



August 12, 2026

VIA RESS

Mr. Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Mr. Murray,

**RE: GrandBridge Energy Inc.
2027 IRM Distribution Rate Application
OEB File No: EB-2026-0042**

GrandBridge Energy Inc. ("GBE" or "GrandBridge Energy") submits its 2027 Incentive Rate-setting Mechanism ("IRM") Application and 2027 Incremental Capital Module ("ICM") Application (collectively, the "Application") for approval of proposed distribution rates and other changes effective January 1, 2027. The ICM request relates to four new 27.6 kV feeder breakers at Hydro One Inc.'s ("HONI" or "Hydro One") Preston Transformer Station and the associated GBE distribution system work required to connect the new feeder positions (the "Project"). In this cover letter, GBE requests the following, as described below: (1) for the Application to be bifurcated into two phases, (2) the ICM portion of the Application be held in abeyance until GBE files its consolidated Distribution System Plan ("DSP"), and (3) confidential treatment of a diagram and material in Appendix B-3: GBE's OEB Industry Relations Enquiry 2024-0498 in the Application.

Request for Bifurcation and Abeyance

GBE respectfully requests that the OEB bifurcate the Application into two phases. Phase 1 would address GBE's annual, mechanistic IRM rate adjustment and related matters in the ordinary course. Phase 2 would address the ICM funding request for the Project and would be held in abeyance pending the filing of GBE's consolidated DSP in early 2027.



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The abeyance request reflects the timing of GBE's first consolidated DSP since amalgamation. Under the OEB's Decision and Order in EB-2021-0280 (GBE's mergers, acquisitions, amalgamations and divestitures decision), GBE is required to file a consolidated DSP concurrently with any ICM requests for post-2023 distribution-system capital investments.

GBE submits that it is appropriate to file the ICM now, rather than defer the filing until the DSP is complete. The Project is a 2026 in-service investment and is not a prospective capital project whose implementation can be deferred pending completion of the DSP. GBE has incurred, and continues to incur, material Project costs, including contractual payment obligations to Hydro One. The Project is not funded through existing distribution rates, and GBE is seeking ICM recovery effective January 1, 2027. Delaying the filing would therefore not defer or avoid the underlying investment; it would only postpone the commencement of the regulatory process for determining the appropriate recovery of costs associated with assets placed in service in 2026.

The timing of the filing also reflects the regulatory circumstances surrounding the Project. GBE was awaiting OEB Staff's final response to its Industry Relations-2024-0498 ("IRE") concerning cost responsibility for the Preston TS breakers. That response was received on June 8, 2026, after which GBE proceeded to finalize the ICM on the basis of OEB Staff's position. Given that timing, GBE did not have sufficient time to complete its first consolidated DSP, as contemplated by the OEB's Decision and Order in EB-2021-0280.

Filing the ICM now while holding its substantive consideration in abeyance appropriately balances timely regulatory review with the need for the OEB to have the benefit of GBE's consolidated DSP. The filing places the Project, the relief requested and the relevant cost information before the OEB on a timely basis, while the requested abeyance ensures that the ICM will not be substantively considered until the DSP is available to provide the broader, current system-planning and capital-program context. This approach also permits the mechanistic IRM component of the Application to proceed without delay and avoids unnecessarily postponing the ICM process once the DSP has been filed.

Accordingly, GBE requests that the OEB: (i) proceed with Phase 1 of the Application in the ordinary course; (ii) hold the ICM portion of the Application in abeyance until GBE files its consolidated DSP in early 2027; and (iii) establish the procedural schedule for Phase 2 following the DSP filing and GBE's notice that the ICM is ready to proceed. As set out in the Application, GBE requests that the ICM phase be heard in writing by a panel of Commissioners.



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This Application covers both rate zones, the former Brantford Power Inc. rate zone (the “GBE(BPI) Rate Zone”) and the former Energy+ Inc. rate zone (the “GBE(E+) Rate Zone”). Distinctions have been made between the two Rate Zones where necessary. The Application is filed pursuant to the Board’s e-Filing Services.

Confidentiality Request

GBE is seeking confidential treatment of the following information and is filing the ICM in confidence pursuant to the Board’s Practice Direction on Confidential Filings (the “Practice Direction”)¹:

Section	Page	Basis for Confidential Treatment
ICM Request, Appendix B-1 Preston TS Breakers & Egress Investment Project Description, Figure 3, p. 9 of 19.	Appendix B-1, page 9 of 19	Appendix “A” to the Practice Direction sets out the Board’s considerations in determining requests for confidentiality. Among those considerations are the following: (c) whether the information pertains to public security or cybersecurity. Figure 3 depicts the routes and locations of GBE’s 21M31, 21M32, 21M33, and 21M34 feeders and illustrates how GBE customers are supplied through the feeders. Disclosure of this information would reveal detailed information regarding the configuration and sources of electricity supply to GBE customers. Making such information publicly available could increase security risks to GBE’s distribution system and its customers by identifying distribution routes and customers. Accordingly, GBE submits that confidential treatment of Figure 1 is warranted on public security and cybersecurity grounds. Moreover, the Board has previously determined that specific information about electricity infrastructure within a utility’s service area should be kept confidential. For instance, see the Board’s February 27, 2024, Decision on Confidentiality in EB-2023-0013, or its February 17, 2022, Decision on Confidentiality in EB-2020-0150.

¹ OEB, Practice Direction on Confidential Filings, December 17, 2021, (“OEB Practice Direction”) online: <https://www.oeb.ca/regulatory-rules-and-documents/rules-codes-and-requirements/practice-direction-confidentialfilings>.

ICM Request, Appendix B-3: GBE's OEB Industry Relations Enquiry 2024-0498	Appendix B-3 GBE's OEB Industry Relations Enquiry 2024-0498, pages 19-34, 43-92, 133-134	Appendix "A" to the Practice Direction sets out the Board's considerations in determining requests for confidentiality. Among those considerations are the following: (e) whether the type of information in question was previously held confidential by the OEB. GrandBridge Energy's October 30, 2025, Supplemental Submission to the OEB was filed with the OEB under privileged and confidential treatment. Hence, GrandBridge Energy is seeking confidential treatment of the content in the Supplemental Submission that is not related to public regional planning documents.
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GBE is prepared to provide copies of the Confidential Material to parties' counsel and experts or consultants to the proceeding, provided that they have executed the Board's form of Declaration and Undertaking with respect to confidentiality and that they comply with the Practice Direction, subject to GBE's right to object to the Board's acceptance of a Declaration and Undertaking from any person. Consistent with the Practice Direction, GBE is filing confidential versions of the Confidential Material and requests that such material be maintained in confidence.

Respectfully submitted,

/s/ Gaetana Girardi

Gaetana Girardi

Director, Regulatory Affairs & Revenue Assurance

c.c. Borden Ladner Gervais, John A.D. Vellone



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