

VIA EMAIL to [ConditionsofService@TorontoHydro.com](mailto:ConditionsofService@TorontoHydro.com)

December 11, 2018

Toronto Hydro, Regulatory Affairs  
14 Carlton Street  
Toronto, Ontario M5B 1K5

## **RE: Proposed Changes to 2019 Conditions of Service**

The Greater Toronto Apartment Association (“GTAA”) represents the interests of the multi-family, purpose-built rental housing industry. Our members own and manage more than 150,000 units of multi-family, purpose-built rental housing in the GTA, with the vast majority in the City of Toronto. Many GTAA Members’ buildings contain Toronto Hydro vaults exclusively occupied by Toronto Hydro equipment.

We are writing on behalf of the GTAA in regard to your posting of proposed revisions to your 2019 Conditions of Service. Specifically, to express our concern and opposition to Toronto Hydro’s proposed revision to the long-standing policy of annual inspections of Toronto Hydro vaults for our mutual benefit and protection.

For decades, Toronto housing service providers have arranged annual inspections of apartment-owned vaults housing Toronto Hydro high-voltage electric equipment. These inspections have been coordinated with Toronto Hydro for the mutual benefit of ensuring the sustainable protection of the Toronto Hydro equipment, safety of those attending and to strive for the uninterrupted continuity of electricity service to our tenants. These inspections, while difficult to coordinate, have been arranged with no compensation required from either party to the other in respect of the mutual benefit of this inspection.

We have recently become aware that it is Toronto Hydro’s proposal that housing providers should now pay for this visit under the premise that “those customers using Toronto Hydro resources pay their share of the cost” (see attached notice received upon inquiry). It is unfortunate this policy change was discovered through communication on other work and that the attached notice does not inform the recipient of the comments process to which we are responding.

The proposal by Toronto Hydro that housing providers compensate Toronto Hydro to attend and ensure safety during an annual inspection that contributes to the on-going safety and reliability of Toronto Hydro assets does not, in our view, constitute a situation of customers using Toronto Hydro resources. As Toronto Hydro knows the Fire Code<sup>1</sup> requires that the vault is equipped with a heat detector and that these heat detectors must be inspected annually<sup>2</sup>.

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<sup>1</sup> Ontario Regulation 213/07, Fire Code Section 9.6.2.14

<sup>2</sup> CAN/ULC S-536

In our view, the decades of this service being in the public interest is captured over time. As an example, we submit that an enduring priority on this matter is captured in the City of Toronto's Staff/Action report that emphasizes the public interest nature of these inspections.<sup>3</sup>

In summary, we respectfully request that Toronto Hydro retract this aspect of the revisions to its proposed Conditions of Service 2019. If unwilling, we respectfully request the company's defined position in opposition to our request, to be filed in conjunction with Toronto Hydro's 2020-2024 rates proceeding, wherein we will reserve our rights on this and other matters. Further, we request that Toronto Hydro provide the undersigned with its response in a timely manner for consideration of further action required.

Respectfully submitted on behalf of the GTAA,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

- c. Daryl Chong, Greater Toronto Apartment Association  
Tony Irwin, Federation of Rental-housing Providers of Ontario  
Andrew Sasso, Toronto Hydro  
Josie Scioli, City of Toronto  
Jim Jessop, Deputy Fire Chief, Toronto Fire  
Board Secretary, Ontario Energy Board, Proceeding EB-2018-0165  
Lawrie Gluck, Case Manager Ontario Energy Board, Proceeding EB-2018-0165  
Mark Rubenstein, School Energy Coalition  
Mark Garner, Vulnerable Energy and Consumers Coalition

Attach.

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<sup>3</sup> <https://www.toronto.ca/legdocs/mmis/2016/ex/bgrd/backgroundfile-86715.pdf>



Dear Valued Customer,

Effective January 1, 2019, Toronto Hydro customers will be charged the cost of a Person in Attendance (PIA) when accessing customer-owned vaults. A PIA is a Toronto Hydro-qualified person who is on-site to ensure the protection of Toronto Hydro equipment located within a customer-owned vault. This update to the Conditions of Service ensures that those customers using Toronto Hydro resources pay their share of the cost.

All vault access appointments occurring on or after January 1, 2019 will be charged the cost of a PIA. The cost of the PIA's attendance will depend on the nature of the work being performed. In order to request a quote and/or schedule your vault access, please email us at [scheduler@torontohydro.com](mailto:scheduler@torontohydro.com).

Customers who own a vault located on their property are responsible for inspecting, maintaining and repairing their vault. Proper vault care includes regular maintenance to help ensure that the condition of the vault is acceptable to house Toronto Hydro's high voltage equipment. Ensuring that the structural integrity of the vault is sound, accessibility is not restricted, and surface grading is such that it does not pose any hazards to the public, are just a few examples of what's expected of vault owners to ensure that the vault and its surrounding area are safe while also decreasing the potential for outages and grid interruptions.

Safety is our top priority, which is why we lock all customer-owned vaults that contain high voltage electrical equipment. Coming into contact with any electrical equipment can be extremely hazardous and potentially fatal, which is why only qualified Toronto Hydro personnel are allowed to provide access to these vaults. Customers are not responsible for the repair of Toronto Hydro-owned equipment/assets within the vault, such as transformers and high-voltage primary cables.

We appreciate your cooperation and understanding. For more information or to schedule vault access, please contact us at [scheduler@torontohydro.com](mailto:scheduler@torontohydro.com) or 416-542-8000.

Sincerely,

Toronto Hydro



**DID YOU KNOW:** Toronto Hydro now accepts payment by Electronic Funds Transfer (EFT) and Online payment? With the click of a button, you can pay for services like vault access. Turn over to see how to use our new payment options.



## Instructions for Payment by Cheque

Please mail cheques to Toronto Hydro's office to the attention of Miscellaneous Accounts Receivable, 500 Commissioners St., Toronto, ON, M4M 3N7, or deliver in person from 8:00 a.m. to 4:30 p.m. (excluding weekends and statutory holidays).

Please make cheques payable to **Toronto Hydro-Electric System Limited** and write the job quotation or project address or project number in the memo field and attach a copy of the signed Job quotation/Short or Long Offer to Connect to help ensure timely posting of the payment.

## Instructions for Payment by Wire Transfer/Electronic Funds Transfer (EFT)

Please use the following banking information for making a payment to Toronto Hydro-Electric System Limited via wire transfer:

Payee Name: Toronto Hydro-Electric System Limited  
Address: 500 Commissioners Street, Toronto, ON, M4M 3N7  
Bank Name: Royal Bank of Canada  
Bank Address: 200 Bay Street, Toronto, Ontario, M5J 2L5  
Bank Number: 003  
Transit Number: 00002  
Bank Account Number: 1550573

## Instructions for Online Payment

Please use "**Toronto Hydro Projects**" as the payee and your Customer Account# (found on the invoice or job quotation) as the payee account#.

## General Instructions for EFT and Online Payments

Please e-mail the payment details to Toronto Hydro at **projectpayments@torontohydro.com** within 24 hours of completing wire transfer/EFT or online payment. This will help ensure accurate and timely processing of your payment.

Payment details to be provided via attaching signed Job quotation/Short or Long Offer to Connect or by providing the following itemized details:

Name of the Customer:  
Address of the work location (where service is to be performed):  
Customer telephone number:  
Payment Amount:  
Name of contact at Toronto Hydro:  
Job quotation or Project#:

### **DO NOT USE THE ABOVE BANKING INFORMATION TO PAY YOUR TORONTO HYDRO ELECTRICITY BILLS.**

**Wire transfer or online payments made as instructed above will not be posted to your electricity account. Where a copy of the signed document or the itemized details above are not provided, Toronto Hydro will return the payment. Toronto Hydro is not responsible for any delays that may be caused by payments made in error or by incorrect, incomplete or missing payment information.**