



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

April 10, 2026

VIA E-MAIL

Ritchie Murray
Acting Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Mr. Murray:

**Re: EB-2025-0312 Elexicon Energy Inc.
Custom Rate Application Rates 2027-2031
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Please find attached the revised interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

A handwritten signature in black ink, appearing to read 'M. Garner', written in a cursive style.

Mark Garner
Consultants for VECC/PIAC

Erin Stevens, Director, Regulatory Affairs, Elexicon Energy Inc.
estevens@elexiconenergy.com

Charles Keizer, Torys LLP, Counsel to OPG
ckeizer@torys.com

REQUESTOR NAME	VECC
TO:	Elexicon Energy Inc. (Elexicon)
DATE:	April 10 2026
CASE NO:	EB-2025-0312
APPLICATION NAME	2027-2031 Custom Rate

1.0 ADMINISTRATION (EXHIBIT 1)

1.0-VECC-1

Reference: Exhibit 1, Tab 5, Schedule 1, page 19, Table 8

- a) For purposes of setting the approved rates for 2028-2031, will the Other Revenue forecast for 2028-2031 used in the Application to determine each year's Base Distribution revenue be updated to reflect the Retail Service Charges and Pole Attachment charges approved for those years or are the forecast values shown in Table 8 being proposed for final approval in this application?

1.0-VECC-2

Reference: Exhibit 1, Tab 2, Schedule 1, page 38

"Elexicon also made revisions to its Plan given the cloud-based nature its ERP solution. Upon further assessment of the Dx NEXT project, the implementation costs were determined to be OM&A expenses and not capitalizable."

"Elexicon's draft plan included some high-level costing assumptions which were updated for the final plan."

- a) Were these changes made after the conclusion of the customer engagements?

1.0-VECC-3

Reference: Exhibit 1, Tab 3, Schedule 1A, page 7

- a) Please provide a redline version of Elexicon's Conditions of Service which show the changes summarized in Table 1.

1.0-VECC-4

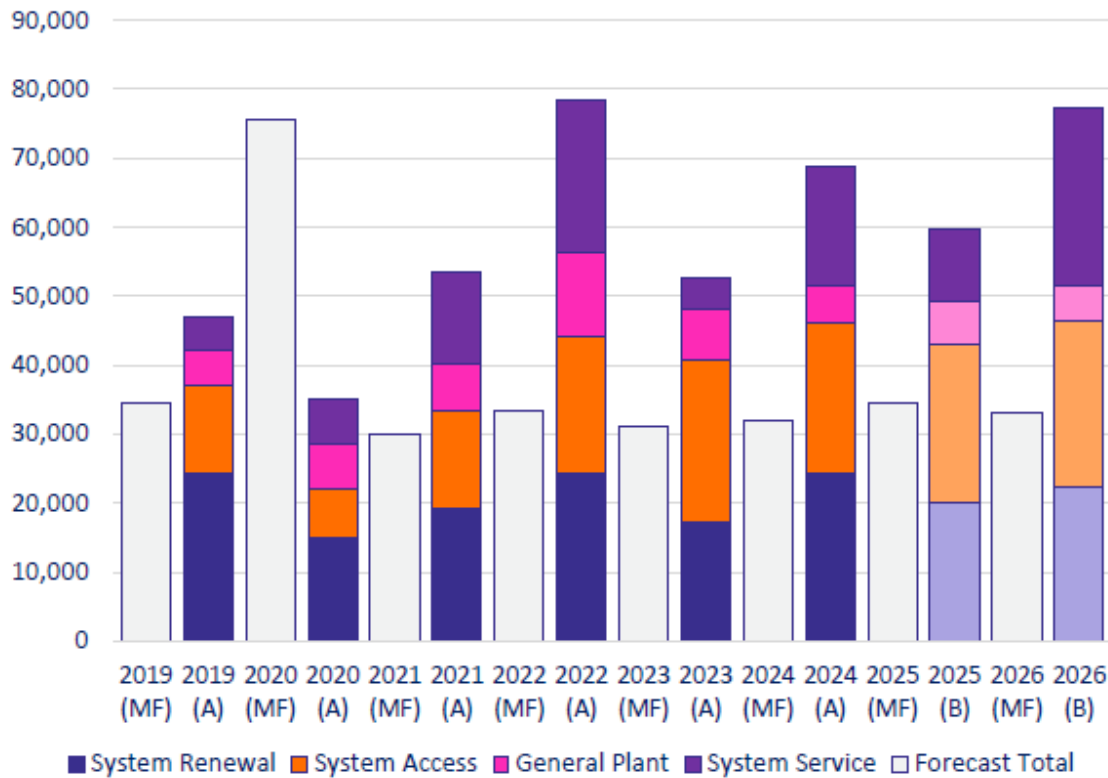
Reference: Exhibit 1, Tab 3, Schedule 2, page 1 of 3 Figure 1 /@B Tab 1, Schedule 1, section 2.1

- a) What is the distinction between a “Service Area” and a “Service District”?
- b) Please explain for which “Areas” or “Districts” Elexicon records system reliability and capital investment data.

1.0-VECC-5

Reference: Exhibit 1, Tab 4, Schedule 1

Figure 3: Merger Forecast (MF) vs Actual (A) and Bridge (B) Capital Spend by Category (\$k)¹¹



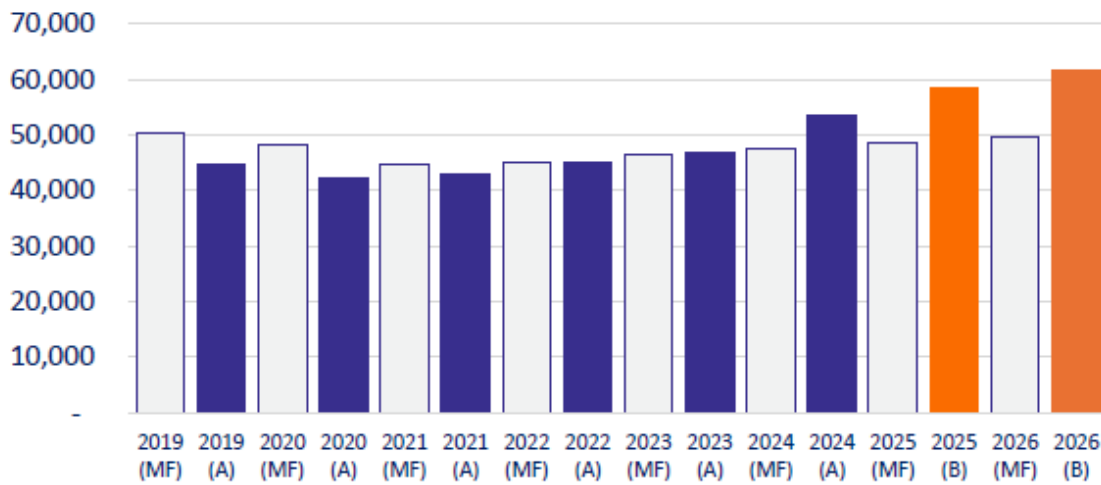
- a) Please provide the underlying data from which this figure is derived.
- b) Please provide a revised Figure 3 which:
 - i. Shows ICM projects separately (i.e. as an additional category).

- ii. Shows for the Merger forecast columns by the same breakdown as show for the actual columns (i.e., by System Renewal/Access/Service and General Plant).
- c) Please provide the revised Figure 3s with actual 2025 results.

1.0-VECC-6

Reference: Exhibit 1, Tab 4, Schedule 1

Figure 12: OM&A Merger Forecast (MF) vs Actual (A) and Bridge (B) by Year (\$k)



- a) Please provide the underlying data from which this figure is derived.
- b) Please provide a revised Figure 12 which shows the costs for both Merger Forecast and Actual costs by category (i.e., Operations, Maintenance, Billing and Collecting, Community Relations and Administrative and General).
- c) Please update the revised Figure 12s to include 2025 actual results

1.0-VECC-7

Reference: Exhibit 1, Tab 4, Schedule 1 PDF 89

- a) What is P90 Weather Corrected Base?

1.0-VECC-8

Reference: Exhibit 1, Tab 8, Schedule 1

a) Please provide the 2025 Audited Financial Statements.

1.0-VECC-9

Reference: Exhibit 1, Tab 5, Schedule 1 – Appendix A ClearSpring

CIR Period	Exlexicon Average % Difference
2027-2031	-13.9

CIR Period	Alectra Average % Difference
2027-2031	-21.5

- a) The first table is from ClearSpring’s Benchmarking Report of November 2025 for Exlexicon (“Exlexicon Report”). The second from ClearSpring’s Benchmarking Report of July 2025 for Alectra Utility- EB-2025-0252 (“Alectra Report”). In both cases ClearSpring recommends at 0.15 Stretch factor to their clients. Please explain why the different CIR results support identical recommendations.
- b) The OM&A-specific IPD in the Alectra Report is 0.36%, whereas it is 0.25% in the Exlexicon Report. What is the theoretical basis (explanation) for a different input price differentials on OM&A related costs for similar Ontario Utilities during a similar time period?
- c) *“The weight on customer growth is 53.1% and the weight on system peak demand is 46.9%”. “The weight on customer growth is 52.9% and the weight on system peak demand is 47.1%”* (Alectra Report). Why are these weights different in the two Reports?

1.0-VECC-10

Reference: Exhibit 1, Tab 5, Schedule 1 – Appendix A ClearSpring

a) ClearSpring (and Pacific Economics) have produced a number of similar reports in proceedings before the Board. To ClearSpring’s knowledge have any of these Reports or their findings being reviewed, discussed or analyzed in any peer reviewed academic journal? If so, please provide those papers.

2.0 RATE BASE AND CAPITAL (EXHIBIT 2)

2.0-VECC -11

Reference: Exhibit 2B, Tab 3, Schedule 1, pages 18-19
Load Forecast Model, Additional Growth Tab

- a) Does the Additional Growth Tab set out the population forecast growth rates used for forecasting the number Residential customers for purposes of the load forecast used in Exhibit 2B?
- b) If not, please provide the 2025-2031 forecast population growth rates used in Exhibit 2B for the VRZ and WRZ rate zones.
- c) With respect to Commercial and Industrial (page 19), please provide the resulting forecast commercial and industrial accounts or account growth rates for 2025-2031. If available, please report the values for Commercial and Industrial separately.

2.0-VECC -12

Reference: Exhibit 2B, Tab 3, Schedule 1, page 19

Preamble: The Application states that the Commercial & Industrial forecast incorporates “*committed connection requests for large upcoming commercial & industrial loads*”:

- a) Please provide a schedule that sets out the number of committed connection requests to add load and the total associated MWs for each year 2025-2031 as included in the load forecast described in Exhibit 2B. (Note: As part of the response please indicate whether the values provided for each year are incremental or cumulative)
 - i. If the forecast also includes existing customers requesting an increase in capacity to serve additional load, please separate these out from new customers and report the number of existing customers and MWs separately.

2.0-VECC -13

Reference: Exhibit 2B, Tab 3, Schedule 1, pages 16-27

Preamble: The Application states:
“*In summary, the four inputs – Weather-Normalized Baseload, high scenario Customer Growth, high scenario Building Electrification, and medium scenario Electric Vehicles – were aggregated into an Elexicon Scenario (described above in each input) to produce a consolidated System Peak Load Forecast, shown in Figure 8.*” (page 25)

- a) Please provide (in excel format) a schedule that sets out the annual values for each of the four scenarios shown in Figure 8.
- b) Please provide a schedule (in excel format) that breaks down the annual values for the Elexicon scenario (per Figure 8) as between: i) Weather-Normalized Baseload (per pages 16-18), ii) Customer Growth, iii) Building Electrification, and iv) Electric Vehicles. Furthermore, please breakdown:
 - The annual values for Customer growth as between i) Residential (per pages 18-19), ii) Commercial & Industrial due to macro-economic forecasted growth (per page 19, lines 6-15); and iii) Commercial and Industrial due to committed connection requests for large upcoming commercial & industrial loads (per page 19, lines 16-17).
 - The annual value for Building Electrification as between: i) Residential and ii) Commercial (per pages 21-23).
- c) Please provide a schedule (in excel format) that provides a revised version of the response to part (b) where the Weather Normalized Baseload is based on Normal Weather (i.e., P50 per page 17).

2.0-VECC -14

Reference: Exhibit 2A, Tab 1, Schedule 1, Table 3, page 7

- a) Has Table 3 been updated with respect to the updated filing of April 2, 2026 (Exhibit 10)? If so, please provide a reference, if not please clarify that Control Centre and the Non-Wires BCA evidence do not impact in-service rate base for the 2027-2031 years.

2.0-VECC -15

Reference: Exhibit 2B, Tab 1, Table 11, page 22

- a) Please update Table 11 to show which “Service Area” or “Service District” the major weather event occurred in.

2.0-VECC -16

Reference: Exhibit 2, Tab 1, Schedule 1, page 29

- a) Please show the Investment Plan Objectives as a % of Total Spend 2027 to 2031 by Service Area or Service District.

2.0-VECC -17

Reference: Exhibit 2B, Tab 2, Schedule 2, Tables 22 , 23 and 24

- a) Please update the referenced tables to include 2025 results.
- b) Please provide Tables 22, 23 and 24 by “Service Area” or “District”

2.0-VECC -18

Reference: Exhibit 2B, Tab 2, Schedule 1, pages 48-

- a) Please provide the customer number of interruptions and hours interruption for Defective Equipment broken down by the type of defective asset for the 2020 to 2025 period.
- b) Please also provide the above Tables by “Service Area” or “District.”

2.0-VECC -19

Reference: Exhibit 2B, Tab 3, Schedule 2 Appendix A, Table 2, page 9

- a) Please provide Table 9 by individual year (2027-2031).

2.0-VECC -20

Reference: Exhibit 2B, Tab 4, Schedule 1 , page 16 / Appendix 2A Excel

- a) Between 2024 and 2026 Elexicon spent only \$1.4 million on underground system renewal, yet now proposes over \$50 million during the upcoming rate plan. Please explain how this spending pattern is rationale capital planning.
- b) What specific projects were completed in 2024, 2025 and 2026 in lieu of capital spending on underground renewal?
- c) Please provide the business cases that were provided to support deferred spending during the 24-26 period.

2.0-VECC -21

Reference: Exhibit 2B, Tab 4, Schedule 1, pages 16-17 / Appendix 2A Excel

- a) What explains Elexicon spending nothing on overhead system renewal in 2026?

3.0 OPERATING REVENUE (EXHIBIT 3)

3.0-VECC -22

**Reference: Exhibit 3, Appendix A, pages 49 and 70
Load Forecast, Customer Count Tab**

Preamble: The Application states:
“The (VRZ) Residential growth rate is calculated as the average

of (1) the average growth rate of municipalities in the Veridian rate zone from municipal and regional plans, (2) the Ministry of Finance population forecasts for the region of Durham, and (3) the class's historic growth rate."

"The (WRZ) Residential growth rate is calculated as the average of (1) the forecast average growth rate of Whitby in the Envision Durham regional plan and Monitoring of Growth Rates report from the Region of Durham, (2) the Ministry of Finance population forecasts for the region of Durham, and (3) the class's historic growth rate."

- a) Why use the average of the three values as opposed using just the growth rates from the municipal and region plans as was done for purposes of developing the load forecast used for capacity planning in Exhibit 2B (Tab 3, Schedule 1, page 18).

3.0-VECC -23

Reference: Exhibit 3, Appendix A, page 16
Exhibit 2B, Tab 3, Schedule 1, pages 18-20

- a) Please provide a schedule that compares the increase in Elexicon's Residential customers from 2024 to 2031 as forecasted in Exhibit 3 with the increase in Elexicon's residential customers as used in Exhibit 2B for peak load forecasting. For purposes of the forecast per Exhibit 2B please use the High Growth Scenario as described at page 20.

3.0-VECC -24

Reference: Exhibit 3, Appendix A, pages 55 and 73
Load Forecast, Customer Count Tab
Exhibit 2B, Tab 3, Schedule 1, pages 18-20

Preamble: The Application states with respect to the GS<50 class:
"The Geometric mean of the annual growth from 2015 to 2024 was used to forecast the (VRZ) growth rate from 2024 to 2031." (page 55)
"The Geometric mean of the annual growth from 2015 to 2024 was used to forecast the (WRZ) customer count growth rate from 2024 to 2031." (page 73)

- a) In the Customer Count Tab the annual growth rate used for the WRZ GS<50 class is that from 2016-2024 (not 2015-2024 as stated in Appendix A). Please reconcile .
- b) For the GS<50 class, why not use the same forecast commercial customer account growth rates as developed and used in Exhibit 2B (Tab 3, Schedule 1, page 19)?

- c) Please provide a schedule that compares the increase in Elexicon's GS<50 customers from 2024 to 2031 as forecasted in Exhibit 3 with the increase in Elexicon's Commercial customers as used in Exhibit 2B for peak load forecasting. For purposes of the forecast per Exhibit 2B please use the High Growth Scenario as described at page 20.

3.0-VECC -25

Reference: Exhibit 3, Appendix A, pages 116-117
Load Forecast Model, Customer Count Tab

Preamble: The Application states:
"The additional large loads are forecast based the anticipated volumes of committed and non-committed connection requests. The forecast includes a pro-ration of forecast load based on an assessment of the likelihood that each project materializes".

- a) Please confirm that Table 126 represents the total of the values in Tables 127 to 129.
- b) While titled "GS 3,000 – 4,999 kW Addition Summary", please confirm that Table 129 is the results for the Large Use class.
- c) Please explain why the sum of the 2025 incremental customers shown in Tables 127 to 129 does not equal the number of 2025 incremental customers shown in Table 126.
- d) Do the incremental customer numbers set out in Tables 127 to 129 (and included in the Load Forecast Model per the Customer Count Tab, Rows 15-21 of Columns Q, W, AC, BD and BJ) include a proration based on the likelihood of each project materializing?
- i. If not, please explain why the incremental customer additions set out in the Customer Count Tab (prior to the ½ year adjustment) are not whole numbers and sometimes less than one (For example, the GS50-2,999 additions for WRZ are 5.7, 3.8, 2.8, 1.7, 0.7, 0.7 and 0.3 for the years 2025 to 2031 respectively (per Column BD, Rows 15-21))
- e) Please explain why for the VRZ GS 50-2,999 class the customer counts for 2025-2028 set out in the Customer Count Tab in Column R, Rows 15-18 do not match those in Column R, Rows 25-28. (Note: for the VRZ GS 3,000-4,999, VRZ Large Use, the WRZ GS 50-2,999 and the WRZ 3,000-4,999 classes the comparable rows do match).

3.0-VECC -26

Reference: Exhibit 3, Appendix A, pages 116-117
Exhibit 2B, Tab 3, Schedule 1, page 19

Preamble: Exhibit 3 states:

“Elexicon has estimated a material increase in billed loads from new customers additions beyond what is forecast based on historical volumes and trends. The estimated loads of these customers are added to the rate class forecasts that are produced based on historic loads as described in Section 4.”

“The additional large loads are forecast based the anticipated volumes of committed and non-committed connection requests. The forecast includes a pro-ration of forecast load based on an assessment of the likelihood that each project materializes.”

Exhibit 2B states:

“External to the macro forecasted growth, committed connection requests for large upcoming commercial & industrial loads were also incorporated.”

- a) Please confirm that all the committed and non-committed connection requests considered by Elexicon for purposes of Exhibit 3 are new customer connections (per the first reference).
- b) Are there currently any committed or non-committed connection requests from existing customers seeking to materially increase their load?
 - i. If yes, please indicate the, for each year (2025-2031), the number of customers and incremental MWs involved and how they are captured in the proposed load forecast.
- c) For purposes of determining additional large loads, were the same values used for the number, the timing and the MWs of the committed connection requests in both Exhibit 2B and Exhibit 3?
 - i. If yes, please provide a schedule that sets out the number of committed connection requests by year (2025-2031) prior to pro-ration or ½ year adjustments.
 - ii. If not, why not? Also, please provide a schedule setting the differences by year (2025-2031) in the number of committed connection requests and associated MWs used in Exhibit 3 versus Exhibit 2B prior to pro-ration or ½ year adjustments.
- d) Please provide a schedule setting out number of non-committed connection requests included for purposes of Exhibit 3 prior to pro-ration or ½ year adjustments.
- e) Please explain why a different approach was used for purposes of determining the number of customers adding large load in Exhibit 3 (i.e., included non-committed connection requests but pro-rated based on

likelihood project materializes) versus Exhibit 2B (i.e., only committed connection requests but no proration).

3.0-VECC-27

Reference: Exhibit 3, Appendix A, page 17

Preamble: With respect to the VRZ Residential model, the Application states:

“A time trend variable, equal to 1 in January 2015 and increasing by 1 in each subsequent month was found to be statistically significant and is used in the model. This variable was found to be more statistically significant than other trending variables such as economic variables and the Residential customer count.”

- a) On what basis does Power Advisory determine that a variable’s coefficient is “statistically significant”?
- b) Did Power Advisory test a model that included both a time trend variable and Residential customer count?
 - i. If yes, please provide the results and explain why this model was not adopted.
 - ii. If not, please provide the results of such a model (i.e. coefficient values and statistical results).

3.0-VECC -28

Reference: Exhibit 3, Appendix A, page 20

Preamble: The Application states:

“A time trend variable, equal to 1 in January 2015 and increasing by 1 in each subsequent month was found to be statistically significant and is used in the model. This variable was found to be more statistically significant than other trending variables such as economic variables and the Seasonal Residential customer count.”

- a) Did Power Advisory test a model that included both a time trend variable and Seasonal Residential customer count?
 - i. If yes, please provide the results and explain why this model was not adopted.
 - ii. If not, please provide the results of such a model (i.e. coefficient values and statistical results).

3.0-VECC -29

Reference: Exhibit 3, Appendix A, page 23

Preamble: With respect to the VRZ GS<50 model, the Application states:
“Seasonally-adjusted FTEs has been included as an indicator of economic activity. Measures for Ontario GDP were also tested but found to be statistically less significant than Ontario FTEs. The number of days in each month was found to be statistically significant and was used in the GS < 50 kW model. The COVID_AM variable was found to be statistically significant and more significant than other COVID variables. The GS < 50 kW customer count and time trend variables were not found to be statistically significant.”

- a) Did Power Advisory test a version of the model that included the proposed variables plus a time trend variable?
 - i. If yes, please provide the model (i.e., coefficient values and statistical results).
 - ii. If not, please provide the results of such a model (i.e. coefficient values and statistical results).

3.0-VECC -30

Reference: Exhibit 3, Appendix A, pages 3-4 and 25-28

- a) There is no reference to Power Advisory having tested the inclusion of COVID-related variables in the VRZ GS 50-2,999 model. Were such variables tested?
 - i. If yes, why were they excluded?
 - ii. If not, please test and indicate if any of the COVID variables (per pages 3-4) are statistically significant and should be included.

3.0-VECC -31

Reference: Exhibit 3, Appendix A, page 35

Preamble: With respect to the WRZ Residential kWh model, the Application states:
“The time trend variable and number of days in the month variables were found to be statistically significant and are used in the model. This variable was found to be more statistically significant than other trending variables such as economic variables and the Residential customer count.”

- a) Did Power Advisory test a model that included both a time trend variable and Residential customer count?

- i. If yes, please provide the results and explain why this model was not adopted.
- ii. If not, please provide the results of such a model (i.e. coefficient values and statistical results).

3.0-VECC -32

Reference: Exhibit 3, Appendix A, page 38

- a) With respect to the WRZ GS<50 model, did Power Advisory test a version of the model that included the proposed variables plus a time trend variable?
 - i. If yes, please provide the model (i.e., coefficient values and statistical results).
 - ii. If not, please provide the results of such a model (i.e. coefficient values and statistical results).

3.0-VECC -33

Reference: Exhibit 3, Appendix A, page 47

- a) Please update Table 53 to reflect the most recent forecasts available from each of the referenced sources.

3.0-VECC -34

**Reference: Exhibit 3, Appendix A, pages 2-3
Load Forecast Model, CDM Tab**

- a) Please provide the sources for the data used to populate the CDM Tab – Rows 4 to 126 (actual copies or links to references).
 - i. Please indicate where in each reference the data used to populate the CDM Tab is to be found and/or how it was derived from the references.

3.0-VECC -35

Reference: Load Forecast Model, CDM-eDSM Framework Tab

Preamble: Both the IESO's former CDM Framework and its new eDSM Framework include a Local Initiatives Program.

- a) Has Elexicon confirmed with the IESO that there are no actual 2021-2024 CDM Framework savings available for its service area?
- b) Please describe any Local Initiatives undertaken by Elexicon in 2023 and 2024 as part of the IESO's 2021-2024 CDM Framework - Local Initiatives program and indicate the anticipated savings (MWh) for each of the years 2023-2031.

- c) Please describe any Local Initiatives undertaken by Elexicon in 2025 and undertaken/planned for 2026 as part of the IESO's eDSM Framework - Local Initiatives program and indicate the anticipated savings (MWh) for each of the years 2025-2031.
- d) With respect to the eDSM savings forecast for 2028-2031 (CDM-eDSM Framework Tab, Cells J4-M18), please provide the rationale for the projected savings for each Program area.

3.0-VECC -36

Reference: Exhibit 3, Appendix A, pages 104-110
 Load Forecast Model, EV Forecast VRZ and
 EV Forecast WRZ Tabs
 Government of Canada's new EV Strategy
<https://www.canada.ca/en/innovation-science-economic-development/news/2026/02/prime-minister-carney-unveils-canadas-new-automotive-strategy-to-protect-jobs-and-position-our-country-as-a-global-leader-in-next-generation-vehicl.html>

- Preamble:** .The Application states:
 "Electric vehicle consumption is forecast based on delayed Canada's zero-emission vehicle sales targets, estimated consumption per type of EV, and EV statistics from Statistics Canada."
- a) Confirm that the EV forecast assumes EV sales reach 60% of total new vehicle sales by 2035.
 - b) Please re-do the EV load forecast based on the 75% EV sales target in the Government of Canada's new EV Strategy.
 - c) Please explain the basis for the 10% load factor assumed for EV load (per page 110).

3.0-VECC -37

Reference: Exhibit 3, Appendix A, pages 113-114

Preamble: The Application states:
"Despite the lack of specific information of electric heating conversions, it is reasonable to expect that there will be some incremental consumption within the GS 50-2,999 kW class. The incremental consumption for these conversions is estimated to be equal to the average heating (HDD-related) load of customers in the rate class."

- a) Please provide the calculations supporting the assumed kWh/customer for electric heating for GS 50-2,999 customers used in Tables 121 and 122.

3.0-VECC -38

Reference: Exhibit 3, Appendix A, page 116

Preamble: The Application states:

“The additional large loads are forecast based the anticipated volumes of committed and non-committed connection requests. The forecast includes a pro-ration of forecast load based on an assessment of the likelihood that each project materializes.”

- a) Please provide schedules that set out: i) the number of committed connection requests to add load and the total associated MWs for each year 2025-2031 included in the load forecast and ii) the number of uncommitted connection requests to add load and the total associated MWs for each year 2025-2031 included in the load forecast. For each schedule the MWs reported should be total MWs from the connection requests prior to any pro-ration or adjustments. (Note: As part of the response please indicate whether the values provided for each year are incremental or cumulative)
 - i. If the forecast also includes existing customers requesting an increase in capacity to serve additional load, please separate out from new customers and report the number of customers and MWs separately.
- b) Please provide a schedule setting out how the billed MWs and MWhs set out in Tables 127, 128 and 129 are derived from the MWs (per part (a)) of committed and uncommitted connection requests.

4.0 OM&A (EXHIBIT 4)

4.0 -VECC -39

Reference: Exhibit 4, Tab 3, Schedule 2

- a) If Elexicon is a member of the EDA please provide the EDA fess for each your 2020 – 2025 actuals and the forecast fees for 2026 and 2027.

4.0 -VECC -40

Reference: Exhibit 4, Tab 1, Schedule 1, Table 2/3

- a) Please update Table 3 to include 2025 actual results.

4.0 -VECC -41

Reference: Exhibit 4, Tab 1, Schedule 1, Table 2, 3 & 4 /Schedules 2,3,4,5,6 Tables 1,

- a) Please separate each area (e.g. Table 1 “Asset Planning and System Engineering”) into labour and non-labour related costs. Please add two new rows: i) showing the proportion of Labour/Non-Labour-Capital (ratio) in each year 2020 to 2031; ii) Showing the number of FTEs (roles) in each year.

4.0 -VECC -42

Reference: Exhibit 4, Tab 1, Schedule 1, page 34

“Despite nearly doubling its net capital expenditures in the historical period and responding to increasing levels of policy activity and sector change, Elexicon’s workforce increased by only 25% in the same period, underscoring the utility’s ability to manage significant growth and complexity with limited staffing increases through cost management and efficiency measures.”

- a) How does Elexicon know what the relationship is between internal workforce and capital expenditures? That is, while the Utility is proposing a larger capital program than in the past, it is not clear in the evidence why this necessarily results in a need for more human resources since there is no intuitive relationship between capital dollars spent and the need for internal labour (some projects being less labour intensive than others and some project being completed by contracted resources). Why does a larger capital program necessarily argue for a larger FTE during the proposed rate plan? Put otherwise, how is the referenced statement meaningful in the absence of an analysis that considers these types of conflating factors?

4.0 -VECC -43

Reference: Exhibit 4, Tab 1, Schedule 1, page 29

“Elexicon developed benchmarking from RRR data and selected a peer group with relatively comparable customer size: Alectra Utilities Corporation, Burlington Hydro Inc., ENWIN Utilities Ltd., Elexicon Energy Inc., Enova Power Corp., GrandBridge Energy Inc., Hydro Ottawa Limited, London Hydro Inc., Oakville Hydro Electricity Distribution Inc., Toronto Hydro-Electric System Limited.” (emphasis added)

- a) Did Elexicon include itself as part of the “Peer Group Averages” shown in various tables/figures in Exhibit 4? If yes, please restate Figure two showing the Peer Group average without including Elexicon.

4.0 -VECC -44

Reference: Exhibit 1, Tab 4, Schedule 1, page 23 /Exhibit 4, pages

“Increasing requirements from the OEB on non-wires solutions, capacity maps and reliability reporting also added incremental new requirements for the team to address. The utility required additional staff to supplement its available internal system planning expertise, improve Elexicon’s load forecasting and its asset management and planning processes, ensure the oversight of external vendors, meet the demand for system enhancements to address capacity constraints, address new OEB work requirements, and improve project delivery of capital and maintenance work in line with its investment plans.”

a) Please provide the FTE increment related to the above explanation.

4.0 -VECC -45

Reference: Exhibit 4, Tab 3, Schedule 2

Table 6: Finance Segment Historical, Bridge and Forecast Costs 2020-2031

	Actual					Bridge		Forecast					
Years	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	CAGR
Segment Costs (\$M)	3.43	3.67	3.92	3.52	3.59	4.12	4.69	5.25	5.53	5.97	6.33	6.47	5.9%
Variance (\$M)		0.24	0.25	-0.40	0.07	0.53	0.57	0.56	0.29	0.44	0.36	0.14	
Variance (%)		7.1%	6.8%	-10.2%	1.9%	14.8%	13.9%	11.9%	5.5%	7.9%	6.0%	2.3%	

“This segment is primarily comprised of internal labour and external consulting expenses.”

“In addition, support to internal segments for business planning and fiscal month-end reporting required incremental effort during the historical period as segments across the company were facing challenges since the merger, such as prioritizing increasing workloads under constrained budgets and staffing transitions, including retirements and new hires across various levels.”

- a) Given that the merger transactions have since passed and that there is no inherent relationship between the size of finance funding and the need for additional resources to manage it (another explanation provided for the large increase in this segment) what are the reasons for the inordinately large increase in this area?
- b) Please provide a list of FTEs and job descriptions providing services in this area for each year 2020 to 2031.
- c) Please provide Table 6 divided by into three categories of costs: internal labour, external consulting, other non-labour costs. For each year’s consulting costs please specific the activity forecast to be engaged in which requires consulting costs.

4.0 -VECC -46

Reference: Exhibit 4, Tab 1, Schedule 6

Table 8: Regulatory Affairs Segment Historical, Bridge and Forecast Costs 2020-2031

Years	Historical					Bridge		Forecast					CAGR
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	
Regulatory Costs (\$M)	0.70	0.86	0.61	2.19	1.48	1.41	1.84	2.05	2.32	2.38	2.44	2.50	12.2%
Variance (\$M)		0.16	-0.25	1.58	-0.71	-0.06	0.42	0.21	0.28	0.05	0.06	0.06	
Variance (%)		22.5%	-29.3%	261.0%	-32.6%	-4.2%	30.0%	11.3%	13.5%	2.3%	2.6%	2.4%	
OEB Cost Assessments (\$M)	0.69	0.67	0.74	0.84	0.97	1.00	1.00	1.00	1.00	1.00	1.00	1.00	3.5%
Variance (\$M)		-0.02	0.08	0.09	0.13	0.04	0.00	0.00	0.00	0.00	0.00	0.00	
Variance (%)		-3.0%	11.3%	12.2%	15.7%	3.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
LEAP (\$M)	0.09	0.09	0.09	0.09	0.24	0.32	0.32	0.33	0.34	0.34	0.35	0.36	13.6%
Variance (\$M)		0.00	0.00	0.00	0.15	0.08	0.00	0.01	0.01	0.01	0.01	0.01	
Variance (%)		1.1%	-0.6%	0.0%	171.9%	34.2%	0.0%	1.9%	2.0%	2.0%	2.0%	2.0%	
Regulatory One-Time Costs (\$M)								1.27	1.27	1.27	1.27	1.27	
Segment Total Costs (\$M)	1.48	1.62	1.44	3.12	2.69	2.74	3.17	4.65	4.93	4.99	5.06	5.12	12.0%
Variance (\$M)		0.14	-0.18	1.68	-0.43	0.06	0.42	1.48	0.28	0.06	0.07	0.06	
Variance (%)		9.3%	-10.9%	116.3%	-13.8%	2.1%	15.5%	46.8%	6.1%	1.2%	1.4%	1.3%	

“Given the difficulty in forecasting these assessments accurately, Elexicon proposes to continue using Account 1508 OEB Other Regulatory Assets - Sub-Account - OEB Cost Assessment beyond the 2027 rebasing year.”

- Please provide the actual 2025 OEB Assessment invoice costs.
- Please revise Table 8 to show any OEB costs other than annual assessment costs, separately (e.g. any section 30 costs or other regulatory invoice costs).
- Please explain how the 2026 to 2031 assessment cost amount was forecast.
- Is Elexicon aware of any other OEB regulated utility which has had approved an on-going regulatory cost assessment variance account?

4.0 -VECC -47

Reference: Exhibit 4, Tab x, Schedule x

Table 11: Legal and Corporate Secretariat Segment Historical, Bridge and Forecast Costs 2020-2031

Years	Historical					Bridge		Forecast					CAGR
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	
Segment Costs (\$M)	2.55	3.03	3.42	3.58	3.54	4.97	5.89	6.89	7.38	8.32	8.72	9.13	12.3%
Variance (\$M)		0.48	0.39	0.15	-0.04	1.43	0.92	1.00	0.50	0.94	0.39	0.41	
Variance (%)		18.6%	13.0%	4.5%	-1.1%	40.6%	18.5%	16.9%	7.2%	12.7%	4.7%	4.7%	

“Elexicon’s governance team, including the Office of the CEO, resides within this segment. The governance function provides executive leadership and strategic

direction for Elexicon internally to staff and governance committees, and accountability externally to stakeholders, shareholders and the Elexicon Energy Board of Directors.”

- a) Please provide a modified Table 11 which shows the Office of the CEO costs separate from all other costs.

5.0 COST OF CAPITAL (EXHIBIT 5)

5.0-VECC-48

Reference: Exhibit 5, Tab 1, Schedule 2

Historical ROE

Year	Deemed ROE	Achieved ROE	Difference
2020	9.43%	6.80%	-2.63%
2021	9.43%	6.87%	-2.56%
2022	9.43%	4.86%	-4.57%
2023	9.43%	5.15%	-4.28%
2024	9.43%	5.39%	-4.04%

- a) Please provide the 2025 achieved ROE.

5.0-VECC-49

Reference: Exhibit 5, Tab 1, Schedule 1, pg. 2 /Schedule 2

“In Q3 of 2025, the majority of Elexicon’s shareholders agreed to convert \$62 million in existing promissory notes into shareholder equity, representing a substantial equity injection into the distribution utility.”

- a) Please provide the referenced agreements of debt-to-equity conversation. If not addressed in the agreements please explain the change from a promissory note of \$71,925,942 to \$17,974,000 that occurs between 2024 and 2025. Specifically, is the amended agreement provided at Schedule 2 (PDF page 17) the only written agreement changing the terms of the lending agreement and injection of equity into Elexicon?
- b) Please provide the forecast actual debt to equity ratio as of January 1, 2027 and December 31, 2027.

5.0-VECC-50

Reference: Exhibit 5, Appendix 2-OA

- a) In 2025 Elexicon had a “TD Interest rate swap loan” (Row 4) in the principal amount of \$33,389,470 at 5.096% and a 5-year term with a start date of 10/03/2023. In 2026 (again Row 4) shows the same loan principal (i.e. \$33,389,470) and same term and start date but with the lender now listed as RBC and at a rate of 5.176%. Please explain what appears to be the same loan but with a different lender at a different rate.

5.0-VECC-51

Reference: Exhibit 5, Tab 1, Schedule 2

- a) Please explain the reason(s) for the difference as between the principal of \$15 million shown in the agreement at Schedule 2 between Elexicon Energy and Elexicon Corporation and the \$13 million principal shown in Appendix 2-OB for what appears to be the same debt.

6.0 REVENUE REQUIREMENT (EXHIBIT 6)

6.0-VECC-61

**Reference: Exhibit 6, Tab 3, Schedule 1, page 1
Appendix 2-H**

- a) Please provide an updated version of Appendix 2-H that includes: i) the 2025 actuals for each USoA, ii) the 2026 year-to-date actuals for each USOA and iii) the 2025 year-to-date actuals for the same period as used for item (ii).

6.0-VECC-62

Reference: Exhibit 6, Tab 3, Schedule 1, pages 1-2

- a) Please provide a schedule that sets out for each the specific service charges the actual volumes and revenues for the years 2024 and 2025 as well as the forecast volumes and revenues for 2026 to 2031.
- b) For each of the specific service charges please explain the basis for the volumes forecasted for 2026-2031.
- c) The Application states: “The historical variance between 2023 and 2024 actuals from \$1.4M to \$3.3M is primarily due to a change in the provision of the account to record the lost revenues associated with the elimination of the Collection of Account charge consistent with OEB decision.” The associated footnote refers to OEB Decision EB-2021-0009. Please provide the specific reference from this Decision that addresses the elimination of the Collection of Account charge.

6.0-VECC-63

Reference: Exhibit 6, Tab 3, Schedule 1, pages 2-3

Preamble: The Application states:

“2024 – 2027 Variance Explanation:

The revenues from late payment charges are expected to increase by \$0.1M, in accordance with the growth of Elexicon’s customer base and subsequent increase in unpaid account balances.

2027 – 2031 Variance Explanation:

The revenues from late payment charges are expected to increase by \$0.1M, in accordance with the growth of Elexicon’s customer base and subsequent increase in unpaid account balances.”

- a) In forecasting revenues for Late Payment Charge, as well as making an allowance for the growth in Elexicon’s customer base, was any allowance made for the fact distribution rates are increasing over the forecast period?
- b) If not, please provide an updated forecast of revenues from Late Payment Charges that also incorporates the annual expected increase in distribution rates.

6.0-VECC-64

Reference: Exhibit 6, Tab 3, Schedule 1, pages 3-4

- a) Does USoA 4210 include revenues from sources other than the OEB’s approved Pole Attachment Charge? If so, please provide a schedule that breaks out the sources of revenue for 2024-2031 and explain the basis for the forecast revenue from each of the sources other than the OEB’s approved Pole Attachment Charge.
- b) Please provide a schedule that sets out the basis for the 2024-2031 annual revenues from Pole Attachment Charges (i.e., the annual rate used and the annual number of poles).

6.0-VECC-65

Reference: Exhibit 6, Tab 3, Schedule 1, pages 4-6

- a) Please provide the basis for the 2025-2031 forecast values for each of the following USoAs: i) 4325, ii) 4330, iii) 4375, iv) 4380, v) 4390 and vi) 4405.

7.0 COST ALLOCATION (EXHIBIT 7)

7.0-VECC-66

Reference: Exhibit 7, Tab 1, Schedule 1, page 4
Exhibit 7, Cost Allocation Model, I4 BO ASSETS Tab

- a) Please explain why only 40% of the Underground Conductors and Devices are classified as Primary when 80% of the Underground Conduit is classified as Primary.

7.0-VECC-67

Reference: Exhibit 7, Tab 1, Schedule 1, pages 4-5

Preamble: The Application states:
“As per Elexicon’s Conditions of Service, all General Service customer classes are responsible for installing and paying for their own service connection assets. Elexicon does not own or perform any maintenance work on customer-owned services.”

- a) Please confirm that Street Lighting, Sentinel and USL customers are also responsible for installing and paying for their own service connection assets.
- b) Please confirm that Elexicon does not own any of the connection assets paid for by non-Residential customers.

7.0-VECC-68

Reference: Exhibit 7, Tab 1, Schedule 1, pages 5-6

- a) What was the basis for the higher weighting of 1.2 applied to:
 - i. All GS and LU customers in the case of Customer Service Expense?
 - ii. All GS>50 and LU customers in the case of the Billing Department?

7.0-VECC-69

Reference: Exhibit 7, Tab 1, Schedule 1, pages 6-8

- a) Do all GS and LU customers only have one meter that is owned by Elexicon? If not, how many additional meters are owned by Elexicon for each of the GS and LU customer classes?
- b) Do any GS or LU customers themselves own meters that are read monthly by Elexicon? If yes, please identify the additional number of meters read for each customer class.

7.0-VECC-70

Reference: Exhibit 7, Tab 1, Schedule 1, pages 17-20

Preamble: The Application states:
“Elexicon held an engagement with the intervenors that were party to Veridian’s 2014 settlement agreement on July 23, 2025. In the engagement Elexicon provided an overview of the Seasonal Residential rate class, provided an assessment that the density factors should be updated, and presented a plan for updating the density factors. Elexicon has updated the density weighting factors in its 2027 CA model according to the methodology used to derive the density factors described below, consistent with the planned methodology presented to intervenors.”

- a) During the July 23, 2025 engagement with intervenors were any concerns raised regarding Elexicon’s proposed methodology? If yes, what were they and how were they addressed in the subsequent methodology used to establish the proposed density factors?

7.0-VECC-71

Reference: Exhibit 7, Tab 1, Schedule 1, pages 19-20

Preamble: The Application states:
“The density factors are calculated using the following four steps:

- 1. The Gravenhurst service area is divided into a Rural service area and an Urban service area based on existing area definitions used by Elexicon. The rural service area is used to represent the areas Seasonal Residential customers are located.*
- 2. The quantity of poles and transformers and the length of overhead and underground conductors that are within the shortest feeder path from the customer to the closest supply point were determined for customers within the Rural Gravenhurst service area and for Elexicon’s total service area.*
- 3. The average quantity of poles and transformers and the length of overhead and underground conductors that supply customers in the Rural service area and Elexicon’s remaining metered customers are calculated.*
- 4. The density factors are derived as the ratio between the average customer in the Rural Gravenhurst service area and the average Elexicon customer across its service area, for each type of asset.”*

- a) Please provide the “existing area definitions used by Elexicon” to determine the rural service area and the urban service area.

- b) For the rural service area, please provide: i) the total number of metered customers and ii) the total number of Seasonal Residential customers.
- c) For the urban service area, please provide: i) the total number of metered customers and ii) the total number of Seasonal Residential customers.
- d) With respect to step #4, please explain why, for each asset type, the density factors are derived as the ratio between the average customer in the Rural Gravenhurst service area and the average Elexicon customer across its service area as opposed to being derived as the ratio between the average customer in the Rural Gravenhurst service area and the average customer in Elexicon's remaining service area (as determined in step #3).
- e) Please recalculate the updated density factors in Table 12 for each asset type based on the ratio between the average customer in the Rural Gravenhurst service area and the average customer in Elexicon's remaining service area (as determined in step #3).

7.0-VECC-72

**Reference: Exhibit 7, Tab 1, Schedule 1, page 24
Exhibit 8, Tab 1, Schedule 1, page 46**

- a) Please provide a revised version of Table 15 where: i) the Revenue to Cost Ratio for the Sentinel class is set at the status quo value, ii) for all classes with Ratios above the policy range the proposed Ratio equals the upper end of the range and iii) the Ratios for Residential, Seasonal Residential and Large Use are set at a common value.
- b) Please provide the bill impacts for the Sentinel class if the Revenue to Cost Ratio is set at the status quo value.

7.0-VECC-73

Reference: Cost Allocation Model, Tabs 6.2 (Customer Data) and I8 (Demand Data)

- a) In Tab 6.2, for the GS<50 class the number of Line Transformer Customers is greater than the number of Secondary Customers. However, in Tab I8, the GS<50 LTNCP4 value equals the SNCP4 value. Please reconcile.
- b) In Tab 6.2, for the GS 50-2,999 class the number of Line Transformer Customers is greater than the number of Secondary Customers. However, in Tab I8, the GS 50-2,999 LTNCP4 value equals the SNCP4 value. Please reconcile.
- c) In Tab 6.2, for the GS 3,000-4,999 class there are seven Line Transformer Customers. However, in Tab I8, the GS 3,000-4,999 LTNCP4 value for the class equals zero. Please reconcile.

8.0 RATE DESIGN (EXHIBIT 8)

8.0-VECC-74

Reference: Exhibit 8, Tab 1, Schedule 1, page 12

Preamble: The Application states:
“Ellexicon is proposing to maintain the 2027 rate class allocations for the duration of the 2028 to 2031 rebasing period. The Custom Revenue Cap Index (“CRCI”) will be applied to the prior years’ service revenue requirement with forecast other revenue removed, to determine the current year distribution revenue which is then allocated to each rate class each year from 2028 to 2031 based on the 2027 allocations. Rates are designed to recover each class’s updated base revenue requirement using the forecast billing determinants in that year according to the load forecast described in Exhibit 3.”

- a) Please confirm that maintaining the 2027 rate class allocations for the duration of the rebasing period (i.e., 2028-2031) implicitly assumes that, for each of the years 2028-2031, the cost allocation allocators for all customer classes are increasing by the same percentage.
 - i. If not confirmed, please explain why.

8.0 RATE DESIGN (EXHIBIT 8)

8.0-VECC-75

Reference: Exhibit 8, Tab 1, Schedule 1, pages 13-18

- a) With respect to Tables 11, 13, 15 and 17 please explain how the fixed charge percentages were determined each year for each of the non-Residential customer classes.
- b) With respect to Tables 19 and 20, please provide a schedule that sets out for each customer class: i) the monthly fixed charges for each of the years 2027-2031 and ii) the year annual increase in the charge from that in the previous year.
- c) With respect to Tables 19 and 20, please provide a schedule that sets out for each customer class: i) the variable distribution rates for each of the years 2027-2031 and ii) the year annual increase in the charge from that in the previous year.

8.0-VECC-76

**Reference: Exhibit 8, Tab 1, Schedule 1, pages 19-21
RTSR Workform, Tab 7 (Forecast Wholesale 2027)**

- a) Please provide the derivation of the forecast 2027 monthly Network Units Billed (Tab 7, Column D, Rows 19-49).
- b) Please provide the derivation of the forecast 2027 monthly Line Connection and Transformation Connection Units Billed (Tab 7 Columns H & L, Rows 19-49).

8.0-VECC-77

Reference: Exhibit 8, Tab 1, Schedule 1, page 24

- a) Please explain why, in Table 27 for each of the years 2028-2031, the increase in the Network RTSRs for each given year is not the same for all customer classes.
- b) Does the same explanation apply for Table 28 in terms of why, for each of the years 2028-2031, the increase in the Connection RTSRs for each given year is not the same for all customer classes?

8.0-VECC-78

Reference: Exhibit 8, Tab 1, Schedule 1, page 18

Preamble: The Application states:

“For each rate class there is a Network RTSR and a Connection RTSR. The RTSR Network charge recovers the UTR wholesale network service charge, and the RTSR connection charge recovers the UTR wholesale line and transformation connection charges. As a partially embedded distributor, Elexicon pays sub-transmission RTSRs to Hydro One, its host distributor, and combines these costs with UTR expenses from transmission connection points for recovery through its RTSRs.”

- a) Do any of Elexicon’s customers have load displacement generation that exceeds the capacity thresholds for gross load billing of the UTR wholesale line and transformation connection charges and HONI’s RTSR Line and Transformation Connection Service rates for ST customers?
 - i. If so, how many customers are there and are these customers’ RTSRs billed by Elexicon on a gross load basis?

8.0-VECC-79

Reference: Exhibit 8, Tab 1, Schedule 1, pages 30-34
RTSR Workform, Tab 4 and LV Charges Tab

Preamble: The Application states:
“As Elexicon is forecasting low voltage charges for the 2025 to 2031 period, the low voltage costs have been calculated using the average escalation rate of 5.7%, from Hydro One’s settlement agreement, applied to harmonized low voltage rates as described below and increases in forecasted billed volumes.”

- a) Are the 2028-2031 proposed Low Voltage Rates set out in Table 35 provided for illustrative purposes (such that they will be updated annually as part of its annual update process for 2028-203) or is Elexicon proposing that the 2028-2031 rates set out in Table 35 be approved on a final basis?
- b) Please confirm that the 5.7% is based on the average forecasted annual increase in HONI Transmission’s unit cost (i.e., revenue requirement/ MW) for the period 2023-2027 (per RTSR Workform, Tab 4, Cell AA30).
 - i. If confirmed, please explain why this is an appropriate basis for forecasting the 2028-2031 increases in the rates for LV expense which are meant to recover HONI Distribution’s ST charges.
 - ii. If not confirmed, please explain how the 5.7% was determined.

8.0-VECC-80

Reference: Exhibit 8, Tab 1, Schedule 1, pages 24-25

- a) For purposes of setting 2028-2031 rates does Elexicon propose to set the Retail Service Rates based on the Board approved rates for each year?

DEFERRAL AND VARIANCE ACCOUNTS (EXHIBIT 9)

9.0 –VECC -81

Reference: Exhibit 9, Tab 1, Schedule 1, DVA Continuity Schedule,
Tab 4

- a) What is the basis for the Distribution Revenue values used in Tab 4 (Column I)?

End of document