

DR QUINN & ASSOCIATES LTD.

VIA E-MAIL

December 20, 2018

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

RE: EB-2018-0165 Toronto Hydro 2020 Rates - GTAA Intervention Request

REQUEST & SUPPORT

We are writing on behalf of the Greater Toronto Apartment Association (“GTAA”) to request late intervention in the above subject proceeding.

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. Cost allocation and resulting rate changes have impact on our members and their tenants. As a not-for-profit organization, GTAA does not have other funding sources to ensure experienced representation to participate in and assist the Board in these regulatory proceedings. Therefore, GTAA would respectfully request a determination of eligibility for cost award in this proceeding.

ISSUES & INVOLVEMENT

Many GTAA Members’ buildings contain Toronto Hydro vaults exclusively occupied by Toronto Hydro equipment. 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). We are concerned that this policy change was discovered through communication on other work and that the attached notice does not inform the recipient of the comments process. This 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 Code¹ requires that the vault be equipped with a heat detector and that these heat detectors must be inspected annually².

¹ Ontario Regulation 213/07, Fire Code Section 9.6.2.14

² CAN/ULC S-536

DR QUINN & ASSOCIATES LTD.

The GTAA has pursued resolution of our concerns outside of this regulatory proceeding and will continue to do so. However, given the responses we have received from Toronto Hydro to this point, we believe that we may need to pursue our concerns through the regulatory process and submitted IR's earlier this week in respect of the Board's ordered timing. While our initial concern articulated above is very narrow in the scope of issues in this proceeding, we have made inquiry regarding other changes to the Conditions of Service and cost implications which may have been visited on our members in the Incentive Regulation Period. Our members strive to minimize cost increases which would eventually impact our tenants. Therefore, we would respectfully request the opportunity for greater involvement beyond our primary issue. If granted, we would accept the record to this point and would collaborate with other intervenors as would be expected by the Board.

REPRESENTATION

If the intervention requested is granted, then GTAA asks that further communications with respect to this matter be sent to the following:

Mr. Dwayne R. Quinn
DR QUINN & ASSOCIATES LTD.
130 Muscovey Drive,
Elmira, Ontario
N3B 3B7

Phone: (519) 500-1022

Email: drquinn@rogers.com

Thank you for your consideration of this request

Respectfully Submitted on Behalf of the GTAA,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. Toronto Hydro Regulatory Proceedings
 - D. Coban – Toronto Hydro
 - A. Sasso – Toronto Hydro
 - L. Gluck – OEB Staff
 - D. Chong – Greater Toronto Apartment Association
 - T. Irwin – Federation of Rental-housing Providers of Ontario



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.

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 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.