

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B, as amended (the “OEB Act”);

**AND IN THE MATTER OF** an Application by Oshawa PUC Networks Inc. to set rates for the distribution of electricity and other charges effective January 1, 2026.

**AND IN THE MATTER OF** Rule 27 of the Board’s *Rules of Practice and Procedure*.

**NOTICE OF MOTION**

The School Energy Coalition (“SEC”) will make a motion to the Ontario Energy Board (“the OEB”) at its offices at 2300 Yonge Street, Toronto, on a date and at a time to be fixed by the OEB.

**PROPOSED METHOD OF HEARING:**

In order to move the proceeding forward as efficiently as possible, SEC proposes that this motion be heard orally.

**THE MOTION IS FOR:**

1. An order requiring Oshawa PUC Networks Inc. (“OPUC”) to provide full and adequate responses to the following interrogatory questions<sup>1</sup>:
  - a. Interrogatory 1-SEC/Staff/CCMBC-7(b)
  - b. Interrogatory 1-SEC/Staff/CCC/PP/CCMBC/VECC-9(a), (f), (g) and (h)
  - c. Interrogatory 1-SEC-17
  - d. Interrogatory 1-SEC-26
  - e. Interrogatory 4-SEC-169
2. An order suspending such of the remaining schedule for the proceeding (other than the ADR) as may be affected, until this motion is heard and a determination made.
3. Such further and other relief as SEC may request and the OEB may grant.

**THE GROUNDS FOR THE MOTION ARE:**

1. OPUC filed an application with the OEB on April 30, 2025 under section 78 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), seeking approval for changes to the rates that

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<sup>1</sup> All are attached as Appendix A

OPUC charges for the distribution of electricity beginning January 1, 2026. The OEB has assigned matter EB-2025-0014.

2. Pursuant to a decision dated June 24, 2025, the OEB established an Issues List for this proceeding that includes the following issue:

*“7.3. Is the plan to seek additional funding for a new operational and administrative building in a subsequent IRM application appropriate?”*

3. OPUC filed a motion on July 9, 2025 seeking a review of the Commissioners’ decision on the Issues List. On July 15, 2025, the OEB, having reviewed the interrogatories filed relating to the building, dismissed the motion and clarified the rationale for including the issue.

4. SEC is an intervenor in this proceeding. Pursuant to Procedural Order #2, intervenors and OEB Staff were to request further relevant information by way of combined interrogatories to OPUC. OEB Staff filed interrogatories on behalf of all parties on July 10, 2025, and OPUC filed its responses on July 30, 2025. Confidential treatment was sought by OPUC on certain responses, SEC filed a Declaration and Undertaking on August 8, 2025, and OPUC provided unredacted copies of the response to SEC in confidence on August 11, 2025. The OEB has not yet made a determination on the claim of confidentiality. This motion does not refer directly to any of the material on which confidentiality is claimed.

5. Rule 27.03 of the Board’s *Rules of Practice and Procedure*, provides that a party may bring a motion seeking direction from the Board if it is not satisfied that a party has provided a “full and adequate response to an interrogatory.”<sup>2</sup> SEC brings this motion because OPUC has not provided full and adequate responses to certain interrogatories. The information requested is relevant to the issues to be decided in this proceeding.

***Interrogatory I-SEC/Staff/CCMBC-7(b)***

6. The Application has as its foundation a “business transformation plan” developed by an entirely new senior management team. This interrogatory sought the “presentations, plans, strategic memoranda, or other documents describing the initial plan for the modernization of the Applicant’s system, and/or the

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<sup>2</sup> Ontario Energy Board, *Rules of Practice and Procedure* (as revised on October 28, 2016) [“*Rules of Practice and Procedure*”], Rule 27.03

connection, if any, between that plan and the management turnover”. No such documents were provided. Instead, the answer refers to the results of the analysis in the Strategic Plan.

7. In order for parties and the Commissioners to understand the choices being made, the tradeoffs in terms of cost and performance, and the benefits of the business transformation, it is necessary to see the planning documents used in that process. It is possible, of course, that no documentation exists relating to that planning process, but that in itself would be relevant information.

8. The OEB reviews planning documents on a regular basis. In large part, those reviews are about ensuring that the evidence presented by a utility is supported by, and consistent with, their internal analysis, and they have properly considered all relevant factors before asking to spend ratepayer money.

9. The parties could, of course, elicit much of this information through cross-examination and undertakings in an oral hearing. Aside from being inefficient, that also means that followup questions relating to the planning process, the options considered, and the choices made are either prevented, or result in further delays in the regulatory proceeding. The more effective step is to have that information available prior to the hearing.

***Interrogatory 1-SEC/Staff/CCC/PP/CCMBC/VECC-9(a), (f), (g) and (h)***

10. Section (a) of this interrogatory sought business cases, budgets, estimates, forecasts, presentations, plans, memoranda and other documents relating to the new operational and administrative building”. In response, OPUC provided the Class B Estimate and the Cushman & Wakefield market survey, but provided none of the other documents requested.

11. The reason for the refusal can be seen in the responses to (f), (g) and (h). Those sections of the interrogatory sought the options analysis, any benchmarking analysis, and the revenue requirement/bill impact information relating to the new building. All three were refusals, apparently on the basis that the information will be provided in the ICM application, so does not need to be provided in this proceeding.

12. The interesting part of this is that the information is currently available, because substantial spending on this project has already begun. In Restated Table 1-7, seen in the response to 1-SEC/CCMBC/VECC-12, OPUC has filed in confidence the substantial amounts already spent, and expected to be spent in the Test Year and beyond. Without going into the details, the Commissioners can see that the addition of the building radically changes the capital spending plan that had previously been disclosed in the DSP.

13. This leads to two conclusions. First, it is clear that this level of spending could not have been done unless either a) the Applicant didn't bother to do any proper planning, or b) there are numerous documents of the types described in this interrogatory that have not been disclosed.

14. Second, it is clear that the already substantial (+23%) rate increase being sought in this Application is, under the Applicant's plan intended to be followed with an application for a further large rate increase (which can be calculated using the confidential information) within a couple of years. It would be unreasonable for the Applicant to expect the OEB to ignore a large upcoming rate increase in considering whether a large rate increase today is "just and reasonable".

15. SEC also notes that, at the time the ICM application is adjudicated, most of the costs of this building will be sunk costs, bringing into play not only the reasonableness of rate recovery, but also the financial integrity of the utility if the ICM application is denied. This may be part of the reason why OPUC is so eager to defer any consideration of the revenue and bill impacts of the building, benchmarking of its costs (assuming some has been done), and options analysis.

16. SEC submits that, if the effect of non-disclosure of key information about the building is that the Applicant can treat this Application as "only" a 23% rate increase, when it is really, say, a 50% rate increase, that is not appropriate. Similarly, if the Applicant, in filing their capital plan, is not actually planning to add \$65 million of capital assets over the next five years, but, say, twice that, the rationale for that capital plan is essential to the OEB's review. The management, board of directors, and shareholder analysis of why that is a good idea, and how it compares to other utilities, and how it will impact their ratepayers, is critical information.

***Interrogatories 1-SEC-17, 1-SEC-26, and 4-SEC-169***

17. In Interrogatory 1-SEC-17, the Applicant was asked to provide the most recent financial statements for affiliates that provide services to or receive services from the regulated utility. OPUC has declined to provide those on the basis on relevance.

18. In Interrogatory 1-SEC-26, the Applicant was asked to provide details of the deal with Lakefront Utilities to provide services relating to that utility's regulated business through an OPUC affiliate. OPUC has declined to provide those because they claim contracts by affiliates are secret.

19. In Interrogatory 4-SEC-169, the Applicant was asked to provide, for each historical year and the Test Year, “the full breakdown of the fully allocated cost analysis for Shared Services, showing total costs for each category, what costs were allocated where, and the basis for the allocation. Please provide a similar full breakdown for the Corporate Cost Allocation in each year”. OPUC’s response was non-responsive, in that it did not show total costs, nor the costs allocated to each company, nor the basis of the allocation.

20. Part of the business transformation initiative that forms the foundation of this Application has been the recent outsourcing to affiliates of utility functions, such as collections from customers. These are being priced at market. It also involves greater integration of the activities of the regulated utility and the affiliates. Where that is the case, it is common practice for the OEB to look at the financial statements of the affiliates (sometimes in confidence), to ensure that the utility is not hiding excess profits from ratepayers in affiliates. To take the position, as OPUC appears to be doing, that they can shift utility functions out of the utility and then hide the profits they are making from those functions, would be a unique and potentially troubling step. The OEB needs transparency in order to ensure that they are able to protect the ratepayers.

21. Similarly, where a corporate group that includes a regulated utility provides services to another regulated utility, that expertise is by definition expertise in utility functions. To say that it is unrelated to the regulated utility in the corporate group is disingenuous. While it may be that the services being provided to Lakefront Utilities are not generating excess profits, the OEB needs transparency in order to ensure that is the case.

22. Finally, in this corporate group services are being provided back and forth between entities. Corporate groups that include regulated utilities are allowed to do that, and some do, but it is common practice for the OEB to review the basis of the cost allocation and shared services to ensure that the amounts being allocated to the regulated utility are reasonable. That is especially true when the utility is seeking a large rate increase, with more to come, and some of that increase is being driven by corporate cost allocations, shared services, and affiliate outsourcing.

23. SEC therefore submits that these interrogatories should be answered in full as requested.

**THE FOLLOWING DOCUMENTARY MATERIAL AND EVIDENCE WILL BE RELIED UPON  
AT THE HEARING OF THE MOTION:**

1. The Record in EB-2025-0014.
2. Such further and other material as counsel may advise and the OEB may permit.

**August 18, 2025**

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**AND TO: All Intervenors and OEB Staff**

## **APPENDIX A**

### **1-SEC/Staff/CCMBC-7**

**Ref. 1: Exhibit 1, p.8, 9**

#### **Question(s):**

With respect to the fact that “the entire senior management team at Oshawa PUC Networks has turned over since the last Cost of Service rate filing”:

- a) Please provide an explanation for the complete change in the senior management team.
- b) Please file any presentations, plans, strategic memoranda, or other documents describing the initial plan for the modernization of the Applicant’s system, and/or the connection, if any, between that plan and the management turnover.
- c) Please provide any analysis showing the “savings and future benefits” that were planned as a result of the modernization strategy.

#### **Oshawa Power Response**

- a) The Organization has undergone significant structural change at the leadership level to adapt and modernize in Ontario’s evolving energy sector. Such evolution required leadership change at the management level, all which has been managed with appropriate Board guidance and legal advice, to ensure customer focus, strong processes and collaborative policy adoption.
- b) The plans for modernization of Oshawa Power’s system were developed by the new leadership following the management turnover. The plans are documented in the 2026-2030 Strategic Plan (Exhibit 1, Attachment 1-2) and the 2025-2030 Strategic Direction for the Oshawa PUC Networks Group of Companies, see 1-SEC/PP-27, Attachment 1-1.
- c) Savings and future benefits that are planned as a result of the modernization strategy are included in the strategic documents noted in b). In both documents, desired outcomes and measures of success are described. The IT Business Transformation Strategy (Exhibit 1, Attachment 1-4) includes strategic priorities for development, with timelines for improvements noted on p.10.

### **1-SEC/Staff/CCC/PP/CCMBC/VECC-9**

**Ref. 1: Exhibit 1, p.10**

**Ref. 2: Exhibit 2, p.53, 141**

#### **Question(s):**

- a) Please provide all business cases, budgets, estimates, forecasts, presentations, plans, memoranda, or other documents relating to the “new operational & administrative building in the North of its service territory”, or to the land purchase for that purpose.

- ...f) Please discuss what options Oshawa PUC Networks had considered before it purchased land for its new administrative and operational facility (e.g., new lease, purchase of an existing building, etc.).
- g) Please provide any benchmarking analysis completed for the proposed new administrative and operational facility relative to other recent similar facilities constructed by other LDCs.
- h) Please provide an estimate of the annual revenue requirement impact of the new administrative and operational facility and the related distribution bill impact for all rate classes after the asset is placed in service.

#### **Oshawa Power Response**

a) Pursuant to the decision of the OEB on Oshawa Power's motion for determination of threshold question related to issue 7.3, Oshawa Power is providing current estimated forecasts of its new building and land costs. As attached as Attachment 1-2, Oshawa Power received a Class B Estimate from its independent consultant A.W. Hooker on June 4, 2025 (subsequent to the filing of this application) that estimates the construction costs based on design information received to date. The accuracy of the estimate is intended to be +/- 10% to 15%. A.W. Hooker independently estimates the total hard construction cost for the building to be approximately [REDACTED]. Oshawa Power recognizes customer concerns regarding increasing electricity costs and remains committed to maintaining superior cost performance compared to other LDCs. Oshawa Power has been focused on value engineering the new building to manage costs closely, which is reflected in the fact that estimated building costs have been reduced since the preliminary figures used for Customer Engagement on the Distribution System Plan (see PDF page 282 of Exhibit 1). Oshawa Power notes that the tariff trade dispute between the United States in Canada may result in substantial increases to construction costs for some building components, especially as a result of 50% tariff of copper and 25% on steel and aluminum. As attached as Attachment 1-3, Oshawa Power retained Cushman & Wakefield to assist with a market search and site analysis within the municipal Oshawa boundary to determine appropriate, cost effective and timely occupancy of a new location. Cushman & Wakefield evaluated a variety of options for land acquisition, including new construction with a land lease, renovating an existing facility, new construction with land purchase, and so on.

Cushman & Wakefield states that industrial property with office components are in high demand in the region with vacancy rates between 2-5%. The specific requirements for Oshawa Power operations, which include office, garage, warehouse and a significant amount of outdoor storage, made finding a suitable property that can be modified in a cost-effective manner to be extremely difficult. Significant demand for industrial property in this region is reflected in elevated purchase prices. The land for the building was purchased for approximately \$11.4M.

The above attachments reflect the best available information Oshawa Power has at this time with respect to the current capital construction expenditures for the new facility which exclude such costs as furniture & equipment, municipal fees, as well as consultants. Oshawa Power expects that total costs for the new facility will continue to change in advance of the ICM application, especially given the ongoing and rapidly evolving trade dispute between the United States and Canada. It is for this reason the estimated forecast costs of the new building are to be considered preliminary and do not prejudice any updates or changes that may be incorporated into a future ICM application. Oshawa Power will file all required information to support a future ICM application at that time.



...f) Please see the Cushman & Wakefield report provided in response to question a), Attachment 1-3. Options analysis relating to the building will be provided in the ICM application.

g) Please see response to question a). Benchmarking analysis relating to the building will be provided in the ICM application.

h) Please see response to a). Annual revenue requirement and bill impacts relating to the building will be provided in the ICM application. Moreover, Oshawa Power does not have adequate evidence at this time to provide fair and reasonable estimates of such annual revenue requirement and bill impacts.

#### **1-SEC-17**

**Ref. 1: Exhibit 1, pp.44-45**

**Question(s):**

Please provide the most recent financial statements (including audited FS) for:

- a. Oshawa Power and Utilities Corporation
- b. Oshawa PUC Energy Services Inc.
- c. Oshawa PUC Services Inc.
- d. 2252112 Ontario Inc.
- e. 2720665 Ontario Inc.
- f. 2825909 Ontario Inc.
- g. 2825407 Ontario inc.
- h. Any other affiliated corporation or other entity (such as a partnership) that has business dealings with, or provides services to or receives services from, the Applicant)

#### **Oshawa Power Response**

Oshawa Power's affiliates are not regulated by the OEB and are separate legal entities. The information requested has no semblance of relevance to the matters at issue in this Application.

#### **1-SEC-26**

**Ref. 1: Exhibit 1, p.118**

**Question(s):**

Please provide copies of all agreements, MOUs, letters of intent, or similar documents between Lakefront Utilities and the Applicant or any of its affiliates.

#### **Oshawa Power Response**

Please see Attachment 1-7. Contracts between the affiliates of Oshawa Power (which are all unregulated) and Lakefront Utilities Inc. are outside the purview of this application. Therefore, this question is not relevant to this Application.

#### **4-SEC-169**

**Ref. 1: Exhibit 4, pp.100-104**

**Question(s):**

For each year from 2021 to 2026, please provide the full breakdown of the fully allocated costs analysis for Shared Services, showing total costs for each category, what costs were allocated where, and the basis of the allocation. Please provide a similar full breakdown for the Corporate Cost Allocation in each year.

# Oshawa Power Response

See Table below.

Question(s):  
a) For each year from 2021 to 2026, please provide the full breakdown of the fully allocated costs analysis for Shared Services, showing total costs for each category, what costs were allocated where, and the basis of the allocation.  
<See below tables>  
Please provide a similar full breakdown for the Corporate Cost Allocation in each year. <Please refer to 4-CCC-171>

Year: 2021

Shared Services

Name of Company		Service Offered	Pricing Methodology	Labour	Labour Overhead	Basis of Allocation	Price for the Service	Total Cost	%
From	To						\$		
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	136,256	81,754	time allocated to affiliate	218,009	311,550	70%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	80,534	48,321	time allocated to affiliate	128,855	184,143	70%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	128,579	77,147	time allocated to affiliate	205,726	293,996	70%
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	43,891	26,335	time allocated to affiliate	70,226	311,550	23%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	25,942	15,565	time allocated to affiliate	41,507	184,143	23%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	41,416	24,851	time allocated to affiliate	66,269	293,996	23%
Oshawa Power	OPUC	Strategic Oversight	Fully Allocated Costs	14,572	8,743	time allocated to affiliate	23,315	311,550	7%
Oshawa Power	OPUC	Shared Finance Services	Fully Allocated Costs	8,613	5,168	time allocated to affiliate	13,780	184,143	7%
Oshawa Power	OPUC	Other Shared Services	Fully Allocated Costs	13,751	8,251	time allocated to affiliate	22,001	293,996	7%
Oshawa Power	2252112 Inc	Admin Fees	Fully Allocated Costs	16,281	9,768	time allocated to affiliate	26,049	26,049	100%

Total Costs	
Strategic Oversight	311,550
Shared Finance Services	184,143
Other Shared Services	293,996
Admin Fees	26,049
	815,738

Year: 2022

Shared Services

Name of Company		Service Offered	Pricing Methodology	Labour	Labour Overhead	Basis of Allocation	Price for the Service	Total Cost	%
From	To						\$		
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	139,406	83,644	time allocated to affiliate	223,049	288,628	77%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	166,789	100,073	time allocated to affiliate	266,862	345,322	77%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	94,247	56,548	time allocated to affiliate	150,795	195,130	77%
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	21,394	12,836	time allocated to affiliate	34,230	288,628	12%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	25,596	15,356	time allocated to affiliate	40,954	345,322	12%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	14,463	8,678	time allocated to affiliate	23,142	195,130	12%
Oshawa Power	OPUC	Strategic Oversight	Fully Allocated Costs	19,593	11,756	time allocated to affiliate	31,348	288,628	11%
Oshawa Power	OPUC	Shared Finance Services	Fully Allocated Costs	23,441	14,065	time allocated to affiliate	37,506	345,322	11%
Oshawa Power	OPUC	Other Shared Services	Fully Allocated Costs	13,246	7,948	time allocated to affiliate	21,193	195,130	11%
Oshawa Power	2252112 Inc	Admin Fees	Fully Allocated Costs	25,635	15,381	time allocated to affiliate	41,016	47,400	87%
Oshawa Power	2825909 Ontario Inc	Admin Fees	Fully Allocated Costs	3,990	2,394	time allocated to affiliate	6,384		

Total Costs	
Strategic Oversight	288,628
Shared Finance Services	345,322
Other Shared Services	195,130
Admin Fees	47,400
	876,480

Year: 2023

Shared Services

Name of Company		Service Offered	Pricing Methodology	Labour	Labour Overhead	Basis of Allocation	Price for the Service	Total Cost	%
From	To						\$		
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	90,054	54,032	time allocated to affiliate	144,087	195,436	74%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	237,119	142,271	time allocated to affiliate	379,390	514,598	74%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	111,084	65,651	time allocated to affiliate	177,735	241,077	74%
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	20,410	12,246	time allocated to affiliate	32,657	195,436	17%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	53,742	32,245	time allocated to affiliate	85,987	514,598	17%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	25,177	15,106	time allocated to affiliate	40,283	241,077	17%
Oshawa Power	OPUC	Strategic Oversight	Fully Allocated Costs	11,683	7,010	time allocated to affiliate	18,693	195,436	10%
Oshawa Power	OPUC	Shared Finance Services	Fully Allocated Costs	30,763	18,458	time allocated to affiliate	49,220	514,598	10%
Oshawa Power	OPUC	Other Shared Services	Fully Allocated Costs	14,412	8,647	time allocated to affiliate	23,059	241,077	10%
Oshawa Power	2252112 Inc	Admin Fees	Fully Allocated Costs	30,020	16,012	time allocated to affiliate	46,031	46,031	100%

Total Costs	
Service	
Strategic Oversight	195,436
Shared Finance Services	514,598
Other Shared Services	241,077
Admin Fees	46,031
	997,142

Year: 2024

Shared Services

Name of Company		Service Offered	Pricing Methodology	Labour	Labour Overhead	Basis of Allocation	Price for the Service	Total Cost	%
From	To						\$		
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	85,101.47	51,060.88	time allocated to affiliate	136,162	336,806	40%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	103,651.22	62,190.73	time allocated to affiliate	165,842	242,871	68%
Oshawa Power	OPUCES	Shared IT Services	Fully Allocated Costs	26,926.47	16,155.88	time allocated to affiliate	43,082	43,082	100%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	35,982.19	21,589.31	time allocated to affiliate	57,572	142,782	40%
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	42,711.24	25,626.74	time allocated to affiliate	68,338	336,806	20%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	25,785.48	15,471.29	time allocated to affiliate	41,257	242,871	17%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	14,630.53	8,778.32	time allocated to affiliate	23,409	142,782	16%
Oshawa Power	OPUC	Strategic Oversight	Fully Allocated Costs	82,690.74	49,614.44	time allocated to affiliate	132,305	336,806	39%
Oshawa Power	OPUC	Shared Finance Services	Fully Allocated Costs	13,484.66	8,090.81	time allocated to affiliate	21,575	242,871	9%
Oshawa Power	OPUC	Other Shared Services	Fully Allocated Costs	16,752.28	10,051.37	time allocated to affiliate	26,804	142,782	19%
Oshawa Power	2252112 Inc	Admin Fees	Fully Allocated Costs	10,100.98	6,060.59	time allocated to affiliate	16,162	16,162	100%
Oshawa Power	2252407 Inc	Management	Fully Allocated Costs	33,311.67	19,967.00	time allocated to affiliate	53,299	53,299	100%
Oshawa Power	2252407 Inc	Shared Finance Services	Fully Allocated Costs	8,872.96	5,323.78	time allocated to affiliate	14,197	242,871	6%
Oshawa Power	2252407 Inc	Other Shared Services	Fully Allocated Costs	21,873.80	13,124.28	time allocated to affiliate	34,998	142,782	25%

Service	Total Costs
Strategic Oversight	336,806
Shared Finance Services	242,871
Shared IT Services	43,082
Other Shared Services	142,782
Management	53,299
Admin Fees	16,162
	<u>835,001</u>

Year: 2025

Shared Services

Name of Company		Service Offered	Pricing Methodology	Labour	Labour Overhead	Basis of Allocation	Price for the Service	Total Cost	%
From	To						\$		
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	82,569.72	49,541.83	estimate of time allocated to affiliate	132,112	546,151	24%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	60,841.48	36,504.89	estimate of time allocated to affiliate	97,346	244,978	40%
Oshawa Power	OPUCES	Business Development Support	Fully Allocated Costs	26,650.99	15,990.59	estimate of time allocated to affiliate	42,642	42,642	100%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	40,569.29	24,341.57	estimate of time allocated to affiliate	64,911	193,294	34%
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	50,963.98	30,578.39	estimate of time allocated to affiliate	81,542	546,151	15%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	12,751.02	7,650.61	estimate of time allocated to affiliate	20,402	244,978	8%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	24,807.83	14,884.70	estimate of time allocated to affiliate	39,693	193,294	21%
Oshawa Power	OPUC	Strategic Oversight	Fully Allocated Costs	84,763.62	50,858.17	estimate of time allocated to affiliate	135,622	546,151	25%
Oshawa Power	OPUC	Shared Finance Services	Fully Allocated Costs	27,293.05	16,375.83	estimate of time allocated to affiliate	43,669	244,978	18%
Oshawa Power	OPUC	Other Shared Services	Fully Allocated Costs	14,624.19	8,774.51	estimate of time allocated to affiliate	23,399	193,294	12%
Oshawa Power	2252112 Inc	Admin Fees	Fully Allocated Costs	13,747.73	8,248.64	estimate of time allocated to affiliate	21,996	21,996	100%
Oshawa Power	2252407 Inc	Strategic Oversight	Fully Allocated Costs	123,047.06	73,828.24	estimate of time allocated to affiliate	196,875	546,151	36%
Oshawa Power	2252407 Inc	Shared Finance Services	Fully Allocated Costs	52,225.72	31,335.43	estimate of time allocated to affiliate	83,561	244,978	34%
Oshawa Power	2252407 Inc	Other Shared Services	Fully Allocated Costs	40,807.74	24,484.64	estimate of time allocated to affiliate	65,292	193,294	34%
Oshawa Power	2252407 Inc	Operational Support	Fully Allocated Costs	108,082.27	64,849.36	estimate of time allocated to affiliate	172,932	172,932	100%

Service	Total Costs
Strategic Oversight	546,151
Shared Finance Services	244,978
Other Shared Services	193,294
Operational Support	172,932
Business Development Support	42,642
Admin Fees	21,996
	<u>1,221,993</u>

Year: 2026

Shared Services

Name of Company		Service Offered	Pricing Methodology	Labour	Labour Overhead	Basis of Allocation	Price for the Service	Total Cost	%
From	To						\$		
Oshawa Power	OPUCES	Strategic Oversight	Fully Allocated Costs	85,958.36	51,575.02	estimate of time allocated to affiliate	137,533	538,681	26%
Oshawa Power	OPUCES	Shared Finance Services	Fully Allocated Costs	62,579.49	37,547.89	estimate of time allocated to affiliate	100,127	251,473	40%
Oshawa Power	OPUCES	Business Development Support	Fully Allocated Costs	27,450.52	16,470.31	estimate of time allocated to affiliate	43,921	43,921	100%
Oshawa Power	OPUCES	Other Shared Services	Fully Allocated Costs	41,786.37	25,071.82	estimate of time allocated to affiliate	66,858	242,015	28%
Oshawa Power	OPUCS	Strategic Oversight	Fully Allocated Costs	52,948.67	31,769.20	estimate of time allocated to affiliate	84,718	538,681	19%
Oshawa Power	OPUCS	Shared Finance Services	Fully Allocated Costs	13,104.47	7,862.68	estimate of time allocated to affiliate	20,967	251,473	8%
Oshawa Power	OPUCS	Other Shared Services	Fully Allocated Costs	25,552.07	15,331.24	estimate of time allocated to affiliate	40,883	242,015	17%
Oshawa Power	OPUC	Strategic Oversight	Fully Allocated Costs	89,321.42	53,592.85	estimate of time allocated to affiliate	142,914	538,681	27%
Oshawa Power	OPUC	Shared Finance Services	Fully Allocated Costs	27,786.85	16,660.11	estimate of time allocated to affiliate	44,427	251,473	18%
Oshawa Power	OPUC	Other Shared Services	Fully Allocated Costs	13,959.50	8,375.75	estimate of time allocated to affiliate	22,335	242,015	9%
Oshawa Power	2252112 Inc	Admin Fees	Fully Allocated Costs	14,145.63	8,487.38	estimate of time allocated to affiliate	22,633	22,633	100%
Oshawa Power	2252407 Inc	Strategic Oversight	Fully Allocated Costs	108,447.32	65,068.39	estimate of time allocated to affiliate	173,516	538,681	32%
Oshawa Power	2252407 Inc	Shared Finance Services	Fully Allocated Costs	53,719.79	32,231.87	estimate of time allocated to affiliate	85,952	251,473	34%
Oshawa Power	2252407 Inc	Other Shared Services	Fully Allocated Costs	69,961.09	41,976.65	estimate of time allocated to affiliate	111,938	242,015	46%
Oshawa Power	2252407 Inc	Operational Support	Fully Allocated Costs	171,662.50	102,997.50	estimate of time allocated to affiliate	274,660	274,660	100%

Service	Total Costs
Strategic Oversight	538,681
Shared Finance Services	251,473
Other Shared Services	242,015
Operational Support	274,660
Business Development Support	43,921
Admin Fees	22,633
	<u>1,375,383</u>