

February 1, 2024

VIA RESS

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Marconi:

Re: Benefit-Cost Analysis Framework for Addressing Electricity System Needs; OEB File: EB-2023-0125

On September 20, 2023, the OEB initiated a consultation to support the development of a Benefit-Cost Analysis (BCA) Framework for addressing electricity system needs. The BCA Framework will assist LDCs in evaluating all relevant benefits and costs associated with potential solutions for addressing a system need, including both traditional poles-and-wires solutions and the use of Distributed Energy Resources (DER) as Non-Wires Solutions (NWS).

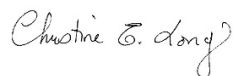
Alectra Utilities ("Alectra") supports the introduction of a BCA Framework and is pleased that the OEB is introducing guidance that will stimulate growth in the use of NWS in Ontario and establish consistency in the sector's approach to evaluating alternatives.

On December 14, the OEB published the draft BCA Framework as well as examples demonstrating the use of the BCA Framework and invited input from stakeholders.

Alectra appreciates the opportunity to provide these comments on the draft materials for the OEB's consideration.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,



Christine E. Long
Vice President, Regulatory Affairs & Privacy Officer
Alectra Utilities Corporation