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December 12, 2014

EMAIL & COURIER

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

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

Re: Toronto Hydro-Electric System Limited and Affiliates - Section 80 Notice of Proposal re Electricity Generation Facilities

We are counsel to Toronto Hydro-Electric System Limited ("THESL") and its affiliate, Toronto Hydro Energy Services Inc. ("THESI") (together "Toronto Hydro"). This letter provides notice to the Ontario Energy Board (the "OEB" or the "Board") that THESL has determined that certain generation facilities have been constructed, connected and placed into operation by THESL and certain of its affiliates, namely the City of Toronto (the "City") and its subsidiary the Toronto Community Housing Corporation ("TCHC"), and that minor interests in a generation facility have been acquired by THESI, without fulfilling the obligations on distributors and affiliates of distributors to give notice under Section 80 of the *Ontario Energy Board Act, 1998* (the "Act").

THESL deeply regrets this compliance error and, as described below, has taken a number of steps, including the preparation of this filing and the implementation of measures to prevent a recurrence in the future, in an effort to cure these regulatory shortcomings. This letter, together with the attached schedules, constitutes a notice of proposal under Section 80 of the Act for the construction of certain generation facilities that are owned, in whole or in part, by THESL or its affiliates, as well as for the acquisition of certain minor interests in a generation facility by THESI.

THESL's Response

In response to the above-referenced compliance error, THESL has undertaken the following steps:

First, in collaboration with its affiliates, THESL identified all interests in generation facilities that have been acquired and all generation facilities that have been constructed by THESL and each of its affiliates. THESL collected information about these facilities to enable consideration as to the potential applicability of Section 80 of the Act, and made efforts to determine whether Section 80 notices have previously been filed for these facilities.

Second, given the test applied by the Board in a Section 80 review, THESL assessed whether the construction of any of THESL's generation facilities, or those of its affiliates, or the acquisition of interests in generation facilities, could have had any potential adverse impacts on competition or the energy market in Ontario. It is THESL's submission that the construction of or acquisition of interests in the generation facilities that are described in this filing have not given rise to any potential adverse impacts, particularly because of the small size of these generation facilities, considered individually, and because the larger of these facilities are installed behind the meter.

Third, to ensure future compliance, THESL has established and implemented measures to verify that timely notices under Section 80 of the Act are filed in respect of any future generation facilities that may be developed or acquired by THESL or its affiliates. These measures are described below.

Finally, THESL has prepared this filing, which is intended to be curative in nature, to ensure the Board is fully apprised and informed and is aware that no facility constructed by THESL or its affiliates could have or has had any adverse impact on competition or the energy markets in Ontario.

Accordingly, by way of this letter, together with the attached schedules, we are hereby providing notice of proposal under Section 80 of the Act for the construction of certain generation facilities that are owned, in whole or in part, by THESL or its affiliates, as well as for the acquisition of minor interests in a generation facility by THESL.

No Review Warranted

On behalf of THESL, THESI, the City and TCHC, we submit that no Board review will be necessary and that, even if the requisite notices had been filed on a timely basis prior to construction or acquisition (as applicable), no Board review would have been necessary at that time. This is because none of the projects adversely affect the development or maintenance of a competitive market. Each facility, individually, is so small as to have no effect on the market. Moreover, the larger of the facilities that are the subject of this notice are installed behind the meter either for purposes of emergency power or for load displacement, such that no electricity is conveyed to the distribution system.

Mechanisms to Ensure Future Compliance

In anticipation of future generation facilities that may be developed by THESL or its affiliates, the following measures have been undertaken to ensure future compliance, on a timely basis, with the requirements under Section 80:

- THESL's Director of Generation and Capacity Planning has been designated as the person with primary responsibility for Section 80 compliance;
- THESL will develop and update, on a quarterly basis, a centralized listing of current and prospective generation projects by THESL and its affiliates and will communicate with relevant personnel in the City and its subsidiaries to confirm the accuracy of this listing;
- THESL will issue an internal communication to advise executives, directors and managers of the requirements of Section 80 as those requirements relate to THESL and its affiliates. This communication will be re-issued periodically;
- THESL will assist the City in preparing a communication to advise relevant personnel in City departments and subsidiaries regarding the requirements of Section 80 as those requirements relate to the City and its subsidiaries; and

- THESL will amend the application forms that it uses for pre-connection assessments and connection impact assessments so as to require applicants to indicate whether they are affiliated with THESL or the City. Internal guidelines relating to the pre-connection assessment and connection impact assessment processes will be updated and relevant staff will be trained accordingly.

Scope of the Notice

Notice is being filed in respect of 12 generation facilities that are owned in whole or in part by THESL, with minority interests in some of these facilities being held by the City, as well as one generation facility owned in part by THESI. There are 57 generation facilities that are wholly owned by the City, either directly or indirectly through subsidiaries that it controls. All of these facilities have been constructed and are in operation.

A list and description of the 12 THESL generation facilities and the one THESI facility is set out in **Schedule 'A'**, attached hereto. Notices of proposal in respect of these facilities were not filed prior to their construction, or in the case of THESI prior to it acquiring additional interests in the relevant generation facility. Nevertheless, THESL is filing this notice to demonstrate its commitment to bringing these facilities into compliance with the requirement under Section 80 of the Act.

Notice is also being filed in respect of 57 generation facilities that are wholly owned by the City, either directly or indirectly through subsidiaries that it controls, all of which have been constructed and are in operation. While the construction of these facilities triggers the requirement for notice under Section 80 of the Act, notices of proposal in respect of these facilities were not filed prior to their construction. A list of the relevant generation facilities, owned by the City and its subsidiaries, is set out in **Schedule 'B'**, attached hereto. As indicated in the letters attached hereto as **Schedule 'C'**, each of the City and TCHC have directed THESL to file this notice on their behalf to demonstrate their commitment to bringing these facilities into compliance with Section 80 of the Act and ensuring ongoing compliance in the future.

THESL Facilities

With respect to the 12 generation facilities that are owned in whole or in part by THESL, ten of these are small solar photovoltaic ("PV") facilities, with nameplate capacities ranging from 50 to 220 kW, that have been developed pursuant to the first iteration of the Ontario Power Authority's (the "OPA") Feed-in Tariff ("FIT") Program. Nine of these facilities were connected to the distribution system between January and March 2013 and one of the facilities was connected to the distribution system in June 2014. For each of these ten facilities, THESL holds a 51% interest with the remaining 49% being held by its co-owner, the City. The remaining two generation facilities, which are wholly owned by THESL, were installed behind-the-meter at THESL-operated buildings, one of which was connected in August 2004 and the other of which was connected in January 2006. No electricity is conveyed into the distribution system from these two generation facilities as one of these facilities is for emergency back-up power only and the other is used for load displacement. Nevertheless, as THESL is an electricity distributor, notice under Section 80 of the Act should have been filed by THESL, together with the City as co-owner as applicable, prior to commencing construction of each of these 12 generation facilities.

Enclosed at **Schedule 'D'** is a completed "Preliminary Filing Requirements for a Notice of Proposal Under Sections 80 and 81 of the *Ontario Energy Board Act, 1998*" form, which applies in respect of all 12 of the generation facilities owned in whole or in part by THESL.

THESI Facility

With respect to the one generation facility that is owned in part by THESI, this is a 750 kW single wind turbine situated at Exhibition Place that was connected to the distribution system in January 2003 and is the subject of electricity licence EG-2002-0440. A Section 80 Notice was filed on July 18, 2002 and amended on July 19, 2002 in proceeding no. EB-2002-0411 on the basis of THESI and its partner TREC Windpower Co-operative (No. 1) Inc. each having a 50% interest in the generation facility. The Board issued a Letter of No Review on September 27, 2002. On April 1, 2013, as a result of having made contributions to cover the full cost of certain improvements to the facility, THESI and its partner agreed to increase THESI's ownership interest in the generation facility from 50% to 55.1% and to decrease TREC's interest to 44.9%. As THESI is an affiliate of THESL, notice under Section 80 of the Act should have been filed by THESI prior to acquiring this additional interest.

Enclosed at **Schedule 'E'** is a completed "Preliminary Filing Requirements for a Notice of Proposal Under Sections 80 and 81 of the *Ontario Energy Board Act, 1998*" form, which form applies in respect of this one generation facility owned in part by THESI.

City of Toronto and TCHC Facilities

With respect to the 57 generation facilities that are wholly owned by the City, 19 of these facilities are owned directly by the City and 38 are owned by Toronto Community Housing Corporation ("TCHC"), a subsidiary that is wholly owned by the City. Of the 19 facilities owned directly by the City, 12 are administered directly by the City through its Environment and Energy Division, 5 of the facilities are administered through the City's governance structure at Exhibition Place, 1 facility is administered through the City's governance structure at the Toronto Parking Authority, and 1 facility is administered directly by the City through its water services department, known as Toronto Water.

Of the 38 TCHC generation facilities, 37 are small solar PV facilities with nameplate capacities ranging from 21 to 141 kW. These facilities were connected to THESL's distribution system between January 2010 and September 2014. The other TCHC generation facility is a gas engine facility rated 355 kW which was installed behind-the-meter in a residential building in 2010.

Regarding the 12 generation facilities owned by the City and administered through its Environment and Energy Division, all are small solar PV facilities with nameplate capacities ranging from 1 to 86 kW that have been developed under the OPA's FIT and microFIT Programs. These facilities were connected to THESL's distribution system between December 2010 and February 2014.

The 5 generation facilities owned by the City and administered through the governance structure at Exhibition Place include three solar PV facilities ranging in size from 100 to 150 kW, one of which was developed under the OPA's Renewable Energy Standard Offer Program ("RESOP") and connected in August 2007 and two of which were developed under the OPA's FIT Program and connected in September 2011 and April 2012. Exhibition Place also administers a 1.6 MW gas engine generation facility that was installed behind the meter in August 2007, and a 275 kW steam generation facility that was installed behind the meter in March 2014. No electricity is conveyed into the distribution system from these last two generation facilities as they are used for load displacement.

The generation facility owned by the City and administered through the Toronto Parking Authority is a 21 kW solar PV facility that was developed under the OPA's FIT Program and connected in June 2012. The generation facility owned by the City and administered by Toronto Water is a 4.7 MW biogas turbine facility that was installed behind the meter at a water treatment plant in March 2004. No electricity is conveyed into the distribution system from this generation facility as it is used for load displacement.

Enclosed at **Schedule 'F'** is a completed "Preliminary Filing Requirements for a Notice of Proposal Under Sections 80 and 81 of the *Ontario Energy Board Act, 1998*" form. This form has been used in respect of the 57 generation facilities owned by the City and TCHC.

Yours truly,

Jonathan Myers

cc: D. Coban, THESL
A. Klein, THESL
N. Sahni, THESL
C. Keizer, Torys LLP

Schedule 'A'

THESL and THESI Generation Facilities

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
1.	THESL (51%) City of Toronto (49%)	70 Birmingham Solar PV	70 Birmingham Street	220	Connected	Solar PV	FIT	March 5, 2013
2.	THESL (51%) City of Toronto (49%)	Roding Park Community Centre Solar PV	600 Roding Ave.	75	Connected	Solar PV	FIT	January 22, 2013
3.	THESL (51%) City of Toronto (49%)	Victoria Village Arena at Bermondsey Solar PV	190 Bermondsey Road	90	Connected	Solar PV	FIT	February 5, 2013
4.	THESL (51%) City of Toronto (49%)	Grandravine Park Community Centre Solar PV	23 Grandravine Dr.	100	Connected	Solar PV	FIT	January 25, 2013
5.	THESL (51%) City of Toronto (49%)	Agincourt Recreation Centre Arena Solar PV	31 Glen Watford Drive	50	Connected	Solar PV	FIT	February 5, 2013
6.	THESL (51%) City of Toronto (49%)	Goulding Park Community Centre Solar PV	45 Goulding Ave.	75	Connected	Solar PV	FIT	January 22, 2013
7.	THESL (51%) City of Toronto (49%)	Malvern C.R.C. Solar PV	30 Sewells Road	210	Connected	Solar PV	FIT	June 20, 2014

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
8.	THESL (51%) City of Toronto (49%)	McGregor Park Arena Solar PV	2231 Lawrence Ave. East	75	Connected	Solar PV	FIT	January 17, 2013
9.	THESL (51%) City of Toronto (49%)	Mimico Arena Solar PV	31 Drummond St.	50	Connected	Solar PV	FIT	January 16, 2013
10.	THESL (51%) City of Toronto (49%)	York Mills Arena Solar PV	2539 Bayview Ave.	75	Connected	Solar PV	FIT	January 17, 2013
11.	THESL (100%)	Toronto Hydro	500 Commissioners	36	Connected	Solar PV	Load Displacement	August 30, 2004
12.	THESL (100%)	Toronto Hydro	5800 Yonge St.	1000	Connected	Bio-Diesel	Emergency Power	January 7, 2006
13.	THESI (55.1%) TREC (44.9%)	Exhibition Place Wind Turbine	Exhibition Place	750	Connected	Wind	RESOP	January 4, 2003

Schedule 'B'

City of Toronto and TCHC Generation Facilities

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
1.	City of Toronto	F.J. Horgan PV System	201 Copperfield Rd	86.4	Connected	Solar PV	FIT	July 11, 2012
2.	City of Toronto	9 Hanna PV System	9 Hanna Ave	50	Connected	Solar PV	FIT	December 13, 2011
3.	City of Toronto	East York Civic Centre PV System	850 Coxwell Avenue	30	Connected	Solar PV	FIT	December 30, 2011
4.	City of Toronto	City of Toronto - 105 Colborne Lodge Drive	105 Colborne Lodge Drive	3	Connected	Solar PV	microFIT	January 21, 2014
5.	City of Toronto	City of Toronto - 25 Mendelssohn Street	25 Mendelssohn Street	9.75	Connected	Solar PV	microFIT	February 10, 2014
6.	City of Toronto	City of Toronto - 2700 Eglinton Avenue West	2700 Eglinton Avenue West	10	Connected	Solar PV	microFIT	February 20, 2014
7.	City of Toronto	City of Toronto - 760 Dovercourt Road	760 Dovercourt Road	4	Connected	Solar PV	microFIT	February 10, 2014
8.	City of Toronto	City of Toronto - 7 Edithvale Drive	7 Edithvale Drive	9.75	Connected	Solar PV	microFIT	February 12, 2014
9.	City of Toronto	City of Toronto - 339 Queens Quay West	339 Queens Quay West	3.2	Connected	Solar PV	microFIT	February 15, 2011
10.	City of Toronto	City of Toronto - 462 Runnymede Road	462 Runnymede Road	1.2	Connected	Solar PV	microFIT	December 23, 2010
11.	City of Toronto	City of Toronto - 56 Dawes Road - microFIT Solar PV	56 Dawes Road	3.44	Connected	Solar PV	microFIT	January 30, 2013

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
12.	City of Toronto	City of Toronto - 56 Neilson Drive - microFIT Solar PV	56 Neilson Drive	9.75	Connected	Solar PV	microFIT	February 19, 2014
13.	City of Toronto (Exhibition Place)	Coliseum East Annex Solar PV Project	100 Princes' Boulevard	150	Connected	Solar PV	FIT	April 24, 2012
14.	City of Toronto (Exhibition Place)	Horse Palace PV Project	15 Nova Scotia	100	Connected	Solar PV	FIT	September 21, 2011
15.	City of Toronto (Exhibition Place)	Exhibition Place (NTC) Trigen - National Trade Ctr Subst	100 Princes' Blvd (Synch)	1600	Connected	Gas Engine	Load Displacement	August 13, 2007
16.	City of Toronto (Exhibition Place)	Exhibition Place - Horse Palace - RESOP - Solar PV	140 Princes' Blvd	100	Connected	Solar PV	RESOP	August 13, 2007
17.	City of Toronto (Exhibition Place)	Exhibition Place - Steam Turbine	100 Princes' Blvd (Steam)	275	Connected	Steam	Load Displacement	March 25, 2014
18.	City of Toronto (Toronto Parking Authority)	Toronto Parking Authority - 2 Church Street	2 Church Street	21	Connected	Solar PV	FIT	June 18, 2012
19.	City of Toronto (Toronto Water)	Humber Treatment Plant	130 The Queensway	4700	Connected	Gas Turbine	Load Displacement	March 26, 2004
20.	TCHC	TCHC - 171 Front Street E - FIT Solar PV	171 Front Street E	73.255	Connected	Solar PV	FIT	September 23, 2011

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
21.	TCHC	TCHC - 176 Esplanade - FIT Solar PV	176 Esplanade	82.81	Connected	Solar PV	FIT	September 23, 2011
22.	TCHC	TCHC - 90 Parma Crt. - FIT Solar PV	90 Parma Crt.	50.60	Connected	Solar PV	FIT	November 1, 2011
23.	TCHC	TCHC - 1525 Dundas St. W. - FIT Solar PV	1525 Dundas St. W.	28.20	Connected	Solar PV	FIT	August 29, 2012
24.	TCHC	TCHC - 2 Faywood Blvd. - FIT Solar PV	2 Faywood Blvd.	21	Connected	Solar PV	FIT	November 1, 2011
25.	TCHC	TCHC - 1862 Sheppard Ave W - FIT Solar PV	1862 Sheppard Ave W	30.60	Connected	Solar PV	FIT	December 16, 2011
26.	TCHC	TCHC - 1884 Sheppard Ave W - FIT Solar PV	1884 Sheppard Ave W	30.60	Connected	Solar PV	FIT	December 16, 2011
27.	TCHC	TCHC - 1890 Sheppard Ave W - FIT Solar PV	1890 Sheppard Ave W	30.60	Connected	Solar PV	FIT	December 16, 2011
28.	TCHC	TCHC - 190 Woolner Ave. - FIT Solar PV	190 Woolner Ave.	18.80	Connected	Solar PV	FIT	December 28, 2011
29.	TCHC	TCHC - 100 Cavell Ave. - FIT Solar PV	100 Cavell Ave.	95.68	Connected	Solar PV	FIT	November 1, 2011
30.	TCHC	TCHC - 1898 Sheppard Ave W - FIT Solar PV	1898 Sheppard Ave W	30	Connected	Solar PV	FIT	December 16, 2011
31.	TCHC	TCHC - 1275 Danforth Ave. - FIT Solar PV	1275 Danforth Ave.	64.35	Connected	Solar PV	FIT	March 8, 2012

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
32.	TCHC	TCHC - 3680 Keele Street - Net Metering Solar PV	3680 Keele Street	107.64	Connected	Solar PV	Net Metering Solar PV	September 30, 2014
33.	TCHC	TCHC - 20 Eppleworth Rd - Net Metering Solar PV	20 Eppleworth Rd	50.60	Connected	Solar PV	Net Metering Solar PV	July 30, 2014
34.	TCHC	TCHC - 30 Eppleworth Rd - Net Metering Solar PV	30 Eppleworth Rd	50.60	Connected	Solar PV	Net Metering Solar PV	July 30, 2014
35.	TCHC	TCHC - 11 Arleta Ave - Net Metering Solar PV	11 Arleta Ave	68.77	Connected	Solar PV	Net Metering Solar PV	Septmeber 30, 2014
36.	TCHC	TCHC - 7 Arleta Ave - Net Metering Solar PV	7 Arleta Ave	82.80	Connected	Solar PV	Net Metering Solar PV	September 30, 2014
37.	TCHC	TCHC - 1400 Bathurst St - Net Metering Solar PV	1400 Bathurst St	63.25	Connected	Solar PV	Net Metering Solar PV	July 30, 2014
38.	TCHC	TCHC - 175 Cummer Ave - Net Metering Solar PV	175 Cummer Ave	140.53	Connected	Solar PV	Net Metering Solar PV	September 30, 2014
39.	TCHC	TCHC - 133 Broadway Ave - Net Metering Solar PV	133 Broadway Ave	33.12	Connected	Solar PV	Net Metering Solar PV	July 30, 2014
40.	TCHC	TCHC - 28 Broadway Ave - Net Metering Solar PV	28 Broadway Ave	43.24	Connected	Solar PV	Net Metering Solar PV	July 30, 2014

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
41.	TCHC	TCHC - 495 Wilson Ave - Net Metering Solar PV	495 Wilson Ave	65.78	Connected	Solar PV	Net Metering Solar PV	September 30, 2014
42.	TCHC	TCHC - 193 Wilson Ave - Net Metering Solar PV	193 Wilson Ave	57.40	Connected	Solar PV	FIT	July 30, 2014
43.	TCHC	TCHC - 931 Yonge St. - microFIT Solar PV	931 Yonge St.	5.95	Connected	Solar PV	microFIT	June 21, 2010
44.	TCHC	TCHC - 245 Dunn Ave. - microFIT Solar PV	245 Dunn Ave.	11.28	Connected	Solar PV	microFIT	February 13, 2012
45.	TCHC	TCHC - 415 Willowdale Ave, Block 1600 - microFIT Solar PV	415 Willowdale Ave, Block 1600	11.52	Connected	Solar PV	microFIT	March 22, 2012
46.	TCHC	TCHC - 30 Denarda St - microFIT Solar PV	30 Denarda St	10.92	Connected	Solar PV	microFIT	January 17, 2012
47.	TCHC	TCHC - 2765 Islington Ave - microFIT Solar PV	2765 Islington Ave	10.92	Connected	Solar PV	microFIT	February 9, 2012
48.	TCHC	TCHC - 155 Sherbourne St - microFIT Solar PV	155 Sherbourne St	10	Connected	Solar PV	microFIT	January 26, 2012
49.	TCHC	TCHC - 40 Firvalley Court - microFIT Solar PV	40 Firvalley Court	11.70	Connected	Solar PV	microFIT	January 4, 2012

	Owner	Project Name	Project Address	Capacity (kW)	Status	Technology	Program	Connection Date
50.	TCHC	TCHC - 33 Coatsworth Crescent - microFIT Solar PV	33 Coatsworth Crescent	2	Connected	Solar PV	microFIT	February 23, 2011
51.	TCHC	TCHC - 9 Balsam Ave - microFIT Solar PV	9 Balsam Ave	1	Connected	Solar PV	microFIT	November 19, 2010
52.	TCHC	TCHC - 42 Hubbard Blvd - microFIT Solar PV	42 Hubbard Blvd	5.40	Connected	Solar PV	microFIT	December 7, 2011
53.	TCHC	TCHC - 2765 Yonge St. - microFIT Solar PV	2765 Yonge St.	11.70	Connected	Solar PV	microFIT	March 22, 2012
54.	TCHC	TCHC – 15 Canlish 50 – 60 – microFIT Solar PV	50 Canlish 50 - 60	11.70	Connected	Solar PV	microFIT	March 2, 2013
55.	TCHC	TCHC – 2 Demarco Blvd – microFIT Solar PV	2 Demarco Blvd	11.70	Connected	Solar PV	microFIT	March 6, 2012
56.	TCHC	TCHC – 29 Louvain Ave – microFIT Solar PV	29 Louvain Ave	11.70	Connected	Solar PV	microFIT	April 26, 2012
57.	TCHC	Toronto Community Housing	341 Bloor St. W	355	Connected	Gas Engine	Load Displacement	January 19, 2010

Schedule 'C'

Letters of Direction from City of Toronto and TCHC to THESL



Chief Corporate Office Organization

Metro Hall
55 John Street
2nd Floor, Suite 204
Toronto, Ontario M5V 3C6

Josie Scioli
Chief Corporate Officer

Tel: 416-397-4156
Fax: 416-397-4828
jscioli@toronto.ca
www.toronto.ca

November 19, 2014

Toronto Hydro-Electric System Limited
14 Carlton Street
Toronto, ON
M5B 1K5

Attention: Daliana Coban, Regulatory Counsel

Dear Ms. Coban:

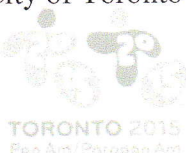
Re: Direction to File Section 80 Notice

On October 8, 2014, representatives of Toronto Hydro-Electric System Limited ("THESL") met with representatives of the City of Toronto to discuss THESL's determination that 19 electricity generation facilities that are wholly owned by the City, as well as 10 THESL electricity generation facilities in which the City has 49% interests, have been constructed, connected and placed into operation without the City fulfilling its obligation as an affiliate of an electricity distributor, namely THESL, to give notice in accordance with Section 80 of the *Ontario Energy Board Act*.

Further to these discussions, the City hereby directs THESL to file such notice on its behalf for the purpose of demonstrating the City's commitment to bringing these electricity generation facilities into compliance with the requirements of Section 80, and to use external legal counsel as may be needed for this purpose. The City also wishes to express its commitment to ensuring ongoing compliance with these requirements and to cooperating fully with the compliance protocols that THESL is putting into place. Moreover, in respect of generation facilities that are developed by the City or in which interests are acquired by the City, the City acknowledges that as an affiliate of a distributor the responsibility for compliance with Section 80 is that of the City and not of THESL.

Yours truly,


Josie Scioli
Chief Corporate Officer
City of Toronto



HOST CITY



November 18, 2014

Toronto Hydro-Electric System Limited
14 Carlton Street
Toronto, ON
M5B 1K5

Attention: Daliana Coban, Regulatory Counsel

Dear Ms. Coban:

Re: Direction to File Section 80 Notice

On October 8, 2014, representatives of Toronto Hydro-Electric System Limited ("THESL") met with representatives of Toronto Community Housing Corporation ("TCHC") to discuss THESL's determination that 38 electricity generation facilities owned by TCHC have been constructed, connected and placed into operation by TCHC without TCHC fulfilling its obligation as an affiliate of an electricity distributor, namely THESL, to give notice in accordance with Section 80 of the *Ontario Energy Board Act*.

Further to these discussions, TCHC hereby directs THESL to file such notice on its behalf for the purpose of demonstrating TCHC's commitment to bringing its 38 electricity generation facilities into compliance with the requirements of Section 80, and to use external legal counsel as may be needed for this purpose. TCHC also wishes to express its commitment to ensuring ongoing compliance with these requirements and to cooperating fully with the compliance protocols that THESL is putting into place. Moreover, in respect of generation facilities that are developed by TCHC or in which interests are acquired by TCHC, TCHC acknowledges that as an affiliate of a distributor the responsibility for compliance with Section 80 is that of TCHC and not of THESL.

Yours truly,



Ismail Ibrahim
Director of Compliance & Legal Counsel
Toronto Community Housing Corporation

Schedule 'D'

Completed Form of Section 80 Notice for THESL Facilities

Ontario Energy Board

Preliminary Filing Requirements For a Notice of Proposal under Sections 80 and 81 Of the *Ontario Energy Board Act, 1998*

PART 1: GENERAL MINIMUM FILING REQUIREMENTS

1.1 Identification of the Parties

1.1.1 Applicant

Name of Applicant Toronto Hydro-Electric System Limited ("THESL")	File No: (Board Use Only)
Address of Head Office 14 Carlton Street Toronto, Ontario M5B 1K5	Telephone Number 416.542.2627
	Facsimile Number 416.542.3024
	E-Mail Address dcoban@torontohydro.com
Name of Individual to Contact Ms. Daliana Coban Regulatory Counsel	Telephone Number 416.542.2627
	Facsimile Number 416.542.3024
	E-Mail Address dcoban@torontohydro.com

1.1.2 Other Parties to the Transaction or Project

Name of Other Party	Board Use Only
City of Toronto	
Address of Head Office	Telephone Number 416-338-720
Attention: City Manager CITY OF TORONTO City Hall 11th floor, East Tower 100 Queen Street West Toronto, Ontario M5H 2N2	Facsimile Number 416-396-5231
	E-Mail Address jlivey@toronto.ca
Name of Individual to Contact	Telephone Number 416-395-6927
Mr. Rob Maxwell Manager, Toronto Renewable Energy Office Environment and Energy Office City of Toronto	Facsimile Number 416-396-5231
	E-Mail Address rmaxwel@toronto.ca

1.2 Relationship between Parties to the Transaction or Project

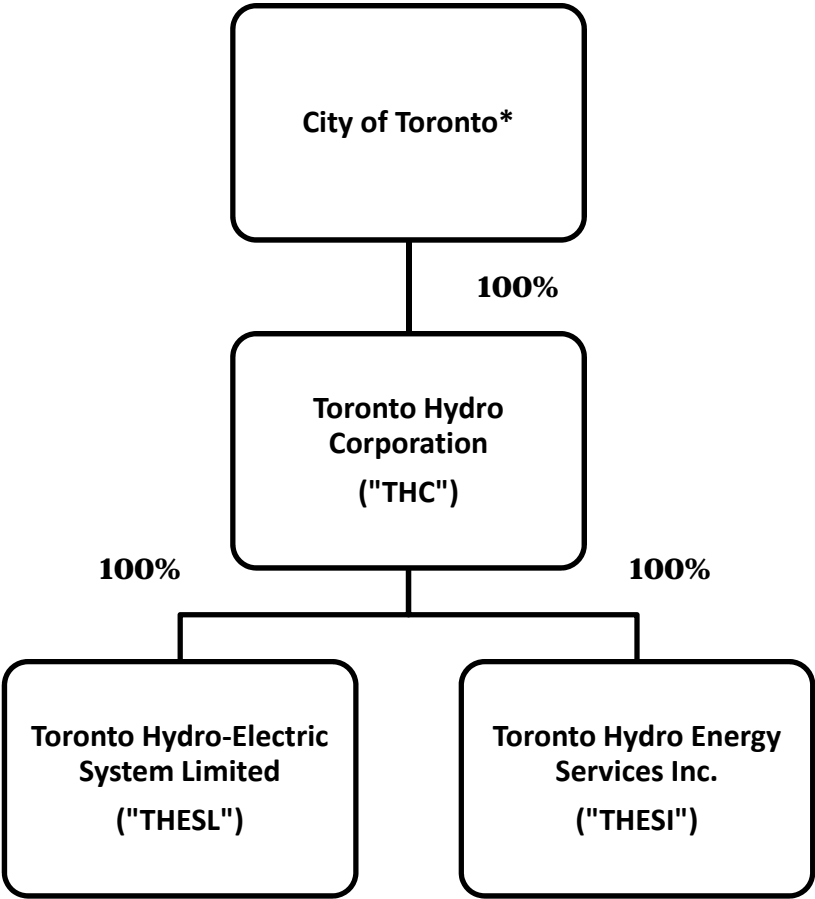
1.2.1	<i>Attach a list of the officers, directors and shareholders of each of the parties to the proposed transaction or project.</i>
	<p><u>THESL</u></p> <p>Officers:</p> <p>Anthony Haines - President and Chief Executive Officer Jean-Sebastien Couillard - Executive Vice-President and Chief Financial Officer Ivano Labricciosa - Executive Vice-President and Chief Business Development Officer Dino Priore - Executive Vice-President and Chief Engineering and Construction Officer Ben LaPianta - Executive Vice-President and Chief Electric Operations and Procurement Officer Robert Wong - Executive Vice-President and Chief Information and Risk Officer Chris Tyrrell - Executive Vice-President and Chief Customer Care and Conservation Officer Ave Lethbridge - Executive Vice-President and Chief Human Resources and Safety Officer Paul Sommerville - Executive Vice-President, Chief Regulatory Officer and General Counsel Conrad Sheppard - Corporate Secretary</p> <p>Directors:</p> <p>Colum Bastable Brian Chu</p> <p>Shareholder:</p>

Toronto Hydro Corporation

City of Toronto

Section 125(1) of the *City of Toronto Act, 2006* ("COTA") provides that the City of Toronto is continued as a body corporate composed of the inhabitants of its geographic area. The powers of the City are exercised by City Council and the Mayor of the City is the head of Council. Currently, the Mayor of Toronto is John Tory. The City of Toronto is the sole shareholder of the Toronto Hydro Corporation.

1.2.2 *Attach a corporate chart describing the relationship between each of the parties to the proposed transaction or project and each of their respective affiliates.*



*A chart showing the City of Toronto's Agencies and Corporations is available at:
<http://www1.toronto.ca/City%20Of%20Toronto/City%20Managers%20Office/Agencies%20and%20Corporations/Files/pdf/Agency%20Chart.pdf>

1.3 Description of the Businesses of Each of the Parties

1.3.1	<i>Attach a description of the business of each of the parties to the proposed transaction or project, including each of their affiliates licenced under the OEB Act to operate in Ontario for the generation, transmission, distribution, wholesaling or retailing of electricity or providing goods and services to companies licenced under the OEB Act in Ontario ("Electricity Sector Affiliates").</i>
	<p><u>THESL</u></p> <p>THESL owns and operates the electricity distribution system in the City of Toronto, which delivers electricity to approximately 730,000 customers. THESL is a licensed distributor pursuant to distribution licence ED-2002-0497. THESL is a wholly-owned subsidiary of Toronto Hydro Corporation.</p> <p><u>THESI</u></p> <p>THESI holds a 55.1% interest in, and operates, a 750 kW wind turbine generator located at Exhibition Place. The remaining 44.9% interest in the wind turbine generator is owned by TREC Windpower Co-operative (No. 1) Inc. ("TREC"), with whom THESI entered into a Joint Venture Agreement in 2002. THESI also provides street lighting system maintenance and capital improvement services to the City of Toronto. THESI is a wholly-owned subsidiary of Toronto Hydro Corporation.</p> <p><u>Toronto Hydro Corporation</u></p> <p>Toronto Hydro Corporation ("THC") is a holding company. The sole shareholder of THC is the City of Toronto. THC supervises the operations of, and provides corporate and management services and strategic direction to, its wholly-owned subsidiaries, THESL and THESI.</p> <p><u>City of Toronto</u></p> <p>The City of Toronto is Canada's largest city, the fourth largest in North America, and home to a population of approximately 2.8 million people.</p> <p>The City of Toronto is a municipal corporation continued under the <i>City of Toronto Act, 2006</i> ("COTA"). The City provides municipal government services to residents and businesses within its defined borders. Its authority, powers, duties and responsibilities are legislatively defined in COTA. Subject to certain exceptions, the City has the capacity, rights, powers and privileges of a natural person for the purpose of exercising its authority under COTA or any other act.</p> <p>Toronto's municipal government has 44 elected City Councillors who, along with the Mayor, make up Toronto's City Council. Decision making is undertaken through Council unless delegated to committees that are part of City Council, as well as through various agencies, boards, commissions and corporations that are controlled by the City.</p>

1.3.2	<p><i>Attach a description of the geographic territory served by each of the parties to the proposed transaction or project, including each of their Electricity Sector Affiliates, if applicable, and the geographic location of all existing generation facilities</i></p>
	<p><u>THESL</u></p> <p>THESL is licensed under ED-2002-0497 as the distribution company which is authorized to distribute and sell electricity in the City of Toronto. In addition to the 12 generation facilities owned by THESL which are the subject of this notice, the locations of which are listed in Schedule 'A' of the accompanying cover letter, THESL owns:</p> <ul style="list-style-type: none"> • a 250 kW solar PV rooftop facility at the Better Living Centre, located at 195 Princes' Blvd. in Exhibition Place, Toronto; and • a 250 kW solar PV rooftop facility at the THESL building located at 500 Commissioners Street, Toronto. <p><u>THESI</u></p> <p>THESI provides street lighting system maintenance and capital improvement services to the City of Toronto. As indicated in Schedule 'A' of the accompanying cover letter, THESI also holds a 55.1% ownership interest in a wind turbine located near the intersection of Alberta Circle and Yukon Place in Exhibition Place, Toronto.</p> <p><u>City of Toronto</u></p> <p>The City of Toronto is on the northwest shore of Lake Ontario and covers 641 square kilometers, stretching 43 km from east to west and 21 km from north to south at its longest points. The locations of its generation facilities are described in Schedules 'A' (co-owned facilities) and 'B' to the accompanying cover letter.</p>
1.3.3	<p><i>Attach a breakdown of the annual sales (in C\$, and in MWh) as of the most recent fiscal year end of the existing generation output among the IESO Administered Markets ("IAM), bilateral contracts, and local distribution companies.</i></p>
	<p>For the 2013 fiscal year, THESL's 250 kW rooftop solar project at the Better Living Center generated gross revenue of \$302,933, which corresponds to the gross electricity generation of 421 MWh.</p> <p>For the 2013 fiscal year, THESL's 250 kW rooftop solar project at the Toronto Hydro building at 500 Commissioners Street generated gross revenue of \$260,373, which corresponds to gross electricity generation of 365.2 MWh.</p>
1.3.4	<p><i>Attach a list identifying all relevant Board licences and approvals held by the parties to the proposed transaction or project and each of their Electricity Sector Affiliates, and any applications currently before the Board, or forthcoming. Please include all Board file numbers.</i></p>
	<p>THESL holds Electricity Distribution Licence ED-2002-0497 and currently has a 2015-2019 Custom Incentive Rate-Setting (CIR) Electricity Distribution Rate Application before the Board (EB-2014-0116).</p> <p>THESI holds Electricity Retailer Licence ER-2010-0050 and, together with TREC, its co-owner for the Exhibition Place wind turbine, holds Electricity Generator Licence EG-2002-0440.</p>

1.4 Current Competitive Characteristics of the Market

1.4.1	<p><i>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to the completion of the proposed transaction or project.</i></p>
	<p>THESL's generation capacity, without the 12 THESL-owned facilities that are the subject of its s. 80 notice, is 0.5 MW. The total capacity of the 12 THESL-owned facilities that are the subject of its s. 80 notice is 2.06 MW, of which THESL's proportionate share is 1.56 MW. THESL's total generation capacity is therefore 2.06 MW.</p> <p>THESI is an affiliate of THESL. THESI's generation capacity, without the 1 THESI-owned facility that is the subject of this application, is 0 MW. The total capacity of the 1 THESI-owned facility that is the subject of this application is 0.75 MW and, based on its 55.1% ownership interest, THESI's proportionate share of this capacity is 0.41 MW. TREC's proportionate share of the capacity from this facility is therefore 0.34 MW. Prior to THESI increasing its interest in this facility from 50% to 55.1%, each of THESI's and TREC's proportionate share of capacity was 0.375 MW.</p> <p>The City of Toronto is an affiliate of THESL, but is not an Electricity Sector Affiliate. The City of Toronto's generation capacity without the 19 facilities that are directly owned by the City or the 10 facilities in which the City is a co-owner with THESL, all of which are the subject of its s. 80 notice, is 0 MW. The total capacity of the 19 City-owned facilities that are the subject of its s. 80 notice is 7.17 MW. The total capacity of the 10 co-owned facilities is 1.02 MW, of which the City's proportionate share is 0.5 MW. The City of Toronto's total generation capacity is therefore 7.67 MW.</p> <p>TCHC is an affiliate of THESL, but is not an Electricity Sector Affiliate. TCHC's generation capacity, without the 38 TCHC-owned facilities that are the subject of its s. 80 notice, is 0 MW. The total capacity of the 38 TCHC-owned facilities that are the subject of its s. 80 notice is 1.80 MW. TCHC's total generation capacity is therefore 1.80 MW.</p> <p>Based on the foregoing, the total generation capacity of THESL and its affiliates without the facilities that are the subject of this s. 80 notice is 0.5 MW. The total generation capacity of the THESL and affiliate-owned facilities that are the subject of this notice is 11.44 MW. Therefore, the total generation capacity of THESL and its affiliates taking into account all facilities is 11.94 MW.</p>
1.4.2	<p><i>Describe the generation market share based on actual MWh production as a percent of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to completion of the proposed transaction or project.</i></p>
	<p>Annual Primary Demand in Ontario for 2013 was 140.7 TWh, or 140,700,000 MWh.</p> <p>THESL's two existing rooftop solar facilities, at the Better Living Center in Exhibition Place and at 500 Commissioners Street, generated a total of 786.2 MWh in 2013, which represents approximately 0.0005588% of the Annual Primary Demand.</p> <p>THESL has a 51% ownership interest in 10 of the facilities that are the subject of this notice and a 100% ownership interest in the remaining 2 facilities that are the subject of this notice. Collectively, these 12 facilities generated a total of 1,018.8 MWh in 2013. Based on its ownership interests in these facilities, THESL's proportionate share of the output of these facilities is 538.4 MWh, which represents approximately 0.00038% of the Annual Primary Demand.</p>

	<p>When THESL's existing generation of 786.2 MWh in 2013 is combined with its 538.4 MWh of generation from the facilities that are the subject of this notice, the total is 1,324.6 MWh, which represents approximately 0.00094% of the Annual Primary Demand.</p> <p>THESI has a 55.1% ownership interest in the existing wind turbine located at Exhibition Place, which generated a total of 747.3 MWh in 2013. Based on its ownership interest in the facility, THESI's proportionate share of the facility's output is 411.76 MWh, which represents approximately 0.00029% of the Annual Primary Demand.</p> <p>The City of Toronto has a 49% ownership interest in 10 of the facilities that are the subject of this notice. Collectively, these ten facilities generated 980.5 MWh in 2013. Based on its ownership interests in these facilities, the City of Toronto's proportionate share of the output of the facilities is 480.4 MWh, which represents approximately 0.00034% of the Annual Primary Demand.</p>
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1.5 Description of the Proposed Transaction or Project and Impact on Competition – General

1.5.1	<i>Attach a detailed description of the proposed transaction or project, including geographic locations of proposed new transmission or distribution systems, or new generation facilities.</i>
	Descriptions of the THESL generation facilities, including their locations, are provided in Schedule 'A' to the accompanying letter.
1.5.2	<i>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</i>
	See response to 1.4.1, above.
1.5.3	<i>Describe the generation market share based on anticipated MWh production as a percentage of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</i>
	See response to 1.4.2, above.
1.5.4	<i>Attach a short description of the impact, if any, of the proposed transaction or project on competition. If there will be no impact on competition, please state the reasons. Cite specifically the impacts of the proposal on customer choice regarding generation, energy wholesalers, and energy retailers.</i>

	<p>The generation facilities that are the subject of this notice do not now and have not ever had an impact on competition. If notices under Section 80 of the Act had been filed prior to the commencement of construction for each of these facilities individually, in accordance with the requirements of that provision, no impacts on competition would have been found. The generation capacity of each facility, whether considered individually or in aggregate, represents a very small fraction of the overall supply capacity in Ontario and the annual electricity actually supplied from these facilities represents a very small fraction of the annual energy demand in Ontario. In addition, some of these facilities are located behind the meter where their potential impacts on the market are even more remote. Accordingly, these facilities do not and have not affected customer choice regarding generation, energy wholesalers or energy retailers.</p>
1.5.5	<p><i>Provide confirmation that the proposed transaction or project will have no impact on open access to the transmission or distribution system of the parties of their affiliates. If open access will be affected explain how and why.</i></p>
	<p>Confirmed. The generation facilities have not and will not have any impact on open access to THESL's distribution system. THESL has applied its standard interconnection processes and requirements in respect of each of the generation facilities, whether developed by THESL or a THESL affiliate. These processes and requirements have been applied without regard to who the project proponent is and no priority access has been given to any THESL or THESL-affiliated facilities.</p>

1.6 Other Information

1.6.1	<p><i>Attach confirmation that the parties to the proposed transaction or project are in compliance with all licence and code requirements, and will continue to be in compliance after completion of the proposed transaction or project.</i></p>
	<p>With the exception of the compliance issue with s. 80 of the Act that has been acknowledged and which is being addressed through the filing of this notice, it is THESL's understanding that it is in compliance with all licence and Code requirements, and that it will continue to be in compliance.</p>

PART II: SECTION 80 OF THE ACT-TRANSMITTERS AND DISTRIBUTORS ACQUIRING AN INTEREST IN GENERATORS OR CONSTRUCTING A GENERATION FACILITY

2.1 Effect on Competition

2.1.2	<i>Describe whether the proposed generation output will be primarily offered into the IAM, sold via bilateral contracts, or for own use.</i>
	The generation output from 10 of the THESL co-owned generation facilities is and will continue to be offered into the IAM pursuant to FIT and microFIT contracts with the OPA and supplied into THESL's distribution system. The generation output from the remaining two THESL-owned generation facilities is for emergency back-up or load displacement purposes at THESL's operations buildings.
2.1.3	<i>Provide a description of the generation including fuel source, technology used, maximum capacity output, typical number of hours of operation in a year, and peaking versus base-load character.</i>
	See Schedule 'A' to the accompanying letter.
2.1.4	<i>Provide details on whether the generation facility is expected to sign a "must run" contract with the IESO.</i>
	The generation facilities are not expected to sign "must run" contracts with the IESO.
2.1.5	<i>Provide details of whether the generation facility is expected to serve a "load pocket", or is likely to be "constrained on" due to transmission constraints.</i>
	The generation facilities will not serve any "load pockets" and they are not likely to be "constrained on" due to transmission constraints.

2.2 System Reliability

Section 2.2 must be completed by applicants who are claiming that the proposed transaction or project is required for system reliability under section 82(2)(b) of the Act.

This section is not applicable.

2.2.1	Provide reasons why the proposal is required to maintain the reliability of the transmission or distribution system. Provide supporting studies.
2.2.2	Discuss the effect of the proposal on the adequacy (ability of supply to meet demand) of supply in the relevant control area or distribution region, citing effects on capacity plus reserve levels in comparison to load forecasts.
2.2.3	Discuss the effect of the proposal on the security (ability of supply to respond to system contingencies) of supply.
2.2.4	Provide a copy of the IESO Preliminary System Impact Assessment Report, if completed, and the IESO Final System Impact Assessment Report, if completed. If the IESO is not conducting a System Impact Assessment Report, please explain.

PART III: SECTION 81 OF THE ACT-GENERATORS ACQUIRING AN INTEREST IN OR CONSTRUCTING A TRANSMISSION OR DISTRIBUTION SYSTEM

This section is not applicable.

3.1.1	Provide a description of the transmission or distribution system being acquired or constructed.	
3.1.2	Provide details on whether the generation facilities owned by the acquiring company are or will be directly connected to the transmission or distribution system being acquired or constructed.	
3.1.3	Provide details of whether the generation facility is expected to serve a “load pocket”, or is likely to be “constrained on” due to transmission constraints.	
3.1.4	Provide details on whether the generation facilities are expected to sign a “must run” contract with the IESO.	

How to Contact the Ontario Energy Board

The Ontario Energy Board is located at:
P.O. Box 2319
2300 Yonge Street, Suite 2701
Toronto, Ontario
M4P 1E4

Telephone:	416-481-1967
Toll Free Number:	1-888-632-6273
Fax:	416-440-7656
Website:	http://www.oeb.gov.on.ca
Board Secretary's e-mail address:	boardsec@otb.gov.on.ca

Schedule 'E'

Completed Form of Section 80 Notice for THESI Facilities

Ontario Energy Board
Preliminary Filing Requirements
For a Notice of Proposal under Sections 80 and 81
Of the *Ontario Energy Board Act, 1998*

PART 1: GENERAL MINIMUM FILING REQUIREMENTS

1.1 Identification of the Parties

1.1.1 Applicant

Name of Applicant Toronto Hydro Energy Services Inc. ("THESI")	Board Use Only
Address of Head Office 14 Carlton Street Toronto, Ontario M5B 1K5	Telephone Number 416.542.2627
	Facsimile Number 416.542.3024
	E-Mail Address dcoban@torontohydro.com
Name of Individual to Contact Ms. Daliana Coban Regulatory Counsel	Telephone Number 416.542.2627
	Facsimile Number 416.542.3024
	E-Mail Address dcoban@torontohydro.com

1.1.2 Other Parties to the Transaction or Project

Name of Other Party TREC Windpower Co-operative (No. 1) Inc. ("TREC")	Board Use Only
Address of Head Office 401 Richmond Street West, Suite 240 Toronto, Ontario M5V 3A8	Telephone Number 416-977-5093
	Facsimile Number 416-306-6476

	E-Mail Address info@trec.on.ca
Name of Individual to Contact	Telephone Number 416-977-5093
James Law TREC Services Manager 401 Richmond Street West, Suite 240 Toronto, Ontario M5V 3A8	Facsimile Number 416-306-6476
	E-Mail Address james@trec.on.ca

1.2 Relationship between Parties to the Transaction or Project

1.2.1	<i>Attach a list of the officers, directors and shareholders of each of the parties to the proposed transaction or project.</i>
	<p><u>THESI</u></p> <p>Officers:</p> <p>Anthony Haines - President and Chief Executive Officer Jean-Sebastien Couillard - Executive Vice-President and Chief Financial Officer Paul Sommerville - Executive Vice-President, Chief Regulatory Officer and General Counsel Conrad Sheppard - Corporate Secretary</p> <p>Director:</p> <p>Isabel Meharry</p> <p>Shareholder:</p> <p>Toronto Hydro Corporation</p> <p><u>TREC</u></p> <p>Officers:</p> <p>Dianne Saxe, President Dave Bedard, Treasurer Chongye So, Secretary</p> <p>Directors:</p> <p>Dianne Saxe Ted Tracewicz Gary Zavitz Dave Bedard Chongye So</p>

	<p>Bob Leigh Ted Tracewicz</p> <p>Shareholders:</p> <p>All members of the co-operative have the right to vote on all major decisions for the co-op.</p>
1.2.2	<p><i>Attach a corporate chart describing the relationship between each of the parties to the proposed transaction or project and each of their respective affiliates.</i></p>
	<div><pre>graph TD; A[City of Toronto] -- 100% --> B[Toronto Hydro Corporation]; B -- 100% --> C[Toronto Hydro-Electric System Limited]; B -- 100% --> D[Toronto Hydro Energy Services Inc.]</pre></div> <p>As described below, THESI entered into a Joint Venture Agreement in 2002 with TREC in respect of the wind turbine generator they co-own at Exhibition Place. THESI recently increased its ownership interest under the terms of the Joint Venture Agreement.</p>

1.3 Description of the Businesses of Each of the Parties

1.3.1	<p><i>Attach a description of the business of each of the parties to the proposed transaction or project, including each of their affiliates licenced under the OEB Act to operate in Ontario for the generation, transmission, distribution, wholesaling or retailing of electricity or providing goods and services to companies licenced under the OEB Act in Ontario ("Electricity Sector Affiliates").</i></p>
	<p><u>THESI</u></p> <p>THESI is a wholly-owned subsidiary of Toronto Hydro Corporation ("THC") and is thereby an affiliate of Toronto Hydro-Electric System Limited ("THESL"). THESI holds a 55.1% interest in a 750 kW wind turbine generator located at Exhibition Place. The turbine was connected to THESL's distribution system in January 2003 and is the subject of electricity licence EG-2002-0440. The remaining 44.9% interest in the wind turbine generator is owned by TREC. THESI and TREC entered into a Joint Venture Agreement in February 2002 for the purposes of acquiring, owning and operating the wind turbine project. THESI also provides street lighting system maintenance and capital improvement services to the City of Toronto.</p> <p><u>THC</u></p> <p>THC is a holding company and is a wholly-owned subsidiary of the City of Toronto. THC supervises the operations of, and provides corporate and management services and strategic direction to, its wholly-owned subsidiaries, THESL and THESI.</p> <p><u>THESL</u></p> <p>THESL owns and operates the electricity distribution system in the City of Toronto, which delivers electricity to approximately 730,000 customers. THESL is a licensed distributor pursuant to distribution licence ED-2002-0497. THESL is a wholly-owned subsidiary of Toronto Hydro Corporation.</p> <p><u>TREC</u></p> <p>TREC is a co-operative company that entered into a Joint Venture Agreement with THESI in February 2002 for the purposes of acquiring, owning and operating a 750 kW wind turbine generator located at Exhibition Place. The turbine was connected to THESL's distribution system in January 2003 and is the subject of electricity licence EG-2002-0440.</p>
1.3.2	<p><i>Attach a description of the geographic territory served by each of the parties to the proposed transaction or project, including each of their Electricity Sector Affiliates, if applicable, and the geographic location of all existing generation facilities</i></p>
	<p><u>THESI</u></p> <p>THESI provides street lighting system maintenance and capital improvement services to the City of Toronto. THESI also holds a 55.1% ownership interest in a wind turbine located near the intersection of Alberta Circle and Yukon Place in Exhibition Place, Toronto.</p>

	<p><u>THESL</u></p> <p>THESL is licensed under ED-2002-0497 as the distribution company which is authorized to distribute and sell electricity in the City of Toronto. In addition to the 12 generation facilities owned by THESL which are the subject of this notice, as listed in Schedule 'A' of the accompanying cover letter, THESL owns the following facilities for which s. 80 notices have previously been filed:</p> <ul style="list-style-type: none"> • a 250 kW solar PV rooftop facility at the Better Living Centre, located at 195 Princes' Blvd. in Exhibition Place, Toronto; and • a 250 kW solar PV rooftop facility at the THESL building located at 500 Commissioners Street, Toronto. <p><u>City of Toronto</u></p> <p>The City of Toronto is on the northwest shore of Lake Ontario and covers 641 square kilometers, stretching 43 km from east to west and 21 km from north to south at its longest points. The locations of its generation facilities are described in Schedules 'A' (co-owned facilities) and 'B' to the accompanying cover letter.</p> <p><u>TREC</u></p> <p>TREC holds a 44.9% ownership interest in a wind turbine located near the intersection of Alberta Circle and Yukon Place in Exhibition Place, Toronto. The remaining 55.1% interest is owned by THESI.</p>
1.3.3	<p><i>Attach a breakdown of the annual sales (in C\$, and in MWh) as of the most recent fiscal year end of the existing generation output among the IESO Administered Markets ("IAM), bilateral contracts, and local distribution companies.</i></p>
	<p>For the 2013 fiscal year, the Exhibition Place wind turbine generated gross revenue of \$90,296, which corresponds to gross electricity generation of 743.3 MWh. Based on its 55.1% interest in this facility, THESI's proportionate share of this revenue was \$49,753 and its proportionate share of generation was 409.6 MWh.</p>
1.3.4	<p><i>Attach a list identifying all relevant Board licences and approvals held by the parties to the proposed transaction or project and each of their Electricity Sector Affiliates, and any applications currently before the Board, or forthcoming. Please include all Board file numbers.</i></p>
	<p>THESI holds Electricity Retailer Licence ER-2010-0050 and, together with TREC, its co-owner for the Exhibition Place wind turbine, holds Electricity Generator Licence EG-2002-0440.</p> <p>THESL holds Electricity Distribution Licence ED-2002-0497 and currently has a 2015-2019 Custom Incentive Rate-Setting (CIR) Electricity Distribution Rate Application before the Board (EB-2014-0116).</p>

1.4 Current Competitive Characteristics of the Market

1.4.1	<p><i>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to the completion of the proposed transaction or project.</i></p>
	<p>THESL's generation capacity, without the 12 THESL-owned facilities that are the subject of its s. 80 notice, is 0.5 MW. The total capacity of the 12 THESL-owned facilities that are the subject of its s. 80 notice is 2.06 MW, of which THESL's proportionate share is 1.56 MW. THESL's total generation capacity is therefore 2.06 MW.</p> <p>THESI is an affiliate of THESL. THESI's generation capacity, without the 1 THESI-owned facility that is the subject of this application, is 0 MW. The total capacity of the 1 THESI-owned facility that is the subject of this application is 0.75 MW and, based on its 55.1% ownership interest, THESI's proportionate share of this capacity is 0.41 MW. TREC's proportionate share of the capacity from this facility is therefore 0.34 MW. Prior to THESI increasing its interest in this facility from 50% to 55.1%, each of THESI's and TREC's proportionate share of capacity was 0.375 MW.</p> <p>The City of Toronto is an affiliate of THESL, but is not an Electricity Sector Affiliate. The City of Toronto's generation capacity without the 19 facilities that are directly owned by the City or the 10 facilities in which the City is a co-owner with THESL, all of which are the subject of its s. 80 notice, is 0 MW. The total capacity of the 19 City-owned facilities that are the subject of its notice is 7.17 MW. The total capacity of the 10 co-owned facilities is 1.02 MW, of which the City's proportionate share is 0.5 MW. The City of Toronto's total generation capacity is therefore 7.67 MW.</p> <p>TCHC is an affiliate of THESL, but is not an Electricity Sector Affiliate. TCHC's generation capacity, without the 38 TCHC-owned facilities that are the subject of its s. 80 notice, is 0 MW. The total capacity of the 38 TCHC-owned facilities that are the subject of its s. 80 notice is 1.80 MW. TCHC's total generation capacity is therefore 1.80 MW.</p> <p>Based on the foregoing, the total generation capacity of THESL and its affiliates without the facilities that are the subject of this notice is 0.5 MW. The total generation capacity of the THESL and affiliate-owned facilities that are the subject of this notice is 11.44 MW. Therefore, the total generation capacity of THESL and its affiliates taking into account all facilities is 11.94 MW.</p>
1.4.2	<p><i>Describe the generation market share based on actual MWh production as a percent of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to completion of the proposed transaction or project.</i></p>

	<p>Annual Primary Demand in Ontario for 2013 was 140.7 TWh, or 140,700,000 MWh.</p> <p>THESL's two existing rooftop solar facilities, at the Better Living Center in Exhibition Place and at 500 Commissioners Street, generated a total of 786.2 MWh in 2013, which represents approximately 0.0005588% of the Annual Primary Demand.</p> <p>THESL has a 51% ownership interest in 10 of the facilities that are the subject of this notice and a 100% ownership interest in the remaining 2 facilities that are the subject of this notice. Collectively, these 12 facilities generated a total of 1,018.8 MWh in 2013. Based on its ownership interests in these facilities, THESL's proportionate share of the output of these facilities is 538.4 MWh, which represents approximately 0.00038% of the Annual Primary Demand.</p> <p>When THESL's existing generation of 786.2 MWh in 2013 is combined with its 538.4 MWh of generation from the facilities that are the subject of this notice, the total is 1,324.6 MWh, which represents approximately 0.00094% of the Annual Primary Demand.</p> <p>THESI has a 55.1% ownership interest in the existing wind turbine located at Exhibition Place, which generated a total of 747.3 MWh in 2013. Based on its ownership interest in the facility, THESI's proportionate share of the facility's output is 411.76 MWh, which represents approximately 0.00029% of the Annual Primary Demand.</p> <p>The City of Toronto has a 49% ownership interest in 10 of the facilities that are the subject of this notice. Collectively, these ten facilities generated 980.5 MWh in 2013. Based on its ownership interests in these facilities, the City of Toronto's proportionate share of the output of the facilities is 480.4 MWh, which represents approximately 0.00034% of the Annual Primary Demand.</p>
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1.5 Description of the Proposed Transaction or Project and Impact on Competition – General

1.5.1	<i>Attach a detailed description of the proposed transaction or project, including geographic locations of proposed new transmission or distribution systems, or new generation facilities.</i>
	A description of THESI's acquisition of minor additional interests in the Exhibition Place wind turbine generation facility is provided in the accompanying cover letter and additional details about the facility are provided in Schedule 'A' thereto.
1.5.2	<i>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</i>
	See response to 1.4.1, above.
1.5.3	<i>Describe the generation market share based on anticipated MWh production as a percentage of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</i>

	See response to 1.4.2, above.
1.5.4	<i>Attach a short description of the impact, if any, of the proposed transaction or project on competition. If there will be no impact on competition, please state the reasons. Cite specifically the impacts of the proposal on customer choice regarding generation, energy wholesalers, and energy retailers.</i>
	THESI's acquisition of minor additional interests in the generation facility it co-owns with TREC does not now and has not previously had an impact on competition. If notice under Section 80 of the Act had been filed prior to the additional interests being acquired, no impacts on competition would have been found. The generation capacity of the facility, and the incremental change in THESI's ownership interest in the facility, represents a very small fraction of the overall supply capacity in Ontario and the annual electricity actually supplied from this facility represents a very small fraction of the annual energy demand in Ontario. Accordingly, THESI's acquisition of a further 5.1% ownership interest in the facility does not and has not previously affected customer choice regarding generation, energy wholesalers or energy retailers.
1.5.5	<i>Provide confirmation that the proposed transaction or project will have no impact on open access to the transmission or distribution system of the parties of their affiliates. If open access will be affected explain how and why.</i>
	Confirmed. The acquisition of minor additional interests in the generation facility has not and will not have any impact on open access to THESL's distribution system.

1.6 Other Information

1.6.1	<i>Attach confirmation that the parties to the proposed transaction or project are in compliance with all licence and code requirements, and will continue to be in compliance after completion of the proposed transaction or project.</i>
	With the exception of the compliance issue with Section 80 of the Act that has been acknowledged and which is being addressed through the filing of this notice, it is THESL's understanding that it is in compliance with all licence and Code requirements, and that it will continue to be in compliance.

PART II: SECTION 80 OF THE ACT-TRANSMITTERS AND DISTRIBUTORS ACQUIRING AN INTEREST IN GENERATORS OR CONSTRUCTING A GENERATION FACILITY

2.1 Effect on Competition

2.1.2	<i>Describe whether the proposed generation output will be primarily offered into the IAM, sold via bilateral contracts, or for own use.</i>
	The generation output from THESI's co-owned wind turbine is used primarily for load displacement.
2.1.3	<i>Provide a description of the generation including fuel source, technology used, maximum capacity output, typical number of hours of operation in a year, and peaking versus base-load character.</i>
	See Schedule 'A' to the accompanying letter.
2.1.4	<i>Provide details on whether the generation facility is expected to sign a "must run" contract with the IESO.</i>
	The generation facility is not expected to sign a "must run" contract with the IESO.
2.1.5	<i>Provide details of whether the generation facility is expected to serve a "load pocket", or is likely to be "constrained on" due to transmission constraints.</i>
	The generation facility will not serve any "load pockets" and is not likely to be "constrained on" due to transmission constraints.

2.2 System Reliability

Section 2.2 must be completed by applicants who are claiming that the proposed transaction or project is required for system reliability under section 82(2)(b) of the Act.

This section is not applicable.

2.2.1	Provide reasons why the proposal is required to maintain the reliability of the transmission or distribution system. Provide supporting studies.
2.2.2	Discuss the effect of the proposal on the adequacy (ability of supply to meet demand) of supply in the relevant control area or distribution region, citing effects on capacity plus reserve levels in comparison to load forecasts.
2.2.3	Discuss the effect of the proposal on the security (ability of supply to respond to system contingencies) of supply.
2.2.4	Provide a copy of the IESO Preliminary System Impact Assessment Report, if completed, and the IESO Final System Impact Assessment Report, if completed. If the IESO is not conducting a System Impact Assessment Report, please explain.

**PART III: SECTION 81 OF THE ACT-GENERATORS ACQUIRING AN INTEREST IN OR CONSTRUCTING A
TRANSMISSION OR DISTRIBUTION SYSTEM**

This section is not applicable.

3.1.1	Provide a description of the transmission or distribution system being acquired or constructed.
3.1.2	Provide details on whether the generation facilities owned by the acquiring company are or will be directly connected to the transmission or distribution system being acquired or constructed.
3.1.3	Provide details of whether the generation facility is expected to serve a “load pocket”, or is likely to be “constrained on” due to transmission constraints.
3.1.4	Provide details on whether the generation facilities are expected to sign a “must run” contract with the IESO.

How to Contact the Ontario Energy Board

The Ontario Energy Board is located at:
P.O. Box 2319
2300 Yonge Street, Suite 2701
Toronto, Ontario
M4P 1E4

Telephone:	416-481-1967
Toll Free Number:	1-888-632-6273
Fax:	416-440-7656
Website:	http://www.oeb.gov.on.ca
Board Secretary's e-mail address:	boardsec@otb.gov.on.ca

Schedule 'F'

Completed Form of Section 80 Notice for City of Toronto and TCHC Facilities

Ontario Energy Board

Preliminary Filing Requirements For a Notice of Proposal under Sections 80 and 81 Of the *Ontario Energy Board Act, 1998*

PART 1: GENERAL MINIMUM FILING REQUIREMENTS

1.1 Identification of the Parties

1.1.1 Applicant

Name of Applicant	Board Use Only
City of Toronto	
Address of Head Office	Telephone Number 416-338-720
Attention: City Manager CITY OF TORONTO City Hall 11th floor, East Tower 100 Queen Street West Toronto, Ontario M5H 2N2	Facsimile Number 416-396-5231
	E-Mail Address ilivey@toronto.ca
Name of Individual to Contact	Telephone Number 416-395-6927
Mr. Rob Maxwell Manager, Toronto Renewable Energy Office Environment and Energy Office City of Toronto	Facsimile Number 416-396-5231
	E-Mail Address rmaxwel@toronto.ca

Name of Other Party	Board Use Only
Toronto Community Housing Corporation ("TCHC")	
Address of Head Office	Telephone Number 416-981-5500
931 Yonge St. Toronto, ON M4W 2H2	Facsimile Number 416-981-4224
	E-Mail Address info@torontohousing.ca
Name of Individual to Contact	Telephone Number 416-981-4241
Mr. Ismail Ibrahim	

Director, Compliance & Legal Counsel Toronto Community Housing Corporation	Facsimile Number 416-981-4234
	E-Mail Address Ismail.ibrahim@torontohousing.ca

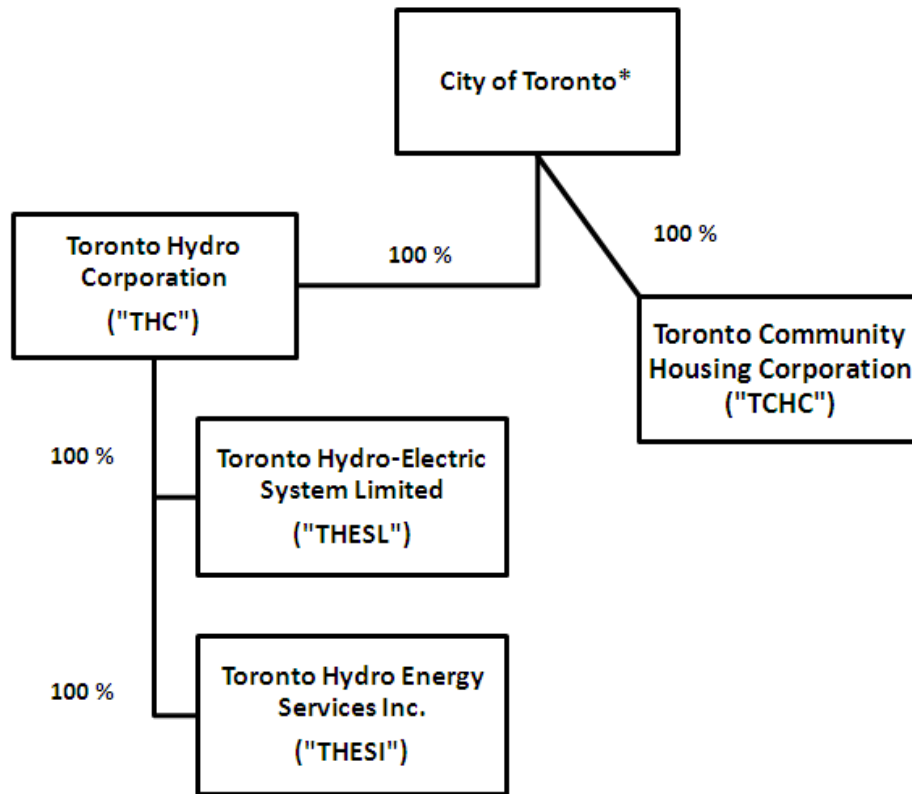
1.1.2 Other Parties to the Transaction or Project

Name of Other Party Toronto Hydro-Electric System Limited ("THESL")	File No: (Board Use Only)
Address of Head Office 14 Carlton Street Toronto, Ontario M5B 1K5	Telephone Number 416.542.2627
	Facsimile Number 416.542.3024
	E-Mail Address dcoban@torontohydro.com
Name of Individual to Contact Ms. Daliana Coban Regulatory Counsel	Telephone Number 416.542.2627
	Facsimile Number 416.542.3024
	E-Mail Address dcoban@torontohydro.com

1.2 Relationship between Parties to the Transaction or Project

1.2.1	<i>Attach a list of the officers, directors and shareholders of each of the parties to the proposed transaction or project.</i>
	<p><u>City of Toronto</u></p> <p>Section 125(1) of the <i>City of Toronto Act, 2006</i> ("COTA") provides that the City of Toronto is continued as a body corporate composed of the inhabitants of its geographic area. The powers of the City are exercised by City Council and the Mayor of the City is the head of Council. Currently, the Mayor of Toronto is John Tory. The City of Toronto is the sole shareholder of the Toronto Hydro Corporation.</p>

	<p><u>Toronto Community Housing Corporation</u></p> <p>Officers:</p> <p>Greg Spearn - Interim President & Chief Executive Officer, Chief Development Officer Jason Gorel - Chief Financial Officer Pamela C. Spencer - General Counsel & Corporate Secretary, Interim VP, Human Resources</p> <p>Directors:</p> <p>N.W. (Bud) Purves Munira Abukar Maria Augimeri Ana Bailao Zahir Bhaidani Christian Buhagiar Brian Kwan Karen Newman Frances Nunziata Cesar Palacio Catherine Wilkinson Jennifer Wood Aubrey Wubbenhorst</p> <p>Shareholder:</p> <p>City of Toronto</p>
1.2.2	<p><i>Attach a corporate chart describing the relationship between each of the parties to the proposed transaction or project and each of their respective affiliates.</i></p>



*A chart showing the City of Toronto's Agencies and Corporations is available at:
<http://www1.toronto.ca/City%20of%20Toronto/City%20Managers%20Office/Agencies%20and%20Corporations/Files/pdf/Agency%20Chart.pdf>

1.3 Description of the Businesses of Each of the Parties

1.3.1	<i>Attach a description of the business of each of the parties to the proposed transaction or project, including each of their affiliates licenced under the OEB Act to operate in Ontario for the generation, transmission, distribution, wholesaling or retailing of electricity or providing goods and services to companies licenced under the OEB Act in Ontario ("Electricity Sector Affiliates").</i>
	<p><u>City of Toronto</u></p> <p>The City of Toronto is Canada's largest city, the fourth largest in North America, and home to a population of approximately 2.8 million people.</p> <p>The City of Toronto is a municipal corporation continued under COTA. The City provides municipal government services to residents and businesses within its defined borders. Its authority, powers, duties and responsibilities are legislatively defined in COTA. Subject to certain exceptions, the City has the capacity, rights, powers and privileges of a natural person for the purpose of exercising its authority under COTA or any other act.</p> <p>Toronto's municipal government has 44 elected City Councillors who, along with the Mayor, make up Toronto's City Council. Decision making is undertaken through Council unless delegated to committees that are part of City Council, as well as through various agencies, boards, commissions and corporations that are controlled by the City.</p> <p><u>Toronto Community Housing Corporation</u></p> <p>Toronto Community Housing Corporation ("TCHC") manages a housing portfolio of approximately 58,500 units in over 2,000 buildings across 350 developments. The Corporation has a mandate to provide affordable rental housing for low and moderate-income households in the City of Toronto. Government funding subsidizing the operations is administered by the City's Shelter, Support and Housing Division acting as the Service Manager under the <i>Housing Services Act, 2011</i>. Toronto Community Housing is incorporated under the <i>Ontario Business Corporations Act</i>, with the City of Toronto as its sole shareholder.</p> <p><u>Toronto Hydro Corporation</u></p> <p>Toronto Hydro Corporation ("THC") is a holding company. The sole shareholder of THC is the City of Toronto. THC supervises the operations of, and provides corporate and management services and strategic direction to, its wholly-owned subsidiaries, THESL and THESI.</p> <p><u>THESL</u></p> <p>THESL owns and operates the electricity distribution system in the City of Toronto, which delivers electricity to approximately 730,000 customers. THESL is a licensed distributor pursuant to distribution licence ED-2002-0497. THESL is a wholly-owned subsidiary of Toronto Hydro Corporation.</p> <p><u>THESI</u></p> <p>THESI holds a 55.1% interest in, and operates, a 750 kW wind turbine generator located at Exhibition</p>

	Place. The remaining 44.9% interest in the wind turbine generator is owned by TREC Windpower Co-operative (No. 1) Inc., with whom THESI entered into a Joint Venture Agreement in 2002. THESI also provides street lighting system maintenance and capital improvement services to the City of Toronto. THESI is a wholly-owned subsidiary of Toronto Hydro Corporation.
1.3.2	<i>Attach a description of the geographic territory served by each of the parties to the proposed transaction or project, including each of their Electricity Sector Affiliates, if applicable, and the geographic location of all existing generation facilities.</i>
	<p><u>City of Toronto</u></p> <p>The City of Toronto is on the northwest shore of Lake Ontario and covers 641 square kilometers, stretching 43 km from east to west and 21 km from north to south at its longest points. The locations of its generation facilities are described in Schedules 'A' (co-owned facilities) and 'B' to the accompanying cover letter.</p> <p><u>TCHC</u></p> <p>TCHC operates within the City of Toronto. The locations of its generation facilities are described in Schedule 'B' to the accompanying cover letter.</p> <p><u>THESL</u></p> <p>THESL is licensed under ED-2002-0497 as the distribution company which is authorized to distribute and sell electricity in the City of Toronto. In addition to the 12 generation facilities owned by THESL which are the subject of this s. 80 notice, as listed in Schedule 'A' of the accompanying cover letter, THESL owns:</p> <ul style="list-style-type: none"> • a 250 kW solar PV rooftop facility at the Better Living Centre, located at 195 Princes' Blvd. in Exhibition Place, Toronto; and • a 250 kW solar PV rooftop facility at the THESL building located at 500 Commissioners Street, Toronto. <p><u>THESI</u></p> <p>THESI provides street lighting system maintenance and capital improvement services to the City of Toronto. As indicated in Schedule 'A' of the accompanying cover letter, THESI also holds a 55.1% ownership interest in a wind turbine located near the intersection of Alberta Circle and Yukon Place in Exhibition Place, Toronto.</p>
1.3.3	<i>Attach a breakdown of the annual sales (in C\$, and in MWh) as of the most recent fiscal year end of the existing generation output among the IESO Administered Markets ("IAM), bilateral contracts, and local distribution companies.</i>
	<p>The City of Toronto has a 49% ownership interest in 10 of the facilities that are the subject of the related notice. Collectively, these ten facilities generated 980.5 MWh in 2013. Based on its ownership interests in these facilities, the City of Toronto's proportionate share of the output of the facilities is 480.4 MWh. The City's proportionate share of the revenue from this generation in 2013 was \$342,525.</p>

	<p>The City of Toronto's 19 generation facilities that are the subject of this notice generated a total of 968.3 MWh in 2013, for which the City received revenues of \$678,455.</p> <p>TCHC's 38 generation facilities that are the subject of this notice generated a total of 1,730.7 MWh in 2013, for which TCHC received revenues of \$615,508.05.</p>
1.3.4	<i>Attach a list identifying all relevant Board licences and approvals held by the parties to the proposed transaction or project and each of their Electricity Sector Affiliates, and any applications currently before the Board, or forthcoming. Please include all Board file numbers.</i>
	<p>THESL holds Electricity Distribution Licence ED-2002-0497 and currently has a 2015-2019 Custom Incentive Rate-Setting (CIR) Electricity Distribution Rate Application before the Board (EB-2014-0116).</p> <p>THESI holds Electricity Retailer Licence ER-2010-0050 and, together with TREC, its co-owner for the Exhibition Place wind turbine, holds Electricity Generator Licence EG-2002-0440.</p>

1.4 Current Competitive Characteristics of the Market

1.4.1	<i>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to the completion of the proposed transaction or project.</i>
	<p>THESL's generation capacity, without the 12 THESL-owned facilities that are the subject of its s. 80 notice, is 0.5 MW. The total capacity of the 12 THESL-owned facilities that are the subject of its s. 80 notice is 2.06 MW, of which THESL's proportionate share is 1.56 MW. THESL's total generation capacity is therefore 2.06 MW.</p> <p>THESI is an affiliate of THESL. THESI's generation capacity, without the 1 THESI-owned facility that is the subject of this application, is 0 MW. The total capacity of the 1 THESI-owned facility that is the subject of this application is 0.75 MW and, based on its 55.1% ownership interest, THESI's proportionate share of this capacity is 0.41 MW. TREC's proportionate share of the capacity from this facility is therefore 0.34 MW. Prior to THESI increasing its interest in this facility from 50% to 55.1%, each of THESI's and TREC's proportionate share of capacity was 0.375 MW.</p> <p>The City of Toronto is an affiliate of THESL. The City of Toronto's generation capacity without the 19 facilities that are directly owned by the City or the 10 facilities in which the City is a co-owner with THESL, all of which are the subject of its s. 80 notice, is 0 MW. The total capacity of the 19 City-owned facilities that are the subject of its s. 80 notice is 7.17 MW. The total capacity of the 10 co-owned facilities is 1.02 MW, of which the City's proportionate share is 0.5 MW. The City of Toronto's total generation capacity is therefore 7.67 MW.</p> <p>TCHC is an affiliate of THESL. TCHC's generation capacity, without the 38 TCHC-owned facilities that are the subject of its s. 80 notice, is 0 MW. The total capacity of the 38 TCHC-owned facilities that are the subject of its s. 80 notice is 1.80 MW. TCHC's total generation capacity is therefore 1.80 MW.</p> <p>Based on the foregoing, the total generation capacity of THESL and its affiliates without the facilities that are the subject of this s. 80 notice is 0.5 MW. The total generation capacity of the THESL and affiliate-owned facilities that are the subject of this notice is 11.44 MW. Therefore, the total generation capacity of THESL and its affiliates taking into account all facilities is 11.94 MW.</p>

1.4.2	<i>Describe the generation market share based on actual MWh production as a percent of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, prior to completion of the proposed transaction or project.</i>
	<p>Annual Primary Demand in Ontario for 2013 was 140.7 TWh, or 140,700,000 MWh.</p> <p>THESL's two existing rooftop solar facilities, at the Better Living Center in Exhibition Place and at 500 Commissioners Street, generated a total of 786.2 MWh in 2013, which represents approximately 0.0005588% of the Annual Primary Demand.</p> <p>THESL has a 51% ownership interest in 10 of the facilities that are the subject of this s. 80 notice and a 100% ownership interest in the remaining 2 facilities that are the subject of this notice. Collectively, these 12 facilities generated a total of 1,018.8 MWh in 2013. Based on its ownership interests in these facilities, THESL's proportionate share of the output of these facilities is 538.4 MWh, which represents approximately 0.00038% of the Annual Primary Demand in Ontario.</p> <p>When THESL's existing generation of 786.2 MWh in 2013 is combined with its 538.4 MWh of generation from the facilities that are the subject of this notice, the total is 1,324.6 MWh, which represents approximately 0.00094% of the Annual Primary Demand in Ontario.</p> <p>THESI has a 55.1% ownership interest in the existing wind turbine located at Exhibition Place, which generated a total of 747.3 MWh in 2013. Based on its ownership interest in the facility, THESI's proportionate share of the facility's output is 411.76 MWh, which represents approximately 0.00029% of the Annual Primary Demand.</p> <p>The City of Toronto has a 49% ownership interest in 10 of the facilities that are the subject of this s. 80 notice. Collectively, these ten facilities generated 980.5 MWh in 2013. Based on its ownership interests in these facilities, the City of Toronto's proportionate share of the output of the facilities is 480.4 MWh, which represents approximately 0.00034% of the Annual Primary Demand.</p> <p>The City of Toronto's 19 generation facilities that are the subject of this notice generated a total of 968.3 MWh in 2013, which represents approximately 0.0006882% of the Annual Primary Demand.</p> <p>When the City of Toronto's proportionate share of the generation that is the subject of this notice and that it co-owns with THESL, being 480.4 MWh, is combined with its 968.3 MWh of generation from the facilities that are the subject of this notice and for which it is the sole owner, the total is 1,448.7 MWh, which represents approximately 0.001029% of the Annual Primary Demand.</p> <p>The Toronto Community Housing Corporation's 38 generation facilities that are the subject of this notice generated a total of 1,730.7 MWh in 2013, which represents approximately 0.001230% of the Annual Primary Demand.</p>

1.5 Description of the Proposed Transaction or Project and Impact on Competition – General

1.5.1	<i>Attach a detailed description of the proposed transaction or project, including geographic locations of proposed new transmission or distribution systems, or new generation facilities.</i>
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	Descriptions of the City and TCHC-owned generation facilities, including their locations, are provided in Schedule 'B' to the accompanying letter.
1.5.2	<i>Describe the generation capacity (in MW), within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</i>
	See response to 1.4.1, above.
1.5.3	<i>Describe the generation market share based on anticipated MWh production as a percentage of the Annual Primary Demand, within the Province of Ontario, of the parties to the proposed transaction or project, including each of their respective Electricity Sector Affiliates, after the completion of the proposed transaction or project.</i>
	See response to 1.4.2, above.
1.5.4	<i>Attach a short description of the impact, if any, of the proposed transaction or project on competition. If there will be no impact on competition, please state the reasons. Cite specifically the impacts of the proposal on customer choice regarding generation, energy wholesalers, and energy retailers.</i>
	The generation facilities that are the subject of this notice do not now and have not ever had an impact on competition. If notices under Section 80 of the Act had been filed prior to the commencement of construction for each of these facilities individually, in accordance with the requirements of that provision, no impacts on competition would have been found. The generation capacity of each facility, whether considered individually or in aggregate, represents a very small fraction of the overall supply capacity in Ontario and the annual electricity actually supplied from these facilities represents a very small fraction of the annual energy demand in Ontario. In addition, some of these facilities are located behind the meter where their potential impacts on the market are even more remote. Accordingly, these facilities do not and have not affected customer choice regarding generation, energy wholesalers or energy retailers.
1.5.5	<i>Provide confirmation that the proposed transaction or project will have no impact on open access to the transmission or distribution system of the parties of their affiliates. If open access will be affected explain how and why.</i>
	Confirmed. The generation facilities have not and will not have any impact on open access to THESL's distribution system. THESL has applied its standard interconnection processes and requirements in respect of each of the generation facilities, whether developed by THESL or a THESL affiliate. These processes and requirements have been applied without regard to who the project proponent is and no priority access has been given to any THESL or THESL-affiliated facilities.

1.6 Other Information

1.6.1	<i>Attach confirmation that the parties to the proposed transaction or project are in compliance with all licence and code requirements, and will continue to be in compliance after completion of the proposed transaction or project.</i>
	Neither the City of Toronto nor TCHC are licensed utilities. To the extent that the Codes apply to the City and TCHC as unlicensed generators, it is the City's and TCHC's understanding that they are and will continue to be in compliance after completion of the relevant projects.

**PART II: SECTION 80 OF THE ACT-TRANSMITTERS AND DISTRIBUTORS ACQUIRING AN INTEREST
IN GENERATORS OR CONSTRUCTIONG A GENERATION FACILITY**

2.1 Effect on Competition

2.1.2	<i>Describe whether the proposed generation output will be primarily offered into the IAM, sold via bilateral contracts, or for own use.</i>
	The generation output from the 19 City-owned generation facilities and the 38 TCHC-owned generation facilities is and will be primarily be offered into the IAM pursuant to FIT and microFIT or RESOP contracts with the OPA and supplied into THESL's distribution system. Three City-owned facilities and one TCHC-owned facility will instead be used for load displacement.
2.1.3	<i>Provide a description of the generation including fuel source, technology used, maximum capacity output, typical number of hours of operation in a year, and peaking versus base-load character.</i>
	See Schedule 'B' to the accompanying letter.
2.1.4	<i>Provide details on whether the generation facility is expected to sign a "must run" contract with the IESO.</i>
	The generation facilities are not expected to sign "must run" contracts with the IESO.
2.1.5	<i>Provide details of whether the generation facility is expected to serve a "load pocket", or is likely to be "constrained on" due to transmission constraints.</i>
	The generation facilities will not serve any "load pockets" and they are not likely to be "constrained on" due to transmission constraints.

2.2 System Reliability

Section 2.2 must be completed by applicants who are claiming that the proposed transaction or project is required for system reliability under section 82(2)(b) of the Act.

This section is not applicable.

2.2.1	Provide reasons why the proposal is required to maintain the reliability of the transmission or distribution system. Provide supporting studies.
2.2.2	Discuss the effect of the proposal on the adequacy (ability of supply to meet demand) of supply in the relevant control area or distribution region, citing effects on capacity plus reserve levels in comparison to load forecasts.
2.2.3	Discuss the effect of the proposal on the security (ability of supply to respond to system contingencies) of supply.
2.2.4	Provide a copy of the IESO Preliminary System Impact Assessment Report, if completed, and the IESO Final System Impact Assessment Report, if completed. If the IESO is not conducting a System Impact Assessment Report, please explain.

PART III: SECTION 81 OF THE ACT-GENERATORS ACQUIRING AN INTEREST IN OR CONSTRUCTING A TRANSMISSION OR DISTRIBUTION SYSTEM

This section is not applicable.

3.1.1	Provide a description of the transmission or distribution system being acquired or constructed.
3.1.2	Provide details on whether the generation facilities owned by the acquiring company are or will be directly connected to the transmission or distribution system being acquired or constructed.
3.1.3	Provide details of whether the generation facility is expected to serve a “load pocket”, or is likely to be “constrained on” due to transmission constraints.
3.1.4	Provide details on whether the generation facilities are expected to sign a “must run” contract with the IESO.

How to Contact the Ontario Energy Board

The Ontario Energy Board is
located at: P.O. Box 2319
2300 Yonge Street, Suite 2701
Toronto, Ontario
M4P 1E4

Telephone:	416-481-1967
Toll Free Number:	1-888-632-6273
Fax:	416-440-7656
Website:	http://www.oeb.gov.on.ca
Board Secretary's e-mail address:	boardsec@otb.gov.on.ca