

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
Schedule B to the *Energy Competition Act, 1998*, S.O. 1998,
c.15;

AND IN THE MATTER OF an Application by Elexicon
Energy Inc. (“Elexicon”) for an Order or Orders approving or
setting just and reasonable distribution rates and other charges,
effective January 1, 2027 to December 31, 2031.

INTERROGATORIES TO OEB STAFF

ON BEHALF OF THE

SCHOOL ENERGY COALITION

M-SEC-1

[PEG Framework Report, p.46] Please provide a revised version of Table 3 that shows PEG’s G-Factor calculation on a total cost basis derived from PEG’s economic cost model.

M-SEC-2

[PEG Empirical Report, p.7] PEG notes that Clearspring’s sample selection are suboptimal for benchmarking Elexicon since “[o]nly 8 of the 82 sampled U.S. distributors have fewer customers than Elexicon, and only an additional 7 companies are larger but still in the same size ballpark.” Has PEG undertaken any analysis to determine the impact on the benchmarking results if a smaller sample of U.S. companies, that are closer in size to Elexicon, was used? If so, please provide details.

M-SEC-3

[PEG Empirical Report, p.32] PEG notes that one of the disadvantages of using a U.S. sample is that few Ontario distributors use U.S. GAAP, which generally involves more capitalization of OM&A expenses. Please discuss what impact would this have on the benchmarking results for an Ontario distributor’s MIFRS.

M-SEC-4

[PEG Empirical Report, p.36] Ideally, would benchmarking of Elexicon costs use Ontario or U.S. peer utilities?

M-SEC-5

[PEG Empirical Report, p.81] SEC would like to understand the sensitivity of the benchmarking results to changes in forecast costs during the rate term (2027-2031). Please provide the change in the ‘CIR Period 2027-2031’ period total, capital, and OM&A cost benchmark scores for the following changes:

- a. Increase or decrease in Elexicon’s forecast capital costs each year between 2027 and 2031 of \$1M.

- b. Increase or decrease in Elexicon's forecast OM&A costs each year between 2027 and 2031 of \$1M.
- c. Increase or decrease in both Elexicon's forecast OM&A and capital costs each year between 2027 and 2031 of \$1M.
- d. Are the impacts of these changes in parts (a)-(c) linear (i.e. a \$2M increase in costs will result in double the impact in the benchmark score)?

M-SEC-6

[PEG Empirical Report, p.81] Please provide for each year between 2027 and 2031:

- a. The percentage change in the benchmark total, capital and OM&A costs, for each 1% change in customers.
- b. The percentage change in the benchmark total, capital and OM&A costs, for each 1% change in peak demand.

M-SEC-7

[PEG Empirical Report, p.91] PEG provides a table showing Ontario productivity growth by distributor size. Did PEG undertake any research regarding the productivity growth of distributors by rate framework (i.e. Price Cap vs. Custom IR)? If so, please provide details.

Respectfully, submitted on behalf of the School Energy Coalition, this June 5th, 2026.

Mark Rubenstein
Counsel for the School Energy Coalition