



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- CCMBC Interrogatories

Attached are the interrogatories of the Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC) to the applicant. In accordance with the instructions in PO No.1 CCMBC has ensured that its interrogatories do not duplicate any interrogatories of Energy Probe.

Respectfully submitted on behalf of CCMBC.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Catherine Swift (CCMBC)
Parties to the Proceeding

CCMBC Interrogatories

EB-2025-0312 Elexicon Energy 2027-2031 Rates

April 10, 2026

1-CCMBC-1

Reference: Exhibit 1, Tab 5, Schedule 1, Page 5, *The Need for a Custom IR Framework*

Preamble: Elexicon is proposing a Custom IR framework to meet its unique and evolving financial requirements; needs that cannot be accommodated within the parameters of the OEB's Price Cap Incentive Rate setting ("Price Cap IR") model.

Questions:

- a) Please confirm that Elexicon wants the OEB to approve higher rates than would be allowed under OEB's Price Cap Incentive Rate setting.
- b) Please confirm that if the OEB approves Elexicon's proposed Custom IR framework, manufacturers and businesses that would pay higher rates to Elexicon would have less money to invest in their companies and pay for their operating costs.

2A-CCMBC-2

Reference: Exhibit 2A, Tab 1, Schedule 1, Page 9

Preamble: "Services and Meter Assets: The increase of \$4.4 million in Services and Meters is driven by a higher volume of services installed, as well as a higher volume of smart meters installed, as a result of customer growth;"

Questions:

- a) What is Elexicon's definition of a "smart meter"?
- b) Of the meters installed during 2026, what percentage are smart meters?

2A-CCMBC-3

Reference: Exhibit 2A, Tab 1, Schedule 1, Pages 19 and 20 and Tab 6, Schedule 1, Pages 1 to 3

Preamble: “TS Primary above 50: The increase of \$34.8 million relates to the transfer of Seaton TS from account 1508 to account 1815”.

Questions:

- a) Please confirm that Account 1508 is Other Regulatory Assets.
- b) Why was Seaton TS in Account 1508?
- c) Is Seaton TS currently in service?

2A-CCMBC-4

Reference: Exhibit 2A, Tab 6, Schedule 1, page 5, Table 9, *Details of Cost Variance*

Question: The information in the table indicates that the OEB approved budget included \$700,000 for HWY 2 BRT Switchgear that was not spent. Please explain why it was not spent.

2B-CCMBC-5

Reference: Exhibit 2B, Tab 3, Schedule 1, Page 29

Preamble: “In alignment with the OEB’s Vulnerability Assessment and Storm Hardening (VASH) framework, Elexicon will identify areas within the grid for strategic investment opportunities to modernize and harden the grid to mitigate risks and customer impacts.”

Question: Are there any proposed capital projects that are supported by the OEB’s VASH framework analysis in this application? If the answer is yes, please list them and file the respective VASH framework analysis of each one. If the answer is no, please explain why not.

2B-CCMBC-6

Reference: Exhibit 2B, Tab 3, Schedule 2, Pages 55-63, Figures 24-32

Question: Please refile Figures 24-32 showing 2025 actual peak loads.

3-CCMBC-7

Reference: Exhibit 3, Tab 1, Schedule 1, Page 1, Table 1 *Forecast Consumption, Demand, and Customers*

Question: Please add two columns to Table 1: Revenues at Current Rates, and Revenues at Proposed Rates.

3-CCMBC-8

Reference: Exhibit 3, Tab 1, Schedule 1, Appendix A *Elexicon 2027-2031 Customer and Load Forecast (Power Advisory Report)*

Questions:

- a) Did Power Advisory consider the impact on the load forecast of customers who generate power for their own use under the ICI program? If the answer is yes, please explain how. If the answer is no, please explain why not.
- b) Did Power Advisory consider the impact on the load forecast of customers who own exporting DERs? If the answer is yes, please explain how. If the answer is no, please explain why not.

3-CCMBC-9

Reference: Exhibit 3, Tab 1, Schedule 1, Appendix A, *Elexicon 2027-2031 Customer and Load Forecast (Power Advisory Report)*, Page 116, *Forecast Large Additions*

Preamble: “Elexicon is forecasting significant growth its General Service classes and Large Use rate class in the 2027 to 2031 rate period. Elexicon has estimated a material increase in billed loads from new customers additions beyond what is forecast based on historical volumes and trends.”

Question: Does Power Advisory expect that this significant increase in billed loads of new customers will generate sufficient revenues to cover the costs of serving these customers and result in greater earnings for Elexicon? Please discuss.

4-CCMBC-10

Reference: Exhibit 4, Tab 1, Schedule 1, Page 22, *Continuing Investments in Grid Modernization*

Preamble: “Operational technologies (OT) that facilitate real-time communication, monitoring, and control of the electrical grid are essential to restoring reliability performance and reducing manual intervention, while also preparing the grid for future advancements and growing expectations of DER deployment.”

Question: Since investments in OT reduce manual intervention, is there a net saving in OM&A from OT investments? If the answer is yes, where can it be seen in evidence in this case? If the answer is no, please explain why not.

4-CCMBC-11

Reference: Exhibit 4, Tab 1, Schedule 5, Page 1, Table 1, *Summary of Total Customer Care Program Costs* and Pages 35 and 36

Question: Please explain how the forecasts of the increase in Metering and Wholesale Settlements from \$3.55 million in 2027 to \$5.25 million in 2028 followed by a decline to \$4.25 million in 2029 were calculated.

4-CCMBC-12

Reference: Exhibit 4 - Tab 1 Schedule 6, Appendix A, *Dx NEXT Project Summary*

Questions:

- a) Please list what systems and resources, including computer hardware, real estate, and personnel are planned to be replaced by the cloud-based CIS/ERP ("Dx NEXT") once fully operational, and the costs for operating those resources in 2024 and 2025, including electricity, heating/cooling, and maintenance costs associated with the systems and resources.
- b) Please list where the systems and resources to be replaced by Dx NEXT are physically located.
- c) Will there be a transition period where both Dx NEXT and the systems and resources it replaces will both be operating at the same time? If so, please describe how that transition period will function, including whether any legacy systems and resources will be shutdown/retired in stages.
- d) Once Dx NEXT has fully replaced the legacy systems and resources, please list what, if any, of those systems and resources will be repurposed for other uses.
- e) If the legacy systems and resources are to be no longer operated, please list the cost savings of no longer having to operate those systems and resources. How will those cost savings be passed on to ratepayers?
- f) Please describe any impacts on staffing FTEs that are currently allocated to operate and maintain the systems and resources to be replaced by Dx NEXT once Dx NEXT has fully replaced those systems and resources. How many FTEs currently allocated to the systems and resources to be replaced by Dx NEXT will remain to operate and maintain Dx NEXT, how many will be reallocated to other projects or divisions within Elexicon, and how many will be eliminated?
- g) Is there expected to be a reduction in FTEs because of the transition to Dx NEXT? If so, what is the estimated reduction in FTEs?