



October 14, 2011

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

Dear Ms. Walli:

Re: Toronto Hydro-Electric System Limited (THESL)
2012, 2013 & 2014 Electricity Distribution Rate Application
AMPCO Interrogatories – Preliminary Issue
Board File No. EB-2011-0144

Pursuant to Procedural Order No. 1 dated September 14, 2011, attached please find AMPCO interrogatories in the above proceeding.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

(ORIGINAL SIGNED BY)

Adam White

Copy to: THESL
Intervenors

Association of Major Power Consumers in Ontario

www.ampco.org

372 Bay Street, Suite 1702
Toronto, Ontario M5H 2W9

P. 416-260-0280
F. 416-260-0442

EB-2011-0144
Toronto Hydro-Electric System Limited (THESL)
2012, 2013 & 2014 Electricity Distribution Rate Application
Preliminary Issue – Early Rebasing
AMPCO Interrogatories

Interrogatory # 1

Reference: Exhibit A1, Tab 1, Schedule 2, Page 10

THESL's evidence states that there are some factors which lead the Board to consider that granting the Applicant two years of its cost of service application for 2008 and 2009 may be an effective regulatory approach, provided there are sufficient mid-term updates reflecting its performance relative to its forecast and productivity gains.

Please discuss the mid-term updates provided by THESL and include any relevant documents.

Interrogatory # 2

Reference: Exhibit D1, Tab 8, Schedule 1, Page 5, Table 1

Please reproduce Table 1: Summary of Capital Budget to include the original figures filed in the application for the years 2008 to 2011.

Interrogatory # 3

Reference: Exhibit A1, Tab 1, Schedule 2, Page 26, Table 3

- a) Please provide the number of Union + Non-Union management FTEs for 2008, 2009 and 2010.
- b) Please provide the most recent figure for 2011 of Union + Non-Union management FTEs.

Interrogatory # 4

Reference: Exhibit A1, Tab 1, Schedule 2, Page 30

On Page 30, the evidence states "All of this evidence pointed to the pressing need to invest substantially in THESL's aging, and in many cases failing distribution infrastructure. This investment is needed both to restore acceptable levels of service in areas experiencing unacceptably poor reliability, and to replace end of life equipment where the risk of failure is high."

Has THESL studied the factors causing failures and how age correlates? If so, please discuss.