

August 29, 2025

Mr. Ritchie Murray  
Registrar  
Ontario Energy Board  
2300 Yonge St, 27th Floor  
Toronto, ON M4P 1E4

**Re: Vulnerability Assessment & System Hardening Project, EB-2024-0199**

Dear Mr. Murray:

On behalf of the Electricity Distributors Association (EDA), I am writing to express our support of the Ontario Energy Board's (OEB) Vulnerability Assessment and System Hardening (VASH) Report, dated July 31, 2025. This report builds upon the initial Vulnerability Assessment – Draft Report issued in December 2024 and reflects the input that the EDA provided during the consultation. We appreciate the OEB's meaningful engagement with our members and its consideration of the EDA's feedback in developing the final VASH framework.

In particular, we would like to recognize the OEB's incorporation of the following changes into the proposed framework based on our earlier feedback:

- **The Introduction of a Dual-Path Approach:** The decision to offer both a “Generic Option” and a “Custom Option” for distributors' vulnerability assessments is a crucial step. This approach directly addresses the diverse capabilities and existing frameworks within the LDC sector, providing essential flexibility while maintaining a clear set of expectations.
- **The Benefit/Cost Analysis framework that provides flexibility** by allowing LDCs to characterize their projects as Early Retirement, End-of-Life, or Retrofit, and to account for a project's impact type. This ensures the analysis can be tailored to a wide range of system hardening investments.
- **Use of Standardized and Industry-Accepted Data:** The OEB has provided, in the Vulnerability Assessment (VA) Toolkit, on a one-time basis, climate peril projections for wind and ice accretion at locations across Ontario, derived from Canadian Standards Association (“CSA”) and Environment and Climate Change Canada (“ECCC”) data. We are pleased with the emphasis on utilizing industry-accepted data inputs. ECCC and CSA use Representative Concentration Pathway scenarios to consider potential futures, and LDCs have the flexibility to choose other generally accepted climate projection scenarios to model failure projections.
- **Guidance for Asset Categorization and Methodology:** The guidance provided on asset categorization, and the development of the VA Toolkit offers a valuable starting point for LDCs that may not have a formalized process. This guidance, coupled with the flexibility to use a custom approach, strikes a beneficial balance.
- **Implementation Timeline:** The OEB's original intention was to implement changes in applications for 2026 rates. We appreciate that the OEB has reconsidered this timeline, and distributors' filing for 2027 rates will be required to include vulnerability assessment and system hardening analyses on a best-efforts basis.

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We note that the draft report states that the changes will be mandatory for applications for 2028 rates. For the sake of clarity, we wish to confirm that these changes will be mandatory for applications filed in 2027 for 2028 rates.

Further, we value the OEB's commitment to monitor and refine the VASH framework over time. An adaptive approach – where the OEB can learn from the first set of filings and make improvements – aligns with our view that resilience planning will evolve and should remain practical and effective.

Thank you once again for the opportunity to comment on this matter. Should you have any questions or require clarification, please do not hesitate to contact Rudra Mukherji, Senior Regulatory Affairs Advisor, at [rmukherji@eda-on.ca](mailto:rmukherji@eda-on.ca).

Sincerely,

A handwritten signature in black ink, appearing to read "Teresa Sarkesian". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Teresa Sarkesian  
President & Chief Executive Officer