

April 17, 2024

VIA EMAIL

Mr. Brian Hewson Vice President, Consumer Protection & Industry Performance Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, ON M4P 1E4 Email: IndustryRelations@oeb.ca

Dear Mr. Hewson,

Re: Alectra Campbell Road LP - Section 80 Notice

Alectra Campbell Road LP ("Alectra Campbell Road") is a newly formed Ontario limited partnership. Alectra Campbell Road has been established for the purposes of owning and operating eleven behind-the-meter natural gas generation facilities, with a total installed capacity of 15.5 MW, located in Guelph, Ontario and Windsor, Ontario. The generation facilities, which are currently under construction, are expected to commence commercial operation on June 3, 2024.

In connection with the construction, ownership, and operation of the generation facilities, Alectra Campbell Road has filed applications with the OEB pursuant to subsections 57(c) and (d) of the *Ontario Energy Board Act, 1998* (the "Act") for an electricity generation licence and an electricity retailer licence (application numbers EGLA00085 and ERLA00032, respectively). In addition, Alectra Campbell Road is hereby filing a notice pursuant to section 80 of the Act. This is because Alectra Campbell Road is an affiliate of Alectra Utilities Corporation, which is a licensed Ontario electricity distributor. The section 80 notice is attached as appendices hereto.

Alectra Campbell Road would also like to advise the OEB of an item of note. As the OEB may be aware, as part of the IESO's long-term request for proposals, an affiliate to Alectra Campbell Road, Alectra Convergent Development Limited Partnership, was selected as a proponent to provide 80 MW of future capacity to Ontario through three energy storage projects. There is no section in the application form to advise of future energy sector activities, so Alectra Campbell Road wishes to advise the OEB of these activities by way of this cover letter.



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

Sincerely,

Peter Bifolchi

Peter Bifolchi, P. Eng. Manager, Engineering, Construction, and Operations Alectra Energy Solutions Inc.

Ontario Energy Board

Preliminary Filing Requirements For a Notice of Proposal under Sections 80 and 81 Of the *Ontario Energy Board Act, 1998*

INSTRUCTIONS:

This form applies to all applicants who are providing a Notice of Proposal to the Ontario Energy Board (the "**Board**") under sections 80 and 81 of the *Ontario Energy Board Act, 1998* (the "**Act**"), including parties who are also, as part of the same transaction or project, applying for other orders of the Board such as orders under sections 86 and 92 of the Act.

The Board has established this form under section 13 of the Act. Please note that the Board may require information that is additional or supplementary to the information filed in this form and that the filing of the form does not preclude the applicant from filing additional or supplementary information.

PART I: GENERAL MINIMUM FILING REQUIREMENTS

All applicants must complete and file the information requested in Part I.

1.1 Identification of the Parties

1.1.1 Applicant

Name of Applicant:	File No: (Board Use Only)
Alectra Campbell Road LP	
Address of Head Office:	Telephone Number:
161 Cityview Blvd. Vaughan, ON L4H 0A9	416.220.1128
	Facsimile Number:
	E-mail Address:
	peter.bifolchi@alectrasolutions.com
Name of Individual to Contact:	Telephone Number:
Peter Bifolchi	416.220.1128
	Facsimile Number:
	E-mail Address:
	peter.bifolchi@alectrasolutions.com

1.1.2 Other Parties to the Transaction or Project

If more than one attach list

Name of Other Party: N/A	Board Use Only
Address of Head Office:	Telephone Number:
	Facsimile Number:
	E-mail Address:
Name of Individual to Contact:	Telephone Number:
	Facsimile Number:
	E-mail Address:

1.2 Relationship between Parties to the Transaction or Project

1.2.1	project. Alectra Campbell Roa the limited partnershi	icers, directors and shareholders of each of the parties to the proposed transaction or ad LP ("Alectra Campbell Road") does not have officers or directors. Signing authority for p rests in the general partner, Alectra Campbell Road GP. The officers and directors of ad GP are as follows:	
	Directors:		
	James Macumber John Matovich Ammar Nawaz		
	Officers:		
	Vinay Mehta Ammar Nawaz Heather Clark	General Counsel Vice President Vice President	

1.2.2	Attach a corporate chart describing the relationship between each of the parties to the proposed transaction or project and each of their respective affiliates.	
	Alectra Utilities Corporation ("Alectra Utilities") is a licensed distributor and affiliate of Alectra Energy Solutions Inc. ("Alectra Energy Solutions"). Alectra Campbell Road LP ("Alectra Campbell Road") is wholly owned indirectly by Alectra Energy Solutions.	

The corporate chart describing the relationship between each of the affiliate parties is provided in Appendix A.	

1.3 Description of the Businesses of Each of the Parties

1.3.1	Attach a description of the business of each of the parties to the proposed transaction or project, including each of their affiliates licensed under the OEB Act to operate in Ontario for the generation, transmission, distribution, wholesaling or retailing of electricity or providing goods and services to companies licensed under the OEB Act in Ontario ("Electricity Sector Affiliates").	
	Alectra Campbell Road has not commenced operations yet.	
	Alectra Campbell Road is a wholly owned subsidiary of Alectra Energy Services Inc. ("Alectra Energy Services"). Alectra Energy Services is a wholly owned subsidiary of Alectra Energy Solutions Inc. ("Alectra Energy Solutions"), which is an unregulated business wholly owned by Alectra Inc.	
	Alectra Energy Solutions provides energy management services, distributed energy solutions, metering services, high voltage and streetlighting services, solar energy services, unit sub-metering services, and metering services.	
	Alectra Energy Solutions has a Unit Sub-Metering Licence (ES-2023-0333) through Alectra Energy Services.	
	Alectra Microgrid Services Project (LNR) General Partnership on behalf of Alectra Microgrid Services Project (LNR) Limited Partnership ("Alectra Microgrid") is a wholly owned indirect subsidiary of Alectra Energy Services. Alectra Microgrid provides generation and retail services in Ontario. Alectra Microgrid has an Electricity Retailer Licence (ER-2021-0091) and an Electricity Generation Licence (EG-2021-0090).	
	Alectra Inc.'s regulated business, Alectra Utilities Corporation ("Alectra Utilities"), is a licensed distributor. Alectra Energy Solutions and each of the subsidiaries that it controls (including the applicant) are affiliates of the regulated company, Alectra Utilities.	
	Alectra Utilities has an Electricity Distribution Licence (ED-2016-0360) and an Electricity Generation Licence (EG-2004-0438). Alectra Utilities also has a separate Electricity Generation Licence (EG-2012-0259) through its majority-owned subsidiary Solar Sunbelt General Partnership ("Solar Sunbelt"). Alectra Utilities serves approximately one million homes and businesses across an 1,800 square kilometer service territory.	
	Alectra Campbell Road will provide generation services to customer facilities in Ontario. Alectra Campbell Road is submitting an Electricity Retailer Licence application as well as an Electricity Generation Licence application with the OEB to own and operate behind-the-meter generation facilities in Guelph and Windsor. Alectra Campbell Road intends to retail electricity to a large customer.	

1.3.2 Attach a description of the geographic territory served by each of the parties to the proposed transaction or project, including each of their Electricity Sector Affiliates, if applicable, and the geographic location of all existing generation facilities. Alectra Utilities distributes electricity to customers within its licensed service area, which generally includes Alliston, Aurora, Barrie, Beeton, Brampton, Bradford, West Gwillimbury, Guelph, Hamilton, Markham, Mississauga, Penetanguishene, Richmond Hill, Rockwood, St. Catharines, Thornton, Tottenham and Vaughan. Alectra Utilities owns and operates a licensed generation facility located at Weston Road/Eastview Road, Guelph. Alectra Utilities, through its majority-owned subsidiary Solar Sunbelt, owns and operates licensed generation facilities in the Hamilton, Stoney Creek, and St. Catherines areas. The locations of the facilities are as follows: 1. 450 Nebo Road, Hamilton 2. 703 Hwy. 8, Stoney Creek 3. 360 Lewis Road, Stoney Creek 4. 410 Lewis Road, Stoney Creek 5. 155 Chatham Street, Hamilton 6. 340 Vansickle Road, St. Catherines 7. 330 Wentworth Street North, Hamilton Alectra Energy Solutions, through its wholly owned subsidiary Alectra Energy Services, provides licensed unit sub-metering services to customers throughout Ontario. Alectra Energy Solutions provides additional energy solutions and services throughout North America.

1. 32 Inc 2. 301 M 3. 400 M 4. 285 M 5. 41 Ma 6. 375 M	are as follows: ependence PI, Guelph assey Rd, Guelph assey Rd, Guelph assey Rd, Guelph assey Rd, Guelph assey Rd, Guelph assey Rd, Guelph
Generati Windsor 1. 2. 3. 4. 5. 6. 7. 8. 9.	 Campbell Road is submitting an Electricity Retailer License application as well as an Electricity on License application to own and operate behind-the-meter generation facilities in Guelph and The locations of the facilities are as follows: 94 Campbell Road, Guelph, Ontario NIH 1C1 355 Silvercreek Pky N., Guelph, Ontario NIH 1E6 277 Silvercreek Pky N., Guelph, Ontario NIH 1E6 3590 Valtec Court, Windsor, Ontario NIH 1B9 30 Minto Road, Guelph, Ontario NIH 1B9 30 Minto Road, Guelph, Ontario NIH 1E6 30 Malcolm Road, Guelph, Ontario NIH 1E6 30 Malcolm Road, Guelph, Ontario NIH 1B9 280 Speedvale Ave W., Guelph, Ontario NIH 1C4 74 Campbell Road, Guelph, Ontario NIH 1C1

1.0.0		
1.3.3	Attach a breakdown of the annual sales (in C\$, and in MWh) as of the most recent fiscal year end of the existing generation output among the IESO Administered Markets ("IAM"), bilateral contracts, and local distribution companies.	
	In 2023 Alectra Utilities, through its licensed generation facility located at Weston Road/Eastview Road, Guelph, reported the following: - Generation sales of C\$0 - Generation energy of 0 MWh	
	In 2023, Alectra Utilities, through its majority-owned subsidiary Solar Sunbelt, reported the following: - Generation sales of C\$1,031,555 - Generation energy of 1,446.8 MWh	
	In 2023, Alectra Microgrid, reported the following: - Generation sales of C\$126,038 - Generation energy of 1,051.6 MWh	
	The 2022 values are also included here, as they are used to produce market share calculations further below:	
	In 2022, Alectra Utilities, through its licensed generation facility located at Weston Road/Eastview Road, Guelph, reports the following: - Generation sales of C\$169,194.15 - Generation energy of MWh 2064	
	In 2022, Alectra Utilities, through its majority-owned subsidiary Solar Sunbelt, reports the following: - Generation sales of C\$1,284,826.00 - Generation energy of MWh 1802	
	In 2022, Alectra Microgrid, reports the following: - Generation sales of C\$31,180.00 - Generation energy of MWh 151	
	Alectra Campbell Road has no generation sales to report.	

1.3.4	Attach a list identifying all relevant Board licences and approvals held by the parties to the proposed transaction or project and each of their Electricity Sector Affiliates, and any applications currently before the Board, or forthcoming. Please include all Board file numbers.	
	Alectra Utilities: Electricity Distributor Licence: ED-2016-0360 Electricity Generation Licence: EG-2004-0438	
	Solar Sunbelt: Electricity Generation Licence: EG-2012-0259	
	Alectra Energy Services: Unit Sub-Metering Licence: ES-2023-0333	
	Alectra Microgrid: Electricity Generation Licence: EG-2021-0090 Electricity Retailer Licence: ER-2021-0091	

1.4 Current Competitive Characteristics of the Market

1.4.1	Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to the completion of the proposed transaction or project.	
	As per Electricity Generation Licence EG-2004-0438, Alectra Utilities owns and operates a generation facility with an installed capacity of 1.85 MW.	
	As per Electricity Generation Licence: EG-2012-0259, Solar Sunbelt owns and operates generation facilities totaling an installed capacity of 1.3 MW.	
	As per Electricity Generation Licence: EG-2021-0090, Alectra Microgrid owns and operates generation facilities totaling an installed capacity of 13.95MW.	

1.4.2	Describe the generation market share based on actual MWh production as a percent of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to completion of the proposed transaction or project.	
	The 2023 Total Annual Ontario Energy Demand has not yet been published by the IESO, therefore, the calculation below and in section 1.5.3 are based on the 2022 value. The 2022 Total Annual Ontario Energy Demand was approximately 137,600,000 MWh. ¹	
	Prior to the completion of the proposed project, based on the 2022 MWh production as a percent of the 2022 Total Annual Ontario Energy Demand, the generation market shares are:	
	 0.0015% for Alectra Utilities; 0.0013% for Solar Sunbelt; and 0.00011% for Alectra Microgrid. 	
	Since Alectra Microgrid is a behind-the-meter load displacement project and does not supply provincial demand, the true generation market share is actually nil.	

1.5 Description of the Proposed Transaction or Project and Impact on Competition - General

1.5.1

Attach a detailed description of the proposed transaction or project, including geographic locations of proposed new transmission or distribution systems, or new generation facilities.

¹ Source: <u>https://www.ieso.ca/en/Power-Data/Demand-Overview/Historical-Demand</u>

Alectra Campbell Road is constructing eleven generation facilities, as further described in Appendix B.	

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1.5.2	Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.	
	Alectra Campbell Road will own and operate generation facilities totaling an installed capacity of 15.5 MW. As per Electricity Generation Licence EG-2004-0438, Alectra Utilities owns and operates a generation facility with an installed capacity of 1.85 MW.	
	As per Electricity Generation Licence: EG-2012-0259, Solar Sunbelt owns and operates generation facilities totaling an installed capacity of 1.3 MW.	
	As per Electricity Generation Licence: EG-2021-0090, Alectra Microgrid owns and operates generation facilities totaling an installed capacity of 13.95MW.	
1.5.3	Describe the generation market share based on anticipated MWh production as a percentage of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project. Prior to the completion of the proposed project, based on the 2022 MWh production and the anticipated MWh production for Alectra Campbell Road, as a percentage of the 2022 Total Annual Ontario Energy Demand, the generation market shares are:	
	 - 0.0015% for Alectra Utilities; - 0.0013% for Solar Sunbelt; - 0.00011% for Alectra Microgrid; and - 0.00087% for Alectra Campbell Road. 	
	Since both Alectra Microgrid and Alectra Campbell Road are behind-the-meter load displacement projects that do not supply provincial demand, the true generation market share is actually nil.	

1.5.4	Attach a short description of the impact, if any, of the proposed transaction or project on competition. If there will be no impact on competition, please state the reasons. Cite specifically the impacts of the proposal on customer choice regarding generation, energy wholesalers, and energy retailers.	
	As a result of the transaction, there will be no impact on competition. All eleven facilities to be constructed will be located behind the meter and will provide dedicated services to a specific customer.	

1.5.5	Provide confirmation that the proposed transaction or project will have no impact on open access to the transmission or distribution system of the parties or their affiliates. If open access will be affected explain how and why.	
	Confirmed. There will be no impact on open access to the distribution system of the affiliate, Alectra Utilities.	

1.6 Other Information

1.6.1	Attach confirmation that the parties to the proposed transaction or project are in compliance with all licence and code requirements and will continue to be in compliance after completion of the proposed transaction or project.	
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Confirmed. All parties to the proposed transaction are in compliance with applicable licence and code requirements. Further information can be found in Section 15 and Section 14 of Alectra Campbell Road's respective Generation Licence and Retailer Licence Application Forms.

PART II: SECTION 80 OF THE ACT-TRANSMITTERS AND DISTRIBUTORS ACQUIRING AN INTEREST IN GENERATORS OR CONSTRUCTING A GENERATION FACILITY

All applicants filing a Notice of Proposal under section 80 of the Act must complete and file the information requested in Part II.

2.1 Effect on Competition

2.1.2	Describe whether the proposed generation output will be primarily offered into the IAM, sold via bilateral contracts, or for own use.	
	The proposed generation output will be primarily for a customer through a bilateral contract.	

2.1.3	Provide a description of the generation including fuel source, technology used, maximum capacity output, typical number of hours of operation in a year, and peaking versus base-load character.	
	A description of the generation is provided in Appendix B.	

2.1.4	Provide details on whether the generation facility is expected to sign a "must run" contract with the IESO.	
	No "must run" contract is required with the IESO.	

2.1.5	Provide details of whether the generation facility is expected to serve a "load pocket" or is likely to be "constrained on" due to transmission constraints.	
	Neither. The generation facilities are operating for peak mitigation purposes.	

2.2 System Reliability

Section 2.2 must be completed by applicants who are claiming that the proposed transaction or project is required for system reliability under section 82(2)(b) of the Act.

2.2.1	Provide reasons why the proposal is required to maintain the reliability of the transmission or distribution system. Provide supporting studies.	
2.2.2	Discuss the effect of the proposal on the adequacy (ability of supply to meet demand) of supply in the relevant control area or distribution region, citing effects on capacity plus reserve levels in comparison to load forecasts. N/A	
2.2.3	Discuss the effect of the proposal on the security (ability of supply to respond to system contingencies) of supply. N/A	

2.2.4	Provide a copy of the IESO Preliminary System Impact Assessment Report, if completed, and the IESO Final System Impact Assessment Report, if completed. If the IESO is not conducting a System Impact Assessment Report, please explain.	

PART III: SECTION 81 OF THE ACT—GENERATORS ACQUIRING AN INTEREST IN OR CONSTRUCTING A TRANSMISSION OR DISTRIBUTION SYSTEM

All applicants filing Notice of Proposal under section 81 of the Act must complete and file the information requested in Part III.

3.1 Effect on Competition

3.1.1	Provide a description of the transmission or distribution system being acquired or constructed.	
	N/A	
3.1.2	Provide details on whether the generation facilities owned by the acquiring company are or will be directly connected to the transmission or distribution system being acquired or constructed.	
	N/A	
3.1.3	Provide details of whether the generation facility is expected to serve a "load pocket" or is likely to be "constrained on" due to transmission constraints.	
	N/A	
3.1.4	Provide details on whether the generation facilities are expected to sign a "must-run" contract with the IESO.	
	N/A	

How to Contact the Ontario Energy Board

The Ontario Energy Board is located at:

P.O. Box 2319 2300 Yonge Street, Suite 2701 Toronto, Ontario M4P 1E4

Telephone: Toll Free Number: Fax: website: Registrar's e-mail address: 416-481-1967 1-888-632-6273 416-440-7656 http://www.oeb.gov.on.ca registrar@oeb.gov.on.ca Appendix A of Section 80 Notice

Alectra Inc – Corporate Structure (September 18, 2023)



² Alectra Real Estate Holdings Inc is the registered (but not beneficial) holder, as nominee and bare trustee for AUC, of real estate formerly held by Brampton Hydro ³ Util-Assist Corp. – operating company in USA

⁴ Alectra Microgrid Services LP owns 100% of Alectra Microgrid Services Project GP and 99.9% of Alectra Microgrid Services Project LP (not shown)

⁵ Convergent Canada AcquisitionCo ULC owns the other 50% of these entities

Alectra Energy Services Inc – Detailed Corporate Structure (September 18, 2023)



Appendix B of Section 80 Notice

Facility	Address	Technology and Capacity	Fuel source	Typical number of hours of operation in a year	Peaking versus baseload character
Linamar - Comtech I	94 Campbell Road, Guelph, Ontario NIH 1C1	1X1MW Caterpillar G3512	Natural Gas	300	Mode A is Peaking
Linamar- Comtech II	355 Silvercreek Pky N., Guelph, Ontario NIH 1E6	1X1MW Caterpillar G3512	Natural Gas	300	Mode A is Peaking
Linamar- Eston	277 Silvercreek Pky N., Guelph, Ontario NIH 1E6	1X1.5MW Caterpillar G3512H	Natural Gas	300	Mode A is Peaking
Linamar- Exkor	3590 Valtec Court, Windsor, Ontario N8N 5E6	1x1.5MW Caterpillar G3512H	Natural Gas	300	Mode A is Peaking
Linamar- Linergy	87 Campbell Road, Guelph, Ontario NIH 1B9	1X1.5MW Caterpillar G3512H	Natural Gas	300	Mode A is Peaking
Linamar-LPC	30 Minto Road, Guelph, Ontario NIK 1H5	1X1.5MW Caterpillar G3512H	Natural Gas	300	Mode A is Peaking
Linamar-LPP	347 Silvercreek Pky N., Guelph, Ontario NIH 1E6	1X1MW Caterpillar G3512	Natural Gas	300	Mode A is Peaking

Facility	Address	Technology and Capacity	Fuel source	Typical number of hours of operation in a year	Peaking versus baseload character
Linamar- Quadrad	30 Malcolm Road, Guelph, Ontario NIK 1B1	1X1.5MW Caterpillar G3512H	Natural Gas	300	Mode A is Peaking
Linamar- Skyjack	55 Campbell Road, Guelph, Ontario NIH 1B9	1X1MW Caterpillar G3512	Natural Gas	300	Mode A is Peaking
Linamar- Traxle	280 Speedvale Ave W., Guelph, Ontario NIH 1C4	1X1MW Caterpillar G3512	Natural Gas	300	Mode A is Peaking
Linamar- Vehcom A&B	74 Campbell Road, Guelph, Ontario NIH 1C1	A: 1X2MW Caterpillar G3520 B: 1X1MW Caterpillar G3512 for B	Natural Gas	300	Mode A is Peaking