



March 2, 2026

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Acting Registrar

Dear Mr. Murray,

**Re: Alectra Utilities Corporation (“Alectra”)
2027-2031 Custom Rate Application for Electricity Distribution Rates and Charges
Board File No.: EB-2025-0252**

We are counsel to the Distributed Resource Coalition (“DRC”) in the above-noted proceeding. Pursuant to Procedural Order No. 1, please see below DRC’s time estimates and areas of focus for the upcoming Technical Conference, including references to the relevant interrogatory responses.

Panel	Area of Focus	Time Estimate
Panel 1	Distribution System Plan (DSP) and investment and capacity planning, and system capital and OM&A (2-DRC-9 and 1-DRC-10)	30 min
Panel 2	Fleet, facilities, and information technology capital and OM&A, and customer service performance metrics (1-DRC-6 and 1-DRC-7).	20 min

In the interest of procedural efficiency, DRC is prepared to forego seeking clarification at the Technical Conference and instead receive responses to the following clarification questions by way of undertaking, consistent with the approach in other recent OEB electricity rate proceedings, thereby avoiding the need for any time at the Technical Conference.

Interrogatory	IRR	Question
Panel 1		
2-DRC-9-h)	<i>Alectra Utilities is not aware of any customers who have been formally prevented or delayed in installing EV chargers due to capacity constraints... In some cases, customers may elect not to proceed where system upgrades are required; however, Alectra does not maintain records of customer decisions not to apply or proceed.</i>	<ol style="list-style-type: none">1. Please clarify whether Alectra has the technical or administrative capability to track instances where prospective EV charger customers do not proceed due to required system upgrades, and if not, explain why.2. Please identify any barriers that would prevent Alectra from maintaining such records on a going-forward basis, including system limitations, cost, resource requirements, or procedural constraints.

<p>2-DRC-9-i) 2-ED-12</p>	<p><i>With respect to DER connections, Alectra Utilities confirms that there are areas where DER interconnections are constrained. However, the constraints are at the station level. Alectra Utilities understands that the existing DER connection constraints are driven by short-circuit limitations (refer to Response to Interrogatory 2-ED-12-a).</i></p>	<p>1. Please clarify whether Alectra expects the number of customers unable to connect DERs due to short-circuit limitations to increase, decrease, or remain stable over the 2027–2031 period, and explain the basis for that expectation.</p>
<p>1-DRC-10-a)</p>	<p><i>a)-i) Alectra Utilities notes that the detailed NWS Program design (including market rules, eligibility criteria, and procurement documentation) will be finalized following OEB approval of the proposed NWS Program and the establishment of the Non-Wires Solution Deferral Account.</i></p> <p><i>a)-ii) Alectra Utilities intends to treat aggregated portfolios comparably to single-resource bids, provided that the portfolio can meet the same aggregate capacity, reliability, and locational requirements for the applicable station pocket.</i></p>	<p>1. Please confirm whether Alectra intends to file the finalized NWS Program design, including market rules and decision triggers, with the OEB for review prior to implementation.</p> <p>2. Please clarify how Alectra will assess locational deliverability for aggregated portfolios, particularly where resources are dispersed across multiple feeders.</p> <p>3. Please confirm whether aggregated portfolios will be subject to any additional requirements beyond those applied to individual resources and indicated in the interrogatory response (e.g., additional credit, security, or performance assurance requirements).</p>
<p>1-DRC-10-b)</p>	<p><i>b) Successful bids will be awarded contracts, with services scheduled, dispatched, and settled based on verified delivery. All of these activities will be enabled through the Distribution Wholesale Market Preparedness (DWMP) toolsets</i></p>	<p>1. Please clarify whether the DWMP toolset is intended to be fully operational prior to the first NWS procurement cycle and whether any interim processes may affect dispatch certainty or settlement timelines.</p>
<p>Panel 2</p>		
<p>1-DRC-6-e) 1-DRC-6-f)</p>	<p><i>Recruitment outcomes, participation, retention, and customer satisfaction will be assessed by a third-party evaluator. Findings and recommendations will inform future program design considerations.</i></p>	<p>1. Please identify the criteria that Alectra will use to determine whether the pilot results are sufficiently robust to support scaling to a permanent program.</p> <p>2. Please clarify how the pilot’s tracked metrics (e.g., event participation, opt-outs, curtailment duration, estimated energy curtailed) may be translated into concrete future program design parameters, including but not limited to:</p> <ul style="list-style-type: none"> a. expected participation rates and availability assumptions;

		<ul style="list-style-type: none"> b. dispatch frequency and duration limits; and c. incentive or subscription pricing structures.
1-DRC-7-b)	<p><i>Testing protocols are being developed based on program requirements informed by Alectra Utilities' objectives and applicable IESO requirements.</i></p>	<ol style="list-style-type: none"> 1. Please provide additional details regarding the testing protocols being developed, including: <ul style="list-style-type: none"> a. the specific technical and performance parameters that will be tested (e.g., peak demand reduction, response time, interoperability, communications latency); b. the duration and operating conditions under which testing will occur; and c. the criteria that will be used to determine whether a solution has successfully met program requirements. 2. Please confirm whether and how the final testing protocols will be made publicly available, and if not, please explain why not.

Sincerely,



DT Vollmer

c. All parties in EB-2025-0252