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December 18, 2023

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON M4P 1E4
Email: registrar@oeb.ca

Dear Ms. Marconi,

RE: Stakeholder Feedback | Draft Phase One Benefit-Cost Analysis Framework, Ontario Energy Board File Number: EB-2023-0125

The Coalition of Large Distributors ("CLD") consists of Alectra Utilities Corporation, Elexicon Energy Inc., Hydro One Networks Inc., Hydro Ottawa Limited, and Toronto Hydro-Electric System Limited. Together, the CLD's customers represent more than 3.8 million, or approximately 70% of electricity consumers located across the province.

On December 14th, 2023 the OEB issued its draft Phase One Benefit-Cost Analysis Framework for Addressing Electricity System Needs ("Framework"). The OEB also simultaneously issued a Draft Phase One Benefit Cost Analysis ("BCA") Reporting Template as well as a Draft BCA Framework Examples and Worked-out Sample document. The OEB has invited stakeholder participants to provide written feedback on the draft Framework by Tuesday, January 16th, 2024.

The CLD underscores that the development of the Framework carries a great magnitude, with the potential to encompass a fundamental change to the current utility business model. The outcome of the Framework involves a potential reallocation of costs, which will ultimately be borne by ratepayers. The CLD is cognizant of the impact that this consultation will have on customers, shareholders and the industry as a whole. Meaningful consultation and thoughtful decision making are imperative in this process.

The CLD recognizes that many organizations, including the OEB, have holiday timeout periods at the end of December/beginning of January, where many offices are closed or operate with limited staff. Given the importance of this file, it is critical that stakeholders have the opportunity to socialize the Framework across their organizations in order to provide meaningful feedback. As such, the CLD believes that a deadline for comment of January 16th, 2024 provides for an insufficient timeline of essentially two weeks for stakeholders to engage and consult within their own organizations. Consequently, the CLD respectfully requests that the OEB extend the deadline for comments on the Framework to **February 1st, 2024**. The CLD respectfully submits that two additional weeks of comment in what is in effect a 15-month process (starting with the



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Framework of Energy Innovation report issued on January 30th, 2023) is a comparatively small request, but will go a long way to give high quality feedback and socialize the important concepts contained within it at this vital point in the process.

The CLD appreciates the OEB's attention to this request.

If you have any questions, please contact the undersigned.

Sincerely,

DocuSigned by:

April Barrie

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On behalf of

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