



From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Tuesday, October 6, 2026 2:40 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: Webmaster <Webmaster@oeb.ca>
Subject: Redacted - Letter of Comment Submitted: EB-2026-0052

LETTER OF COMMENT

Comments:

We are writing to provide comments regarding InnPower Corporation's proposed 2027 electricity distribution rates and their impact on the operation and continued investment in public EV charging infrastructure within InnPower's service territory. Our company operates public EV charging infrastructure in Canada and is actively investing in the development and expansion of Ontario's EV charging network. We currently operate EV charging facilities within InnPower's service territory and are therefore directly exposed to the proposed 2027 rates. We do not support the proposed 2027 rate increases as filed. Based on our analysis of the proposed rates and our existing operating profile, we estimate that the proposed 2027 rates would increase the electricity distribution-related costs of our existing EV charging operations by approximately 20%. This represents a material increase in a recurring operating cost for an EV charging operator, for whom electricity is a fundamental input to the service provided to customers. We recognize InnPower's responsibility to maintain a safe, reliable and financially sustainable electricity distribution system and to recover its prudently incurred costs. However, we believe the OEB should carefully consider the impact of the proposed increases on customers such as EV charging operators, for whom electricity costs directly affect the cost and economics of providing public charging services. Unlike many commercial businesses, an EV charging operator purchases electricity specifically to deliver electricity to its customers. Increases in electricity distribution costs therefore directly increase the cost of providing charging services. While some portion of increased costs may ultimately be reflected in charging prices, an operator's ability to fully pass through those costs is constrained by competition among charging locations. EV drivers can be price-sensitive and may choose alternative charging locations when there are meaningful differences in charging prices. As a result, higher electricity costs could place upward pressure on charging prices, shift charging demand to competing locations and reduce utilization at affected facilities. This is particularly important for higher-powered DC fast-charging infrastructure, which requires substantial upfront capital investment and electrical capacity, while utilization at new locations typically takes time to develop. For existing facilities, higher recurring electricity costs can place additional pressure on operating margins, charging prices and utilization. For future facilities, those same costs can affect whether a project remains economically viable given the substantial capital required to develop and operate it. These factors can influence decisions to proceed with, delay or scale back investment in additional public charging infrastructure. >From a broader infrastructure perspective, an economically sustainable operating environment is important to the continued expansion of Ontario's public EV charging

network. Operators must balance substantial upfront capital requirements with recurring operating costs, competitive charging prices and the time required for utilization to develop. Electricity costs are therefore an important consideration when evaluating the location, capacity and financial feasibility of new charging facilities. Our company remains committed to investing in EV charging infrastructure in Ontario. However, continued investment depends on the ability to develop and operate charging facilities at costs that allow charging prices to remain competitive while supporting the long-term viability of the infrastructure. We therefore respectfully request that the OEB not approve InnPower's proposed 2027 rates as filed. We encourage the OEB to consider whether the proposed increases can be reduced or otherwise modified to mitigate their impact on existing EV charging operations and preserve the economic feasibility of continued investment in public EV charging infrastructure. We appreciate the opportunity to provide these comments and respectfully request that the OEB take the considerations outlined above into account in its review of InnPower's 2027 rate application.

Name: Josy Abraham

Do you reside in the impacted service area?: No

Was AI used for the letter of comment?: Yes