

1                                   **RESPONSES TO QUINTE MANUFACTURERS INTERROGATORIES**

2

3   **INTERROGATORY 1-QMA-1**

4   Reference:

5   E1/T7/S1 pp. 1-3, and Appendix A

6

7   Preamble:

8   Throughout the pre-filed evidence and with respect to the results of the customer engagement  
9   work undertaken by the Innovative Research Group on behalf of Elexicon Energy Inc. (“Elexicon”),  
10   issues regarding the need for reasonable rates, reliable service, severe weather impacts, among  
11   others, are common concerns for customers.

12

13   Question(s):

14

15   1) Given the number (10) of discontinuous and geographically diverse service territories  
16   that Elexicon Energy has, please explain the method the utility uses to ensure its  
17   annual business activities accurately reflect the needs and preferences of its customers in each of  
18   those territories.

19

20   2) Please explain how changing and emerging risk management concerns (eg.,  
21   increasing extreme weather events) in each service territory are being addressed by Elexicon.

22

23   **RESPONSE:**

24       1) Elexicon Energy ensures that its annual business activities reflect the needs and  
25       preferences of customers across its ten service areas through a combination of centralized  
26       planning and localized input.

27

28       Elexicon’s customer engagement process helped identify customer needs in preferences.

29       During the first phase of customer engagement Elexicon undertook to understand the

1 needs and preferences of customers from across the service areas. Insights on customer  
2 priorities, service expectations, and emerging needs within communities were gathered  
3 through focus groups and surveys. These insights are supplemented by analysis of  
4 operational data, including reliability performance, outage trends, and service requests,  
5 which are reviewed at a local level to identify area-specific requirements which formed the  
6 basis of the investment plan in the application. The resulting investment plan and  
7 associated rate impacts was tested with customers in phase two that engagement. As  
8 detailed in Appendix 4 of the Innovative Report (provided in Appendix A of Exhibit 1 – Tab  
9 7 – Schedule 1), the methodology ensured that the sample was weighted to match the  
10 make-up of Elexicon’s customer base.

11  
12 As described in Exhibit 1 – Tab 7 – Schedule 2, Elexicon also leverages its regional presence  
13 and relationships with municipal officials and local stakeholders to obtain direct feedback  
14 on community priorities and planned growth. This ensures that local considerations, such  
15 as development patterns and infrastructure needs, are incorporated into planning.

16  
17 Where appropriate, activities and investments are prioritized or tailored to address the  
18 distinct needs of services areas, while maintaining regulatory obligations.

19  
20 2) Elexicon has a robust Enterprise Risk Management (“ERM”) program that actively  
21 identifies, assesses, and manages risk across the organization. Through this program,  
22 material risks are identified, assessed, and treatment plans are developed and monitored  
23 on an ongoing basis to ensure the organization focusing on and appropriately managing the  
24 most material risks to achieve positive outcomes such as resiliency and continuity of  
25 service. Examples of current risks include, emergency management and business continuity  
26 and sufficiency of distribution system capacity.

27  
28 Elexicon’s ERM program and proactive planning demonstrate Elexicon’s strategic focus on  
29 strengthening system reliability, capacity, and resilience in the face of changing risk

1           landscapes, including challenges posed by severe weather and broader economic and  
2           environmental factors.



1 statement is of a general nature and is not specific to any customer class or geographic location  
2 within Elexicon's service territory. To expand on this statement, the Customer and Generation  
3 Connections and System Expansion investment programs include customer-driven work, for  
4 which the timing and scope of work may change for reasons outside of Elexicon's control. This  
5 results in variability in contribution levels from year to year, which is a function of the economic  
6 evaluation methodology which must be applied to new and modified connections in accordance  
7 with the Distribution System Code.

8

9 2) See response to part 1 above.

10

11 3) Yes, the dynamic nature and volatility of demand-driven projects and associated customer  
12 contributions is a recurring consideration for management when planning annual capital  
13 expenditures. Variations in project timing and contribution amounts introduce forecasting  
14 uncertainty, which can influence year-over-year capital expenditure profiles. Elexicon manages  
15 this uncertainty by basing forecasts for customer connections and system expansions on a  
16 reasonable assessment of in-flight projects, historical trends and forward-looking demand  
17 drivers, while recognizing that adjustments to capital plans may be required as project details  
18 and timing evolve.

1                                   **RESPONSES TO QUINTE MANUFACTURERS INTERROGATORIES**

2

3   **INTERROGATORY 1-QMA-3**

4

5   Reference:

6   E1/T8/S1 Appendix A2 - Management Discussion and Analysis Report, pp. 23

7

8   Preamble:

9   Elexicon has a proactive Enterprise Risk Management (“ERM”) program that was established in  
10 2021 with an aim to prevent or mitigate identified organizational risks as discussed in the  
11 Management Discussion and Analysis Report. The Innovative Research Group identified in its  
12 report certain key concerns of Elexicon’s customers such as distribution grid reliability and  
13 hardening to withstand severe weather events, cyber security and others.

14

15   Question(s):

16

17   1) In the event of a catastrophic situation impacting Elexicon’s operations in whole (i.e.,  
18 enterprise-wide) or in part by service territory please explain how the utility will continue to  
19 operate during and after an unplanned disruption?

20

21   2) ERM plans and continuity plans work together to protect the value of the business or enterprise.  
22 Does Elexicon incorporate business continuity planning in managing its risk environment in the  
23 event of an unplanned disruption? If there is no business continuity plan please explain why not. If  
24 there is a business continuity plan please provide a copy.

25

26

27   **RESPONSE:**

28       1) Elexicon Energy leverages a range of tools and best practices to prepare for and respond to  
29       large-scale operational disruptions. Elexicon’s approach is primarily documented in the

1 Power System Restoration Plan (PSRP), which is submitted annually to the IESO. The PSRP  
2 outlines how internal teams reorganize into a dedicated Incident Management Team (IMT)  
3 structure, drawing on emergency management best practices, including the Ontario  
4 Incident Management System framework developed by Emergency Management Ontario.  
5 The PSRP integrates the key systems, tools, and protocols that enable Elexicon to contain,  
6 control, and resolve interruptions in a safe and efficient manner. While the plan's primary  
7 focus is grid emergencies, as these represent the most frequent and operationally  
8 significant disruptions Elexicon must manage, the underlying framework is built on all-  
9 hazards principles, meaning it can be applied effectively across a broad range of corporate  
10 disruptions beyond grid events.

11 In advance of or following a disruption, Elexicon activates its IMT by reorganizing key  
12 decision-makers and subject matter specialists into pre-assigned roles. This pre-assignment  
13 structure enables rapid activation in quick-onset events, and multi-day scheduling ensures  
14 depth and continuity for long-duration incidents. The IMT operates with clear lines of  
15 accountability, reporting to executive leadership and ultimately to the Board of Directors.  
16 This governance structure ensures that response activities remain aligned with  
17 organizational priorities and that recovery decisions are made at the appropriate level.

18

19 2) Elexicon maintains a robust Enterprise Risk Management (“ERM”) program that identifies  
20 and monitors enterprise risks across the organization. Since 2025, Emergency Management  
21 has been identified as a top enterprise risk and is actively managed through the ERM  
22 framework. Elexicon’s business continuity planning is supported by its emergency  
23 management and business continuity capabilities, including a formal Business Continuity  
24 Plan that was developed in 2021. The Business Continuity Plan considered various  
25 scenarios, including power system restoration. These capabilities were applied successfully,  
26 for example, during the major event days experienced in 2025, supporting the safe and  
27 timely restoration of service to affected communities. As part of Elexicon’s continuous  
28 improvement, its business continuity planning will continue to be updated and refined to

1 address a broader range of operational disruptions and evolving risk considerations. A copy  
2 of the Business Continuity Plan is provided in Attachment 1 to this response.

3

4

# Business Continuity Plan Overview

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## Introduction

At Elexicon Energy we provide a critical service to our customer base and as such are responsible for ensuring that this service is available at all times. The activities involved in delivering this service are complex, and can be subject to failures and interruptions. It is our responsibility to ensure that we have plans in place to anticipate and respond to all emergency situations that could impact our business.

## What is a Business Continuity Plan?

Business continuity is the ability to continue operating our critical business operations following an unforeseen event, such as a natural disaster, a pandemic or a technology issue such as a cyber attack.

In the case of Elexicon Energy, critical business operations include:

- safe and reliable delivery of power to our customers;
- responsiveness to our customers;
- financial management;
- health and safety of our employees;
- legal and regulatory obligations;
- uninterrupted billing and collections.

A business continuity plan (BCP) is a process that outlines the potential impact of emergency situations, creates procedures to respond to them and helps us recover quickly so we can function as usual. A BCP is created in advance of any potential event and its main goals are to protect personnel and assets, and to deliver core services both during and after an emergency.

Planning does not cover every eventuality and assumes knowledgeable staff are available to respond. The BCP, therefore, is developed with the following assumptions:

- the building you work in is not available.
- qualified staff are available to recover and continue operations.
- recovery procedures are designed to extend until the crisis has been resolved (number of hours, days, weeks, etc.).
- all documents and equipment at work stations and data centers at the impacted location are not available.
- clients and other company locations have not been directly affected by the disaster.

A separate plan, the [Power Restoration Plan](#) (PRP), is designed for managing wide-spread power outages, assuming that all other business functions are operational. The PRP is also part of the BCP program.

The program objectives are to facilitate the response to the incident and resumption of our critical business operations, functions, and technology in a timely and organized manner so that the organization can continue as a viable and stable business. Furthermore, the highest priority of the organization during an emergency is to ensure the safety and security of human life.

With a solid BCP, we will be more prepared to handle the unexpected, we will have plans to continue providing acceptable service during and after the incident and we will better preserve customer relations and our corporate reputation.

## The Business Continuity Plan Framework

The BCP is structured with a goal of simplicity and ease of understanding. The elements of the plan are intended to be intuitive and non-prescriptive. We cannot anticipate all emergencies that may confront us, so it's important that the



## How the Plan Works in Practice

actions that come out of the BCP rely on leadership, a common purpose, communications and the experience, ingenuity and responsiveness of the response and recovery teams.

There are distinct steps required to develop and maintain a robust business continuity plan:

- conduct a [Business Impact Assessment](#) (BIA) by analyzing which of our business functions are most critical and what their Recovery Time Objectives (RTO) should be;
- prioritize the highest impact business functions and develop the associated recovery strategies;
- develop the necessary Emergency Response procedures to protect our staff first and our assets second;
- develop the best way to manage the emergency, crisis or disaster by creating Crisis Management procedures;
- train staff to respond as planned and enhance the organization's response capabilities by practicing through drills and simulations.
- ensure that staff, infrastructure and BCP program documentation are always current.

The oversight of the BCP is the responsibility of the Executive Leadership Team (ELT). The ELT will:

- approve the BCP framework;
- approve the individual recovery plans;
- assign accountabilities for managing the BCP and individual recovery plans;
- assume the role of the [Crisis Management Team](#) (CMT) during a severe event.

The ELT will be supported by a [Business Continuity Steering Committee](#) (BCSC) who will be responsible for:

- developing the plan framework;
- conducting a business impact assessment;
- identifying priority impacts and assigning teams to develop individual recovery plans;
- organizing documentation and maintaining the document repository.

The Business Continuity Steering Committee will be staffed by individuals from all Elexicon Energy lines of business and is chaired by the Vice-President, Distribution Operations who is the corporate champion for business continuity.

## How the Plan Works in Practice

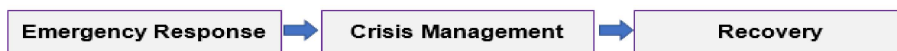
The [Crisis Management Team](#) (CMT) is responsible for all of the tasks needed to respond to, manage and recover from any serious, detrimental event effecting the organization.

With the exception of power outages, the [Emergency Response Team](#) Lead, will take the necessary immediate steps to stabilize the situation. For example, an event such as a fire may require immediate evacuation of one of our buildings. The [Emergency Response Team](#) Lead will evaluate the seriousness of the situation and arrange for the actions to protect staff and our assets. In this example, provide leadership to affected staff, initiate the evacuation, contact emergency services, and if necessary activate any required medical emergency response.

The [Emergency Response Team](#) Lead will also notify the leader of the [Crisis Management Team](#) of the situation and manage the situation until the Crisis Management Team leader assumes responsibility. The [Crisis Management Team](#) will then oversee all aspect of the emergency response.

Once the immediate steps have been taken to safeguard staff and assets, the [Crisis Management Team](#) may activate the designated Department Recovery Teams who will take action designed to achieve resumption of critical business activities within required time frames.

If the situation involves Power Interruptions, the [Power Restoration Plan](#) (PRP) will be activated. The Power Restoration Coordinator will oversee the restoration process as described in the PRP. If the highest level of response is required (level 3), the [Crisis Management Team](#) will be activated.



## Business Impact Assessment

A key component of business continuity planning is understanding the risks to our company should a disruption occur. These are catalogued in a [Business Impact Assessment](#) (BIA), which can be found [here](#).

Having a good understanding of the risks helps us identify specific threats to operations, financial performance, reputation, employees, and supply chains. It will also provide the guidance to prioritize the most critical risks and



## Elements of a Recovery Plan

identifies cross-dependencies. (For example, does a widespread power outage impact our ability to staff the call centre?)

This helps us identify critical business processes, time needed to recover operations, and resources required to support business activities. With this context, individual recovery plans are created and implemented

## Elements of a Recovery Plan

The elements of the recovery plans should not be overly prescriptive. It isn't possible to anticipate all emergencies, so it's important that the response relies on leadership, a common purpose, communications and the ingenuity and responsiveness of the recovery teams. For each recovery plan, there will be a team lead and a response team who will be accountable for creating, implementing and maintaining the plan. This group will be the team that responds should an event occur.

The plans should also include a clear description of the activation process, the manner in which the recovery team will operate, how they will communicate, a description of the records to be maintained during and after the event, how it will de-activate and how it will conduct de-brief sessions. The plans will include the team composition and back-up personnel, individual roles and responsibilities, all contact information and relevant reference material.

Lastly, the plan must include training schedules, plans for rehearsals and drills, version management and a schedule for periodic review.

Each plan will be housed electronically in an off-site server and will be accessible through internet-based applications.

## Maintaining Critical Information

Correct and updated information is critical to the success of any power restoration plan. The list below outlines the information that should be known before an incident occurs. To ensure the most current information is available, contact lists will be maintained and accessed under the Business Continuity Plan and included in the document repository.

- priority customers - total numbers, type of customers (e.g. commercial, industrial, critical, unique situations)
- contact lists within Elexicon Energy of all staff who have been assigned a BCP role - names, phone numbers, fax, email, etc.
- board members and stakeholders - names, phone numbers, fax, email, etc. (e.g. IESO, other emergency organizations)
- public officials - federal, provincial, municipal
- emergency contacts (suppliers, vendors, etc.)
- media and dedicated media spokesperson

Each recovery plan will access this master list to avoid duplication.



# Business Continuity Steering Committee

## Business Continuity Steering Committee

Title	Specific Responsibilities
Vice President, Distribution Operations and Asset Management	Steering Committee chair
Manager, Customer Care	Lead - Customer Experience recovery
Manager, Asset Management, Planning and Connections	Lead - Asset Management recovery
General Counsel and Corporate Secretary	Lead - General Counsel and Corporate Secretary recovery
Manager Health Safety & Environment	Lead - Health Safety & Environment Recovery
Manager, Financial Reporting & Controller	Lead - Finance and Regulatory Affairs recovery
Manager, Information Technology and Cyber Security	Lead - Information Technology recovery
Manager, Communications and Public Affairs	Lead- Corporate Communications recovery
Training and Administration Specialist	Lead - Human Resources recovery
Manager, Corporate Services	Lead - Emergency Response Team, Fleet recovery and Logistics recovery
Manager, Control Room	Lead – Distribution Operations recovery and Incident Owner, Power Restoration Plan
Manager, Operations Technology and Innovation	Lead – Operational Technology recovery

## Purpose

The Business Continuity Steering Committee (BCSC) is responsible for developing the plan framework, conducting a business impact assessment, identifying priority impacts and assigning teams to develop individual recovery plans, and organizing documentation and maintaining the document repository.

The Business Continuity Steering Committee is staffed by individuals from all Elexicon Energy lines of business and is chaired by the VP, Distribution Operations, who on behalf of the Executive Leadership Team, is the corporate champion for business continuity.

The Steering Committee will ensure that the Business Continuity Plan is active and that recovery procedures are current. The Steering Committee will report to the ELT on the status of the Business Continuity Plan on at least an annual basis. The Steering Committee will ensure that the Business Continuity Plan satisfies the financial, operational, and regulatory requirements and goals for business continuity at Elexicon Energy.

The project timeline for developing the BCP Program can be found [here](#).

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## Scope

The scope of the Business Continuity Steering Committee extends to the program for the entire organization.

## Objectives

- Oversee the development and maintenance of the enterprise-wide Business Continuity Plan;
- Ensure that corporate recovery objectives are met.

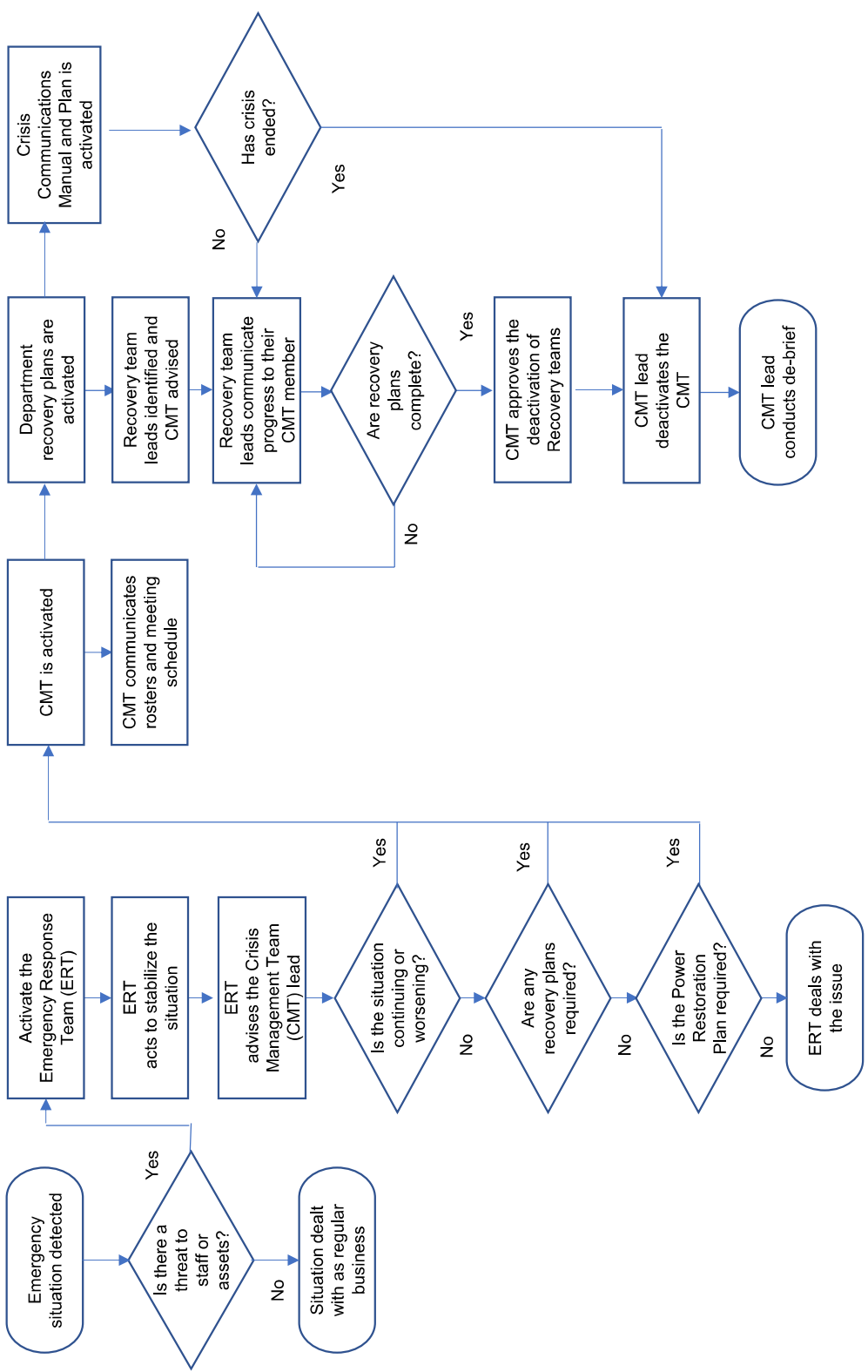


# Roles and Responsibilities

General responsibilities of Business Continuity Steering Committee members include the following:

- Develop and approve corporate recovery objectives and assumptions that guide development of business unit recovery procedures;
- Make recommendations to the Executive Leadership Team regarding corporate business continuity recovery strategies;
- Coordinate priorities of recovery between departments and business units;
- Maintain the content in the ReadySmith (RaaS) site;
- Act as the lead contact for content in their organization and assume accountability for that organization's recovery response;
- Ensure that internal and external contacts listed on RaaS are current and accurate.
- As appropriate and considering privacy requirements, maintain a list of home and personal contacts for their teams;
- Approve vendors used by the organization for business continuity purposes and monitor their performance;
- Develop and make recommendations to the Executive Leadership Team regarding the enterprise-wide annual Business Continuity Plan budget;
- Review the adequacy and allocation of recovery resources in terms of funding, personnel, equipment, and service levels;
- Monitor Business Continuity related projects managed by business units or departments;
- Review the enterprise-wide Business Continuity program, including individual department recovery plans, strategies, etc., on at least an annual basis and report to the Executive Leadership Team and the Board of Directors the results of the review;
- Review recovery procedures exercise and test results and report to the Executive Leadership Team on the activities;
- Ensure that a program for employee emergency awareness is in effect and is adequate;
- Maintain formal minutes of Steering Committee meetings to document decisions and inform the Executive Leadership Team of its activities;
- Coordinate and integrate the Crisis Management Team and activities with those of business recovery and emergency response teams.





# Business Impact Assessment

## Business Impact Assessment

A key component of business continuity planning is understanding the risks to our company should a disruption occur. These are catalogued in a business impact assessment (BIA) which can be found [here](#).

Having a good understanding of the risks helps us identify specific threats to operations, financial performance, reputation, employees, and supply chains. It will also provide the guidance to prioritize the most critical risks and identifies cross-dependencies. (For example, does a widespread power outage impact our ability to staff the call centre?)

This will help us identify critical business processes, time needed to recover operations, and resources required to support business activities. Once done, individual recovery plans can be created and implemented

The critical business functions and their recovery times are as follows:

### **2 hour recovery time:**

- Managing Public and Elexicon/contractor field staff safety
- Managing unplanned outage restoration
- Monitoring distribution system configuration and conditions
- Dispatching and management of Elexicon or contractor field forces for unplanned outages
- Communicating progress on unplanned outages

### **4 hour recovery time:**

- Locates
- Call Centre/Reception phones and email
- Access to Governance records and meetings with Boards of Directors

### **24 hour recovery time:**

- Inspections
- Managing unplanned and emergency construction and maintenance projects
- Bank Deposits and Cash Application
- Employee Pay and Remittances
- Interval data management transmission, storage and retrieval
- Maintaining Pre-authorized payment plans
- Customer reconnections, both nonpayment, and failure to contract
- Special Projects - Retailer relations
- Communication among ELT leaders





13	Customer Experience	Interval data management transmission, storage and retrieval	e - 24 Hours	Low	High	Low	Low	Low	Medium	8	Servers, Outlook, access to Shares, Comexco AMI, Sensus AMI, MV90 Interval Data Acquisition, Savage ODS, Kinetiq Settlement, Power/View Web, Access to shares drive, Teams or Outlook email, Access to shares drive, Teams or Outlook email, Access to shares drive, Teams or Outlook email, Remote software	Laptop, modems, Fishtick VPN	None	Internet, VPN, AS2, cell phone	Billing, Credit, Finance, Engineering, Operations, Regulatory, OT	IESO MDMR, External Customers
14	Customer Experience	Maintaining Pre-authorized payment plans	e - 24 Hours	Low	Medium	Low	Low	Low	Low	7	MS Surface, Monitor, Wireless headset,	MS Surface, Monitor, Wireless headset,	None	Internet, VPN, soft phone	Technology and Innovation, Dx Operations, Finance, Billing, Credit, Call Centre	
15	Customer Experience	Customer reconciliations, both nonpayment, and failure to contract	e - 24 Hours	Low	Medium	Low	Low	Low	Low	6	MS Surface, Monitor, Wireless headset,	MS Surface, Monitor, Wireless headset,	ESA audit	Internet, VPN, soft phone	Technology and Innovation, Dx Operations, Metering, Wholesale Settlements Credit, Call Centre, Lines	Olameter, Northstar
16	Customer Experience	Special Projects Retailer relations	e - 24 Hours	Low	Low	Low	Low	Low	Low	5	EHC transactions server, Microsoft office, Outlook	Laptop	None	Internet, VPN	Technology and Innovations, Billing, Finance	ERTH retailers, Active
17	Executive	Communication among ELT leaders	e - 24 Hours	Low	Low	Low	Low	Low	Low	5	Outlook, Elexicon Drives, Internet, MS office	Laptop, VPN, mobiles	Records on Shares	Internet, M Teams	Board of Directors/ Communication/ Spoke person	Social Media
18	Asset Management	Fault Level Inquiries	d - 3 Days	Medium	High	Low	High	High	High	12	PC (Outlook, MS Office, Adobe, Internet, Elexicon Drives), GIS, CRM, AutoCAD, Savage, KINETIQ, SCADA Database	None	System Reliability Data	None	IT/OT, Settlements, SCADA Technician, Operations	Metering Database - IESO (KINETIQ & Savage)
19	Asset Management	Low Voltage Connection Coordination	d - 3 Days	High	High	Low	Low	Medium	Medium	10	PC (Outlook, MS Office, Adobe, Internet, Elexicon Drives), dservices.inbox, Whitby Engineering inboxes, Elexicon Drives, Receipt Filler, Program, Inspection Program	Headset, Printer, Scanner	QISFS, Month End SharePoint Reports, Service Orders, Instruction Orders, OEB Spreadsheets	Phone	Operations, Metering, Customer Care	ESA
20	Finance and Regulatory Affairs	Accounts Payable - Priority and Regular payments	d - 3 Days	Low	Medium	High	Low	High	High	10	Internet Banking, E-Mail	Cheque Printer	Invoice copies	Fax, Phone	Invoice Approving Departments	TD Bank, Vendors
21	Finance and Regulatory Affairs	Financial Reporting and Month End Close Reporting (Payables, Bank Balances, AR Aging, etc)	d - 3 Days	Low	Low	High	Low	High	High	9	CDM, Internet, Network, share drive	None	Excel spreadsheets	Phone	Management and Finance Departments	Shareholders, TD Bank, OEB, Credit Rating Agency, Auditors
22	Finance and Regulatory Affairs	Quarter End and Year End Close	d - 3 Days	Low	Low	High	Low	High	High	9	Internet, Network, share drive	None	Excel spreadsheets	Phone	Finance Departments	BDO (GP-VAR)
23	Finance and Regulatory Affairs	Cash Management	d - 3 Days	Low	Low	High	Low	High	High	9	Internet, Network, share drive	None	Electronic ban information	fax and internet	Finance Departments	TD Bank and TD Securities
24	Customer Experience	Issuance of bills	d - 3 Days	Low	High	Medium	Low	Low	Low	8	Shares, Microsoft office file transfer services,	MS Surface, Monitor	None	Internet, VPN, File Transfer Services	Technology and Innovation, Wholesale Settlements	Kubra, UIR-assis, MET, IESOMDMR