



March 5, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Mr. Murray,

RE: Technical Conference Undertakings Questions for Clearspring

The following are the Technical Conference undertaking questions for Clearspring.

TC Question - CCMBC-1

References: Interrogatory response to 1-CCMBC-1; Exhibit 1, Tab 6, Schedule 2, Attachment 1-3, Clearspring Report, Page 16, 6 Table 2 Total Cost Benchmarking Sample

Questions:

- a) How many utilities in your sample are electricity distributors?
- b) How many utilities are electricity transmitters?
- c) How many utilities are gas distributors?
- d) How many utilities are electricity generators?
- e) How many utilities are there with a combination of the above categories?
- f) As far as utility business is concerned, did Clearspring make any adjustments to make utilities in the sample comparable to Alectra?

TC Question - CCMBC - 2

According to the U.S. Energy Information Administration, there are 1,958 publicly owned electric utilities in the US, 812 electric co-operatives but only 168 investor-owned electric utilities.

- a) Why did Clearspring not include any publicly owned utilities in the sample?
- b) Regarding accounting standards, is Clearspring aware that distributors in Ontario are required to follow MIFRS?

- c) Can Clearspring confirm that in the US utilities are required to follow US GAAP?
- d) What are the main differences between MIFRS and USGAAP?
- e) Is the financial data reported to FERC in USGAAP?
- f) Did Clearspring make any adjustments to make the data of US utilities comparable to data of Ontario utilities?

TC Question - CCMBC-3

Using Wisconsin as an example, there are four Wisconsin utilities in the sample: Madison Gas and Electric Company, Wisconsin Electric Power Company, Wisconsin Power and Light Company and Wisconsin Public Service Corporation.

- a) Are they all regulated utilities?
- b) What is the name of the state regulator?
- a) Does the Wisconsin state regulator use the same method of regulation as the OEB? If the answer is no, did Clearspring make any adjustments to make the data of Wisconsin utilities comparable to data for Ontario utilities?
- b) Is Clearspring aware that electricity distributors in Ontario are required by the OEB to follow the OEB Distribution System Code?
- c) Does the Wisconsin regulator have its own distribution system code? Is it the same as the OEB Distribution System Code? If the answer is no, did Clearspring make any adjustments to make the data of Wisconsin utilities comparable to data of Ontario utilities?

Respectfully submitted on behalf of CCMBC.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Parties to the Proceeding