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From: Ontario Energy Board <webmaster@oeb.ca>  
Sent: Tuesday, May 19, 2026 12:23 PM  
To: Office of the Registrar <Registrar@oeb.ca>  
Subject: Redacted - Letter of Comment - EB-2026-0129

-- Name --  
S Wilson

-- Do you reside in the impacted service area? -- Yes

-- Comments --

Letter of Comment

Re: Toronto Hydro – Non Wires Solutions Incentive Mechanism OEB File No.: EB 2026 0129

To:

Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, Ontario M4P 1E4

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I am writing as a resident of Toronto to provide comments on Toronto Hydro Electric System Limited’s application for approval of a proposed Non Wires Solutions (NWS) Incentive Mechanism.

I am particularly concerned about the implications of this application where the underlying driver appears to be the anticipated development of one or more large AI data centres in or near residential neighbourhoods.

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**AI Data Centres Create Unique and Concentrated Impacts.**

Large AI data centres are not ordinary commercial electricity users. They impose exceptionally high and continuous electricity demand and often require significant supporting infrastructure, including new substations, transformers, and feeder upgrades. These impacts are highly localized and are frequently borne by nearby residential communities.

In addition to electricity demand, AI data centres are also associated with substantial water use and continuous operational noise from cooling systems and electrical equipment. These factors can materially affect quality of life, particularly for seniors, people working from home, and those on fixed incomes.

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**Cost Causation and Fairness Concerns**

A foundational principle of Ontario energy regulation is that costs should, to the extent possible, be borne by those who cause them.

Where new Non Wires Solutions programs and associated incentive mechanisms are required primarily due to the electricity demand of private, for profit AI data centres, it raises serious concerns about cost causation if those costs are later recovered from general residential ratepayers.

Residential customers did not create this new demand and receive limited, if any, direct benefit from the accommodation of energy intensive data centres. This concern is particularly acute for fixed income and low income households, for whom even small ongoing rate increases can have meaningful impacts.

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**Neighbourhood Impacts Must Be Explicitly Recognized Beyond rates, residential communities may experience:**

- Construction disruption related to new or expanded electrical infrastructure
- Increased noise from substations, transformers, and data centre operations
- Visual and land use changes inconsistent with residential character
- Reliability risks associated with large, concentrated loads

These impacts are real and localized, while the economic benefits of AI data centres accrue largely to private operators.

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Implications for the Proposed Incentive Mechanism While I recognize that Non Wires Solutions may, in some cases, be preferable to building new infrastructure, this does not automatically justify socializing program incentives across the residential customer base.

If the OEB considers approving the proposed incentive mechanism, I respectfully submit that it should do so only with strong safeguards, including:

- Clear evidence that Non Wires Solutions are materially less costly than direct infrastructure funded through rates
- Explicit analysis of whether the system need is driven by large commercial or AI related loads
- Restrictions or caps on any future cost recovery from residential ratepayers
- Assurance that vulnerable customers are protected from cross subsidizing private development

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#### Conclusion

Residential communities should not face higher electricity costs or neighbourhood disruption to support energy intensive AI data centres unless it is clearly demonstrated that they are better off as a result.

I respectfully urge the Ontario Energy Board to apply strict cost causation principles, carefully assess neighbourhood impacts, and ensure that residential and fixed income ratepayers are not unfairly burdened by costs arising from large private facilities.

Thank you for the opportunity to provide comments on this application.

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Sincerely,  
Sharon King-Wilson  
Toronto, Ontario

-- Was AI used for the letter of comment? --

Yes