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BY EMAIL and RESS
November 10, 2026

Mr. Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

EB-2026-0056 London Hydro Inc. (London Hydro) 2027 Electricity Distribution Rates Application – Building Owners and Managers Association Toronto (BOMA Toronto) Interrogatories

Attached are the interrogatories of BOMA Toronto to London Hydro.

Sincerely,



Clement Li
Consultant for BOMA Toronto
Director, Policy & Regulatory Development
Enerlife Consulting Inc.
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EB-2026-0056 London Hydro Inc. (London Hydro)

Application for electricity distribution rates and other charges beginning May 1, 2027

Building Owners and Managers Association Toronto (BOMA Toronto) Interrogatories

1-BOMA-1

References:

#1**:** Exhibit 1, p. 25, Table 1-1

#2**:** Exhibit 1, p. 64, Table 1-14

Preamble:

London Hydro requests an overall rate increase of 18.56%. Table 1-14 shows the distribution-only (Sub-total A) increase for the GS 50 to 4,999 kW class is $1,159.09 per month, or 41.5%, for the typical customer. The increase is 39.5% for the smaller customer profile. The Residential increase is 21.6%.

Questions:

(a) Please provide an estimated breakdown of the 41.5% Sub-total A increase for the GS 50 to 4,999 kW class, in percentages, into: (i) the increase in the base revenue requirement; (ii) changes in the cost allocation model since EB-2021-0041 (e.g. load profiles, weighting factors, customer and demand data); (iii) the proposed revenue-to-cost ratio adjustment; and (iv) changes in the class billing determinants.

(b) Please provide the same estimated breakdown for the Large Use class (33.0% sub-total A increase).

(c) Please provide the distribution-only (i.e. Sub-total A) and total bill impacts for GS 50 to 4,999 kW customers at 75 kW, 1,000 kW, and 3,500 kW (with appropriate load factors).

1-BOMA-2

References:

#1**:** Exhibit 1, pages 158 and 160 to 162

#2**:** Exhibit 1, Appendix 1-10, Page 11

Preamble:

In Exhibit 1, London Hydro states that it took on “an expanded leadership role in regional and provincial DSM collaboration” in 2026. It also participated in the eDSM Legal Subgroup on Non-Wires Solutions guidelines. Its 2024 application to the IESO Grid Innovation Fund to pilot a residential electric water-heating demand-shift initiative was unsuccessful. At the Distribution System Plan Customer Feedback

survey, London Hydro reported that 50% of large C&I customers are "ready to participate in demand response" and 60% "have or are considering DERs".

Questions:

(a) Please list any LDC-delivered or locally targeted eDSM or demand response programs London Hydro plans to offer to commercial customers in 2027–2031. Provide the budget, funding source (IESO or distribution rates), target customers, and expected kW reduction for each program. If none, please explain why.

(b) Has London Hydro applied, or does it plan to apply, for IESO funding (e.g., Local Initiatives or Grid Innovation Fund) for a program targeting commercial customers on constrained feeders or stations? Please describe it. If not, please explain why.

(c) Has London Hydro considered a commercial-building demand response pilot, similar to the residential water-heating pilot? If not, please explain why.

2-BOMA-3

References:

#1**:** Distribution System Plan Section 5.3.2c.2, Tables 47 and 48, pages 143 to 147

#2**:** Distribution System Plan Section 5.3.5, pages 194 to 196

Preamble:

Nine of 60 feeders exceeded 90% utilization at the 2024 coincident peak. Five exceeded 100%: Talbot 26M56 (125%), Talbot 26M42 (117%), Buchanan 19M25 (105%), Clarke 70M3 (105%), and Wonderland 32M5 (101%). London Hydro states that it evaluates "opportunities to leverage eDSM and DERs to supply excess short-term demand". It also states that the BCA Framework is mandatory where projected capital cost "exceeds $2 million, excluding general plant investments", and that "no distribution rate-funded NWS projects are proposed within the 2027–2031 DSP".

Questions:

(a) For each of the nine feeders that exceeded 90% utilization, please identify the planned solution to the capacity need and whether its estimated cost is below the $2 million threshold for a mandatory BCA. For each need below the threshold, please explain whether London Hydro considered any NWS, including demand response from commercial customers served by the feeder. If not, please explain why.

3-BOMA-4

References:

#1: Exhibit 3, Appendix 3-1, Tables 4, 6, and 28 to 30

#2: Exhibit 1, Appendix 1-10, pages 3 and 6

Preamble:

Before the eDSM adjustment, the 2027 forecast for the GS 50 to 4,999 kW class is 1,470,577,777 kWh and 3,721,093 kW (Tables 28 and 30), close to 2025 actuals of 1,470,647,189 kWh and 3,705,957 kW (Tables 4 and 6). After the eDSM adjustment, the forecast is 1,445,764,307 kWh and 3,658,332 kW (Tables 4 and 6). London Hydro applies the 2021–2025 geometric mean growth rate to the GS 50 to 4,999 kW class, which holds the forecast at 1,519 customers in 2026 and 2027 (Table 29). The class declined by 3.6% in 2022 but grew from 1,464 customers in 2023 to 1,520 in 2025. At the Customer Feedback survey, 13 of 19 respondents (68%) expected their peak load to increase (Appendix 1-10, pages 3 and 6).

Questions:

(a) Please explain why 2021 was chosen as the starting year for the GS 50 to 4,999 kW customer growth rate, given the decline in 2022. Please provide the 2026 and 2027 customer forecasts, and the resulting kWh and kW forecasts, using growth from 2022–2025 and from 2023–2025.

(b) Please provide actual 2026 year-to-date GS 50 to 4,999 kW kWh, billed kW, and customer counts, compared with the 2026 Bridge Year forecast for the same months.

(c) How did London Hydro reflect the growth expectations of large C&I customers (Appendix 1-10, p. 6) in the rate class forecast? Please identify any known new GS 50 to 4,999 kW connections or load additions for 2026–2027 and whether they are included.

3-BOMA-5

References:

#1: Exhibit 3, Appendix 3-1, Tables 28, 30, 52 and 53, pages 33 to 35 and 53

#2: Exhibit 3, Appendix 3-1, Section 5.2, page 54

#3: Exhibit 7, Appendix 7-2, page 5

Preamble:

Heating electrification loads are added only to the Residential and GS < 50 kW classes (Appendix 3-1, page 54). For GS 50 to 4,999 kW, Table 30 adds 3,200 kW of additional load in 2027 (2,777 kW in 2026), and Table 28 adds 654,501 kWh (304,054 kWh in 2026). Table 53 shows EV loads for the class of 2,380 kW and 260,574 kWh in 2027 (2,142 kW and 234,507 kWh in 2026), based on an assumed 15% load

factor. Appendix 7-2 adds EV load to the load profiles using a New York State residential EV charging profile and states that the General Service profiles are derived by the same methodology (page 5).

Questions:

(a) Please reconcile the GS 50 to 4,999 kW additional loads in Tables 28 and 30 with the EV loads in Table 53 for 2026 and 2027, and identify the source of the additional loads that are not EV charging.

(b) Why does the forecast include no building electrification (e.g. heat pumps) for GS 50 to 4,999 kW and Large Use customers? What evidence did London Hydro use to conclude that these loads are immaterial in 2027?

(c) Please explain the source of the 15% load factor for commercial EV charging.

(d) Please confirm which EV charging profile was used for the GS 50 to 4,999 kW class in the cost allocation load profiles. If it was the residential profile, please explain why it is appropriate for commercial and fleet charging, and the effect on the class's allocators of using a commercial or fleet charging profile.

7-BOMA-6

References:

#1: Exhibit 1, page 60 Table 1-11

#2: Exhibit 7, Section 7.4, Tables 7-7 and 7-8, pages 14 to 16

Preamble:

At status quo, the GS 50 to 4,999 kW revenue-to-cost ratio is 82.66%, inside the OEB's 80–120% policy range. London Hydro proposes to raise it to 89.74% so that the GS < 50 kW (130.89%) and Street Light (156.94%) classes can be reduced to 120%. As a result, GS 50 to 4,999 kW base revenue increases from $19,299,783 to $21,101,697. Residential (99.94%), Large Use (95.96%), and Sentinel Lighting (96.68%) are also below 100% but receive no increase.

Questions:

(a) Please explain why the revenue shortfall from reducing the GS < 50 kW and Street Light ratios is assigned only to the GS 50 to 4,999 kW and Unmetered Scattered Load classes. Why is it not shared by all classes below 100%?

(b) Please provide revenue-to-cost ratios, class revenues, and GS 50 to 4,999 kW bill impacts (as in Table 1-14) if the shortfall is shared by all classes with status quo revenue-to-cost ratios below 100% (i.e. Residential, GS 50 to 4,999 kW, Large Use >5MW, Sentinel and Unmetered Scattered Load).

8-BOMA-7

References:

#1: Exhibit 8, pages 8 to 11, Tables 8-3, 8-4 and 8-6

#2: Exhibit 1, page 61, Table 1-12

Preamble:

London Hydro proposes to keep the current fixed/variable split for GS 50 to 4,999 kW (19.9% fixed, 80.1% variable). The monthly service charge rises from $177.28 to $230.37 (30%), and the volumetric rate from $3.7344/kW to $4.7883/kW (28%). Table 8-6 shows a ceiling of $31.60 for the class, so the proposed charge is more than seven times the ceiling. London Hydro attributes the atypical floor and ceiling values to its high forecast Late Payment Penalty revenue and the low book value of meters (p. 10).

Questions:

(a) Did London Hydro consider using the ceiling of $31.60/month to set the fixed service charge for the GS 50 to 4,999 kW class? If not, please explain.