

April 24, 2026

Ontario Energy Board

Attn: Registrar

Re: EB-2025-0156 - Comments on Draft Amendments to the Non-Wires Solutions Guidelines and Draft Appendix for Stream 2 Local eDSM Programs

Hootwater appreciates the opportunity to comment on the Ontario Energy Board's draft amendments to the Non-Wires Solutions Guidelines and the draft Appendix for Stream 2 local electricity demand-side management programs.

Overall, we support the direction reflected in the draft materials. In our view, the proposed Stream 2 framework is an important step toward enabling electricity distributors to pursue practical, cost-effective local demand-side solutions that can deliver local distribution benefits, broader system benefits, and customer savings.

Hootwater is a Canadian company developing and operating residential electric water-heater load shifting technology. In Ontario, we have been operating electric water-heater load control in Oakville in collaboration with Oakville Hydro and Mattamy Homes. That work has shown that residential electric water heating can be controlled reliably to reduce peak demand and shift load away from peak periods while maintaining customer comfort.

Based on our Oakville results, we have shifted >95% of water-heating load out of targeted peak windows for a one-hour event and 75% for a four-hour event. We have also achieved hourly-average peak reduction of 0.6 to 0.7 kW per tank during a one-hour event and 0.35 to 0.5 kW per tank during a four-hour event, with consistent results at similar hours. On a 5-minute basis, coincident peak reductions were up to 2x the hourly average. Just as importantly, comfort performance has been very strong, with no opt-outs to date.

We believe this type of resource is well aligned with the intent of Stream 2. Residential electric water-heater load shifting can provide meaningful Ontario system benefits, including repeatable daily peak reduction, and can also support local distribution objectives. We encourage the OEB to ensure that the final guidance clearly accommodates residential electric water-heater load shifting within Stream 2 where it is used to address an identified local distribution need while also delivering broader system value.

We also support the draft framework's reliance on evidentiary requirements and measurement and verification. For newer distributed energy resources and demand-side technologies, it is important that the final framework continue to allow measures to proceed where they are supported by credible field data and third-party validation.

We would also encourage the OEB to ensure that the final framework works in a practical way for residential programs delivered with third-party partners and customer incentives. In our experience, visible customer value is an important part of program participation and persistence. Our Oakville experience has shown meaningful homeowner savings, including Time-of-Use savings and a utility bill credit, alongside measurable system benefits.

Finally, we note that Hootwater is a Canadian company and that our product pathway includes OEM-integrated product manufacturing in Canada. As Ontario moves to implement Stream 2, there is value in ensuring that the framework can accommodate practical, scalable solutions that are already being developed, demonstrated, and validated in Ontario and Canada.

Thank you for the opportunity to comment. We would be pleased to continue the dialogue with the OEB, distributors, and the IESO as this framework is finalized and implemented.

Sincerely,



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