



January 22, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Mr. Murray,

RE: EB-2025-0252 Alectra Utilities Application for electricity distribution rates and other charges beginning January 1, 2027 - CCMBC Interrogatories

Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC) compliments Alectra Utilities on its thorough and well written evidence. In accordance with the instructions in PO No.1 CCMBC has ensured that its interrogatories do not duplicate any interrogatories of Energy Probe and that there is no double billing. CCMBC has reviewed the interrogatories of AMPCO, CCC and SEC. As a result, and to avoid duplication of areas covered by the interrogatories of other parties, CCMBC has only a few interrogatories.

Respectfully submitted on behalf of CCMBC,

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Catherine Swift (CCMBC)
Parties to the Proceeding

**EB-2025-0252 Alectra Utilities Limited 2027 Rebasing
CCMBC Interrogatories
January 22, 2026**

1-CCMBC-1

Reference: Exhibit 1, Tab 6, Schedule 2, Attachment 1-3, Clearspring Report, Page 16, Table 2 Total Cost Benchmarking Sample

Question: Of the utilities listed in Table 2, which ones are municipally owned electricity distributors with no generation, transmission or natural gas business?

1-CCMBC-2

Reference: Exhibit 1, Tab 8, Schedule 4, Attachment 1-11, Fitch Credit Rating Report, page 11, Simplified Group Structure Diagram Organizational Structure—ALECTRA Inc.

Questions:

- a) Of the affiliates of Alectra Utilities Limited (AUL) shown in the exhibit please indicate which affiliates have employees without disclosing the number if it is confidential.
- b) For each affiliate list the services provided to it by AUL, and the services provided by it to AUL.
- c) Do Ring-Fenced Solar Partnership and Solar Sunbelt General Partnership generate electricity and export it into the AUL distribution system? Please explain if this electricity is net metered and any other related business arrangement.

4-CCMBC-3

Reference: Exhibit 4, Tab 1, Schedule 1, Page 3 and Exhibit 4, Tab 1, Schedule 2, page 3

Preamble: “Alectra Utilities has emerged from the historical period having integrated five utilities and navigated significant economic challenges while prudently managing costs. However, with the expected growth in electricity demand and aging infrastructure, additional OM&A investments are now needed to sustain service levels and maintain reliability.

Questions:

- a) Please explain the apparent contradiction between the claim of “prudently managing costs” and the claim of “increasing backlog of deteriorated assets” in Schedule 2, page 3.

- b) Did Alectra's management intentionally defer maintenance or was the deferral unintentional?

4-CCMBC-4

Reference: Exhibit 4, Tab 1, Schedule 2, Page 2, Table 4-1-3: OM&A (\$) per Customer

Question: Please explain why the forecast of OM&A Per Customer CAGR (\$) for the 2025 – 2031 period is 4.1% when it was only 1.4% for the 2019 – 2024 period.

4-CCMBC-5

Reference: Exhibit 4, Tab 1, Schedule 2, page 3

Preamble: "Alectra Utilities is managing an increasing backlog of deteriorated assets, which has increased by 49% from the 2018 Asset Condition Assessment results. This trend underscores the necessity of prioritizing maintenance programs and related activities to maintain system reliability. An example of this is the pole replacement program, which is planned to increase from 746 poles in 2025 to 1,300 poles in 2031."

Questions:

- a) Please explain why the increasing backlog of deteriorating assets would not be an indication of mismanagement of maintenance since 2018.
- b) Please explain why maintenance programs were not prioritized since 2018.
- c) Please confirm that pole replacement is a capital program.
- d) Will the increase in pole replacement result in a reduction in OM&A?

9-CCMBC-6

Reference: Exhibit 9, Tab 1, Schedule 1, page 3, Table 9-1-2, Alectra Utilities' Group 2 DVA Balances (\$MM).

Question: Please reconcile the balances shown for Account 1508 – Incremental Capital Module shown in Table 9-1-2 with the ICM Approved balances shown in Exhibit 2B, Tab 1, Schedule 1, page 5, Table 2-1-3: 2017-2024 OEB Approved Fixed Assets Summary (in \$MM).