EB-2026-0129

TORNTO HYDRO-ELECTRIC SYSTEM

Application for a proposed Non-Wires Solutions (NWS) Incentive Mechanism effective May 1, 2026 to December 31, 2029

POWER WORKERS' UNION (PWU) INTERROGATORIES

July 17, 2026

PWU-01

Ref: Schedule 3/ORIGINAL/Page 3/Footnote 6

The reference states:

> Since the 2025 CIR Application, Toronto Hydro updated the list of stations targeted for LDR in response to evolving system conditions and needs, driven by customer connections.

Question(s):

a) Please provide the list of stations that were (i) originally targeted for LDR in the 2025 CIR Application and (ii) list of stations targeted for LDR as updated afterwards
b) Which of the six transformer stations that are the subject of the current application were targeted for station expansion in the 2025 CIR Application?
c) Please explain why Toronto Hydro's DSP as presented in the 2025 CIR Application could not forecast the pressing system needs as related to the six transformer stations and presented in the current application?

PWU-02

Ref: Schedule 3/ORIGINAL/Page 5

The reference states:

> Pursuing LDR at these target stations enables Toronto Hydro to defer approximately $28.7 million of capital into a future rate period and avoid approximately $15 million of capital investment.

Question(s):

a) Please list by station the capital projects that are deferred or avoided or both assuming this application is approved and the planned work is executed. Where applicable, please include project name, the revised expansion/construction year, original in-service date, revised in-service date, and estimated capital cost

PWU-03

Ref: Schedule 3/ORIGINAL/Page 7

The reference indicates that Toronto Hydro is forecasting to procure 30MW of demand response capacity over the 2026-2029 period**.** The same reference presents the following information in Table 4:

Table 4: Forecasted Annual Payments to LDR Program Participants ($ Thousands)

	2026	2027	2028	2029
Annual MWs Procured	**12**	**15**	**25**	**30**
Capacity Payments	**$714**	**$892.5**	**$1,470**	**$1,743**

Question(s):

a) Please provide any reports, studies and analyses used to forecast the annual procurements in the table
b) Has Toronto Hydro modeled the impact of customer withdrawal/attrition, communication failures, cyber incidents, simultaneous DER failure, etc.
c) What contingency plans does Toronto Hydro have if contracted demand response resources fail to deliver during peak demand?
d) Please discuss Toronto Hydro’s experience with LDR so far in terms of MW requested and MW delivered
e) What is Toronto Hydro’s view on whether reliance on annually contracted third-party resources would provide a level of reliability and operational control comparable to utility-owned infrastructure?

If the answer to any of (b) to (c) is yes to any extent, please produce the applicable models or plans.

PWU-04

Ref: General questions

a) Has Toronto Hydro undertaken any assessment of the employment impacts associated with the implementation of the LDR program?
b) In the current application, please describe any impacts and estimated change in unionized positions, management positions, and contractor positions
c) Will any work previously performed by Toronto Hydro employees now be performed by aggregators, DER providers, external consultants, private contractors? If yes, please describe each activity
d) Will there be any additional work or job positions created for internal employees arising from the LDR program? If yes, please describe the positions and activities

If the answer is yes to any extent, please produce the applicable assessments.