



April 10, 2026

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Acting Registrar

Dear Mr. Murray,

**Re: Elexicon Energy Inc. ("Elexicon")
Application for electricity distribution rates and other charges beginning January
1, 2027
Board File No.: EB-2025-0312**

We are counsel to the Distributed Resource Coalition ("**DRC**") in the above-noted proceeding. Please find attached the interrogatories of DRC to Elexicon pursuant to Procedural Order No. 1, dated March 2, 2026.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer".

DT Vollmer

c. Cara Clairman, Plug'n Drive
Devin Arthur, Electric Vehicle Society

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

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

EB-2025-0312

INTERROGATORIES

OF

DISTRIBUTED RESOURCE COALITION

April 10, 2026

Question: **1-DRC-1.**

Reference: • Exhibit 1, Tab 2, Schedule 1
 • Exhibit 4, Tab 1, Schedule 1, p. 18

Preamble: Elexicon Energy Inc. (“**EE**”) notes the changing customer behaviours around electricity use (e.g. electric vehicles [**EVs**] and heat pumps). EE further notes that electrification trends and the integration of distributed energy resources (“**DERs**”) will increase system complexity, impacting load profiles, grid operations, and customer usage patterns.

- a) Please discuss the impacts of the growing consumer interest in EVs and associated increase in EV penetration in EE’s service territory, on EEs distribution system planning, load forecast, productivity, and OM&A costs.
- b) Please identify in the record where EE provides details of how technological advancement will require training their workforce over the course of 2027-2031 period to ensure EE is able to sustain a safe and reliable grid as the energy transition accelerates.
- c) Please confirm and comment on whether the anticipated increased adoption of DERs and EVs over the 2027-2031 period and beyond will require investments in EE’s workforce and please discuss what will be involved in training the workforce for EE’s proposed approach (timeframes, new approaches, etc.).
- d) Please comment on what training, programs, and investments will be needed if a more ambitious energy transition and EV and DER adoption scenario occurs over the next five years and beyond. In your response, please comment on what training and upgrading of workforce skills will be needed to ensure that EE’s workforce is able to meet the challenges of an accelerated energy transition in this and the next decade and how does this compare to EE’s current approach and the approach proposed in the Application.
- e) Similarly, please discuss any disadvantages where a lower electrification scenario materializes.

Question: 1-DRC-2.

Reference: • Exhibit 1, Tab 2, Schedule 1

Preamble: As EV adoption increases, it is expected that more customers will require guidance on how their new vehicle affects electricity usage, billing, and home charging.

- a) Please explain what steps are required and what costs are incurred for a single residential unit to install and connect an EV home charger through the typical layout process. In your response, please discuss any known or anticipated challenges encountered by EE's customers.
- b) Please explain what steps are required and what costs are incurred for commercial facilities or multi-unit residential buildings to carry out the necessary upgrades to connect EV chargers. In your response, please discuss any known or anticipated challenges encountered by EE's customers.
- c) Please indicate how many of each of the following types of customer connections EE facilitated in its service territory in the previous 5-year period-present:
 - (i) single residential unit EV charger connections;
 - (ii) commercial facility EV charger connections; and
 - (iii) multi-unit residential EV charger connections.
- d) Please indicate how many of each of the following types of customer connections EE anticipates in its service territory over the 2027-2031 rate period:
 - (i) single residential unit EV charger connections;
 - (ii) commercial facility EV charger connections; and
 - (iii) multi-unit residential EV charger connections.
- e) Please provide and/or summarize any and all working papers, reports, and analysis conducted to support EE's demand forecasts of expected EV penetration on its service territory that is in addition to any materials included in the Application.

- f) Please indicate whether or not EE has considered or will consider bidirectional, “vehicle to grid” (“**V2G**”), “vehicle-to-home” (“**V2H**”), “vehicle-to-business” (“**V2B**”, and together with V2G and V2H, “**V2X**”) flow, and if so, please provide any and all assumptions and data considered by EE not provided in the Application.

Question: 1-DRC-3.

Reference: • Exhibit 1, Tab 5, Schedule 1

Preamble: EE's rate framework provides Cost of service rebasing in 2027, followed by a Custom Revenue Cap Index ("CRCI") applied in each of years two through five (2028–2031), as follows:

$$\text{CRCI} = I_n - X + G + \text{IPD}_{\text{oma}} + \text{RGF}$$

where,

- "I" is OEB's annually published Inflation Factor applicable to electricity distributors;
 - "X" is the sum of the fixed productivity factor plus a fixed utility-specific stretch factor;
 - "G" is a fixed factor representative of the growth in utility costs associated with output growth;
 - "IPD" is a fixed factor representative of the rate at which EE's OM&A input costs are increasing relative to the rate of inflation provided for in "I"; and
 - "RGF" is calculated as the increase in current year Service Revenue Requirement ("SRR") relative to prior year SRR, net of I, G and IPD_{oma}
- a) Please outline EE's assumptions in the two-component "X" productivity factor in the above equation regarding capacity, load changes, and leveraging due to EVs and other DERs in each of years two through five.
- b) Please outline EE's assumptions in the "G" term in the above equation regarding capacity, load changes, and leveraging of EVs and other DERs in each of years two through five.
- c) How were each of DERs, EVs, and EV charging infrastructure treated for the purpose of setting the "IPD" factor at which EE arrived?

Question: **1-DRC-4.**

Reference: • Exhibit 1, Tab 7, Schedule 2, Appendix A

Preamble: EE engaged Innovative Research Group Inc. ("**Innovative**") to design, execute and document the results of its application-specific customer engagement activities.

- a) Please provide a copy of or summarize written instructions provided by EE to Innovative in relation to the respective customer engagement mandate and the report provided in Exhibit 1, Tab 7, Schedule 1, Appendix A (the "**Innovative Report**").
- b) Please provide a copy of or summarize all written instructions provided by EE to Innovative in relation to customer engagement with respect to consumer choice in integrating new technologies like EVs, solar power, and battery storage (including V2X).
- c) Please describe all measures undertaken by EE and Innovative to invite and ensure the participation of EV stakeholders and other DER customers (including EV drivers, owners of DERs, EV associations, and DER industry associations) in EE's application-specific customer engagement activities.
- d) Please provide or summarize any and all notes relating to EVs and DERs from each of the customer engagements that are supplementary to the Innovative Report.

Question: 1-DRC-5.

Reference: • Exhibit 1, Tab 7, Schedule 2

Preamble: EE notes that through its ongoing and future customer engagement it will leverage the strategic insights gathered during the 2024-2025 period to strengthen its relationships with customers, support effective grid planning, and take actions to facilitate the energy transition.

EE further notes that interest in potential adoption of DER solutions is a key accounts customer priority and that customers are concerned about DER connection requirements and timelines, particularly for DER requests greater than 10kW that require increased stakeholder engagement with longer associated timelines.

- a) Please discuss or summarize how the outcomes and priorities of EE's customers have changed compared to historical equivalents and discuss any trend lines in customer priorities related to the adoption and integration of technologies like DERs, EVs, and battery storage (including V2X).
- b) Please provide further details and discuss the key accounts customer priority for adoption of DER solutions.
- c) Please summarize and discuss the concerns from customer regarding DER connection requirements and timelines (e.g., type of customer, type and size of DER, etc.) and how EE intends to respond to these concerns.
- d) Please discuss what EE means by "Work with internal teams at Elexicon to improve internal processes including DER connection workflows and capacity expansions to reduce administrative burden and accelerate turnaround times."
- e) Please provide details about the identified "Coordinate Municipal Energy Planning and Engagement" initiatives (Energy Efficiency, DERs, electrification and other customer-focused programs to support aligned communications, timely project execution and enhanced municipal partnerships.)
- f) Please describe and discuss the impacts of the types of required stakeholder engagements referenced in the preamble.

Question: 2-DRC-6.

Reference: • Exhibit 2B, Tab 3, Schedule 1

Preamble As part of EE's Asset Management ("**AM**") process that describes key elements and methodologies that have informed the development of EE's Capital Expenditure Plan, the EV forecast estimates peak load impacts associated with the growing adoption of EVs, and considers vehicle population, EV sales targets and adoption rates and the load impact per EV.

- a) Please indicate whether EE has evaluated managed EV charging (including time-of-use optimization, demand response, or utility-coordinated charging) as a means of mitigating peak demand.
- b) Please provide any analysis comparing:
 - (i) unmanaged EV charging load impacts; and
 - (ii) managed or optimized charging scenarios.
- c) Please discuss whether announced allowance of up to 49,000 Chinese EVs into the Canadian market, with the most-favoured-nation tariff rate of 6.1%,¹ and the introduction of the Electric Vehicle Affordability Program:
 - (i) impacts or changes any of EE's AM analysis; and/or
 - (ii) alters the forecast of the number of EVs in EE's service territory and the share of light vehicles that are expected to be EVs.
- d) Please discuss how EE's current EV adoption forecast reflects existing and current federal policy and incentives, and whether EE intends to update its assumptions if it does not.
- e) Please provide any available updates to EE's forecasted annual EV sales as a percentage of new vehicle sales in its service area in 2027, 2030, and 2035.
- f) Has EE undertaken any benchmarking or comparative analysis of its EV adoption and load forecasts against those of other Ontario LDCs? If not, please explain why EE did not undertake such benchmarking. If yes, please

¹ See Prime Minister of Canada, "[Prime Minister Carney forges new strategic partnership with the People's Republic of China focused on energy, agri-food, and trade](#)", (16 January 2026).

provide a summary of the results of any such benchmarking, including a comparison of:

- (i) projected EV penetration rates (as a % of customers or vehicles);
- (ii) projected EV-related annual load; and
- (iii) load growth attributable to EVs over the test period (2026 and beyond).

g) Please indicate how many of each of the following types of customer connections EE facilitated in its service territory over the 2026-2031 period:

- (i) single residential unit EV charger connections;
- (ii) commercial facility EV charger connections;
- (iii) condo EV charger connections; and
- (iv) renewable energy and back up generation, including the type of facility (solar roof top, solar thermal, wind, energy storage) and the customer breakdown for such facilities (residential, general service, commercial/industrial, and/or large industrial).

h) Please indicate how many of each of the following types of customer connections EE anticipates in its service territory over the 2026-2031 period:

- (i) single residential unit EV charger connections;
- (ii) commercial facility EV charger connections
- (iii) condo EV charger connections; and
- (iv) renewable energy and back up generation, including the type of facility (solar roof top, solar thermal, wind, energy storage) and the customer breakdown for such facilities (residential, general service, commercial/industrial, and/or large industrial).

i) Have any EE customers been prevented from or delayed in installing EV charges as a result of capacity constrains in EE's distribution system? If so, how many customers have been prevented or delayed and for how long?

j) Please provide details as to the areas in EE's service territory experience the highest reliability and safety risks associated with EV adoption and DER connections (such as neighbourhood, number of DERs connected, overview of risks and reliability issues, customer concerns, etc.). If EE is unable to

provide further details, please explain why not and whether such information may be obtained in this proceeding or subsequent proceedings.

- k) What are the consequences if EV growth rates exceed EE's "High Scenario" forecasts? Please include in your response a discussion on what challenges this will present in terms of EE's ability to meet the higher demand and any consequences it may have on EE's ability to meet demand past 2031 if demand continues to accelerate more quickly than anticipated.
- l) Please discuss the disadvantages and downside risks to EE's distribution system, customers, investments in EVs and DERs, infrastructure, and/or workforce of underinvesting in EV infrastructure and DER connection and adoption infrastructure if an accelerated energy transition causes a higher electrification scenario to materialize compared to the one relied upon in the Application. Please also discuss the implications of underinvestment over the rate period (2027-2031), mid-term (2031-2041), and long-term (2041 onwards).
- m) Similarly, please discuss any disadvantages where a delayed energy transition causes a lower electrification scenario to materialize.
- n) Please comment on known barriers to EV adoption in EE's service territory, including for multi-unit rental residential, and how the Application seeks to address these barriers and ensure equitable access to charging infrastructure for all customers.
- o) Does EE have any programs to support the upgrading of supply infrastructure to enable EV charging infrastructure when EE is planning expansion or upgrades? If yes, please provide details. If no, please discuss what types of programs could be developed to support proactive and future infrastructure upgrades to enable equitable access to EV charging infrastructure for all customers.
- p) Please provide EE's views on any barriers to EV adoption for residents of multi-unit complexes in EE's service area. Among any other views, please provide specific comment on whether multi-unit residential complexes represent one of the more challenging venues for EV adoption, and whether EE agrees that addressing those challenges should be prioritized. Please explain EE's position on each of these points.
- q) Please describe any ongoing activities or initiatives proposed by EE that can help to address challenges specific to EV transition in multi-unit residences by way of proactive infrastructure upgrades or future upgrades. Please include any planned or anticipated initiatives at the system-wide level in addition to any more localized initiatives.

Question: 2-DRC-7.

- Reference:
- Exhibit 2B, Tab 3, Schedule 2, Appendix A
 - Exhibit 2B, Tab 4, Schedule 3, Appendix P

Preamble: EE's grid modernization plan entails an accelerated pace of investments in scaling proven technologies to provide near and long-term reliability, resiliency and efficiency benefits, including:

- an incremental test-and-learn approach for emerging solutions and investments to address future expectations with respect to the integration of DERs, and increased load growth resulting from electrification of the grid as well as customer growth within the region;
- DERMS to coordinate decentralized generation and storage; and
- Distribution System Operator (DSO) enablement modules to support bi-directional power flow and local energy markets.

- a) Please explain the criteria used by EE to classify solutions as "proven" versus "emerging."
- b) Please describe in detail the governance framework for the test-and-learn approach, including:
 - (i) project selection criteria;
 - (ii) performance metrics; and
 - (iii) decision thresholds for scaling or discontinuing initiatives.
- c) Please explain how ratepayer risk is managed in respect of pilot or test-and-learn investments.
- d) Please confirm whether EE has any planned or ongoing EV-related pilot projects as part of the test-and-learn approach, including:
 - (i) managed charging;
 - (ii) smart charging infrastructure; or
 - (iii) V2X pilots.
- e) Please describe how lessons learned from any pilot projects that result from grid modernization investments will be incorporated into future planning.

- f) Please identify any dependencies (technical, regulatory, or market-based) required for DERMS functionality.
- g) Please describe EE's understanding of the DSO role and how it differs from its current role as a distributor.
- h) Please identify all DSO-related modules or functionalities proposed in the DSP.
- i) Please provide the total forecast cost of any anticipated DSO enablement investments, by year and program.
- j) Please explain the extent to which DSO functionality is dependent on:
 - (i) IESO market reforms;
 - (ii) OEB policy direction; and
 - (iii) third-party participation.
- k) Please identify the portions of the distribution system currently capable of accommodating bi-directional flows.
- l) Please describe the technical limitations of the existing system in supporting such flows.
- m) Please provide the incremental investments required to enable bi-directional capability, by asset class (e.g., feeders, substations, protection systems).

Question: 2-DRC-8.

Reference: • Exhibit 2B, Tab 4, Schedule 3, Appendix P

Preamble: EE's Operational Technology ("OT") Systems Program is a strategic investment in OT systems modernization, ADMS/DERMS enhancements, and grid modernization to support reliability, cybersecurity resilience, outage response, and efficient operations..

- a) Please discuss the impacts on EE's system if the OT Systems Program is delayed.
- b) Please describe if and/or how dispatch instructions or curtailments issued through ADMS/DERMS will be prioritized where multiple DERs or EV assets are affected, including whether priority will be based on contract type, market participation, or system need.
- c) Please explain how EE will determine and communicate locational constraints for DERs and EV charging assets, including how:
 - (i) frequently they will be updated; and
 - (ii) they will be communicated to DER owners or aggregators.
- d) Please confirm whether EE intends to publish feeder-level or station-level capacity maps suitable for DER and EV project siting decisions, and provide the expected timing.
- e) Please identify which DER and EV-enabling capabilities will be fully functional by the start of each year of the DSP period (2027-2031), including automated interconnection, dynamic hosting capacity, DER registration, telemetry aggregation, and dispatch coordination.
- f) Please explain the risks to DER and EV owners and aggregators if the timing of the ADMS/DERMS investments is delayed, including whether such delays would limit participation in non-wires solutions or wholesale markets or result in additional costs or requirements for DER proponents.
- g) Please confirm whether EE has undertaken any analysis of EVs as grid-interactive resources (including as dispatchable or flexible load, storage, or supply resources). If yes, please provide and/or summarize all studies, analyses, or internal assessments. If no, please explain why not, given the projected increase in EV adoption within EE's service territory.

- h) Please confirm whether EE's proposed ADMS/DERMS investments will support bidirectional EV charging (including V2X). If yes, please describe the specific functionalities, technical requirements, and timelines for enabling such capabilities. If no, please explain:
 - (i) whether such capabilities were considered;
 - (ii) why they were not included; and
 - (i) whether they are expected to be required within or beyond the DSP period.

- i) Please identify any barriers (technical, regulatory, market, or standards-related) to implementing V2X capabilities.

Question: 2-DRC-9.

Reference: • Exhibit 2A, Tab 4, Schedule 3, Appendix M

Preamble: EE notes that as part of its Fleet Renewal it continues to monitor the market and other utility experiences for other EVs, to understand if and when other types of EVs may be suitable.

a) Please complete the following chart indicating the breakdown of vehicle type in EE’s current vehicle fleet:

Vehicle Type	Fully Electric	Plug-in Hybrid	Hybrid	Non-EV/Hybrid	Total
Heavy Duty Vehicles					
Medium Duty Vehicles					
Light Duty Vehicles					

b) What proportion of EE’s planned fleet renewal investment will or could involve fully electric and/or hybrid vehicles? Please complete the following chart indicating EE’s anticipated breakdown of vehicle type in EE’s planned fleet renewal investment (2027 to 2031):

Vehicle Type	Fully Electric	Plug-in Hybrid	Hybrid	Non-EV/Hybrid	2027-2031 Total
Heavy Duty Vehicles					
Medium Duty Vehicles					
Light Duty Vehicles					

c) Please indicate the estimated quantum of efficiency savings (including fuel cost savings) that EE anticipates it will achieve by utilizing hybrid vehicles and EVs rather than traditional internal combustion engine vehicles.

Question: **3-DRC-10.**

Reference: • Exhibit 3, Tab 1, Schedule 1, Attachment 3-2

Preamble: EE engaged Power Advisory to develop weather-normal customer and load forecasts for each of its rate zones.

- a) Please discuss how Power Advisory and EE’s load forecast considers the impact and integration of EVs and EV charging infrastructure and provide or summarize any and all related analysis, working papers, and/or reports not already included in Power Advisory’s report.

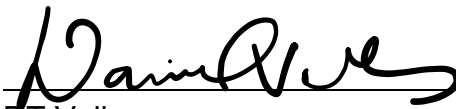
- b) Please provide, in the chart format below, an assessment of the impacts on loads and demands — including the load forecast — of EE’s estimate of EVs and distributed generation in each year and any supporting references.

	2025	2026	2027	2028	2029	2030	2031
EVs (number, kW or kWh)							
EV charging infrastructure (number, kW or kWh)							
Distributed Generation (number, type, kW or kWh)							
etc.							

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
10th day of April, 2026



Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for DRC



DT Vollmer
Resilient LLP
Counsel for DRC