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Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
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Toronto, ON M4P 1E4

June 5, 2026

**EB-2025-0312 Elexicon Energy Inc. (Elexicon Energy) 2027-2031 Custom Rate Application
Pollution Probe Interrogatories on OEB Staff (PEG) Evidence**

Dear Mr. Murray

Please find attached Pollution Probe's Interrogatories on the evidence filed by OEB Staff. This pertains to relevant issues and information included in the Pacific Economics Group's Empirical and Framework Reports.

Respectfully submitted on behalf of Pollution Probe.



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Cc: All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

Elexicon Energy Inc. (Elexicon Energy)

2027-2031 Custom Rate Application

**POLLUTION PROBE INTERROGATORIES
OEB STAFF EVIDENCE
(PACIFIC ECONOMICS GROUP)**

June 5, 2026

**Submitted by: Michael Brophy
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PEG-PP-1

Please provide any comments or recommendations related to opening Rate Base, particularly given that Capital has been overspent for the 8 years.

PEG-PP-2

- a) What difference in assessment and consideration should be used for this application which is an early rebasing, compare to what would normally occur if Elexicon had waited until the end of its 10-year deferred rebasing period.
- b) What residual merger obligations or benefits should be considered given that two years of the ten year period are being lost, subject to early rebasing.

PEG-PP-3

- a) Given that this application is a net increase to the rates previously set for the merged utility, what approach does PEG recommend to assess and validate whether Elexicon has successfully delivered \$34.2M in sustainable synergy savings since merger, and \$5.2M in sustainable annual synergy savings through the integration of the predecessor utilities. [per Elexicon evidence reference 1/1/1, page 4].
- b) If it is not objectively evident that sustainable savings have resulted from the merger, what treatment is recommended for the OEB to consider during this rate term.

PEG-PP-4

Elexicon predicates its early rebasing and application on a higher than typical growth in its service territory and the lack of current ability to meet customer and system needs.

- a) Please explain how Elexicon and its application concurs with or diverges from recent rebasing applications for similar Ontario utilities, on the basis of the issues highlighted by Elexicon (e.g. growth and system readiness).
- b) Please comment on how the current underlying system and performance of Elexicon (vs. peer Ontario utilities) impacts their ability to meet growth and energy transition needs for the future. For example, PEG uses Toronto Hydro's recent rebasing as an example and Toronto Hydro positioned their application as largely status quo since the underlying system is already currently performing adequately as a base for enhancements to support the energy transition (including DERs).

PEG-PP-5

- a) Please confirm that the early rebasing request by Elexicon following the utility merger is not a normal occurrence in Ontario following a utility merger. If not correct, please provide details.
- b) Does PEG believe that there is sufficient evidence and basis to support the early rebasing request?

PEG-PP-6

Does PEG believe that there is sufficient unique circumstances to support Elexicon's CIR treatment request for this rate term? If not, please indicate if price cap or revenue cap is more appropriate, and why.

PEG-PP-7

Reference: Ontario is engaged in a transition to a lower carbon economy. This transition would likely entail electrification of important economic activities such as transportation and space heating that today rely heavily on fossil fuels for energy. Electrification would substantially increase electricity demand. [PEG Framework Report – Elexicon, page 35]

- a) Please provide the references and basis supporting this statement.
- b) What is the basis for this to impact the Elexicon plan, costs and obligations over the rate term?
- c) Does PEG believe that Elexicon is currently positioned to meet the energy transition needs in its service territory?