PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

January 22, 2026 **VIA E-MAIL**

Ritchie Murray
Acting Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Mr. Murray:

Re: EB-2025-0252 Alectra Utilities Corporation
Application for January 1, 2027 Distribution Rates
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

Please find attached the revised interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Mark C. Garner
Digitally signed by Mark C. Garner
Date: 2026.01.22 16:40:37 -05'00'

Mark Garner
Consultants for VECC/PIAC

Natalie Yeates, AUC
natalie.yeates@alectrautilities.com

Charles Keizer, Torys LLP, Counsel to AUC
ckeizer@torys.com

REQUESTOR NAME	**VECC**
TO:	**Alectra Utilities Corporation (Alectra or AUC)**
DATE:	**January 22, 2026**
CASE NO:	**EB-2025-0252**
APPLICATION NAME	**2027-2031 Custom Rate Application**

1.0 ADMINISTRATION (EXHIBIT 1)

1.0-VECC-1

Reference: Exhibit 1, Tab 3, Schedule 1, pages 18-19

"Climate projections show that the majority of Alectra Utilities' service territory will experience more damaging high wind events that will increase in severity and intensity"

Table 4-2-112: Alectra Utilities Major Event Days 2017-2024

Year	2017	2018	2019	2020	2021	2022	2023	2024
Number of Major Event Days	4	5	1	2	1	4	0	2
Customer Hours of Interruption	235,795	768,480	264,180	225,523	153,943	1,835,821	0	96,167

a) Figure 1-3-3 appears to show Alectra located in upstate New York with respect to derecho occurrence. Please explain.

b) How does Alectra define a "derecho". Does such an event constitute a "major event day" occurrence?

c) Please explain what "system hardening" is able to withstand the "derecho" definition used in response to (b).

d) Table 4-2-112 appears to show a trend for declining number of major event days over the 2017 to 2024 period. How does a single large storm show a trend to more severe weather that can affect distribution plant.?

e) How many Major Event Days were experienced in 2025?

1.0-VECC-2

Reference: Exhibit 1, Tab 11, Schedule 2

a) Please provide a table showing the Canadian annualized CPI for the years 2016 to 2025.

1.0-VECC-3

Reference: Exhibit 1, Tab 3, Schedule 1, page 30

2027 – 2031
Custom Performance Scorecard

Reporting Category	Performance Measures	Target by 2031
Reliability*	SAIDI	0.74 hours
	Failed Equipment - CHI	354,481 hours
Cost Control	Planned Capital - Actual vs. Planned	100% (+/-5%)
	Fleet Availability	>90% (yearly)
Infrastructure Asset Renewal	Assets replaced	Poles: 5,256
		Transformers: 4,771
		Switch: 255
		Switchgear: 344
		Cable: 381 KM
	AMI 2.0 Meters installed	950,000
Automation	Automated Devices added to the distribution system	2027: 100
		2028: 100
		2029: 110
		2030: 110
		2031: 110
Meeting Capacity Needs	Added Station Capacity	685 MVA

*excluding Major Event Days

a) Please explain why Alectra chose not to include any reliability measures related to defective equipment outages in its custom performance scorecard.

b) Please explain the relationship, if any, between scorecard performance and the rate adjustment mechanism proposed by Alectra. If there is no relationship please explain how the scorecard otherwise provides incentives to Alectra shareholders or its employees.

1.0-VECC-4

Reference: Exhibit 1, Tab 5, Schedule 1, page 3

"*Customers can monitor fluctuations in electricity usage and their financial impact on a daily, monthly, and yearly basis*."

a) With respect to investments made as part of Alectra's Digital-First Strategy what post project monitoring is done to understand the extent to which customers actually take advantage of new (or existing) functions of the digital customer interface? That is, how does Alectra assess whether new digital functionalities are worth their investment cost?

1.0-VECC-5

Reference: Exhibit 1, Tab 5, Schedule 1, pages 7

"*Alectra Utilities will also invest in a new Dynamic Bill Redesign, planned for 2029. Alectra Utilities' transactional data shows that while e-bill adoption has grown significantly, it remains low among long-standing accounts, at approximately 20% (compared to 60% among new account holders). Alectra Utilities' existing paper bill design is static and cannot easily support changes to its layout*."

a) Does Alectra currently have a mock-up of its new bill design? If so please provide a new bill example.
b) Please describe the nature of the customer engagement/feedback that is being employed in developing a new bill design.
c) What, if any, approval does Alectra expect to receive from the Ontario Energy Board with respect to its new bill design.
d) Please confirm (or correct) that it is not Alectra's intention to eliminate or charge separately for paper bill service.

1.0-VECC-6

Reference: Exhibit 1, Tab 5, Schedule 1, pages 18

"*This trend is supported by Alectra Utilities' J.D. Power survey insights, which show that EV owners are significantly more likely to engage with their utility, nearly doubling both digital interactions (66% vs. 34% for non-EV owners) and Call Centre interactions (21% vs. 12% non-EV owners). These interactions are often more complex, requiring additional time to fully address customer needs. J.D. Power survey insights forecasts an EV market potential of 50% across Alectra Utilities' service area (2025 Mid-year survey results), including 8% current ownership, 10% short-term intent (Definitely will purchase/lease), and 32% long-term intent (Probably will purchase/lease*)."

a) We are unable to locate the referred to study in evidence. Has Alectra included the referenced J.D.Power survey as evidence in this proceeding?
b) Statistics Canada publishes "New motor vehicle registrations, quarterly.." (https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=2010002501). Please provide a table showing for the period 2020 to the latest quarter published (currently Q3 2025) showing All fuel types, and all zero-emission vehicles (Battery electric and Plug-in hybrid).

c) Please provide the dates for the ending of any federal or provincial subsidies for purchasing zero-emission vehicles in 2024, 2025, or 2026.

1.0-VECC-7

Reference: Exhibit 1, Tab 5,

a) Please list and provide (individually) the costs of all third party customer engagement surveys completed since the last cost of service application including Innovative Research referenced in this proceeding.

1.0-VECC-8

Reference: Exhibit 1, Tab 8, Schedule 2, Alectra_Attach 1-8_2024…XLSX Reconciliation between Audited

a) Operating expenses for 2024 are listed as $314M in the Financial Statements and as $292M in Table 1-3-11 (E1/T3/S2/p16). The reconciliation Excel spreadsheet shows the expense to be reconciled as $286M (line 15). Please explain the difference.
b) Note 5 of the reconciliation model explains $24.70 of this difference as "Regulatory adjustment". Are these adjustments related solely to the conversion to IFRS? If not please explain what this adjustment pertains too.

1.0-VECC-9

Reference: Exhibit 1, Tab 11, Schedule 2, page 14

a) With respect to Table 1-11-4, please explain how the Billing Determinant Growth Back-off percentages for each year were determined.

2.0 RATE BASE AND CAPITAL (EXHIBIT 2)

2.0-VECC -10

Reference: Exhibit 2, Tab 5,

a) Were the poles replaced of a standard to withstand EF2 (Derecho) winds?

b) What is the premium per pole (or other transmission asset technology) that provides a guarantee of an asset not failing when confronted with 217km winds?

c) What analysis has Alectra undertaken of the cost-benefit efficacy of investments into more resilient (and expensive) assets as compared to a better, more effective and quicker post storm restoration plan?

2.0-VECC -11

Reference: Exhibit 2A, Tab 1, Schedule 1, page 91 and 140

Preamble: The Application states:

"*Alectra Utilities has developed its system peak demand load forecast utilizing an end-use analysis methodology. This methodology incorporates historical system data, economic growth indicators (population, housing, employment) for each of the six Alectra planning zones (York, Simcoe, Central North - Brampton, Central South - Mississauga, West and Southwest) and identified emerging demand drivers (e.g. Artificial Intelligence - Data Centre expansion, transportation electrification).*" (page 91)

a) Please confirm that the population and household growth forecasts used were those set out at page 140. If not please provide the forecasts used for the 2026-2031 period.

b) Please provide the employment forecasts used for each of the six planning zones (2024-2031).

2.0-VECC -12

Reference: Exhibit 2A, Tab 1, Schedule 1, pages 91 and 143
Exhibit 2A, Tab 1, Schedule 1, Appendix B-10, pages 395-400 and 402
Exhibit 2A, Tab 1, Schedule 1, Appendix J, page 23

Preamble: The Application states:

A. "*Investments in Residential and Small Commercial Layouts consist of work to make the system ready for new residential infill services and upgrading residential and small commercial services.*" (page 395)

B. *"Forecasts for residential and small commercial layouts are based on historical volumes and pricing information as well as growth in residential EV charging*." (page 395)

C. *"New ICI Services consist of new or upgraded primary services to industrial, commercial and 9 institutional customers (such as medical buildings, small plazas or factories)."* (page 396)

D. *"Forecasts for New ICI Services were developed the same way as Layouts, including an allowance for EV charging growth".* (page 396)

E. *"Investments in New Subdivisions are the capital expenditures Alectra Utilities incurs to serve development projects, including residential and condominium-tower subdivisions, new industrial, commercial and institutional (ICI) subdivisions, and relocation work directly attributable to those developments*." (page 396)

F. *"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."* (page 143)

G. *"A large data centre compound has been developed in the Leslie St/Elgin Mills Rd area in the Town of Richmond Hill since 2016 and six buildings (DC1 to DC6) have been proposed. Three buildings have been built and one is under construction. Two more buildings are to be built in the next 5 years. The total data centre capacity requested in this area is 176MW*." (Appendix J, page 23)

a) With respect to Preamble Items (B) and (D), what are the assumptions used regarding the growth in EV charging and how does this growth impact the forecasts for Residential and Small Commercial Layouts and New ICI Services?

b) With respect to Table B10-3, please revise the table so as to include additional columns setting out: i) whether the connection involved is with respect to an existing or new customer, ii) the year the connection is expected to be completed, iii) the additional load (MW) anticipated (if any) when the connection is first completed, iv) what the full incremental load will be (if different from that in (iii) and iv) the year the full load is expected to be realized (if different from (ii)).

c) With respect to Table B10-6, for those rows related to load customer connections (i.e., the first four), where applicable please provide a breakdown as between: i) new connections and ii) upgrades of existing connections.

d) With respect to TableB10-6, for each year how many of the Condo Buildings have/will have individually metered units (as opposed to being a single load customer). For those Condo's that are/will be individually metered how individually metered units will they have on average?

e) Does Table B10-3 include the new data centres discussed in Preamble Items (F) and (G)?

2.0-VECC -13

Reference: Exhibit 2A, Tab 1, Schedule 1, DSP Appendix J, pages (i) to (ii), 30, 36, 37, 40 and 44

Preamble: The Application states:

A. "*This analysis considers historical system loading, regional population and employment growth, weather correction, Conservation Demand Management (CDM), including energy efficiency, Distributed Energy Resources (DER) impacts, Global Adjustment (GA) Impact, transportation and building heating electrification." (page (i))*

B. "The key drivers of future peak demand include organic growth comprising of residential development and ICI growth, data centre expansion driven by artificial intelligence (AI), data storage and cloud computing, transportation electrification and decarbonization of building heating. Separate forecasts are presented for non-coincident summer and winter peaks, with and without the impacts of CDM, DERs, electric vehicles (EV)s and decarbonization of building heating. The effect of the GA on system peak was examined and incorporated into the analysis." (page (i))

C. "The EV charging load is expected to grow; reaching approximately 12% of the total system peak load by 2034. The CDM and DERs are expected to temper the net increase in peak demand. By 2034, Alectra Utilities is forecasting 242MW of peak demand savings due to CDM initiatives with additional 170MW from DERs." (page (ii))

D. "CDM is a cost-effective resource that reduces demand and is integrated into Alectra Utilities' load forecasting. It is achieved through a combination of building codes, energy efficiency initiatives and standards, amendments, and specific targeted program activities. ….

Similar to the estimation of peak demand savings from codes and standards, annual peak demand reduction percentages attributable to CDM program savings were projected and are shown in Figure 12. The information on CDM programs is sourced from the IESO' IRRP reports for each of Alectra's planning zoned. By 2034 Alectra Utilities' service area is

expected to achieve 242MW in peak demand savings." (page 30)

E. *"Figure 15 and Table 9 show the total MW of charging infrastructure installed to support the EV penetration to 2040. Between 2024 to 2034 EV charging infrastructure installed is expected to grow from 306MW to 5,041MW." (page 36)*

F. *"Figure 16 indicates that the maximum EV charging load is estimated to be 61MW in 2024 and increase to 1,008MW in 2034 across the entire Alectra Utilities' service territory. Most of the EV charging load is passenger LDV while the MDV and HDV accounts for approximately 15-20% of the total 1,008MW."* (page 37)

a) With respect to Preamble Item (D) and Figure 12, please provide in tabular a breakdown of total MW for each year as between: i) building codes and standards, ii) energy efficiency initiatives, iii) amendments and iv) specific targeted program activities. In addition, please provide either copies or internet links to the IESO's reports supporting these values.

b) With respect to item (E), please explain what is included in Figure 15 for EV charging structure MW (i.e. does it include all types of EV charging infrastructure identified in Table 8 on the preceding page?) and please explain how this forecast was developed.

c) Please explain how the values in Figure 16 were derived and their relationship to the values in Figure 15.

d) With respect to Figure 19 (page 40), please provide in Tabular form the total annual values for the 1-in-2 forecast demand and also provide a breakout of the impact in each year due to: i) Conservation Demand Management (CDM), including energy efficiency; ii) Distributed Energy Resources (DER) impacts; iii) Global Adjustment (GA) Impact, iv) EVs; and v) other transportation electrification (if applicable).

e) With respect to Figure 22 (page 44), please provide in Tabular form the total annual values for the 1-in-2 medium scenario forecast demand and also provide a breakout of the impact in each year due to: i) Conservation Demand Management (CDM), including energy efficiency; ii) Distributed Energy Resources (DER) impacts; iii) Global Adjustment (GA) Impact, iv) EVs; v) other transportation electrification (if applicable) and vi) decarbonization/retrofit loads.

2.0-VECC -14

Reference: Exhibit 2B, Tab 4, Schedule 1 Attachment 2B-5

EB-2023-0195 Exhibit 2A, Tab 3, Schedule 2

Guidehouse produced a similar working capital study for Toronto Hydro (June 9, 2023) for Alectra (October 30, 2024). The tables below show the respective

Revenue Lag findings:

A summary of the revenue lags for THESL's distribution business is shown below.

Table 3: Summary of Retail Revenue Lag (2022)

Description	Amounts ($M)	Lag Time Days	Weighting Factor	Weighted Lag Time Days
Retail Revenue	$3,226.79	52.62	85.00%	44.73
IESO Credits	$432.31	63.32	11.39%	7.21
Other Revenue	$136.91	33.53	3.61%	1.21
Total	**$3,796.01**		**100.00%**	**53.15**

A summary of the revenue lags for Alectra's distribution business are shown below:

Table 3: Summary of Revenue Lag (TME 2024-04-30)

Description	Amounts ($M)	Lag Days	Weighting Factor	Weighted Lag Days
Retail Revenue	$3,913.82	54.53	88.31%	48.15
IESO Credits	$461.64	61.96	10.42%	6.46
Other Revenue	$56.39	46.26	1.27%	0.59
Total	**$4,431.85**		**100.00%**	**55.20**

a) Please explain and contrast the differences that resulted in a finding for Toronto Hydro of a percentage of OM&A and Cost of power of 7.02% and a finding for Alectra of 7.92%.

2.0-VECC -15

Reference: Exhibit 2B, Tab 5, Schedule 1

Table 2-6-1: OEB-approved ICM projects

In-Service Year	Approved ICM Projects	Approved Project Costs	Actual Project Costs	Variance
2018	Leaking Transformer	8.4	7.0	(1.4)
2018	York MS - Civil Construction	2.2	2.5	0.3
2018	Road Authority YRRT - 2018	11.2	15.9	4.6
2018	Pleasant TS CCRA True Up	6.8	6.8	0.0
2019	Leaking Transformer - 2019	7.5	4.5	(3.0)
2019	Road Authority YRRT - 2019	13.3	25.4	12.1
2019	Bathurst Road Widening	5.5	2.8	(2.7)
2021	Goreway TS CCRA True Up	5.7	5.5	(0.1)
2021	Goreway Road Widening	2.1	2.4	0.3
2021	Rutherford Road Widening	2.9	3.1	0.2

2023	Cable Renewal	18.1	16.1	(2.0)
2024	Cable Renewal	17.3	13.9	(3.3)
Total		**101.0**	**105.9**	**5.0**

"*The actual capital amounts related to the 2019 YRRT were approximately $12.1MM higher than the approved amount. This variance is primarily the result of delays in placing assets in service in 2016 and 2017, which led to increased in-service additions in 2019. The York Region Rapid Transit Corporation (YYRTC), the road authority overseeing the YRRT project, was responsible for the project schedule and sequence of work. Project construction delays resulted in the delay in placing assets in service*."

a) It is not clear to us why a delay in putting the YRRT project into service would result in a $12.1 million cost overrun for the project. Please elucidate.

b) What was the forecast and actual contribution payment by the municipality with respect to the YRRT project s2018 and 2019?

2.0-VECC -16

Reference: Exhibit 2A, Tab 1, Schedule 1, Appendix G

a) Please provide the names and CVs of the authors of the Hatch study entitled "Climate Risk and Vulnerability Assessment of the Alectra Utilities' Distribution System".

2.0-VECC -17

Reference: Exhibit 2, Tab 1, Schedule 1, Appendix B08 (pgs. 312-)

Table B08 - 1 Fleet Investment Expenditures, Drivers and Outcomes

	Historical Spending					Bridge		Forecast Spending				
Year	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**
CAPEX ($MM)	8.1	6.6	4.0	7.5	6.9	12.1	12.3	24.2	23.3	18.6	17.3	14.5
Primary Driver	Syste	capital and maintenance work support										
Secondary Driver	Business operational efficiency											
Outcomes	Customer Value, Safety, Reliability, Environment and Efficiency											

a) What accounts for Alectra spending less than half as much on vehicles in the 5 years prior to 2025 as compared to the 5 years after?

2.0-VECC -18

Reference: Exhibit 2, Tab 1, Schedule 1 (pgs. 611-)

Table B14 - 8 Historical & Proposed Investment Spending

	Historical Spending					Bridge		Forecast Spending				
Year	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
Rear Lot Conversions	2.4	0.1	1.0	0.1	0.1	0.7	0.0	0.0	0.0	20.3	32.7	33.6

a) If rear-lot construction presents safety and reliability risks why were they built at these locations in the first instance?

b) If safety is an issue why has so little investment been made in this category from 2021 onward?

c) Do the municipalities (or province) served by Alectra have building codes which restrict buildings or pools where rear lot feeders exist?

d) What is the typical premium on replacing rear lot with front above ground or front underground?

e) What efforts is Alectra making to have current owners and or municipalities contribute to the premium for rear lot removal of distribution plant?

2.0-VECC -19

Reference: Exhibit 2A, Tab 1, Schedule 1, Appendix 2-AA

Table 5.4.2 - 2 System Access Investments (2027-2031)

	Forecast Period (Planned)				
System Access	**2027**	**2028**	**2029**	**2030**	**2031**
Network Metering	54.7	70.6	69.2	60.4	53.6
Customer Connections	189.8	204.0	185.2	166.6	195.2
Road Authority & Transit Projects	56.3	38.5	45.0	45.7	46.7
Transmitter Related Upgrades	5.0	0.0	0.0	0.0	0.0
Total Gross Expenditures	**305.8**	**313.1**	**299.4**	**272.7**	**295.5**
Total Contributions	**(148.1)**	**(132.7)**	**(135.2)**	**(133.6)**	**(156.8)**
Total Capital Expenditure ($MM)	**157.7**	**180.4**	**164.2**	**139.1**	**138.7**

a) Please show the capital contributions for each line item (i.e. which sums to the total contributions). Please explain how the contribution amount for each category was estimated.

b) Using the same categories as Table 5.4.2-1 show the same for the 2021 to 2026 period (i.e. Appendix 2-AA system access with contributions shown by category).

2.0-VECC -20

Reference: Exhibit 2A, Tab 1, Schedule 1, pg. 386, Appendix 2-AA

Table 5.4.2 - 4 System Service Investments (2027-2031)

	Forecast Period (Planned)				
System Service	**2027**	**2028**	**2029**	**2030**	**2031**
SCADA & Automation	8.7	9.2	15.2	21.6	18.1
Capacity (Lines)	5.2	35.5	65.6	41.9	51.1
Capacity (Stations)	24.2	25.7	58.8	63.8	119.3
System Control, Communications & Performance	0.9	9.2	11.0	5.2	3.0
Safety & Security	0.0	0.2	0.9	1.1	1.1
DER Integration	0.3	0.5	0.3	0.3	0.1
Total Gross Expenditures	**39.3**	**80.3**	**151.8**	**133.9**	**192.7**
Total Contributions	**(0.1)**	**(0.7)**	**(1.8)**	**(1.9)**	**(8.5)**
Total Capital Expenditure ($MM)	**39.2**	**79.6**	**150.0**	**132.0**	**184.2**

a) Similar to the previous question, please show the contributions by category and explain how the contribution amount was estimated.

b) Using the same categories please show the contributions for the 2010 to 2026 period (i.e. Appendix 2-AA system service contributions shown by category).

3.0 OPERATING REVENUE (EXHIBIT 3)

3.0-VECC -21

Reference: **Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 4, 20, 21 and 54-58**
Attachment 3-3, Customer and Load Forecast Input Data

Preamble: The Application states:
"*The residential customer forecast is based on a weighted population and GDP driver Cust_Var). Population captures the long-term customer growth trend and GDP helps capture customer variation and household formation associated with economic activity. Monthly customer models are estimated using linear regression*." (page 20)

Note: In its information requests 3-SEC-69 has asked:
a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.
b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following question based on the data, resulting models and Residential customer count forecast used in response to SEC. Otherwise, please base the responses to the following questions on Alectra's original Application.

a) With respect to the Residential customer count forecast, please provide separate excel spreadsheet(s) for each of the five Rate Zones setting out:

i. The historic and forecast values for each of the variables used in the regression model.

ii. Where the variable used is derived/calculated (e.g., the Cust_Var), the historic and forecast values for each of the inputs used and the calculation of the historic and forecast values used in the regression model.

iii. The calculation of the forecast Residential customer count monthly values

3.0-VECC -22

Reference: **Exhibit 2A, Tab 1, Schedule1, page 140 (Table 5.3.2-2)**
Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 3 23 and 24
Attachment 3-3, Customer and Load Forecast Input Data

a) Please provide a table that compares the 2026 to 2031 growth in population

used in Exhibit 2A with the forecasts of population growth for Toronto, Hamilton and Guelph used in Exhibit 3, Attachment 3-2.

b) Please explain why it is appropriate to use materially lower population forecasts in Exhibit 3 as compared to those used in Exhibit 2A.

c) In its information requests 3-SEC-69 has asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application and a different population forecast was used in the response to SEC, then please provide a table that compares the 2026 to 2031 growth in population used in Exhibit 2A with the forecasts population growth for Toronto, Hamilton and Guelph used in the response to SEC.

3.0-VECC -23

Reference: Exhibit 2A, Tab 1, Schedule1, page 140 (Table 5.3.2-2)
Exhibit 3, Tab 1, Schedule1, Attachment 3-2, page 4 (Table 2)

a) Please provide a table that compares the 2026 to 2031 growth in households used in Exhibit 2A with the forecast for total Residential customer count growth in Exhibit 3, Attachment 3-2.

b) Please explain why it is appropriate to use a materially lower 2026 to 2031 Residential customer count growth rate for revenue forecasting purposes as compared to the household growth rate used for system planning purposes.

c) In its information requests 3-SEC-69 has asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application, please provide a table that compares the 2026 to 2031 growth in households used in Exhibit 2A with the forecast for total Residential customer count growth in the response to SEC.

3.0-VECC -24

Reference: Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 59-63
Exhibit 3, Tab 1, Schedule 3, page 1

Preamble: In its information requests 3-SEC-69 has asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following question based on the data, resulting models and GS<50 customer count forecast used in response to SEC. Otherwise, please base the responses to the following questions on Alectra's original Application.

a) With respect to the GS<50 customer count forecast, please provide separate excel spreadsheet(s) for each of the five Rate Zones setting out:
   i. The historic and forecast values for each of the variables used in the regression model.
   ii. Where the variable used is derived/calculated (e.g., the Econ.Cust_Var), the historic and forecast values for each of the inputs used and the calculation of the historic and forecast values for the input variable used in the regression model.
   iii. The calculation of the forecast GS<50 customer count monthly values.

b) Please provide a schedule that sets out the historic and forecast (2017-2031) GS<50 annual customer counts and resulting total. Note: This table should be based on the results of the models (page 59-63) and prior to any of the adjustments describe in Exhibit 3, Tab 1, Schedule 4, section 4.3.

3.0-VECC -25

Reference: **Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 64-71**

Preamble: Attachment 3-2 uses models to forecast the customer counts for the following classes: BRZ GS 50-699; BRZ GS 700-4999; ERZ GS 50-499; ERZ GS 500-4999; GRZ GS 50-999; GRZ 1000-4999; HRZ GS>50 and PRZ GS >50.

In its information requests 3-SEC-69 has asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following question based on the data, resulting models and GS>50 customer count forecast used in response to SEC. Otherwise, please base the responses to the following questions on Alectra's original Application.

a) With respect to the GS>50 customer count forecast, please provide separate excel spreadsheet(s) for each of the rate classes noted in the Preamble

setting out:

i. The historic and forecast values for each of the variables used in the regression model.
ii. Where the variable used is derived/calculated (e.g., Econ.GSP50_Cust), the historic and forecast values for each of the inputs used and the calculation of the historic and forecast values for the input variable used in the regression model.
iii. The calculation of the forecast customer count monthly values.

b) Please provide a schedule that sets out the historic and forecast (2017-2031) annual customer counts for each of the noted rate classes and the resulting totals for GS>50-Regular, GS>50-Intermediate and GS>50-Overall. Note: This table should be based on the results of the models (page 64-71) and prior to any of the adjustments describe in Exhibit 3, Tab 1, Schedule 4, section 4.3.

3.0-VECC -26

Reference: **Exhibit 3, Tab 1, Schedule 3, page 1**
Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 18
Exhibit 3, Tab 1, Schedule 4, Tables 3-1-6 and 3-1-7
Attachment 3-3, Customer and Load Forecast Input Data

Preamble: The Application states:

"*Large Use customer class consists of 36 customers by 2031 across the rate zones*." (page 18)

a) Please confirm that the Large Use customer count as of April 2025 is 31 (i.e., BRZ-6, ERZ-11, GRZ-4, HRZ-7 and PRZ-3) per Attachment 3-3.

b) Please provide a schedule setting out the baseline (i.e., prior to the adjustments described in section 4.3.3) customer/connections/devices forecast using the same customer classes as in Tables 3-1-6 and 3-1-7 for 2024-2031.

c) Please confirm that the baseline forecast for the Large Use class increases by one between April 2025 and the end of 2031. If not, please reconcile the 36 Large Use customers at the end of 2031 with the addition of the 4 new Large Use customers discussed in section 4.3.3.

3.0-VECC -27

Reference: **Exhibit 3, Tab 1, Schedule 3, page 1 (Table 3-1-5)**

Exhibit 3, Tab 2, Schedule1, page 6

Preamble: The Application states:

"*The street lighting connection counts from 2020 to 2024 show a steady growth trend, forming a sound basis for forecasting. The Bridge Years (2025–2026) reflect a moderate growth rate. The Test*

Years (2027–2031) include a significant structural adjustment in 2027 in the BRZ Street Lighting rate class as described in Exhibit 3, Tab 1, Schedule 4." (page 6)

a) Please provide a revised version of Table 3-1-5 that includes 2024, 2025 and 2026 and for Street Lighting includes the forecast prior to the structural adjustment in 2027 in the BRZ Street Lighting rate class as described in Exhibit 3, Tab 1, Schedule 4.

b) Please explain how the forecast connection/device forecast was developed for each of the Street Lighting, Sentinel Lighting and USL classes (Note: For Street Lighting please describe the basis for the forecast prior to the structural adjustment in 2027 for the BRZ Street Lighting rate class as described in Exhibit 3, Tab 1, Schedule 4).

c) If the Street Lighting, Sentinel Lighting or USL classes rely on the use of model, please provide an excel spreadsheet(s) for rate class setting out:
   i. The historic and forecast values for each of the variables used in the regression model.
   ii. Where the variable used is derived/calculated, the historic and forecast values for each of the inputs used and the calculation of the historic and forecast values for the input variable used in the regression model.
   iii. The calculation of the forecast connection/device monthly count values.

3.0-VECC -28

Reference: Exhibit 3, Tab 1, Schedule 4, pages 1-3

a) Please provide a table setting out the baseline customer/connection/device forecast for the years 2025-2031 (i.e., prior to the adjustments described in section 4.3).

3.0-VECC -29

Reference: Exhibit 3, Tab 1, Schedule 4, pages 8-9
Attachment 3-3, Customer and Load Forecast Input Data

Preamble: The Application states:

A. "*In 2024, Alectra Utilities reclassified 282 customers from the GS>50 kW, Regular to the GS<50 kW rate class, and 2 customers from the GS>50 kW, Intermediate to the GS<50 rate class. Additionally, 48 customers were reclassified from the GS<50 kW to the GS>50 kW, Regular rate class, 26 customers from the GS>50 kW, Intermediate to the GS>50 kW, Regular rate class, and 4 customers from the GS>50 kW, Regular to the GS>50 kW, Intermediate rate class. These reclassifications were driven by customers' average demand over the prior 12 months falling outside the applicable thresholds for their existing rate class at the time of the reclassification assessment. It is assumed that the same*

number of reclassifications will occur in 2025 and 2026."

B. "*For example, demand for each customer in the BRZ that is forecasted to be reclassed from the GS>50 kW, Regular rate class to the GS>50 kW, Intermediate rate class, is based on the 700 kW lower threshold of the GS>50 kW, Intermediate rate class. Alectra Utilities then further prorated this reclassification to exclude the four (4) months of 2025 actual data available at the time of producing the base load forecast (January to April 2025). Therefore, the first-year demand is estimated to be 3,220 kW (700 kW x 115% x 50% x 8 months), and all subsequent years' demand for these same customers will be 9,660 kW (700 kW x 115% x 12 months*)."

a) Please confirm that the net impact of the 2024 reclassifications was: i) an increase in the GS<50 count of 236, ii) a decrease in the GS>50-Regular count of 212 and iii) a decrease of 24 in the GS>50-Intermediate count.

b) Please confirm that, per Preamble Item (B), no customers were reclassified in the first four months of 2025.

c) Please provide the actual customer reclassification that occurred in 2025 and indicate the extent to which these reclassifications are reflected in the updated data requested in 3-SEC-69.

3.0-VECC -30

Reference: **Exhibit 2A, Tab 1, Schedule 1, pages 91 and 143**
Exhibit 2A, Tab 1, Schedule 1, Appendix B-10, page 400
Exhibit 2A, Tab 1, Schedule 1, Appendix J, page 23
Exhibit 3, Tab 1, Schedule 4, page 13 (Table 3-1-19)

Preamble: The Application states:

A. "*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*." (page 143)

B. "*A large data centre compound has been developed in the Leslie St/Elgin Mills Rd area in the Town of Richmond Hill since 2016 and six buildings (DC1 to DC6) have been proposed. Three buildings have been built and one is under construction. Two more buildings are to be built in the next 5 years. The total data centre capacity requested in this area is 176MW.*" (Appendix J, page 23)

a) Please demonstrate how the Large Use customer count forecast adjustments set out in Table 3-1-19 align with Alectra's expectations regarding new large load connections, particularly new data centres locating

in its service area.

3.0-VECC -31

Reference: **Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 1, 9, 11 and 54-58**

Preamble: The Application states:

A. "*Baseline sales and customer forecasts (before electrification adjustments) are developed for each of the primary rate classes. The residential forecast is based on separate customer and average use models*" (page 9)

B. "*Residential average use, and GSL50 and GSP50 sales forecasts are estimated using an end-use framework that integrates economic, weather, and end-use intensity trends into a heating variable (XHeat), cooling variable (XCool), and a base-use variable* (XOther)." (page 9)

C. *"The average use forecast is derived from a linear regression model that relates historical monthly average use with the constructed end-use variables - XCool, XHeat, and XOther. The estimated end-use model coefficients (bc, bh, and bo) "statistically" adjust the end-use variables to actual usage*." (page 11)

D. "*COVID-19 had a significant impact on customer usage. In 2020, residential sales jumped 13.1% while commercial sales fell 6.0% largely because of the "work at home" mandate*." (page 1)

Note: In its information requests 3-SEC-69 asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following question based on the data, resulting models and Residential average end use forecast used in response to SEC. Otherwise, please base the response to the following questions on Alectra's original Application.

a) With respect to the Residential average end use models, please provide separate excel spreadsheet(s) for each of the five Rate Zones setting out:

i. The historic and forecast monthly values for each of the variables used in the regression model.

ii. Where the variable used is derived/calculated (e.g., XHeat, XCool and

XOther), the historic and forecast values for each of the inputs used in the calculation, the sources for the inputs used and the calculation of the historic and forecast values for the variable used in the regression model.

iii. The calculation of the forecast Residential average use based on the model's coefficients and the forecast values for each of the explanatory variables.

iv. The calculation the monthly sales based of the results of part (iii) and the forecast of the Rate Zone's customer count for the month.

v. The forecast annual Residential sales by Rate Zone based the sum of the monthly results from part (iv) and the resulting overall Residential sales forecast for each year (2025-2031). Note: These values should reconcile with those in Table 3-1-6.

b) It is noted that, despite the comment noted in Preamble Item (D), none of the Residential models appear to include a variable to capture the impact of COVID. Were any COVID related variables tested? If yes, what variables were tested and what were the results? If not, why not?

3.0-VECC -32

Reference: Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 9, 15, 16 and 59-63

Preamble: The Application states:

A. "*Residential average use, and GSL50 and GSP50 sales forecasts are estimated using an end-use framework that integrates economic, weather, and end-use intensity trends into a heating variable (XHeat), cooling variable (XCool), and a base-use variable* (XOther)." (page 9)

B. "*The variable Peel_Retail_Rec captures the sharp drop in 2020 sales resulting from the COVID "work at home" mandate*." (page 15)

C. "*The GSL50 (small C&I less than 50 kW demand) and GSP50 (greater than 50 KW) models are generally based on an SAE specification*." (page 16)

Note: In its information requests 3-SEC-69 asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following question based on the data, resulting models and GS<50 sales

forecast used in response to SEC. Otherwise, please base the response to the following questions on Alectra's original Application.

a) With respect to the GS<50 sales models, please provide separate excel spreadsheet(s) for each of the five Rate Zones setting out:

   i. The historic and forecast monthly values for each of the variables used in the regression model.

   ii. Where the variable used is derived/calculated (e.g., XHeat, XCool and XOther), the historic and forecast values for each of the inputs used in the calculation, the sources for the inputs used and the calculation of the historic and forecast values for the variable used in the regression model.

   iii. The calculation of the forecast GS<50 monthly sales based on the model's coefficients and the forecast values for each of the explanatory variables.

   iv. The forecast annual GS<50 sales by Rate Zone based the sum of the monthly results from part (iii) and the resulting overall Alectra GS<50 sales forecast for each year (2025-2031). Note: These values should reconcile with those in Table 3-1-6.

b) Please explain what each of the following variables used in the models represents:

   i. GMRVariables.Peel.Retail_Rec (page 59)

   ii. GMR.Ham_Workplace (page 62)

   iii. GMR.York_Workplace (page 63)

c) For those GS<50 models that do not include a COVID-related variable, please explain why.

3.0-VECC -33

Reference: **Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 9, 16 and 64-71**

Preamble: Attachment 3-2 uses models to forecast the sales for the following classes: BRZ GS 50-699; BRZ GS 700-4999; ERZ GS 50-499; ERZ GS 500-4999; GRZ GS 50-999; GRZ 1000-4999; HRZ GS>50 and PRZ GS >50.

The Application states:

A. "*The residential, GSL50, and GSP50 rate classes are based on models that incorporate economics, weather, and a structural component that captures change in end-use saturation, end-use efficiency, and improvements in structural integrity. The larger rate classes (GSP500, GSP700, and GSP1000) are modeled using a generalized regression model*

designed to capture recent sales and customer trends." (page 9)

B. "*The GSL50 (small C&I less than 50 kW demand) and GSP50 (greater than 50 KW) models are generally based on an SAE specification*."(page 16)

Note: In its information requests 3-SEC-69 asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following question based on the data, resulting models and GS>50 sales forecast used in response to SEC. Otherwise, please base the response to the following questions on Alectra's original Application.

a) With respect to the GS>50 sales models, please provide separate excel spreadsheet(s) for each of the five Rate Zones setting out:

i. The historic and forecast monthly values for each of the variables used in the regression model.

ii. Where the variable used is derived/calculated (e.g., XHeat, XCool and XOther), the historic and forecast values for each of the inputs used in the calculation, the sources for the inputs used and the calculation of the historic and forecast values for the variable used in the regression model.

iii. The calculation of the forecast GS>50 monthly sales based on the model's coefficients and the forecast values for each of the explanatory variables.

iv. The forecast annual GS>50 sales by Rate Zone based the sum of the monthly results from part (iii).

v. The resulting overall Alectra sales forecast for each year (2025-2031) for GS>50 Regular and GS>50-Intermediate. Note: These values should reconcile with those in Table 3-1-6.

b) Please explain what each of the following variables used in the models represents:

i. LostLoadIndex.LL_BRZ_GSP50 (page 64)

ii. GMRVariables.Peel.Workplace (pages 65 and 67)

c) For those GS>50 models that do not include a COVID-related variable, please explain why.

3.0-VECC -34

Reference: Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 18
Exhibit 3, Tab 1, Schedule 4, pages 12-14 (section 4.3.3)

Preamble: .The Application states:

"*Large Use customer class consists of 36 customers by 2031 across the rate zones. A separate forecast is generated for each customer. The forecast starts with a simple exponential smoothing model that captures the customer monthly usage pattern but does not presuppose any continued growth; sales are held at current levels. Sales are then adjusted for future growth (or loss) based on the Alectra Staff's consultation with the customers and internal analysis. This includes sales for new customers, customers that move from another rate class, and future expansion and contractions*." (page 18 – emphasis added)

Note: In its information requests 3-SEC-69 asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following questions based on the data and results used in response to SEC. Otherwise, please base the response to the following questions on Alectra's original Application.

a) Are any adjustments (as described in the emphasized part of the Preamble) made to the results from the exponential smoothing models for purposes of establishing the baseline forecasts for the Large Use and LUDA classes or are these adjustments all made in section 4.3.3.

b) If any adjustments were made for purposes of establishing the baseline customer count or sales forecasts please describe what they were.

3.0-VECC -35

Reference: Exhibit 3, Tab 1, Schedule1, page 3
Exhibit 3, Tab 1, Schedule 4, page 2

Preamble: .The Application states:

"*Linear trend analysis models are used to forecast USL, Sentinel, and Street Lighting rate classes' consumption. These forecasts form Alectra Utilities' baseline load projections for the forecast period from May 2025 through to the end of 2031. The forecast for the Embedded Distributor class is developed outside of regression-based statistical modeling, based on the actual load*

profile of the only customer in this rate class." (page 3)

Note: In its information requests 3-SEC-69 asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following questions based on the data and results used in response to SEC. Otherwise, please base the response to the following questions on Alectra's original Application.

a) Please provide: for each of the USL, Sentinel, and Street Lighting rate classes: i) the linear trend model used and ii) the derivation of the month forecasts for 2025-2031 based on the application of the model.

3.0-VECC -36

Reference: Exhibit 3, Tab 1, Schedule1, page 19
Exhibit 3, Tab 1, Schedule 4, page 2

Preamble: The Application states:

"*Baseline billing demand forecasts are calculated for rate schedules General Service greater than 50 kW (GSP50) and higher (those rates that have billing demands). The billing demand forecasts are based on a billing demand load factor which relates monthly billing demand to monthly sales. The billing demand factor is calculated as the ratio of monthly average hourly use to monthly billed demand. The forecast is based on an average of the historical monthly load factors (usually set as an average of the prior three years*)." (page 19)

Note: In its information requests 3-SEC-69 asked:

a. Please provide actual data for customer numbers, kWhs and kWs for 2025 from May to the end of the year and 2026 actuals to date.

b. Please rerun the load forecast and provide an updated Attachment 3-1 - OEB Appendix 2-IB - Load Forecast Analysis.

If Alectra proposes to adopt the results of the SEC request for purposes of its Application then please respond to the following questions based on the data and results used in response to SEC. Otherwise, please base the response to the following questions on Alectra's original Application.

a) For each demand billed rate class please provide: i) the "billing demand load factor used" and ii) how it was determined.

3.0-VECC -37

Reference: Exhibit 2A, Tab 1, Schedule1, DSP Appendix J
Exhibit 3, Tab 1, Schedule 4, pages 3-6

a) Were the same assumptions regarding the future EV population in Alectra's service area and usage in Alectra's service area used in both Exhibit 2A and Exhibit 3?

b) Please provides revised versions of Tables 3-1-8 and 3-1-9 that separate out the impact of EVs and Building Electrification.

c) For the demand-billed customer classes, how was the billing demand associated with EVs established?

3.0-VECC -38

Reference: Exhibit 3, Tab 1, Schedule 4, page 6
Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 32-33

Preamble: The Application states:

"*Building electrification is another contributor to sales growth. Alectra Utilities System Planning Team has developed Low, Medium, and High adoption scenarios. This load and customer forecast is based on the Medium scenario. Under the Medium scenario, the percentage of new residential customers with all-electric homes start at 3% and ramp up to 100% by 2030; this results in roughly 26,000 new all-electric homes by 2031. Under the Medium scenario retrofit market, the number of homes that convert to electric heat and water increases from 1% of the housing stock to 6% by 2030. This translates into roughly 51,000 homes converting from fossil fuel heat to electric heat by 2031*." (page 6)

a) Please provide a schedule that shows separately the building electrification impacts (MWh and billing MW {if applicable}) by rate class as between Residential and Commercial for 2025 to 2031.

b) With respect to Residential electrification, is t assumed that any new all-electric residential customers as well as any retrofits of existing residences will use heat pumps?

c) With respect to Residential electrification, please provide a schedule that for each of the years 2025-2031 sets out: i) the assumed number of retro-fits and the assumed number of new residences that will be all-electric (both incrementally and cumulatively), ii) the assumed annual use per residence and iii) the resulting incremental sales impact (both incrementally and cumulatively).

3.0-VECC -39

Reference: Exhibit 3, Tab 1, Schedule 4, page 6
Exhibit 3, Tab 1, Schedule1, Attachment 3-2, pages 34-35

Preamble: The Application states:

A. "*Commercial electrification sales are based on System Planning's load estimates for both new construction and retrofit, by rate zone. The load forecast is translated to a sales forecast using an average annual load factor based on an estimated commercial electric heat load factor of 0.20. Commercial building simulation data for New York and the Pacific Northwest indicate that electric heat load factors vary between 0.10 and 0.15, but the simulations are based on much warmer weather conditions. Reflecting colder temperatures in Alectra Utilities' service territory, the sales forecast is based on a 0.20 load factor*." (page 6 – emphasis added)

B. *"Commercial electrification sales are based on system planning's expected case. System planning provided MW estimates for both new construction and retrofit by rate zone. The MW forecast is translated to energy using an average annual load factor based on an estimated commercial electric heat load factor of 0.20*." (Attachment 3-2, page 34- emphasis added)

a) Please provide a schedule that sets out the 2025-2031 MW and MWh values from Figure 25 (Attachment 3-2).

b) Please indicate where in Exhibit 2A System Planning's MW estimates for both new construction and retrofit by rate zone are provided. If the basis for the commercial electrification assumptions regarding new construction and retrofit is not described in Exhibit 2A, please explain how the estimates were developed.

c) Please provide a schedule that sets out, for each year 2025-2031, the MWh associated with commercial electrification by rate class (i.e., GS<50, GS>50 and Large Use {if applicable}) as a percentage of the forecast baseline energy sales for the rate class.

3.0-VECC -40

Reference: Exhibit 3, Tab 1, Schedule 4, pages 8-11

Preamble: The Application states:

A. "*Alectra Utilities adjusted its customer count forecast to reflect the estimated number of customer reclassifications among the General Service rate classes. The estimated reclassifications from 2025 to 2031 are based on actual activity in 2024. In 2024, Alectra Utilities reclassified 282*

customers from the GS>50 kW, Regular to the GS<50 kW rate class, and 2 customers from the GS>50 kW, Intermediate to the GS<50 rate class. Additionally, 48 customers were reclassified from the GS<50 kW to the GS>50 kW, Regular rate class, 26 customers from the GS>50 kW, Intermediate to the GS>50 kW, Regular rate class, and 4 customers from the GS>50 kW, Regular to the GS>50 kW, Intermediate rate class. …..
It is assumed that the same number of reclassifications will occur in 2025 and 2026, and gradually decrease each year from 2027 to 2031," (pages 8-9)

B. "*Alectra Utilities has also adjusted its load forecast based on an estimation of the demand and consumption related to the forecast of customer count rate reclassifications. When determining whether a customer should be reclassified, Alectra Utilities reviews whether the customer's average consumption or demand (as applicable) for the past 12 months is outside a 10% upper or lower limit. Therefore, to estimate the demand change associated related to the forecast of customer count rate reclassifications, Alectra Utilities has assumed that the customers subject to the rate reclassification adjustments, will have, on average, surpassed the threshold of the new rate class by 15% (i.e., a moderately larger amount than the 10% upper or lower limit). A half- year rule is also applied to the first year in which the group of customers are forecasted to be reclassed, as it is assumed that the average reclassification will occur at the half year-point of the year*." (page 9)

C. "*An increase in one rate class is typically coupled with a corresponding decrease to another class, except in the case that a customer is reclassed downwards to GS<50 kW, wherein the estimated demand billing determinant associated with the customer's previous rate class is removed from the load forecast, as the GS<50 kW rate class is not billed on demand. Therefore, the total forecasted demand will be effectively reduced by the demand associated with the reclassed customers from the GS>50 kW to the GS<50 kW rate class*." (page 10)

a) Please provide a schedule that for each year (2025-2031) separates out the impact on customer count, sales (MWh) and billing demand (MW) of each of the following: i) the assumed reclassification of customers from GS<50 to GS>50; ii) the assumed reclassification of customers from GS>50 to GS<50 and iii) the assumed reclassification of customer between GS>50 classes.

3.0-VECC -41

Reference: **Exhibit 3, Tab 1, Schedule 4, pages 11-12**
Exhibit 8, Tab 2, Schedule 2, page 15

Preamble: The Application states:

A. "*Alectra Utilities has adjusted its load forecast to include demand and consumption due to standby power for rate design purposes beginning in 2027. For information on the standby power rate design and its inclusion in the load forecast, refer to Exhibit 8, Tab 2, Schedule 2.*

A 3-year average of billed demand data was utilized for the inclusion of standby demand data in the load forecast. Standby customers that are billed on gross load were already included in the base load forecast. Other types of Standby customers (not gross load billed) were excluded from the baseline forecast, with the exception of the GRZ's standby customers, who are by default included in the baseline forecast due to billing system configuration, where the data is sourced from." (3-1-4, page 11).

B. "*Tables 3-1-17 and 3-1-18 illustrate the adjustments that were made to the consumption and billed demand forecasts, respectively, as a result of standby power. No adjustments are necessary to the customer count, as Alectra Utilities applies a monthly fixed charge at a prevailing General Service rate class to standby customers*." (3-1-4, page 11)

C. "*The elimination of the Standby Power rate class involves moving these customers to the GS>50 kW or Large Use/Large Use with Dedicated Assets class based on their firm and standby power load requirements, and then determining the resulting cost allocation and rate design impacts. In its 2027 cost allocation model Alectra Utilities added the numbers of customers and kW/kWh values associated with these customers to the applicable rate class*." (8-2-2, page 15)

a) Please identify those rate zones were some (or all) of the Standby customers are billed on a gross load basis, such that the Standby demand is included in the baseline forecast.
   i. If all of the Standby customers in any of these rate zones were not billed on a gross load basis, please explain why.

b) Please explain how GRZ's standby customers are currently billed for Standby service.

c) Please explain why it is necessary to make a Standby adjustment for MWhs as well as MWs and how the MWh adjustment was determined.

d) For customers in the current HRZ Standby class, does the class include: i) each customer's firm load and standby load or ii) just the standby load and

the firm portion of the load is included in the relevant GS>50 kW or Large Use/Large Use with Dedicated Assets class?

e) Exhibit 3 (3-1-4, page 11) states that no adjustment to the customer count for the GS>50 kW or Large Use/Large Use with Dedicated Assets classes was required. However, Exhibit 8 (8-2-2, page 15) states that an adjustment to the customer counts for these classes was made. Please reconcile.

3.0-VECC -42

Reference: **Exhibit 3, Tab 1, Schedule 4, pages 12-14**

Preamble: The Application states:

A. "*Alectra Utilities has adjusted its load forecast to include additional Large Use customers. These customers include new customers and existing GS>50 kW customers who are likely to increase their demand to Large Use thresholds (5 MW) by 2031*." (page 12).

B. "*Alectra Utilities reviewed project-specific information, in order to determine whether the customer is likely to be a Large Use customer over the rate period. Information reviewed included whether the customer is an existing customer, if a temporary connection with Alectra is already established, if the project is currently under construction, and whether an Offer to Connect has been executed. If the project was deemed likely to be operational by 2031, a load of 5 MW (60 MW annually), has been added to the year in which the customer is likely to be operational*." (page 13)

a) Please confirm that the adjustment made to 2027 (Tables 3-1-19, 3-1-20 and 3-1-21) is with respect to an existing GS>50-Intermediate customer that is assumed to increase its load so as to be reclassified to the Large Use Class.
   i. If yes, why isn't the increase in Large Use load (MW and MWh) greater than the decrease in GS>50-Intermediate load (MW and MWh) – with the difference being the assumed increase such that the customer needed to be reclassified?

b) Similarly, please confirm that the additional adjustment starting in 2030 is with respect to an existing GS>50-Regular customer that is assumed to increase its load so as to be reclassified to the Large Use Class.
   i. Again, If yes, why isn't the increase in Large Use load (MW and MWh) greater than the decrease in GS>50-Regular load (MW and MWh) – with the difference being the assumed increase such that the customer needed to be reclassified?

c) If the adjustments are based on project specific information (per Preamble Item (B)), why is the demand in each case assumed to be only 5 MW per month which is threshold level for a customer to be classified as a large user?

d) Please explain how the additional MWhs in Table 3-1-20 were determined.

3.0-VECC -43

Reference: **Exhibit 3, Tab 1, Schedule 4, pages 15**

Preamble: The Application states:

"*In addition, Alectra Utilities conducted a review of its FIT customers and has determined that current ERZ and GRZ customers in the GS>50 kW rate class require reclassification to the GS<50 kW rate class, as their consumption due to inverter load is below 50 kW. Therefore, Alectra Utilities has made load forecast adjustments to the consumption and demand in relation to these planned reclassifications to the General Service rate classes. Annual average consumption and demand was based on a recent year of billed data. The baseline load forecast did not include the number of FIT customers, so an adjustment was also made to include the number of FIT customers from all rate zones into the load forecast*." (emphasis added)

a) The first underlined part of the Preamble suggests that ERZ's and GRZ's FIT customers are currently included in the GS>50 class. However, the second underlined part indicates that they are not in the baseline forecast. Please clarify the current customer classification treatment of ERZ's and GRZ's FIT customers.

4.0 OM&A (EXHIBIT 4)

4.0 -VECC -44

Reference: **Exhibit 4 Appendix 2-JC**

Table 4-1-6 - Inflation Calculation

	2017	2018	2019	2020	2021	2022	2023	2024
Inflation	1.9%	1.2%	1.5%	2.0%	2.2%	3.3%	3.7%	4.8%
Cohort 3	1.6%	0.9%	1.2%	1.7%	1.9%	3.0%	3.4%	4.5%

**Cohort 3 assumes a stretch reduction of 0.3%*

a) Please provide a similar table as above showing the annualized CPI as reported by the Statistics Canada (or Bank of Canada) for the years 2017 through 2025.

4.0 -VECC -45

Reference: Exhibit 4, Tab 5, Schedule 1

a) If Alectra is a member of the Electricity Distributor Association (EDA) please provide the annual membership fees for the 2020 to 2027 period.

b) If Alectra purchases insurance from MEARIE please provide the annual fees paid for the 2020 to 2027 period.

4.0 -VECC -46

Reference: Exhibit 4, Tab 1, Schedule 5, page 1-2

"*Specifically, the peer group5 for this benchmarking analysis included Elexicon Energy Inc., Enova Power Corp., GrandBridge Energy Inc., Hydro One Networks Inc., Hydro Ottawa Limited, London Hydro Inc., and Toronto Hydro Electric System Limited*."

Table 4-1-8: OM&A ($) per Customer

	2019	2020	2021	2022	2023	2024
Alectra	252	270	258	269	266	269
Peer Group Avg	279	293	297	315	326	342

Table 4-1-9 : OM&A ($) per Primary Circuit KM

	2019	2020	2021	2022	2023	2024
Alectra	12,528	13,482	12,732	13,310	13,079	13,178
Peer Group Avg	12,930	13,676	13,797	14,536	15,136	16,111

a) Please recast these tables by removing Hydro One from the peer group. If 2025 data is available please add that year to the revised tables.

4.0 -VECC -47

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

Table 4-2-3: Asset Management Program Expenditures by Segment ($MM)

Asset Management Program Costs ($MM) – Historic Period								
Year	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**
Total	5.52	4.56	5.96	5.22	4.61	4.90	5.30	6.45
Asset Management	5.52	4.56	5.96	5.22	4.61	4.90	5.30	6.44
Grid Modernization	—	—	—	—	—	—	—	0.01

Program Costs ($MM) – Bridge and Forecast Period								
Year	2025	2026	2027	2028	2029	2030	2031	
Total	9.64	9.63	9.26	10.52	11.09	11.49	11.89	
Asset Management	8.69	8.71	8.27	8.83	9.11	9.43	9.77	
Grid Modernization	0.94	0.92	0.99	1.69	1.99	2.05	2.12	

a) What are the incremental FTEs associated with Grid Modernization program beginning in 2024?

b) For each category, please show the spending for each year as allocated between labour and non-labour costs and show the labour component as a percentage of total cost.

c) Should Alectra reduce or increase the magnitude of its planned capital expenditures for the 2026-2031 period how would this impact spending on asset management?

d) How many FTEs are dedicated to working on distribution grid issues related to DERs, Non-Wire Solutions and Energy Storage Solutions?

4.0 -VECC -48

Reference: Exhibit 4, Tab 2, Schedule 1, pages 21, 26-

"*The larger Asset Management Segment can be further broken down into three functions:*

1. System Planning & Electrification

2. Asset Sustainment and Standards

3. Capital Investment Planning"

a) Please recast Table 4-2-3 to show the spending separately in each of these three areas.

b) Should Alectra change the amount of its planned capital expenditures for the 2026-2031 period how would this impact spending on asset management and in particular the category of Capital Investment Planning?

4.0 -VECC -49

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

Table 4-2-6: Distribution Design Program Summary

Program Outcomes: Customer Focus, Operational Effectiveness, Public Policy Responsiveness							
Program Net Costs ($MM) - Historic Period							
2017	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**
3.91	3.93	5.99	6.58	6.27	6.88	7.30	7.09
Program Net Costs ($MM) - Bridge and Forecast Period							
2025	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	
8.02	8.60	9.61	10.61	11.41	12.07	12.58	

The Program consists of three functional areas:

- *Customer Initiated Work;*
- *Distribution Support Services; and*
- *Asset Management Driven Work (Planned Capital Work).*

Table 4-2-9: Forecasted Gross Capital Spending ($MM)

	FORECASTED GROSS CAPITAL EXPENDITURES						
Segment	**2025**	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**
Customer Initiated Work	222.82	211.16	221.29	248.23	245.72	218.35	239.19
Distribution Support Services	3.86	4.02	5.24	5.42	5.41	5.26	5.46
Asset Management Driven Work	147.63	140.90	171.04	213.41	297.43	367.42	385.67
Total	374.31	356.08	397.57	467.06	548.56	591.04	630.32

a) Please show the spending in Table 4-2-6 as allocated between labour and non-labour costs and also show the labour component as a percentage of total cost for each year.

b) Please recast Table 4-2-6 to show the OM&A spending in each of the three areas discussed and identified by capital expenditures in Table 4-2-9.

c) Should Alectra change the magnitude of its planned capital expenditures for the 2026-2031 period how would this change spending on asset management driven work?

4.0 -VECC -50

Reference: Exhibit 4, Tab 2, Schedule 3

Table 4-2-13: Regulatory Segment Expenditures ($MM)

Regulatory Segment Costs ($MM) – Historic Period								
Year	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**
Total	6.82	6.96	8.05	6.87	6.80	7.19	7.25	7.32
Segment Costs ($MM) – Bridge and Forecast Period								
Year	**2025**	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	
Total	8.50	8.56	15.03	15.34	15.67	16.00	16.34	

a) Please provide a more detailed table of 4-2-13 which shows separately:
   i. OEB annual assessment cost;
   ii. OEB annual section 30 costs; and
   iii. Annual amortized Alectra application costs

4.0 -VECC -51

Reference: Exhibit 1, Tab 6, Schedule 4 /Exhibit 4, Tab 4, Schedule 2

Table 1-6-33: Productivity Framework Reported Savings

Productivity Framework Reported Savings ($MM)			
Year	**2022**	**2023**	**2024**
Incremental Savings			
Achieved/ Expected Reduction	0.2	2.8	7.8
Avoided Cost	0.0	0.2	2.8
Efficiency Benefit	0.6	1.2	1.4
	0.9	4.2	11.9
Prior Year Sustained			
Achieved/ Expected Reduction	0.7	1.1	4.1
Avoided Cost	0.0	0	0.2
Efficiency Benefit	0.0	0.6	1.9
	0.7	1.8	6.1
Total Benefits	**1.9**	**5.9**	**18.2**

Table 4-2-38: Business Transformation Segment Expenditures ($MM)

Business Transformation								
Segment Costs ($MM) – Historic Period								
Year	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**
Total	4.62	3.90	2.78	2.04	2.19	3.12	3.43	3.79
Segment Costs ($MM) – Bridge and Forecast Period								
Year	**2025**	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	
Total	4.28	4.19	5.05	5.05	5.31	5.47	5.64	

"*The Business Transformation segment drives improvements in Alectra Utilities' organizational effectiveness and strategy delivery through change management, process optimization, and project/portfolio management. This segment oversees the Productivity Framework, as further detail in (Exhibit 1, Tab 6, Schedule 5), partnering with the business to deliver and report on 2 productivity gains. The team also leads the Transformation Management Office coordinating and executing strategic initiatives while supporting transformation through project management, organizational improvement, and change management functions*."

a) Are the costs of the Business Transformation Segment (Table 4-2-38) netted from the calculation of productivity savings (Table 1-6-33). If so, how and if not why are the costs of this group not considered in the net calculation of productivity savings?

4.0 -VECC -52

Reference: Exhibit 4, Tab 2, Schedule 7

Table 4-2-55: Historical and Forecast Call Volumes, Service Level, AHT and Total Call Hours

	2017	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**
Call Volume	808,741	764,999	769,870	612,466	556,110	527,916	606,388	636,233
Calls Answered Within 30 Seconds	643,087	594,203	583,422	409,953	393,162	373,161	323,486	189,484
Telephone Accessibility Service Level	79.5%	77.7%	75.8%	66.9%	70.7%	70.7%	53.3%	29.8%
Average Handle Time (Minutes)	7.04	7.04	7.48	8.44	9.10	9.58	10.13	11.45
Total Call Hours	3	3	6	0	5	3	4	8

	2025	2026	2027	2028	2029	2030	2031
Call Volume	654,755	625,565	650,133	670,431	695,138	736,844	723,860
Calls Answered Within 30 Seconds	360,115	337,805	422,587	455,893	521,353	552,633	579,088
Telephone Accessibility Service Level	55%	54%	65%	68%	75%	75%	80%
Average Handle Time (Minutes)	11.45	11.45	11.45	11.45	11.45	11.45	11.45
Total Call Hours	0	4	8	0	9	1	8

a) It is unclear to us the definition of "Total Call Hours" and how it is estimated for the years 2025 through 2031. Please elucidate.

4.0 -VECC -53

Reference: Exhibit 4, Tab 2, Schedule 7, page 29-

"*The impact of the water billing exit on Customer Service OM&A includes a $3.6MM annual OM&A cost pressure beginning in 2026 related to the Hamilton contract as mentioned above. This is partially offset by a $1.2MM reduction in costs in 2027 with the exit of Guelph, followed by a further $2.3MM decrease in costs 2029 when Markham and Vaughan exit.*

Departure from water billing will allow the Customer Service Program to strengthen its focus on delivering efficient and compliant electricity services in an increasingly complex regulatory environment, while improving the overall customer experience. This will enable Alectra Utilities to streamline operations, including the elimination of 15 redundant positions. These eliminated positions are included in the projected FTE requirements described in the above sections."

a) Please provide a description of the services being discussed above and the total number of FTEs currently employed to provide these services

b) Please explain who the 1.2MM and 2.3MM cost reductions were estimated.

c) Please explain how the exit periods are being determined (2027 and 2029) and clarify in which month of the year the services cease to be offered.

d) Please explain why there is $3.6MM "cost pressure" and why any redundancies caused by the elimination of outside billing services cannot achieved in the shorter term.

4.0 -VECC -54

Reference: Exhibit 4, Tab 2, Schedule 7

Table 4-2-48: Breakdown of Internal Agents and Third Party Agents

	2024	2025	2026	2027	2028	2029	2030	2031
Internal Agents	29	59	59	58	60	69	73	78
Third Party Agents	52	61	58	64	62	59	62	57
Total Agents	1	120	117	122	122	128	137	135
% Internal Agents	36%	49%	50%	48%	49%	54%	54%	58%

Table 4-2-57: Customer Service Representative Requirements

	2024	2025	2026	2027	2028	2029	2030	2031
Internal Agents	29	59	59	58	60	69	73	78
Third Party Agents	52	61	58	64	62	59	62	57
Third Party Budget OM&A ($)		3,507,220	3,832,274	4,346,209	4,376,181	4,334,620	4,704,717	4,513,671
% Internal Agents	36%	49%	50%	48%	49%	54%	54%	58%

a) Please provide a version of these tables which:
   i. Cover the 2017 to 2023 period;
   ii. Include a row for the total compensation costs (salary and benefits) for the internal agents; and separately,
   iii. Total cost for third party service for the third party agent services.

b) Who provides the third party services? Where are the third party services located and do the third party services uses any facilities of Alectra?

4.0 -VECC -55

Reference: Exhibit 4, Tab 2, Schedule 13

Table 4-2-91: Complement of the Network Metering Department

	Historic Period							
	2017	2018	2019	2020	2021	2022	2023	2024
Field Services	48.0	48.0	48.0	52.0	51.0	48.1	49.0	48.0
AMI Operations	14.0	15.0	13.0	13.0	13.0	15.0	15.0	16.0
Non-Union Specialists	7.0	6.0	10.0	10.0	10.0	11.0	11.0	11.0
AMI Renewal Project Team								4.0
Students		4.3	4.3	4.3	4.3	4.3	4.3	4.3
Temporary Positions						4.0	0.2	1.0

Leaders	11.0	10.0	11.0	12.0	12.0	13.0	13.0	12.5
Total	80.0	83.3	86.3	91.3	90.3	95.4	92.5	96.8
Bridge and Forecast Period								
	2025	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	
Field Services	49.0	49.0	49.5	50.0	49.0	49.0	49.0	
AMI Operations	16.0	16.5	16.0	16.0	16.0	16.0	16.0	
Non-Union Specialists	12.0	12.0	12.0	12.0	12.0	12.0	12.0	
AMI Renewal Project Team	6.0	10.0	10.0	11.0	11.0	11.0	11.0	
Students	4.3	4.3	4.3	4.3	4.3	4.3	4.3	
Temporary Positions	1.0	1.0	0.2					
Leaders	13.0	13.0	13.0	13.0	13.0	13.0	13.0	
Total	101.3	105.8	105.0	106.3	105.3	105.3	105.3	

a) The total complement for Network Metering shown in the table above appear to be different than that shown in Table 4-3-2 FTE by Program - Net Metering. Please explain the difference.

b) Please provide a table showing for each year the total complement compensation costs (salary and benefits) and as divided between expensed (OM&A) and capitalized costs.

c) Are the AMI renewal project team employees of Alectra or contract workers? If the former please explain why Alectra is hiring permanent staff to implement a capital program and what function that staff will have after the AMI 2.0 implementation is completed. Specifically, please explain how replacement of meters requires an ongoing increase in FTEs subsequent to their implementation.

4.0 -VECC -56

Reference: Exhibit 4, Tab 4, Schedule 14

Table 4-2-96: Proposed Program Delivery Managed Capital Expenditures Versus Coordinator Resources

	2025	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**
Proposed Net Capital Expenditure ($MM)	233.1	262.5	321.1	380.6	475.5	529.2	610.2
Number of Coordinators	8	10	10	10	10	10	10
Managed Spend per Coordinator ($MM)	29.14	26.25	32.11	38.06	47.55	52.92	61.02

a) The total number of coordinators shown in Table 4-2-99 appear to be different than the total complement for Program Delivery in Table 4-3-2 FTE by Program. Please explain the difference.

b) The table appears to show that the number of coordinators required rose by 2 when the capital budget rises by $29.4M (262.5-233.1). However, as the budget rises by $347.7MM (610.2-262.5) no further increase in coordinators appears to be needed. Please explain how Alectra determined that 2 incremental coordinators was sufficient for the entire rate period.

4.0 -VECC -57

Reference: Exhibit 4, Tab 4, Schedule 1

Table 4-4-2: Summary of the Costs of Shared Services Provided by and Received by Alectra Utilities (AUC) to/from Alectra Inc and Alectra Energy Solutions Inc. ($MM)

	Actual							Bridge			Forecast				
Services	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**
AUC to AI	(0.4)	(0.4)	(0.4)	(0.3)	(0.3)	(0.2)	(0.2)	(0.2)	(0.6)	(0.7)	(0.7)	(0.8)	(0.8)	(0.8)	(0.9)
AI to AUC	6.0	5.3	5.7	6.5	6.7	9.6	9.5	10.6	10.9	10.0	11.1	10.9	11.2	11.7	11.7
Subtotal	**5.6**	**4.9**	**5.4**	**6.2**	**6.3**	**9.4**	**9.3**	**10.4**	**10.3**	**9.4**	**10.4**	**10.2**	**10.4**	**10.9**	**10.8**
2017 vs 2027											4.8				
2024 vs 2027											—				
AUC to AES	(1.9)	(1.8)	(1.8)	(1.8)	(1.8)	(2.6)	(2.8)	(2.9)	(3.7)	(3.8)	(4.0)	(4.2)	(4.5)	(4.6)	(4.7)
AES to AUC	0.1	0.1	0.6	0.9	0.8	1.6	1.0	1.1	0.4	0.5	0.5	0.5	0.5	0.6	0.6
Subtotal	**(1.8)**	**(1.7)**	**(1.2)**	**(0.9)**	**(1.0)**	**(1.0)**	**(1.8)**	**(1.8)**	**(3.3)**	**(3.3)**	**(3.5)**	**(3.7)**	**(3.9)**	**(4.0)**	**(4.1)**
2017 vs 2027											(1.7)				
2024 vs 2027											(1.8)				
Net Total	**3.8**	**3.2**	**4.2**	**5.3**	**5.3**	**8.4**	**7.5**	**8.6**	**7.0**	**6.1**	**6.9**	**6.5**	**6.5**	**6.8**	**6.6**

2023		From: Attach 4-9 Appendix 2-N 20251014.XLSX			Amount Allocated
AI	AUC	Board of Directors	Fully allocated-cost	99.10%	1.110
AI	AUC	Digital & Innovation	Fully allocated-cost	99.17%	0.583
AI	AUC	Internal Audit	Fully allocated-cost	96.02%	0.569
AI	AUC	Legal, Strategy & Corporate Secretary	Fully allocated-cost	94.65%	0.786
AI	AUC	People & Transformation	Fully allocated-cost	96.77%	0.860
AI	AUC	Regulatory, Government & Corporate Relations	Fully allocated-cost	98.73%	1.212
AI	AUC	Strategy, ERM & Sustainability	Fully allocated-cost	100.00%	1.126
AI	AUC	Corporate and Financial Stewardship	Fully allocated-cost	87.90%	3.303
TOTAL					**9.550**

2027			From: Attach 4-9 Appendix 2-N 20251014.XLSX			Amount Allocated
AI	AUC		Board of Directors	Fully allocated-cost	99.06%	1.378
AI	AUC		Digital & Innovation	Fully allocated-cost	98.98%	1.285
AI	AUC		Internal Audit	Fully allocated-cost	94.78%	0.443
AI	AUC		Legal, Strategy & Corporate Secretary	Fully allocated-cost	94.51%	0.728
AI	AUC		People & Transformation	Fully allocated-cost	96.94%	0.812
AI	AUC		Regulatory, Government & Corporate Relations	Fully allocated-cost	45.70%	1.234
AI	AUC		Strategy, ERM & Sustainability	Fully allocated-cost	100.00%	1.085
AI	AUC		Corporate and Financial Stewardship	Fully allocated-cost	78.26%	4.167
TOTAL						**11.132**

a) There appear to be differences in the information shown at Table 4-4-2 and that shown at Appendix 2-N. For example, we have extracted from Appendix 2-N the allocated costs from AI to AUC for 2023 and 2027 which appear to show total amounts different than Table 4-4-2 (2023: 9.3 vs 9.55 / 2027 :10.4 vs 11.132). Please explain the differences.

b) For each of the categories shown, other than Board of Directors, for each year 2023 to 2027 please show the number of FTEs allocated from AI to AUC.

c) Please explain what different functions are being undertaken that account for the increase in Corporate and Financial Stewardship in 2027 as compared to 2023.

5.0 COST OF CAPITAL (EXHIBIT 5)

5.0-VECC-58

Reference: Appendix 2OB / Alectra_Attach 1-8_2024…XLSX
Reconciliation between Audited

a) Net Finance costs for 2024 are listed in the Financial Statements as $102M. Appendix 2-OB shows for 2024 interest costs of $79,553,494. A difference of approximately 22.4M. The reconciliation model referred to shows a difference to be explained of $8 million. Please explain the difference.

5.0-VECC-59

Reference: Exhibit 5, Tab 1, Schedule 1, page 2 /Exhibit 1, Attachment 1-10 Morningstar DBRS Credit Rating Report (July 2025)

Table 5-1-2: Rating of Alectra Inc. Debentures

Rating Agency	Commercial Paper	Long-Term Debt
Morningstar DBRS	R-1 (Low)	A Stable Outlook
Fitch	Not rated	A Negative Outlook
Standard & Poor's ("S&P")	Not rated	A - Stable Outlook

"We could downgrade the credit ratings if the Company's key credit metrics weaken to a level that no longer supports the "A" credit rating category (i.e., debt-to-capital above 65% and cash flow-to-debt below 12.5%) for a sustained period."

a) Under the current proposal does Alectra forecast that at any time during the rate period a debt-to-capital ratio will rise above 65% or a cash flow-to-debt fall below 12.5%?

5.0-VECC-60

Reference: Exhibit 5, Tab 1, Schedule 1Exhibit 1, Attachment 1-11 Fitch Credit Rating Report (July 2025)

Table 5-1-2: Rating of Alectra Inc. Debentures

Rating Agency	Commercial Paper	Long-Term Debt
Morningstar DBRS	R-1 (Low)	A Stable Outlook
Fitch	Not rated	A Negative Outlook
Standard & Poor's ("S&P")	Not rated	A - Stable Outlook

"Alectra Inc.'s (Alectra) Negative Outlook reflects Fitch Ratings expectations of funds from operations (FFO) leverage remaining under pressure, including after the expected rate rebasing in 2027, due to significantly elevated capital expenditures (capex) plans. Fitch projects leverage to be 6.0x-7.0x through the forecast period, which is well above Fitch's negative sensitivity thresholds. Absent any mitigating measures, such as balanced capital allocation or funding mix, a negative rating action is likely to occur.."

a) Is the proposed capital budget the same or substantially similar to that considered by Fitch when making the above noted observation?

b) At what level of capital spending in 2027-31 would this observation no longer hold true?

5.0-VECC-61

Reference: Exhibit 5, Tab 1, Schedule 1, page 3

Table 5-1-4: Forecasted Long-Term Debt Issues

Description	Issue Date	Term	Principal	Forecast Coupon Rate (%)
$350MM Promissory Note	11/15/2026	10 Years	$350,000,000	4.510%
$400MM Promissory Note	4/1/2027	30 Years	$400,000,000	4.510%
$300MM Promissory Note	4/1/2028	30 Years	$300,000,000	4.510%
$250MM Promissory Note	4/1/2029	30 Years	$250,000,000	4.510%
$200MM Promissory Note	4/1/2030	30 Years	$200,000,000	4.510%
$600MM Promissory Note	4/1/2031	30 Years	$600,000,000	4.510%

a) The Promissory Note principal amounts shown in the table above do not appear to match the similar issuance dated amounts shown in Appendix 2-OB. For example, the $400M issuance of 4/1/2027 is shown in Appendix 2-OB to have a principal amount of $301,369,863. Similar discrepancies can be found in the issuances in 2028 onward. Please explain the differences.

b) All new debt appears to be forecast to be issued on a similar date of 4/1/202x. Why?

c) What is the forecast costs associated with issuance of forecast debt (by tranche). Please explain how this is calculated and what services are performed (and by whom) to justify this cost. Please explain the difference between these costs and those described at Exhibit 4, Tab 2, Schedule 4 under “Finance and Treasury.”

d) Under Alectra’s proposed rate adjustment formula (as explained at Exhibit 1, Tab 11, Schedule 1) does variation from the forecast the cost of new debt issuances during the rate term have any bearing on the calculation of the annual rate adjustment? If so please explain the implications of lower or higher cost debt and lower or higher borrowing principal amounts.

6.0 REVENUE REQUIREMENT (EXHIBIT 6)

6.0-VECC-62

Reference: Exhibit 6, Attachment 6-9, Appendix 2-H

b) Please provide a revised version of Appendix 2-H which: i) excludes the years 2017-2020 but ii) includes 2025 actual known values to date and iii) includes the actuals for 2024 for the same months.

c) Why is there no revenue for USOA #4084 after 2024?

d) Why is there no Interest and Dividend Income (USOA #4405) after 2024?

e) Please provide the calculation of the forecast pole rental revenue (USOA #4210) for the years 2024 to 2031 (i.e., number of poles/attachments and assumed charge per attachment).

f) Please provide a schedule that for each of the years 2024-2031 sets out: i) the actual/forecast billing units for each of the Specific Service Charges in USOA #4235 and iii) the assumed revenue from each of the Specific Service Charges in USOA #4235.

g) Please explain the basis for the 2025-2031 forecast for each of the following accounts: i) #4086; ii) #4225, and iii) #4360.

7.0 COST ALLOCATION (EXHIBIT 7)

7.0-VECC-63

Reference: Cost Allocation Model, Tabs 6.2, 7.1 and 7.2
Exhibit 3, Tab 1, Schedule 4, pages 1 (Table 3-1-4) and 12 (Table 3-1-17)

Exhibit 7, Tab 2, Schedule 1, page 11

a) Please confirm that the customer counts used in Tab 6.2 are based on the average of the 2026 and 2027 year-end values as forecast in Table 3-1-4.

b) Table 3-1-17 indicates that there are Standby customers in the GS>50 class. However, in Tabs 7.1 and 7.2 the number of meters is equivalent to the number of customers and there appears to be no allowance for additional meters associated with the generating units. Please reconcile.

7.0-VECC-64

Reference: Cost Allocation Model, Tab I5.2
Exhibit 7, Tab 2, Schedule 1, page 6 (Table 7-2-5)

a) Please provide the detailed analysis used to develop the Billing and Collecting weighting factors.

7.0-VECC-65

Reference: Exhibit 7, Tab 2, Schedule1, page 9 (Table 7-2-9)

a) Please provide a schedule that sets out the derivation of the Blended Meter Reading Weighting Factors (Table 7-2-9).

7.0-VECC-66

Reference: Exhibit 7, Tab 2, Schedule 3, page 3

Preamble: The Application states:

" *Alectra Utilities proposes a revenue allocation adjustment (decrease) to the GS<50 kW class to bring its RCR within the OEB-approved range at 114.2%, such that the distribution rate for the class result in total bill increases of exactly 10% for the GRZ, and lower than 10% for the remaining legacy rate zones. The net adjustment to this class left a revenue deficiency of $(9,570,394), which was recovered from the Residential class, which will maintain its revenue- to-cost ratio below 100%."*

a) What is the 2027 average customer count and sales (MWh) forecast for the GS<50 customers in each of Alectra's rate zones?

b) If the revenue to cost ratio for the GS<50 class was reduced to 120% what would be: i) the revenue deficiency for the GS<50 class, ii) what would be the GRZ GS<50 distribution rates (based on Alectra's proposed rate design approach) and ii) the total bill impact for the GS<50 customers in each of Alectra's rate zones?

c) What would be the difference in 2027 distribution revenues from GRZ GS<50 customers as between using: i) the GS<50 rates from part (b) above and ii) the GS<50 rates proposed in the Application?

d) Was any consideration given to phasing in the harmonization of the GS<50 rates over two or three years?
   i. If yes, what options were considered and why were they rejected?
   ii. If not, why not?

e) Assuming the GS<50 class RCR was set at 120% and the 2027 GRZ GS<50 rates were set as proposed (i.e., so as limit the total bill impact to 10%), what would be:
   i. The GS<50 rates required for the remaining four rate zones so as to recover the total GS<50 revenue requirement?

ii. The total bill impact for the GS<50 customers in each of the remaining rate zones?

7.0-VECC-67

Reference: Exhibit 7, Tab 2, Schedule 3, page 4

Preamble: The Application states:

"*Alectra Utilities proposes a revenue allocation adjustment (decrease) to the Sentinel Lighting class to bring its RCR to 71.0%. The net adjustment to this class left a revenue deficiency of $(10,338), which was recovered from the Residential class*."

a) What is the 2027 average connections count and sales (kWh & kW) forecast for the Sentinel Lighting customers in each of Alectra's rate zones that currently has a Sentinel Lighting class?

b) What is total bill impact for Sentinel Lighting class (by rate zone) if the RCR is maintained as the status quo (i.e., 83.1%)?

c) Did Alectra consider increasing the Sentinel Lighting RCR in the subsequent years (i.e., post-2027) of its CIR period?
   i. If not, why not?
   ii. If yes, why was this approach rejected?

7.0-VECC-68

Reference: Exhibit 7, Tab 2, Schedule 1, page 10
Cost Allocation Model, Tab 6.1
Exhibit 9, Attachments 9-1 to 9-5, Tab 4 – Billing Determinants

a) Both Exhibit 7 and the Cost Allocation Model indicate that there are customers in the GS>50 and LUDA classes that are Wholesale Market Participants. However, Attachments 9-1 to 9-5 do not show any load associated with Wholesale Market Participants. Please reconcile.

b) For the GS>50, Large Use and LUDA classes the sum of the loads set out in Attachments 9-1 to 9-5 do not appear to match the total load forecast for each class as set out in the Cost Allocation Model. Please review and reconcile.

7.0-VECC-69

Reference: Exhibit 7, Tab 2, Schedule 1, page 15

a) Please confirm that the six customers in the LUDA class are served exclusively by underground facilities (i.e., there are no Alectra-owned overhead facilities used to serve these customers).

b) For both the LUDA and the Embedded Distributor classes how were the costs associated with the dedicated assets used to serve the associated customers determined?

8.0 RATE DESIGN (EXHIBIT 8)

8.0-VECC-70

Reference: Exhibit 8, Tab 1, Schedule 1, pages 5-6 and pages 9-10

a) For those rate zones that currently do not have a Sentinel Lighting rate class, are there no sentinel light installations? If there are, how are they treated for purposes of customer classification?

b) With respect to Table 8-1-2, please provide an alternative version that sets out the distribution bill impact (based only on the monthly service charge and volumetric charge) for each Option by rate zone.

c) With respect to Table 8-1-3, under each option how many customers in the BRZ have rate impacts of 10% or more>

8.0-VECC-71

Reference: Exhibit 8, Tab 1, Schedule 1, page 26

a) Please confirm that there are no Residential customers that own their transformer.

8.0-VECC-72

Reference: Exhibit 8, Tab 1, Schedule 1, page 28

a) With respect to Table 8-1-18, please provide an alternative version that sets out the distribution bill impact (based only on the monthly service charge and volumetric charge) for each legacy customer class by rate zone.

8.0-VECC-73

Reference: Exhibit 8, Tab 2, Schedule 1, page 2

a) Please provide a revised version of Table 8-2-2 that sets out the annual change in the distribution bill by rate class.

8.0-VECC-74

Reference: **Exhibit 8, Tab 2, Schedule 2, page 7**

Preamble: The Application states:

"*Maintaining the current fixed/variable split results in proposed fixed charges for GS<50 kW, GS>50 kW, Large Use and Large Use with Dedicated Assets classes above the calculated ceiling amount in the 2027 Cost Allocation model submitted in this Application as Attachment 7-1. Alectra Utilities proposes increases in fixed service charges above the ceiling charges, where appropriate, given that all rate classes are transitioning to fully harmonized rates concurrent with implementation of the 2027 base revenue requirement in rates*."

a) Please explain why Alectra considers it "appropriate" to propose fixed service charges above the ceiling charges for each of the GS<50 kW, GS>50 kW, Large Use and Large Use with Dedicated Assets classes.

8.0-VECC-75

Reference: **Exhibit 8, Tab 2, Schedule 2, pages 17-18**

Preamble: The Application states:

"*For the purpose of establishing standby billing determinants, the standby customer and Alectra Utilities will enter into an agreement establishing a contract demand amount per month, which takes into consideration the size of the customer's generating unit(s). Standby customers can request a specific amount of contract demand, which Alectra Utilities can then reasonably adjust as warranted, as determined through its engineering and billing data analyses. Where the customer's distribution demand billing determinants fall below that contract demand in a given month, standby charges will be billed on the basis of the difference between the customer's agreed upon contract demand, and their distribution demand in that month. This difference will establish the billing determinant for the month, which will be applied against the demand charge applicable to the standby customer's standard rate class*."

a) How is the Standby customer billed if the customer's monthly demand billing determinant exceeds the agreed upon contract demand? Is the contract demand subsequently adjusted?

8.0-VECC-76

Reference: Exhibit 8, Tab 2, Schedule 2, page 18

Preamble: The Application states:
"*Residential and general service customers with billed demand of less than 50 kW, customers with generation capacity of less than 50 kW, and emergency backup generator customers are proposed to be exempt from standby charges. Customers with existing gross load billing enabling metering infrastructure may choose to remain on gross load billing*."

a) How will Alectra determine that a customer's generator is an "emergency backup generator"?

b) Will Standby customers that do not currently have gross load billing be able to opt for gross load billing as opposed to establishing a contract demand amount per month?

8.0-VECC-77

Reference: Exhibit 8, Tab 2, Schedule 2, page 18 (Table 8-2-19)
Exhibit 3, Tab 1, Schedule 2, page 1 (Tables 3-1-2 & 3-1-3)
Exhibit 3, Tab 1, Schedule 4, page 12 (Table 3-1-18)

a) Please reconcile the 2027 Total Distribution Billing Units set out in Table 8-2-19 with the MW and MWh 2027 forecast values in Tables 3-1-2 and 3-1-3.

b) Please reconcile the 2027 Standby Power billing quantities set out in Table 8-2-19 with the Standby adjustments in Table 3-1-18,

8.0-VECC-78

Reference: Exhibit 8, Tab 2, Schedule 5, pages 1-2
Exhibit 8, Attachment 8-1, RTSR Workform
Exhibit 3, Attachment 3-1, OEB Appendix 2-IB

a) With respect to the RTSR Workform - Tab 15-2027, what year's billing determinants and RTSR values were used to calculate the Billed Amounts set out in cells H17 - H26 and H35-H44.

   i. Please provide a schedule setting out the billing determinants used for each class and confirm that the values are consistent with those in Appendix 2-IB for the same year.

b) With respect to the RTSR Workform – Tab 15-2027, for those classes where the RTSR billing determinate is kWh please provide a schedule setting out the calculation of the billing determinants values in cells F52-F61 and confirm that the forecast delivered kWhs for each class are consistent with the 2027 values in Appendix 2-IB.

c) With respect to the RTSR Workform – Tab 15-2027, for those classes

where the RTSR billing determinate is kW the values in G52-G61 do not all match the 2027 values in Appendix 2-IB. Please reconcile.

d) Exhibit 8, Tab 2, Schedule 5 indicates that Alectra is proposing to apply RTSR charges to the Embedded Distributor class. However, in the RTSR Workform – Tab 15-2027, the Embedded Distributor class is not assigned a share of the forecast 2027 Billing (see J61 and J77). Please reconcile.

8.0-VECC-79

Reference: Exhibit 8, Tab 2, Schedule 6, page 2
Exhibit 8, Attachment 8-1, RTSR Workform, Tab
Exhibit 3, Attachment 3-1, OEB Appendix 2-IB

a) With respect to the RTSR Workform - Tab 16-2027, please provide a schedule setting out the derivation of the forecast LV Expense ($11,094,754 per cell E30).

b) With respect to the RTSR Workform – Tab 16-2027, for those classes where the LV charge billing determinate is kW the values in G17-G24 do not all match the 2027 values in Appendix 2-IB. Please reconcile.

8.0-VECC-80

Reference: Exhibit 8, Tab 3, Schedule 2, pages 2-4

Preamble: The Application states:

"*Where Alectra Utilities has an approved specific service charge in place at two or more rate zones which is in active use, Alectra Utilities proposes to extend implementation of the charge across all five rate zones. Where the current approved level of charge is not consistent among rate zones, Alectra Utilities proposes to implement a consistent rate across all rate zones. With respect to each charge requiring harmonization across rate zones, Alectra Utilities intends to utilize the standard level of charge indicated in the OEB Handbook for Utility Rate Applications, where applicable*.**"** (emphasis added)

a) Given the emphasized sentence in the Preamble please explain the following:

i. Why the Pulling of post-dated cheques charge is being eliminated when it is currently applied in three rate zones?

ii. Why the Legal Letter charge is being eliminated when it is currently applied in two rate zones?

iii. Why the Special billing service (aggregation) and the Special billing service (submetering charge per meter) are both being retained and applied to all rate zones when they are currently applied in only one rate zone?

iv. Why the Temporary Service - Install and Remove - Overhead – No Transformer charge is being eliminated when it is currently applied in three rate zones?

b) .Given there is no OEB Standard Charge amounts for Special billing service (aggregation) and the Special billing service (submetering charge per meter), why didn't Alectra undertake an analysis as to the actual cost to perform each service?

8.0-VECC-81

Reference: Exhibit 8, Tab 3, Schedule 3, page 2

a) With respect to Table 8-3-8, please explain why:

i. The values for "Wholesale" kWh delivered to distributor (higher value) are not available.

ii. The values for microFIT kWh (and other local generation) supplied to distributor are not available.

DEFERRAL AND VARIANCE ACCOUNTS (EXHIBIT 9)

9.0 –VECC -82

Reference: Exhibit 9, Tab 3, Schedule 3

a) Is it Alectra's proposal to dispose of Account 1508 OEB Cost Assessment on a forecast basis for 2025 and 2026?

b) Presumably the OEB ceased issuing cost assessments to utilities that had amalgamated with Alectra and instead issue invoices to the amalgamated utility. Is this correct? If so how did Alectra allocate the combined OEB invoice to the separate former utility franchise rate zones (RZ).

c) For each RZ and each year, please show the formula that was used to arrive at the actual assessment cost and the amount that was implied to be in rates. Please show any escalation in rates related to IRM or other OEB approved rate adjustments.

9.0 –VECC -83

Reference: Exhibit 9, Tab 3, Schedule 8, page 3-4

Table 9-3-17: Account 1508 Sub-account - Impact of Post-merger Capitalization Policy Change($MM)

	Actual							Forecast			
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	Total
HRZ	—	(1.0)	1.0	(6.3)	(5.8)	(6.3)	(6.1)	(5.0)	(5.0)	(8.0)	(42.6)
Carrying Charges	—	—	—	—	—	—	—	—	—	—	—
Total Proposed for Disposition	**—**	**(1.0)**	**1.0**	**(6.3)**	**(5.8)**	**(6.3)**	**(6.1)**	**(5.0)**	**(5.0)**	**(8.0)**	**(42.6)**
BRZ	1.2	1.7	2.2	2.1	3.0	2.4	2.5	2.9	3.2	4.6	25.8
Carrying Charges	—	—	—	—	—	—	—	—	—	—	—
Total Proposed for Disposition	**1.2**	**1.7**	**2.2**	**2.1**	**3.0**	**2.4**	**2.5**	**2.9**	**3.2**	**4.6**	**25.8**
ERZ	—	(1.9)	(2.9)	(1.3)	(1.4)	(0.9)	(1.2)	(1.7)	(1.4)	(2.5)	(15.3)
Carrying Charges	—	—	—	—	—	—	—	—	—	—	—
Total Proposed for Disposition	**—**	**(1.9)**	**(2.9)**	**(1.3)**	**(1.4)**	**(0.9)**	**(1.2)**	**(1.7)**	**(1.4)**	**(2.5)**	**(15.3)**
GRZ	—	—	—	(0.7)	(1.0)	0.5	(0.5)	(0.6)	(0.4)	(0.5)	(3.2)
Carrying Charges	—	—	—	—	—	—	—	—	—	—	—
Total Proposed for Disposition	**—**	**—**	**—**	**(0.7)**	**(1.0)**	**0.5**	**(0.5)**	**(0.6)**	**(0.4)**	**(0.5)**	**(3.2)**
Alectra Total - Principal Balance	**1.2**	**(1.1)**	**0.2**	**(6.3)**	**(5.1)**	**(4.3)**	**(5.3)**	**(4.4)**	**(3.7)**	**(6.5)**	**(35.2)**
Alectra Total - Carrying Charges	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**
Alectra Total	**1.2**	**(1.1)**	**0.3**	**(6.3)**	**(5.1)**	**(4.3)**	**(5.3)**	**(4.4)**	**(3.7)**	**(6.5)**	**(35.2)**

"The proposed disposition amount includes a rate of return on capital that is earned between the start of the rebasing year and the date that the principal balance is fully amortized (end of the disposition period). Alectra Utilities applied the proposed 2027 weighted average cost of capital of 6.10% to the balance recorded in this deferral account."

a) Is the above narrative the reason that the balances in this account does not

attract carrying charges? If not then please explain why carrying charges are not applied. If yes, please show the dollar difference between the method applied and if the Board approved rates for carrying charges were applied instead.

9.0 –VECC -84

Reference: Exhibit 9, Tab 3, Schedule 16

a) What in-house IT systems did the Human Capital Management System (HCM) replace?

b) What were the functions of the in-house IT system that HCM replaced and what are the functions of HCM? Specifically which functions are incremental in the new system.

c) What specific costs were reduced by implementing HCM?

EOF