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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 - Energy Probe Interrogatories

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to Alectra Utilities. Energy Probe has reviewed the interrogatories of AMPCO, CCC and SEC and to avoid duplication has reduced the number of its interrogatories. In accordance with the instructions in PO No.1 Energy Probe has ensured that its interrogatories do not duplicate any interrogatories of CCMBC and that there is no double billing.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe)
Parties to the Proceeding

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EB-2025-0252 Alectra Utilities Limited 2027 Rebasing
Energy Probe Interrogatories
January 22, 2026

1-EP-1

Reference: Exhibit 1, Tab 11, Schedule 2, Page 4

Preamble: Alectra Utilities is proposing a Custom IR framework to meet funding needs arising from evolving cost pressures and investments required; needs that cannot be accommodated within the parameters of the OEB's Price Cap Incentive Rate-setting (Price Cap IR) model.

Question: Considering that most of the 57 Ontario electricity distributors can accommodate their funding needs within the OEB's Price Cap Incentive Rate-setting model, and that Alectra has successfully used that model in the past, why does Alectra now believe that it can no longer use that model.

1-EP-2

Reference: Exhibit 1, Tab 11, Schedule 2, Page 4, Chart 1-11-1: Custom Price Cap Revenue vs. Price Cap (IRM) Revenue

Questions:

- a) Please file a table showing all calculations used in preparing this chart.
- b) Please list all assumptions used in preparing this chart.
- c) Did Alectra take into consideration that it would be eligible for ACM/ICM under Price Cap but not under Custom Price Cap.

1-EP-3

Reference: Exhibit 1, Tab 7, Schedule 1, page 1

Preamble: Through its Green Energy & Technology (GRE&T) Centre, Alectra Utilities partners closely with government agencies, industry partners, and other utilities to explore and implement new ideas and emerging technologies that can enhance how Alectra Utilities serves its customers.

Questions:

- a) Please file the 2026 Test Year itemized budget for the GRE&T Centre, including both capital and OM&A.
- b) What is the number of Test Year FTEs in the GRE&T Centre?
- c) What green energies are within the scope of the GRE&T Centre?

1-EP-4

Exhibit 1, Tab 7, Schedule 1, page 3

Preamble: “By conducting pilot projects, technology demonstrations, and field assessments, the Centre gathers practical insights that support informed investment decisions.”

Questions:

- a) Please list the pilot projects, their costs and achieved results that GRE&T Centre was involved in during the Bridge Year.

- b) Please list the pilot projects, their costs and expected results that GRE&T Centre will be involved in during the Test Year.

2-EP-5

Reference: Exhibit 2B, Tab 1, Schedule 2, Page 3, Table 2-1-7: Comparing capital expenditures to in-service additions (2025-2031) (\$MM)

Question: Please explain the reason for the increase in System Service capital expenditures from \$79.6 million in 2028 to \$150.0 million in 2029.

2A-EP-6

Reference: Exhibit 2A, Tab 1, Schedule 1, 5.3.2 Overview of Assets Managed, Page 142

Preamble: “One contributor to growth is the projected increased load pertaining to data centres in the Alectra Utilities service area. Load from data centres is approximately 115MW and Alectra Utilities has received applications and customer commitments to connect an additional 425MW of data centre load over the 2025-2031 period.”

Questions:

- a) Does Alectra have sufficient available capacity on its distribution system to connect and serve these data centres? If the answer is no, will Alectra need to expand its system to serve them, and will the data centres be required to pay a contribution if the revenues from them are inadequate?

- b) Please provide a link to the OEB’s Capacity Information Map for Alectra.

2A-EP-7

Reference: Exhibit 2A, Tab 1, Schedule 1, 5.3.5 Non-Wires Solutions to Address System Needs, Page 338

Preamble: “Alectra Utilities plans to implement an NWS Program during the 2027-2031 period to procure, third-party DER capacity and energy in the five affected pockets: Nebo TS, Newton

TS, Melbourne MS, Alliston MS, and Barrie MS. This NWS Program will provide locational capacity, relief and thereby defer or right-size otherwise necessary station investments.”

Questions:

- a) Please list the types of third-party DERs that Alectra is referring to and their expected annual load factors.
- b) What is Alectra’s plan if there is inadequate third-party DER capacity available?
- c) What is Alectra’s plan if there is adequate third-party DER capacity, but its cost is much higher than expected.

2A-EP-8

Reference: Exhibit 2A Tab 1 Schedule 1 Appendix B09 – Information Technology Systems Page 351

Preamble: Alectra Utilities expects work volumes to rise as it reinforces, expands, and modernizes its grid to address customer growth, increasing extreme weather challenges, increased DER access, and electrification growth within its service territories.

Questions:

- a) Please explain the reasons for the increase in work volumes caused by increased DER access.
- b) Is the increase in work volumes different for exporting and non-exporting DERs?
- c) How many customers currently own DERs in the territory served by Alectra and how many are expected to own DERs by the end of 2031?
- d) Are customers that own DERs charged for the increased work volumes caused by them?

2A-EP-9

Reference: Exhibit 2A Tab 1 Schedule 1 Appendix B09 – Information Technology Systems Page 364

Questions:

- a) Please explain how school bus fleets use DERs
- b) Are school bus fleet owners charged for the incremental cost of DERs serving them?

2A-EP-10

Reference: Exhibit 2A Tab 1 Schedule 1 Appendix B09 – Information Technology Systems Page 365

Preamble: “Customer-sited DERs offer valuable flexibility and capacity for the distribution system. Efficient use of DERs enables load curtailment and shifting to off-peak periods, helping manage and defer 4 load growth within current limits until upgrades are made.”

Questions:

- a) What types of DERs are described in the quoted sentences?
- b) Do all types of DERs offer the same amount of valuable flexibility and capacity? Please explain your answer.

3-EP-11

Reference: Exhibit 3, Tab 1, Schedule 1, Page 3 and Exhibit 2A, Tab 1, Schedule 1, 5.3.2 Overview of Assets Managed, Page 142

Preamble: “The second layer of Alectra Utilities' customer and load forecast accounts for anticipated impacts from EV adoption and building electrification. This component of the forecast reflects expected changes in electricity demand arising from the transition of buildings to electric end-uses and the increasing penetration of EVs. Additionally, building electrification is projected to be another contributing driver of load growth. To capture the associated impact, Alectra Utilities' System Planning Team developed Low, Medium, and High electrification uptake scenarios while Itron's forecast incorporates the Medium uptake scenario.”

Questions:

- a) Please list the assumptions regarding electrification, separating the impact of EVs from building electrification.
- b) What forecast period assumptions did Alectra make regarding the increases in the total cost of heating with natural gas and the increases in the total cost of heating with electricity assuming the same level of building insulation.
- c) There is no mention of loads from data centres. Are loads from any data centers included in the forecast?