

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
Schedule B to the *Energy Competition Act, 1998*, S.O. 1998,  
c.15;

**AND IN THE MATTER OF** an Application by Elexicon  
Energy Inc. (“Elexicon”) for an Order or Orders approving or  
setting just and reasonable distribution rates and other charges,  
effective January 1, 2027 to December 31, 2031.

**INTERROGATORIES  
ON BEHALF OF THE  
SCHOOL ENERGY COALITION<sup>1</sup>**

**1-SEC-1**

[Ex.1] Please provide a copy of all materials provided to Elexicon’s Board of Directors in seeking approval of the Application and the underlying budgets.

**1-SEC-2**

[Ex.1] Please provide a copy of all budget guidance documents provided to departments for the purposes of developing the test year budgets.

**1-SEC-3**

[Ex.1] For each third-party report filed in this Application:

- a. Please list which reports Elexicon considers as an expert report, pursuant to Rule 13A of the OEB’s Rules of Practice and Procedure.
- b. For each report listed in part (i), please provide a copy of the retainer agreement and all other instructions provided to the expert, ii) a signed OEB Form A, Acknowledgement of Expert Duty.

**1-SEC-4**

Please provide a copy of all third-party benchmarking analyses, studies, reports, and/or similar documents, undertaken for, by, or that include Elexicon, since 2020, that are not already included in this Application, regarding any aspect that directly or indirectly relates to a material aspect of Elexicon’s budget, or aspect of its business.

**1-SEC-5**

[Ex.1] Please provide summaries of all internal audit reports (either undertaken by internal staff or a third-party) conducted since the merger, related to any aspect that directly or indirectly relates to Elexicon’s business, their findings, recommendations, and the status of any actions that have or are to be taken.

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<sup>1</sup> For any interrogatory which asks for revised tables, or information that include 2025, please incorporate 2025 actuals into the response.

### **1-SEC-6**

Please provide a copy of all third-party reviews or assessments of any material aspect of Elexicon's business or processes since 2020.

### **1-SEC-7**

[Ex.1] Please provide a copy of Elexicon Energy's corporate scorecard, for each year since the merger.

### **1-SEC-8**

[Ex.1-2-1, p.21-22] Please provide all underlying calculations used to derive Figures 9 and 10.

### **1-SEC-9**

[Ex.1-2-1, p.25] With respect to Elexicon's three "top-down strategic parameters":

- a. For the purpose of "restor[ing] reliability to historic levels of performance", please explain how historic performance was defined.
- b. Please explain how and why "maintain[ing] a five-year annual average distribution rate impact of less than 10%" was the appropriate bill impact threshold.

### **1-SEC-10**

[Ex.1-2-1, p.25] Please explain how the company changed, if at all, its business or strategic planning as a result of the start of its current CEO in spring 2025.

### **1-SEC-11**

[Ex.1-2-1, p.26] Elexicon discusses the "catch-up of rates at rebasing" as a result of the significant time since its last rebasing. Please provide the 2027 revenue requirement impact and bill impact driven solely by the impact of opening rate base. Please provide all calculations.

### **1-SEC-12**

[Ex.1-2-1, p.28] Elexicon states: "The net impact of the changes made to cost assumptions post-customer engagement had no material impact on rates and the anticipated average annual distribution bill impact, which remained less than 10%, ensuring that the updated plan was delivering the same outcomes as the balanced plan presented to customers at similar cost. As a result, Elexicon finalized its plan reflecting these updated assumptions."

- a. Please provide the specific changes to the cost assumptions, by category, and provide the information on a revenue requirement basis for each year of the plan term.
- b. Please provide the bill impact changes as a result of the changes in cost assumptions.

### **1-SEC-13**

Please update the following with 2025 actuals:

- a. Appendix 2-AA, 2-AB, 2-BA, 2-C
- b. Appendix 2-H
- c. Appendix 2-JA, 2-JB, 2-JC, 2-K

### **1-SEC-14**

[Ex.1-3-1A, Figure 2] Please provide a list of all positions within Elexicon Corporation that provide services to Elexicon.

### **1-SEC-15**

[Ex.1-3-1B, p.2] With respect to the Service Revenue Requirement included in Table 1:

- a. Please confirm the ‘OEB Approved 2020’ amount is in fact not approved, but simply reflects the company’s actual costs each year.
- b. Please provide the actual last approved values for each category of expenditures for each of Elexicon’s predecessor utilities.

### **1-SEC-16**

[Ex.1-4-2] With respect to consolidation:

- a. Please provide a table that shows for each year since 2019, a) the total costs (OM&A and capital), b) savings, and c) net savings as a result of the merger.
- b. Please provide the impact on the ROE for each year between 2019 and 2026, if the merger had not occurred (i.e. excluding costs and savings).
- c. Please provide a table that shows all consolidation-related capital expenditures since 2019 driven by the merger (for example, but not limited to, the need to integrate or consolidate systems as described in EB-2018-0236 DSP, p.212-213). For each, please provide, i) the project/expenditure name, ii) description of the expenditure, iii) in-service date, iv) undepreciated cost at December 31, 2026, and v) forecast undepreciated cost at December 31, 2028.

### **1-SEC-17**

[Ex.1-5-1] For each year between 2027 and 2031, please provide the total distribution revenue and the revenue deficiency, based on a) 2026 base rates, b) 2026 base rates and 2026 ICM riders.

### **1-SEC-18**

[Ex.1-5-1] With respect to the proposed rate framework:

- a. For each year between 2027 and 2031, assuming an OEB inflation factor of 2%, please provide the total distribution revenue collected each year based on the proposed load forecast.
- b. For each year between 2027 and 2031, assuming an OEB inflation factor of 3%, please provide the total distribution revenue collected each year based on the proposed load forecast.

### **1-SEC-19**

[Ex.1-5-1, p.13] With respect to the proposed Custom Revenue Cap Index (CRCI):

- a. Please confirm that if the IPD and Growth Factor were set to zero, the RGF would be increased by the same amount to offset the change.
- b. If (a) is confirmed, please explain the purpose of the IPD and Growth Factor.

### **1-SEC-20**

[Ex.1-5-1, p.13] Please explain what aspects of the rate framework Elexicon considers incentive rate-setting.

### **1-SEC-21**

[Ex.1-5-1, p.20-21] With respect to the DVA Accounts proposed to be included as part of the Rate Framework:

- a. Please provide the 2027 to 2031 in-service additions, by program, that would be the baseline for the Demand Related Work Variance Account.
- b. Please provide the 2027 to 2031 in-service additions, by program, that would be the baseline for the Connection and Cost Recovery Agreement Variance Account.

- c. [Ex.9-4-2, p.28] With respect to the Large Load Revenue Variance Account, for each year between 2027 and 2031, please provide the total revenue forecast with respect to new large load customers.

### **1-SEC-22**

[Ex.1-5-1, p.21] With respect to the New Stations Deferral Account, based on Elexicon's planning and participation in regional planning, please provide details regarding the potential new stations that could be required to be put in-service between 2027 and 2031. Please provide any estimated costs, even if preliminary at this point.

### **1-SEC-23**

[Ex.1-5-1, Appendix A] With respect to the Clearspring, *Econometric Benchmarking and Incentive Regulation Parameter Study for Elexicon Energy's 2027 Custom IR Application Report*:

- a. Was Clearspring asked to provide an opinion on the specific components of Elexicon Energy's proposed rate framework, or simply given the specific components and asked to provide its view on the appropriate numerical factors to be used (i.e. stretch factor, G-Factor, IPD)?
- b. [p.17] Please explain why Clearspring used U.S. distributors as a peer group instead of Ontario utilities.
- c. Please explain any differences in the methodology used for the total cost benchmarking evidence filed in this application, as that filed in EB-2025-0252 (Alectra). If not the same, please detail the differences.
- d. Please explain any differences in the methodology used for the G-Factor or OM&A-Specific IPD evidence filed in this application, as that filed in EB-2025-0252 (Alectra). If not the same, please detail the differences.
- e. Please provide a table that shows the elasticity of cost, for each of OM&A, capital, and total costs, for each of, a) 1% growth in customers, and b) 1% growth in peak demand.
- f. [p.14] Please provide reconciliation between the capital and OM&A costs included in the application for 2025 to 2031, and the costs included for the purpose of benchmarking. Please detail all the specific adjustments made as set in Table 1.
- g. [p.31-32] Please provide the most recent Conference Board of Canada AWE and GDP-IPI forecasts for each year between 2026 and 2031.
- h. [p.31] Please provide the underlying calculations for the percentage of Labour in OM&A calculation for each year between 2027 and 2031. Please provide references to OM&A information included in the Application.
- i. [p.27, 38] Please provide a copy of each of the Handy Whitman North Atlantic Index (adjusted for Canadian dollars) and implicit capital stock index measure, for each year between 2002 and 2025.

### **1-SEC-24**

[Ex.1-5-1, Appendix A] With respect to the Clearspring, *Econometric Benchmarking and Incentive Regulation Parameter Study for Elexicon Energy's 2027 Custom IR Application Report*:

- a. [p.3] Clearspring states that it "has not opined on the appropriate size of the RGF term or the spending needs of the Company." Please confirm that Clearspring did not provide an opinion on the methodology to determine the RGF.
- b. [p.21] Clearspring states that:

“The following equation explains the components of the custom IR formula that Clearspring has studied and concluded are appropriate to escalate allowed revenue during the CIR period.

$$\text{Growth Revenue} = \text{OEB IPI} - X + \text{G Factor} + \text{OM\&A IPD} * \% \text{OM\&A}$$

Please confirm that the above equation does not include an RGF.

- c. [EB-2025-0252, 1-6-2, Attach 1-3, p.3-4] In its evidence in EB-2025-0252 (Alectra), Clearspring stated that the G-Factor “should only be applied to OM&A revenue” and that it was its “understanding that the Company’s proposed Capital Factor already accounts for growth and, therefore, adding a G Factor for capital would be duplicative.” Please reconcile that view with the Elexicon Energy’s proposal in this proceeding to apply it to the entire revenue.

**1-SEC-25**

[Ex.1-5-3] Please provide a copy of the underlying data and tables used to derive the benchmarking in Figures 1 to 10, and Tables 1 to 5 included in this schedule.

**1-SEC-26**

[Ex.1-5-3] Please provide a list of productivity and efficiency initiatives undertaken by Elexicon each year since 2019. For each, please quantify the savings, broken down by capital and OM&A. Please provide all underlying calculations, an explanation of the calculation methodology and any assumptions made.

**1-SEC-27**

[Ex.1-5-3] Please provide a list of productivity and efficiency initiatives planned to be undertaken by Elexicon between 2027 and 2031. For each initiative, please quantify the savings, broken down by capital and OM&A. Please provide all underlying calculations, an explanation of the calculation methodology and any assumptions made.

**2A-SEC-28**

[Ex.2A-1-1, Appendix 2-AB, 2-BA] With respect to CWIP:

- a. Please provide a breakdown of the assets/projects that make up the Construction Work in Progress (“CWIP”) in each year between 2025 and 2031.
- b. SEC has prepared the following table. Please update with 2025 actuals and confirm that it is correct. If not, please correct and update.

	\$M	2025	2026	2027	2028	2029	2030	2031
a	Capex	59.8	77.2	123.3	129.7	149.7	149.0	188.1
b	CWIP	62.5	69.3	126.4	133.7	146.2	167.3	101.1
c	Net change in CWIP	1.1	-6.8	-57.1	-7.3	-12.5	-21.1	66.2
d	Disposals	-2.2	-1.8	-4.7	-2.8	-7.1	-6.8	-7.1
e=a+c+d	Calculated Additions	58.7	68.6	61.5	119.6	130.1	121.1	247.2
f	Gross PPE Open	629.7	680.8	807.6	869.3	988.9	1119	1240.1
g	Gross PPE Close	680.8	723	869.3	988.9	1119	1240.1	1487.4
h=g-f	Additions	51.1	42.2	61.7	119.6	130.1	121.1	247.3

	ICM Gross Close		84.7					
	ICM additions	7.5	26.5					
e-h	Variance	0.1	-0.1	-0.2	0.0	0.0	0.0	0.0

**2A-SEC-29**

[Ex.2A-2-1] Please provide a table that shows the weighted average depreciation rate for in-service additions in a given year, (e.g. the weighted average depreciate rate in 2027 for 2027 in-service additions only), by OEB category, for each year of the plan.

**2A-SEC-30**

[Ex.2A-6-1, p.3] With respect to the Seaton TS, please provide the full calculation for the actual ‘Annual Revenue Requirement’ for each year between 2020 and 2026 included in Table 4.

**2A-SEC-31**

[Ex.2A-6-1, p.1] Please update Elexicon’s request based on the OEB’s decision in EB-2025-0046 in which the OEB approved partial ICM funding of \$6.55 million in capital for the Sandy Beach Station project, a reduction of \$3.25 million from the proposed \$9.70 million and denied ICM funding of \$18.38 million in capital for a new Dual Element Spot Network at the Belleville Transformer Station.

**2A-SEC-32**

[Ex.2A-6-1, Table 3] With respect to the variance for Seaton TS:

- a. Table 3 appears to be incomplete as the totals are not correct as shown in the table below. Please correct Table 3.

Cost	OEB Approved	Actual	Variance
		\$ 3,244,400	\$ 3,244,400
	\$ 1,186,000	\$ 3,841,402	\$ 2,655,402
	\$ 35,626,000	\$ 33,419,576	-\$ 2,206,424
	\$ 2,500,000	\$ 1,454,907	-\$ 1,045,093
Total	\$ 39,312,000	\$ 41,960,285	\$ 2,648,285

- b. Please provide further details on the Hydro One true-up of the Connection and Cost Recovery Agreement between Elexicon and Hydro One, including the original calculation and the true-up calculation.
- c. Please provide the in-service date of the Seaton TS.

**2B-SEC-33**

[Ex.2B] Please provide a table that shows, broken down by OEB category (system access, renewal, service, and general plant) the Applicant’s (or predecessor utilities’) annual internal budgeted amounts for each year since each of Whitby and Veridian’s last rebasing test year.

**2B-SEC-34**

[Ex.2B] Please complete the attached Excel file.

**2B-SEC-35**

[Ex.2B] Please provide revised versions of Appendix 2-AA, on both a capital expenditure and in-service additions basis, that includes not just programs, but all underlying segment/sub-programs on a net basis (i.e. individual programs/segments are shown inclusive of contributions).

**2B-SEC-36**

[Ex.2B, Appendix 2-AA-2-AB; EB-2018-0236 DSP, p.182-215] With respect to Appendix 2-AA and 2-AB:

- a. Please provide revised versions of Appendix 2-AA and 2-AB that include, a) information back to 2014, b) as part of Appendix 2-AB ‘plan’ amount, the planned amounts included in the 2022-2026 DSP.
- b. [EB-2018-0236 DSP, p.184-192] What is the basis of the ‘planned amounts’ included in Tables 5.4-12 to 5.4.15 for each of Whitby and Veridian?

**2B-SEC-37**

[Ex.2B-1-1, p.1] With respect to the number of connections:

- a. Please provide a list, for each year between 2022 and 2025, the number of applications and inquiries over 1 MW indicating the forecasted load in each year (Note: that the customer does not need to be identified).
- b. Please indicate whether the application or inquiry listed above led to connection of load, and if so, what amount of load and in what year.

**2B-SEC-38**

[Ex.2B-1-1, p.2] With respect to the asset condition demographics:

- a. What was the comparable total percentage of assets rated fair, poor and very poor in the previous Distribution System Plan (“DSP”)?
- b. Please file the previous DSP from EB-2018-0236 filed April 26, 2021. (Note: It is sufficient for the Applicant to simply agree to deem the EB-2018-0236 DSP on the record for this proceeding and provide a link to the OEB’s Regulatory Document Search, as opposed to re-filing.)
- c. In a number of the material investment program appendices (2B-4-3), Elexicon has provided a forecast of the asset condition demographics in 2031 with and without the proposed investments. Please explain, in detail, how Elexicon forecast 2031 ACA results.

**2B-SEC-39**

[Ex.2B-1-1, p.4] With respect to the primary operational objectives of restoring reliability to historical levels of performance:

- a. Please provide the five-year average and targets for SAIDI and SAIFI at the time of merger.
- b. Please provide the reference in the merger Application to the information provided in part a.
- c. For each year since the merger up to 2024, please provide the five-year average and targets for SAIDI and SAIFI.

**2B-SEC-40**

[Ex.2B-2-2] With respect to reliability:

- a. For each year between 2020 and 2025, please provide a table that shows each asset type, and its respective failures contribution to SAIDI and SAIFI (excluding MEDs and LOS) (e.g. see Figure 18 and 19 at Exhibit 2B-4-3, Appendix F, p.31-32).
- b. For each year between 2020 and 2025, please provide in a table the SAIDI and SAIFI (excluding LOS and MED), by cause code. Please provide the information for each of the underground and overhead systems.

**2B-SEC-41**

[Ex.2B-2-2, p.7] Please update the following to include, 2017 to 2019 and 2025 actuals information:

- a. Tables 17-19, 22-24
- b. Figures 7-10, 12, 14-25

**2B-SEC-42**

[EB-2018-0236 DSP, Appendix A, A4, p.9] Please provide a revised version of Figure 6 that shows actual forecast residential customer additions by community, for each year between 2020 and 2025, and a forecast for each year between 2026 and 2031.

**2B-SEC-43**

[Ex.2B-3-1, p.20 and Figure 8] With respect to using the High Growth Scenario for determining customer connections:

- a. Please provide historical data which supports Elexicon's forecast that 100% of the projected residential homes will be developed, and 100% of the projected Commercial and Industrial ("C&I") businesses will materialize within the forecast period.
- b. For billing determinants forecasting, what assumption was made with respect to the ratio between planned developments and actual load being added?
- c. Please provide Figure 8 in tabular format.

**2B-SEC-44**

[Ex.2B-3-1, p.20] Please detail the changes to the proposed capital plan that would have occurred if Elexicon had chosen each of the low and medium growth scenarios.

**2B-SEC-45**

[Ex.2B-3-1] At any point as part of the capital planning process, did Elexicon set an overall budget amount or constraints, for the total amount of capital expenditures each year or during the rate term as a whole? If so, please provide details of the budget and how the amount was determined.

**2B-SEC-46**

[Ex.2B-3-1, p.33] With respect to Elexicon's Project Prioritization:

- a. Please provide a copy of the internal document/guide regarding Elexicon's prioritization which, among other things, would include a rubric regarding the evaluation of a project's impact (consequences of failure) and probability assessment (likelihood of failure).
- b. Elexicon describes how it prioritizes projects within the investment categories. Does Elexicon do an overarching prioritization process? If so, please provide the weightings and the results for the 2027-2031 capital plan, including projects that were rejected or delayed.
- c. If prioritization within investment categories is different than the overall prioritization, please provide the weightings used and the results for the 2027-2031 plan, including projects that were rejected or delayed.
- d. If there is no overall prioritization, please explain how it determines which projects to include and not include in the plan depending on the size of the overall budget.

**2B-SEC-47**

[Ex.2B-3-1, p.33-34] Please provide the results of Elexicon's prioritization process in Excel format. The information should include, at a minimum, a) project name, b) cost, c) Criticality Score, d) Impact Score, e) Probability Score, and f) each score for each individual factor, and g) whether the project/program is included in the plan. If different programs/projects include alternatives that were considered as part of this process, please include each alternative.

**2B-SEC-48**

[Ex.2B-3-2, p.45-53, Tables 22-25] For feeders listed in Tables 22-24 please provide: a) the capacity rating, b) the actual loading each year between 2020 and 2025, and the forecasted loading for each year between 2026 and 2031 and c) the remaining capacity for each year. Please provide the information in Excel format.

**2B-SEC-49**

[Ex.2B-3-2, p.65-73, Tables 27-31] For stations shown in Tables 27-31 please provide, a) region, b) the capacity rating, c) the actual loading each year between 2020 and 2025, and the forecasted loading for each year between 2026 and 2031, and d) the remaining capacity for each year. Please provide the information in Excel format.

**2B-SEC-50**

[Ex.2B-3-2, p.55-63, Figures 24-32] With respect to System Peak Load Forecast growth:

- a. Please provide Figures 24-32 in tabular format, including breaking out the various components of the forecast.
- b. Please provide the 2019-2024 actuals shown in Figure 24 P90 Weather Corrected Base.
- c. Please explain how Elexicon divided the customer growth, electrification and electric vehicle growth between stations in each area.
- d. Please detail all differences used in the peak demand forecast methodology used in this application as compared to that used in Elexicon's 2022-2026 DSP.

**2B-SEC-51**

[Ex.2B-3-2, Appendix B] With respect to the BBA, *2025 Asset Condition Assessment Report*:

- a. [p.22] Please provide a revised version of Table 4, removing age as a condition parameter.
- b. For each asset, please provide the average total score and average score for each condition parameter.

**2B-SEC-52**

[Ex.2B-3-2, Appendix B, p.22, Table 4] Please provide a table that shows for all asset types listed in Table 4, the number of replaced assets, regardless of what program, for each year between 2020 and 2025, and forecast for each year between 2026 and 2031.

**2B-SEC-53**

[Ex.2B-4-1, p.3-10] Please update Tables 1-4 with 2025 actuals and provide in Excel format.

**2B-SEC-54**

[Ex.2B-4-1, p.3-4] Please provide a revised version of Table 1 that includes 2027 and 2031 forecast in-service additions.

**2B-SEC-55**

[Ex.2B-4-1, p.3-4, Table 1; Appendix 2-AA] With respect to capital contributions:

- a. Please explain why the actual contributions for System Access were significantly lower than forecasted for 2021-2024 as shown in Table 1.
- b. Please breakout the capital contributions shown for each for System Access into the four reporting areas A1-A4.

**2B-SEC-56**

[Ex.2B-4-3, Appendices] For each program, please provide in a table:

- a. 2025 ACA asset conditions demographics for each asset relevant to the specific program.
- b. 2031 ACA asset conditions demographics for each asset relevant to the specific program, if no investments were made.
- c. For each investment scenario, the 2031 ACA asset conditions demographics for each asset relevant to the specific program.

**2B-SEC-57**

[Ex.2B-4-3, Appendix A] With respect to Externally Initiated Plant Relocation:

- a. [p.5] Please provide a table that shows each relocation project between 2025 and 2031, and the annual net capital expenditures forecast.
- b. For forecast projects in the latter year of the rate term, please explain how Elexicon forecast the costs.

**2B-SEC-58**

[Ex.2B-4-3, Appendix B] With respect to Customer and Generation Connections:

- a. Please provide in detail how Elexicon has forecast customer connection costs. In doing so, please provide all supporting calculations.
- b. [p.23] Please provide a breakdown of Table 12 and 13 into each of load and generation connections.

**2B-SEC-59**

[Ex.2B-4-3, Appendix C] With respect to System Expansion:

- a. [p.3-5] Please explain the relationship between the loads shown in Table 1 and the expected connections shown in Tables 128 and 129 in Exhibit 3-1-1, Appendix A and Table 4 in Exhibit 9-4-2.
- b. [p.3-7] For each of the projects shown in Tables 1 and 2, please indicate the capital contribution and the status of the project (e.g. construction started, agreement signed, etc.).

**2B-SEC-60**

[Ex.2B-4-3, Appendix D, p.1] With respect to Metering and AMI 2.0:

- a. [p.1] Please provide an update of the status of the RFP process for meter reverification and resealing.
- b. [p.21, Table 7] Please explain why the cost of metering over the 2027 to 2031 period does not decrease with the implementation of AMI 2.0 starting in 2028.
- c. Please provide the actual and forecast number of expired meters between 2020 and 2026.
- d. With respect to AMI 2.0:
  - i. [p.24] Please provide further details regarding how specifically Elexicon forecast the cost of AMI 2.0.
  - ii. Please provide a copy of any internal business case for AMI 2.0.
  - iii. [p.29] Please explain why Elexicon did not consider a scenario which extended out further the deployment of AMI 2.0.

**2B-SEC-61**

[Ex.2B-4-3, Appendix E] With respect to Substation Renewal:

- a. [p.31, Table 6] For each project listed in Table 6, please indicate whether spending on the station was included in the previous DSP, and if so, the cost and year of the planned work.

- b. [p.31, Table 6] Please indicate whether the work described in part a. was completed and if not, please explain why.
- c. [p.33] Please provide the priority score for each MS.

#### **2B-SEC-62**

[Ex.2B-4-3, Appendix F] With respect to Underground System Renewal:

- a. [p.22-23] For the period 2020 to 2026, please indicate the amount of underground cable that was planned to be replaced and rejuvenated in each year.
- b. [p.35-36] Please breakdown the costs shown in Table 7 into the assets shown in Table 8.

#### **2B-SEC-63**

[Ex.2B-4-3, Appendix G] With respect to Overhead System Renewal:

- a. [p.43] For the period 2020 to 2026, please indicate the amount of overhead assets that was planned to be replaced in each year.
- b. [p.43] Please breakdown the costs shown in Table 8 into the assets shown in Table 9.
- c. [p.53-54] Please explain why the options analysis only includes two options (balanced and need-based).

#### **2B-SEC-64**

[Ex.2B-4-3, Appendix H, p.25] With respect to Reactive Capital, please provide in detail how Elexicon has forecast the reactive capital budget. In doing so, please provide all supporting calculations.

#### **2B-SEC-65**

[Ex.2B-4-3, Appendix I, p.46-47] With respect to Bradshaw MS:

- a. Please provide further details on the load transfers which were explored and rejected.
- b. Please provide further details on when the mobile station will be used during the 2027-2031 period, and whether it will be available for emergencies.

#### **2B-SEC-66**

[Ex.2B-4-3, Appendix I-1, Tables 1 and 2] With respect to the GTA East TS:

- a. Please provide a copy of the full internal business case (or similar document) for this expenditure.
- b. Please provide an update on the status of the work to date.
- c. [p.9-10] Please confirm that the peak load demand forecasts included in Tables 1 and 2 are based on the High Growth Scenario.
- d. [p.9-10] Please explain what options Elexicon has if the forecasted load growth does not materialize at the expected pace.
- e. [p.13-14] Please explain how Elexicon has forecast the costs of the project and all supporting information with respect to the forecast transmission capital contribution.
- f. Please provide a detailed schedule for the project.

#### **2B-SEC-67**

[Ex.2B-4-3, Appendix L, p.2] Please provide the internal business case for the 2021 Belleville office and operations centre.

#### **3-SEC-68**

[Ex.3-1-1, Table 1]

- a. Please provide actual customer numbers and billing determinants for 2025.
- b. Please rerun the load forecasting model incorporating the 2025 actuals.
- c. Please provide a comparison of the forecasted 2025 to weather normal 2025 actuals.

### **3-SEC-69**

[Ex.3-1-1, Appendix A] With respect to the Power Advisory Report:

- a. The cover page states that the report is dated November 12, 2022. Please confirm that the report contains 2024 actual data. If confirmed, please provide the date of the update.
- b. [Tables 111 and 112] Please provide the underlying assumptions for these two tables.
- c. [Tables 121 and 122] Please explain the source of the “existing conversions” percentage in each table.
- d. [Page 116] Please provide a listing of the forecasted additional loads before prorating was done and explain how the proration was determined.
- e. [Tables 131 and 132] Please explain how the eDSM kW's were determined.

### **4-SEC-70**

[Ex.4] Please provide a revised version of Appendix 2-JA, 2-JC, and 2-K that includes information beginning in 2014.

### **4-SEC-71**

[Ex.4-1-6, p.1] Please confirm that the Common Corporate program costs include the Corporate Allocations from the holding company.

### **4-SEC-72**

[Ex.4-1-6, p.7 and Table 4] With respect to Technology (IT/OT) segment costs:

- a. Please update 2025 costs and then breakout the costs shown in Table 4 into the functions listed on page 7.
- b. Please provide details of all costs included under Technology which are related to the Dx Next project.

### **4-SEC-73**

[Ex.4-1-6, Table 5 and p.31] With respect to People and Culture costs:

- a. Please breakout the costs shown in Table 5 into its various drivers.
- b. Please provide further details with respect to the costs of “increased activity from consultants supporting strategic planning and Elexicon’s One Culture framework”.
- c. Please provide further details on the One Culture framework.

### **4-SEC-74**

[Ex.4-1-6, Table 6 and p.34] With respect to Finance segment costs:

- a. Please breakout the costs shown in Table 6 into its various drivers.
- b. Please provide further details with respect to the “significant expense to retain external consultants” as it applied to historical costs in the Finance segment.

### **4-SEC-75**

[Ex.4-1-6, p.36-38] With respect to the establishment of a treasury function. Please explain:

- a. Details on the number of FTEs and cost of the new treasury function.

- b. A description of what this new group will be doing and how Elexicon was accessing these services in the past.
- c. Did Elexicon do a business case for the establishment of a treasury function? If so, please provide. If not, please explain why.

#### **4-SEC-76**

[Ex.4-1-6, Appendix 2-M] With respect to one-time regulatory costs shown in Appendix 2-M:

- a. Please provide actuals for spending in 2025 and spending to date for 2026.
- b. Please provide a breakdown of one-time regulatory costs, by type, at the time of the filing of this application.
- c. Please provide a list of consultants and costs.

#### **4-SEC-77**

[Ex.4-1-6, Table 11] With respect to Legal and Corporate Secretariat costs:

- a. Please breakout the costs shown in Table 11 into its various drivers, e.g. insurance, governance, privacy, technology, etc., but also internal labour, external resources, etc.
- b. Please provide details of the added FTEs in this area for 2025-2031.

#### **4-SEC-78**

[Ex.4-1-6, Appendix A, Tables 1, 3 and 5 and p.3 and 28] With respect to the Dx Next project:

- a. Please provide details on how the savings shown in Table 1 were determined.
- b. Please explain how Dx Next will reduce printing and postage costs.
- c. Please provide further details on the outcome of the RFP process, including the nature of the proposals and the range of bids.
- d. Please provide a copy of the auditor's report.
- e. For each legacy system shown in Table 3 that will be retired as a result of Dx Next, please provide the installation date of the software.
- f. Please provide a copy of IBM's 2023 report.
- g. Please confirm that the costs shown in Table 5 are fixed and will not change and only relate to external resources.
- h. Please explain how Elexicon has incorporated the Project Benefits Related to Capital Productivity into the application.

#### **4-SEC-79**

[Ex.4-2-1, Appendix 2-K] With respect to Appendix 2-K:

- a. Please provide the number of FTEs associated with the allocation of Corporate Costs.
- b. Are Corporate Costs FTEs included in Appendix 2-K?
- c. Please breakout overtime costs in Appendix 2-K.
- d. Please breakout incentive pay in Appendix 2-K.
- e. Please breakout the non-management category in Appendix 2-K into union and non-union.
- f. Does the allocation of compensation costs to capital include direct allocation only or also inclusion of overhead burdens? If it only includes direct allocation, please provide a revised amount that includes all allocations of capital (both direct and indirect).

#### **4-SEC-80**

[Ex.4-2-1, p.3] With respect to the increase in the capital work plan and the number of FTEs, please provide details on the percentage of the capital work plan that was done or is forecasted to be done using outside resources, i.e. contractors, for 2020-2031.

#### **4-SEC-81**

[Ex.4-2-1, Table 1] Please update Table 1 with 2025 actuals.

#### **4-SEC-82**

[Ex.4-2-1, Appendix A, p.2] With respect to the Mercer, *Compensation Market Review*, the report states: “Mercer Canada Ltd. (“Mercer”) has been engaged on behalf of Elexicon Energy Inc. (“Elexicon”) to conduct an independent review and benchmarking assessment of the market positioning of Elexicon’s total direct compensation (base salary + short-term incentive + long-term incentive) for a representative sample of union and non-union jobs.”

- a. Did Mercer or Elexicon determine which union/non-union jobs would be part of the sample?
- b. Please confirm whether Mercer consulted with Elexicon on the proposed benchmarking methodology prior to commencing the study/review. If so,
  - i. Please provide copies of any materials Mercer provided to Elexicon describing the proposed methodology, comparator group construction, or benchmarking approach.
  - ii. Please provide any input, advice, comments, or instructions Elexicon provided to Mercer in response.
  - iii. Please provide copies of all correspondence between Mercer and Elexicon regarding the benchmarking methodology, including the scope of the review, the selection of comparator groups and benchmark jobs/positions.

#### **4-SEC-83**

[Ex.4-2-1, Appendix A, p.3] With respect to the Mercer, *Compensation Market Review*, the report states: “For non-sector specific jobs, given Elexicon’s desire to source talent with industry specific knowledge, for the majority of these jobs, a blend of the General Industry peer group and the Energy peer group was used. These non-sector specific jobs require skillsets that are seen both in and outside the utilities/energy industry in Canada. This approach allows the market review to reflect Elexicon’s primary desire for industry specific knowledge, across the majority of jobs, while also recognizing the general industry as a source of talent for non-sector specific jobs for the organization.”

- a. Was the use of a blended comparator group for non-sector-specific jobs proposed by Mercer or Elexicon?
- b. [p.3] Please confirm that Mercer’s General Industry Peer Group is made up of all Canadian organizations, across all industries, from the Mercer Benchmark Database.

#### **4-SEC-84**

[Ex.4-2-1, p.9] With respect to the statement “Elexicon made these essential workforce investments despite insufficient OM&A funding in base rates”:

- a. Please provide the amount of OM&A funding in base rates for 2020-2026.
- b. Please show how Elexicon calculated the amounts in part a.

#### **4-SEC-85**

[Ex.4-2-1, Tables 7,8, 9 and 11]

- a. Please break out Tables 7, 8 and 9 into each year 2022-2025 and update with 2025 actuals.
- b. Please break out Table 11 into each year 2026-2031.
- c. Please provide a list of position titles for each of the added positions in Tables 7, 8, 9 and 11.
- d. Please provide a table of FTEs since 2020 to 2031 by OM&A program.

#### **4-SEC-86**

[Ex.4-2-1, p.39] With respect to Elexicon's vacancy rate:

- a. Please provide the actual vacancy rate each year between 2020 and 2025.
- b. What vacancy rate is Elexicon forecasting for each year between 2026 and 2031?
- c. How does Elexicon incorporate the vacancy rate into Appendix 2-K (e.g. adjust the FTEs and/or adjust the compensation?)

**4-SEC-87**

[Ex.4-3-1, Tables 4 and 5 and Appendix 2-N] With respect to Corporate Cost Allocations:

- a. Please provide a breakdown of the Corporate Governance costs allocated to Elexicon for 2020-2027.
- b. Please explain where the costs are recorded for the services Elexicon provides to EC (i.e. \$321.4k in 2025).
- c. Please explain what EEU is and what the allocation is for.

**6-SEC-88**

[Ex.6-2-1] Please provide the revised PILs calculation for each year based on the passage of Bill C-15 and the reinstatement of the AII Program.

**6-SEC-89**

[Ex.6-2-1] Please provide a table that shows the weighted CCA rate for in-service addition in a given year, (e.g. the weighted average CCA rate in 2027 for 2027 in-service additions only), excluding the impact of the AIIIP, by OEB category, for each year of the plan.

**6-SEC-90**

[Ex.6-2-1, Attachment 5, pdf p.24] Please explain why Elexicon is forecasting no Federal Apprenticeship Job Creation tax credits, when Exhibit 4 refers to apprenticeship programs.

**7-SEC-91**

[Ex.7-1-1, Tables 6, 7 and 8] With respect to cost allocation:

- a. Please provide the underlying data for the calculation of the Weighting Factors for Meter Reading shown in Table 6.
- b. Please recalculate the 2026 weighted charges using 2026 billing determinants.

**8-SEC-92**

[Ex.8] Please provide a table that shows, for each year between 2014 and 2031, and for each rate class and rate zone, a) distribution monthly service charge, b) distribution volumetric charge, c) fixed group 2 DVA riders, and d) volumetric group 2 DVA riders. Please provide the information in Excel format.

**8-SEC-93**

[Ex.8-1-1, p.1 and Tables 44 and 45] With respect to bill impacts:

- a. Please provide the bill impacts shown in Tables 44 and 45 specifically related to harmonization.
- b. Please provide the bill impacts shown in Table 44 not including any riders.

**8-SEC-94**

[Ex.8-1-1, Table 30] With respect to Specific Service Charges:

- a. Please provide a version of Table 30 which distinguishes between charges that are being eliminated versus charges that are being replaced by time and materials.
- b. For the three WRZ charges that are being replaced by time and materials, i.e. reconnect at pole during regular hours for non-payment, temporary underground service installation and removal without a transformer, and service calls for customer-owned equipment (including after-hours calls), please provide a range of typical cost for each service.
- c. Please provide the number of actual instances of each service shown in Table 30 for 2021 to 2025 and the forecast for 2026 to 2031.

#### **8-SEC-95**

[Ex.8-1-1, Table 36] With respect to the Loss Factor Calculation, please update Table 36 with 2025 actuals.

#### **9-SEC-96**

[Ex.9-3-5, p.18] With respect to the Cloud Computing Implementation Account, the OEB's letter establishing this account<sup>2</sup> states that the account "will record incremental cloud computing implementation costs incurred by utilities and any related offsetting savings, if applicable" and notes that "costs recorded must be incremental to amounts embedded in base rates, if any, regardless of whether the cloud costs are treated as operations or capital costs in base rates.":

- a. Please explain why Elexicon states "all Dx NEXT-related amounts are outside of the base upon which rates are determined."
- b. Please explain why Elexicon has not included any related offsetting savings in this account.
- c. Please explain how Elexicon intends to handle any over or underspending in 2026 and 2027 compared to forecast.

#### **9-SEC-97**

[Ex.9-3-5, p.8, Table 9] With respect to the 1508 Sub Account – Pole Attachment Revenue Variance:

- a. Please update Table 9 for the actual number of poles.
- b. Please provide the number of poles for Veridian and Whitby for 2020-2024.

#### **9-SEC-98**

[Ex.9-3-5, p.26, Table 16] With respect to 1592 PILS and Tax Variances – CCA Changes:

- a. Please update the proposed disposition to include 2025 actuals.
- b. Please update the proposed disposition to include the impact of the passage of Bill C-15 and reinstatement of the AIPP beginning in 2026.
- c. Please provide the supporting calculations for each of (a) and (b).
- d. Please confirm that the total claim for 2018 should be a credit not a debit.

#### **9-SEC-99**

[Ex.9-3-7, Tables 12, 13 and 14] With respect to proposed disposition periods, please provide scenarios (e.g. riders and bill impacts) where all Group 2 DVAs (except for the Cloud Computing Implementation Account) are disposed in one year.

#### **9-SEC-100**

[Ex.9-4-2, p.24] With respect to the Non-Wires Solutions ("NWS") Deferral Account:

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<sup>2</sup> <https://www.oeb.ca/sites/default/files/Accounting-Order-Cloud-Implementation-Costs-20231102.pdf>

- a. Please explain how this account is different from using the Lost Revenue Adjustment Mechanism Variance Account (“LRAMVA”) for distribution-rate funded NWS activities.
- b. How does Elexicon propose to account for any capital savings resulting from the use of a NWS?

**9-SEC-101**

[Ex.9-4-2, p.28, Table 4] With respect to the Large Load Revenue Variance Account (“LLRVA”):

- a. Please update the table with actual 2025 data.
- b. For each of the 15 customers included in the account please provide details on the status of the new connection, e.g. inquiry only, application made, contribution made, etc.
- c. Please explain how the LLRVA accounts for non-normal weather.

**10-SEC-102**

[Ex.10-2-1, Table 1] With respect to the updated costs for the Control Centre Segment:

- a. Please provide actual 2025 costs.
- b. How many Apprentice Operators left in the January 2025 to March 2026 period? Of those, how many were related to Temporary Residency status? What were the other reasons for leaving?
- c. How many Qualified Operators left in the January 2025 to March 2026 period? Of those, how many went to other utilities? What were the other reasons for leaving?

**10-SEC-103**

[Ex.10-2-1, p.10] With respect to the updated compensation for the Control Centre Segment:

- a. Does Elexicon plan to match Toronto Hydro’s compensation for Qualified Operators?
- b. Does Elexicon plan to increase the compensation for Apprentice Operators? If so, by how much?

Respectfully submitted on behalf of the School Energy Coalition, this 10<sup>th</sup> day of April, 2026.

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Mark Rubenstein  
Counsel for the School Energy Coalition