Andrew J. Sasso

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April 12, 2017

via RESS e-filing – signed original to follow by courier

Ms. Kirsten Walli **Board Secretary** Ontario Energy Board PO Box 2319 2300 Yonge Street, 27th floor Toronto, ON M4P 1E4

Dear Ms. Walli:

Regional Planning and Cost Allocation Review Policy Consultation Re:

EB-2016-0003

Toronto Hydro-Electric System Ltd. (Toronto Hydro) writes in respect of the above-noted matter (the Consultation).

We hereby request that the Ontario Energy Board (the OEB) accept Toronto Hydro's application to participate in the Consultation and that this letter be considered Toronto Hydro's motion pursuant to Rules 22.05 and 22.09 of the OEB's Rules of Practice and Procedure. Toronto Hydro requests that the OEB dispose of this motion without a hearing, per Rule 22.06.

Toronto Hydro is a local distribution utility licensed to distribute electricity in the City of Toronto by the OEB under License ED-2002-0497. We have reviewed the Consultation materials and the OEB's working group notes and determined that a number of the issues being considered by the OEB are of direct impact and significant importance to Toronto Hydro and its approximately 709,000 residential, commercial and industrial customers.

Specifically, Toronto Hydro is interested in: (1) ensuring that potential Transmission System Code (TSC) and Distribution System Code (DSC) amendments provide for a coherent and symmetrical approach to implementing the proportional benefit approach to cost allocation; (2) appropriately balancing fairness in cost allocation with the need to effectively and proactively conduct regional planning and implementation of regional infrastructure plans; and (3) ensuring that regional planning and cost allocation are sufficiently flexible to respond to the rapid growth and technological changes facing many electricity distributors in Ontario.

As an electricity distributor servicing Canada's largest city, Toronto Hydro brings an important perspective on how the matters covered by the consultation are likely to impact and interact with electrical distribution system upgrades and expansions necessary to support the infrastructure plans, intensification of land uses and electrification of transportation occurring and planned for the City of Toronto.

Toronto Hydro accepts the record in the Consultation as-presented and seeks to be involved in future steps of the Consultation, including, without limitation, making submissions on any proposed DSC and TSC amendments and cost allocation methodologies. When it initially commenced, Toronto Hydro did not fully appreciate the scope and nature of this proceeding and its direct impact on Toronto Hydro and its customers.

Yours truly,

Andrew J. Sasso

Director, Regulatory Affairs

Toronto Hydro-Electric System Limited regulatoryaffairs@torontohydro.com

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cc: