TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.1

Reference: 1-VECC-7

Amend the response to 1-VECC-7 IR to provide the total costs of consumer engagements.

RESPONSE:

1-VECC-7 has been updated to provide the total costs of consumer engagements.

The costs of all third-party application specific customer engagements and customer satisfaction and communication engagements are provided below.

A. Third-Party Rate Rebasing Customer Engagements, 2020-2025

1. 2023 ICM Customer Engagement
2. 2027 Rebasing Customer Engagement

   Total cost is $654K.

B. Third-Party Customer Satisfaction and Communication Engagements, 2020-2025

1. Annual Electric Utility Customer Satisfaction Surveys - Residential and Small Commercial, conducted by Simul Corporation, UtilityPULSE division.
2. Quarterly Electric Utility Customer Satisfaction Surveys - Residential, conducted by J.D. Power.
3. Annual Electric Utility Customer Satisfaction Surveys – Commercial, conducted by J.D. Power.
4. Annual National Electricity Customer Satisfaction Survey – Residential, conducted by Innovative Research, commissioned by Electricity Canada.

5. Customer Service Excellence Program – Residential and small commercial, conducted by J.D. Power.
6. Public Awareness of Electrical Safety Survey – Residential and commercial, conducted by Simul Corporation, UtilityPULSE division
7. Communication Awareness and Preferences – Residential, conducted by Leger

   Total cost is $710K.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.2

Reference: VECC-63B

Referring to VECC-63B, advise whether any of the eight customers' generation capacity exceeds the threshold for gross load billing under the RTSR rates or whether they are all below the one megawatt limit for non-renewable or two megawatt limit for renewable, and if any are above it, advise as to how they are gross load billed for purposes of the RTSR.

RESPONSE:

Alectra Utilities advises that four of eight customers are Standby Power with generation project capacity exceeding the non-renewable/renewable threshold. However, Alectra Utilities incurs gross load billing of wholesale transmission services by Hydro One only for one (1) of these four customers. Correspondingly, Alectra Utilities applies gross load billing of RTSR Connection charges to this customer and has installed an additional meter to measure gross demand for this purpose only.

The remaining three (3) Standby Power customers with generation project capacity exceeding the thresholds are billed RTSR rates on a net demand basis due to the applicable gross load billing exemptions:

1. Generator project was installed before 1998; or
2. The project encompasses multiple generator units where the capacity of each generator unit is below the 1 MW non-renewable or 2 MW renewable threshold(s).

Alectra Utilities proposes to bill RTSRs on a gross load basis only to customers for whom Alectra Utilities incurs gross load billing of wholesale transmission service costs by Hydro One.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.3

Reference: Exhibit 3, Tab 1, Schedule 4, Table 3-1-23 through 3-1-25

Provide separate schedules for the three adjustments contained in Table 3-1-23 through 3-1-25 and show the sum.

RESPONSE:

The three separate adjustments that correspond to the total adjustments contained in Tables 3-1-23 through 3-1-25 in Exhibit 3, Tab 1, Schedule 4, are provided in Tables 1 to 3, below.

The adjustments contained in the tables below are as follows:

- Adjustment #1: BRZ DGEN customer count and MWh hours added to forecast.
- Adjustment #2: ERZ FIT MWh and MW reclassed from GS>50 to GS<50. In addition, the estimated GRZ FIT MWhs are added to the forecast (currently, fixed charges only for GRZ FIT).
- Adjustment #3: ERZ, GRZ, HRZ, PRZ FIT customer counts added to forecast.

Table 1 - Breakdown of Table 3-1-23: 2025-2031 General Service Customer Count Forecast Adjustment (Year-End)

Adjustment Type	Rate Class	2025	2026	2027	2028	2029	2030	2031
Adjustment #1: BRZ DGEN Customer Count/MWh	GS<50 kW	-	-	131	131	131	131	131
	GS>50 kW, Regular	-	-	-	-	-	-	-
Adjustment #2: ERZ and GRZ MWh/MW	GS<50 kW	-	-	-	-	-	-	-
	GS>50 kW, Regular	-	-	-	-	-	-	-
Adjustment #3: ERZ, GRZ, HRZ, PRZ Customer Count	GS<50 kW	426	426	426	426	426	426	426
	GS>50 kW, Regular	-	-	-	-	-	-	-
Total Adjustments	**GS<50 kW**	**426**	**426**	**557**	**557**	**557**	**557**	**557**
	GS>50 kW, Regular	**-**	**-**	**-**	**-**	**-**	**-**	**-**
	Total	**426**	**426**	**557**	**557**	**557**	**557**	**557**

Table 2 - Breakdown of Table 3-1-24: 2025-2031 General Service Consumption Forecast Adjustment (MWh)

Adjustment Type	Rate Class	2025	2026	2027	2028	2029	2030	2031
Adjustment #1: BRZ DGEN Customer Count/MWh	GS<50 kW	-	-	294	294	294	294	294
	GS>50 kW, Regular	-	-	-	-	-	-	-
Adjustment #2: ERZ and GRZ MWh/MW	GS<50 kW	196	294	294	294	294	294	294
	GS>50 kW, Regular	(145)	(217)	(217)	(217)	(217)	(217)	(217)
Adjustment #3: ERZ, GRZ, HRZ, PRZ Customer Count	GS<50 kW	-	-	-	-	-	-	-
	GS>50 kW, Regular	-	-	-	-	-	-	-
Total Adjustments	**GS<50 kW**	**196**	**294**	**588**	**588**	**588**	**588**	**588**
	GS>50 kW, Regular	**(145)**	**(217)**	**(217)**	**(217)**	**(217)**	**(217)**	**(217)**
	Total	**51**	**76**	**370**	**370**	**370**	**370**	**370**

Table 3 - Breakdown of Table 3-1-25: 2025-2031 General Service Billed Demand Forecast Adjustment (MW)

Adjustment Type	Rate Class	2025	2026	2027	2028	2029	2030	2031
Adjustment #1: BRZ DGEN Customer Count/MWh	GS<50 kW	-	-	-	-	-	-	-
	GS>50 kW, Regular	-	-	-	-	-	-	-
Adjustment #2: ERZ and GRZ MWh/MW	GS<50 kW	-	-	-	-	-	-	-
	GS>50 kW, Regular	(1)	(1)	(1)	(1)	(1)	(1)	(1)
Adjustment #3: ERZ, GRZ, HRZ, PRZ Customer Count	GS<50 kW	-	-	-	-	-	-	-
	GS>50 kW, Regular	-	-	-	-	-	-	-
Total Adjustments	**GS<50 kW**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
	GS>50 kW, Regular	**(1)**	**(1)**	**(1)**	**(1)**	**(1)**	**(1)**	**(1)**
	Total	**(1)**	**(1)**	**(1)**	**(1)**	**(1)**	**(1)**	**(1)**

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.4

Reference: 6-Staff-212 and Appendix 2-H

Explain the basis for the forecast in Appendix 2-H and why there is no year-over-year inflationary or change in volume adjustments and explain why the revenues are constant for 2029 and after but the expenses are increasing every year.

RESPONSE:

With respect to accounts 4375 and 4380, the 2029-2031 amounts relate to billing revenues and expenses for Alectra Utilities-owned renewable solar generation operations. The revenues were held constant because of a fixed fee structure with no price escalation included in the contract terms.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.5

Reference: 7-Staff-231A

Advise whether Alectra has underground conduit that carries both primary and secondary lines, and if so, advise how it is classified.

RESPONSE:

Alectra Utilities clarifies that a single underground conduit cannot have both primary and secondary cables within it - each conduit must contain only one type of cable.

As described in Exhibit 7, Tab 2, Schedule 1, pp. 3-4, Alectra Utilities classified account 1840 (Underground Conduit) to primary (69.5%) and secondary (30.5%) based on an analysis of the physical assets in the field, using Alectra Utilities' Geographic Information System.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.6

Reference: 1-Staff-1, Attachment 7

Recalculate the rates in the cost allocation snapshot at Staff-1, Attachment 7 based on the 2027 billing determinants as opposed to 2026 billing determinants.

RESPONSE:

Table 1 below presents recalculated notional harmonized rates based on 2027 billing determinants as opposed to 2026 billing determinants, as well as a comparison between the two sets of rates.

Table 1 – Notional Harmonized Rates (2027 Biling Determinants vs 2026 Billing Determinants)

	Undertaking (2027 BD)		IRR (2026 BD)		Difference ($)		Difference (%)	
	MFC	Volumetric	MFC	Volumetric	MFC	Volumetric	MFC	Volumetric
	a	*b*	*c*	*d*	*e=a-c*	*f=b-d*	*g=e/c*	*h=f/d*
Residential	$32.57	$0.0000	$32.56	$0.0000	($0.01)	$0.0000	0.0%	0.0%
GS<50 kW	$42.54	$0.0187	$42.55	$0.0187	$0.01	$0.0000	0.0%	0.0%
GS>50 kW, Regular	$261.60	$4.5023	$264.43	$4.4936	$2.83	($0.0087)	1.1%	-0.2%
GS>50 kW, Intermediate	$261.60	$4.5023	$264.43	$4.4936	$2.83	($0.0087)	1.1%	-0.2%
Large Use	$14,741.94	$3.1901	$14,971.02	$3.1961	$229.08	$0.0060	1.5%	0.2%
Large Use with Dedicated Assets	$7,090.86	$0.4185	$7,090.86	$0.4185	$0.00	$0.0000	0.0%	0.0%
Street Lighting	$1.58	$10.9715	$1.57	$10.9939	($0.01)	$0.0224	-0.6%	0.2%
Sentinel Lighting	$6.52	$16.4460	$6.52	$16.4776	$0.00	$0.0316	0.0%	0.2%
Unmetered Scattered Load	$9.27	$0.0217	$9.26	$0.0217	($0.01)	$0.0000	-0.1%	0.0%

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.7

Reference: Exhibit 8, Tab 1, Schedule 1

Confirm and provide a reference to where in the pre-filed evidence Alectra was seeking to have the 2027 interim rates declared final as part of their request for approval in this application.

RESPONSE:

Please refer to Exhibit 8, Tab 2, Schedule 2, page 14, lines 20-22 of the original Application, where Alectra Utilities requested approval for final harmonized standby rates effective January 1, 2027.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION

JT-4.8

Reference: 8-ED-45

For the ST charges that Alectra is billed by Hydro One as a host distributor which then feeds into the LV expense, advise if Alectra is charged on a gross load basis.

RESPONSE:

For the ST charges that Alectra is billed by Hydro One as a host distributor which then feeds into the LV expense, Alectra Utilities is charged on a gross load basis.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO ENERGY PROBE RESEARCH FOUNDATION

JT-4.9

Reference: 9-Staff-267, page 4, Table 2, and 2A-EP-8, and OEB's Accounting Procedures Handbook (APH)

Advise where in the OEB's Accounting Procedures Handbook (APH) it states that 6 percent of the total OM&A costs recorded in the account shall be included in the proposed disposition balance when balances are brought forward.

RESPONSE:

Please refer to the response to JT-4.10.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO ENERGY PROBE RESEARCH FOUNDATION

JT-4.10

Reference: 9-Staff-267, page 4, Table 2, and 2A-EP-8, and OEB's Accounting Procedures Handbook (APH)

Explain how the treatment of the renewable enabling investments work under the provincial regime and produce an understanding in paragraph form of the difference between Distributed Energy Resources and Renewable Generation.

RESPONSE:

Refer to 9-Staff-267, Account 1532 captures the incremental operating, maintenance, amortization, and administrative expenses related to renewable enabling improvements for ERZ.

According to the March 2025 OEB APH Guidance page 8, the Direct Benefit portion of the balance in Account 1532 (i.e., 6% for ERZ) should be included in the EDVAR schedule as part of the Group 2 accounts requested for disposition. O. Reg. 330/09 defines the classes of consumers to which these benefits accrue as those served by a licensed distributor that has incurred costs to make an eligible investment. Accordingly, the direct benefit portion is recovered from all classes of customers served by ERZ.

The socialized portion of the benefit is recovered through the provincial recovery mechanism. O. Reg. 330/09 prescribes the methodology used by the OEB to determine the recoverable amount for any given year. The OEB then takes steps to ensure that all electricity customers in Ontario, not only the ratepayers of the individual distributor, contribute to the costs of investments made to connect renewable generation.

Under this regime, the costs associated with renewable enabling investments are therefore partially borne by the distributor's customers (direct benefit) and across all Ontario electricity customers (provincial benefit).

Alectra Utilities' DSP filed as Exhibit 2A, Tab 1, Schedule 1, Appendix B10 – Customer Connections page 397 states: "Renewable Generation investments are distributed energy resource connections to the distribution system. These investments are required as per the DSC and include connections as part of programs such as the feed-in-tariff (FIT) and micro-FIT. Renewable Generation currently includes biogas facilities, wind generation, solar, co-generation, battery storage, combined heat and power, as well as other evolving technologies."

Alectra Utilities' understanding of DERs is comprehensive and encompasses a broad range of distributed technologies. This includes not only renewable generation, but also resources such as demand response technologies, energy storage, and microgrids.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS

JT-4.11

Reference: 8-ED-39C, Table 2

Confirm whether all of the 11 CHP listed on 8-ED-39c, Table 2 are exclusively single-cycle technology with a secondary steam recovery generator.

RESPONSE:

Alectra does not have information on customer-owned generator system design and process to the level of detail requested and is unable to answer this question.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO ONTARIO ASSOCIATION OF PHYSICAL PLANT ADMINISTRATORS

JT-4.12

Reference: 8-ED-39C, Table 2

Advise what technologies would constitute the generator types listed as "Other" in 8-ED-39c, Table 2, and on a best-efforts basis, expand the table to differentiate customers between standby rates and those who are on a gross load billing basis.

RESPONSE:

Generator types listed as “Other” in 8-ED-39 c) Table 2 include bio-gas, hydrogen, diesel, reciprocating engine, energy from waste, and steam turbine. To avoid disclosing customer-specific information, Alectra Utilities aggregated customer information by categorizing customers with the above-mentioned fuel types as “Other”.

Alectra Utilities has expanded the table to differentiate customers billed on standby rates or on a gross load billing basis in Table 1 below.

Table 1 – Expanded 8-ED-39 c Table 2

Generator Type	Customers			Total Capacity (MW)		
	Standby Rates	GLB	Total	Standby Rates	GLB	Total
Battery Storage	1	10	11	0.5	13.9	14.4
CHP	6	5	11	28.8	15.8	44.6
Co-generation	1	2	3	8.0	6.5	14.5
Natural Gas	19	2	21	30.2	120.5	150.7
Solar	2	4	6	1.4	2.9	4.3
Other	4	6	10	29.1	6.9	36.0
Total	**33**	**29**	**62**	**97.9**	**166.4**	**264.3**

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO POWER WORKERS' UNION

JT-4.13

Reference: 1-Staff-8

Provide an index of references pertaining to the reduction of serious electrical incidents in Alectra's DSP.

RESPONSE:

Please see Alectra's response to undertaking JT-2.22.

TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO BUILDING OWNERS AND MANAGERS ASSOCIATION

JT-4.14

Reference: 3-BOMA-3 and OEB Staff-161

Advise if Alectra has any plan to mitigate the risk of their estimated CDM impact.

RESPONSE:

As described in JT-1.34, future CDM impacts are embedded in the load forecast and cannot be isolated; therefore, Alectra Utilities treats the over/under forecasting CDM risk no differently than risk to economic growth, weather normalization, etc. (re: forecasting error).

Alectra Utilities has no plans to mitigate the CDM risks in its load forecast. This risk will be managed like other load forecasting risks during the rate term. That is, the risk of underestimating CDM will be entirely on the utility to manage. The risk of overestimating CDM will be subject to the proposed ESM, which provides customer protection should the impact place utility’s earnings above 150 bps of the deemed ROE.