



March 17, 2026

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

Dear Mr. Murray,

**RE: EB-2025-0265 GrandBridge Energy NWS Program Application
Argument Submissions of CCMBC**

Attached are the argument submissions of the Coalition of the Concerned Manufacturers and Businesses of Canada (CCMBC) in the EB-2025-0265 GrandBridge Energy NWS Program Application proceeding.

Respectfully submitted on behalf of CCMBC.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Catherine Swift (CCMBC)
Parties to the Proceeding

EB-2025-0265

GrandBridge Energy NWS Program Application

Argument Submissions of CCMBC

March 17, 2026

Executive Summary

GrandBridge Energy Inc. (GrandBridge) filed an application with the Ontario Energy Board on December 1, 2025, seeking approval for funding its non-wires solutions (NWS) program beginning May 1, 2026. GrandBridge proposes to procure 20 MW of capacity through an NWS capacity auction from 2026 to 2028, during which time a traditional infrastructure investment can be planned and constructed.

The Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC) submits that GrandBridge has not provided adequate reasons why the OEB should order ratepayers to fund its NWS program. GrandBridge does not need funding from ratepayers. Its proposed margin on payments (MoP) for the NWS program participants does not meet the requirements of the Distribution System Code (DSC). The NWS program funding proposal is unfair to customers who are not NWS program participants. The NWS program participants will get most of the benefits while other customers bear all of the costs and most of the risks. The benefit cost analysis (BCA) is weak. GrandBridge did not conduct a market survey of potential NWS participants, and the success of its NWS program is uncertain.

The Application and Regulatory Background

OEB Staff provided the background and application in its submission¹. To minimize regulatory costs, CCMBC is not providing its summary of the application and the regulatory background.

Submissions of CCMBC

GrandBridge does not need the money.

GrandBridge achieved a 11.35% return on equity in 2024 far above the OEB approved deemed regulatory return on equity of 8.86%.² It had no difficulty in finding funds to spend \$3.5 million on MTS#2 in 2025.³

¹ OEB Staff Submission, March 10, 2026, pages 1 to 10

² CCMBC-17

³ CCMBC-4

MoP proposal does not meet the requirements of the DSC.

GrandBridge's proposed MoP for NWS program participants does not meet the requirements of the Distribution System Code (DSC). Section 11 of the DSC requires that any MoP application be supported by a completed BCA and DST consistent with the OEB's BCA Framework.⁴ In its submission OEB staff stated its belief the GrandBridge's MoP incentive request does not meet the requirements established under section 11 of the DSC.⁵ CCMBC agrees with OEB Staff.

NWS program funding proposal is unfair to other customers.

GrandBridge originally requested approval for a margin on payments (MoP) of 25%. GrandBridge has now reduced this to 15%.⁶ Although a MoP of 15% is acceptable according to the DSC, CCMBC believes that it is a very high return that the NWS program participants will get for an essentially risk-free investment. The returns of manufacturers and businesses operating in the territory served by GrandBridge will be reduced while the NWS program participants will get a guaranteed 15% return.

The capacity needs were known in July 2024, but GrandBridge did consider them urgent.

The July 2024 Scoping Report identified the capacity needs at Preston TS, MTS#1 and on the 230kV M20D/M21D transmission lines.⁷ Therefore, the needs were recognized in the Scoping Report complete with a process to move forward. There is no evidence that GrandBridge management believed in 2024 that capacity needs were urgent.

Benefit Cost Analysis is Weak.

GrandBridge did not provide a forecast of customer contributions or take customer contributions into account in the benefit cost analysis (BCA).⁸ New load customers may be required to make capital contributions and/or provide expansion deposits in accordance with sections 3.1 and 3.2 of the Distribution System Code and the OEB-approved Conditions of Service. GrandBridge did not include customer contributions in its BCA. Nor did it include Potential SREP funding⁹. Both would have reduced its request for funding from ratepayers.

⁴⁴ DSC Section 11.1, Page 143

⁵ OEB Staff Submission, March 10, 2026, Page 17

⁶ CCMBC-16. OEB Staff-7

⁷ CCMBC-2

⁸ CCMBC-3

⁹ VECC-4a, OEB Staff-7a

According to GrandBridge's BCA the greatest benefit of the NWS proposal is the avoided cost of planned outages¹⁰. Planned outages are completely under the control of GrandBridge's management. A change in planned outages would greatly reduce the need for the NWS program.

The NWS program is only required to meet capacity needs for two years and its rate rider would over-collect in those two years.¹¹ GrandBridge plans to file ICM application in 2028¹² for additional ratepayer funding of capacity needs from then on.

Most of the benefits accrue to the customers who are NWS program participants.¹³ They benefit from reduced RTSR charges¹⁴, and generous capacity payments¹⁵, while other customers bear all of the risks¹⁶. Board Staff in its submission also pointed this out.

*"Because the submitted DST does not align with the OEB's BCA Framework nor demonstrate savings to ratepayers, it cannot be used to establish eligibility for a MoP incentive under the DSC. ... Where a MoP incentive request does not demonstrate that the proposed NWS program is cost-effective and generates savings to customers, there is a risk that the incentive increases cost burdens for ratepayers. Therefore, GrandBridge Energy's MoP incentive request is not supported by OEB staff."*¹⁷

The analysis depends on the value of lost load,¹⁸ but the load forecast is not normalized¹⁹.

NWS did not conduct a market survey.

GrandBridge did not conduct a market survey. Instead, GrandBridge relied on various sources of information and expertise to inform program design and market assumptions²⁰, yet it expects many participants²¹ CCMBC submits that the GrandBridge's approach is less appropriate or reliable than a formal market survey of its own service area because it does not rely on information from GrandBridge's own ratepayers.

¹⁰ CCMBC-5

¹¹ SEC-5

¹² CCMBC-11

¹³ CCMBC-21

¹⁴ SEC-10

¹⁵ CCMBC-15b

¹⁶ CCMBC-18

¹⁷ OEB Staff Submission, March 10, 2026, page 17

¹⁸ CCMBC-20

¹⁹ CCMBC-6

²⁰ CCMBC-14

²¹ CCMBC-15