

From: Office of the Registrar

Sent: Friday, May 8, 2026 3:12 PM

To: Spencer Patterson <Spencer.Patterson@oeb.ca>

Subject: Redacted - Letter of Comment Submitted: EB-2026-0129

LETTER OF COMMENT

Comments:

To the Ontario Energy Board, I am writing regarding Toronto Hydro-Electric System Limited's application for approval of its proposed Non-Wires Solutions Incentive Mechanism, file number EB-2026-0129. As an ordinary Toronto Hydro customer, I understand the value of non-wires solutions, including local demand response programs. If paying customers to reduce electricity demand at peak times can avoid or defer expensive grid upgrades, that may benefit all ratepayers through lower long-term costs, improved reliability, and more efficient use of the existing system. However, I have concerns about fairness and customer protection, particularly regarding the proposed 25% Margin-on-Payments incentive. My concern is that ordinary residential customers could end up paying for both the payments made to large program participants and an additional financial reward to Toronto Hydro, without clear proof that residential customers are better off overall. Many of the customers able to participate in these programs are likely to be larger commercial, institutional, or industrial users. While those customers may be able to provide valuable demand reductions, they may also be among the users contributing significantly to peak demand pressures in the first place. I do not object to non-wires solutions in principle. I object to approving an incentive unless the benefits to all customers, including residential customers, are clearly demonstrated and independently verified. I respectfully ask the OEB to ensure that: 1. Toronto Hydro proves that the total benefits of the program exceed the full costs, including participant payments, administrative costs, measurement and verification costs, and the proposed 25% margin. 2. Toronto Hydro only receives the margin if the program produces real, measurable, and verified demand reductions that avoid or defer necessary infrastructure costs. 3. Large participants are not

overcompensated for reductions they would have made anyway, or for reductions based on inflated baselines. 4. The costs and benefits are allocated fairly across customer classes, so ordinary residential customers are not unfairly subsidizing large electricity users or Toronto Hydro's incentive. 5. Toronto Hydro is required to provide transparent reporting on the amount paid to participants, the amount recorded as the margin incentive, the amount of demand actually reduced, the infrastructure costs avoided or deferred, and the net impact on residential customers. In my view, a non-wires solution can be fair if it saves all customers money compared with traditional infrastructure spending. But it would not be fair if ordinary customers are asked to fund payments to large users and a utility bonus without clear evidence of net savings. I ask the OEB to carefully scrutinize the proposed incentive and approve it only with strong safeguards, transparent reporting, and a clear requirement that ordinary customers are financially better off after all costs are included. Thank you.

Name: Graham Bull

Do you reside in the impacted service area?: Yes

Was AI used for the letter of comment?: Yes