



October 25, 2010

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Re: Toronto Hydro-Electric System Limited
Application for an Electricity Distribution Rate Change
AMPCO's Submission on the Draft Issues List
Board File No. EB-2010-0142

Dear Ms. Walli:

AMPCO has reviewed the Draft Issues List and makes the following comments:

Issue 1.4 Is the overall increase in the 2011 revenue requirement reasonable given the overall bill impact on consumers?

Toronto Hydro has requested that the wording be revised to "Is the overall increase in the 2011 distribution revenue requirement reasonable given its impact on the overall bill for consumers, and given the requirement to maintain the adequacy, reliability and quality of electricity service?"

AMPCO agrees with Toronto Hydro's suggested change to Issue 1.4 as the revised wording better reflects the Board's responsibilities under Section 1 (1) of the *OEB Act*. However, AMPCO recommends that the word "protect" replace the word "maintain" to be consistent with the *OEB Act*.

Issue 7.6 Are the proposed Total Loss Factors appropriate?

AMPCO notes that in the last hearing, the approved Issues List included the wording "Are the proposed Distribution Loss Factors appropriate? In the pre-filed evidence, values are given for the Supply Facilities Loss Factor, Distribution Loss Factors and Total Loss Factors.

AMPCO suggests that the issue wording be revised to "Are the proposed Loss Factors appropriate? to capture all of the loss factors included in the evidence.

Issue 8 Smart Meters

AMPCO agrees with Consumers Council of Canada (CCC) that the additional question posed by CCC should be added as Issue 8.2 - Are the proposed smart metering costs appropriate?

AMPCO has no additional comments on the Draft Issues List. Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

(ORIGINAL SIGNED BY)

Adam White
President
Association of Major Power Consumers in Ontario

Copy to: Toronto Hydro-Electric System Limited