

April 7, 2026

BY EMAIL AND FILED VIA RESS

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Dear Mr. Murray:

Re

EB-2022-0325 – Generic Hearing on Uniform Transmission Rates – Phase 2

We write on behalf of Niagara-on-the-Lake Hydro Inc. (NOTL Hydro) and Entegrus Powerlines Inc. (Entegrus). NOTL Hydro and are Entegrus members of the Working Group convened by the OEB in relation to issues in this proceeding.

In the November 27, 2025 Phase 2 Decision and Rate Order for this proceeding, the OEB addressed several issues related to “double-peak billing”. While many of these issues were resolved, two items remained ongoing.

- The OEB agreed with the Working Group that planned and unplanned outages can result in double-peak billing charges and that amounts paid as a result are subject to refund. The OEB recognized that further work is necessary to develop a clear and objective methodology for refund calculations. The OEB directed OEB staff to continue facilitating the Working Group as it considers and propose options to deal with double-peak billing related to unplanned outages.¹
- The OEB further recognized that load transfers between transmission-connected customers and embedded distribution delivery points result in double-peak billing events that affect multiple parties. The OEB asked OEB staff to continue facilitating the Working Group so that it can develop a clear, equitable framework for related refunds.²

The OEB’s directions to continue the Working Group were set out in paragraph 1 of the OEB’s Order:

The OEB directs OEB staff to continue facilitating the Working Group. The Working Group is tasked with developing proposals regarding double-peak billing refunds due to unplanned transmission outages. The Working Group is also tasked with examining options and developing proposal for a mechanism that will enable double-peak billing refunds for embedded Distributors.³

¹ November 27, 2025 Decision and Rate Order, page 6.

² November 27, 2025 Decision and Rate Order, page 8.

³ November 27, 2025 Decision and Rate Order, page 35.

To date, there have been no further meetings of the Working Group, and no direction as to when such meetings will take place.

On March 26, 2026, Chief Commissioner Côté issued a letter indicating that subject to some “implementation matters” to be addressed in a forthcoming decision, the OEB considers the substantive examination of issues identified for this phase of the proceeding to be complete. The subsequent Decision and Rate Order issued on March 31, 2026 confirmed that the proceeding is complete.

Assuming that the OEB’s March 25, 2026 letter and March 31, 2026 Decision and Rate Order were not intended to reverse or cancel or otherwise limit the OEB’s prior direction and Order for the Working Group to continue, we write to request that the OEB (or OEB staff) provide details as to the next steps that will be undertaken to satisfy the OEB’s November 25, 2025 Order for the continued facilitation of the Working Group to address the identified refund issues related to double-peak billing.

Please let us know if you have any questions.

Yours truly,

AIRD & BERLIS LLP



David Stevens

cc: All parties registered in EB-2022-0325