



Jay Shepherd

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BY EMAIL and RESS

January 9, 2015
Our File No. 20140116

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

Attn: Daliana Coban, Regulatory Counsel

Dear Ms. Coban:

Re: EB-2014-0116 – Toronto Hydro 2015-2019 Rates – List of PSE Studies

We are counsel for the School Energy Coalition (“SEC”). SEC writes in response to your letter to the Board dated January 7th 2015, providing an updated response to interrogatory 1B-BOMA-61, which SEC requested and was originally refused at the Technical Conference.

In your letter, you provide that upon request from parties, Toronto Hydro will provide copies of requested studies contained in the updated interrogatory response, subject to any confidentiality treatment that Toronto Hydro may request on PSE's behalf.

As Toronto Hydro will recall from the Technical Conference, SEC's request was made to allow parties and the Board to assess the expertise of the authors of the *Capital Requirements for Serving Development Environment* study, Erik S. Sonju, Steve Hall, and Amanda Jutrzonka. This need for is because in the original interrogatory response, THESL responded by stating that none of the studies prepared by the authors in the last ten years were similar to the *Serving Development Environment* study.

SEC's request at the Technical Conference, for all studies undertaken by the authors in the last 10 years, was that so it could assess the expertise of the authors in undertaking such a study, considering they had not done a similar one before (or at least in the last 10 years).

SEC has reviewed the list of PSE studies that Toronto Hydro has provided, and finds that the list to be unhelpful in determining which studies it needs to review.



First, as SEC understands it, the list contains all relevant PSE studies in the last two years, not simply those authored by Erik S. Sonju, Steve Hall, or Amanda Jutrzonka. This does not help parties or the Board assess the expertise of the authors of the current study.

Second, the list appears to have been generated from an internal PSE database, which uses acronyms and short forms in the project names. This does not allow SEC, or any other party, the necessary information to determine which studies it should review.

In the interests of focusing on what is most relevant, and in lieu of asking for copies of all studies on the list, SEC requests that Toronto Hydro provide it with copies of the studies on the list that were authored by each of Erik S. Sonju, Steve Hall, and Amanda Jutrzonka, and which Toronto Hydro believes best demonstrates their expertise relevant to their authoring of the *Capital Requirements for Serving Development Environment* study.

Yours very truly,

JAY SHEPHERD P. C.

Original signed by

Mark Rubenstein

cc: Kirsten Walli, Board Secretary
Wayne McNally, SEC (email)
Jay Shepherd, JSPC (email)
Interested Parties (email)