		B Distribution Charges (including pass through)		C Delivery (including Sub-Total B)		Total Bill	
Customer Class	kWh	kW	RPP? Non?	\$ Change	% Change	\$ Change	% Change	\$ Change	% Change	\$ Change	% Change
Residential	750		RPP	1.95	6.9%	4.12	12.5%	5.46	12.8%	5.13	4.4%
Seasonal	645		RPP	4.06	8.0%	5.81	10.5%	7.02	10.9%	6.61	5.2%
GS<50 kW	2,000		RPP	4.12	7.5%	10.12	15.0%	13.26	14.6%	12.48	4.3%
GS 50 to 2,999 kW	432,160	1,480	Non	417.77	7.5%	2,896.47	47.1%	3,982.50	28.4%	4,500.22	6.2%
GS 3,000 to 4,999 kW	1,752,000	4,000	Non	1,079.16	7.0%	8,924.76	52.0%	12,156.36	29.9%	13,736.69	5.0%
Large User	4,219,400	6,800	Non	2,368.92	7.4%	15,250.84	43.7%	20,744.56	27.7%	23,441.35	3.7%
USL	500		RPP	1.19	7.2%	2.69	13.9%	3.48	13.8%	3.27	4.4%
Sentinel Lights	180	1	RPP	1.62	8.4%	2.69	13.2%	3.15	13.2%	2.97	7.3%
Street Lighting	424,881	988	Non	2,040.84	16.0%	3,693.83	28.5%	4,169.99	25.4%	4,712.09	6.1%

VECC-3 Table 2: Bill Impacts after Changes Proposed in VECC-3

Updated VECC - 3				A Distribution Charges (excluding pass through)		B Distribution Charges (including pass through)		C Delivery (including Sub-Total B)		Total Bill	
Customer Class	kWh	kW	RPP? Non?	\$ Change	% Change	\$ Change	% Change	\$ Change	% Change	\$ Change	% Change
Residential	750		RPP	0.28	1.0%	2.45	7.4%	3.79	8.9%	3.56	3.1%
Seasonal	645		RPP	1.01	2.0%	2.76	5.0%	3.97	6.2%	3.74	3.0%
GS<50 kW	2,000		RPP	0.84	1.5%	6.84	10.1%	9.98	11.0%	9.40	3.3%
GS 50 to 2,999 kW	432,160	1,480	Non	95.16	1.7%	2,573.87	41.8%	3,659.89	26.1%	4,135.68	5.7%
GS 3,000 to 4,999 kW	1,752,000	4,000	Non	175.48	1.1%	8,021.08	46.7%	11,252.68	27.7%	12,715.53	4.6%
Large User	4,219,400	6,800	Non	529.16	1.6%	13,411.08	38.4%	18,904.80	25.3%	21,362.42	3.4%
USL	500		RPP	0.20	1.2%	1.70	8.8%	2.49	9.9%	2.34	3.1%
Sentinel Lights	180	1	RPP	0.46	2.4%	1.52	7.4%	1.98	8.3%	1.87	4.6%
Street Lighting	424,881	988	Non	1,270.80	10.0%	2,923.78	22.5%	3,399.95	20.7%	3,841.94	5.0%

VECC-3 Table 3: Comparison of Change in Bill Impacts

Customer Class	Impact VECC 3	
	\$ Change	% Change
Residential	- 1.57	-1.4%
Seasonal	- 2.87	-2.3%
GS<50 kW	- 3.09	-1.1%
GS 50 to 2,999 kW	- 364.54	-0.5%
GS 3,000 to 4,999 kW	- 1,021.16	-0.4%
Large User	- 2,078.93	-0.3%
USL	- 0.93	-1.3%
Sentinel Lights	- 1.10	-2.7%
Street Lighting	- 870.15	-1.1%



VECC – 4

Reference: Appendix B– Incremental Capital Module Page

Question:

Elexicon indicates that in the merger application (EB-2018-0236), Veridian and Whitby Hydro identified that there were potential ICM requirements during the 10-year deferral period, and specifically mentioned the Seaton Transformer Station as one such potential project.

Please provide the reference.

Response:

Elexicon's merger application (EB-2018-0236) identifying Seaton TS as a potential ICM is referenced below:

Page 20:

"Under the proposed rate-making plan, LDC Mergeco will annually file a PCIR application for the previous Veridian LDC service area and an AIRI application for the previous Whitby LDC service area for the duration of the 10 year rebasing deferral period. The proposed rate making plan includes the provision of an Incremental Capital Module ("ICM"), applicable to the Veridian LDC service area only, for the nondiscretionary Seaton TS and Belleville service centre capital investments referenced above."

Page 42:

"At the time of this Application, Veridian LDC has identified ICM requirements during the deferral period. These capital investments include but are not limited to supporting the forecasted electricity demands in north Pickering by means of a new transformer station



(Seaton MTS) and capital investments required to meet the future needs of the Belleville Operations Centre.

As set out in the Handbook and referenced in the Board's Decision in EB-2016-0025, rate-setting following a consolidation will not be addressed in an application for approval of a consolidation transaction unless there is a rate proposal that is an integral aspect of the consolidation. The Applicants submit that there is no need to address an ICM in this MAADs proceeding but believe it is appropriate to identify these capital requirements at this time as they are likely to be the subject of an ICM during the proposed deferral period"



VECC – 5

Reference:

Preamble:

While Elexicon originally anticipated that its new Belleville operations centre might also be included in this ICM application, Elexicon recognizes that a certain degree of project expenditure over and above the defined threshold calculation is expected to be absorbed within Elexicon's total capital budget.

Question:

a) What is the status of the Belleville operations centre?

Response:

Please see Elexicon's response to PWU-1.

b) Does Elexicon expect to absorb this project within its total capital budget. If yes, what year?

Response:

Yes, Elexicon expects to absorb this project within its total capital budget. Please see Elexicon's response to PWU-1 for additional details and timing.