

BY EMAIL and RESS

August 29, 2025

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

Dear Mr. Murray:

EB-2024-0199 Vulnerability Assessment and System Hardening Consultation - Building Owners and Managers Association Toronto's (BOMA Toronto) Comments

Introduction

The Ontario Energy Board (OEB) launched the Vulnerability Assessment and System Hardening (VASH) consultation in June 2024 to develop policies and a framework in response to three directives contained within the Minister's November 2023 Letter of Direction, including:

- Incorporate climate resiliency into local distribution companies' asset and investment planning activities.
- Engage in a regular assessment of the vulnerabilities in their distribution system and operations in the event of severe weather.
- Prioritize value for customers when investing in system enhancements for resilience purposes.

On June 11, 2025, a Minister Directive was issued to the OEB, to support implementation of Energy for Generations - Ontario's Integrated Energy Plan, reinforces the importance of considering frequent and extreme weather impacts on energy infrastructure resilience and encourages the OEB to support electricity distributors in integrating these considerations into their planning frameworks and processes.

On July 31, 2025, the OEB issued a draft version of the complete Vulnerability Assessment and System Hardening Report (VASH Report) for stakeholder comment. This release includes a draft version of the VASH Toolkit, which provides resources to help electricity distributors identify parts of their system most vulnerable to extreme weather and assess

system hardening options using an objective benefit-cost framework. Feedback from stakeholder meetings and written comments on the December 17, 2024 Vulnerability Assessment (VA)– Draft Report have also been incorporated into this release.

BOMA Toronto Comments

BOMA Toronto commends the OEB’s approach to engage industry stakeholders through multiple public sessions. BOMA Toronto supports the July 31, 2025 VASH Draft Report. The proposed framework incorporates important feedback from stakeholders on key elements of this imperative initiative.

Two options for distributors to conduct vulnerability assessment and benefit-cost analysis

BOMA Toronto agrees with the OEB’s two-option approach as it supports the great diversity of distributors in Ontario (i.e. size, urban vs rural, capabilities). The custom option provides flexibility and it allows customized assessments that are more appropriate for certain distributors. The generic option provides standardized methodologies and guidance on sourcing input data, which will be appropriate and helpful for many distributors.

OEB-developed VASH Toolkit

The OEB-developed VASH Toolkit is comprised of the VA Toolkit and the Benefit-Cost Analysis (BCA) Toolkit. The VA Toolkit is an Excel-based model, utilizing standard data tables and vulnerability calculations to assesses vulnerabilities with an asset-based approach, which is consistent with other jurisdictions. The BCA Toolkit provides a generic framework for calculating the lifetime present value of benefits and costs of a project, a benefit-cost ratio and the expected annual and lifetime reduction in customer minutes of interruption. After reviewing the draft VASH Toolkit, BOMA Toronto finds it comprehensive and supportive.

Implementation Timeline – Distribution System Plan Integration

The OEB states that the requirements outlined in the VASH Report are intended to apply on a best-efforts basis for applications filed in 2026 for 2027 rates and will become mandatory for applications filed in 2027 for 2028 rates. BOMA Toronto supports this implementation timeline. Preparing a rebasing application with the new additional VA requirements requires extra effort and this two-stage timeline will provide distributors with some added preparation time.

BOMA Toronto is supportive of the OEB's objectives and approach to consider and define a cost-effective framework to address distribution sector resiliency. We appreciate the opportunity to provide a voice for commercial property owners and operators in Ontario throughout the development of this important initiative.

Respectfully submitted on behalf of BOMA Toronto,

A handwritten signature in black ink, appearing to read "Clement Li".

Clement Li

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