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April 10, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Mr. Murray,

RE: EB-2025-0312 Elexicon Energy 2027-2031 Rates - Energy Probe Interrogatories

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to the applicant. In accordance with the instructions in PO No.1 Energy Probe has ensured that its interrogatories do not duplicate any interrogatories of CCMBC.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe)
Parties to the Proceeding

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Energy Probe Interrogatories

EB-2025-0312 Elexicon Energy 2027-2031 Rates

April 10, 2026

1-EP-1

Reference: Exhibit 1, Tab 3, Schedule 1A, Page 9

Preamble: “EC wholly owns two subsidiaries (see Figure 1 below): Elexicon Energy, which distributes electricity and carries on certain solar generation activities; and Elexicon Group, an unregulated affiliate which no longer carries on business (but which previously carried on unregulated energy services businesses relating to rate switch, energy management, energy efficiency consulting, and other miscellaneous services). In 2024 and 2025 EC wound-up Elexicon Group refocusing on its regulated business. Elexicon Group will continue to exist (but not carry on business) until all outstanding wind-up matters have been finalized.”

Questions:

- a) Please describe the solar generation activities mentioned in the quoted text and explain how the OEB can be assured that Elexicon’s ratepayers are not subsidizing unregulated solar generation activities.
- b) How much MWh was generated in 2025, and will be generated in 2026 and 2027?
- c) Is the energy generated sold to IESO or is it for Elexicon’s own use?
- d) Were any employees transferred from the unregulated Elexicon Group to the regulated Elexicon Energy when Elexicon Group was wound up?

1-EP-2

Reference: Exhibit 1-3-1A, Page 11, *Use of AI in Preparation of Application*

Preamble: “Generative artificial intelligence was used to support editing, refining, and proofreading of content within this filing.”

Question: Were there any incremental cost savings due to use of AI? Please discuss.

1-EP-3

Reference: Exhibit 1, Tab 5, Schedule 1, Page 5

Preamble: By 2031 the funding gap of \$36M would represent about 18% of the total revenue requirement for that. Left unmitigated, the funding gap between Price Cap IR and Elexicon’s

investment plan would result in tens of millions of dollars of underinvestment in Elexicon's grid and operations.

Question: Please confirm that the objective of Price Cap IR is to provide the incentive to utilities to find efficiencies that would reduce the revenue requirement so that there would be no gap between rates under Price Cap IR and revenue requirement.

2B-EP-4

Reference: Exhibit 2B, Tab 3, Schedule 2, Appendix A, Page 3

Preamble: "Customer-owned generation and energy storage is already present across the service territory, and connection activity continues to increase. These resources introduce operational complexity that must be managed through enhanced visibility, voltage control, and protection coordination."

Question:

- a) Please confirm that customers who own generation and energy storage and who export into the grid impose higher costs of additional activities such as billing function, data capture, review time and settlement with the IESO.
- b) Does Elexicon charge these customers for the complexity and higher costs they impose? Please explain your answer.

2B-EP-5

Reference: Exhibit 2B, Tab 3, Schedule 2, Appendix A, Page 3 and Exhibit 1-7.

Preamble: "Feedback from Elexicon's customer engagement survey underscored strong support for investments in Grid Modernization with 73% of residential, 81% of seasonal, 71% of small business, and 88% of GS>50 kW customers indicating support for investment in this area."

Questions: Were participants in the customer engagement survey informed how much they would have to pay in rates for the cost of Grid Modernization? If the answer is yes, please file the information provided to them. If the answer is no, please explain why not.

2B-EP-6

Reference: Exhibit 2B, Tab 3, Schedule 2, Appendix A, Page 7, Figure 1

Questions:

- a) Does a Modern Grid require more conductors than a Traditional Grid? Please explain your answer.

- b) Can a wind farm be connected to a Traditional Grid?
- c) Can an EV be charged by a Traditional Grid?

2B-EP-7

Reference: Exhibit 2B, Tab 3, Schedule 2, Appendix A, Page 9, Table 2, *2027-2031 Grid Modernization Capital Investments by Program*

Questions:

- a) What do S2 Grid Enhancements stand for? Was there an S1?
- b) What does P5 OT Systems Program stand for? Were there P1, P2, P3 and P4?
- c) Please provide more information on the P5 OT Systems program by showing the cost of each of its components: OT System upgrades, ADMS/DERMs, and OT Grid Modernization.
- d) Please confirm that ADMS stands for Advanced Distribution Management System.
- e) Please confirm that DERMs stands for Distributed Energy Management Systems.
- f) What is the relationship between ADMS and DERMs? Is ADMS one of the DERMs? If the answer is yes, what are other DERMs?
- g) Does Elexicon currently have ADMS and DERMs in place in some parts of its distribution grid?

2B-EP-8

Reference: Exhibit 2B, Tab 3, Schedule 2, Appendix A, Page 9, Table 3 *Current (2025) vs. Evolving Future State*

Questions:

- a) Please confirm that FLISR stands for Fault Location Isolation and Service Restoration?
- b) Does Elexicon currently have FLISR in place in some parts of its distribution grid.
- c) Does Elexicon plan to install FLISR throughout its distribution grid?

2B-EP-9

Reference: Exhibit 2B, Tab 3, Schedule 2, Appendix A, Page 10, *Organizational Enablers of Grid Modernization*

Question: What is the impact of Grid Modernization on OM&A? Does it require additional staff or fewer staff? Please explain.

2B-EP-10

Reference: Exhibit 2B, Tab 3, Schedule 2, Appendix A, Page 12, Table 4, *Investments by Driver*

Questions:

- a) Please confirm that CFCIs stand for Communicating Fault Circuit Indicators.
- b) What is the relationship between FLISR and CFCIs? Are CFCIs part of FLISR?
- c) Does Elexicon currently have CFCIs in place in some parts of its distribution grid.
- d) Does Elexicon plan to install CFCIs throughout its distribution grid?

2B-EP-11

Reference: Exhibit 2B, Tab 3, Schedule 4, Page 2, *Constraints – Distribution and Upstream*

Preamble: “Elexicon will explore potential solutions to increase the available short-circuit capacity. Increasing this capacity will support future feeder expansion and enable the connection of additional DER projects.”

Question: Will Elexicon require the customers who own the additional DER projects to pay a contribution for the cost of feeder expansion that would enable their DER projects to be connected? Please explain your answer.

4-EP-12

Reference: Exhibit 4, Tab 1, Page 26

Preamble: Participation in regulatory consultations and the implementation of resulting outcomes has also required Elexicon to establish new business processes across the organization.

Question: Energy Probe participated in most of these regulatory consultations and expressed concerns about the benefits and costs of implementing some of the initiatives, such as the centralized capacity information map. Please provide more explanation on the costs of these consultations for Elexicon and describe the new business processes and their costs.

4-EP-13

Reference: Excell Spreadsheet Appendix 2K *Employee Costs*

Questions:

- a) For each year from FY20 to FY25, please provide actual headcount numbers (not FTEs) and vacancies at year end.

- b) For each year from FY20 to FY31 please provide the number of FTEs that were or will be charged to capital.

4-EP-14

Reference: Excell Spreadsheet Appendix 2N, *Shared Services and Corporate Cost Allocation*

Questions:

- a) Please describe the services that were provided prior to 2024 by Elexicon Group to Elexicon Energy for Solar Maintenance and Management.

- b) Since Elexicon Group was wound up in 2024, who is providing Solar Maintenance and Management services in 2026?