

Attachment 4: NWS Application Filing Checklist
GrandBridge Energy Inc. (GrandBridge Energy or GBE)
EB-2025-0265

No. of Documents	Filing Requirement Section/Page Reference	NWS Requirements	GBE NWS Application
1	<i>The Non-Wires Solutions Guidelines for Electricity Distributors (NWS Guidelines)</i> <i>EB-2024-0118, March 24, 2024</i>		
	1 Introduction		
	1.1 Purpose and Applicability		
	p. 3 & 4	Distributors filing rate applications in 2024 or 2025 are strongly encouraged to use the BCA Framework, particularly for applications requesting funding for an NWS.	s. 4.2.5 Attachment 1 Attachment 2
	p. 4	In all other respects, rate applications filed by electricity distributors are expected to be fully consistent with the NWS Guidelines, or to provide an explanation for any divergence. ⁵ The OEB will take account of the NWS Guidelines in its review of rate applications; however, the NWS Guidelines are not binding on the OEB's determination, which will also take into account the unique circumstances of a distributor's application. ⁵ Cost of service filers for 2025 rate applications have discretion in whether to align their applications with the 2021 CDM Guidelines or the new NWS Guidelines.	s1 s.2 s.5
	1.2 Provincial CDM Frameworks		
	2 Types of Distribution Rate-Funded Non-Wires Solutions		
	p.6	NWSs potentially eligible for distribution rate funding include those that reduce instantaneous electricity demand (measured in kilowatts or kilovolt-amperes) on a utility's distribution system, or a portion of that system. ⁷ ⁷ These activities may also reduce overall electricity consumption (measured in kilowatt-hours).	s. 4.2.1
	p.6	As discussed in chapter 3, distribution rate-funded NWSs are expected to address a specific system need, at the distribution level or the regional level. As system needs are often driven by peak electricity demand, it is anticipated that many NWSs may be designed to reduce peak demand. NWSs may also be geotargeted to the portion of the distribution system that is experiencing a need/constraint.	s. 3
	p. 6	NWSs may include non-distributor owned, behind-the-meter solutions, where the cost (and benefit) of the solution may be shared between the distributor and another party.	s. 4.2.1
	p. 6	In such cases, any request for funding through distribution rates must be supported by the value proposition to the distributor's customers.	s. 4.2.5 Attachment 1 Attachment 2
	p. 7	Distributors are expected to take into account the IESO's CDM programs, and ensure that any proposed distribution rate-funded NWS is not duplicative of IESO programs, in order to avoid marketplace confusion and ensure the prudent use of customer funds.	s.5.1
	p.7	Distributors are encouraged to discuss any concerns with the IESO regarding potential duplication prior to applying for distribution rate funding.	s.5.1
	3 Role of Non-Wires Solutions in Distribution System Planning		
	3.1 System Planning		
	p.8	A distributor's distribution system plan should describe how it has taken NWSs into consideration in its planning process. The degree of consideration of NWSs in meeting system needs should be proportional to the expected benefits, and will likely vary across distributors, taking into account the size and resources of a distributor. NWSs will not be a viable alternative for all types of traditional infrastructure investments. Distributors are encouraged to take account of learnings from NWSs that have been undertaken by other electricity distributors, in Ontario or elsewhere.	s.3.1 s. 3.2 s. 3.3 s. 3.4
	p.8 & 9	Distributors are required to document their consideration of NWSs when making investment decisions on electricity system needs with an expected capital cost of \$2 million or more as part of distribution system planning, excluding general plant investments. A distributor should first conduct a pre-assessment to identify whether there is a reasonable expectation that an NWS may be a viable approach to meeting an identified need.	s. 3.1 s. 4.2.1 s. 4.2.2
	p.9	Should the pre-assessment conclude that an NWS is a viable approach to meeting an identified need, a distributor should proceed with completing a BCA and documenting the results, to assess its economic feasibility, as described in the BCA Framework.	s. 4.2.5 Attachment 1 Attachment 2
	3.2 General Evidentiary Requirements for Non-Wires Solutions		

No. of Documents	Filing Requirement Section/Page Reference	NWS Requirements	GBE NWS Application
	p.10	The OEB's evaluation criteria for proposed distribution system investments that meet the defined materiality threshold for a distributor are described in Chapter 5 of the Filing Requirements, as is the supporting evidence that distributors should file for proposed projects.	s. 1.3
	p.11	A distributor should explain the proposed NWS in the context of the DSP, including providing details on the system need that is being addressed, any infrastructure investments that are being avoided or deferred as a result of the NWS, and the prioritization of the proposed NWS relative to other system investments in the DSP.	s. 3
	p.11	A distributor should provide evidence as to why the proposed NWS is the preferred approach (alone or in combination with an infrastructure solution) to meeting a system need, including an assessment of the projected benefits to customers relative to cost impacts.	s. 3.1 s. 3.2 s. 3.4 s. 4.2.1 s. 4.2.5 Attachment 1 Attachment 2
	p.11	Distributors should follow the requirements of the BCA Framework, which outlines the methodology that distributors are to employ when assessing the economic feasibility of NWSs to address defined electricity system needs, and the supporting information that should be filed related to this benefit-cost analysis (BCA).	s. 4.2.5 Attachment 1 Attachment 2
	p.11	Any proposal for a rate funded, distributor-owned NWS must demonstrate that a distributor has meaningfully explored contracting services from non-utility owned distributed energy resources (DERs) – including providing sufficient lead time for third-party DER solutions to be identified and implemented – and doing so is either not feasible or less cost-effective.	s. 4.2.1 s. 4.2.2 s. 4.2.3 s. 4.2.6 Attachment 6
	p.11 & 12	The business case for an NWS may also include consideration of costs and benefits upstream of a distributor (e.g. a distribution NWS intended to address a regional need), or realized by another party. In such cases, the OEB would expect that the proposed approach to cost-sharing between the distributor and the other party/parties would be informed by this analysis. Additional guidance regarding proposed NWSs by distributors to address regional needs is provided in chapter 4.	n/a
	3.3 Timing of NWS Applications		
	p.12	The OEB will consider applications for NWSs outside of rebasing applications, if necessary. Such an application may be required if the proposed NWS would have rate impacts prior to rebasing: . to address a system need that is currently unfunded . to address a previously identified system need and replace an infrastructure solution for which funding is built into existing rates	s. 3 s. 5.1
	p.13	The OEB will apply the principles of materiality, need, and prudence to distributor requests for funding for NWSs between rebasing applications. The details of how to apply these principles will be addressed within the context of specific applications.	s. 1 s. 3 s. 4.2.5 s. 5.2 Attachment 1 Attachment 2
	p.13 & 14	To demonstrate need, a distributor should identify the system need being addressed within the context of the distributor's distribution system plan (including a targeted update to the distribution system plan), the incrementality of costs relative to what is built into existing rates, and (for distributors using Custom IR or Price Cap IR rate-setting methodologies) an explanation of why the NWS was not included in the most recent rebasing application. ¹⁴ 14 The OEB's Advanced Capital Module report (EB-2014-0219, Report of the Board: New Policy Options for the Funding of Capital Investments: the Advanced Capital Module. September 18, 2014) establishes criteria for materiality, need, and prudence that distributors proposing amounts for recovery for capital projects by way of an ACM or an Incremental Capital Module (ICM) must meet. However, there are some key differences between ACM/ICM projects and NWSs (e.g., the likelihood that the cost recovery approach for an NWS may include both capital and OM&A costs; the lack of an ACM/ICM option for utilities using the Custom IR and Annual Index IR rate-setting methodologies).	s. 3
	3.4 Cost Recovery		

No. of Documents	Filing Requirement Section/Page Reference	NWS Requirements	GBE NWS Application
	p.14	The default treatment of costs and the approach to utility remuneration is the same for NWSs as for other distribution system expenditures. Distributors should assign costs for NWSs to capital expenditures or to operating expenses in accordance with their capitalization policy. ¹⁵ Proposed NWSs can therefore potentially include a capital expenditure component, if consistent with a distributor's capitalization policy and subject to the OEB's approval. Distributors should address any considerations regarding allocation of the cost of NWSs to customer classes, and rate design. 15 Chapter 2 of the Filing Requirements requires distributors to file their capitalization policy with the OEB as part of cost of service applications.	s. 4.2.3 s. 5.2 Attachment 3 Attachment 5
	p.15	For applications for NWS funding filed outside of rebasing, distributors should propose an approach for cost recovery (including issues of cost allocation and rate design) and identify whether any funding to address the identified system need is already included in existing rates. This will assist the OEB in determining, on a case-by-case basis, whether the proposed spending is incremental and should be eligible for cost recovery.	s. 5 Attachment 5
	p.15	Distributors proposing to use third-party DERs as NWSs are also eligible, under the OEB's Framework for Energy Innovation, to apply for an incentive mechanism. This may require establishing a deferral account to record amounts to fund earned incentives, to be reviewed and disposed of at a later date. Distributors applying for an incentive mechanism related to their use of an NWS should follow the OEB's filing guidance for incentive proposals.	s. 4.2.4 s. 5.2
	4 Distributor Non-Wires Solutions to Meet Regional Needs 4.3 Cost Responsibility for Non-Wires Solutions Addressing Regional Needs		
	p.18	Prior to applying for distribution rate funding under the NWS Guidelines, a distributor should confirm whether funding (in part or in full) is available through the Local Initiatives Program or another IESO program.	s. 5.1
2	<i>Benefit-Cost Analysis Framework for Addressing Electricity System Needs, May 16, 2024</i>		
	2. PURPOSE AND USE		
	2.2. Criteria for Use	A distributor should first conduct a pre-assessment to identify whether there is a reasonable expectation that an NWS may be a viable approach to meeting an identified need. The OEB expects that the appropriateness of deploying an NWS will depend on the system need, as some system needs may be clearly unsuitable for NWS.	s. 3 s. 4.2.1
	2.4. Regulatory Submissions	For system needs where an electricity distributor has identified an NWS as a viable option, the electricity distributor is expected to complete a BCA. Electricity distributors may include the BCA as an independent document within its filing or as part of the project business case filed with the OEB. Templates for documenting the results of a benefit-cost analysis are included as part of the BCA Framework. Templates are provided as live Microsoft Excel-based spreadsheets for use by electricity distributors. These templates are to be completed and filed with the OEB for any proposed NWS. The templates are the minimum informational filings when applying for ratepayer funding from the OEB. Electricity distributors may file any supplemental information that may help support their funding request with the OEB.	s. 4.2.5 Attachment 1 Attachment 2 s. 4.2.5 Attachment 1 Attachment 2 File Name: GBE_NWS_2026_Att2_BCA_Model_2025 1121.xls
	3. General Methodological Considerations		
		The BCA's concluding outcome is informed by two sets of outputs: (i) the cost-effectiveness test (or tests) which provides a quantitative assessment of the proposed NWS net benefits to customers, and (ii) the qualitative BCA considerations.	s. 4.2.5 Attachment 1 Attachment 2 File Name: GBE_NWS_2026_Att2_BCA_Model_2025 1121.xls
		For system needs that proceed to a BCA, electricity distributors are to complete the mandatory DST and include consideration of relevant distribution-related qualitative impacts.	s. 4.2.5 Attachment 1 Attachment 2 File Name: GBE_NWS_2026_Att2_BCA_Model_2025 1121.xls
	6. Filing Requirements		
	p. 40	As per the NWS Guidelines, electricity distributors should explain the proposed NWS in the context of their DSP, including providing details on the system need that is being addressed, the infrastructure investments that are being avoided or deferred because of the NWS, and the prioritization of the proposed NWS relative to other system investments in the DSP.	s. 3 s. 4.2.1

No. of Documents	Filing Requirement Section/Page Reference	NWS Requirements	GBE NWS Application
	6.1. Filing Format / Template	<p>Electricity distributors are to submit filings on their proposed NWS using a similar format to that used by the distributor for justifying capital expenditures within the DSP. In all cases where a BCA was conducted (regardless of whether an NWS was ultimately selected), the following are to be specified:</p> <ul style="list-style-type: none"> . Need. A narrative description of system needs and the associated context. This should specify whether the need is discretionary or non-discretionary, the timing of the need, the main driver of the need, and any uncertainties. . Alternatives Considered. Specification of the reference scenario and the alternatives under consideration. The reference scenario for non-discretionary needs will typically be the traditional poles-and-wires solution as this is what would be deployed under business-as-usual practices to ensure the reliability and continuity of customers' distribution service. The reference scenario for discretionary needs may be that no action is undertaken. . Alternatives Considered. Specification of the reference scenario and the alternatives under consideration. The reference scenario for non-discretionary needs will typically be the traditional poles-and-wires solution as this is what would be deployed under business-as-usual practices to ensure the reliability and continuity of customers' distribution service. The reference scenario for discretionary needs may be that no action is undertaken. . Cost-Effectiveness Test. This section should include a summary of the sources and methods used to estimate the quantitative benefits and costs included in the test(s), as well as a summary table of the impacts themselves and a discussion of any key areas of uncertainty related to these values. Other BCA Considerations. A summary of the qualitative considerations or any additional supporting evidence for the preferred alternative. . Risk Mitigation. Identification of monitoring, mitigation, and management strategies to address risks identified as BCA considerations. • Outcome. A short, formal, confirmation of the alternative selected, and the essential specifications of that alternative. 	<p>s. 3 s. 4.2.1 s. 4.2.5 Attachment 1 Attachment 2 File Name: GBE_NWS_2026_Att2_BCA_Model_2025 1121.xls</p>
	p. 40 & 41		
	6.2. Data Output Requirements	<p>The BCA Framework is accompanied by an Excel-based quantitative output template. The use of this template is mandatory and is the minimum filing requirement of the BCA Framework. Electricity distributors may supplement the template with additional documentation, as they deem necessary.</p> <p>The output template requires the electricity distributor to provide both the net present value of each impact considered in the BCA as well as the upstream quantifiable outcome driving that impact, where relevant.</p>	<p>File Name: GBE_NWS_2026_Att2_BCA_Model_2025 1121.xls File Name: GBE_NWS_2026_Att2_BCA_Model_2025 1121.xls</p>
	p.41		
	p.41		
3	<p><i>Filing Requirements for Electricity Distribution Rate Applications - 2025 Edition for 2026 Rate Applications, Chapter 2, December 9, 2024 Corrected: May 7, 2025</i></p>	<p>The distributor must provide justification for material amounts and material annual variances described in its application.</p> <p>The materiality thresholds differ depending on the magnitude of a distributor's revenue requirement. The distributor-specific thresholds are as follows:</p> <ul style="list-style-type: none"> o \$50,000 for a distributor with a distribution base revenue requirement less than or equal to \$10 million. o 0.5% of distribution base revenue requirement for a distributor with a distribution base revenue requirement greater than \$10 million and less than or equal to \$200 million. o \$1 million for a distributor with a distribution base revenue requirement of more than \$200 million <p>An explanation and/or supporting evidence (e.g., calculations, supporting rationale, etc.) is required for amounts exceeding the materiality threshold, and the threshold should be applied in the following ways (see table is col D): A distributor may provide additional details for items below the threshold if it determines that this may be helpful to the OEB</p>	<p>s. 1 s. 5.2</p>
	p.6, 2.08 Materiality Thresholds		

No. of Documents	Filing Requirement Section/Page Reference	NWS Requirements	GBE NWS Application
4	<p>Filing Requirements For Electricity Distribution Rate Applications - 2025 Edition for 2026 Rate Applications, Chapter 5, Distribution System Plan, December 9, 2024</p>		
	5.3.5 Non-Wires Solutions to Address System Needs		
	p. 12	<p>The NWS Guidelines require distributors to incorporate consideration of NWSs into their distribution system planning process by considering whether a distribution rate-funded NWS may be a preferred approach to meeting a system need, thus avoiding or deferring spending on traditional infrastructure. NWSs potentially eligible for distribution rate funding are not limited to energy efficiency programs and include activities that reduce instantaneous electricity demand, including demand response and energy storage.¹⁸ ¹⁸ More examples are provided in the NWS Guidelines Section 2</p>	s. 3 s. 4
	p. 12	<p>Distributors may apply to the OEB for funding through distribution rates for NWSs as specified in the NWS Guidelines. Distributors must explain the proposed activity in the context of the distributor's DSP, including providing details on the system need that is being addressed, any infrastructure investments that are being avoided or deferred as a result of the NWS (this could include investments upstream of a distributor), and the prioritization of the proposed NWS relative to other system investments in the DSP.</p>	s. 3 s. 4.2.1 Attachment 1
	P. 12 & 13	<p>A distributor should provide evidence as to why the proposed NWS is the preferred approach (alone or in combination with an infrastructure solution) to meeting a system need, including an assessment of the projected benefits to customers relative to cost impacts, following the requirements of the BCA Framework. Any proposal for a rate funded, distributor-owned NWS must demonstrate that a distributor has meaningfully explored contracting services from non-utility owned distributed energy resources – including providing sufficient lead time for third-party solutions to be identified and implemented – and doing so is either not feasible or less cost-effective.</p>	s. 3 s. 4.2.1 s. 4.2.5 Attachment 1 Attachment 2
	<p>5.4 Capital Expenditure Plan 5.4.2.1 Material Investments</p>		
	p. 15	<p>The focus of this section is on projects/programs that meet the materiality threshold set out in Chapter 2 of the Filing Requirements for Electricity Distribution Rate Applications. However, distributors are encouraged in all instances to consider the applicability of these requirements to ensure that all investments proposed for recovery in rates, including those deemed by the applicant to be distinct for any other reason (e.g., unique characteristics; marked divergence from previous trend) are supported by evidence that enables the OEB's assessment according to the evaluation criteria set out below. The level of detail filed by a distributor to support a given investment project/program should be proportional to the materiality of the investment. The guidelines on the information to be provided for any material investment are described in the following sections.</p>	S. 1.3 s. 4.2.3 s. 5.2
	A. General Information on the project/program		
	p. 15	<p>A distributor is expected to provide information about the investment, which includes the need, scope, volume of work expected to be completed, key project timings (including key factors that affect timing); total expenditures (including capital contributions and the economic evaluation as per section 3.2 of the Distribution System Code, as applicable); comparative historical expenditures; investment priority; alternatives considered; and the benefit-cost analysis (BCA) of the recommended alternative. A description of the innovative nature of the investment, if applicable, should also be included.</p>	s. 3 s. 4 Attachment 1 Attachment 2 Attachment 3
	B. Evaluation criteria and information requirements for each project/program		
	p. 15	<p>A distributor should demonstrate the need for the investment, which generally should be related to a distributor's asset management process. There could also be instances where the need is to address safety, cyber security, grid innovation, environmental, statutory obligations, or regulatory obligations. A distributor should provide adequate support in justifying the investments that are not outputs of the asset management process.</p>	s. 3
	p. 16	<p>Justifying an investment can be demonstrated through evidence of accepted distributor practices or through a BCA of alternatives as detailed below.</p>	s. 4.2.1 s. 4.2.2 s. 4.2.5 Attachment 1 Attachment 2

No. of
Documents

Filing Requirement Section/Page Reference

NWS Requirements

GBE NWS Application

p. 16

Consistent with the OEB's objective of facilitating innovation in the electricity sector, innovative projects and programs may receive special consideration. As such, the distributor should fully explain how the innovative project is expected to benefit its customers, such as improved reliability; enhanced customer services; efficient use of electricity; load management; greater efficiency through grid optimization; lower rates (long-term or short-term); enhanced customer choice (including enabling adoption by consumers of distributed energy resources); or any other benefit consistent with the OEB's mandate and policies.

s. 4
Attachment 1
Attachment 2

No. of Documents	Filing Requirement Section/Page Reference	NWS Requirements	GBE NWS Application
	5.4.2.2 Benefit-Cost Analysis Framework p. 16 p. 17	The BCA Framework is mandatory when the projected capital cost of the proposed solution to an electricity system need (either NWS or traditional infrastructure) exceeds \$2 million (excluding general plant investments). For proposed investments with projected capital costs of less than \$2 million, distributors may use existing, alternative cost-effectiveness or decision-making protocols, or the BCA Framework at their discretion.	s. 4.2.5 Attachment 1 Attachment 2
5	<i>Filing Guidelines for Incentives for Electricity Distributors to Use Third-Party DERs as Non-Wires Alternatives, March 28, 2023</i>		
	1. Background p. 2	As set out in the FEI Report, distributors may choose one of the following three incentive mechanisms and may file proposals as part of a rebasing application or as a stand-alone application: Shared Savings Mechanism, Performance Target or Scorecard-Based Incentive, and Margin on Payments.	s. 4.2.4
	2. General Information for Incentive Applications p. 3	Any application for a DER incentive mechanism, regardless of which mechanism is proposed, should discuss the specific OEB approvals sought, the market-based DER solutions the applicant intends to deploy, and the details of the proposed incentive mechanism.	s. 4.2.1 s. 4.2.4
	2.1 Approvals & Rate Funding Sought	If an incentive proposal is filed as a stand-alone application, the applicant should discuss if rate funding for the planned non-wires alternatives has been obtained through another application or whether the non-wires alternatives are displacing previously planned capital projects (i.e., wires solutions) and will be funded through budget reallocations within the applicant's current rate envelope.	N/A
		If incremental rate funding for market-based non-wires alternatives is being sought, along with the approval of the incentive mechanism, the application should follow the approach contemplated in the CDM Guidelines. To support requests for rate funding, the applicant should provide evidence of materiality, need, and prudence. Discussion of the need and options considered should be consistent with section [5.4.1.2] of the Chapter 5 Filing Requirements for Electricity Distributor Rate Applications. Consistent with the CDM Guidelines, applications filed outside of rebasing should "propose an approach for cost recovery (including issues of cost allocation and rate design) and identify whether any funding to address the identified system need is already included in existing rates. This will assist the OEB in determining, on a case-by-case basis, whether the proposed spending is incremental and should be eligible for cost recovery."	s. 3 s. 4 s. 5 Attachment 1 Attachment 2
	2.2 Description of Market-Based DER Activities (Non-Wires Alternatives)		
	p. 4	To provide context for consideration and approval of an incentive mechanism, the application must describe the procurement programs or other means that the distributor intends to use to obtain services from third-party owned DERs. This must include information about: <ul style="list-style-type: none"> •the system needs being addressed; •the wires solutions being deferred or displaced; and •the corresponding benefits to customers. When an incentive proposal is filed as part of a rebasing application, this context may be provided by way of references to the parts of the application discussing the relevant DER activities. 	s. 3 s. 4 Attachment 1 Attachment 2 Attachment 6
	2.3 Proposed Incentive Mechanism p. 4	The application must describe the proposed incentive mechanism in detail, as well as discuss why the approach was selected out of the three available incentive options. The description of the proposed incentive mechanism must	s. 4.2.4
	2.3.1 Incentive Amount p. 4	The application should forecast the total amount of the proposed incentive the distributor may earn. The amount should be presented as a total for the term of the incentive, as well as broken down on an annualized basis, where applicable.	s. 4.2.4
	2.3.2 Methodologies p. 5	Applicants must provide the proposed methodology, including underlying inputs and assumptions, for calculating the incentive. The proposed methodology for measuring performance and the achievement of targets, as applicable, depending on the mechanism proposed, should also be provided.	s. 4.2.4
	2.3.3 Incentive Term		

No. of Documents	Filing Requirement Section/Page Reference	NWS Requirements	GBE NWS Application
	p. 5	Applicants must propose an effective date and duration for the incentive mechanism. When an incentive proposal is filed as a stand-alone application, the term of the incentive is generally expected to be the remainder of the current rate term (from the effective date sought in the application), unless a different term is specifically approved.	s. 4.2.4 s. 5.2
	2.4 Incentive Implementation		
	p. 5	Applicants must discuss the proposed approach to implementing and awarding the incentive.	s. 4.2.4
	p. 5	As discussed in section 1.1, this will usually involve establishing a deferral account to record incentive amounts that may be earned, and obtaining separate OEB approval to award the incentive and dispose of the amounts in the account, once the incentive term has ended. <ul style="list-style-type: none"> •The applicant should file a draft accounting order along with a description of the proposed account. •The application should also discuss the mechanics of the proposed account and the anticipated timing of the disposition request. •When an incentive term ends at the same time as the rate-term, it is generally expected that an OEB decision on whether to award the incentive, and to dispose the deferral account balance would occur in the subsequent rebasing application. •If a different incentive term is sought, the applicant should identify when and how it will seek OEB approval to award the incentive and dispose the deferral account balance. Applicants may propose to add a margin on payments to DERs owned by customers or third-parties for providing services (e.g., capacity, reliability, etc.) to the distribution system as part of a non-wires solution. To fulfill the information requirements established in section 1.4 applicants must: <ul style="list-style-type: none"> •Identify and provide a rationale for the margin on payments to DERs for services to the distribution system to be retained by the distributor. This should include an estimate of the total dollar value generated by that margin during the proposed incentive term and on an annualized basis. •Provide a forecast of payments for DER services to the distribution system for the proposed incentive term, including details about underlying assumptions and inputs to allow assessment of the reasonableness of the forecast. Distributors should also plan to provide evidence in their next rebasing applications about the progress or results of implemented incentive mechanisms. For further clarity, the OEB does not generally expect information or updates about incentive mechanisms to be filed with IRM applications or Custom IR annual updates, unless such a requirement is established in the OEB's approval of the incentive mechanism.	s. 5.2 Attachment 5
6	<i>Distribution System Code</i>	Section 11, Margin On Payments Incentive Mechanism	s. 4.2.4