



January 20, 2025

VIA E-MAIL

Ms. Nancy Marconi
Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Ms. Marconi:

**Re: EB-2024-0022/0096 Essex Powerlines Corporation (EPLC)
Response respect to PowerShare Distribution System Operator (DSO) Pilot Project**

On January 14, 2024 the Board wrote to the School Energy Coalition (SEC) and VECC inviting the intervenors and OEB staff to comment on the implications of Essex Powerlines request to withdraw its 2025 capital additions related to the PowerShare DSO pilot project and amend the terms of the PowerShare DVA. The Board also invited Staff and the intervenors to indicate whether further information is needed in relation to the requests filed by Essex Powerlines.

We have reviewed the comments filed by SEC on this matter and we agree with them. In our submissions of July 25, 2024 on the matter of the PowerShare DVA we expressed the view that the Board should not approve the permanent PowerShare DVA and because there is no evidence that the project represents is a prudent financial investment for the service of electricity distribution to EPLC's ratepayers. We further objected to inclusion in rate base of any amounts related to this project. Now it appears that whatever monies have been invested may provide no benefit to Essex ratepayers. It is not clear to us with what has transpired that any monies should be recoverable from ratepayers. In any event, as has been said by SEC, there is no basis upon which to decide one way or another.

The regulatory process encompassing this pilot project also represents a burden to ratepayers. We are hesitant to suggest any more regulatory costs be expended on what appears now to be a defunct project. However, we do not see how the Board can make a reasoned decision in the absence of information on the status of this project, or if the parties in this proceeding cannot find a mutually acceptable agreement for its disposition. We suggest that whatever process considered that it be brief. In our view a one day meeting on the matter would suffice.

A handwritten signature in black ink, appearing to read 'M. Garner', is positioned above the printed name.

Mark Garner
Consultants for VECC/PIAC

Grace Flood, Director of Finance and Regulatory Affairs
gfflood@essespwrlines.ca

John A. D. Vellone, Counsel to Festival Hydro
jvellone@blg.com