



November 13, 2025

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board (“OEB”)
2300 Yonge Street, Suite 2700
P.O. Box 2319
Toronto, ON M4P 1E4

Re: Electricity demand-side management consultation (EB-2025-0156)

CCIC Written Comments on Proposed Framework for Implementation of Local eDSM

Dear Mr. Murray,

We write on behalf of the Canadian Charging Infrastructure Council | Conseil canadien de l’infrastructure recharge (“CCIC”) in respect of the above-noted OEB proceeding. CCIC appreciates the opportunity to participate in this proceeding and to express CCIC’s support for the eDSM Regulatory Working Group’s proposal.

CCIC

By way of background, and as the OEB and the joint IESO-LDC DSM Regulatory Working Group may already be aware, CCIC was formed in April 2025, with a mission to advance 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 eDSM programs in Ontario, including Stream 2.

(1) CCIC support for the Working Group’s Proposed Framework

As the Working Group is aware, in July 2025 the IESO published a *Technical Paper on Electric Vehicles*, which recognized that: (1) Ontario’s electric vehicle (EV) market has been growing and evolving at a rapid pace, with nearly 200,000 EVs registered in the province as of Q3 2024 – representing an estimated annual charging demand of about 700 GWh, or roughly 0.5% of total provincial electricity consumption – and that the IESO projects this number to grow to 11.6 million by 2050; and (2) electrification, including transportation electrification, is a major driver of demand growth, with overall electricity demand in Ontario forecast to rise by 75% by 2050.¹

With respect to EV charging specifically, the Technical Paper concluded that while the current *passive managed charging* approach – for example, using time-of-use and ultra-low overnight rates to incent charging habits – is effective for managing provincial grid impacts in the near term, *long-term active management*, where EV charging is scheduled or adjusted in response to system conditions, will be more effective in managing the cost and reliability impacts of large-scale transportation electrification.²

As a result, CCIC and its members believe it is essential to advance eDSM programs across Ontario. The framework proposed by the Working Group presents a unique opportunity to address the long-term active management challenges identified in the IESO’s July 2025 *Technical Paper on Electric Vehicles* and, amid the accelerating adoption of EVs and charging technologies, to enable and encourage consumers to adopt these technologies in ways that support grid reliability and efficiency. Introducing eDSM measures at the point of technology adoption (*i.e.*, when consumers are selecting and installing new charging equipment) is far more effective than attempting to retrofit or modify existing installations later, as it supports deployment of connected products that are capable of supporting active demand side management from the outset, and helps engender driver participation as they are developing new patterns of behaviour around charging.

CCIC and its members have been closely following and actively participating in the above-noted proceeding and are pleased to provide the following written comments on the *Proposed Framework for Implementation of Local eDSM Report* (the “**Stream 2 Report**”), the OEB Staff questions of the Working Group and the Working Group’s responses to same, as well as

¹ See [IESO Demand & Conservation Planning Technical Paper: Electric Vehicles](#) (July 2025) at 2-3.

² *Id* at 2.



information shared during the Stakeholder Days on October 8-9, 2025. CCIC generally supports the recommendations set out in the *Stream 2 Report*, subject to the specific comments and clarification set out below.

(2) CCIC supports streamlined regulatory pathways and efficient eDSM approvals

CCIC strongly supports the establishment of ambitious targets for eDSM and the ongoing review of program performance to ensure these initiatives deliver measurable value for ratepayers and the grid. To achieve these targets efficiently, CCIC supports the recommendations in the Stream 2 Report and from the Working Group that would allow for a streamlined regulatory pathway, including the development of an OEB eDSM Workform and the use of Delegated Authority for Stream 2 applications, with full OEB panel review required only where an LDC seeks a significant budget extension or scope change that deviates from the approved approach.³

CCIC particularly supports streamlined review for eDSM programs that rely on the standardized energy efficiency and demand-side management measures set out in the IESO's *Measures and Assumptions List* ("MAL"), including deemed energy and peak demand savings and other prescribed technical input assumptions for residential, commercial, and industrial end uses, thereby ensuring consistency with established provincial methodologies and avoiding unnecessary duplication of technical review processes.⁴

CCIC's primary concern is that requiring a full OEB panel review for every individual eDSM initiative would impose unnecessary administrative burden on LDCs, third-party suppliers, and the OEB itself. This would ultimately increase costs to ratepayers and delay program implementation without materially advancing the OEB's core objectives of (i) protecting the interests of consumers with respect to prices and the reliability and quality of electricity service, (ii) promoting economic efficiency and cost-effectiveness, and (iii) facilitating rational expansion of transmission and distribution systems.⁵ A streamlined approval process will therefore enable faster program deployment and greater ratepayer value.

³ See [Stream 2 Report](#) at 1.4, 2, 2.1.1, 2.2.1, 2.2.2, 2.2.6, 2.3.2, 3, and 3.6.

⁴ See [IESO Measures and Assumptions List Technical Supplement](#) (June 2025) at 1.

⁵ *Ontario Energy Board Act, 1998*, SO 1998, c 15, Sched B, 1.



(3) CCIC supports robust evaluation and comprehensive review of program implementation, non-implementation, and uptake barriers

Further, CCIC strongly recommends the ongoing evaluation of eDSM program implementation and performance by LDCs, covering not only initiatives that have been deployed and achieved broad uptake, but also those **not** implemented or that have experienced limited participation.

Consistent with the Stream 2 Report’s emphasis on continuous improvement, transparent reporting, and EM&V, these assessments should identify the underlying drivers of non-implementation or low uptake, including whether compensation or cost-recovery mechanisms for LDCs and third-party suppliers (such as aggregators) are insufficient. By undertaking comprehensive reviews of both action and inaction, the OEB can ensure that incentives are aligned, barriers are removed, and LDCs are encouraged to adopt eDSM solutions where they are more efficient than traditional infrastructure builds, thereby maximizing value for ratepayers and strengthening grid reliability.

(4) CCIC suggests a tailored limitation of funding for entities that have received capital funding from other government programs

CCIC notes that during the Stakeholder Days there was a productive discussion with IESO’s representative regarding proposed limitations on the application of eDSM funding for projects that have received other provincial funding.

CCIC sought clarification as to whether a restriction on participation by technology funded through other government programs would apply to charging stations supported by government programs that provide up-front capital for installation. CCIC appreciated what it understood to be the IESO representative’s clarification that, while the Minister’s Directive may preclude customers from receiving funding from another Ontario government source for the *same measure*, a distinction between up-front capital support measures and *ongoing* operation measures supporting charging station eDSM would be appropriate for eligibility purposes, since “we are then paying for a different service”.⁶

⁶ [OEB Consultation Transcripts Volume 1](#) (October 8, 2025) at 209-210.



CCIC agrees with this interpretation and believes it is consistent with Section G.2(a) of the Directive, which excludes only “those measures promoted through a different program or initiative undertaken by the Government of Ontario or the IESO.”⁷

Charging stations that have received provincial or federal *capital incentives* for installation should nonetheless remain eligible for *ongoing eDSM operational incentives or participation funding*. A one-time capital grant or incentive to support infrastructure deployment typically cannot require ongoing participation in an eDSM program and is therefore distinct from *ongoing operational measures* – such as managed-charging, load-shifting, and demand-response participation – that are at the core of the eDSM framework. Excluding these stations would risk undermining the availability of cost-effective, ready-to-mobilize resources that can provide significant system and ratepayer benefits, thereby reducing the province’s access to valuable demand-side capacity and grid flexibility resources.

CCIC appreciates the opportunity to provide these comments and looks forward to continued engagement with the OEB, the Working Group, and other stakeholders as the eDSM framework is further developed and implemented.

Yours truly,

A handwritten signature in blue ink, appearing to read "Colin Carruthers".

Colin Carruthers, Gilbert’s LLP (counsel for CCIC)

⁷ [Minister’s new eDSM Directive to the IESO](#) (Order in Council 1448/2024, dated November 7, 2024 and amended December 19, 2024).