



August 1, 2025

By Email

Mr. Ritchie Murray  
Deputy Registrar  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
[registrar@oeb.ca](mailto:registrar@oeb.ca)

Dear Mr. Murray,

**Re: Consultation on the Regulatory Treatment of Local Electricity Demand-side Management (Stream 2) Programs (OEB File No. EB-2025-0156)**

On July 23, 2025, the Ontario Energy Board (OEB) issued a letter regarding the initiation of a consultation on the regulatory treatment of electricity demand-side management (eDSM) programs delivered by local distribution companies (LDCs) that provide both local and system wide benefits (the "Consultation"). The OEB noted that this Consultation will use the electricity DSM Stream 2 Report as a starting point to consider the appropriate regulatory treatment of Stream 2 Programs.

To support this work, OEB staff are inviting all interested stakeholder to participate in the Consultation.

The Canadian Charging Infrastructure Council (CCIC) wishes to express its interest in participating in the Consultation (EB-2025-0156). We understand that this Consultation comes after detailed proposals from the IESO/LDC DSM Regulatory Working Group and a new eDSM directive, issued by the Minister in 2024. The current request for stakeholder input involves assessing an appropriate review process for applications to the OEB for approval of Stream 2 Program funding, an assessment of the appropriate balance between ratepayer funded spending on eDSM and development of new energy efficiency programs, and any additional proposed changes to the Non-Wires Solutions (NWS) Guidelines.

Given this background, CCIC is uniquely positioned to contribute meaningfully to this Consultation.



CCIC was formed on April 29, 2025 with a mission to achieve a comprehensive and economically sustainable electric vehicle (EV) charging ecosystem across Canada. CCIC represents EV charging companies that deploy and supply EV charging equipment. CCIC's members are responsible for over 50% of the public EV charging stations in Canada including both high and low powered public charging stations and a large number of the private networked residential and commercial charging stations in Ontario.

Because the charging stations deployed by CCIC members are networked, they have the potential to contribute to efforts to manage system and distribution grid impacts via eDSM, particularly as the adoption of EVs increases in coming years. Furthermore, CCIC members participate in many eDSM programs and pilots across North America and bring extensive collective experience regarding successful implementation and realization of benefits to ratepayers from such programs. As significant consumers of electricity across Ontario, CCIC members and their customers have a strong interest in the successful and cost-effective implementation of the eDSM programs in Ontario, including Stream 2.

We request that the following representatives of CCIC be included as participants in the **working group**:

- Travis Allan – Counsel to CCIC ([travis@gilbertslaw.ca](mailto:travis@gilbertslaw.ca))
- Robyn McDougall – Counsel to CCIC ([robyn@gilbertslaw.ca](mailto:robyn@gilbertslaw.ca))

CCIC intends to apply for cost awards for its participation in the Consultation and for any subsequent eligible activities that may be identified. In accordance with the OEB's requirements, a separate, more detailed written submission requesting cost awards will be filed with the OEB.

We are committed to making every effort to communicate and coordinate our participation with groups representing similar interests, as encouraged by the OEB. We also believe that it will be useful to the OEB to coordinate and share the perspectives of interested CCIC members, creating efficiencies in the EV charging sector's response to the outlined questions and any other requested feedback.

We believe our experience and perspective would be valuable to the Consultation's objectives in determining the appropriate regulatory treatment of Stream 2 Programs. We look forward to the opportunity to contribute meaningfully through our feedback.



Should you have any questions, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis J. Allan", written over a horizontal line.

Travis J. Allan

*Counsel to CCIC*  
[travis@gilbertslaw.ca](mailto:travis@gilbertslaw.ca)  
416.417.1195