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July 17, 2026

Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Mr. Murray,

**RE: EB-2026-0129 Toronto Hydro Application for a proposed Non-Wires Solutions
Incentive Mechanism - Interrogatories of Energy Probe**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to Toronto Hydro on its EB-2026-0129 Application for a proposed Non-Wires Solutions Incentive Mechanism effective May 1, 2026, to December 31, 2029.

Submitted on behalf of Energy Probe.

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EB-2026-0129
Toronto Hydro-Electric System Limited
Application for a proposed Non-Wires Solutions (NWS) Incentive
Mechanism effective May 1, 2026, to December 31, 2029

Interrogatories of Energy Probe

July 17, 2026

EP-1

Reference: Schedule 3, Page 1

Question:

Please explain the meaning of the word *Local* in the *Local Demand Responses Program*. What are the maximum and minimum sizes of the areas to be considered *Local*?

EP-2

Reference: Schedule 3, Page 2

Preamble: “It is designed to help address short- to medium-term capacity constraints at specific transformer stations by leveraging demand response (“DR”), including behind-the-meter and customer-owned distributed energy resources (“DERs”), to manage loading and capacity on the grid.”

Questions:

- a) Please indicate if DERs include the following: rooftop solar, ground based solar, wind turbines, gas turbine generators, gas powered reciprocating generators, and battery energy storage systems.
- b) Do customer-owned DERs have to be dispatchable 24 hours a day, 7 days a week, 365 days of the year (24/7/365) to help address capacity constraints? If the answer is no, please explain how DERs that are not dispatchable on a 24/7/365 basis can be relied on to address
- c) Does Toronto Hydro have DER Management Systems (DERMS) in Place throughout its service territory? If the answer is no, please list the areas that do not have DERMS in place.
- d) Are DERMS required for DERs to export power into a distribution grid?
- e) Does Toronto Hydro have a Distribution System Operator (DSO)?
- f) Is a DSO required for distribution systems with numerous DERs such as Toronto Hydro

EP-3

Reference: Schedule 3, Page 4, Figure 1, *Target Stations for 1 LDR During 2025-2029* and Table 1: Load Transfers Anticipated at Target Stations in 2025-2029 Period

Questions:

- a) Please provide a link to Toronto Hydro's Load Capacity Map and explain how the service areas of the 6 transformer stations relate to the load capacity information shown on the Load Capacity Map.
- b) Please confirm that the OEB requires Toronto Hydro to update the Load Capacity Map each quarter as load capacities change with customer attachments and electrification.
- c) Are the entire service areas of the 6 transformer stations identified in Figure 1 currently capable of two-way flow of electricity? If the answer is yes, what capital investments were required to make them capable? If the answer is no, what capital investments will be required to make them capable?
- d) How many customers are served by Toronto Hydro in the 6 transformer service areas?
- e) What equipment does a customer need, such as bi-directional meter and inverter to export electricity into the Toronto Hydro distribution system?
- f) What percentage of customers in the 6 transformer service areas have the equipment required to export electricity into the Toronto Hydro distribution system?
- g) Are there currently any data centres in the service areas of the 6 transformer stations?
- h) Does Toronto Hydro have a moratorium on connections of data centres in the 6 transformer service areas?

EP-4

Reference: Schedule 3, Page 6, Table 2, Summary of Toronto Hydro's LDR Program Benefit-Cost Analysis (2026-2029) and EB-2023-0195, Undertaking Response JT5.15, Appendix A (April 22, 2024).

Preamble: Toronto Hydro estimates that \$15 million in load transfer capital investment will be avoided over the life of the assets (65 years overall) at an operational cost of \$1.84 million.

Questions:

- a) Please file EB-2023-0195, Undertaking Response JT5.15, Appendix A (April 22, 2024) so that it is on the record of this proceeding.
- b) Does the Benefit Cost analysis account for the life of NWS assets such as rooftop solar panels and batteries? If the answer is yes, please explain how. If the answer is no, please explain why not.

- c) Does the Benefit Cost analysis account for the capital cost of DERMS required for the NWS solution? If the answer is yes, please explain how. If the answer is no, please explain why not.
- d) Does the Benefit Cost Analysis account for the cost of the DSO? If the answer is yes, please explain how. If the answer is no, please explain why not.
- e) Please provide a detailed estimate of the \$28.7 million in load transfer capital investment deferred for 4 years at an and of the operational cost of \$3.8 million for each of the four years and for each of the 6 transformer stations including all assumptions and sources of data.
- f) Please provide a detailed estimate of the \$15 million in load transfer capital investment avoided over the life of the assets (65 years overall) at an operational cost of \$1.84 million for each of the 6 transformer stations for each year of the 65 years including all assumptions and sources of data.

EP-5

Reference: Schedule 3, Page 7, Table 3, Summary of Toronto Hydro’s LDR Program Benefit-Cost Analysis (2026-2029) and EB-2023-0195, Undertaking Response JT5.15, Appendix A (April 22, 2024).

Questions:

- a) Please provide a detailed estimate of the \$2.50 million in load transfer capital investment deferred for 5 years at an operational cost of \$0.71 million for each of the 6 transformer stations for each of the 5 years including all assumptions and sources of data.
- b) Please provide a detailed estimate of the \$7.50 million in load transfer capital investment avoided over the life of the assets (48 years) at an operational cost of \$4.99 million for each of the 6 transformer stations for each of the 48 years including all assumptions and sources of data.

EP-6

Reference: Schedule 3, Page 7, Table 4: Forecasted Annual Payments to LDR Program Participants (\$ Thousands)

Questions:

- a) Please explain how the capacity payment amounts were estimated including assumptions and all sources of data.
- b) Please add two lines to Table 4: “MWh” and “\$/MWh” showing the amounts.

EP-7

Reference: Schedule 3, Page 8

Preamble: “For clarity, LDR capacity is procured annually, and the commitment term from the participants to Toronto Hydro is from June-September each year.”

Questions:

- a) Will the participants have to sign a contract with Toronto Hydro? If the answer is yes, please file the standard contract that participants will be required to sign. If the answer is no, please explain why not.
- b) Please explain what actions Toronto Hydro would take if prior year participants decided not to participate in a subsequent year.

EP-8

Reference: Schedule 3, Page 9

Preamble: “Throughout the capacity procurement process for the LDR program, Toronto Hydro engages with commercial and industrial customers and aggregators within the target station areas to educate them about the LDR program and measure their interest in participation.”

Questions:

- a) Please explain what an aggregator is, and what its role in the energy market is.
- b) Are aggregators customers of Toronto Hydro or is Toronto Hydro a customer of aggregators?
- c) How many aggregators are now operating in Toronto Hydro’s service area?
- d) Do aggregators only operate in the commercial and industrial markets, or do they also operate in the residential market?
- e) Are aggregators required to sign a contract with Toronto Hydro? If the answer is yes, please file the standard form of contract that an aggregator must sign with Toronto Hydro.
- f) Does Toronto Hydro review contracts that aggregators sign with their customers such as the customers that have rooftop solar units that the aggregator is aggregating?
- g) If customers have a dispute with an aggregator, should they approach Toronto Hydro or the OEB for resolution?

EP-9

Reference: Schedule 3, Page 10

Preamble: “To support the delivery of this program in alignment with DER integration policy objectives, Toronto Hydro requests approval to implement a MoP incentive, whereby a 25%

margin will be applied to the payments made to program participants providing services under the LDR program.”

Question:

Will Toronto Hydro pass all the money collected to the program participants, or will it retain any for itself? Please explain your answer,

EP-10

Reference: Schedule 3, Page 11, *Table 5: 2026-2029 LDR Program MoP Incentive 1 Forecast (\$ Thousands)*

Question:

Please add a row to Table 5 that shows the \$/KWh that Toronto Hydro expects to collect from ratepayers at next rebasing when the MoPIDA is cleared for disposition.