

November 9, 2009

BY E-MAIL

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Dear Mr. Rodger:

Re: Board File No. EB-2009-0180/ EB-2009-0181 / EB-2009-0182 and EB-2009-0183

Re: Applications by Toronto Hydro Energy Services Inc., Toronto Hydro-Electric

System Limited and 1798594 Ontario Inc.

Interrogatories of City of Toronto

On behalf of the City of Toronto, I enclose herewith Table entitled *Derivation of worst case 2010* street lighting distribution rates together with assumptions used in the Table and the explanation of the scenarios.

The City's consultant, Kathi Litt of Elenchus Research Associates, prepared this Table, assumptions and explanation, at my request.

I intend to refer to this Table in my questioning of Mr. J.S. Coulliard and Mr. P. Sardana at the hearing to commence on November 17, 2009 and did not want to surprise them with it there. I request that Mr. Coulliard and Mr. Sardana and their staffs review this Table in advance of their testimony so that they are familiar with it and can answer questions about it.

If in their review, they take the position that any of the assumptions or numbers are inaccurate or inappropriate or that any of the calculations are wrong, I request that you so advise me and provide me with any revisions prior to the hearing so that I am not taken by surprise either.

Many thanks!

Yours truly,

IAN BLUE

IAB/sh Enclosure

cc: Board Secretiary, Board Staff and Intervenors of record (by e-mail) Legal*4598946.1

EB-2009-0180/0181/0182/0183 Toronto Hydro-Electric System Limited Street Lighting Repatriation

Scenario		
 incremental	•	
 Revenue		
 Requirement	\$1,000,000	

	Scenario 1: 2008 rates in	Cenarin 1-7008 rates increased to achieve a BCC-1 and to OM&A for incremental Artivities	1 and to OMARA for I	Activities	Scenario 2: Proposed 2010 rates increased to recover incremental	O rates increased to re	cover incremental	Scenario 3: Proposed 20	Scenario 3: Proposed 2010 rate increased to achieve R:C=1 and to recover Incremental Arrivities	R:C=1 and to rec	over incremental
	Serious T. Food lates in	1000 0 00000000000000000000000000000000	OLONGO OLONGO			College					Withington
	****	Approved 2008	i en cirita	Adjusted Appropried	2010TY Proposed		Revieed 2010TV	2010TY Proposed	2010TY Proposed	_	Revised 2010TY
	Approved 2008	R:C=1	Recoveries	2008 Rates		Incremental Costs	Proposed Rates	Charge Parameters	Achieve R:C = 100% Incremental Costs		Proposed Rates
Fixed Rate Data Rate	0.66 (1)	1.65		1.76	1.12 (1)		1.21	1.12 (1)	1.60		1.69
Charge Parameter	162,046 (2)	162,046		***************************************	162,353 (2)			162,353 (2)	162,353		
Variable Rate Data Rate	\$15.3700 (1)	\$38.4250		\$40.9186	\$31.1169 (1)		\$33.6724	\$31.1169 (1)	\$44.4527		\$47.0083
Charge Parameter - kW Energy (kWh)	317,526 (3) 109,246,764 (3)	317,526 109,246,764			321,183 (3) 109,298,944 (3)			321,183 (3) 109,298,944 (3)	321,183 109,298,944		
Revenues	\$6,163,779	\$15,409,447		\$16,409,447	\$12,176,244	\$1,000,000	\$13,176,244	\$12,176,244	\$17,394,634		\$18,394,634
Costs	\$15,409,447	\$15,409,447	\$1,000,000	\$16,409,447	\$17,394,634	\$1,000,000	\$18,394,634	\$17,394,634	\$17,394,634	\$1,000,000	\$18,394,634
Revenue:Cost Ratio	40.00% (4)	100.00%		100.00%	70.00% (4)		71.63%	70.00% (4)	100.00%		100.00%
Revenue Verification Revenue per kWH	\$6,163,779 0.0564	\$15,409,447 0.1411		\$16,409,447 0.1502	\$12,176,244 0.1114		\$13,176,244 0.1206	\$12,176,244 0.1114	\$17,394,634 0.15 91		\$18,394,634 0.1683

Sources (1) EB-2009-0139/EXM1/T1/S1/p2 (2) EB-2009-0139/EXK1/T4/S1/p1 (3) EB-2009-0130/EXK1/T3/S2/p1 (4) EB-2009-0139/EXM1/T1/S1/p5

Toronto Hydro-Electric System Limited EB-2009-0180/0181/0182/0183 Street Lighting Repatriation

Data Inputs			
Tax Rate	32.00%	(1)	
Long Term Debt Rate	2.60%	(2)	
Long Term Debt Ratio	%95	(2)	
Short Term Debt Rate	1.33%	(2)	
Short Term Debt Ratio	4%	(2)	
Allowed Return on Equity	8.01%	(2)	
Equity Ratio	40%	(2)	
Depreciable Life	25 years	(3)	

Revenue Requirement	
Cost of Capital Depreciation Expense Deemed PILs - on Regulated Return	\$639,320 \$400,000 \$150,776
Incremental O&M	\$1,000,000
Total	\$2,190,096
OM&A to Support Incremental Activities	ctivities
OM&A	\$1,000,000

Scenario Ir NBV Incremental OM&A on assets OM&A to Support Incremental Activities

- **Sources** (1) EB-2009-0139/ExP1/T1/S2/p5 (2) EB-2009-0139/ExE1/T4/S1/p1
- (3) 2006 EDR Handbook Appendix B

THESL Street Light Repatriation retention

EB-2009-0180/0181/0182/0183

Rate Scenarios

Purpose

The attached spreadsheet has been prepared to quantify the impact to Street Lighting distribution rates of adjusting:

- The associated revenue:Cost ratio
- Recovering incremental revenues due to incremental activities or to the acquisition of incremental assets

Scenarios

Three different scenarios are projected.

Scenario 1 quantifies the changes to authorized 2008 Street Lighting distribution rates to:

- · achieve rates that recover all costs of providing service; and
- recover the costs of incremental activities.

Scenario 2 quantifies the changes to proposed 2010 Street Lighting distribution rates to achieve rates that recover the costs of incremental activities.

Scenario 3 quantifies the changes to proposed 2010 Street Lighting distribution rates to:

- achieve rates that recover all costs of providing service; and
- recover the costs of incremental activities.

Data

All data has been obtained from THESL's 2010EDR application; the specific exhibit references are indicated in the footnotes.

Methodology

Scenario 1

The revenues generated by 2008 rates and by 2008 rates that result in a Revenue:Cost ratio of 1.00 are computed. The allocated costs are increased by the costs of incremental activities and the revenues are set equal to the adjusted costs. The rates that result in a Revenue:Cost ratio of 1.00 are proportionally increasing by the ratio of:

- the sum of allocated costs plus costs of incremental activities; to
- allocated costs.

Scenario 2

The proposed 2010 Street Lighting distribution rates are relied on to estimate Street Lighting distribution revenues. The estimated revenues are divided by the target Revenue:Cost ratio to estimate the costs incurred to provide Street Lighting distribution service. The calculated revenues and estimated costs are both increased by costs of incremental activities. The adjusted revenues are divided by the adjusted costs to estimate the resulting Revenue:Cost ratio. The proposed Street Lighting distribution rates are proportionally increased by the ratio of:

- the sum of allocated costs plus costs of incremental activities; to
- allocated costs.

Scenario 3

The proposed 2010 Street Lighting distribution rates are relied on to estimate Street Lighting distribution revenues. The proposed Street Lighting distribution rates are divided by the Revenue:Cost ratio to estimate the rates that result in a Revenue:Cost ratio of 1.00. The allocated costs are increased by the costs of incremental activities and the associated revenues are forced to the same level. The Estimated Street Lighting distribution rates that recover all allocated costs are then increased by the ratio of:

- the sum of allocated costs plus costs of incremental activities; to
- allocated costs.

The revenues recovered under all estimated rates are calculated and divided by the energy consumed to estimate a levelized all in rate.