

**Filed on behalf of GridSmartCity
Ontario Energy Board File No. EB-2023-0125**

November 04, 2025

Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON
M4P 1E4

Submitted Via Email: registrar@oeb.ca

RE: EB-2023-0125 – Costs Submission for Phase Two of the Benefit-Cost Analysis Framework for Addressing Electricity System Needs

I. Cost Eligibility and Claim Submission Details

File Number: EB-2023-0125

Consultation: *Benefit-Cost Analysis Framework for Addressing Electricity System Needs – Phase Two*

Activity: Review of draft BCA revisions and submission of written feedback (maximum 10 hours).

Recovery Source: All rate-regulated electricity distributors (as per OEB direction).

Submission Method: Filed via email in searchable PDF format with a digital signature.

II. Introduction

GridSmartCity (“GSC”) respectfully submits this request for cost eligibility and award under section 30 of the *Ontario Energy Board Act, 1998* and the OEB’s Practice Direction on Cost Awards in relation to the *Phase Two consultation on the Benefit-Cost Analysis Framework for Addressing Electricity System Needs (EB-2023-0125)*.

GSC is a cooperative of local electricity distribution companies and industry partners working collaboratively to enhance distribution system performance, innovation, and customer outcomes. GSC’s members include rate-regulated distributors, and an ecosystem of affiliate members in impacted industries. GSC’s work directly supports the development of Distribution System Operator (DSO) capabilities in Ontario.

GSC did not participate in Phase One of the BCA consultation but has been an active participant in the OEB's consultation on DSO Capabilities (re: EB-2025-0060), providing technical and policy input on the integration of Distributed Energy Resources and local system planning.

III. Grounds for Cost Eligibility

Under section 3.03(b) of the *Practice Direction on Cost Awards*, a party is eligible for costs if it “*primarily represents an interest or policy perspective relevant to the Board’s mandate and to the proceeding for which cost award eligibility is sought.*”

GSC’s participation meets this test for the following reasons:

1. **Policy relevance:** GSC represents a collective perspective of LDC and industry partners on developing and implementing BCA methodologies that underpin DSO functionality and DER integration, which are central to this consultation.
2. **Expert contribution:** GSC’s analysis will focus on ensuring the BCA framework’s refinements to the Energy System Test appropriately reflect the distribution-level operational and economic realities of DER deployment. GSC provides a practical perspective focussed on strategic implementation.
3. **Public interest:** By promoting a practical, evidence-based approach to evaluating Non-Wires Solutions (NWS), GSC’s participation will enhance regulatory efficiency and system reliability, benefiting ratepayers and supporting broader energy policy objectives under the Integrated Energy Plan (IEP).

Although some of GSC’s members are regulated distributors (entities typically ineligible for cost awards under section 3.05(b)), GSC itself is an independent collective association, not a regulated distributor, and its participation is on behalf of the collective *as a policy stakeholder*, not as an applicant or regulated entity seeking direct rate recovery. Accordingly, section 3.06 of the Practice Direction applies, which permits eligibility in special circumstances or where a participant’s input provides value in the public interest.

IV. Nature and Scope of Participation

GSC intends to:

1. Review and analyze the draft Phase Two BCA revisions circulated November 26, 2025;
2. Prepare and submit written feedback addressing:
 - o Refinement of the Energy System Test to better capture local system benefits and costs;

- Incorporation of societal impact metrics relevant to distribution-level investments; and
- Alignment of the BCA methodology with the OEB’s emerging DSO framework;

3. Participate in follow-up discussions or workshops if scheduled by the Board.

GSC’s work will ensure that BCA refinements reflect the operational, planning, and investment perspectives of Ontario’s distribution networks.

V. Representation and Cost Claim

GSC will retain Sussex Strategy Group as its policy and regulatory consultant. Work will be led by Patrick Gajos, Vice President & General Counsel at Sussex Strategy Group, who will act as primary representative and advisor, as follows:

Service Provider	Role	Hourly Rate	Estimated Hours	Estimated Total (Before HST)
Patrick Gajos, Sussex Strategy Group	Consultant, LSO Licensee	\$550/hour	Up to 10 hours	\$5,500.00

This hourly rate reflects market rates for senior regulatory and legal professionals of comparable experience. While the OEB’s Cost Award Tariff provides for a maximum of \$330/hour, GSC respectfully requests that the OEB exercise discretion to approve a higher rate recognizing the senior-level expertise and specialized policy support being provided by Mr. Gajos in this limited engagement.

In the alternative, if the Board does not approve a higher rate, GSC will adjust its final claim to conform to the applicable Tariff maximum.

GSC has not accessed any other external funding sources for this consultation.

GSC confirms that it is HST-registered and will include its registration number and HST breakdown in its formal cost claim.

VI. Conclusion

GSC respectfully requests that the Ontario Energy Board:

1. Determine that GridSmartCity is eligible for cost awards under section 30 of the *Ontario Energy Board Act, 1998* and the *Practice Direction on Cost Awards*; and
2. Approve the proposed cost claim for participation in Phase Two of the BCA Framework consultation.

GSC appreciates the opportunity to contribute to this important initiative and looks forward to assisting the OEB in developing a robust, transparent, and practical benefit-cost analysis framework that supports efficient system planning and DER integration.

Submitted by:



[signed electronically]

Patrick Gajos

Vice President & General Counsel

Sussex Strategy Group, on behalf of GridSmartCity

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