ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, Schedule B to the Energy Competition Act, 1998, S.O. 1998, c.15 (the "**OEB Act**");

AND IN THE MATTER OF an Application by Oshawa PUC Networks Inc. ("**OPUCN**") for an Order or Orders approving or setting just and reasonable electricity distribution rates and other charges beginning January 1, 2026.

EB-2025-0014

WRITTEN SUBMISSIONS

OF

DISTRIBUTED RESOURCE COALITION

("DRC")

November 28, 2025

OVERVIEW

1. We are counsel to the Distributed Resource Coalition ("**DRC**") in OPUCN's application to the Ontario Energy Board (the "**OEB**" or "**Board**") for an order or orders approving or setting just and reasonable electricity distribution rates and other charges, effective January 1, 2026 (the "**Application**").

2. DRC supports OPUCN's proposed approaches in the Application and the Distribution System Plan ("**DSP**") to address innovation, modernization, and non-wires solutions ("**NWS**"), as it reflects a proactive attempt towards meeting the challenges of the ongoing energy transition. OPUCN's approach addresses the anticipated electricity demand changes and offers important support towards the integration of distributed energy resources ("**DERs**"), which DRC believes is an essential aspect of promoting electrification, decarbonization, reliability, and innovation in accordance with Ontario's energy-related public policy.

3. DRC also believes, however, that there are certain areas where OPUCN's current proposals could be improved, including:

   (a) increased support for multi-unit electric vehicle ("**EV**") residential charging and street charging;

   (b) specifically encouraging support for pilots relating to EV bi-directional charging, including vehicle-to-grid ("**V2G**"), vehicle-to-home ("**V2H**"), and emerging technologies such as virtual power plants ("**VPPs**"), supporting EV aggregation as mobile and dispatchable energy storage; and

   (c) expanding data collection and reporting.

4. Finally, DRC believes that the Board should ensure that OPUCN's has funding that is consistent with the mid-range of comparable utilities to undertake the important grid modernization, DER system access, and EV-and DER-related NWS projects identified in the Application and DSP. The importance of supporting innovation and responding to customer needs, including by increasing energy independence of OPUCN's customers through the adoption of DERs and other technologies, must be strategic and efficient, while also receiving the regulatory direction and funding necessary to pursue them.

5. DRC's submissions are organized as follows:

   (a) Background on DRC;

   (b) DRC's support for OPUCN's goals and rationale for addressing the energy transition;

   (c) DRC's support for OPUCN's proactive approach to innovation and NWS as an important step forward for the adoption of DERs;

   (d) DRC's proposal for identifying additional NWS pilots that prioritize EVs and bi-directional charging;

   (e) DRC's proposal for increased monitoring and reporting requirements; and

   (f) DRC's belief that OPUCN should be entitled to support DER and NWS Projects at an envelope funding level consistent with the funding needed to advance innovation and prudently respond to the energy transition.

A. Relevant Background On DRC

6. DRC is a group of electricity customers and consumers, consisting of end-use residential customers, non-profit organizations, and owners' associations. DRC's members are directly affected by and interested in: (i) optimizing existing energy assets; (ii) efficiently facilitating the integration of existing and innovative DERs, including EVs, to achieve customer and grid solutions; and (iii) providing input on direct customer needs and local distribution company opportunities relating to EVs. DRC's members for this proceeding include the Electric Vehicle Society ("**EVS**") and Plug'n Drive ("**PnD**").

7. DRC represents end-use residential customers with DERs that may act as producer-consumers, or "prosumers", in a bi-directional electricity grid. It is the only intervenor before the Board in this Application that is focused squarely on innovative solutions and the new context of electricity distribution that is, and will be, significantly impacted by DERs.

8. DRC therefore believes that it offers unique and significant expertise on DERs and the innovation activities, infrastructure, and funding necessary to support their integration into OPUCN's distribution system.

B. *DRC Supports OPUCN's Goals and Rationale for Addressing the Energy Transition*

9. DRC strongly supports OPUCN's recognition that the energy transition is underway and that electricity distributors are "experiencing a period of immense change"[1] and increased "uncertainty given the potential for increased electricity demand.[2]

10. OPUCN notes the increasing adoption of EVs in its service territory, including a "53% year-over-year increase in the number of battery electric and plug in hybrid vehicles, with over 2,100 such vehicles now attributed to Oshawa's postal codes".[3] Similarly, at the oral hearing, Mr. Ganapathy confirmed that there has been an increase in EV ownership and electrification demand in OPUCN's service territory in line with broader provincial and industry trends.[4]

11. Recent Letters of Direction from Ontario's Minister of Energy support the understanding that Ontario has entered into a period of energy transition in which fundamental change will take place. For example, the Minister of Energy's October 2022 Letter of Direction articulated the Ontario Government's "vision for the energy system in which Ontario leverages its clean energy grid to promote electrification and job creation while continually enhancing reliability, resiliency and customer choice."[5]

12. The promotion of electrification offers extensive benefits for Ontario. DRC firmly believes that electrification supports a reliable energy sector that responds to the energy needs of Ontario and OPUCN's customers in a way that is more reliable, affordable, and sustainable, all while increasing customer energy independence and choice.

13. DERs, in particular, provide significant benefits in terms of reliability, flexibility, sustainability, and affordability for Ontario's electricity market. These benefits continue to be demonstrated as more electricity customers, grid operators, and service providers consider and adopt DERs (i.e., NWS) to meet on-site electricity demand, fulfill local electricity needs and provide wholesale market services (i.e., capacity, energy and ancillary services).[6]

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[1] Application, Exhibit 1, Attachment 1 – 14, p. 10.
[2] Application, Exhibit 2, Appendix A, p. 4.
[3] *Ibid*., p. 11.
[4] Oral Hearing, Tr. v.2, p. 2.
[5] Ministry of Energy, *Letter of Direction from the Minister of Energy to the Chair of the OEB Board of Directors* (October 21, 2022).
[6] IESO, "Ontario's Distributed Energy Resources (DER) Potential Study, Volume I: Results and Recommendations", (28 September 2022), p. 1.

14. Ontario's Ministry of Energy of Mines recently provided increased support and direction for "greater participation in the energy system, including enabling the cost-effective deployment of [DERs]"[7], and this supports the objective of the Government of Ontario to make "energy affordable and empowering customers to participate in the energy system through [DERs]".[8]

15. The IESO has consistently expressed the view that DERs offer extensive benefits for Ontario's energy sector. A recent IESO study notes that DERs have been demonstrated to serve as a cost-effective solution for avoiding or deferring investment needs in the transmission and distribution system in many jurisdictions across North America.[9]

16. The IESO has also identified the following benefits of DER adoption in Ontario:

    (a) reduce reliance on the provincial electricity grid by supplying some (or all) of the energy needed for a home, facility or business, which helps lower electricity bills;

    (b) can be located close to urban centres, which limits (or avoids) the need for new or upgraded transmission lines; and

    (c) can be connected to the local or provincial grid, providing back-up power during emergencies.[10]

17. DERs, including behind-the-meter storage and V2G and V2H systems, and aggregated EV systems through emerging technology applications like VPPs, are key decentralized, customer-driven energy storage and supply solutions. With the anticipated electrification and energy transition, EVs will increasingly serve as mobile energy storage assets that can discharge power back to the grid (V2G and VPP) or support home and building energy needs (V2H). These technologies have significant potential to enhance OPUCN's distribution system flexibility, improve resilience, and optimize local electricity in OPUCN's service territory.[11]

18. Nevertheless, the promotion of electrification and the integration of technologies like DERs represents a massive undertaking, requiring bold efforts across Ontario's energy sector.

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[7] Minister of Energy and Mines, *Directive regarding the implementation of the Government of Ontario's Integrated Energy Plan (Issued under subsection 25.29 (1) of the Electricity Act, 1998)*, (June 12, 2025), p. 4.
[8] *Ibid*., p. 7.
[9] IESO, *DER Potential Study*, p. 14.
[10] IESO, "Distributed Energy Resources", (online).
[11] See also DRC's comments (July 22, 2025) in EB-2025-0060, supporting a greater role of DERs and EVs through developing DSO capabilities.

Ontario and OPUCN must be proactive to achieve the positive outcomes that electrification offers, and a proactive approach necessarily entails support for innovation, as well as support for utilities that seek to innovate, as an essential core of this proactive approach.

19. A proactive approach is not only in the long-term interests of Ontario ratepayers, it's also entirely consistent with section 1 of the OEB Act, which sets out the priority of facilitating innovation in the electricity sector as one of the Board's four central objectives.

C. OPUCN's Approach to NWS Is an Important Step Forward for the Adoption of DERs

20. Utilities like OPUCN must take a proactive approach when it comes to innovation, grid modernization, and responding to the energy transition. It is essential for utilities to explore what new technologies are best suited to the unique circumstances they face, and be supported in adopting new and emerging technologies with significant benefits to ratepayers.

21. The proposed investments in grid modernization and system access along with the proposed NWS projects in the DSP, demonstrate the potential benefits of the wider adoption of DERs, including deferring costly infrastructure upgrades and reducing rates and customer costs. The proposed projects and investments are also needed to advance these benefits during the rate term and prepare the system for increased electricity demand in accordance with the energy transition. For example, Mr. Ganapathy noted the importance of the advancing the proposed NWS projects during this rate period to mitigate anticipated risks to customers and OPUCN's distribution system in the future:

> A. GANAPATHY: We state this a little more elaborately in Appendix A of the business case for non-wires solutions. However, for non-wires solutions to be beneficial, it needs to be started at an early enough stage for it to be able to offset traditional infrastructure replacements, which is why it needs to be done within this rate period.
>
> It doesn't directly mitigate risk within this rate period, but it is necessary in order to mitigate risks beyond it.[12]

22. The proactive approach identified by OPUCN toward innovation and NWS is crucial for the expanded adoption of DERs due to the unique challenges and opportunities they present. OPUCN must adapt to the specific needs of their service areas, and early-stage, exploratory

[12] Oral Hearing, Tr. v.2, p. 5.

NWS projects that may have large, long-term benefits for the utility, ratepayers, and other stakeholders, should be encouraged and supported.

23. Enabling innovation and NWS ensures that OPUCN is able to address unique energy system and infrastructure challenges that it faces such as balancing localized energy generation with local demand, improving reliability, and facilitating load growth, especially in relation to DERs and EVs. This is essential for mitigating OPUCN's anticipated climate and electricity demand risks, as well as ensuring that DER solutions not only meet immediate system needs but also contribute to long-term sustainability and affordability.

24. As affirmed by Mr. Ganapathy during the oral hearing, delivering the innovation, modernization, and NWS projects identified in the Application and DSP will mitigate electricity demand risks:

D. VOLLMER:	Okay. Would you agree that Oshawa Power has an important role in ensuring safe and reliable connections for these technologies and others such as EV charging infrastructure and DERs in its service territory?
A. GANAPATHY:	Yes. As the LDC, we would have to treat every customer equally, and these types of technologies would fall under that, so yes.
D. VOLLMER:	So the evidence, and we talked about it today, provides that Oshawa will use non-wires solutions to mitigate faster-than-expected EV adoption. How confident are you that the approaches and projects identified in the DSP can be deployed quickly enough if adoption accelerates during the rate period?
A. GANAPATHY:	It is early to say how much growth EV is expected to take off within this rate period. However, this is a reasonable approach to being able to accommodates those loads beyond the 2030 period. For what we assume is a reasonable growth, we follow the OEB's load forecasting guidelines and work with the GTA East planning group.[13]

25. DRC also believes that OPUCN's proposed NWS projects will enable testing and evaluation to take place at relatively smaller scales, reducing risks and providing potential opportunities to scale initiatives should the identified NWS projects prove successful. In addition, the proposed projects will enable OPUCN to evaluate emerging technologies over the rate term, which can be used to inform future NWS projects and better respond to new and existing customer needs. This reduces the risks associated with large-scale deployments while still offering the opportunity to gather valuable insights regarding emerging technologies. NWS

[13] Oral Hearing, Tr. v.2, pp. 9-10.

pilot projects can test different DER configurations and distribution strategies, providing data that can inform whether these initiatives should be expanded into full-scale operational programs or provide more localized benefits and energy solutions to OPUCN's customers.

26. DER-focused pilot projects also offer a relatively low-risk approach that is essential for exploring new and emerging technological solutions and ensuring their viability before committing to broader implementation, benefiting both ratepayers and the distribution system.

D. DRC Support Identifying Additional NWS Pilots that Prioritize EVs and Bi-directional Charging

27. DRC supports each of the NWS projects identified in the Application and DPS, including:

    (a) **Managed Residential EV Charging** by offering an incentive for EV owners using level 2 charging at home to use a software and telematics based managed EV charging app.

    (b) **Northwood Business Park and Thornton Transit Electrification Embedded Low Carbon Smart Grids** that will use the cost benefit evaluation process to review options for collaborating on the sizing and functionality of the distributed energy resources being implemented in the grid, in order to procure, at an appropriate price, capacity, redundancy and/or load optimization services.

    (c) **Incremental Incentives for Save On Energy Solar Energy Management Systems** to monitor uptake of solar energy storage implementation within its service territory and, if appropriate, design/offer incentives for residential customers to reserve capacity for load management activities.

    (d) **Port of Oshawa Battery Energy Storage Solution** to defer or avoid the need for a new transmission station to feed the Port of Oshawa through collaborating on a multi-investor battery energy storage project.

28. However, DRC believes the DSP and proposed NWS projects could be expanded to better reflect growing EV and DER adoption in OPUCN's service territory and the many associated system-wide and customer benefits of DERs and EVs. For example, PND's report on the

costs and benefits of EVs for Ontario's electricity grid[14] (the "**PnD Report**") found that Ontario's electricity system can obtain $28,000 worth of benefits over the 13-year life of every EV participating in mobile storage. The PnD Report found that "mobile storage reduces daytime demand, avoiding the use of natural gas, and makes more efficient use [of] Ontario's base-load hydro and nuclear resources."[15] Further, funding mobile storage for use at night could generate $15,000 worth of savings per participating EV.[16]

29. Bi-directional EV charging is a key tool in reducing both costs and emissions in Ontario's energy system. The PnD Report highlights several anticipated benefits related to using EVs as mobile storage through bi-directional charging.[17] By discharging EV batteries during the day, grid demand can be reduced, further reducing reliance on natural gas-fired generation. This reduction in natural gas demand leads to lower system costs as less gas is purchased. The study notes that new and shifted energy demand is created at night, when EVs are charging, providing revenue for the system, especially if the energy comes from Ontario's hydro and nuclear base-loads, which have fixed operational costs.

30. Furthermore, bi-directional charging allows cleaner night-time electricity to displace natural gas-fired generation during the day, reducing greenhouse gas emissions and avoiding any applicable emission pricing and added costs associated with natural gas generation.

31. Integrating second life EV batteries, which are significantly cheaper than new batteries, into DER solutions "could provide lower cost options for displacing natural gas-fired generation" with each EV potentially resulting in "$11,300 of savings for the electricity system when integrating DER resources to reduce Ontario's GHG emissions."[18]

32. The significant amount of system benefits as a result of the wider adoption of EV batteries as DER solutions "could be shared with either EV owners, workplace buildings, or both in order to enable business models that would unlock this value."[19] There is also the potential for $129 million per year of benefits, including $25 million per year of potential mobile storage benefits from discharging EV batteries during the day to reduce daytime demand

[14] Plug'n Drive, *EV Batteries Value Proposition for Ontario's Electricity Grid and EV Owners*, (July 2020).
[15] *Ibid*., p. 37
[16] *Ibid*.
[17] *Ibid*., p. 33.
[18] *Ibid*., p. 37
[19] *Ibid*.

on the grid, displacing costly natural gas generation, and creating new night-time demand and revenue.[20]

33. In order to support the identification of EV- and DER-related pilots and projects that could bring significant benefits to OPUCN's distribution system and customers, DRC believes that three pilots should be added to OPUCN's list of NWS projects:

    (a) **Multi-unit residential charging**. There are currently no universal regulations requiring EV readiness in multi-unit residential buildings in Oshawa, where a large percentage of the city's population lives. This creates a real risk that ratepayers will face higher rates over the long term, or complete exclusion from reliable access to EV charging, since retrofits are far more costly than the cost of installation at the time of construction. OPUCN should explore innovation in multi-unit residential charging, including:

        (i) community charging for those in multi-unit residences currently without reliable access;

        (ii) initiatives, such as retrofit pilot projects, that will increase and improve access in multi-unit residences and overcome existing challenges relating to the cost of retrofits; and

        (iii) pilots that explore best practices in EV charging for the purposes of recommending their inclusion in applicable building codes.

    (b) **Bring your own cord ("BYOC") street charging**. BYOC charging can assist OPUCN customers in areas where space and access are limited or where they lack private driveways or garages. A BYOC pilot would address the growing demand for convenient, curbside charging while helping OPUCN avoid complex utility upgrades. Such a pilot would speed up the deployment of EV charging infrastructure compared to traditional charges and may also improve the reliability of the charging network, reduce maintenance costs, and allow chargers to be

[20] *Ibid*., pp. 32-33.

integrated into existing infrastructure, such as streetlights or building exteriors, making OPUCN's charging infrastructure system less intrusive.[21]

(c) **A bidirectional V2G/V2H or VPP pilot**. A technical briefing prepared by Dunsky Energy + Climate Advisors ("**Dunsky**") for the Canadian Electric School Bus Alliance notes the following:

(i) "[School buses] spend 80% of weekdays during the school year sitting idle, and for nearly 50% of the year they're not used at all. The potential to harness the energy stored in these mobile batteries is significant, provided this downtime aligns with periods when V2G resources would be beneficial to the grid."[22]

A bidirectional pilot, such as an electric school bus pilot, or V2G and VPP opportunities and pilots with Metrolinx and/or Durham Region Transits,[23] would enable OPUCN to realize financial and energy benefits. For example, Dunsky estimated the following annual V2G revenue potential for utilities in Ontario stemming from (i) avoided capacity, (ii) arbitrage, and (iii) ancillary (operating reserve, frequency regulation, voltage support, blackout start):[24]

2025	2026	2027	2028	2029	2030
$3,120	$3,170	$3,210	$3,250	$3,290	$3,340

34. DRC therefore requests that any Board approvals of the Application include the express condition that OPUCN must investigate and consider developing pilots for multi-unit residential charging, BYOC street charging, and a bi-directional pilot among its priority NWS project identification and pilots.

[21] U.S. Department of Energy, "Community Charging: Emerging Multifamily, Curbside, and Multimodal Practices", (February 2024), *Joint Office of Energy and Transportation*, pp. 15-16. [https://driveelectric.gov/files/community-emobility-charging.pdf]
[22] Canadian Electric School Bus Alliance, "Vehicle-to-Grid (V2G) and Electric School Buses", (August 2023), p.7.
[23] See Application, Exhibit 2, DSP, p. 25 where OPUCN discusses bus electrification pilots identified by Metrolinx and DRT.
[24] CESB, *V2G and Electric School Buses*, p. 7.

E. ***DRC Proposes OPUCN Should Have Additional Monitoring and Reporting Requirements***

35. DRC believes that OPUCN should be required to report on NWS project identification, development, and delivery so as to ensure a high degree of transparency and to support the credibility of the selected projects and OPUCN's approach to NWS programming and projects.

36. Accordingly, DRC proposes that the Board make it a condition of approval that OPUCN be required to report on the following information in its next Cost of Service application:

    (a) **NWS Report**. An NWS report, which has been subjected to input, review and approval by relevant stakeholders, providing any relevant information and data resulting from the identification, development, and delivery of all NWS projects considered and approved or rejected, including the proposed projects identified in paragraph 33, during the rate term so that stakeholders, including other utilities, and the Board can benefit from the lessons learned and conduct their own analysis using the data.

    (b) **Publicly Available Project Results**. NWS project information and results will be publicly disclosed on OPUCN's website, subject to confidentiality claims for which OPUCN may apply to the OEB.

    (c) **Performance Metrics**. NWS project results and reporting should include the following performance metrics for each NWS project to be included in OPUCN's next cost of service application, as applicable:

        (i) customer cost savings impacts;

        (ii) improvements to energy affordability;

        (iii) reliability impacts;

        (iv) accessibility impacts;

        (v) GHG reduction impacts (scope 1, 2 and 3), using the GHG Protocol where applicable; and

(vi) cybersecurity impacts.

37. DRC believes that including these additional reporting requirements in OPUCN's next Cost of Service application will greatly improve transparency and support other utilities and stakeholders in assessing the benefits of NWS projects and applying the learnings to their own project identification and delivery processes, benefitting not only OPUCN's customers but all ratepayers more generally.

F. ***OPUCN Should Be Enabled to Support DER and NWS Projects at an Envelope Funding Level Consistent with the Funding Needed to Advance Innovation and Prudently Respond to the Energy Transition***

38. DRC believes that the importance of innovation in the energy sector means that utilities should be supported in pursing funding that responds to the energy transition and defers capital spending and expensive infrastructure upgrades through the strategic pursuit of NWS, and that utilities should not be overly conservative and excessively cost-conscious in delivering NWS pilots to determine wider system benefits.

39. DRC notes the significant divergence between OPUCN and many of other intervenors in this proceeding regarding the significant rate increases that would result from the Application as filed. However, DRC wishes to highlight the relatively low cost of many of the NWS projects – below the $2 million threshold as identified in the DSP[25] – and maintains that an assessment of the prudence of the capital funding envelope must take into account the many system, customer, and environmental benefits that would result from these projects and ensure that there is adequate funding so as to ensure that OPUCN is able to advance innovative projects to the benefit of its customers during the rate term.

40. Maintaining flexibility to implement NWS projects and other DER-related investments depends, at least in part, on approval of the capital funding envelope requested in the DSP, with Mr. Ganapathy noting at the oral hearing that delays in investments could result in higher costs for ratepayers:

> D. VOLLMER: Would you agree that part of the purpose of the DSP is to mitigate those risks?
>
> …

[25] See Application, Exhibit 2, Appendix A, pp. 12-15, for total costs for each project.

A. GANAPATHY: That is correct.

D. VOLLMER: All right. And then a reduction in capital funding for the DSP could affect Oshawa's ability to manage those risks during the rate period and beyond?

A. GANAPATHY: More emphasis on the "beyond," but yes.

D. VOLLMER: Okay. And similarly, a decision by Oshawa to no longer pursue projects such as the identified non-wires solution initiative could also increase those risks?

A. GANAPATHY: That is correct.[26]

41. Sufficient support and funding for innovation is essential for enabling the wider adoption of DERs that can effectively integrate into OPUCN's distribution system, reducing reliance on centralized generation, and ultimately providing cost savings and greater resilience to the distribution system, in accordance with provincial policy goals. However, delaying or deferring such projects limits the benefits to customers, and risks increasing costs to ratepayers in an accelerated energy transition:

D. VOLLMER: ... Would you agree that there is value for the company and its customers to identify and invest in projects that support reliability, customer service, and cost control as electrification grows, for example, some of the EV and DER-related elements, the modernization initiatives, and innovation projects described in the DSP?

A. GANAPATHY: Yes.

D. VOLLMER: And deferring those investments and projects could increase future costs, particularly if load growth related to DERs and EVs accelerates faster than expected?

A. GANAPATHY: Correct.[27]

42. DRC is highly supportive of the outcomes and risk mitigation OPUCN has confirmed would result from pursuing the modernization and NWS projects identified in the DSP as they will produce benefits for ratepayers, including long-term cost savings, environmental gains, and increased accessibility and reliability.

43. DRC acknowledges that many of the other intervenors have raised significant concerns regarding affordability, rate impacts, and the prioritization of certain capital projects. To the extent that their submissions encourage prudence, transparency, and improved planning, DRC is generally aligned with those objectives. However, DRC's support for the positions

[26] Oral Hearing, Tr. v.2, p. 4.
[27] Oral Hearing, Tr. v.2, p. 8.

of the other intervenors is conditioned on ensuring that any recommendations advanced by other parties do not result in reductions or deferrals that would compromise the:

(a) implementation of the NWS projects;

(b) grid modernization investments (e.g., metering, GIS, automation);

(c) system access investments related to DERs; or

(d) initiatives that support EV charging and electrification readiness.

44. These components of the Application and the DSP are foundational to maintaining reliability and avoiding higher long-term costs as electrification accelerates and the energy transition continues in Ontario. As noted above and confirmed at the oral hearing, underinvestment in these areas risks reactive maintenance, delayed customer upgrades, and future rate volatility.

45. Accordingly, DRC requests that the Board approve a capital funding envelope that takes into account the concerns of intervenors but remains adequate to ensure OPUCN is able to study, design, implement, and report on the NWS projects, modernization investments, DER system access investments, and initiatives that support EV charging and load growth readiness throughout the rate term.

G. CONCLUSION AND RELIEF REQUESTED

46. For the reasons above, DRC supports the DSP, as an integral response to the energy transition that also supports Ontario's efforts to decarbonize in a way that offers potential long-term affordability, reliability, and access benefits to OPUCN's customers.

47. DRC requests that any OEB approvals of the Application include the condition that OPUCN investigate and consider multi-unit residential charging, BYOC street charging, and bi-directional pilots among its priority NWS projects during the rate term.

48. DRC requests that the Board make it a condition of approval of the Application that OPUCN must report on the following information in its next Cost of Service application:

(a) **NWS Report**. An NWS report, which has been subjected to input, review and approval by relevant stakeholders, providing any relevant information and data resulting from the identification, development, and delivery of all NWS projects

considered and approved or rejected during the rate term, including the proposed projects identified in paragraph 33, so that stakeholders, including other utilities, and the Board can benefit from the lessons learned and conduct their own analysis using the data.

(b) **Publicly Available Project Results**. NWS project information and results will be publicly disclosed on OPUCN's website, subject to confidentiality claims for which OPUCN may apply to the OEB.

(c) **Performance Metrics**. NWS project results and reporting should include the following performance metrics for each NWS project to be included in OPUCN's next cost of service application, as applicable:

(i) customer cost savings impacts;

(ii) improvements to energy affordability;

(iii) reliability impacts;

(iv) accessibility impacts;

(v) GHG reduction impacts (scope 1, 2 and 3), using the GHG Protocol where applicable; and

(vi) cybersecurity impacts.

(d) DRC requests that the Board approve a capital funding envelope that takes into account the rate impact concerns of intervenors but remains adequate to ensure OPUCN is able to study, design, implement, and report on innovative NWS projects, modernization and DER system access investments, and initiatives that support EV charging and load growth readiness throughout the rate term

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS
28th day of November, 2025.

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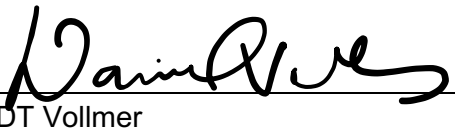

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