

Brooklin Landowners Group

Supplementary Responses to Interrogatories from

Environmental Defence

Interrogatory ED-02

Reference: Appendix B – Incremental Capital Module Whitby Smart Grid & Sustainable Brooklin

a) Per page 47: “Homeowners that are not able to purchase DER-and-EV-Ready homes are forced to undergo expensive retrofits to accommodate the installation of Solar PV, battery storage, or electric vehicle charging infrastructure.” Please provide a rough estimate of the number of customers that will avoid those retrofits, the approximate cost of those retrofits, and the total savings (over 20 years). We understand that this will involve significant uncertainty – please provide caveats and or a range of outcomes if that assists in addressing the uncertainty.

Response of Ellexicon Energy Inc.

a) Ellexicon’s rough estimate of the minimum number of customers that would avoid costly retrofits is 700+ per year for 16 years. This estimate represents the Brooklin Landowner’s Group’s projected annual new home construction in North Brooklin. Ellexicon does not have home retrofit costs or the total savings. Ellexicon does not have a cost estimate for building retrofits to accommodate solar PV, battery storage or electric vehicle charging. Ellexicon is not active in the building retrofit market. The only estimates which Ellexicon has available are the costs to rough-in for the new builds provided by the Brooklin Developers included at Figure 2 of Appendix B of the Application.

Supplementary Response of Brooklin Landowners Group

a) In response to the question posed, the Brooklin Landowners Group would add the following:

- As stated in the Supplementary Response to 1-Staff-20(a), the experience of the members of the Brooklin Landowners Group suggests that given a choice between paying for upgrades that provide a tangible and visible benefits (e.g., marble countertops) and paying for upgrades that provide intangible and/or invisible benefits (e.g., energy savings), most home buyers will choose the former. This, in turn, suggests that the uptake of DER and EV options (i.e., if not part of the standard offering) would be very low, although it is impossible to estimate this with any degree of precision.
- It is difficult to quantify the cost of retrofitting new homes to install, after the fact, the DER and EV features that are being proposed by the Brooklin landowners, as part of their standard offering. The starting point of such an estimate would be the Brooklin landowners’ own estimate of the cost of installing/constructing the DER and EV as part of the original construction; i.e., \$2000 plus HST per unit (see Supplementary Response to 1-Staff-17(b)). To this dollar estimate must be added the cost of opening walls in the basement, main floor and upper floors; cutting through existing beams and studs; repairing or replacing damaged walls, beams, etc.; and painting repaired

walls. Anyone who has gone through the process of removing “knob and tube” wiring from an older home knows what all of this entails.

- Given that each home will be differently configured, it is not possible to estimate the costs for such retrofits, other than to state, with confidence, that such costs will be materially more than the original cost of installation/construction, by a factor of at least 300 per cent.
- Under the circumstances, it is fair to say that the retrofit option is unlikely to be attractive to most home owners/buyers.

Brooklin Landowners Group

Supplementary Responses to Interrogatories from

Environmental Defence

Interrogatory ED-04

Reference: Appendix B-2 Sustainable Brooklin Business Case

c) Per page 14: "Where the roof size and orientation are suitable, the Brooklin Developers will offer customers the option to purchase and install solar panels and related inverter and controls." What percent of homes will have a roof size and orientation suitable for solar? Is Elexicon willing to seek a specific commitment that developments will be designed such that, say, 95% of homes have a roof that is suitable for solar in order to maximize the benefits of this project?

e) What recourse does Elexicon have if a developer declines to fulfil one of the specific undertakings described on page 14-15? Are those undertakings contained in a formal agreement? If yes, please provide a copy.

Response of Elexicon Energy Inc

c) Elexicon would not support the proposed commitment as outlined in the question, understanding that developers and the municipality must balance numerous constraints in designing and approving a development (e.g. natural environmental characteristics, transportation conduits), and a generic commitment uninformed by the specifics of the development may inadvertently negatively impact other important outcomes for the municipality (e.g., environmental protection, density targets, project timelines).

e) Elexicon has requested a condition of approval in its Application (Appendix B at page 8), which, if approved by the OEB, would be enforced by Elexicon by way of a yet to be drafted commercial agreement with all developers in the North Brooklin territory. Elexicon will utilize all remedies included within the agreement and the OEB's decision and order should a developer decline to fulfill any of the conditions of approval.

Supplementary Response of Brooklin Landowners Group

c) Please see the Supplemental Response of Brooklin Landowners Group to 1-Staff-24(g).

e) Please see the Supplemental Response of Brooklin Landowners Group to 1-Staff-17(c).