April 23, 2026

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board ("**OEB**")
2300 Yonge Street, Suite 2700
P.O. Box 2319
Toronto, ON M4P 1E4

Re: Next Steps on the Regulatory Treatment of Local Electricity Demand-Side Management (Stream 2) Programs (EB-2025-0156)

CCIC Written Comments on Proposed Updates to Non-Wires Solutions Guidelines

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Dear Mr. Murray,

We write on behalf of the Canadian Charging Infrastructure Council | Conseil canadien de l'infrastructure recharge ("**CCIC**") in respect of the above-noted OEB proceeding. CCIC appreciates the opportunity to comment on the Ontario Energy Board's ("**OEB**") proposed updates to the Draft Non-Wires Solutions Guidelines (the "**Guidelines**") and Appendix for Stream 2 local electricity demand-side management ("**eDSM**") programs.

About CCIC and its Practical Experience with eDSM

CCIC is a coalition of organizations across the EV charging value chain. Its members collectively own, operate, or support over half of Canada's public EV charging stations and numerous private residential and commercial charging stations in Ontario. Many of these stations are networked, giving them significant potential to support eDSM by managing system and distribution grid impacts.

As noted in CCIC's November 13, 2025 submission, CCIC sees a significant opportunity for eDSM in Ontario as EV adoption accelerates. Ontario currently relies largely on passive managed charging (such as time-of-use and ultra-low overnight rates to influence customer behaviour). However, as recognized in the IESO's July 2025 Technical Paper on Electric Vehicles, long-term system efficiency and reliability will increasingly depend on *actively* managed charging, where charging is curtailed in response to real-time or forecasted grid needs.[1]

[1] *See* *IESO Demand & Conservation Planning Technical Paper: Electric Vehicles* (July 2025) at 2-3.

CCIC members already deploy and operate networked charging infrastructure capable of delivering these capabilities. These include advanced electrical load management solutions that can adjust energy delivery in real time; fleet charging management systems that integrate with fleet, site-energy, and utility systems through APIs; and energy management functionality that dynamically controls and shifts EV charging load across ports and sites to reduce peak demand and support participation in demand response programs.

The effectiveness of these capabilities is often improved when eDSM functionality is considered at the point of technology adoption. Embedding managed-charging capabilities when customers select and install charging infrastructure, whether through requirements, incentives, or program structures, can help ensure that demand-side management is built into deployment from the outset. At the same time, CCIC recognizes that existing infrastructure can also present highly cost-effective opportunities, particularly for fleets where charging management systems may be implemented on existing assets. Stream 2 program design should therefore support both new deployments and cost-effective upgrades to existing charging infrastructure.

The Stream 2 framework presents a critical opportunity to enable the next phase of eDSM in Ontario. CCIC's comments are grounded in this practical experience and are directed at ensuring that the proposed framework can capture the value of EV charging and similar technology-enabled demand-side resources.

(1) CCIC Past Participation in eDSM Process

CCIC has actively participated in the development of the Stream 2 framework. In past submissions, CCIC supported streamlined regulatory pathways for program approval; reliance on standardized assumptions (*e.g.*, the IESO's *Measures and Assumptions List*, or "**MAL**"); and meaningful participation by third-party, technology-enabled solution providers. In its previous submission, CCIC flagged a concern that requiring a full OEB panel review for every individual eDSM initiative would impose undue constraints on local distribution companies ("**LDCs**"), third-party suppliers, and the OEB, ultimately increasing costs to ratepayers and delay program rollouts.

CCIC continues to support the overall direction of the proposed framework, subject to the clarifications and refinements outlined below.

(2) CCIC Suggests Endorsing the Role of Third Parties in Program Design and Delivery

CCIC recommends that the OEB, in the Guidelines and Appendix, expressly endorse third-party participation as an appropriate and encouraged feature of Stream 2 eDSM program design and delivery.

Third-party providers can support eDSM programs through technology platforms, managed-charging capabilities, customer relationships, implementation support, and operational data. In the EV charging context, these capabilities may include load management software, fleet charging systems, demand response functionality, and tools that allow charging load to be shifted, curtailed, or optimized in response to local grid needs.

For instance, BC Hydro's multifamily charging pilot illustrates how third-party participation can enhance eDSM delivery.[2] The pilot uses third-party charging infrastructure and distributed energy resource management system ("DERMS") capabilities to integrate multi-tenant EV chargers into an active demand response model, allowing charging load to be adjusted to help manage grid demand. This demonstrates that third parties can do more than supply equipment: they can provide the software, communications capability, customer interface, and operational data needed to make eDSM programs effective in practice.

CCIC supports preserving flexibility in how utilities engage third-party providers, and recognizes that the Guidelines, as drafted, promote such flexibility. However, CCIC recommends that this endorsement be reflected in the program delivery model requirements, so that LDCs are encouraged to identify whether and how third-party capabilities can support cost-effective program delivery and ratepayer value.

This clarification would help ensure that Stream 2 programs can draw on existing market expertise, accelerate deployment, and better capture the value of technology-enabled demand-side resources.

[2] Nicholas Sokic, "SWTCH, AutoGrid integrate 250 EV chargers in demand response program," SustainableBiz, February 17, 2023, https://www.sustainablebiz.ca/swtch-autogrid-integrate-250-ev-chargers-in-demand-response-program/; confirmed by CCIC member verification that the utility referenced is BC Hydro.

(3) CCIC Supports the Adoption of Thresholds Triggering OEB Panel Review and Approval by Delegated Authority Where Those Thresholds are Not Met

Section 1.3 of the Appendix (Approval Authority) introduces defined triggers for when Stream 2 applications will proceed by delegated authority ("**DA**") or by full OEB Panel review. The provision identifies six criteria, including program scale, higher funding levels, material bill impacts, or non-standard mechanisms.[3]

CCIC endorses the approach of triggering OEB Panel review only where the program requires it. In previous submissions, CCIC noted that requiring full Panel review for *all* Stream 2 applications could create unnecessary delay and administrative burden without corresponding benefits to ratepayers. Defined triggers for full Panel review appropriately balance regulatory oversight with timely program deployment.

CCIC understands that these criteria are intended to operate as screening factors to inform the Chief Commissioner's determination. In practice, this should create a more predictable approval pathway, whereby applications that do not trigger the specified thresholds proceed through DA.

However, Section 1.3 does not clearly establish this as the default outcome. In an effort to clarify the approval process and provide LDCs with certainty, CCIC recommends that the OEB:

1. confirm that the six criteria in Section 1.3 operate as threshold tests and that applications not meeting any conditions for Panel review will presumptively proceed by DA; and
2. clarify whether applicants may bring forward additional considerations to support their request for DA–clarifying the types of considerations, beyond the six listed criteria, which would be relevant to the Chief Commissioner's determination.

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CCIC appreciates the opportunity to provide these comments and looks forward to continued engagement with the OEB and other stakeholders as the eDSM framework is further developed and implemented.

Yours truly,

Colin Carruthers, Gilbert's LLP (counsel for CCIC)

[3] Ontario Energy Board, *Appendix to Non-Wires Solutions Guidelines: Stream 2 Local eDSM Programs (DRAFT)*, EB-2025-0156, March 31, 2026, Section 1.3 (Approval Authority).