

September 11, 2026

VIA RESS & EMAIL

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Mr. Ritchie Murray, Registrar

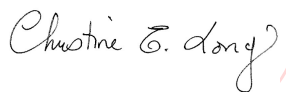
Dear Mr. Murray:

Re: OEB File No. EB-2025-0252, Alectra Utilities Corporation (“Alectra Utilities”) 2027-2031 Custom Rate Application for Electricity Distribution Rates and Charges (the “Application”) – Response to the Letters of Comment

Pursuant to Rule 23 of the OEB’s *Rules of Practice and Procedure*, please find attached Alectra Utilities’ response to the Letters of Comment received from customers from November 2025 to May 2026.

Please let us know if you have any questions or concerns.

Sincerely,

 Digitally signed by Christine E.
Long
Date: 2026.09.11 16:05:50 -04'00'

Christine E. Long
Senior Vice-President Regulatory Affairs and Privacy Officer
Christine.Long@alectrautilities.com

cc: All parties
Natalie Yeates, Alectra Utilities
Charles Keizer, Daliana Coban, and Jonathan Myers, Torys LLP

Re: Alectra Utilities Corporation's 2027-2031 Custom Rate Application (EB-2025-0252)

The Ontario Energy Board ("OEB") received eighty-five (85) Letters of Comment from customers regarding Alectra Utilities' 2027-2031 rate application. Alectra Utilities values all customer feedback and appreciates the time that its customers took to submit their comments. The comments can be grouped into two (2) primary themes. First, most letters (approximately 90%) expressed concern that even modest rate increases will add to the financial strain that households are facing due to the rising cost of living. Second, the letters questioned the need and justification for the proposed rate increase and indicated that rate increases should result in improvements in system reliability, outages and infrastructure.

Alectra Utilities' Response

This application is Alectra Utilities' first rebasing application since the utility was formed through a merger in 2017. Over that period, the utility has invested significantly in core distribution assets in communities across its service territory. The merger has resulted in significant benefits for customers, including cost savings achieved through the consolidation of legacy workforces into regional operations centres, improved outage response through the installation of automated circuit switches on the grid, and the introduction of more on-line digital self-service options to provide 24/7 customer account access. Alectra Utilities' rate application balances the requirement for reliability, grid accessibility, and service affordability that customers expect, and will enable Alectra Utilities to continue to meet its obligations to the homes and businesses the utility serves. Alectra Utilities' proposed investment plan will address these priorities by making the minimum investment necessary to continue to meet immediate challenges, while making measured expenditures to ready the grid for growth.

To have its proposed rates approved, Alectra Utilities is required to submit its plan to the OEB, Ontario's independent energy regulator. The OEB will then review the plan and the proposed rates for 2027–2031 in an open and transparent public process which includes the following steps:

- Alectra Utilities submits an application (a detailed plan) to the OEB that outlines all its costs and plans to maintain the distribution system. Customer input is an essential part of the application process, and Alectra Utilities is accountable to the OEB for considering customer needs and preferences as it develops its plan, and for explaining and demonstrating how customer feedback informed the plan. Further, customer input is based on Alectra Utilities' ongoing engagement with its customers in addition to the specific outreach to its customers during the development of its detailed plan for the application;

- Customers also participate in the process by submitting Letters of Comment with their feedback to the OEB; and
- Various stakeholder groups also participate in the process that represent various customer groups such as low-income customers, school boards, commercial and industrial customers or environmental and conservation groups.

The OEB will only approve Alectra Utilities' application if they find that it results in a reasonable outcome for customers.

The electricity bill includes the cost of the electricity that customers use (the 'Electricity Charges' line), the services Alectra Utilities provides (included in the 'Delivery' line) and other costs (the 'Regulatory Charges' line). A portion of the Delivery Charges, the Customer Service Charge and the Distribution Charge cover the costs for Alectra Utilities to operate and maintain the distribution system that delivers electricity to homes and businesses. The charges on the bill impacted by Alectra Utilities' proposed rates are the Customer Service Charge and the Distribution Charge, which represent approximately 27% of the total bill. Alectra Utilities has applied to the OEB through this application to update these charges and is required to file detailed evidence to support any proposed changes to the charges. The OEB's website includes helpful information for customers on 'Understanding your electricity bill' <https://www.oeb.ca/consumer-information-and-protection/electricity-rates/understanding-your-electricity-bill>

Affordability

Customer support programs

Alectra Utilities continues to focus on fostering affordability and supporting vulnerable customers through initiatives like flexible payment arrangements and customer assistance programs. Alectra Utilities' commitment to meeting all customer needs is reflected in its efforts to improve affordability and support customers in managing their electricity costs, particularly those experiencing financial hardship. Alectra Utilities has prioritized customer assistance through both program delivery and proactive engagement. The utility's Customer Assistance Program ("CAP") team plays an important role, directly engaging with customers who are at risk of disconnection and helping them access support. In 2023, the team implemented an expanded outreach campaign that included outbound calls, email blasts, in-person attendance at community events, and educational seminars for social agencies. This initiative improved awareness and access to energy assistance programs such as the Ontario Electricity Support Program ("OESP") and the Low-Income Energy Assistance Program ("LEAP"). In addition to assistance programs, Alectra Utilities' Collections and Payments

team continues to implement innovative tools and options that promote affordability, convenience, and customer choice. In April 2024, Alectra Utilities launched enhanced payment features in the My Alectra portal, including a digital wallet that allows customers to pay by credit card with real time payment posting. The portal also allows eligible customers to set up automated payment arrangements through Alectra Utilities' Customer Information System ("CIS") and will be further expanded to provide more robust payment notifications. These efforts reflect Alectra Utilities' commitment to fostering affordability, reducing disconnection risk, and providing accessible, user-friendly payment tools for all customers.

Fostering continuous improvement

The OEB expects distributors like Alectra Utilities to demonstrate continuous improvement in productivity and cost performance. Since its formation in 2017, Alectra Utilities has proven to be a strong performer, providing safe and reliable service for customers in a cost-effective manner.

Even with significant cost pressures due to inflation which has increased the baseline cost of Alectra Utilities' business from end-to-end, inclusive of materials, labour, services and other costs, Alectra Utilities' costs have historically been lower than expected for a utility of similar size. Alectra Utilities has and will continue to place emphasis on the pursuit of productivity savings as a means to mitigate cost pressures and provide value for its customers.

Justification for Alectra Utilities' proposed investments

Key objectives and outcomes for customers

To ensure the utility can continue delivering electricity safely and reliably for years to come, Alectra Utilities developed a five-year investment plan for 2027-2031. With input from customers and business experts, and in accordance with regulatory requirements, Alectra Utilities developed its plan to address the following challenges ahead:

- **Renewing and replacing deteriorating infrastructure**

Alectra Utilities has consistently invested in the upkeep of its deteriorating infrastructure and improved the performance of its system since its formation in 2017. Moving forward, Alectra Utilities will continue to focus on renewing deteriorating and obsolete equipment. This will help minimize the risk of outages, ensure safe operations, and mitigate environmental hazards posed by old equipment such as underground cables, deteriorating poles, and meters at the end of their useful life.

- **Meeting growing electricity demand**

As the communities within its service territory continue to grow, and more customers turn to electricity to power their homes, vehicles and businesses, Alectra Utilities has a critical role to play in expanding and enhancing the local grid so that customers can continue to plug in safely and reliably.

- **Enabling Resiliency and Modernization**

As more customers plug into electrified technologies, including electric vehicles and heat pumps, Alectra Utilities needs to invest in building a more intelligent and resilient grid. This includes Distributed Energy Resources (“DERs”), like onsite battery storage or vehicle-to-grid charging stations, that can send electricity back to the grid. Alectra Utilities also needs to integrate new smart grid technologies that can help restore power to customers faster during outages. These necessary investments will strengthen or “harden” the grid against extreme weather and potential cyber-attacks.

Alectra Utilities recognizes the importance of reliability-driven investments to customers. Customer engagement feedback shows that residential customers prioritize reducing both restoration time and the number of outages during extreme weather events, while business customers identified power quality as a top reliability priority. During the 2027-2031 period, Alectra Utilities will prioritize investments that target deteriorated direct-buried cables, cable accessories and deteriorating overhead infrastructure, which are the primary contributors to declining system reliability. Alectra Utilities’ plan outlines the necessary effort to renew a significant backlog of deteriorated infrastructure at risk of failure while balancing the evolving challenge of servicing growing communities in its service area. In addition, the plan enables Alectra Utilities to incorporate climate resiliency and grid modernization, providing greater grid flexibility, reducing various risks (including system reliability, safety, and environment) while building the capability to integrate emerging technologies.

Customer input and customer communication

Customer input is an essential part of the application process. Ensuring customers were engaged and informed through the process was a key priority for the utility. During 2024 and early 2025, feedback was gathered from 61,135 Alectra Utilities customers as part of the utility’s application-specific customer engagement efforts. This engagement represented the largest customer engagement in the Ontario utility industry. The engagement process itself was well received by

customers. An average of 82% of customers had a favourable impression of the engagement survey, and 75% of customers felt the amount of information provided was appropriate.

In addition to the application-specific customer engagement, Alectra Utilities leveraged its website, customer newsletters, email marketing, and social media platforms to inform customers about the application and the application process. Alectra Utilities' website includes a plain-language summary of its investment plan and an accompanying short video. The summary outlines the three priorities for the 2027–2031 rate term: i) renewing and replacing infrastructure, ii) meeting growing electricity demand, and iii) enabling resiliency and modernization. The [webpage](#) also provides a high-level overview of the rate application process, proposed rate impacts, and the utility's strategic priorities.

Alectra Utilities' Custom Performance Scorecard – a commitment to tangible outcomes for customers

As part of the application, Alectra Utilities proposed a Scorecard that will require the utility to achieve targeted outcomes over the 2027-2031 rate term. In doing so, Alectra Utilities has committed to customers that the proposed capital budget will result in tangible outcomes geared to addressing reliability and quality of service. The Scorecard includes performance measures for Reliability, Cost Control, Infrastructure Renewal, Automation and Meeting Capacity Needs.