



THE BOARD OF DIRECTORS

PATRICIA ADAMS
President
RICHARD C. OWENS
Chair
GLENN FOX
Economist, University of Guelph
GAIL REGAN
President, Cara Holdings Inc.

MAX ALLEN
Producer, CBC Radio
ANN CAVOUKIAN
Executive Director, PBID, Metropolitan University
DAVID CAYLEY
Writer and Broadcaster
GEORGE TOMKO
Expert-in-Residence in IPSI, University of Toronto

July 21, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Mr. Murray,

**RE: EB-2025-0204 Distribution Customer Connections Review
Working Group - Request to Participate of Energy Probe**

In its letter of July 3, 2025, the OEB announced that it was initiating a review of distribution customer connections. To support this work, OEB staff is establishing a technical working group with representatives of both customers and distributors and is seeking nominations to the working group.

Energy Probe Research Foundation (Energy Probe) is requesting to participate in the review and is nominating its consultant, Tom Ladanyi, to the working group. He has more than 50 years of experience in the utilities industry in Ontario and has participated in over 200 OEB proceedings and consultations as a witness, a case manager or a consultant.

Statement of Interest

Energy Probe is a frequent intervenor in OEB proceedings and a participant in its consultations. Energy Probe was a participant in many past OEB consultations. Members and supporters of Energy Probe are customers of Ontario electricity distributors and have an interest in the outcome of this stakeholder engagement.

Energy Probe has been a participant in the EB-2019-0207 DER Connections Initiative and the undersigned is a member of the related DER consultations and groups: DER Connections Sub-group, DER Interconnection Considerations Small Group, Capacity Information Map Sub-group, and DER Cost Responsibility Small Group. Energy Probe was a participant in the EB-2024-0126 Transmission Connections Review earlier this year where it was also represented by the undersigned.

Energy Probe's perspectives on Distribution Connection Issues

Energy Probe's members and supporters expect it to argue for equitable rates that optimize results across all ratepayer classes, by eliminating cross subsidies among the various ratepayer classes. Energy Probe believes in the user pay principle where costs follow benefits. Customers connecting to the distribution system should pay the full cost of connection including any incremental upstream costs.

The consultation on the Capacity Information Map has shown that there are areas of the systems of Ontario's electricity distributors that have spare capacity where additional customers can be attached. At
Energy Probe Research Foundation 417 Bloor Street West, Suite 202, Toronto, Ontario, M5S 1X6

the present time, this spare capacity is offered on a first come first served basis to new customers. It is not clear what happens if the new customer does not take up the new capacity in a reasonable time. Can a distributor offer it to other customers? How about areas with no capacity to serve new customers? Who should pay for capacity expansions? It seems to Energy Probe that the Distribution System Code does not effectively deal with these situations.

Energy Probe believes that there should be no preference for connections of certain customers because of their claimed higher moral purpose or perceived greater economic benefits than other customers. Neither should other customers be required to subsidize them.

Cost Award Eligibility

Energy Probe is a non-profit organization which relies on individual donations to help protect the interest of its members and supporters. Without the prospect of an award of costs, Energy Probe's ability to participate in consultations would be limited. Energy Probe intends to seek a cost award for its participation in this consultation. As an organization representing the direct interests of electricity consumers it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure and its Practice Direction on Cost Awards.

Communications

Communications relating to this participation and cost award eligibility request letter should be directed to its consultant:

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
41 Divadale Drive
Toronto ON
M4G 2N7
Tel: 416 423-3685
tom.ladanyi@rogers.com

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
Consultant representing Energy Probe

cc. Patricia Adams (Energy Probe)
Ahmet Erdem (OEB Staff)