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February 24, 2026

**DELIVERED BY EMAIL AND RESS**

Ritchie Murray, Acting Registrar  
Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto ON M4P 1E4

Dear Mr. Murray

**Re: EB-2025-0265 – GrandBridge Energy Inc. Non-Wires Services (“NWS”) Application (the “Application”)**

We are counsel to the applicant, GrandBridge Energy Inc. (the “Applicant” or “GrandBridge Energy”) in this Application. We write with respect to the recent requests by intervenors and Ontario Energy Board (“OEB”) staff to adjust the schedule set out in Procedural Order No. 1 to extend the deadline for their submissions beyond March 3, 2026.

On February 23, 2026, School Energy Coalition (“SEC”), on behalf of the participating intervenors, wrote to request an additional week after OEB staff file their submission, at least. In its letter dated February 24, 2026, OEB staff requested a two-week extension to file their submission.

While GrandBridge Energy appreciates the interest in ensuring thorough submissions in this proceeding, the Applicant respectfully submits that maintaining the existing schedule under Procedural Order No. 1 is important in light of the implications of the requested extensions for the 2026 NWS program implementation timeline.

If the requested extensions were granted, the procedural timeline would be materially extended as follows:

- a) OEB staff submissions: March 17, 2026;
- b) Intervenor submissions: March 24, 2026 (at least);
- c) Applicant reply submission: April 7, 2026;
- d) Decision writing period: June 5, 2026<sup>1</sup>  
(the “Proposed Extended Schedule”).

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<sup>1</sup> OEB Rates Performance Standards, Complex Incentive Rate-setting Mechanism or other stand-alone request, online: <https://www.oeb.ca/applications/how-file-application/performance-standards-processing-applications#rates>.

OEB staff have referenced portions of the Application and GrandBridge Energy’s response to OEB staff interrogatory 2(b) in support of their view that a two-week extension would not negatively impact the NWS program. Respectfully, when viewed in the context of the full implementation timeline, the Proposed Extended Schedule would have material implications for the NWS program and the delivery of anticipated customer benefits.

As set out in the Application, GrandBridge Energy requested that the OEB make its Final Rate Order effective May 1, 2026:

GrandBridge Energy 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.<sup>2</sup>

In response to OEB staff interrogatory 2(b), GrandBridge Energy explained that while the fundamental design of the NWS program would not change if approval was delayed, the implementation would be affected:

**Question**

(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.”

**Response:**

(b) If OEB approval is not granted in time to align with the planned May 1, 2026, implementation, the fundamental design of the NWS Program would not be affected. However, the implementation timeline for initial procurement may be adjusted with the timing of approval.

Potential contingency measures include:

- Aligning participant contracting with the approval effective date. GBE would not make binding commitments or issue capacity payments to participants prior to receiving OEB approval. All communications with potential participants have clearly stated that execution of participant agreements is contingent on OEB approval.
- Deferring the commencement of the initial capacity auction and obligation period until OEB approval is received. For example, if approval is not received in time to support a 2026 obligation

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<sup>2</sup> EB-2025-0265, GrandBridge Energy Inc. 2025 NWS Application (the “Application”), p. 5, online: <https://www.rds.oeb.ca/CMWebDrawer/Record/923576/File/document>

period, GBE may defer the initial auction to 2027. In such circumstances, GBE may reassess and adjust future capacity targets to reflect system needs at that time. [emphasis added]

As confirmed in the 2026 Pre-Auction Report filed with the Application, the planned initial obligation period is June 1 to September 30, 2026 (copy attached as Appendix “A”).<sup>3</sup> As well, a number of critical capacity auction steps must be completed prior to the obligation period, including capacity offer submissions, selection and a contracting period. See below for an excerpt from the 2026 Pre-Auction Report of these dates:

## 1. Relevant Dates

Relevant dates related to the GrandBridge Energy (GBE) GridShare Program *capacity auction* for the 2026 *obligation period* are outlined in Table 1.

Activity	Settlement Period <sup>1</sup>
Registration opens	Jan 12, 2026 00:01 a.m.
Registration closes	March 6, 2026 11:59 p.m.
Capacity offer submission window opens	March 9, 2026 00:01 a.m.
Capacity offer submission window closes	March 11, 2026 11:59 p.m.
Review and selection period	March 12, 2026 - March 31, 2026
Participant notification date	April 6, 2026
Contracting period	April 6, 2026 - May 8, 2026

Table 1: GBE NWA Program Timelines

## 2. Capacity Auction Details

GBE is implementing the GridShare Program at **Preston TS, Galt TS and MTS#1**. Details of the *target auction capacity, obligation period and availability window* for 2026 are set out in Table 2 below.

Transformer Station	Target Auction Capacity	Obligation Period	Availability Window
<b>Preston TS, Galt TS &amp; MTS#1</b>	5 MW	June 1 to Sep 30, 2026 inclusive	11:00:00 a.m. EST to 9:00:00 p.m. EST on <i>business days</i>

Table 2: Target Auction Capacity, Obligation Period and Availability Window

The NWS Program Rulebook provides that GrandBridge Energy shall not issue or execute any participant agreement unless and until the OEB has approved the NWS program and associated funding.<sup>4</sup>

<sup>3</sup> Application, Attachment 6, NWS Program Rules & Agreements, p 127.

<sup>4</sup> Application, Attachment 6, NWS Program Rules & Agreements, p 5.

Under the Proposed Extended Schedule, the GrandBridge Energy would not receive a decision on the Application with sufficient time to complete the critical capacity auction steps, including to issue and execute participant agreements prior to the commencement of the 2026 obligation period. Any reduction or deferral of that obligation period would, in turn, reduce and delay the anticipated customer benefits associated with the NWS program during the 2026 summer peak.

In addition, the Proposed Extended Schedule may have implications for external funding. GrandBridge Energy has been advised by Natural Resources Canada (“NRCan”) that execution of the contribution agreement is contingent on receipt of OEB approval, and that costs incurred prior to execution would be ineligible. A delay in approval therefore creates a risk to NRCan funding for the NWS program.

Finally, while GrandBridge Energy acknowledges that this is a novel application, Procedural Order No. 1 was issued with awareness of that context and the benefit of the GrandBridge Energy’s pre-filed evidence. The discovery process comprised 78 interrogatories, which GrandBridge Energy submits is a relatively modest scope.

For these reasons, GrandBridge Energy respectfully submits that maintaining the existing schedule under Procedural Order No. 1 would best support timely implementation of the NWS program and the realization of customer and distribution system benefits in 2026.

Sincerely,

**BORDEN LADNER GERVAIS LLP**



Zoë Thoms

## Appendix A – 2026 Pre-Auction Report



### NON-WIRES ALTERNATIVE PROGRAM (GridShare) 2026 PRE-AUCTION REPORT

#### 1. Relevant Dates

Relevant dates related to the GrandBridge Energy (GBE) GridShare Program *capacity auction* for the 2026 *obligation period* are outlined in Table 1.

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Table 2: Target Auction Capacity, Obligation Period and Availability Window

The *maximum number of hours per activation* for 2026 is set out in Table 3 below.

Maximum Number of Hours per Activation
<b>4 hours</b>

Table 3: Maximum Number of Hours per Activation

<sup>1</sup> These dates are based on a January 12, 2026, launch date and may change.

### 3. Capacity and Performance Payments

The *capacity auction reference price contracted monthly activations, capacity incentive payment price and emergency activation payment price* for the 2026 *obligation period* are set out in Table 4.

Transformer Station	Capacity Auction Reference Price	Contracted Monthly Activations	Capacity Incentive Payment Price	Emergency Activation Payment Price
<b>Preston TS, Galt TS &amp; MTS#1</b>	\$500/MW-day	2 activations	\$250/MWh	\$500/MWh

Table 4: Capacity and Performance Payments

### 4. Non-Performance Factor

The non-performance factor for the 2026 *obligation period* is a number between 1.0 and 2.0, depending on the month of the year, and accounts for the severity of the grid constraint during a particular month. Values for the non-performance factors are set out in Table 5.

Month	Non-Performance Factor
<b>May</b>	1.0
<b>June</b>	1.5
<b>July</b>	2.0
<b>August</b>	2.0
<b>September</b>	2.0
<b>October</b>	1.0

Table 5: Non-Performance Factor

### 5. Settlement and Payment Timelines

The schedule of the settlement statements and payments for the 2026 *obligation period* is specified in Table 6.

Settlement Period	GBE to issue Settlement Statement by:	GBE to issue Settlement Payment by:
<b>June 1 to June 30, 2026</b>	July 14, 2026	July 31, 2026
<b>Jul 1 to Jul 31, 2026</b>	Aug 14, 2026	Aug 31, 2026
<b>Aug 1 to Aug 31, 2026</b>	Sep 14, 2026	Sep 30, 2026
<b>Sep 1 to Sep 30, 2026</b>	Oct 14, 2026	Oct 30, 2026

Table 6: Settlement Statement & Payment Due Dates