

Brooklin Landowners Group

Supplementary Responses to Interrogatories from

Consumers Council of Canada

Interrogatory CCC-03

Appendix B, p. 7

Please provide a list of the developers included in the Brooklin Landowners Group Inc. Please explain how Elexicon determined which developers would be participants in the Sustainable Brooklin Project. Will other developers within Elexicon's franchise area have access to the same conditions? If not, why not? Please quantify the financial benefit each of those chosen developers is receiving from the project and who is providing that benefit (ratepayers, shareholders, NRCan?)

Response of Elexicon Energy Inc

Please see Attachment 1 of the letter of intervention for the Brooklin Landowner's Group to find a list of developers included within Brooklin Landowner's Group.

Elexicon has requested a condition of the OEB's approval of the Distribution System Code exemption be that all developers that may stand to benefit from the Brooklin Line construct DER and EV ready homes or buildings. This condition would apply to all developers in the area affected, regardless of whether or not they are members of the Brooklin Landowner's Group. Elexicon did not determine or select developers who would be participants in the Sustainable Brooklin Project, nor did Elexicon have a hand in determining what developers would or could join the Brooklin Landowners Group.

The Brooklin Developers have committed to incur a cost estimated at \$2,260 per DER and EV constructed home, and they forecast to build between 10,000 and 11,200 homes, resulting in a total financial investment of approximately \$20MM to \$30MM. The total estimated cost of the Brooklin Line is \$26.6MM. In Elexicon's assessment, it is uncertain whether there would be a financial benefit to developers, and to which developers it would accrue.

Supplementary Response of Brooklin Landowners Group

The Brooklin Landowners Group agrees with the response to this question provided by Elexicon and would add the following:

- The landowners comprising the Brooklin Landowners Group are those developers who are proceeding with development of the North Brooklin area at this time. The Brooklin Landowners Group did not exclude any landowners or developers who are currently developing lands in the Community of North Brooklin.
- We do not understand the reference, in the question, to "financial benefit". None of the members of the Brooklin Landowners Group will financially benefit if the Board approves Elexicon's

applications for a Sustainable Brooklin ICM and exemptions from the *Distribution System Code*. Rather, the cost of bringing electricity supply to the new Community of North Brooklin will be allocated appropriately, in accordance with regulatory principles of fairness and equity. Moreover, Elexicon and its ratepayers will benefit from the commitment of the Brooklin landowners to invest approximately \$23 million in DER and EV enablements, as part of the standard new home offering, providing a catalyst to innovation and transformational change within the Elexicon service territory.

Brooklin Landowners Group

Supplementary Answers to Interrogatory from

Consumers Council of Canada

Interrogatory CCC-04

Appendix B, pp. 7/8 The evidence states that Elexicon will provide capacity to a group of residential developers represented by the Brooklin Landowners Group Inc. (BLGI)

c) Please provide a list of all of the participating developers and the number of homes each developer will construct in Brooklin.

Response of Elexicon Energy Inc:

c) See response CCMBC-2 part b for a list of all members of BLGI. Elexicon does not have information on the number of homes each specific developer will construct in Brooklin.

Supplementary Response of Brooklin Landowners Group:

c) Please see **Attachment 1** to this response for a breakdown of the dwelling units that are forecast to be constructed by each member of the Brooklin Landowners Group.

CCC-04

Attachment 1

Unit Breakdown by Type and Phase

Landowner	Phase 1						Phase 2						Phase 3						Total					
	Singles	Semis	Medium Density Units	High Density Units	Mixed Use Units	Total Units	Singles	Semis	Medium Density Units	High Density Units	Mixed Use Units	Total Units	Singles	Semis	Medium Density Units	High Density Units	Mixed Use Units	Total Units	Singles	Semis	Medium Density Units	High Density Units	Mixed Use Units	Total Units
Brooklin (AD) Limited Partnership, 1955551 Ontario Inc.	0		0	0	0	0	126	22	195	0	0	343	50	8	0	0	0	58	175	30	195	0	0	401
Brookvalley	825	138	321	0	0	1,285	687	188	400	42	42	1,358	394	70	137	0	49	650	1,907	396	859	42	91	3,293
Brooklin Development General Partner Ltd., Brooklin Development LP	336	124	143	0	0	603	278	124	260	0	0	662	0	0	0	0	0	0	614	248	403	0	0	1,265
Brooklin Northeast Developments CR Inc. - Draft Plan	373		138	0	0	511	37		0	0	0	37	0		0	0	0	0	410	0	138	0	0	548
Brooklin Northeast Developments CR Inc.	36		4	0	0	40	109	18	17	0	0	144	0		0	0	0	0	145	18	21	0	0	185
Brookvalley Developments Inc.	0		0	0	0	0	0	0	0	0	42	42	0		0	0	49	49	0	0	0	0	91	91
Brookvalley Developments North Inc.	80	14	37	0	0	131	106	18	91	42	0	256	0		0	0	0	0	186	32	127	42	0	387
East Valley Farms Ltd. - Draft Plan	0		0	0	0	0	0	0	30	0	0	30	0		0	0	0	0	0	0	30	0	0	30
East Valley Farms Ltd.	0		0	0	0	0	157	28	2	0	0	187	394	70	137	0	0	601	551	98	140	0	0	789
Fieldgate	53	62	184	52	0	351	433	40	292	194	135	1,095	559	62	187	119	173	1,100	1,045	164	663	366	308	2,546
625 Columbs Developments Ltd.	51		86	0	0	137	70		105	111	0	286	0		0	0	0	0	121	0	191	111	0	423
710 Columbus Holdings Ltd.			0	0	0	0			0	0	0	0			0	0	70	70	0	0	0	0	70	70
7150 Thicksen Developments Ltd.	2	62	98	52	0	214	0		0	0	0	0	0		0	0	0	0	2	62	98	52	0	214
740 Columbus Developments Ltd.			0	0	0	0			0	0	0	0			3	0	0	3	0	0	3	0	0	3
Whitby Con Seven Developments Ltd.			0	0	0	0	344	40	187	83	135	790	446	62	92	0	29	629	790	102	279	83	165	1,419
Whitby Country Lane Developments Ltd.			0	0	0	0	19		0	0	0	19			0	0	0	0	19	0	0	0	0	19
6800 County Lane Developments Ltd.			0	0	0	0			0	0	0	0	46		11	0	0	57	46	0	11	0	0	57
7081 Cochrane Developments Ltd.			0	0	0	0			0	0	0	0			27	13	74	114	0	0	27	13	74	114
7261 Cochrane Developments Ltd			0	0	0	0			0	0	0	0			0	0	0	0	0	0	0	0	0	0
7321 Conchrane Developments Ltd.			0	0	0	0			0	0	0	0	20		0	0	0	20	20	0	0	0	0	20
Revesciata Estate Corp			0	0	0	0			0	0	0	0	47		54	106	0	207	47	0	54	106	0	207
Lakeview Homes Inc. (2068681 Ontario Inc)	131		92	0	0	223	185		28	0	0	213	0		0	0	0	0	316	0	119	0	0	435
Mattamy	0	0	0	0	0	0	521	0	108	0	0	629	367	0	185	0	0	552	888	0	293	0	0	1,181
Mattamy (Brooklin) Ltd.	0		0	0	0	0	218		108	0	0	326	0		0	0	0	0	218	0	108	0	0	326
Mattamy (Thickson) Ltd.	0		0	0	0	0	303		0	0	0	303	367		185	0	0	552	670	0	185	0	0	855
North Whitby & Brooklin Holdings Inc	0	0	0	0	0	0	81	10	52	0	64	208	75	0	17	12	0	105	156	10	69	12	64	313
7510 Thicksen Rd Holdings Inc.	0		0	0	0	0	18		0	0	0	18	0		0	0	0	0	18	0	0	0	0	18
North Brooklin Holdings Inc.	0		0	0	0	0	0		0	0	0	0	75		17	12	0	105	75	0	17	12	0	105
North Whitby Holdings Inc.	0		0	0	0	0	63	10	52	0	64	190	0		0	0	0	0	63	10	52	0	64	190
Sorbara/Tribute (Abacus Equity Infusion Ltd)	225		203	225	0	653	94		42	0	0	136	0		0	0	0	0	319	0	245	225	0	789
Tercot Communities (Whitby Ashburn Holdings Inc.)	0		0	0	0	0	18		2	0	0	20	12		0	0	0	12	30	0	2	0	0	33
XARCH CAPITAL CORP.	24		47	0	0	72	0		0	0	0	0	97		16	13	154	0	280	121	16	61	154	351
Total Participating Landowners	1258	200	848	277	0	2583	2145	260	1119	236	241	4001	1555	155	539	286	222	2757	4958	616	2506	798	463	9342
Total Non-Participating Landowners	417	74	243	93	99	926	236	40	130	18	196	620	212	37	213	101	45	609	865	151	586	212	340	2,155
Total North Brooklin	1,675	274	1,091	370	99	3,509	2,381	300	1,249	254	438	4,621	1,767	192	753	387	267	3,366	5,823	767	3,093	1,010	803	11,496

Blue - data submitted/planned within draft plans

Assumed 85% singles and 15% semis where low density units was higher than 40

Low and Medium Density Units Only

Landowner	Phase 1				Phase 2				Phase 3				Total			
	Singles	Semis	Towns	Total Units	Singles	Semis	Towns	Total Units	Singles	Semis	Towns	Total Units	Singles	Semis	Towns	Total Units
Brooklin (AD) Limited Partnership, 1955551 Ontario Inc.	0	0	0	0	126	22	195	343	50	8	0	58	175	30	195	401
Brookvalley	825	138	321	1,285	687	188	400	1,275	394	70	137	601	1,907	396	859	3,161
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Brooklin Northeast Developments CR Inc.	36.24	0	4.04	40	109	18	17	144	0	0	0	0	145	18	21	185
Brookvalley Developments Inc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Brookvalley Developments North Inc.	80	14	37	131	106	18	91	215	0	0	0	0	186	32	127	345
East Valley Farms Ltd. - Draft Plan	0	0	0	0	0	0	30	30	0	0	0	0	0	0	30	30
East Valley Farms Ltd.	0	0	0	0	157	28	2	187	394	70	137	601	551	98	140	789
Fieldgate	53	62	184	299	433	40	292	765	559	62	187	808	1,045	164	663	1,872
625 Columbs Developments Ltd.	51	0	86	137	70	0	105	175	0	0	0	0	121	0	191	312
710 Columbus Holdings Ltd.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7150 Thicksen Developments Ltd.	2	62	98	162	0	0	0	0	0	0	0	0	2	62	98	162
740 Columbus Developments Ltd.	0	0	0	0	0	0	0	0	3	0	0	3	0	0	3	3
Whitby Con Seven Developments Ltd.	0	0	0	0	344	40	187	571	446	62	92	600	790	102	279	1,171
Whitby Country Lane Developments Ltd.	0	0	0	0	19	0	0	19	0	0	0	0	19	0	0	19
6800 County Lane Developments Ltd.	0	0	0	0	0	0	0	0	46	0	11	57	46	0	11	57
7081 Cochrane Developments Ltd.	0	0	0	0	0	0	0	0	0	0	27	27	0	0	27	27
7261 Cochrane Developments Ltd	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7321 Conchrane Developments Ltd.	0	0	0	0	0	0	0	0	20	0	0	20	20	0	0	20
Revesciata Estate Corp	0	0	0	0	0	0	0	0	47	0	54	101	47	0	54	101
Lakeview Homes Inc. (2068681 Ontario Inc)	131	0	92	223	185	0	28	213	0	0	0	0	316	0	119	435
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Mattamy (Brooklin) Ltd.	0	0	0	0	218	0	108	326	0	0	0	0	218	0	108	326
Mattamy (Thickson) Ltd.	0	0	0	0	303	0	0	303	367	0	185	552	670	0	185	855

North Whitby & Brooklin Holdings Inc	0	0	0	0	81	10	52	144	75	0	17	92	156	10	69	236
7510 Thickson Rd Holdings Inc.	0	0	0	0	18	0	0	18	0	0	0	0	18	0	0	18
North Brooklin Holdings Inc.	0	0	0	0	0	0	0	0	75	0	17	92	75	0	17	92
North Whitby Holdings Inc.	0	0	0	0	63	10	52	126	0	0	0	0	63	10	52	126
Sorbara/Tribute (Abacus Equity Infusion Ltd)	225	0	203	428	94	0	42	136	0	0	0	0	319	0	245	564
Tercot Communities (Whitby Ashburn Holdings Inc.)	0	0	0	0	18	0	2	20	12	0	0	12	30	0	2	33
XARCH CAPITAL CORP.	24	0	47	72	0	0	0	0	97	16	13	126	121	16	61	198
Total Participating Landowners	1,258	200	848	2,306	2,145	260	1,119	3,524	1,555	155	539	2,250	4,958	616	2,506	8,080
Total Non-Participating Landowners	417	74	243	734	236	40	130	406	212	37	213	462	865	151	586	1,603
Total North Brooklin	1,675	274	1,091	3,041	2,381	300	1,249	3,930	1,767	192	753	2,712	5,823	767	3,093	9,683

Notes: Assumed 85% singles and 15% semis split of low density units where total is higher than 40 and no draft plan info is available.

Brooklin Landowners Group

Supplementary Responses to Interrogatories from

Consumers Council of Canada

Interrogatory CCC-07

Appendix B, p. 10

a) “The commitment by the Developers to invest approximately \$30.4 million over a 20-year period in DER and EV-enabling infrastructure in newly constructed homes in North Brooklin will lower barriers to entry for customers wishing to install DER and EV infrastructure in their newly purchased homes. ICM funding for the Sustainable Brooklin Project will guarantee this investment of private sector capital.” a) Please explain how the \$30.4 million was calculated;

b) Please explain why developers would not invest in DER and EV-enabling in the absence of the ICM funding.

Response of Elexicon Energy Inc.

a) As per Figure 2 in Appendix B p. 45, \$30.4 million is calculated based on the developers’ cost estimate of \$2,260 per home multiplied by a high-unit estimate of 11,217, and a 20% increase to account for future increases in material costs and inflation.

Supplementary Response of Brooklin Landowners Group

a) Please see the Supplementary Response of Brooklin Landowners Group to 1-Staff-17(b) for a detailed breakdown of the cost estimate for installing DER and EV enablements in homes to be constructed in the new Community of North Brooklin.

b) Please see the Supplementary Response of Brooklin Landowners Group to 1-Staff-17(b).

Brooklin Landowners Group

Supplementary Answers to Interrogatory from

Consumers Council of Canada

Interrogatory CCC-18

Appendix B, p. 47

“Absent the DSC exemption, the Developers would otherwise be required to pay a capital contribution for construction of the Brooklin Line and the Developers would no longer be willing to commit to invest in building DER and EV ready homes across all of North Brooklin.”

- a) Please provide evidence to support this claim;
- b) Why would the Developers not be willing to pay a portion of the capital contribution?
- c) Did Elexicon pursue a sharing arrangement – whereby the Developers paid a portion of the capital contribution? If not, why not? Why is “all or nothing” necessarily appropriate?

Response of Elexicon Energy Inc.

- a) None provided.
- b) None provided.
- c) None provided.

Supplementary Response of Brooklin Landowners Group

a) As has been explained in responses to questions from OEB Staff (see Response to 1-Staff-17), the estimated total cost of constructing both the Phase 1 Project and the Phase 2 Project is approximately \$41 million. If the Brooklin Landowners incur this cost, they will seek to recover the associated financing costs in the asking price of the new houses. In order to remain competitive in the housing market in the Greater Toronto Area, the Brooklin Landowners will need to find ways to offset these financing costs by controlling or cutting costs in other areas, including the discretionary cost of installing/constructing DER and EV enablements as part of a standard, new house offering.

b) Please see the Supplementary Responses of the Brooklin Landowners Group to Staff-12, 15 and 17.

c) The Brooklin Landowners Group is not aware of any provision in the *Distribution System Code* that gives a distributor the discretions to include only a portion of the forecast capital cost in the calculation of the capital contribution that will be required from a load customer, in accordance with Appendix B of the Code.