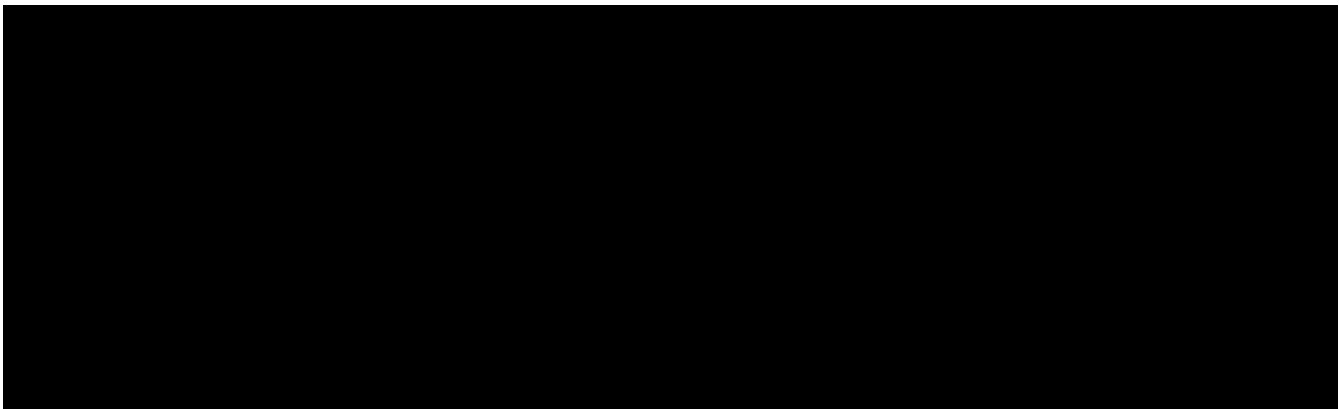




Intervention Form

Case Number:

EB-2026-0142

Requesting information on behalf:

Of an organization

Intervenor Name:

Electricity Distributors Association (EDA)

Mandate and Objectives:

EDA leverages the unique perspective of distribution-sector expertise to provide members with analysis of legislation, market rules and regulatory matters. EDA advocates on behalf of Ontario electricity distributors and represents their interests in legislative, regulatory and market proceedings. Local distribution companies (LDCs) are materially affected by the IESO application because they collect IESO-approved fees from customers and are directly affected by decisions on revenue requirements, expenditures, fee design, cost recovery, data requirements, and implementation obligations. EDA seeks to represent the interests of electricity distributors and the customers they serve, promote efficient planning across the electricity sector, and identify opportunities for cost-effectiveness and regulatory efficiency.

Membership of the Intervenor and Constituency Represented:

EDA is the voice of Ontario's local distribution companies and represents the interests of 50 publicly and privately owned LDCs. Ontario distributors deliver electricity to approximately five million residential, commercial, industrial and institutional customers across the province.

Programs or Activities Carried Out by the Intervenor:

Policy analysis, regulatory advocacy, industry representation, stakeholder engagement, education, information sharing, committee and council coordination, and member support relating to Ontario's electricity sector. EDA has regularly participated in OEB policy consultations, rate proceedings and sector-wide applications, including previous IESO fee and revenue requirement proceedings. While we have not intervened in any rate applications over the past 12 months, we have actively participated in a number of OEB regulatory proceedings, including EB-2020-0230, EB-2022-0002, EB-2022-0137, EB-2022-0318, and EB-2024-0004.

Governance Structure:

EDA is a member-based association governed by an elected Board of Directors and supported by a leadership team. EDA representatives receive direction through engagement with members, subject matter experts and councils, and report back through established governance and consultation processes.

Representatives:

Brittany Ashby
Bashby@eda-on.ca
4168864420

Ted Wigdor
twigdor@eda-on.ca
4168096781

Cost Claim Filing contact:

Other Contacts:

Rudra Mukherji
rmukherji@eda-on.ca

Frequent Intervenor Form:

Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:

N/A

Names and email addresses of individuals to be added as contacts for this proceeding:

N/A

OEB Proceedings:

Item Description	Category	Status
EB-2020-0230	Electricity – Rates	Granted
EB-2022-0002	Electricity – Rates	Granted
EB-2022-0137	Electricity – Rates	Granted
EB-2022-0318	Electricity – Rates	Granted
EB-2024-0004	Electricity – Rates	Granted

Issues:

The IESO application seeks approval of 2026–2028 revenue requirements, operating and capital expenditures, usage fees, operating reserve amounts, and other market-related fees. These matters are directly relevant to electricity distributors, as LDCs collect IESO usage fees from customers and are responsible for implementing associated billing, settlement, reporting, and operational requirements. EDA expects to participate on issues including, but not limited to:

- Issues 1.1–1.9: The reasonableness of the proposed revenue requirements, operating expenditures, staffing and compensation costs, and capital investments, including whether they are prudent, cost-effective, and aligned with the Minister-approved Business Plan.
- Issues 2.1–2.6: The methodology used to establish IESO usage fees, cost allocation among customer classes, proposed effective dates, and the treatment of differences between approved and interim fees. EDA has a particular interest in the impacts of these proposals on distributors’ billing, settlement, reporting, and customer communication obligations.
- Issues 3.1–3.10: The appropriateness of proposed application, registration, procurement, assessment, and training fees, including whether they are transparent, cost-based, and support efficient market participation. EDA will also assess any downstream impacts these fees may have on distributors and their customers.
- Issue 4.1: The appropriateness of the proposed \$30 million Operating Reserve in the Forecast Variance Deferral Account, including the rationale for the reserve level and any associated customer impacts.
- Issue 5.1: Whether the IESO has appropriately addressed commitments and directions arising from previous OEB decisions.

EDA also intends to assess whether the proposed expenditures, investments, and fee proposals create downstream impacts on distributors, including implementation, reporting, settlement,

cybersecurity, system integration, and administrative requirements. Where such impacts exist, EDA may seek additional information regarding implementation timelines, cost implications, operational readiness, and stakeholder engagement. Finally, EDA intends to comment on the proposed streamlined review process and draft issues list to ensure that all matters with material impacts on distributors and electricity customers are appropriately considered within the scope of the proceeding.

Policy Interests:

EDA represents the policy interests of Ontario electricity distributors and the customers they serve. The application has implications for electricity affordability, efficient market administration, cost allocation, regulatory burden, investment planning and implementation obligations. These interests are directly relevant and material to the issues before the OEB.

Hearings:

EDA is prepared to participate in a written hearing at this time. However, given the magnitude of the applied-for rate increase, request for streamlining process, and complexity of the issues under consideration, EDA reserves the right to request additional procedural steps, including an oral hearing, if it becomes apparent that certain matters cannot be adequately addressed through a written process alone. EDA will also provide comments on the IESO's proposed streamlined process as part of this proceeding.

Evidence:

EDA does not intend to file evidence at this time but reserves the right to do so should the record demonstrate a need for distributor-specific evidence.

Coordination with Other Intervenor:

EDA will coordinate with other intervenors where practical and efficient. EDA's participation will focus on matters that uniquely affect electricity distributors and their customers to minimize duplication and promote an efficient proceeding.

Cost Awards:

EDA is not seeking an award of costs in this proceeding.

Language Preference:

EDA does not intend to participate in the hearing using the French language.