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March 9, 2026

VIA E-MAIL

Ritchie Murray
Acting Registrar
Ontario Energy Board
Toronto, ON

Dear Mr. Ritchie Murray:

**Re: EB-2025-0252 Alectra Utilities Corporation (Alectra)
2027 Rebasing and Custom Application for 2027-2031
Vulnerable Energy Consumer Coalition (VECC) Technical Conference
Written Questions**

Enclosed are VECC's written questions for Alectra's Technical Conference – Panel 4. The questions are divided into two parts. Part A sets out VECC's questions for Itron as requested by Alectra in its letter of February 26, 2026. Part B sets out VECC's written questions for Alectra as noted in its e-mail of March 3, 2026. Please contact me if any clarification is required (bharper.consultant@bell.net).

Yours truly,

A handwritten signature in black ink, appearing to read 'W Harper', is written in a cursive style.

William Harper
Consultant for VECC/PIAC

ALECTRA UTILITES
2027-2031 CIR APPLICATION (EB-2025-0252)
VECC's WRITTEN TECHNICAL CONFERENCE QUESTIONS

A. FOR ITRON

1.0 Reference: SEC 69 b)
Exhibit 3, Attachment 3-2, Tables 1, 7, and 8

Preamble: The response to SEC 69 b) states:
"Alectra Utilities confirms that it re-ran the load forecast, based on the updated historical data up to December 2025 and the most recent Conference Board of Canada economic forecast."

1.1 Please update Tables 1, 7 and 8 in Attachment 3-2 based on the Conference Board of Canada economic forecasts used to re-run the load forecast models in response to SEC 69 b).

2.0 Reference: VECC 21 a), Attachment 4_HRZ Residential Class – Coef Tab

2.1 For the HRZ Residential Customer Count model, the mEcon.Cust_Var variable has a T-stat of 1.75. Does Itron consider this result to be statistically significant and why?

2.2 What is Itron's practice with respect to including variables that are not statistically significant in the models it develops for forecasting purposes?

3.0 Reference: VECC 24 a)

Preamble: For the GS<50 class' BRZ and ERZ customer count models the primary variable used is mEcon.Cust_Var. However for the GS<50 class' HRZ, PRZ and GRZ customer count model the primary variable used is ResCust.Predicted.

3.1 Why were different variables used in the various models?

3.2 Were both variables tested for inclusion in all five models?

4.0 Reference: Exhibit 3, Tab 1, Schedule 4
SEC 69 b)

4.1 Please update Tables 3-1-6 and 3-1-7 based on the updated baseline forecast per SEC 69 b).

5.0 Reference: VECC 31 – Attachment 3, Coef Tab
VECC 33 – Attachment 1, Coef Tab

5.1 Please explain how the LoadLoss-type variables used in Itron's models were constructed.

6.0 Reference: VECC 31 b)

Preamble: The response states:
“Model variables to specifically account for the impact of COVID-19 on electricity sales were used when other explanatory variables used in the model either did not or did not fully account for the change in usage due to COVID-19. In the case of residential models, it was found that the 2020 increase in per capita real personal income had mostly accounted for the corresponding increase in energy usage due to people staying/working from home. Per capita income is used in all residential use per customer models as part of the constructed XHeat, XCool, and XOther SAE variables (please refer to section ii. above)”.
(emphasis added)

- 6.1 Please explain how (i.e., intuitively from a cause and effect perspective) COVID-19 would lead to higher per capita real income. If there was a cause and effect relationship wouldn't it be more reasonable to expect the opposite?
- 6.2 Were COVID-19 related variables (e.g. LoadLoss variables and GMR variables) both explicitly tested for inclusion in the updated (per SEC 69 b)) Residential Average Use models for each of the five rate zones?
 - 6.2.1 If not, why not?
 - 6.2.2 If yes, on basis were they excluded?

**7.0 Reference: Exhibit 3, Attachment 3-2, Appendix C, page 59
VECC 32, Attachment 1, BRZ GS<50 kW Class Sales Model
VECC 32 b)**

Preamble: VECC 32 b) states:
“GMR variables are used to account for the impact of COVID-19 on electricity sales in those cases where other variables used (such as economic projections) either do not or do not fully account for this impact.”

- 7.1 Were COVID-19 related variables (e.g. GMR variables) explicitly tested for inclusion in the updated (per SEC 69 b)) GS<50 sales models for all five rate zones?
 - 7.1.1 If not, why not?
 - 7.1.2 If yes, on basis were they excluded?
- 7.2 Please explain why a GMR variable was included the original BRZ GS<50 model but not in the updated BRZ GS<50 model.

**8.0 Reference: VECC 37 c)
Exhibit 3, Attachment 3-2, page 34**

Preamble: The response to VECC 37 c) states:
“The process for the derivation of demand was as follows:
1. Developed energy by electrification type (com buildings, EV) and rate class.
2. Aggregated energy by class.
3. Converted energy to demand using load factors based on historical relationship between energy and billing demand for each relevant class.”

Attachment 3-2 states:

“Commercial electrification sales are based on system planning’s expected case. System planning provided MW estimates for both new construction and retrofit by rate zone. The MW forecast is translated to energy using an average annual load factor based on an estimated commercial electric heat load factor of 0.20.”

8.1 The response to VECC 37 c) indicates that, for the relevant customer classes, the impact of EVs on billing demand was determined based on the customer class’ load factor. Please confirm that this is the case and, if so, explain why this is a reasonable assumption.

8.1.1 If not confirmed, please explain how the impact of EVs on billing demand was determined.

8.2 With respect to commercial electrification, VECC 37 c) indicates that the MWh impacts were developed first and used to calculate the MW impacts. However, Attachment 3-2 indicates that the MW estimates were developed first and use to calculate the MWh impacts. Please reconcile.

**9.0 Reference: Exhibit 3, Attachment 3-2, pages 31-32
VECC 37 c)**

Government of Canada’s new EV Strategy

<https://www.canada.ca/en/innovation-science-economic-development/news/2026/02/prime-minister-carney-unveils-canadas-new-automotive-strategy-to-protect-jobs-and-position-our-country-as-a-global-leader-in-next-generation-vehicl.html>

Preamble: VECC 37 c) states:
“Alectra Utilities updated the load forecast in response to 3-SEC-69. Please refer to the tables below for 2026-2031 EV and Building Electrification consumption and EV and Building Electrification billed demand based on the results of the updated load forecast. 2025 volumes are included in the historical actuals.”

9.1 Is the only difference between the forecast for incremental EV MWh included in VECC 37 c) - Table 3 and the original forecast in Attachment 3-2 the fact that incremental 2025 volumes are now included in the historical data?

9.1.1 If so, please confirm that the incremental 2025 sales are assumed to be 24 GWh (i.e., the difference between the 1724 GWh for 2031 shown in VECC 37 b) – Table 3 and the 1,748 GWh referenced on page 32 of Attachment 3-2). If not confirmed, please explain why and what the assumed incremental 2025 sales included in the historical data are.

9.1.2 If not, what else accounts for the difference?

9.2 What impact does the Government of Canada's recently announced new EV strategy, which is expected to drive a 75% EV adoption rate by 2035 (as opposed to the 100% adoption by 2035 set out in the previous Electric Vehicle Availability Standard) have on the EV MWh/MW forecast provided in VECC 37 c)?

**10.0 Reference: VECC 39
Exhibit 3, Attachment 3-2, page 36**

Preamble: Attachment 3-2 states:
"Commercial electrification sales are allocated to zones based on the rate zone's relative share of commercial sales and residential electrification sales are allocated based on the zone's share of residential customers."

10.1 Since Alectra's non-residential rate classes include both commercial and industrial customers, how were the commercial sales by rate zone determined?

10.2 How were the commercial electrification sales allocated to the customer rate classes? (Note: As Itron prepared the commercial electrification forecast but the response to VECC 39 c) was provided by Alectra it was not clear which party would be responsible for responding to this question. Please re-direct to Alectra as appropriate.)

11.0 Reference: Staff 161

Preamble: The response states:
"To test whether we have missed additional CDM efficiency gains, we include a trend variable in the initial models. A negative coefficient on the trend variable would indicate that there are additional CDM savings above that captured in the SAE model variables. In every model the trend variable was either statistically insignificant or positive as it was correlated with the XOther variable. There is no indication that the model is missing the impact of CDM."

11.1 Was the described test performed for just the Residential Average Use models or for the sales models for all customer classes?

11.1.1 If just for Residential, please provide the results of a similar test for each of the GS<50, GS>50 Regular and GS>50 Intermediate sales models.

11.2 For those models where the trend variable was positive (including any of the additional models provided in the previous question), were there any instances where the trend variable was statistically significant?

11.2.1 If yes, why wasn't the trend variable retained in the final model used for the load forecast?

11.2.2 If yes, please provide the model (i.e., variable coefficients and related statistics) as well as the resulting 2026-2031 baseline MWh forecast for the customer class.

12.0 Reference: Staff 158

12.1 Please reconcile or explain the following inconsistencies in the Street Lighting rate zone forecast for connection/device count and MWh for the 2026-2031 period:

- For BRZ there is a decrease in the connection count but an increase in the MWh forecast.
- For ERZ there is an increase in the device count but a decrease in the MWh.
- For PRZ there is an increase of more than 3% in devices but less than a 1% increase in MWh.

B. FOR ALECTRA UTILITIES

**13.0 Reference: VECC 40 – Table 1
Exhibit 3, Tab 1, Schedule 4, page 9, Table 3-1-14**

13.1 Table 1 in the response to VECC 40 provides the updated 2026-2031 impact of customer reclassification on the customer counts for the GS<50 and GS>50 customer classes. The response states that “the 2025 actual reclassifications are excluded from the tables because they are already incorporated in the total actual 2025 baseline figures”. However, the 2026-2031 net impacts on the GS<50 and GS>50 customer classes are the same as in the original Application (Table 3-1-14), which included the 2025 reclassifications. Please reconcile and update the response to VECC 40 as required.

**14.0 Reference: VECC 26 b) and 63 a)
VECC 40
Exhibit 3, Tab 1, Schedule 4, page 9, Table 3-1-23
SEC 69 – Updated Appendix 2-IB
Staff 1, Attachments 1-5**

14.1 It is understood that adjustments were made to the GS<50 baseline customer count forecast (per VECC 26 b)) to account for: i) reclassification (per VECC 40 – subject to any corrections) and ii) distributed generation customers (Table 3-1-23). Please provide a schedule that for each of the years 2026-2031 sets out: i) the GS<50 forecast baseline customer count; ii) the GS<50/GS>50 customer reclassification adjustment, iii) the distributed generation reclassification adjustment, and iv) sum of (i) to (iii). If other adjustments were made please include them in the schedule and provide the relevant evidence references.

14.2 Please reconcile sum in (iv) with the values in SEC 69 – Updated Appendix 2-IB.

14.3 It is understood (per VECC 63 a)) that the GS<50 customer counts used the RRWF and the Cost Allocation models are the average of that year and the previous year’s year-end forecast values. Please reconcile the 2027 to 2031 GS<50 customer count values used in the updated RRWFs (per Staff 1) with the results from part 1 of this question.

**15.0 Reference: VECC 26 b)
VECC 40
VECC 42 – Table 1
SEC 75 – Table 3
Exhibit 3, Tab 1, Schedule 4, page 9, Table 3-1-23
SEC 69 – Updated Appendix 2-IB
Staff 1, Attachments 1-5**

15.1 The GS>50 customer count adjustments provided in SEC 75 do not match those set out in VECC 42. Please reconcile.

15.2 It is understood that adjustments were made to the GS>50 baseline customer count forecast (per VECC 26 b)) to account for: i)

reclassification (per VECC 40 – subject to corrections) and ii) large customer additions (SEC 75/VECC 42 – subject to correction per part 1). Please provide a schedule that for each of the years 2026-2031 sets out: i) the GS>50 forecast baseline customer count; ii) the GS<50/GS>50 customer reclassification adjustment, iii) the large customer addition adjustment and iv) sum of (i) to (iii). If other adjustments were made please include them in the schedule and provide the relevant evidence references.

15.3 Please reconcile the sum in (iv) with the values in SEC 69 – Updated Appendix 2-IB.

15.4 It is understood (per VECC 63 a)) that the GS>50 customer counts used the RRWF and the Cost Allocation models are the average of that year and the previous year's year-end forecast values. Please reconcile the 2027 to 2031 GS>50 customer count values used in the updated RRWFs (per Staff 1) with the results from part 1 of this question.

**16.0 Reference: VECC 26 c)
SEC 75 – Table 3**

16.1 The response to VECC 26 c) confirms that the Large Use class' baseline customer count increases by one between 2025 and 2031. Staff 75 identifies additional large loads that increase the Large Use class' customer count. Please explain how Alectra determines whether a new Large Use customer is to be considered an increase in the baseline customer count forecast or is to be included as an additional large load adjustment?

**17.0 Reference: SEC 69 – Updated Appendix 2-IB
Staff 158
VECC 37**

17.1 It is understood that adjustments were made to the Residential baseline MWh forecast (per Staff 158) to account for: i) EVs (per VECC 37) and ii) building electrification (VECC 37). Please provide a schedule that for each of the years 2026-2031 sets out: i) the Residential forecast baseline MWh; ii) the EV adjustment, iii) the building electrification adjustment and iv) sum of (i) to (iii). If other adjustments were made please include them in the schedule and provide the relevant evidence references.

17.2 Please reconcile the sum in (iv) with the values in SEC 69 – Updated Appendix 2-IB.

**18.0 Reference: VECC 40 – Tables 2 and 3
Exhibit 3, Tab 1, Schedule 4, page 9, Table 3-1-14**

18.1 Tables 2 and 3 in the response to VECC 40 provide the 2026-2031 impact of customer reclassification on the customer class MWh and MW (where applicable) for the GS<50 and GS>50 customer classes. The response states that “the 2025 actual reclassifications are excluded from the tables because they are already incorporated in the total actual 2025 baseline figures”. However, the 2026-2031 net MWh and MW impacts on the GS<50 and GS>50 customer classes are the same as in the original

Application (Table 3-1-14), which included the 2025 reclassifications. Please reconcile and update the response to VECC 40 as required.

**19.0 Reference: Staff 158
VECC 40
VECC 37
Exhibit 3, Tab 1, Schedule 4, page 9, Table 3-1-24
SEC 69 – Updated Appendix 2-IB**

19.1 It is understood that adjustments were made to the GS<50 baseline MWh forecast (per Staff 158) to account for: i) reclassification (per VECC 40 – subject to corrections), ii) EV adjustments (per VECC 37); iii) building electrification (per VECC 37) and iv) distributed generation customers (Table 3-1-24). Please provide a schedules that for each of the years 2026-2031 sets out: i) the GS<50 forecast baseline MWh; ii) the GS<50/GS>50 customer reclassification MWh adjustment, iii) the EV MWh adjustment; iv) the building electrification MWh adjustment, v) the distributed generation reclassification MWh adjustment, and vi) sum of (i) to (v). If other adjustments were made please include them in the schedule and provide the relevant evidence references.

19.2 Please reconcile sum in (vi) with the values in SEC 69 – Updated Appendix 2-IB.

**20.0 Reference: Staff 158
VECC 40
VECC 37
SEC 75 – Table 3
Exhibit 3, Tab 1, Schedule 4, page 9, Table 3-1-17
SEC 69 – Updated Appendix 2-IB**

20.1 It is understood that adjustments were made to the GS>50 baseline MWh and MW forecasts (per Staff 158) to account for: i) reclassification (per VECC 40 – subject to corrections), ii) EV adjustments (per VECC 37); iii) building electrification (per VECC 37); iv). Standby adjustments (Table 3-1-17) and v) large load addition (SEC 75 – Table 3). Please provide schedules that for each of the years 2026-2031 sets out for GS>50 MWs and MW respectively: i) the GS>50 forecast baseline ii) the GS<50/GS>50 customer reclassification adjustment, iii) the EV MWh adjustment; iv) the building electrification MWh adjustment, v) the Standby adjustment, vi) the large load adjustment and vii) sum of (i) to (vi). If other adjustments were made please include them in the schedule and provide the relevant evidence references.

20.2 Please reconcile sum in (vii) with the values in SEC 69 – Updated Appendix 2-IB.

**21.0 Reference: CCC 71 c)
SEC 98 b)**

21.1 With respect to SEC 98 b), please explain why the pole count is constant for the years 2025-2029 and the basis for the increase to 139,310 in 2030 and 2031.

22.0 Reference: Staff 212

- 22.1 With respect to USoA 4225, please provide the actual monthly arrears balances for 2024 and 2025.
- 22.2 Please provide the forecast monthly arrears values for 2026-2031, explain how they were derived and how they are then use to forecast late payment revenues.

**23.0 Reference: Staff 212
SEC 98 d)**

- 23.1 With respect to USoA 4355 and 4360, please provide schedules that set out for each of the years 2022-2025: i) the actual values, ii) the one-time adjustments made (with explanations as to why) and iii) the resulting averages used for purposes of forecasting (per Staff 212).
- 23.2 Please provide any adjustments (and supporting explanations) made to the historical averages for purposes of forecasting 2026-2031 values (per SEC 98 d)).

**24.0 Reference: Exhibit 8, Tab 1, Schedule 1, Tables 8-1-6 to 8-1-13
SEC 69 – Updated Appendix 2-IB**

- 24.1 Please update the notional rate derivation provided in Tables 8-1-6 to 8-1-13 using the updated 2026 load forecast and actual 2026 rates.

25.0 Reference: Staff 1 – Attachment 6 (Cost Allocation Model) – Tab I6.1

- 25.1 It is noted that in the updated Cost Allocation model the harmonized 2026 Transformation Ownership Allowances (TOA) for the GS>50 and Large Use classes are unchanged from those in the original Application. Were the notional 2026 TOA's used in the original Application updated based on the updated 2026 load forecast for purposes of Staff 1 – Attachment 6?

**26.0 Reference: Staff 232
Staff 1 – Attachment 6 (Cost Allocation Model) – Tab I3
(BO-ASSETS)**

- 26.1 In Staff 232 the overall customer class weights for billing and collecting are determined by weighting the Billing weights (Column D) and the Collection Weights (Column E) by the proportion of FTE resources for Billing (60.8%) and Collecting (39.2%) respectively. In Tab I3 the total costs for Billing (USoA 5315) and Collecting (USoA 5320) are \$16,663,459 and \$7,368,112 respectively. Why weren't the relative total costs for Billing and Collecting used to weight Columns D and E?

**27.0 Reference: Exhibit 8, Tab 1, Schedule 1, Tables 8-2-12 to 8-2-13
SEC 69 – Updated Appendix 2-IB
Staff 158 a) – Table 1
VECC 26 b)**

27.1 Please provide updated versions of Tables 8-2-12 and 8-2-13 based on the updated BRZ Streetlight forecast (per Staff 158 a) – Table 1) and explain the basis for converting the BRZ Streetlight forecast connections to devices for purposes of updated Table 8-2-13.