



Ontario
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BY EMAIL

February 2, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ritchie Murray:

Re: EB-2025-0265 Non-Wires Solutions Program – GrandBridge Energy Inc.

In accordance with Procedural Order No. 1, please find attached the Ontario Energy Board (OEB) staff interrogatories in the above proceeding. The applicant and intervenors have been copied on this filing.

GrandBridge Energy Inc.'s responses to interrogatories are due by February 17, 2026.

Any questions relating to this letter should be directed to Michael Bell at michael.bell@oeb.ca or at 416-440-7688. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Michael Bell
Sr. Advisor, Application Policy & Conservation

Encl.

**OEB Staff Interrogatories
GrandBridge Energy Inc.
EB-2025-0265**

Please note, GrandBridge Energy Inc. (GBE) is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

OEB Staff-1

References:

- (i) EB-2025-0265 Application & Evidence, Pages 10 and 23

Preamble:

Table 1: NWS Program Funding Request has a Total NWS Revenue Requirement of \$2,119,000 and Table 9: GBE NWS Program Budget has a total NWS Program Cost of \$2,363,000.

Questions:

- (a) Please confirm the amounts, by year, for which GBE is seeking OEB approval.
- (b) Please reconcile the differences in both tables.

OEB Staff-2

References:

- (i) EB-2025-0265 Application & Evidence, Page 5

Preamble:

Page 5 states the following:

GBE requests that the OEB make its Final Rate Order effective May 1, 2026. If the OEB does not expect that the Final Rate Order will be issued by such date, the Applicant requests that the OEB approve the recovery of any differences in the NWS Program revenue between the effective date and the implementation date of the OEB's Decision and Order establishing final rates and charges.

Questions:

- (a) If approval by the OEB is not granted in time for implementation for May 1, 2026 rates, please confirm if GBE requires any additional revenue approvals in the Decision and Order.
- (b) If approval by the OEB is not granted in time, will the proposed NWS program design and implementation plan be affected? If yes, please describe how, and potential contingency measures, if known.

OEB Staff-3

References:

- (i) EB-2025-0265 Application & Evidence, Page 9

Preamble:

Page 9 states the following:

The IESO's urgent directive, as outlined in its September 30, 2025 letter, identifies this project as a near-term priority to enable additional supply capacity and maintain reliability across Cambridge, Kitchener, Brant, and Brantford.

Question:

- (a) Please provide the letter from the IESO to GBE dated September 30, 2025, Re: "Urgent letter re: Transmission projects to supply near-term electricity demand growth in Cambridge, Kitchener, Brant, and Brantford"
- (b) Have there been any recent developments that would affect the priority of this project?

OEB Staff-4

References:

- (i) EB-2025-0265 Application & Evidence, Attachment 1 and Attachment 2

Preamble:

In support of its proposed non-wires solution, GBE filed a distribution system test as part of its benefit-cost analysis. GBE notes that the distribution system test has been applied not as a comparative test between multiple options, but as reasonableness assessment to confirm that the proposed investment delivers net system benefits and is

cost effective. In doing so, the filed benefit-cost analysis has included impact categories that correspond to both the distribution service test and the energy system test.

Questions:

- (a) Please update the filed benefit-cost analysis to include all benefit and cost impact streams that are mandatory in the BCA Framework. Should there be any impact streams that are deemed to have a value of nil, please provide rationale for why that is the case.
- (b) Please explain why GBE included elements of the energy system test (i.e., transmission capacity) in its distribution service test in lieu of completing a full energy system test.
- (c) Please file an updated benefit-cost analysis that excludes all elements that are part of the energy system test, including but not limited to the transmission capacity impact.

OEB Staff-5

References:

- (i) [Benefit-Cost Analysis Framework for Addressing Electricity System Needs](#), Section 3.2.2
- (ii) EB-2025-0265 Application & Evidence, Page 19

Preamble:

The Benefit-Cost Analysis Framework for Addressing Electricity System Needs recognizes that there will be some use-cases where a poles and wires solution is impractical and only an NWS is suitable. In these situations, the Benefit-Cost Analysis Framework for Addressing Electricity System Needs requires electricity distributors to provide the estimated cost of a potential traditional poles and wires option.

GBE has identified a new 75 MVA station (i.e., municipal transmission station #2) as the relevant traditional infrastructure solution that is anticipated to be put into service as early as the spring of 2028.

Question:

- (a) Please provide a full breakdown of the estimated capital and Operating, Maintenance & Administrative (OM&A) costs associated with the construction and operation of the eventual 75 MVA station (i.e., municipal transmission station #2).

- (b) Please comment on the timing for the construction of municipal transmission station #2. Please specifically identify at what point in time it became evident that municipal transmission station #2 was needed, and when planning for its construction began. In the response, please indicate whether there were any specific upstream transmission or downstream distribution impacts that lead to an accelerated need for municipal transmission station #2.
- (c) Please confirm whether the capacity of municipal transmission station #2 will be sufficient to allow the proposed NWS program to be wound down after commissioning of municipal transmission station #2.

OEB Staff-6

References:

- (i) EB-2025-0265 Application & Evidence, Attachment 2
- (ii) [Benefit-Cost Analysis Framework for Addressing Electricity System Needs](#), Section 3.2.1
- (iii) EB-2025-0232, Decision and Rate Order, January 15, 2026

Preamble:

The Benefit-Cost Analysis Framework for Addressing Electricity System Needs (BCA Framework) specifies three distinct discount rates for different purposes when preparing benefit-cost analyses.

Per the BCA Framework, a real social discount rate of 4% is to be used for discounting cash flows to present value, and an inflation rate of 2% is to be used for conversions between nominal and constant dollars. In addition, an electricity distributor's weighted average cost of capital is to be used in annualizing the revenue requirement associated with lump-sum capital investments. This revenue requirement is then to be discounted at the social discount rate plus inflation when assessing benefits to customers.

Questions:

- (a) Please identify all discount rate values used in the filed benefit-cost analysis, and please explain how each discount rate was used.
- (b) Please confirm whether GBE's use of discount rates in its filed benefit-cost analysis aligns with the requirements of the BCA Framework. As part of the response, please make any necessary updates to the filed benefit-cost analysis to address any deviations from the discount rate requirements of the BCA Framework, should there be any.

- (c) For all benefit and cost impact streams that have been quantified in the filed benefit-cost analysis, please identify whether they are in constant or nominal dollars.
- (d) Please update the filed benefit-cost analysis to reflect the 2026 uniform transmission values specified by the OEB in its Decision and Rate Order.¹

OEB Staff-7

References:

- (i) EB-2025-0265 Application & Evidence, Pages 9-11, 27
- (ii) EB-2025-0265 Application & Evidence, Attachment 1 and Attachment 2

Preamble:

GBE has indicated that it is seeking funding through the federal government's Smart Renewables and Electrification Pathways (SREP) that will offset the ratepayer funding required for the proposed non-wires solution. However, GBE Energy has indicated that it has not yet received final confirmation of funding approval. With the SREP funding, total bill impacts of 0.47% are expected for the typical residential customer in GBE's Energy+ rate zone.

Page 27 states the following:

Concurrent with this Application, GBE applied to Natural Resources Canada's (NRCan) Smart Renewables and Electrification Pathways (SREP) program in Q2 2025 for a funding contribution of approximately \$1.34 million. GBE's NWS Program has been accepted by NRCan and is in the due diligence stage of enrollment. The SREP contribution will be used to offset a portion of the total NWS Program costs.

Questions:

- (a) Please provide any updates on the SREP funding request.
- (b) Is GBE's request for approval of the NWS program from the OEB contingent upon the receipt of SREP funding?
- (c) Please update the filed benefit-cost analysis to reflect the full cost of the proposed non-wires solution (i.e., without the assumption of funding from the federal government's SREP program).

¹ EB-2025-0232

- (d) Should SREP funding not be obtained, what would be the total bill impact on the typical residential customer in GBE's Energy+ rate zone. Please provide this both as a percentage of total bill and the expected dollar amount increase.

OEB Staff-8

References:

- (i) EB-2025-0265 Application & Evidence, Page 11

Preamble:

Page 11 states the following:

The distribution system serving the City of Cambridge faces significant capacity constraints, primarily due to the thermal limitations of HONI's M20D and M21D transmission lines, which are restricted to a combined capacity of 400 MW.

Question:

- (a) Is GBE aware of any measures implemented by Hydro One Networks Inc., or any related discussions, intended to mitigate thermal degradation and address this capacity restriction?

OEB Staff-9

References:

- (i) EB-2025-0265 Application & Evidence, Pages 20-21

Preamble:

Page 20 states the following:

For the 2026 obligation period, GBE plans to launch the NWS Program simultaneously at Preston TS, Galt TS, and MTS#1, addressing the immediate need to unlock capacity across all three stations. The combined target auction capacity for 2026 is up to 5 MW. The program is expected to expand in subsequent years, with a combined target of up to 10 MW by 2027 and reaching a total of 20 MW by 2028 across the three transformer stations.

Questions:

- (a) Please confirm the minimum annual capacity (MW) required for the NWS program in 2026, 2027 and 2028 to meet distribution needs.

- (b) Can procured capacity be increased beyond the expected 20 MW at a later date? If so, are there any implications?
- (c) What is the contingency plan if adequate demand response capacity is not registered? Has GBE received any early indications from customers who plan to participate in the capacity auction?
- (d) What is the contingency plan for meeting capacity needs if registered participants underperform?

OEB Staff-10

References:

- (i) EB-2025-0265 Application & Evidence, Page 15

Preamble:

Page 15 states the following:

GBE is part of the IESO KWCG IRRP working group and region. The most recent KWCG IRRP was completed in 2021 and spoke to specific needs at the Preston TS and MTS#1. The Preston TS was identified as reaching its end-of-life in the 2025 to 2026 period and requiring replacement. The IESO's July 2024 KWCG IRRP Scoping Report identifies this work as being completed in 2027. It is GBE's understanding that the project to replace the transformer at Preston TS is anticipated to be placed into service in 2026. The capacity effect of this project is to increase the Long-Term Rating (LTR) at Preston TS from its current 112.5 MW to the 180 MW presented in Table 3 and relied upon in this Application.

Questions:

- (a) Please file the 2021 Integrated Regional Resource Plan and 2024 Scoping Assessment Outcome Report.
- (b) Throughout the application, GBE indicates that the system and customers require an immediate solution to address the critical capacity constraints. Please provide additional details as to why this capacity gap exists in the first place. Specifically, what caused the accelerated demand drivers, and why did GBE not make traditional capital investments (e.g., accelerate the construction of MTS#2) when it knew a capacity constraint was expected.

OEB Staff-11

References:

- (i) EB-2025-0265 Application & Evidence, Page 22

Preamble:

Page 22 states the following:

Measurement and Verification (M&V): The NWS Program uses a robust M&V process to ensure market integrity, calculating baseline consumption from the 15 highest consumption values over the last 20 business days (up to 35 days prior), adjusted by a variation factor (0.8 to 1.2). This data-driven approach verifies participant performance, supporting forecasts of reliable capacity delivery.

Question:

- (a) Please provide GBE's opinion on filing the M&V reports at GBE's next Cost of Service application.

OEB Staff-12

References:

- (i) EB-2025-0265 Application & Evidence, Page 32
- (ii) [OEB Letter, Innovation-related Proposals in Rate Applications, March 20, 2025](#)

Preamble:

Page 32 states:

In bringing forward the NWS variance accounts for disposition, GBE will provide substantiating evidence to support the disposition of these amounts, including but not limited to program results, actual costs incurred, actual benefits realized, actual revenues collected, and any lessons learned which may benefit other regulated entities in the Province contemplating or engaging in non-wire solution programs.

Question:

- (a) When clearing the NWS variance accounts, GBE indicates that it will provide lessons learned which may benefit other regulated entities in the Province contemplating or engaging in non-wire solution programs. Please provide

examples of potential methods by which GBE could effectively share lessons learned.

OEB Staff-13

References:

- (i) EB-2025-0265 Application & Evidence, Pages 23-24, 27, 31-32

Preamble:

GBE is requesting approval for an incentive associated with its administration of the proposed NWS Program, in accordance with the OEB's NWS Incentive Guidelines and the final Distribution System Code (DSC) section 11 provisions related to the Margin-on-Payment (MoP) incentive. GBE is proposing an incentive rate of 25% of eligible program participant payments costs. The proposal states the incentive is equal to 16% of the net benefits of the NWS Program, as determined using the Distribution System Test in the BCA Framework. GBE also states that \$705,000 in SREP funding will be used to cover a portion of the total program participant payment costs. The application also states that a true-up process for the NWS-PCVA will ensure that any over- or under-recoveries in revenues, expenditures and any approved MoP are addressed appropriately, with adjustments proposed to rate riders or other mechanisms as needed to maintain cost neutrality for customers.

Questions:

- (a) If the MoP incentive is not approved, will GBE's NWS program be affected? If yes, please elaborate on how the NWS program would be affected.
- (b) Please confirm whether program participant payment costs only include payments made to capacity market participants. What proportion of costs (if any) are allocated to GBE's internal program costs?
- (c) What proportion of benefits and costs (if any) for the NWS Program used to determine eligibility for an MoP incentive are allocated to qualitative DST impact categories?
- (d) If the SREP funding request is not approved, please describe how it will impact the MoP and Table 10.
- (e) Please confirm that the true-up for the NWS-PCVA will include adjustments for:
 - (i) Program participant payment costs; and,
 - (ii) The MoP incentive, based on adjustments to program participant payment costs.

OEB Staff-14

References:

- (i) EB-2025-0265 Application & Evidence
- (ii) EB-2025-0024, GrandBridge Energy Inc., Decision and Rate Order, December 12, 2024 (Decision and Rate Order), Pages 14-16

Preamble:

The Decision and Rate Order states the following:

The balance in the LRAMVA is now zero, and no further entries to the LRAMVA are permitted at this time. The LRAMVA may be continued if GrandBridge Energy requests the use of the LRAMVA for an eligible new activity in a future application, which the OEB will consider on a case-by-case basis.

Question:

- (a) Will GBE be applying for a Lost Revenue Adjustment Mechanism Variance Account if the NWS program is approved?

OEB Staff-15

References:

- (i) EB-2025-0265 Application & Evidence, Page 31

Preamble:

Page 31 states the following:

GBE proposes recovery of costs that are as much as 30% in excess of the OEB approved NWS Program Costs in the NWS-PCVA (30% Provision). The 30% Provision is aligned with the OEB's Advanced Capital Module (ACM) policy which balances program execution and customer protection from excessive NWS Program Costs. Specifically, the 30% Provision allows for a modest amount of payments to program participants that are greater than the amount included in the OEB approved NWS Program Costs, while protecting customers by limiting the program payments.

Questions:

- (a) If the 30% provision is approved, please explain if GBE will document the reasons for activating it. If so, please indicate where it will be documented.
- (b) Is GBE proposing requirements related to program performance that must be met in order for any overspending to be eligible for recovery?
- (c) Please explain if there are constraints to the NWS program if a 30% provision is not approved.

OEB Staff-16

References:

- (i) EB-2025-0265 Application & Evidence, page 31

Preamble:

GBE proposes to establish two NWS variance accounts with symmetrical treatment of variances and is seeking approval for a fixed forecast amount to be recovered through NWS rate riders from May 1 2026 to December 31, 2028.

Questions:

- a) Please explain the rationale for proposing a symmetrical NWS variance account rather than an asymmetrical variance account.

OEB Staff-17

References:

- (i) EB-2025-0265 Application & Evidence, page 23

Preamble:

GBE provided a breakdown of these costs in table 9 of the application which is being reproduced below:

Table 9: GBE NWS Program Budget

Cost (\$000's)	2026	2027	2028	Total
Software Licensing & Maintenance	\$50	\$50	\$50	\$150
Professional Consulting	\$230	\$0	\$0	\$230
Allocated Staffing Costs	\$109	\$77	\$77	\$263
Participant Payments	\$326	\$592	\$1,064	\$1,982
Margin on Payment	\$81	\$148	\$266	\$495
Total Operating Costs	\$796	\$867	\$1,457	\$3,120
IT Software Implementation	\$475	\$0	\$0	\$475
Capitalized Professional Services	\$111	\$0	\$0	\$111
Total Capital Costs	\$586	\$0	\$0	\$586
Total NWS Program Cost	\$1,383	\$867	\$1,457	\$3,707
SREP Contribution	\$501	\$314	\$528	\$1,343
Total NWS Program Cost	\$882	\$553	\$929	\$2,363

Questions:

- a) Please describe the process of developing the NWS budgeted costs shown in Table 9. Please also provide key scenarios and assumptions considered in forecasting NWS costs, including circumstances under which actual costs could be higher or lower than the forecasted amount. Please explain how these considerations informed GBE proposal for a symmetrical variance account.
- b) Please provide the details (nature of the costs, vendors and percentage of the capitalized professional services) on the two capital costs in table 9:
IT Software Implementation of \$475k and Capitalized Professional Services of \$111k.
- c) Please confirm how the capital-related revenue requirement of \$342k on Table 1 is calculated for the capital cost of \$586k in Table 9.

OEB Staff-18

References:

- (i) EB-2025-0265 Application & Evidence, page 31
- (ii) EB-2018-0028 Energy+ Inc. 2019 Cost of Service
- (iii) EB-2021-0009 Brantford Power Inc. 2022 Cost of Service

Preamble:

GBE states that its materiality threshold is \$279,000 in this application, “This amount is equal to 0.5% of the combined distribution revenue requirements of GBE’s predecessor utilities, as approved in EB-2018-0028 (Energy+ Inc. 2019 Cost of Service) and EB-2021-0009 (Brantford Power Inc. 2022 Cost of Service)”.

OEB Staff notes that the materiality amounts are \$115,000 and \$175,000 respectively in the above referenced Cost of Service proceedings. The combined total of \$290,000 (i.e., \$115,000 + \$175,000) does not match with the materiality threshold filed.

Question:

- a) Please confirm the correct materiality threshold should be \$290,000 and update the application accordingly if confirmed.

OEB Staff-19

Reference(s):

- (i) EB-2025-0265 Application & Evidence, page 32

Preamble:

In the true-up process, GBE requests the ability to bring forward NWS variance account balances for disposition prior to its next rebasing, at its discretion, through an IRM application.

Questions:

- a) Please Identify the criteria and timing GBE would apply in determining whether and when to seek disposition of NWS variance account balances prior to rebasing (e.g., cadence and materiality consideration, program milestone).

OEB Staff-20

Reference(s):

- (i) EB-2025-0265 Application & Evidence, pages 31-32
- (ii) EB-2025-0265 Application & Evidence, page 45, Attachment 5 - Draft Accounting Order

Preamble:

In the true up process, GBE refers to “the three NWS variance account balances” that it seeks the ability to bring forward for disposition. OEB Staff notes that the Application elsewhere describes the establishment of the NWS Program Costs Variance Account and related carrying charges, but it is unclear how these correspond to the reference to three variance account balances.

Question:

- a) Please reconcile the above statement with the two new NWS variance accounts in the draft accounting order. Please update the relevant evidence as applicable.

OEB Staff-21

Reference(s):

- (i) EB-2025-0265 Application & Evidence, pages 30 and 31
- (ii) EB-2025-0265 Application & Evidence, page 45, Attachment 5 - Draft Accounting Order

Preamble:

The Application notes that NWS Program costs will be recorded net of third-party funding; however, this requirement does not appear in the opening definition of the NWS-PCVA in the Draft Accounting Order.

The Application refers to OM&A, while the Draft Accounting Order uses O&M. The terms are not interchangeable; OM&A includes Administration, which is a material cost category.

Draft accounting order states that: O&M costs eligible for inclusion in the NWS-PCVA include, but are not limited to, software licensing and maintenance, participant payments (professional services, and administrative expenses (“NWS Program Costs”). Any amounts recorded will be net of any third-party funding or recoveries (e.g. federal grants). Capital costs eligible for inclusion include IT software implementation, capitalized professional services and other capitalized expenditures directly attributable to NWS Program implementation.

The sample accounting entry A in the Draft Accounting Order refers to recording the annual difference between actual non wires operational costs and the amounts recovered through the NWS rate rider. The definition of the NWSPCVA, however, includes both operational and capital related revenue requirement amounts.

Questions:

- a) Please confirm that all amounts recorded in the NWS-PCVA will be net of third-party funding or recoveries, including SREP contributions.
- b) Please update the opening definition of the NWS-PCVA in the Draft Accounting Order to explicitly include the requirement that all amounts be recorded net of third party funding as the third bullet point, and refile the updated Draft Accounting Order.
- c) Please confirm whether the NWS-PCVA is intended to capture OM&A (Operations, Maintenance & Administration). If so, please update the Draft Accounting Order to consistently use OM&A. If "O&M" was intentional, please identify which administrative costs are excluded and explain why.
- d) Please confirm that the OM&A costs and capital costs recorded in the variance account will correspond to the cost categories in Table 9 of the evidence. If so, please revise the accounting order to reflect that.
- e) Please expand sample accounting entry A to include the actual capital related revenue requirement amounts, in addition to operational costs, so the entry aligns with the stated scope of the NWS-PCVA.
- f) Please explain which USoAs will GBE record the participants payments and margin on payments?

OEB Staff-22

Reference(s):

- (i) EB-2025-0265 Application & Evidence, Attachment 5 - Draft Accounting Order
- (ii) EB-2023-0195 Toronto Hydro-Electric System Limited (Toronto Hydro) Customer IR, Settlement Proposal, Schedule 10, pages 5-6

Preamble:

The NWS Program is presented as a non-wires alternative intended to address system capacity needs that would otherwise be met through traditional capital investments. Where NWS solutions defer or avoid such capital work, there may be associated reductions in revenue requirement costs (e.g., return, depreciation, and PILs) that would otherwise have been recovered from customers. As a precedent, Toronto Hydro has been approved for an accounting approach that not only tracks variances in NWS operational expenditures but also records an offsetting entry to capture the revenue requirement impacts of avoided or deferred capital expenditures that were incorporated into its capital plan.

Questions:

- a) Please confirm whether GBE proposes to record an offsetting entry for the revenue requirement impact of any avoided or deferred capital investments attributable to the NWS Program.
- b) If not, please explain why such an offset is not needed in GBE's case, given that the NWS Program is presented as an alternative to traditional capacity expansion investments.
- c) Please describe how GBE will demonstrate and quantify that customers benefit from any avoided or deferred capital investments.
- d) If GBE intends to record an avoided/deferred capital offset, please provide a sample journal entry illustrating how the offset would be recorded, including the accounts to be debited and credited. Please also update the draft accounting order.

OEB Staff-23

References:

- (i) EB-2025-0265 Application & Evidence, page 45, Attachment 5 - Draft Accounting Order

Questions:

- a) If any responses to OEB Staff or other interrogatories result in changes, clarifications, or updates to the NWS Program description in the main narrative (including the scope of eligible costs, terminology, or the application of the 30% Provision), please confirm that GBE will file a revised Draft Accounting Order to ensure it fully aligns with the final narrative.

OEB Staff-24

Preamble:

Page 8 states the following:

The NWS is required to address urgent local capacity needs between 2026 and 2028, until a new transformer station (TS), MTS#2, is placed in service, forecast for the Spring of 2028. GBE will reassess the need for the NWS beyond 2028, drawing on experience from the NWS Program's first years.

Questions:

- a) Beyond addressing urgent local capacity needs, has GBE considered any additional and/or enduring grid and consumer benefits associated with the NWS Program?
- b) Please describe how GBE will reassess the need for the NWS program beyond 2028.

OEB Staff-25

Preamble:

Page 41 states the following:

GridS2 is an experienced full-stack developer, proficiency in developing web-based applications. Stack expertise includes MongoDB, Next.JS, React, Node.JS and cloud platforms such as Azure and AWS. GridS2 was involved in developing Toronto Hydro's Local Demand Response Program.

Questions:

- a) Please describe how GBE has leveraged the lessons learned of past NWS programs in Ontario, including Toronto Hydro's Local Demand Response Program, in designing its proposed NWS program.

OEB Staff-26

References:

- (i) EB-2025-0265 Application & Evidence, page 34 (Appendix B - Eligibility Criteria), Attachment 6 - Non-Wires Alternative Program Rulebook

Preamble:

Appendix B of the Non-Wires Alternative Program Rulebook indicate that the program is not open to individual residential customers (page 34, 1b) and that permitted resources eligible for the capacity auction are limited to DR and BTM DER resources of at least 100 kW.

Questions:

- a) Please explain why individual residential customers are excluded from eligibility as capacity auction participants, including via an aggregator.
- b) Please explain why the capacity requirement for eligible participation in the capacity auction is set to at least 100 kW.
- c) Please confirm if front-of-the-meter DERs are permitted resources within the NWS Program. If not, please explain why.

OEB Staff-27

References:

- (i) EB-2025-0265 Application & Evidence, page 20

Preamble:

Table 8 states the known connected distributed generation (DG) assets in GBE's service area as of May 9, 2025.

Table 8: Known Connected Distributed Generation Assets²⁶

	Total Connected DG Capacity (kW)	% that are Dispatchable	Dispatchable Connected DG Capacity (kW)
MTS#1	12,597	38%	4,787
Preston	16,045	74%	11,873
Galt	5,505	34%	1,872
TOTAL	34,147	54%	18,532

Questions:

- a) Please specify if Table 8 stipulates the known connected DG capacity from only permitted resources and eligible capacity auction participants.
- b) Please expand Table 8 to show the total connected DG capacity (kW), count of resources and % that are dispatchable for commercial, industrial and residential customers connected to each station.
- c) Please confirm how much capacity from future DER connections GBE forecasted to meet its 2028 program capacity target.
- d) Please confirm if Table 8 includes the known connected DG capacity from front-of-the-meter DERs. Please specify the dispatchable connected DG capacity from front-of-the-meter DERs at each station.
- e) Please specify the total demand response capacity that GBE forecasts is available at each station.

OEB Staff-28

References:

- (i) EB-2025-0265 Application & Evidence, page 27

Preamble:

Page 27 states the following:

The NWS Program follows a phased implementation approach with three key milestones. The NWS solution implementation is targeted for completion by the end of December 2025, establishing the foundational system capabilities. Following this technical deployment, customer registration activities are scheduled to begin in Q1 2026, allowing participants to enroll in the program.

Question:

- a) Please describe the work GBE undertook to establish the foundational system capabilities.