

To: Registrar
Ontario Energy Board

Re: Toronto Hydro-Electric System Limited Application

File Number: EB-2026-0129

Subject: Letter of Comment / Request to Participate as an Intervenor

Dear Registrar,

I am writing as a concerned electricity customer and resident of Toronto to provide comments regarding the application filed by Toronto Hydro-Electric System Limited under File No. EB-2026-0129 concerning the proposed Non-Wires Solutions (NWS) Incentive Mechanism. Toronto Hydro is seeking approval for a 25% Margin-on-Payment's incentive rate and a deferral account related to its NWS Program from May 1, 2026 to December 31, 2029. ([Ontario Energy Board](#))

I respectfully request that the Ontario Energy Board consider the following concerns and recommendations:

1. Customer Affordability Must Remain the Priority

Electricity affordability remains a major concern for many households and small businesses in Toronto. Any new incentive mechanism that may eventually be recovered through future rates should be carefully scrutinized to ensure that customers are not paying excessive costs for programs whose benefits are uncertain.

2. Strong Evidence of Net Customer Benefit

Non-wires solutions can be innovative and beneficial when they reduce or defer expensive infrastructure upgrades. However, approval should only be granted if Toronto Hydro demonstrates through transparent cost-benefit analysis that this proposal will deliver measurable savings compared with traditional grid investments.

3. Performance-Based Accountability

If incentives are approved, they should be tied to actual results such as:

- Verified peak demand reduction
- Deferred capital spending
- Improved reliability outcomes
- Lower long-term customer costs

Customers should not bear costs unless measurable performance targets are achieved.

