

**EB-2025-0265**  
**GrandBridge Energy Inc.**

**Interrogatories of Environmental Defence**

Note: We are not aware of an issues list for this proceeding and therefore have not prefaced the interrogatory numbers with an issue number.

**Interrogatory # ED-1**

Reference: Page 10

Question(s):

- a) Please provide an update on the status of the funds requested from the federal government's Smart Renewables and Electrification Pathways (SREP) Program.

**Interrogatory # ED-2**

Reference: Page 20

Question(s):

- a) Please provide tables showing DG capacity by type of DERs (e.g. solar, gas, BESS, etc.) connected to each of the three relevant transformer stations, and the overall total for all stations by type. Please provide separate tables for total connected and dispatchable connected DG.

**Interrogatory # ED-3**

Reference: Page 20

Question(s):

- a) Of the 20 MW of capacity sought, approximately what percent does GrandBridge expect to procure from (i) existing DERs, (ii) new DERs, (iii) non-generating demand response, and (iv) other (if there are other categories, please explain)? We understand that precision is impossible – a best-efforts estimate based on professional judgement is sufficient.
- b) Of the capacity to be procured from existing DERs, please estimate the percentage share by DER type (BESS, gas, etc.)? We understand that precision is impossible – a best-efforts estimate based on professional judgement is sufficient.
- c) Will GrandBridge be utilizing options that achieve peak reduction savings over longer than the relevant three-year period, such as incentivizing the purchase of high-efficiency equipment that will use less electricity at peak times throughout the lifetime of the equipment?

- d) How will GrandBridge decide between NWS options? Please express the decision-making criteria as a formula where possible. Please also explicitly itemize the factors that will *not* be considered (e.g., if applicable, energy or capacity savings beyond three years).

#### **Interrogatory # ED-4**

Reference: Page 20

Question(s):

- a) Please provide the anticipated annual cost of capacity in \$/MW by year.
- b) For the relevant area, please provide the forecast (i) winter peak and (iii) summer peak over each of the next 5 years.
- c) How many customers are connected to the relevant transformer stations. Please provide a breakdown by station, type (e.g. residential, commercial, etc.). Please also provide the peak demand by customer type.
- d) Please provide an estimate of the summer peak demand reductions per household from replacing a standard air conditioner with a high-efficiency cold climate heat pump.
- e) Please express the incentive levels that could be made available for high-efficiency heat pumps within the capacity cost outlined in (a).
- f) Will GrandBridge consider enhanced DSM incentives for heat pumps as a means to lower peak demand (e.g. through aggregators)?

#### **Interrogatory # ED-5**

Reference: Page 20

Question(s):

- a) Please provide a best-efforts estimate of the overall electricity system benefits from the proposed solutions (e.g. avoided capacity/generation costs).
- b) Please confirm that a portion of those overall electricity system benefits would flow to GrandBridge customers.

#### **Interrogatory # ED-6**

Reference: Page 20

Question(s):

- a) What degree of overlap does GrandBridge expect between the local peak for the three constrained transmission stations and the overall bulk system peak?
- b) Will GrandBridge explore working with the IESO to contract the relevant resources in a way to capture and monetize bulk system benefits?

#### **Interrogatory # ED-7**

Reference: Exhibit 1

Question(s): Page 26

- a) Without the NWS, how many prospective customers would experience connection delays, and roughly for how long?
- b) Please estimate the revenue loss from customer connection delays that would otherwise result.

### **Interrogatory # ED-8**

Reference: Page 33

Question(s):

- a) Please express the bill impacts in terms of the cost to avoid likely outages that would occur but for the proposed solutions. For instance, a residential customer would pay \$21.6 over three years to avoid X outages, with the longest likely being Y minutes.

### **Interrogatory # ED-9**

Reference: Page 34

Question(s):

- a) Seeing as this is a non-discretionary project, is it necessary for the cost-benefit analysis to be positive? Please explain, with reference to relevant OEB guidance documents.
- b) Do all nondiscretionary infrastructure projects pass the DST (i.e. the distribution system cost test)?
- c) Do all of the relevant OEB guidance documents fully address the scenario where the non-wires solution is non-discretionary?

### **Interrogatory # ED-10**

Reference: Attachment 6

Question(s):

- a) Please describe how each of the elements of the procurement / remuneration structure will apply to a solution that will provide guaranteed/firm peak demand reductions but will not be callable/dispatchable (e.g. equipment efficiency improvements that will consistently reduce system peak, but will always provide those savings, versus one that will be “turned on and off”).
- b) Please provide hypothetical examples of how the procurement / remuneration structures will work for (i) an aggregator that achieves peak demand reductions across many residential

customers through efficiency and (ii) a commercial customer that achieves reductions via more efficient equipment.

- c) If the procurement / remuneration structure is not structured for DERs of this type, please describe the amendments necessary to fairly consider and remunerate DERs of this type.