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Delivered by Email

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Toronto Hydro-Electric System Limited EDR 2011
OEB File No. EB-2010-0142**

Toronto Hydro-Electric System Limited (“THESL”) responds to the submissions of intervenors with respect to the list of draft issues as follows:

Issue 1.4 AMPCO

THESL accepts the suggestion to replace “maintain” with “protect” in THESL’s revised issue 1.4.

Issue 4.3 VECC

The restatement of this issue proposed by VECC is acceptable to THESL.

Issue 7.2 (a) SSMWG

SSMWG suggests that the following new issue be added:

“Is it appropriate for Toronto Hydro to establish a separate rate class for multi-unit residential customers that are served directly by Toronto Hydro through its suite metering provision?”

SSMWG’s proposed new issue should not be accepted by the Board since this issue affects the broader distribution sector and not just THESL. This proposed issue is more appropriately addressed in a wider stakeholder consultation process; specifically, as part of the Board’s EB-2010-0219 Cost Allocation Review. Among other issues, the Cost Allocation Review will consider the relationship between the class revenue and the class total allocated costs and the Review should include the consideration of the issue proposed by SSMWG. If SSMWG’s proposed issue were included in THESL’s 2011 EDR proceeding in isolation from the Board’s broader stakeholder consultation Review, there is a risk that inconsistent outcomes would result as between THESL’s rate case and the Cost Allocation Review (as well as duplicating efforts and expenses). The Review is the appropriate forum to allow all interested utilities, consumers and other stakeholders to consider SSMWG’s proposed issue.

Accordingly, THESL submits that SSMWG's proposed issue be disallowed.

Issue 7.6 AMPCO

AMPCO proposes that issue 7.6 be revised to "Are the proposed Loss Factors appropriate?" THESL submits that this issue be amended to read: "Is the proposed Distribution Loss Factor appropriate?" to clarify that it is only the distribution loss factor which THESL can influence – other Loss Factors are beyond the control of THESL.

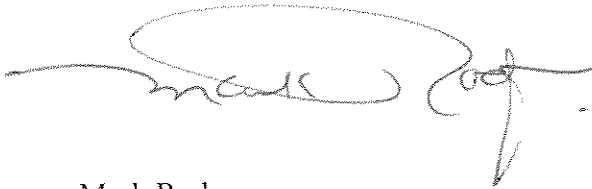
Issue 8 CCC

THESL accepts the suggestion to add issue 8.2 on smart meters which should read:

Are the proposed 2011 smart metering costs appropriate?

Yours very truly

BORDEN LADNER GERVAIS LLP



Mark Rodger

copy to:

Glen Winn, Toronto Hydro-Electric System Limited
All Parties

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