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RESPONSES TO OEB STAFF INTERROGATORIES

INTERROGATORY 1:

Reference(s): Updated Exhibit 1A, Tab 3, Schedule 1, Appendix B

- a) Please provide a detailed list of the 2018 financial figures that will be updated as part of the planned evidence update (Updated Exhibit 1A / Tab 3 / Schedule 1 / Appendix B / p. 2).
- b) Please advise whether Toronto Hydro-Electric System Limited (Toronto Hydro) expects that the 2018 financial figures will result in changes to its 2020-2024 proposals. For example, if 2018 actual closing rate base is lower than forecast in the pre-filed evidence will Toronto Hydro reduce its 2020-2024 rate base proposals to reflect the likelihood that its opening 2020 rate base will be lower than forecast

RESPONSE:

- a) Toronto Hydro will update the required 2018 financial figures as specified within the OEB’s Filing Requirements. Specifically, this includes the following:
- Capital expenditures (OEB Appendices 2-AA and 2-AB)
 - Overhead Expense (OEB Appendix 2-D)
 - Fixed Asset Continuity Schedule (OEB Appendix 2-BA)
 - Other Operating Revenues (OEB Appendix 2-H)
 - OM&A expenditures (OEB Appendices 2-JA to 2-JC)
 - Recoverable OM&A Cost per Customer and FTE (OEB Appendix 2-L)
 - Employee Costs / Compensation Table (OEB Appendix 2-K)

- Shared Services and Corporate Cost Allocation (OEB Appendix 2-N)

In addition to the above noted OEB appendices, Toronto Hydro intends to update year-end Deferral and Variance Account balances for 2018 actuals (Exhibit 9).

b) Toronto Hydro's plan is to manage its business within the funding levels sought in this application over the 2020-2024 period. The utility is in the process of executing its 2015-2019 capital plan and is strictly managing the execution of that plan in alignment with the 2018/2019 figures filed in this application. The utility anticipates that any variances in in-service additions between the 2015-2019 figures filed in this application and the final 2015-2019 figures will be immaterial.

1 **RESPONSES TO ASSOCIATION OF MAJOR POWER CONSUMERS IN ONTARIO**
2 **INTERROGATORIES**

3
4 **INTERROGATORY 1:**

5 **Reference(s):** **Exhibit 1A, Tab 3, Schedule 1, p. 8**
6 **Appendix 2-K**

7
8 At Ref#1, THESL provided an Organizational Chart.

9 a) Please provide the Organizational Structure that reflects the 67 Management
10 positions in 2020.

11
12
13 **RESPONSE:**

14 a) Toronto Hydro does not have an organizational chart for 2020. Please see Toronto
15 Hydro's response to interrogatory 1A-SEC-1 for Toronto Hydro's organizational chart
16 as of the time of filing. Toronto Hydro notes that the difference between the 2017 and
17 the 2020 overall numbers with respect to senior management positions is two,
18 projected to move from 69 to 67.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

INTERROGATORY 1:

Reference(s): Exhibit 1A

Please provide all materials provided to THESL's Board of Directors and Senior Executive Team regarding this Application and the underlying budgets and business plans. When did the Board of Directors approve the Application and the underlying Business Plan? When is the next Business Plan going to be completed?

RESPONSE:

A copy of the underlying Business Plan is filed as Appendix A. Please note that the Business Plan has been redacted to protect confidential information pertaining to Toronto Hydro's affiliates, as well as the utility's non-rate regulated business activities. Also, Toronto Hydro redacted information in the Business Plan that contains analysis for the purposes of unregulated business activities because this information is not relevant to deciding the issues in this proceeding.

The Business Plan was approved by the Board of Directors in November 2017. Toronto Hydro expects that the next Business Plan is going to be completed in November 2019. Toronto Hydro declines, on the basis of relevance, to provide any other materials supplied to the Board of Directors and Senior Management regarding the Application.

2018-20 Corporate Business Plan

Board of Directors Meeting

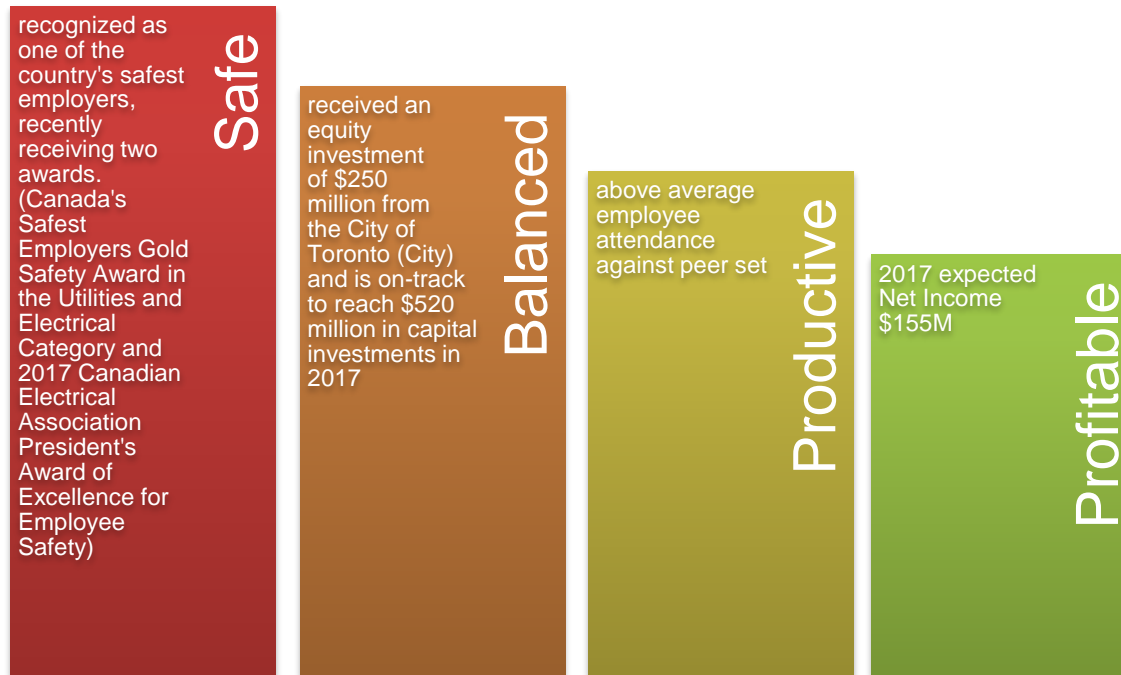
November 23, 2017

Draft for review and approval

This report contains confidential, financial, commercial and/or technical information that belongs to Toronto Hydro. The report has not been made public, has had limited circulation within Toronto Hydro and has been continuously treated as confidential. As it is reasonable to expect that the disclosure of the information in this report at this time could prejudice the competitive position of Toronto Hydro and be injurious to its interests and further, could result in undue gain to a third party at the expense of Toronto Hydro or another organization, any copying, disclosure or other distribution of this report or its content by members of the Board strictly prohibited.



State of the Union



- 2018-20 Business Plan developed to further advance achievements in the years to come.
- Budget highlights (Net Income, Debt to Equity, Regulatory Application, Organization of business activities to support business development strategy and municipal policy)

Legal Entities

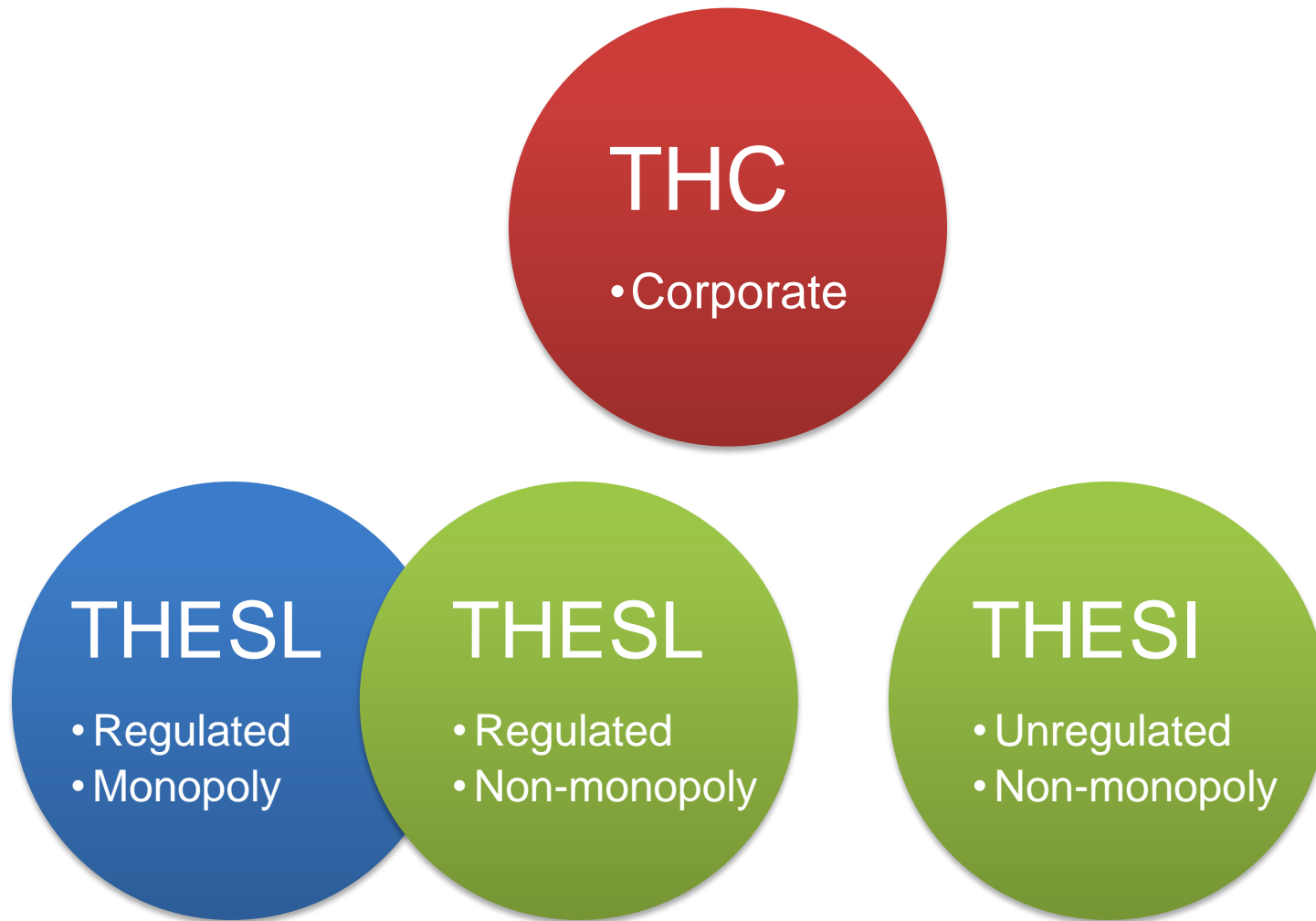
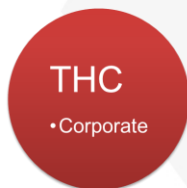


Table of Contents

| Corporate | Monopoly Budget | New Business Development | Pro Forma Statements |
|--|---|---|--|
| Statement of Income by Entity Governance Activities & Costs | Assumptions Regulatory Update Monopoly Budget Consolidated Capital Program Pro Forma Financial Statements | Statement of Income Revenues Expenses | Income Balance Sheets Cash Flows |



CORPORATE

Statement of Income by
Entity

Governance Activities &
Costs

2018 Statement of Income

| Statements of Income (in millions of Canadian dollars) | | 2018 Budget | | |
|---|-----------|--------------|--------------|--------------|
| For the years ended December 31 | Corporate | Monopoly | Non-Monopoly | Consolidated |
| Energy sales | | 3,063 | | |
| Distribution revenue | | 668 | | |
| Other revenues | | 66 | | |
| Total Revenues | | 3,797 | | |
| Energy purchases | | 3,063 | | |
| Operating expenses | | 279 | | |
| Depreciation and amortization | | 233 | | |
| Total Expenses | | 3,575 | | |
| Finance costs | | (81) | | |
| Gain on disposal of property, plant and equipment | | 66 | | |
| Income (loss) before income taxes | | 207 | | |
| Income tax (expense) recovery | | (69) | | |
| Net movements in regulatory balances | | (17) | | |
| Net movements in regulatory balances arising from deferred tax assets | | 30 | | |
| Net income after net movements in regulatory balances | | 151 | | |

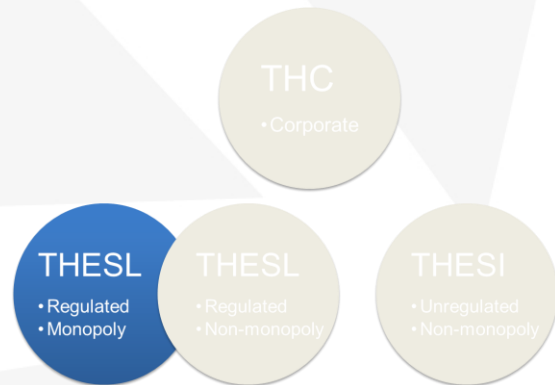
- Intercompany provisions and finance costs are reflected in operating entity to which item relates

2018 Statement of Income Corporate

| Statements of Income (in millions of Canadian dollars) | | 2018 Budget | | |
|---|--|-------------|--------------|---------------------------|
| For the years ended December 31 | | Corporate | Monopoly | Non-Monopoly Consolidated |
| Energy sales | | | 3,063 | |
| Distribution revenue | | | 668 | |
| Other revenues | | | 66 | |
| Total Revenues | | | 3,797 | |
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Operating Expenses





MONOPOLY BUDGET

Assumptions

Regulatory Update

Monopoly Budget

Consolidated Capital Program

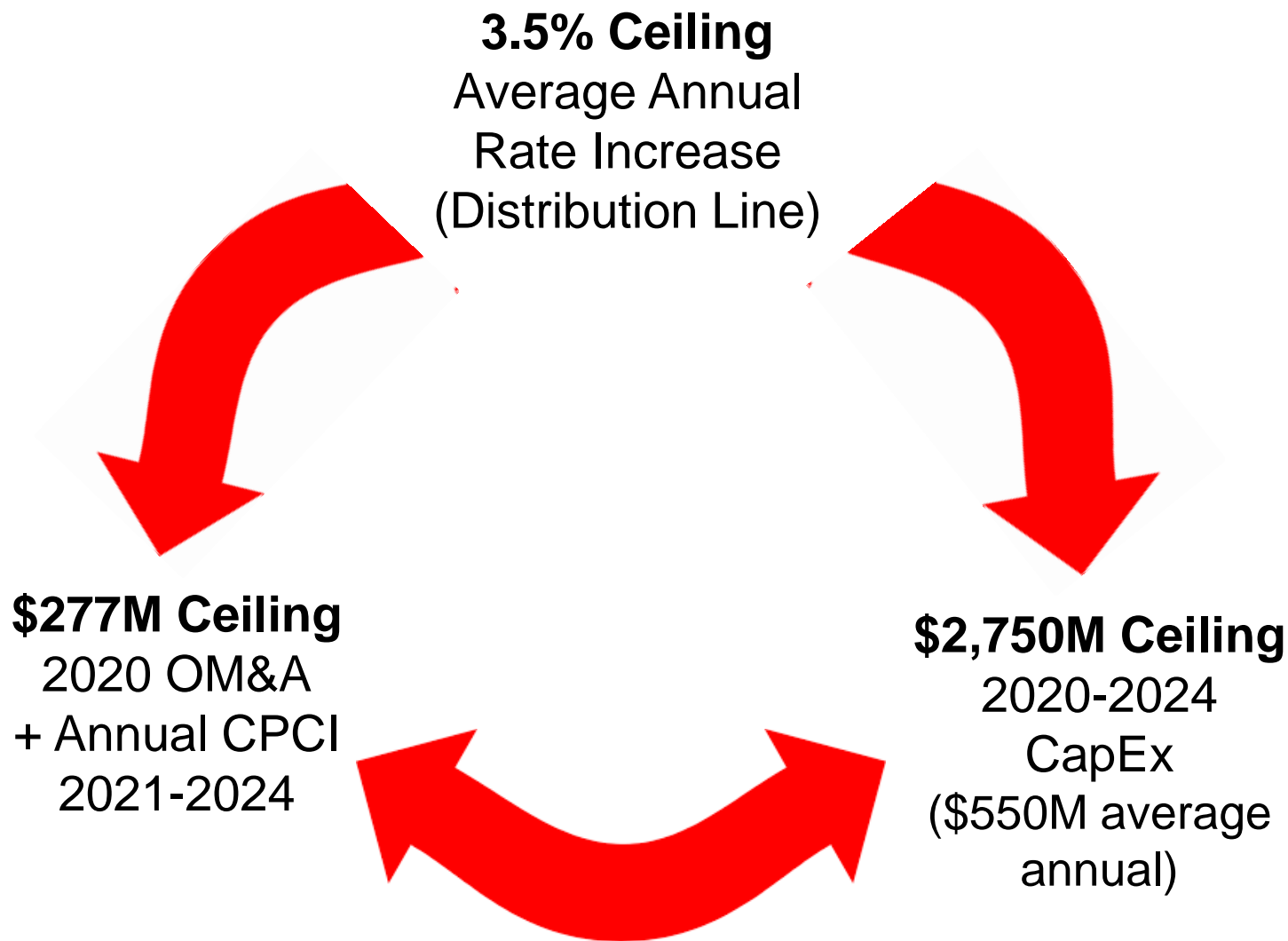
Pro Forma Financial Statements

Budget Assumptions

The 2018 business plan (including the budget and corporate scorecard) was created under the following assumptions:

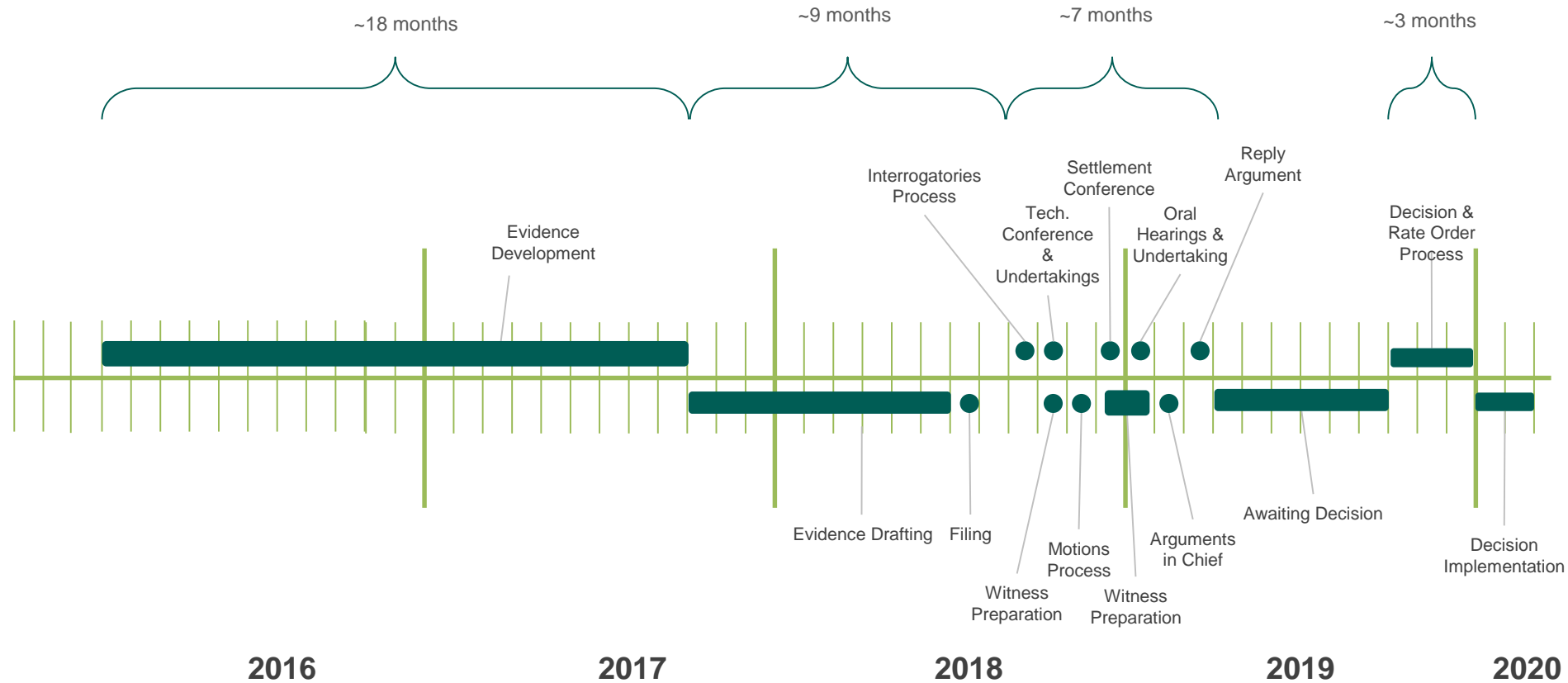
- Consolidated debt to equity ratio below 60:40
- Toronto Hydro's 'A' credit rating is maintained
- Dividend policy based on 60% prior year net income
- Based on existing operating budget and model
 - Street Lighting operations
 - Hours of work, roadway access

Regulatory Application



2020-2024 Rate Application Schedule

We are entering 2017, year 3 out of the 5 year rate period



2018 Statement of Income Monopoly

| Statements of Income (in millions of Canadian dollars) | | 2018 Budget | | |
|---|-----------|--------------|--------------|--------------|
| For the years ended December 31 | Corporate | Monopoly | Non-Monopoly | Consolidated |
| Energy sales | | 3,063 | | |
| Distribution revenue | | 668 | | |
| Other revenues | | 66 | | |
| Total Revenues | | 3,797 | | |
| Energy purchases | | 3,063 | | |
| Operating expenses | | 279 | | |
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| Net income after net movements in regulatory balances | | 151 | | |

Revenues

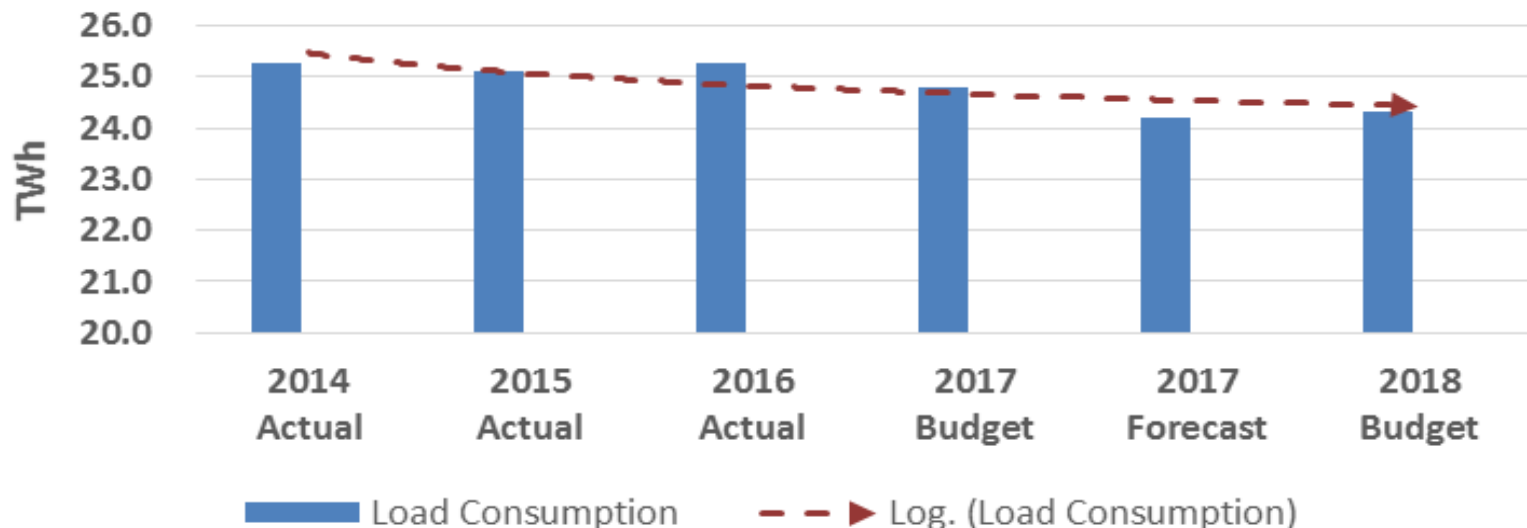
| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|--------------------------------|----------------|----------------|------------------|----------------|---------------|
| Distribution Revenue | 647.9 | 742.4 | 719.8 | 668.2 | (51.6) |
| Other Revenues | 62.7 | 60.3 | 80.6 | 65.6 | (15.0) |
| Total Monopoly Revenues | 710.6 | 802.7 | 800.4 | 733.8 | (66.6) |

- Decrease in distribution revenue primarily due to disposal of \$80M in regulatory settlement variances in 2018, which are offset in net movement line
- Decrease in Other Revenues primarily due to recognition in 2017 of excess Expansion Deposits, higher pole rentals and expected recognition of A/R credits

Load Forecast

| (TWh) | 2014 Actual | 2015 Actual | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget |
|-------------------------|----------------|----------------|----------------|----------------|------------------|----------------|
| Load Consumption | 25.3 | 25.1 | 25.3 | 24.8 | 24.2 | 24.3 |
| Year over Year % Change | -0.2% | -0.5% | 0.6% | -1.8% | -2.5% | 0.5% |

- Loads over the 2014-2018 period exhibit an overall declining trend as customer growth is offset by declining average use and CDM impacts



Energy Purchases

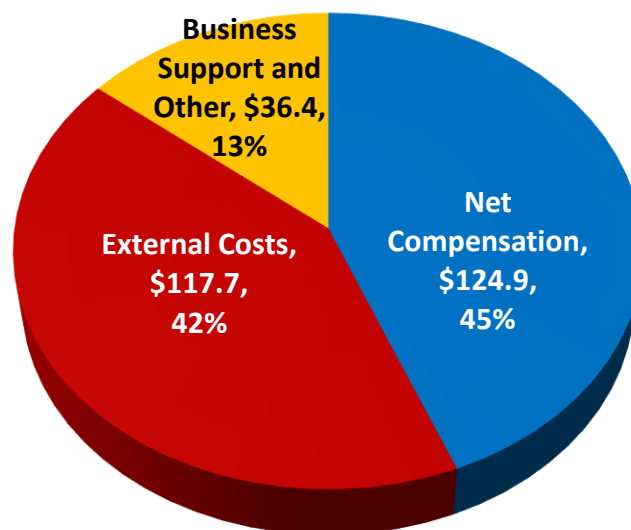
| (\$ Millions) | 2014 Actual | 2015 Actual | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget |
|-------------------------------|----------------|----------------|----------------|----------------|------------------|----------------|
| Commodity Charges | 2,259.5 | 2,504.4 | 2,790.6 | 2,814.3 | 2,692.3 | 2,675.5 |
| Transmission Charges | 299.9 | 297.2 | 299.0 | 307.7 | 283.6 | 292.9 |
| Wholesale Service Charges | 141.0 | 96.9 | 127.3 | 148.8 | 110.2 | 94.7 |
| Total Energy Purchases | 2,700.4 | 2,898.5 | 3,216.9 | 3,270.8 | 3,086.1 | 3,063.1 |
| Total \$/kWh | 0.1069 | 0.1154 | 0.1273 | 0.1318 | 0.1275 | 0.1260 |

- Overall decrease in 2018 is due to a full year of Fair Hydro Plan implementation in 2018 versus partial year in 2017, offset by marginally higher load forecast

Other Revenues

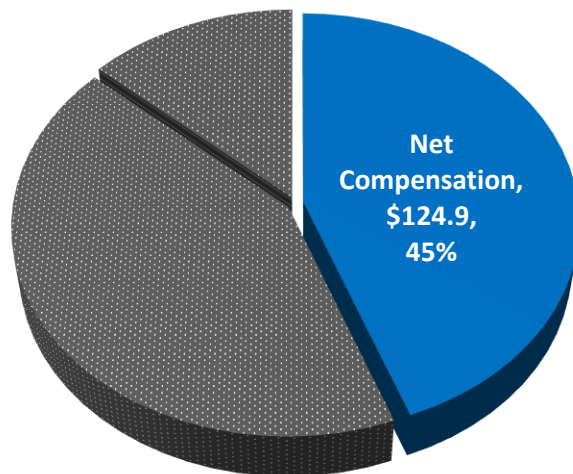
| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|--------------------------------------|----------------|----------------|------------------|----------------|---------------|
| Poles, Ducts and Other Rentals | 18.1 | 17.4 | 23.2 | 17.5 | (5.7) |
| Customer Demand Work | 10.7 | 12.1 | 14.4 | 13.3 | (1.1) |
| Reclaimed Materials | 3.3 | 2.3 | 3.2 | 2.9 | (0.3) |
| Street Lighting | 8.7 | 8.1 | 9.0 | 8.0 | (1.0) |
| Subtotal Customer Demand Work | 40.8 | 39.9 | 49.8 | 41.7 | (8.1) |
| Customer Charges | 11.8 | 11.8 | 11.8 | 11.8 | - |
| Late Payment Charges | 4.5 | 4.1 | 4.1 | 4.5 | 0.4 |
| Retailer Charges | 0.4 | 0.4 | 0.4 | 0.3 | (0.1) |
| Regulatory Deferral Accounts | 0.5 | 0.1 | 4.5 | 1.4 | (3.1) |
| Other | 4.7 | 4.0 | 10.0 | 5.9 | (4.1) |
| Total Monopoly | 62.7 | 60.3 | 80.6 | 65.6 | (15.0) |

Operating Expenses



| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|---------------------------------|----------------|----------------|------------------|----------------|------------|
| Net Compensation | 120.6 | 132.3 | 121.9 | 124.9 | 3.0 |
| External Costs | 105.9 | 108.0 | 109.0 | 117.7 | 8.7 |
| Business Support and Other | 39.8 | 36.7 | 43.0 | 36.4 | (6.6) |
| Total Operating Expenses | 266.3 | 277.0 | 273.9 | 279.0 | 5.1 |

Compensation



| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|-------------------------|----------------|----------------|------------------|----------------|------------|
| Payroll | 173.1 | 188.4 | 172.6 | 179.4 | 6.8 |
| Benefits | 47.2 | 53.2 | 48.3 | 52.5 | 4.2 |
| Capitalization | (99.7) | (109.3) | (99.0) | (107.0) | (8.0) |
| Net Compensation | 120.6 | 132.3 | 121.9 | 124.9 | 3.0 |

- 2018 Payroll budget reflects an overall average 3% salary increase for promotions, market and merit

External Costs

| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|---|----------------|----------------|------------------|----------------|------------|
| Maintenance of Facilities | 8.2 | 7.3 | 7.5 | 8.0 | 0.5 |
| IT External Consultants | 5.0 | 4.5 | 4.5 | 5.1 | 0.6 |
| IT Maintenance Contracts | 12.7 | 13.4 | 13.4 | 16.2 | 2.8 |
| Call Centre (Outsourced) | 5.0 | 4.1 | 4.9 | 5.3 | 0.4 |
| Tree Trimming | 3.8 | 3.1 | 3.1 | 3.0 | (0.1) |
| Meter Related Costs | 2.0 | 2.0 | 2.0 | 2.0 | - |
| Distribution System Maintenance and Materials | 46.3 | 46.0 | 51.5 | 52.0 | 0.5 |
| Professional Services | 8.5 | 8.4 | 6.6 | 7.6 | 1.0 |
| Administrative and General Expenses | 7.5 | 8.5 | 7.8 | 8.8 | 1.0 |
| Collections Services & Processing | 3.3 | 3.9 | 3.1 | 4.1 | 1.0 |
| Miscellaneous | 1.5 | 1.1 | 0.7 | 0.8 | 0.1 |
| Sub-total External Costs | 103.8 | 102.3 | 105.1 | 112.9 | 7.8 |
| Monthly Billing | 2.1 | 5.7 | 3.9 | 4.8 | 0.9 |
| Total External Costs | 105.9 | 108.0 | 109.0 | 117.7 | 8.7 |

Business Support and Other Costs

| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|---|----------------|----------------|------------------|----------------|--------------|
| Utilities and Communications | 5.7 | 7.4 | 7.2 | 7.4 | 0.2 |
| Office Supplies and Postage | 4.8 | 5.4 | 5.2 | 5.2 | - |
| Employee Expenses | 2.1 | 2.3 | 1.9 | 2.5 | 0.6 |
| Rental and Leases | 5.9 | 2.4 | 2.4 | 1.1 | (1.3) |
| Bad Debts | 3.5 | 7.0 | 5.2 | 6.8 | 1.6 |
| OEB Fees | 3.6 | 3.6 | 3.6 | 4.0 | 0.4 |
| Insurance | 3.3 | 3.4 | 3.1 | 3.3 | 0.2 |
| Property Taxes | 4.6 | 6.0 | 5.6 | 5.6 | - |
| Demand Billable Cost | 19.6 | 16.8 | 26.0 | 17.9 | (8.1) |
| Recoveries, Allocations and Other (incl.CDM recoveries) | (13.3) | (17.6) | (17.2) | (17.4) | (0.2) |
| Total Business Support Costs | 39.8 | 36.7 | 43.0 | 36.4 | (6.6) |

- Reduced lease costs due to move from 601 Milner to the owned 715 Milner
- Demand billable cost in 2017 includes higher pole rentals and inventory sale to third party contractor

Depreciation and Amortization

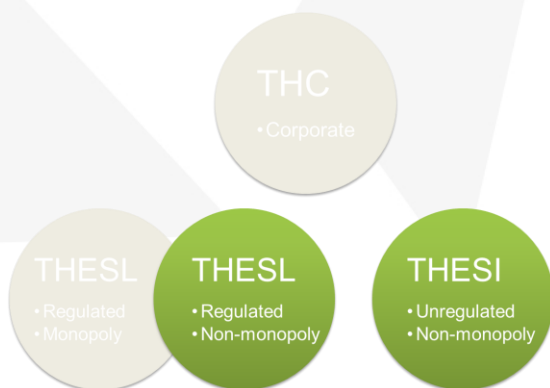
| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|---------------|----------------|----------------|------------------|----------------|----------|
| Regulated | 209.8 | 217.4 | 220.4 | 233.1 | (12.7) |

- Driven by higher investment in distribution infrastructure

Finance Costs

| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|---|----------------|----------------|------------------|----------------|------------|
| Interest on Long and Short Term Debt | 84.8 | 90.8 | 85.5 | 84.2 | (1.3) |
| Capitalized Interest | (12.6) | (9.5) | (9.9) | (6.0) | 3.9 |
| Interest on Regulatory Assets and Liabilities | (0.2) | 0.2 | (1.0) | (1.3) | (0.3) |
| Customer Deposits | 0.2 | 0.2 | 0.2 | 0.2 | - |
| Interest Income | (0.2) | (0.1) | (0.3) | (0.1) | 0.2 |
| Financing and Other Costs | 2.2 | 2.1 | 3.2 | 3.6 | 0.4 |
| Finance costs | 74.2 | 83.7 | 77.7 | 80.6 | 2.9 |

- 30-year debt issued November 14, 2017 for \$200M at 3.485%
- Plan assumes 10-year \$200M debt issuance July 2018 at 3.34%



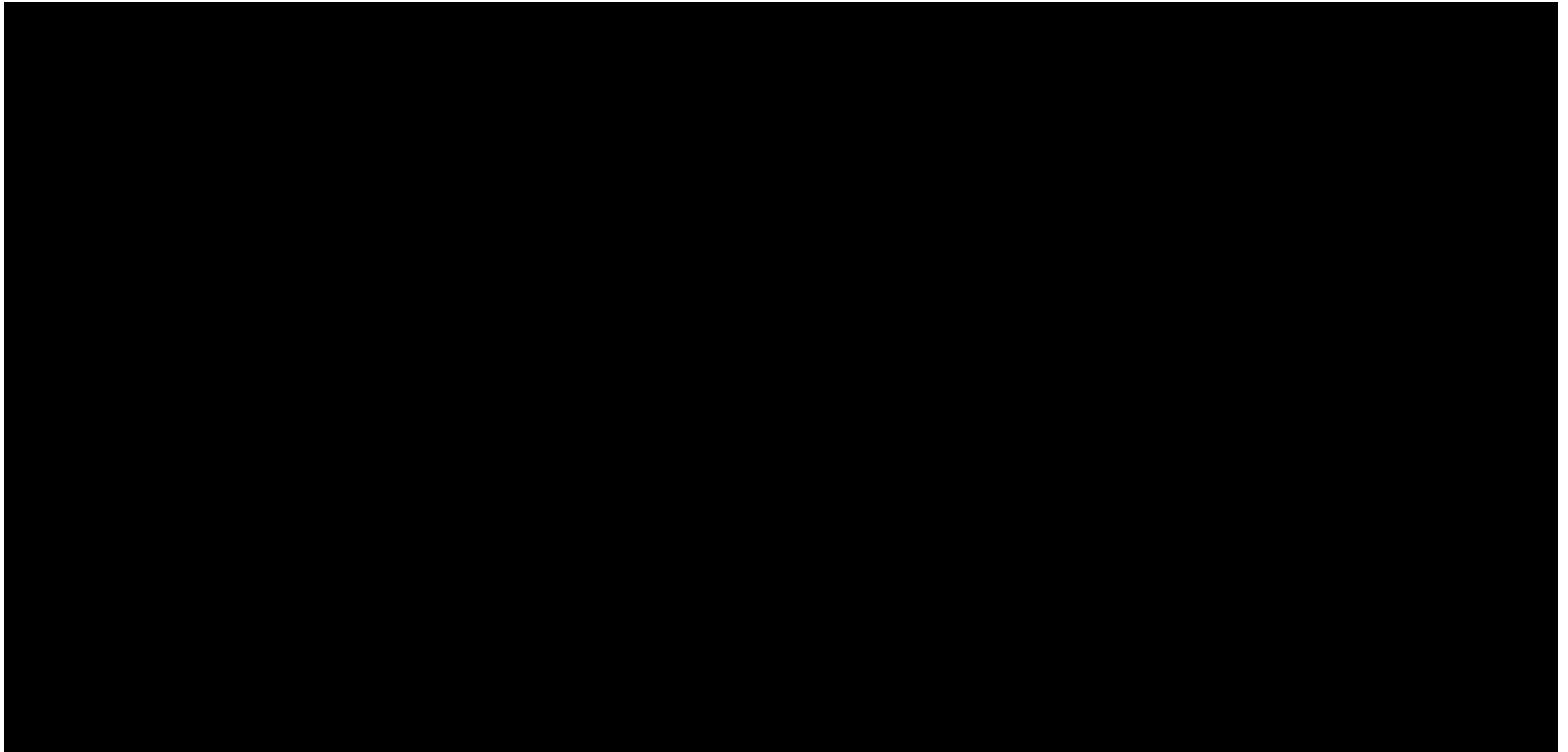
NEW BUSINESS DEVELOPMENT

Statement of Income

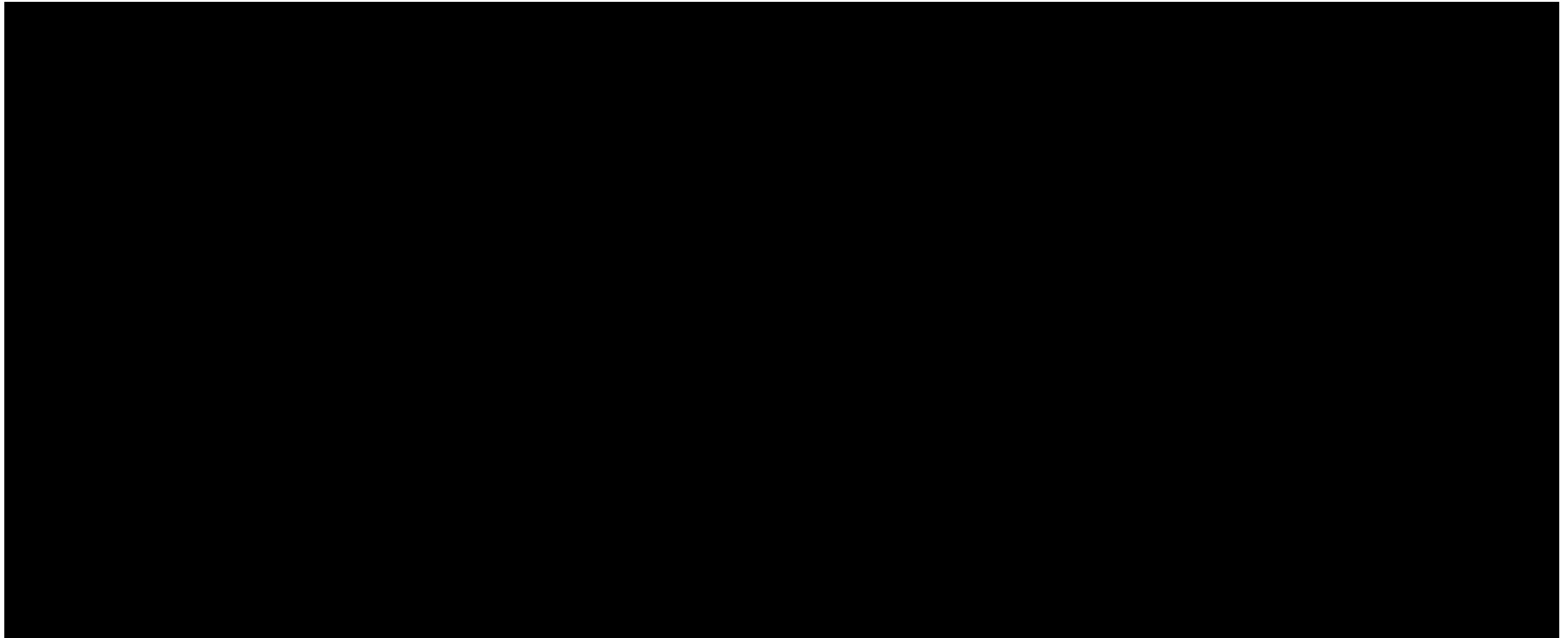
Revenues

Expenses

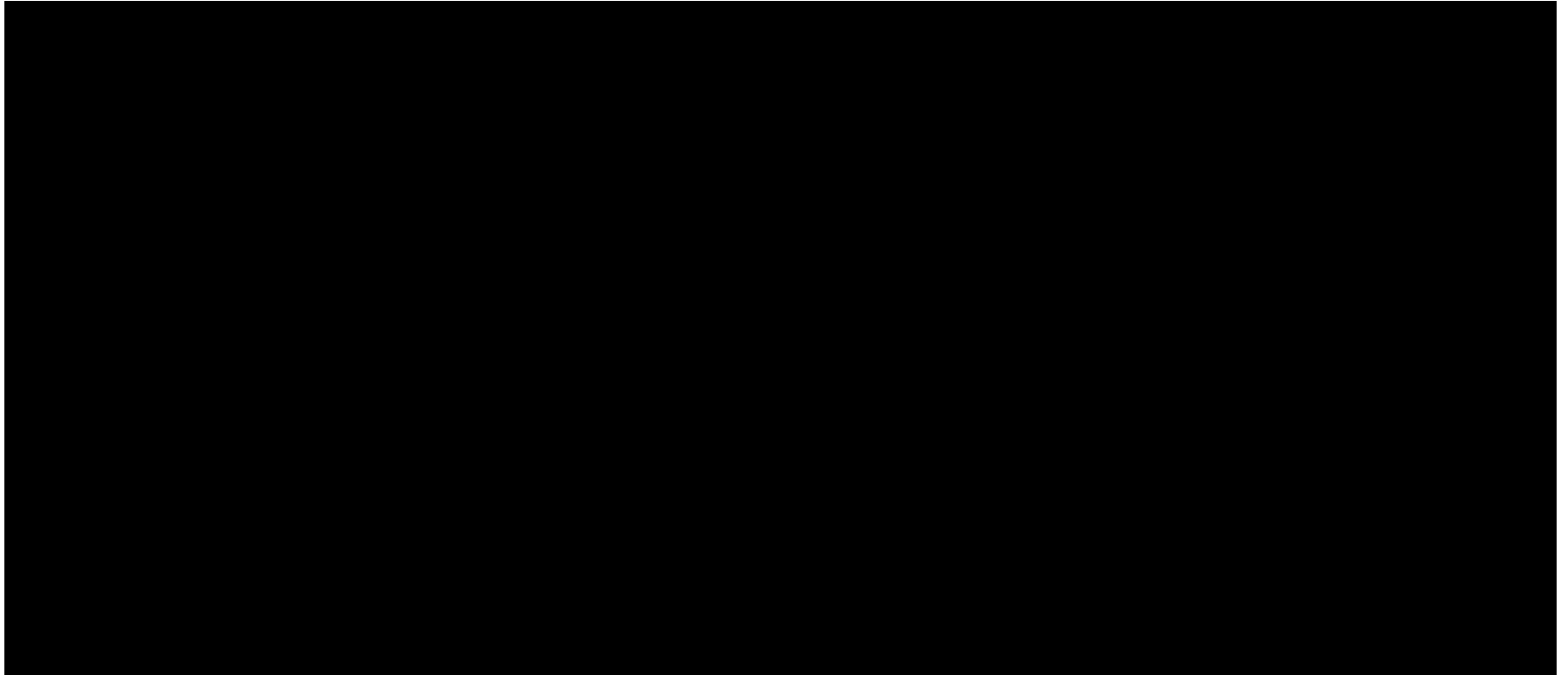
2018 Statement of Income Non-Monopoly



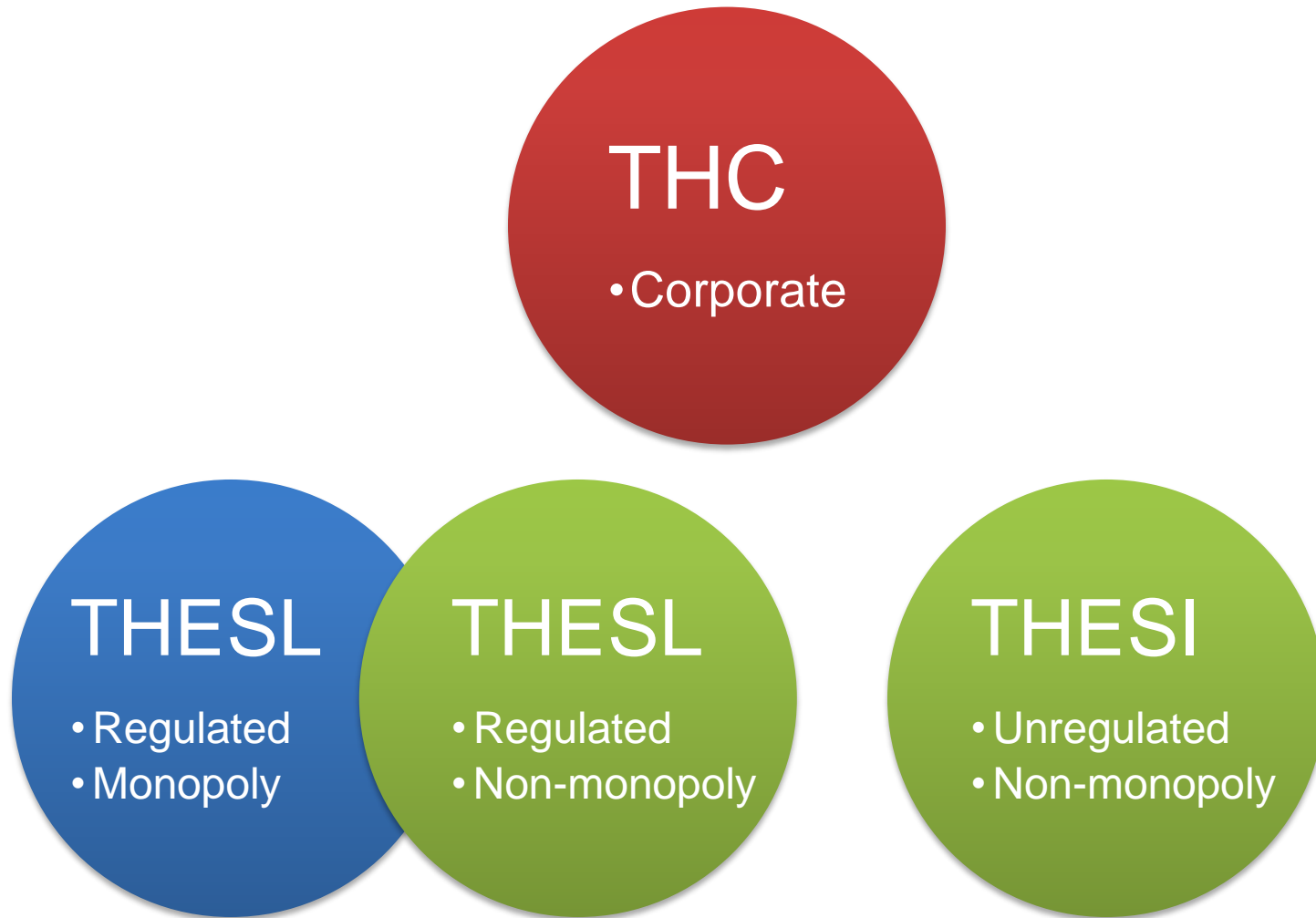
Other Revenues



Operating Expenses

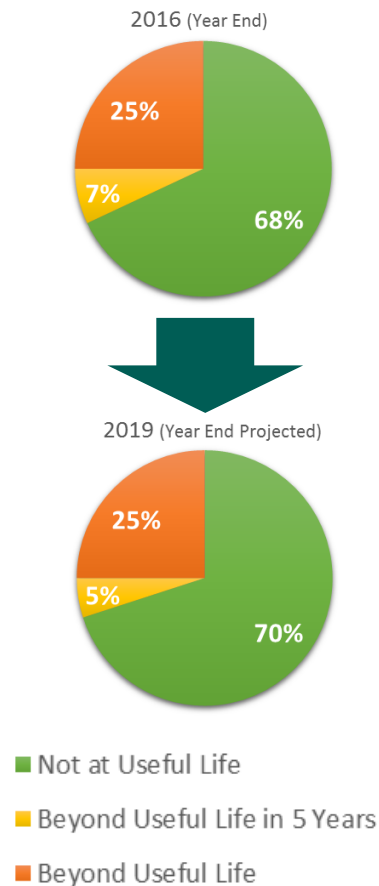


Consolidated Financials



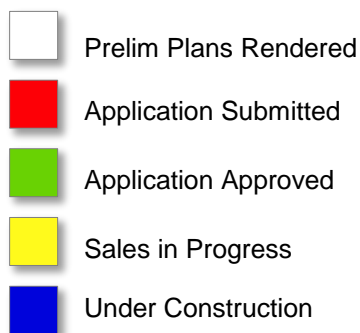
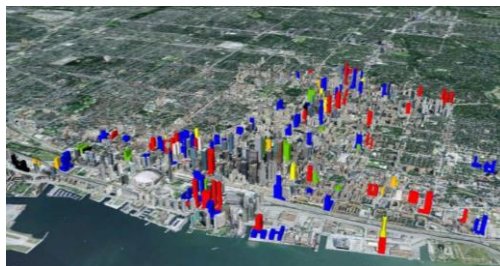
Capital Expenditure Drivers

AGING ASSETS



CITY GROWTH

- 129 new construction projects in Toronto (>100MW/year)
- 4,807 MW Peak Demand (2012)



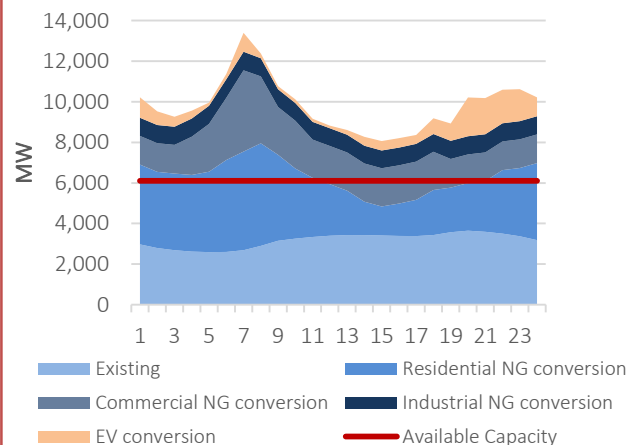
CLIMATE CHANGE ACTION PLAN

- In June 2016, Ontario released the Climate Change Action Plan, a 5-year spending plan of ~\$6 to \$8.3Bn on climate change initiatives

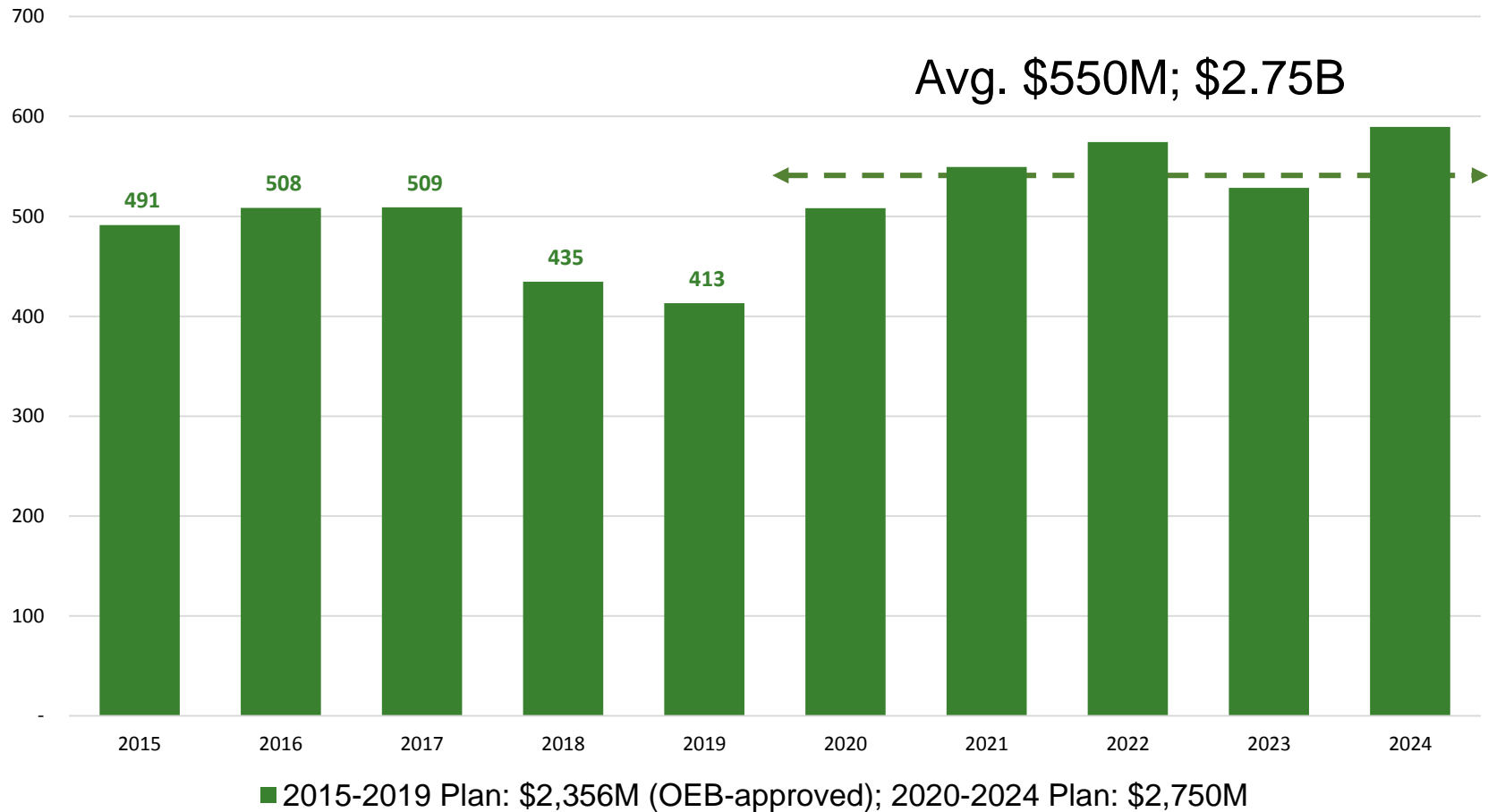
Impact of Electric Vehicles & Natural Gas Conversion

- Avoided annual GHG emissions* (NG + EV) - 13.6 Million tonnes of eCO₂
- Approximate cost to add required capacity - \$29Bn (\$2,122/tonne eCO₂)

Daily Winter Profile All Sectors & EVs

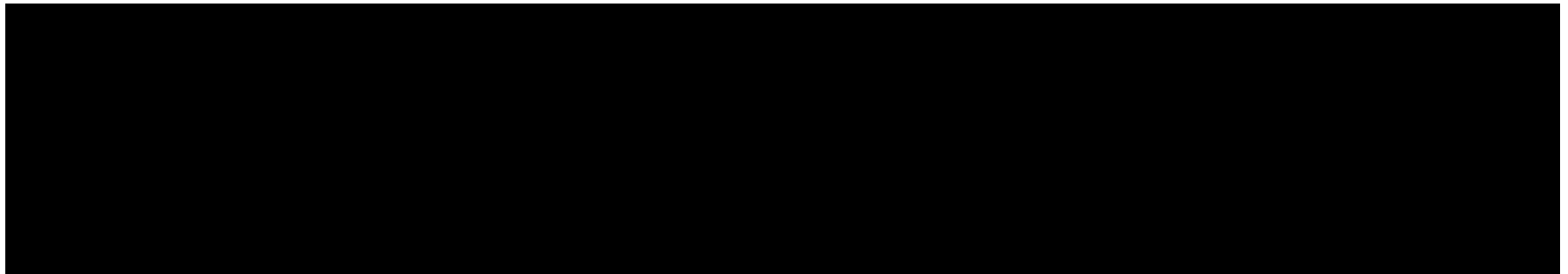


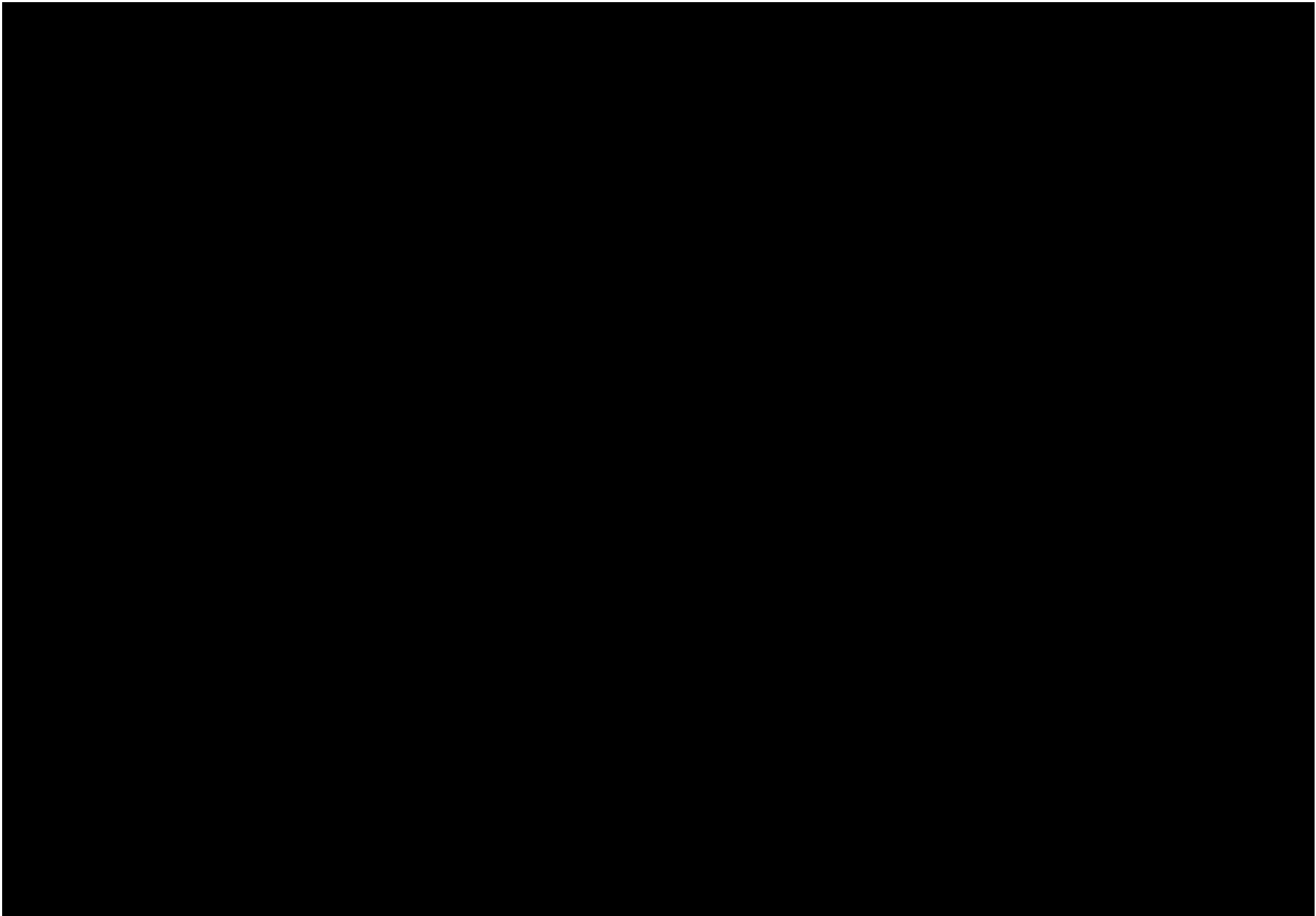
Regulated Capital Program

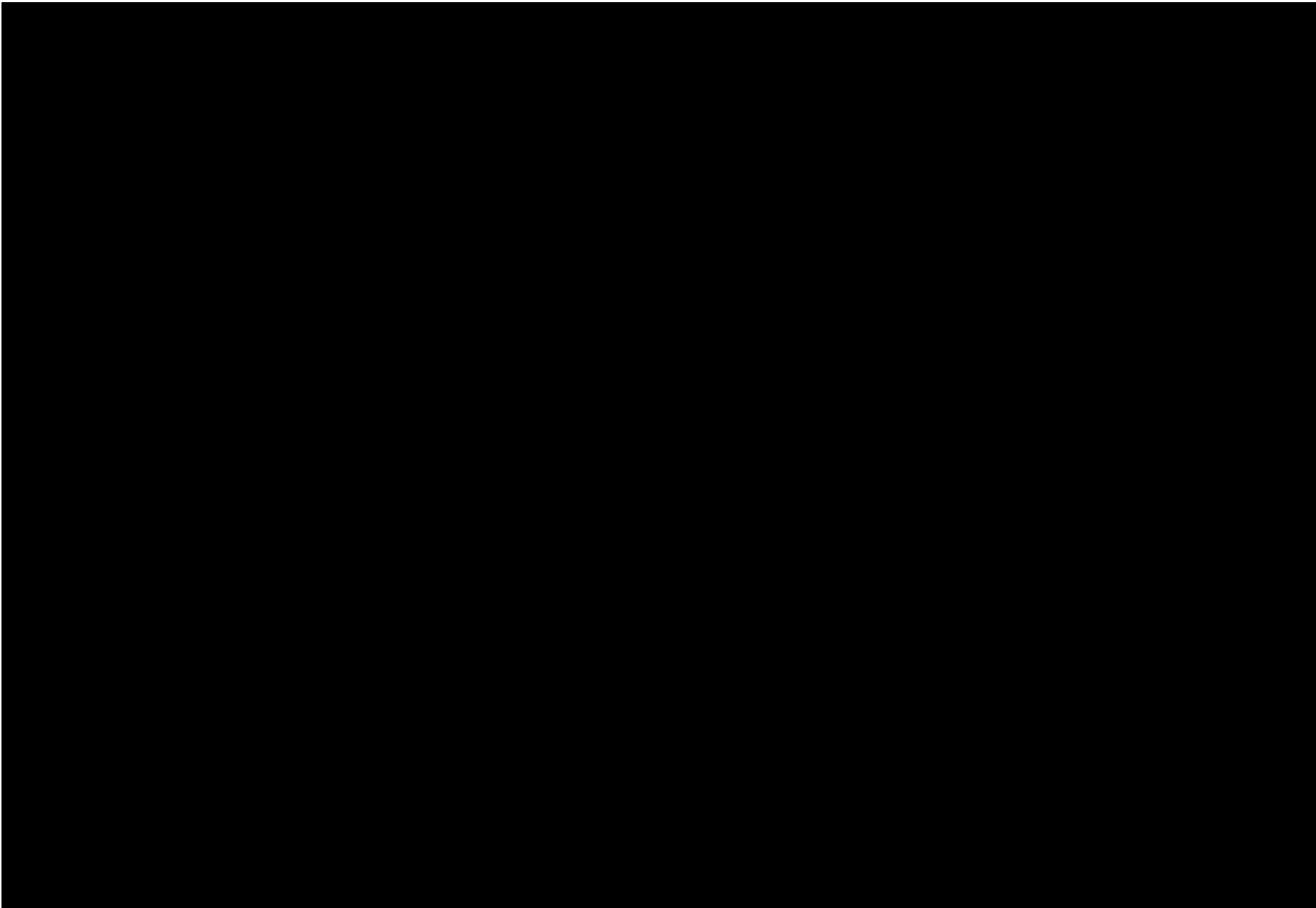


Capital Expenditures

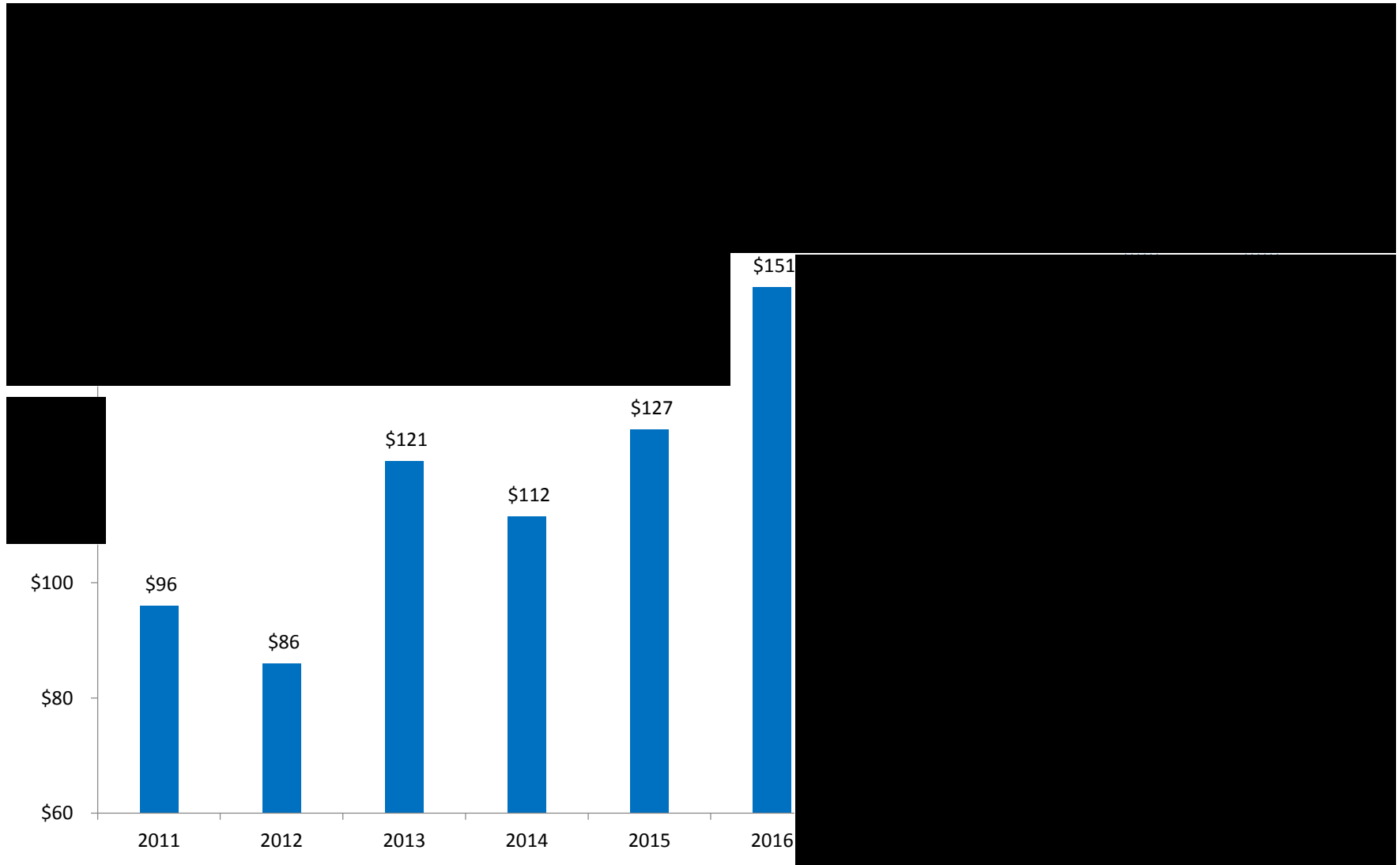
| (\$ Millions) | 2016 Actual | 2017 Budget | 2017 Forecast | 2018 Budget | Variance |
|--|----------------|----------------|------------------|----------------|---------------|
| Infrastructure Renewal | 290.2 | 283.0 | 308.0 | 319.2 | 11.2 |
| Reactive Capital | 47.6 | 35.6 | 37.1 | 35.5 | (1.6) |
| Customer Connections | 57.8 | 47.2 | 49.3 | 50.2 | 0.9 |
| HONI Contributions | 16.7 | 30.8 | 32.9 | 31.1 | (1.8) |
| Copeland TS | 22.6 | 23.6 | 21.1 | 5.0 | (16.1) |
| IT, Fleet and Facilities | 101.7 | 58.4 | 70.1 | 36.3 | (33.8) |
| ERP | 5.8 | 23.5 | 33.6 | 22.4 | (11.2) |
| Customer Contributions & Other Offsets | (34.0) | (17.0) | (43.0) | (65.1) | (22.1) |
| Monopoly Rate Base | 508.4 | 485.1 | 509.1 | 434.6 | (74.5) |
| Incremental External Demand Net CapEx | - | 18.3 | - | - | - |
| Provincial Allocations and Other | 3.8 | 7.6 | 5.1 | 13.1 | 8.0 |
| Monopoly Funded | 512.2 | 511.0 | 514.2 | 447.7 | (66.5) |







Cumulative Average Growth Rate



* 2011-2013 presented under US GAAP, 2014-2020 presented under IFRS

PRO FORMA STATEMENTS

Statements of Income

Balance Sheets

Cash Flows

Consolidated Statements of Income

| In millions of Canadian dollars For the years ended December 31 | Actual 2016 | Budget 2017 | Forecast 2017 | Plan 2018 | Plan 2019 | Plan 2020 |
|--|----------------|----------------|------------------|--------------|--------------|--------------|
| Revenues | | | | | | |
| Energy sales | 3,306 | 3,210 | 3,073 | 3,063 | 3,103 | 3,159 |
| Distribution revenue | 648 | 742 | 720 | 668 | 819 | 817 |
| Other revenues | 76 | 74 | ■ | ■ | ■ | ■ |
| | 4,030 | 4,026 | ■ | ■ | ■ | ■ |
| Expenses | | | | | | |
| Energy purchases | 3,217 | 3,271 | 3,086 | 3,063 | 3,103 | 3,159 |
| Operating expenses | 277 | 287 | ■ | ■ | ■ | ■ |
| Depreciation and amortization | 213 | 219 | ■ | ■ | ■ | ■ |
| | 3,707 | 3,777 | ■ | ■ | ■ | ■ |
| Finance costs | (74) | (84) | ■ | ■ | ■ | ■ |
| Gain on disposals of property, plant and equipment | 2 | 51 | 10 | 66 | - | - |
| Income before income taxes | 251 | 216 | ■ | ■ | ■ | ■ |
| Income tax expense | (67) | (42) | ■ | ■ | ■ | ■ |
| Net income | 184 | 174 | ■ | ■ | ■ | ■ |
| Net movement in regulatory balances | (77) | (35) | (47) | (17) | (55) | (18) |
| Net movement in regulatory balances arising from deferred tax assets | 44 | 6 | 21 | 30 | - | - |
| Net income after net movements in regulatory balances | 151 | 145 | ■ | ■ | ■ | ■ |

Consolidated Balance Sheets

| In millions of Canadian dollars As at December 31 | Actual 2016 | Budget 2017 | Forecast 2017 | Plan 2018 | Plan 2019 | Plan 2020 |
|---|----------------|----------------|------------------|--------------|--------------|--------------|
| ASSETS | | | | | | |
| Current | | | | | | |
| Accounts receivable, net of allowance for doubtful accounts | 229 | 249 | | | | |
| Unbilled revenue | 321 | 268 | | | | |
| Other assets | 23 | 16 | | | | |
| Total current assets | 573 | 533 | | | | |
| Property, plant and equipment and intangible assets | 4,125 | 4,446 | | | | |
| Deferred tax assets | 64 | 94 | | | | |
| Other assets | 1 | 7 | | | | |
| Total assets | 4,763 | 5,080 | | | | |
| Regulatory balances | 191 | 271 | 175 | 146 | 112 | 96 |
| Total assets and regulatory balances | 4,954 | 5,351 | | | | |
| LIABILITIES AND EQUITY | | | | | | |
| Current | | | | | | |
| Working capital facility & commercial paper | 268 | 348 | | | | |
| Debentures | 250 | - | | | | |
| Other liabilities | 565 | 553 | | | | |
| Total current liabilities | 1,083 | 901 | | | | |
| Debentures | 1,835 | 2,233 | | | | |
| Other liabilities | 438 | 488 | | | | |
| Total liabilities | 3,356 | 3,622 | | | | |
| Equity | | | | | | |
| Share capital | 568 | 568 | | | | |
| Retained Earnings | | | | | | |
| Retained earnings, beginning of year | 773 | 861 | | | | |
| Net income after net movements in regulatory balances | 151 | 145 | | | | |
| Other | - | - | | | | |
| Dividends | (63) | (25) | | | | |
| Retained Earnings, end of year | 861 | 981 | | | | |
| Total equity | 1,429 | 1,549 | | | | |
| Total liabilities and equity | 4,785 | 5,171 | | | | |
| Regulatory balances | 169 | 180 | 179 | 138 | 158 | 160 |
| Total liabilities, equity and regulatory balances | 4,954 | 5,351 | | | | |

Consolidated Statements of Cash Flows

| In millions of Canadian dollars For the years ended December 31 | Actual 2016 | Budget 2017 | Forecast 2017 | Plan 2018 | Plan 2019 | Plan 2020 |
|--|----------------|----------------|------------------|--------------|--------------|--------------|
| OPERATING ACTIVITIES | | | | | | |
| Net income after net movements in regulatory balances | 151 | 145 | ■ | ■ | ■ | ■ |
| Net movements in regulatory balances | 77 | 35 | 47 | 17 | 55 | 18 |
| Net movements in regulatory balances arising from deferred tax assets | (44) | (6) | (21) | (30) | - | - |
| Depreciation & amortization and other changes | 357 | 265 | ■ | ■ | ■ | ■ |
| Capital contributions received | 45 | 41 | 43 | 65 | 43 | 72 |
| Changes in other non-cash working capital balances | (15) | (12) | ■ | ■ | ■ | ■ |
| Net cash provided by operating activities | 571 | 468 | ■ | ■ | ■ | ■ |
| INVESTING ACTIVITIES | | | | | | |
| Purchase of property, plant and equipment & Intangibles | (552) | (561) | ■ | ■ | ■ | ■ |
| Proceeds on disposals of property, plant and equipment | 2 | 60 | 10 | 75 | - | - |
| Net cash used in investing activities | (550) | (501) | ■ | ■ | ■ | ■ |
| FINANCING ACTIVITIES | | | | | | |
| Increase (decrease) in commercial paper | (63) | 4 | ■ | ■ | ■ | ■ |
| Common shares issued | - | - | ■ | ■ | ■ | ■ |
| Dividends paid | (63) | (25) | ■ | ■ | ■ | ■ |
| Proceeds from debentures net of debt issuance costs | 199 | 398 | ■ | ■ | ■ | ■ |
| Repayment of debentures | - | (250) | ■ | ■ | ■ | ■ |
| Repayment of finance lease liability | (3) | (3) | ■ | ■ | ■ | ■ |
| Interest paid | (84) | (91) | ■ | ■ | ■ | ■ |
| Net cash provided by (used in) financing activities | (14) | 33 | ■ | ■ | ■ | ■ |
| Net decrease (increase) in working capital facility during the year | 7 | - | ■ | ■ | ■ | ■ |
| Working capital facility, beginning of year | (14) | - | ■ | ■ | ■ | ■ |
| Working capital facility, end of year | (7) | - | ■ | ■ | ■ | ■ |

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

INTERROGATORY 2:

Reference(s): Exhibit 1A

Please provide all correspondence between THESL and the City of Toronto regarding this Application. Did the City of Toronto specifically approve the Application and the resulting rates? If not, why not?

RESPONSE:

Enclosed as Appendix A to this response is a copy of the letter that Toronto Hydro sent to the City of Toronto, as a customer, advising of the proposed rates and charges for the unmetered and street lighting customer classes.

Toronto Hydro declines to produce any other documents on the basis of relevance. The correspondence between Toronto Hydro and the City of Toronto formed no part of this application and has no probative value in deciding the issues in this proceeding. Different operational areas of Toronto Hydro communicate regularly with the City of Toronto on a wide range of subjects. It would be a significant effort to sort through all this correspondence to determine which materials contained information regarding the Application.

The City of Toronto did not approve the Application because rate applications are operational activities that the City, as shareholder, has not reserved for itself under the Shareholder Direction. As noted in the response to interrogatory 1A-CCC-1, the Board of

- 1 Directors approved the Business Plan that underlies this application, and a copy of the
- 2 Business Plan is filed as an Appendix to that response.

Andrew J. Sasso
Director, Regulatory Affairs
Toronto Hydro-Electric System Limited
14 Carlton Street
Toronto, ON M5B 1K5

Telephone: 416.542.7834
Facsimile: 416.542.3024
regulatoryaffairs@torontohydro.com
www.torontohydro.com



Toronto Hydro-Electric System Limited
EB-2018-0165
Interrogatory Responses
1A-CCC-2
Appendix A
FILED: January 21, 2019

August 17, 2018

Re: Toronto Hydro-Electric System Limited ("Toronto Hydro")
Custom Incentive Rate-setting ("Custom IR") Application for 2020-2024 Electricity
Distribution Rates and Charges – Notice to Unmetered Customers
OEB File No. EB-2018-0165

This letter is to advise you that Toronto Hydro-Electric System Limited ("Toronto Hydro") is proposing changes to rates and charges for its unmetered and street lighting customer classes as part of its 2020 to 2024 rate application, submitted to the Ontario Energy Board ("OEB"). As you are a major customer in these classes, these changes may be of interest to you.

You may view the application and related documents on Toronto Hydro's website:
<http://www.torontohydro.com/sites/electricsystem/Pages/RegulatoryAffairs.aspx>.

For your ease of reference, the following sections of the application may be of particular interest to you, however we encourage you to review the application more broadly.

- Exhibit 1B: Executive Summary, Application Summary
- Exhibit 3: Load and Customer Forecasts
- Exhibit 7: Cost Allocation
- Exhibit 8: Rate Design & Bill Impacts

In the coming months, the OEB will provide an opportunity for interested parties to become intervenors in the rate proceeding. We will work with the OEB to ensure that you receive notice of this intervention process (either from the OEB or us).

In the interim, we are pleased to meet and discuss any aspects of our application which may be of interest to you, and I invite you to contact me directly to set up a conversation.

Yours truly,

Andrew J. Sasso
Director, Regulatory Affairs
Toronto Hydro-Electric System Limited
regulatoryaffairs@torontohydro.com

cc: Amanda Klein, Toronto Hydro

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

INTERROGATORY 3:

Reference(s): Exhibit 1A

The Council assumes that THESL will be filing an update to the evidence to reflect 2018 actuals. What will be the scope of that update and when will it be filed?

RESPONSE:

Pursuant to Procedural Order 2, Toronto Hydro expects to advise on the timing of the update by February 13, 2019. The planned updates to evidence are set out in Exhibit 1A, Tab 3, Schedule 1, Appendix B. Please also refer to Toronto Hydro's response to interrogatory 1A-Staff-1.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

INTERROGATORY 4:

Reference(s): Exhibit 1A

Is THESL planning any mergers or acquisitions during the rate plan period. If so, please provide details.

RESPONSE:

Any utility mergers or acquisitions during the rate plan period would be disclosed, and, if necessary, related approvals would be sought, in accordance with requirements under the *Ontario Energy Board Act*¹ and the *Securities Act*.²

¹ Ontario Energy Board Act, 1998, SO 1998, c 15, Sched. B.

² Securities Act, RSO, 1990, c S 5.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

INTERROGATORY 5:

Reference(s): Exhibit 1A, Tab 3, Schedule 1, p. 4

Please recast Table 1 excluding rate riders.

RESPONSE:

Please find below an updated “Summary of Bill impacts (Distribution Only)” with excluded Rate Riders.

Table 1: Summary of Bill impacts (Distribution Only) – Excluding Rate Riders

| Residential (750 kWh) | | | | | | |
|-----------------------|------|------|------|------|------|---------|
| Distribution Bill | 2020 | 2021 | 2022 | 2023 | 2024 | Average |
| Subtotal A \$ | 0.54 | 1.37 | 1.07 | 1.89 | 1.83 | 1.34 |
| Subtotal A % | 1.3 | 3.3 | 2.5 | 4.2 | 3.9 | 3.0 |
| GS < 50 kW (2000 kWh) | | | | | | |
| Distribution Bill | 2020 | 2021 | 2022 | 2023 | 2024 | Average |
| Subtotal A \$ | 3.67 | 3.45 | 2.68 | 4.74 | 4.59 | 3.83 |
| Subtotal A % | 3.6 | 3.3 | 2.5 | 4.2 | 3.9 | 3.5 |

1 RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

2
3 INTERROGATORY 6:

4 Reference(s): Exhibit 1A, Tab 3, Schedule 1, p. 7

5
6 Please specifically identify any changes to THESL's Conditions of Service from the last
7 Application. Please provide the rationale for any changes.

8
9 RESPONSE:

10 Please find attached the following summaries of changes that have been made to the
11 Toronto Hydro's Conditions of Service since the utility's last rebasing application (EB-
12 2014-0116):

- 13 • Appendix A – Revision Summary 14, effective March 2, 2015;
14 • Appendix B – Revision Summary 15, effective March 7, 2016;
15 • Appendix C – Revision Summary 16, effective February 15, 2017;
16 • Appendix D – Revision Summary 17, effective January 1, 2018; and
17 • Appendix E – Revision Summary 18, effective January 1, 2019.

18
19 In addition to the changes summarized in the appendices, on December 24, 2018,
20 Toronto Hydro posted for public comment Revision Summary 18.1, which includes a
21 proposed change to section 1.7.5 of its Conditions of Service.¹

¹ The proposed change is: For Customer-Owned vaults that contain Toronto Hydro equipment, Customers requiring vault access shall pay a fair and reasonable charge based on cost recovery principles for a Toronto Hydro Person-in-Attendance. Where a Customer requires vault access solely for the purpose of completing any fire equipment inspections required by applicable law, Toronto Hydro will provide one Person-in-Attendance for a maximum of two hours once every 12 months at no charge to the Customer. If the Customer is not present at the scheduled time, Toronto Hydro shall charge the Customer for the attendance by the Person-in-Attendance.

APPENDIX A

| <p>CONDITIONS OF SERVICE Revision #14 <u>REVISION SUMMARY</u></p> | | |
|---|--|--|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| 1.7.1 | Access to Customer Property | Added statements to clarify the conditions to when Toronto Hydro may have access to Customer property to service its equipment. |
| 2.2.1 | Disconnection & Reconnection – Process and Charges | Revised to clarify the fee referred in Table 2 is for a connection termination. Added a statement that service charges will be applied and are presented on Toronto Hydro's website, when a Customer requests a disconnection/reconnection of its supply for electricity. |
| 2.3.4.3 | Multiple Connections to Main Distribution System | Revised to indicate the service depicted in Sketch 1(H1) resides in Reference #4 "Toronto Hydro Requirements for the Design and Construction of Customer-Owned High Voltage Substations". |
| 2.3.6 | Emergency Backup Generation Facilities | Added statements to indicate the requirements and conditions to install a "meter base plug-in transfer device" that is attached to the revenue meter. |
| 2.3.7 | Metering | Added a statement to indicate metering installations shall further meet the requirements and conditions as specified in Reference #6 "Toronto Hydro Metering Requirements 750 Volts or Less", and Reference #7 "Toronto Hydro Metering Requirements for 13.8 kV & 27.6 kV Customer-Owned Substations". |
| 2.3.7.1 | General | Added statements to indicate the clearance distance between a meter socket and the discharge of a combustible gas relief device or vent. |
| 2.3.7.3 | Interval Metering | Revised to indicate interval meters will be installed for Customers that have a peak demand of 50 kW or greater. |

CONDITIONS OF SERVICE

Revision #14

REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|--------------------|---|---|
| | | <p>Added a statement to indicate for locations that are selected for cellular communication, the Customer shall supply and install conduit.</p> <p>Deleted the paragraph that stated other Customers that request interval metering shall pay for all incremental costs.</p> |
| 3.8 | Unmetered Connections | <p>Added a statement to indicate processes associated with unmetered connections are described in Tables 9.1 to 9.4.</p> <p>Added statements to indicate for unmetered Customers loading information is required to contribute in establishing rates to be applied. These unmetered Customers will be notified of any potential cost changes.</p> |
| Section 5 - Tables | Tables 1.1, 1.2, 1.3, and 1.4 Demarcation Points & Charges for Connection Assets and Disconnection | Revised the column heading from "Service Disconnection" to "Connection Termination" in all Tables. |
| Section 5 - Tables | Table 2 Service Connection and Disconnection Fee | <p>Revised the column heading from "Service Disconnection" to "Connection Termination".</p> <p>Revised the connection termination charge from a "fixed" charge to a "variable" charge for Class 3A Customers.</p> |
| Section 5 - Tables | Table 9.1 Unmetered Scatter Load Process Map: Customer Connection / Transfer / Disconnection / Removal Services | Added a new Table that shows a process map of the steps involved for unmetered service connections, transfers, disconnections, and removals. |
| Section 5 - Tables | Table 9.2 Toronto Hydro / Customer Interactions for Table 9.1 Process Map: Customer Connection/Transfer/Disconnec tion/Removal Services | Added a new Table that describes the process steps involved for unmetered service connections, transfers, disconnections, and removals. |

| <p style="text-align: center;">CONDITIONS OF SERVICE Revision #14 <u>REVISION SUMMARY</u></p> | | |
|---|---|---|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| Section 5 - Tables | Table 9.3 Unmetered Scatter Load Process Map: Existing Customer Service Updates and Validation | Added a new Table that shows a process map of the steps involved to update and validate unmetered service connections. |
| Section 5 - Tables | Table 9.4 Toronto Hydro / Customer Interactions for Table 9.3 Process Map: Existing Customer Service Updates and Validation | Added a new Table that describes the process steps involved to update and validate unmetered service connections. |
| Section 6 – References | Toronto Hydro Distributed Generation Requirements | <p>Updated reference document #3 (Revision #4, dated October 23, 2014).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 2.6.1 Emergency Backup Generation; installation of a meter base plug-in transfer device, - 3.2 Emergency Backup Generation Technical Requirements; installation of a meter base plug-in transfer device. <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 2.7 Distributed Generation connections and Metering; metering practices for generators ≥ 500 kVA, - 6.4, Appendix 4(ii) Standard for Net Metering – Residential Services; updated standard 17-9500, - 6.4, Appendix 4(iii) Standards for MicroFIT Program Residential Service; updated standards 17-9610 and 17-9710, - 6.4, Appendix 4(viii) Distributed Generation Monitoring and Control Requirements; updated throughout. <p>Deleted content to the following sections:</p> |

CONDITIONS OF SERVICE

Revision #14

REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------------|--|---|
| | | <ul style="list-style-type: none"> - 6.3, Appendix 3, forms removed and are now made available on Toronto Hydro's website: <ul style="list-style-type: none"> - Embedded Generation Connection Application Form, - Connection Impact Assessment Generator Form, - MicroFIT Connection Application Guidelines and Form, - FIT Connection Application Guidelines, - Net Metering Connection Application Guidelines. - 6.4, Appendix 4(iii), Standards for MicroFIT Program Residential Service; removed standard 17-9660, - 6.4, Appendix 4(viii), Distributed Generation Monitoring and Control Requirements; removed the FIT Monitoring and Control Requirements document. |
| Section 6 – References | Toronto Hydro Metering Requirements 750 Volts or Less | <p>Updated reference document #6 (Revision #8, dated October 7, 2014).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 5.2 Legislation and Specified Requirements; Ontario Regulation 851, - 7.1.2 Customer's Instrumentation; installation of a meter base plug-in transfer device, - 7.3 Table I; enclosure cannot contain other auxiliary devices, - 7.14 Remote Metering (RIMS) – Services 50 kW and Greater; new bullet (e), - Appendix, Diagram #4; second TSU13. |
| Section 6 – | Toronto Hydro Metering Requirements 750 Volts or Less (cont'd) | <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 3.1.1 Definitions; Meter-Mounting Devices, |

CONDITIONS OF SERVICE

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REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------|--|---|
| References | | <ul style="list-style-type: none"> - 4.3.1 Meter Installation and Meter Disconnection; conditions to install and remove meters, - 5.5 Fire Pump Services; condition to use only a meter cabinet, - 7.14 Remote Metering (RIMS) – Services 50 kW and Greater; “200 kV” to “50 kV”, - 8.1 Standard Metering Configuration; title change, - Appendices: Diagram #'s 1, 2, and 5; updated connection layout, contact information, and title. <p>Deleted content to the following sections:</p> <ul style="list-style-type: none"> - 1.2 Ontario Electrical Safety Code; statement referencing rules and diagrams from the code, - 3.3 The International System of Units; statement that equivalent substitution shall have prior approval. |
| Section 6 - References | Toronto Hydro Metering Requirements for 13.8 kV & 27.6 kV Customer-Owned Substations | <p>Updated reference document #7 (Revision #5, dated October 7, 2014).</p> <p>Added statement to section 10.5 Remote Metering (RIMS) – Services 50 kW and Greater; new bullet (e).</p> <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 10.4.3 Metering Conduit; replaced “LBs” with “fittings with removable covers”, - 10.5 Remote Metering (RIMS) – Services 50 kW and Greater; updated title. <p>Deleted content to following sections:</p> <ul style="list-style-type: none"> - 1.2 Ontario Electrical Safety Code; statement referencing rules and diagrams from the code, |

CONDITIONS OF SERVICE

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REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------|--|--|
| | | <ul style="list-style-type: none"> - 10.5 Remote Metering (RIMS) – Services 50 kW and Greater; removed words “punched board” in bullet (a). |
| Section 6 - References | Contractor Pre-Qualification Application | <p>Updated reference document #8 (Version 2.2, dated October 28, 2014).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - Introduction (1) (i); defined Qualified Contractor, - Qualification (2)(i)(k); request for declaration of any criminal charges or convictions, - (10) No Liability; as it applies to Toronto Hydro, - Initial Contractor Pre-Qualification Certificate (2a); defined Applicable Laws. <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - Subcontractors (3)(i); Qualified Contractors are responsible for their sub-contractors, - Initial Contractor Pre-Qualification Certificate, bullet 8; requirements for sub-contractors, - Section One: Project Categories; updated table throughout, - Section Seven: Minimum Employee Training REQs; table reflects qualifications relative to project categories. <p>Deleted content to the following sections:</p> <ul style="list-style-type: none"> - Qualification (2)(i), (2)(i)(e), (2)(i)(f), and (2)(iv); removed words, - Selection of Contractors (9)(i); reference to competitive bids, - (12) Enquiries; contact person. |

APPENDIX B

| <p>CONDITIONS OF SERVICE Revision #15 <u>REVISION SUMMARY</u></p> | | |
|---|--|--|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| 1.1.1 | Distribution Overview | Added statement which reserves the right for Toronto Hydro to select the Customer's type of supply connection. |
| 2.2 | Disconnection | Added additional conditions where Toronto Hydro may disconnect the supply of electricity without notice to its Customers. |
| 2.4.3 | Deposits | Added statement that Toronto Hydro will not waive a security deposit irrespective of common ownership or affiliation. |
| 2.4.4 | Billing | Revised the frequency which Toronto Hydro renders electricity bills to its Customers. Added statement which describes how electricity bills are determined if no metered consumption data is available. |
| 3.1.1.1 | Minimum Requirements | Revised the horizontal clearance requirements such that a person cannot reach out and touch service conductors. Added a minimum vertical clearance requirement for service conductors passing over a readily accessible surface. |
| 4 | Glossary of Terms | Revised the term "eligible low-income customer" defined as a residential Customer who is approved for the Ontario Electricity Support Program or the Low-Income Energy Assistance Program. |
| Section 6 – References | Toronto Hydro Distributed Generation Requirements | <p>Updated reference document #3 (Revision #5, dated November 30, 2015).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 2.7 Distributed Generation Connections and Metering; added metering option (c), - 2.9 Warning Signs and Labels; requirement for posting warning signs and labels. <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - The Ontario Power Authority (OPA), merged with the Independent Electricity System Operator on January 1, 2015, into a new organization that |

CONDITIONS OF SERVICE

Revision #15

REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------|---|--|
| | | <p>carries the name Independent Electricity System Operator (IESO). The Distributed Generation Requirements document was updated to reflect the new organization name,</p> <ul style="list-style-type: none"> - The Demand Response 3 (DR3) program is no longer active and has been replaced by the Demand Response (DR) program. The Distributed Generation Requirements document was updated to reflect the new program name, - 4.3.3 Connection Agreement; added Schedules B1 and B2 in addition to B3 as binding agreements where no connection agreements exists, - Appendix 2 (i) - Schedule B1: Micro-Embedded Generation Facility Connection Agreement; updated content in sections Technical Requirements, and Compensation and Billing, - Appendix 4 (vii) - Distribution Availability Test (DAT) Information; reformatted the Distribution Availability Test document. |
| Section 6 - References | Toronto Hydro Requirements for the Design and Construction of Customer-Owned High Voltage Substations | <p>Updated reference document #4 (Revision #7, dated November 30, 2015).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 7.7 Exceptions to Requirements; new section describing requirements for reporting non-compliances, - 8.4 (c) Cable Racks and Conduits; requirements for guarding the medium voltage cables, - 9.18.3 Cable Compartment; requirements for a portable platform, - 9.20 Emergency Backup and Embedded Generation; made reference to Toronto Hydro Distributed Generation Requirements document, - 9.25 Faulted Circuit Indicators; new section describing requirements for faulted circuit indicators, - 11 Associated Publications; added C37.20.2, |

CONDITIONS OF SERVICE

Revision #15

REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------|---|---|
| | | <ul style="list-style-type: none"> - Sketches: 1(B-1), 1(C-1), 1(C-2), 1(D-1), 1(E-1), 1(E-2), 1(F1), 1(F-2), 1(G-1), 1(H-1), 1(H-2), 1(I-1), and 5; added faulted circuit indicator, - Sketch 1 (J-1); added faulted circuit indicator and note 6, - Sketch 1 (J-2); added faulted circuit indicator and note 8, - Sketch 1 (J-3); added faulted circuit indicator, and revised note 6, - Sketch 2; added note 3, - Sketch 6; added openings to the platform, and notes 5 & 6. <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 8.2.1 Exits and Doors; direction of door opening and door hardware, - 8.2.2 (h) Legislation and Specific Requirements; updated the hourly fire rating for the door, - 9.3.3 Intercompartmental Primary Connections; requirement for non-magnetic intercompartmental barriers, - 9.6 Viewing Windows; function and construction of viewing windows, - Table 5; note 2 specifying SCADA types. <p>Deleted content to following sections:</p> <ul style="list-style-type: none"> - 9.20.1 Emergency Backup Generation; deleted, - 9.20.2 Embedded Generation; deleted. |
| Section 6 - References | Toronto Hydro Requirements for the Design and Construction of | <p>Updated reference document #5 (Revision #3, dated November 30, 2015).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 2.3.7 Pole; defined the word "pole", - 3.3 Toronto Hydro Standards; added standards 31-6020, 31-6030, 31-6035, 31-6040, 31-6050, 31-6060, 31-6070, and 31-6080, |

CONDITIONS OF SERVICE

Revision #15

REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|--|---|---|
| Section 6 – References continued from above | Customer-Owned Structures | <ul style="list-style-type: none"> - 4.4.3.4.3; procurement of precast padmounts by the Customer, - 8.7; requirement to waterproof vaults, - 10.3; for existing vaults rebuild the electrical system as needed. <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 1.1; added “pole” in the listing of Customer-owned structures, - 4.1.3; requirement for a written agreement or drawing that specifies ownership, - 4.2.1; digital file or hard copy submissions, - 4.2.3; reason for drawing review, - 4.2.4; requirement to re-submit revised drawings, - 4.2.5.; requirement to submit applicable information, - 4.4.1.2; discussion on placement of proposed structure; - 4.4.1.8; where patios cannot be placed, - 4.4.3.1.1, 4.4.3.4.1, and 4.4.3.6.2; removed standard numbers, and made reference to section 3.3, - 4.4.3.1.2; updated the standard number, - 4.4.3.1.16; removed standards 31-2180, 31-8260 and 31-8270, - 4.4.3.3.5; approved Toronto Hydro contractors can seal ducts, - 4.4.3.5.2; removed standard number 31-6010 and instead refer to section 5.1 of this document, - 4.4.3.6; updated title, - 4.6.1; requirements for Customer's Engineer presence and sign-off, - 5.1, 6.1, and 7.1; removed standard number 31-6000, - 6.2; requirements for vaults not to be installed near public living areas, and for extra insulation products, - 7.2; vehicles cannot be parked in front of above-grade vault doors, |
| | Toronto Hydro Requirements for the Design and Construction of Customer-Owned Structures continued from above | |

CONDITIONS OF SERVICE

Revision #15

REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|---------------------------|---|--|
| | | <ul style="list-style-type: none"> - 7.3; where patios are not allowed to be placed, - 8.5; requirement for Toronto Hydro approval , - 9.1; reference made to the Ontario Electrical Safety Code, - 10.2; electrical devices required for a new vault, - 10.5; removed light bulbs wattage number, - 10.6; requirement for exterior lighting, - 12.1; reference made to the Ontario Building Code, and Ontario Fire Code, - 12.3; detectors shall meet code requirements, - 13.4; requirement for an oil containment system, - Standard 31-6020 rev. 8, added "heat" to smoke detector in plan and revised note 1, - Standard 31-6030 rev 9, page 3: added "x" column to the table and revised note 1, - Standard 31-6035 rev. 2, added "heat" to smoke detector in plan and revised note 1. <p>Deleted standards in section 3.3; 18-5400, 31-2130, 31-2180, 31-2210, 31-4015, 31-4070, 31-8200, 31-8220, 31-8230, 31-8250, 31-8260, 31-8270, and 31-8400.</p> |
| Section 6 - References | Toronto Hydro Metering Requirements 750 Volts or Less | <p>Updated reference document #6 (Revision #9, dated October 9, 2015).</p> <p>Revised the main switchboard schematic in Diagram #5 to indicate "Guest or Super Suite Meters".</p> <p>Deleted the crew leader contact information from Diagram #2.</p> |

APPENDIX C

| <p style="text-align: center;">CONDITIONS OF SERVICE Revision #16 <u>REVISION SUMMARY</u></p> | | |
|---|--|---|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| 1.1.1 | Distribution Overview | Added the 347/600 voltage as a secondary network source of supply. |
| 1.7.3 | Tree and Vegetation Management | Revised the condition to when to charge a customer that requires a disconnection of their overhead lines. |
| 1.7.5 | Customer-Owned Equipment, Infrastructure, and Property | Added a statement that Toronto Hydro will provide a customer with one vault access at no charge. |
| 2.1.2.3 | Expansion Deposit | Revised the expansion deposit amount. |
| 2.1.5 | Relocation of Plant | Added the requirements that a Coordination Agreement may be required to execute a relocation, and Toronto Hydro may collect a Design Pre-payment from the customer. |
| 2.2.1 | Disconnection & Reconnection – Process and Charges | Revised by removing the condition of allowing customers to work within the limits of approach to overhead lines. Revised customer charges for a disconnection and reconnection of electricity. |
| 2.3.2.1 | Power Quality Testing | Added a statement of where power quality monitoring will be conducted. |
| 2.3.2.2 | Prevention of Distortion on the Distribution System | Revised the corrective measures to be placed on customers having a non-linear load. |
| 2.3.2.2.1 | Voltage Distortion | Added new section, indicating voltage distortion limits. |
| 2.3.2.2.2 | Current Distortion | Added new section, indicating current distortion limits. |
| 2.3.2.3 | Obligation to Help in the Investigation | Added a statement that a list of vendors can be provided who are qualified to perform an investigation, and to supply and install corrective equipment. |
| 2.3.2.4 | Timely Correction of Deficiencies | Added reasons for having to disconnect the supply of electricity. |
| 2.3.4.2 | Supply Voltage | Added under the heading "when a transformer vault is used", the availability to connect to the 347/600 volt network system. |

| <p style="text-align: center;">CONDITIONS OF SERVICE Revision #16 <u>REVISION SUMMARY</u></p> | | |
|---|---|---|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| 2.3.7 | Metering | Added a statement to refer to a new reference document "Toronto Hydro Metering Services and Charges". |
| 2.3.7.3 | Interval Metering | Revised the conduit size from $\frac{3}{4}$ to $1\frac{1}{4}$ inch. |
| 2.4.3 | Deposits | Deleted the bi-monthly billing factor. |
| 2.4.4 | Billing | Deleted the conditions for aggregated billing and replaced it with the term "totalization". Deleted reference to bi-monthly billing. |
| 2.5 | Customer Information | Added a statement describing Toronto Hydro's privacy policy. |
| 3.3.4.1 | Short Circuit Ratings | Added a statement referring to the short circuit current on the 347/600 volt supply from the secondary network system. |
| 3.4.1 | Electrical Requirements | Revised by customers will be required to pay for an electricity disconnection. |
| 3.8 | Unmetered Connections | Added a statement that Toronto Hydro will not provide a service connection for an electrical outlet installation. |
| 4 | Glossary of Terms | Added the term "totalization". |
| Section 6 - References | Toronto Hydro Requirements for the Design and Construction of Customer-Owned High Voltage Substations | <p>Updated reference document #4 (Revision #8, dated October 21, 2016).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 3 Definitions; Former Toronto Area, - 7 Drawings and Information Required for Approval; CSA approval of switchgear assembly, - 7.7 Compliance Letter for Above Grade Substation; submission of a compliance letter, - 8.8.1 Substation Location; above ground installations, - 9.25 Faulted Circuit Indicators; FCI information to be submitted for review, - 11 Associated Publications; added reference to standards. |

| <p style="text-align: center;">CONDITIONS OF SERVICE Revision #16 <u>REVISION SUMMARY</u></p> | | |
|---|---|--|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| | | <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 8.5 Outdoor Substations – Fence and Gates; requirement for a fence and gate(s), - 8.8 Communication Lines; equipment required instead of a telephone, - 9.11 Circuit Breaker; reference to ANSI C37 series of standards, - 9.21.1 Line Differential Protection; updated relay general parameters. |
| Section 6 - References | Toronto Hydro Metering Requirements 750 Volts or Less | <p>Updated reference document #6 (Revision #10, dated September 30, 2016). Added new section 8.2 Electric Vehicle Charging Stations.</p> <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 7.14 (e); larger size conduit to be installed, - Appendix-Diagram #5; indicated the position for electric vehicle charging within the main switchboard. |
| Section 6 - References | Contractor Pre-Qualification Application | <p>Updated reference document #8 (version 2.3, dated August 25, 2016).</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - Instructions to Contractors – 2. Qualification; added “design qualifications” and “audit minimum employee training requirements” to the submission list, - Section One: Project Categories; added “Design Work” and “Audit Work” categories to the table, - Section Seven: Minimum Employee Training Requirements; added “Design” areas of training requirements to the table, |

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| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
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| | | <ul style="list-style-type: none">- Section Ten: Design Qualifications; added section,- Section Eleven: Audit Minimum Employee Training Requirements; added section. |
| Section 6 - References | Toronto Hydro Metering Services and Charges | New reference document #9 (dated October 14, 2016). |

APPENDIX D

| <p>CONDITIONS OF SERVICE Revision #17 <u>REVISION SUMMARY</u></p> | | |
|---|---|--|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| 1.2 | Related Codes and Governing Laws | Revised to indicate O. Reg. 213/91: Construction Projects under the OHSA, and the Electrical Utility Safety Rules published by the Infrastructure Health and Safety Association (IHSA). |
| 1.5 | Contact Information | Added contact information for customers to speak to a Customer Care representative. |
| 1.7.2 | Safety of Equipment | Added by providing examples of customer structures and objects, and conditions that may be affected. |
| 1.7.5 | Customer-Owned Equipment, Infrastructure, and Property | Added customers are liable for any damages or losses sustained to Toronto Hydro resulting from customer neglect to their equipment, infrastructure or property. |
| 1.8 | Disputes | Added contact information for customers to submit complaints regarding services provided by Toronto Hydro. |
| 2.1.5 | Relocation of Plant | Revised from "shall" to "may" for customers requiring to pay for any incremental costs incurred by Toronto Hydro. |
| 3.2 | General Service | Revised bullet (g) customer "may" rather than "shall" be required to pay the incremental costs incurred by Toronto Hydro when a customer requests the work be done outside normal business hours. Revised bullet (j) Toronto Hydro is not held liable if customer equipment becomes inoperative or damaged during switching activities, and customer may be required to sign a waiver form acknowledging Toronto Hydro's limited liability. |
| Section 6 - References | Toronto Hydro Requirements for the Design and Construction of Customer-Owned High Voltage Substations | Updated reference document #4 (Revision #9, dated August 28, 2017) Added statements to the following sections: <ul style="list-style-type: none"> - 7.1 Substation Drawing; added bullet (b) Distribution Power Riser diagram to indicate location of indoor substation, - 7.4 Switchgear Assembly Drawings; added bullet (k) provision for faulted circuit indicators (FCI), |

CONDITIONS OF SERVICE

Revision #17

REVISION SUMMARY

| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------|---|---|
| | | <ul style="list-style-type: none"> - 8.8 Communication Lines; requirement for a telephone in the electrical room, - Sketch 1 (B-1) to Sketch 1 (J-3); added FCI "Alternative Location of Faulted Indicators" and/or "Provided By Customer", as applicable. <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - Table 5 – Guidelines for Customer-Owned Substation Protection and Connections to Distribution System; column heading changed from "Maximum Single Transformer or Aggregate MVA" to "Maximum Single Transformer MVA" and column value changed from "<5" to "5", - 9.25 Faulted Circuit Indicators; bullet (d) indicated the preferred method to verify the status of the faulted circuit indicators. <p>Deleted content to the following sections:</p> <ul style="list-style-type: none"> - 9.3.3 Intercompartmental Primary Connections; removed "Insulating material between compartments is not permitted". |
| Section 6 – References | Toronto Hydro Requirements for the Design and Construction of Customer-Owned Structures | <p>Updated reference document # 5 (Revision #4, dated September 18, 2017)</p> <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 3.0 References; bullet (c) standards will be posted on Toronto Hydro website, - 4.1 Customer Responsibility; bullet (j) added "hazardous materials or gas egress", - 4.2 Engineering Drawings; bullet (d) customer to re-submit drawings or design of proposal requirements, - 4.4.1 Location Requirements; bullet (d) structure access requirements, - 4.4.3 a) Cable Chambers; bullet(1) indicate standard 31-2160, bullet (7) indicated depth of cover requirement instead of measurement, |

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| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------|---|--|
| Section 6 - References | Toronto Hydro Requirements for the Design and Construction of Customer-Owned Structures | <ul style="list-style-type: none"> - 4.4.3 b) Cable Pull Rooms; bullet(1) designed in accordance to standard 31-6070, - 4.4.3 d) Padmounts; bullet (1) revised padmounted installation requirements, - 4.5 Completion Date; bullet (b) conditions to when a structure can be equipped, - 4.6 Inspection by Toronto Hydro; bullet (a) revised to include "review and or", and included "splice vaults", - 5.4 Vault Design and Construction Requirements; bullet (g) waterproofing the structure, - 5.5. Vault Grounding Requirements; bullet (c) alternative grounding "methods" changed to "locations", - 5.8 Vault Fire Protection Requirements; bullet (b) systems shall be in proper working order, - 5.9 Vault Drainage Requirements; bullet (b) drainage to the vault as per Ontario Building Code and National Plumbing Code of Canada. <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 1.0 Purpose; vault is included in the listing, - 3.0 References; bullet (a) "The City of Toronto's Sewer By-law Chapter 681" added to the listing, - 3.0 References; bullet (c) added standards 31-4015, 31-4070, 13-2200 and 18-5500 to the list of referenced standards, - 4.2 Engineering Drawings; bullet (e) additional drawing requirements – Drawing to indicate aisle clearances and exists, and grounding arrangement, - 4.4.1 Location Requirements; bullet (e) guard posts requirements, new bullet (f) structures location requirements, - 4.4.2 Access Requirements; bullet (f) added "absent lawful authority and Toronto Hydro consent", |

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| | | <ul style="list-style-type: none"> - 4.4.3 a) Cable Chambers; bullet (4) customer's engineer is responsible for the design, - 4.4.3 b) Cable Pull Rooms; new bullets (2), (3), and (4) Added requirements dealing with providing secondary feed and lighting a cable pull room, - 5.4 Vault Design and Construction Requirements; bullet (c) references to Ontario Building Code clauses, bullet (e) requirements for customer to send proposed product specifications for review and approval, - 5.5. Vault Grounding Requirements; bullet (b) additional ground rod requirements, - 5.6 Vault Electrical Requirements; bullet (g) indicated light bulb types, and requirement for lamp holders and covers, - 5.7 Vault Ventilation Requirements; bullets (c) and (d) reference to Ontario Building Code clauses, new bullets (i) and (j) reference made to Ontario Building Codes clauses, - 5.8 Vault Fire Protection Requirements; bullet (c) reference to Ontario Building Code, bullet (d) reference to Ontario Building Code clause regarding sprinkler systems in vaults, bullet (e) made reference to Ontario Fire Code and Ontario Building Code, bullet (g) reference to standards 31-6020 and 31-6080, - 5.9 Vault Drainage Requirements, bullet (a) reference to Ontario Building Code clauses, bullet (c) reference to the City of Toronto's sewer by-law requirements. <p>Deleted content to the following sections:</p> <ul style="list-style-type: none"> - 4.4.3 a) Cable Chambers; bullet (2) removed statement "cable chamber internal dimensions will depend on the number of cables installed", |

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| | | <ul style="list-style-type: none"> - 4.4.3.6 Splice Vault or Splice/Tap Box (of previous version); removed bullets (4.4.3.6.3, 4.4.3.6.4, and 4.4.3.6.5), - 7.0 Vault Access Requirements (of previous version); bullet 7.4 is deleted, similar wording in section 4.4.2 (f) - 10.0 Electrical Requirements (of previous version), bullet 10.8 is deleted, the requirement is in section 5.6 (c) - 12.0 Fire Protection Requirements (of previous version) bullet 12.4 is deleted, similar wording placed in section 5.8 (c) - 14.0 Referenced Standard Drawings (of previous version); standards are being removed from the document, and are posted on Toronto Hydro's website. |
| Section 6 - References | Toronto Hydro Metering Requirements 750 Volts or Less | <p>Updated reference document #6 (Revision #11, dated July 21, 2017)</p> <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - 5.1.2 Non-Residential Meters – 300 Volts or Less; locations where meters can be mounted, - 7.9.2 Meter Sockets; bullet (b) outlined the conditions for the installation of a gang metering unit. <p>Added content to the following sections:</p> <ul style="list-style-type: none"> - 5.1.1 Residential Outdoor Meters; meter installation excludes high rise apartment and condominium buildings, - 5.1.3 Non- Residential Meters – Greater than 300 Volts; new section describing where meters can be mounted, - 7.3.1 Meter Cabinet for Meters Only; row added to Table I identifying the requirements for a gang metering unit. |

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| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
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| Section 6 - References | Toronto Hydro Distributed Generation Requirements | <p>Updated reference document #3 (Revision #6, dated October 4, 2017)</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none"> - 4.7.3 Metering; requirement for a four quadrant interval meter. <p>Revised content to the following sections:</p> <ul style="list-style-type: none"> - Throughout document – updated email addresses, - Appendices as applicable; changed a form's title from "Embedded Generation Connection Application Form" to "Distributed Energy Resources (DER) Application Form", - 4.4.3 Connection of Small, Mid-Sized and Large Generation Facilities; updated section title, - Appendix 4(ii) – Standard for Net Metering – Residential Service; standard 17-9500 Rev 3, note 1 (outdoor installation shall be weatherproof). <p>Deleted content to the following sections:</p> <ul style="list-style-type: none"> - 2.6.2 Net Metering Program; deleted bullets (i) to (iv) and replaced with reference to Ontario Regulation 541/05 regarding the eligibility for participating in the Net Metering program, - 3.3 Net Metered Generation Technical Requirements; deleted "and up to 500 kW", - Appendix 1(ii) – Embedded Generation Overview; deleted "and is less than 500 kW" under the heading Note: Net Metering Program. |

APPENDIX E

| CONDITIONS OF SERVICE Revision #18 <u>REVISION SUMMARY</u> | | |
|---|---|--|
| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
| 2.1.4 | Inspections Before Connections | Revised to align with the Electrical Safety Authority inspection requirements for temporary service connections. Revised to clarify the method to be used to verify ducts are clear from obstructions. |
| 2.3.7.3 | Interval Metering | Revised the conditions of where to install conduit for cellular and telephone installations. |
| 2.4.6 | Credit Refunds to Customer | Added a new section that if a credit amount is left on the customer's account after Toronto Hydro issues a final bill, Toronto Hydro will refund the customer. |
| 3.2.3 moved to 2.6 | Temporary Services | Revised/added the conditions and requirements for temporary service connections related to connection period, installation and removal of temporary facilities, charges, re-inspections, and supply connections. |
| Section 6 - References | Toronto Hydro Metering Requirements for 13.8 kV & 27.6 kV Customer-Owned Substations | Updated reference document #7 (Revision #6, dated August 1, 2018) Revised content to the following sections: - 10.5 Remote Metering (RIMS) – Services 50 kW and Greater; rearranged requirement order, and updated conduit requirements for cellular and telephone installations. |
| Section 6 – References | Toronto Hydro Requirements for the Design and Construction of Customer-Owned Structures | Updated reference document # 5 (Revision #5, dated August 27, 2018) Revised content to the following sections: - 4.4.1 Location Requirements; bullet (e) revised locations where structures cannot be installed, - 5.9 Vault Drainage Requirements; bullet (c) identified City of Toronto department as Environmental Monitoring and Protection (EM&P). Added statements to the following sections: - 3.0 References; bullet (c) added standards 15-8510, 18-5100, 31-4050 and 31-5120 to the list of referenced standards, - 4.4.3 a) Cable Chambers; bullet (8) fastening method for the membrane, bullet (10) indicated standard 18-5100, |

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| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
|------------------------|---|--|
| | | <ul style="list-style-type: none">- 4.4.3 c) Conduits/Duct Banks; new bullet (10) temporary elevated structures,- 4.4.3 d) Padmounts; new bullet (10) third party grounding study for deviations to standard,- 5.4 Vault Design and Construction Requirements; new bullet (d) loading requirements for suspended slab design. |
| Section 6 - References | Toronto Hydro Metering Requirements 750 Volts or Less | <p>Updated reference document #6 (Revision #12, dated August 14, 2018)</p> <p>Revised content to the following sections:</p> <ul style="list-style-type: none">- 7.9.3 Rating; bullet (a) and (b) indicated service sizes and its meter socket ratings,- 7.14 Remote Metering (RIMS) – Services 50 kW and Greater; rearranged requirement order, and updated conduit requirements for cellular installation. <p>Added content to the following sections:</p> <ul style="list-style-type: none">- Appendix Diagram #2; listed Toronto Hydro contact persons and phone numbers. <p>Deleted content to the following sections:</p> <ul style="list-style-type: none">- 7.3.1 Meter Cabinet for Meters Only; Table I: made a correction to the number of meters for a Gang Metering Unit, and removed a manufacturer/part number. |
| Section 6 - References | Toronto Hydro Requirements for the Design and Construction of Customer-Owned High Voltage Substations | <p>Updated reference document #4 (Revision #10, dated September 21, 2018)</p> <p>Added statements to the following sections:</p> <ul style="list-style-type: none">- 3. Definitions; added the term: NETA,- 5.2 Incoming Supply; requirement for a splice vault,- 5.6 Temporary Supply; new section regarding temporary supply connections,- 7.6 Protection Co-ordination and Arc Flash Studies; added the requirement to submit an arc flash study report,- 8.1.1 Substation Location; bullet (b) temporary transformer requirement,- 9.7.5 Line Side Cables or Bus; new section describing the installation of line side cables or bus,- 9.9 Lighting Arresters; selection of lighting arresters, |

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| Section | Section Title | Summary of Changes to Toronto Hydro's Conditions of Service |
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| Section 6 – References (cont'd) | Toronto Hydro Requirements for the Design and Construction of Customer-Owned High Voltage Substations (cont'd) | <ul style="list-style-type: none">- 9.11 Circuit Breakers; acceptance of self powered circuit breakers,- 9.12 Control Power Supply; added option 2 column to the table,- 9.17.9 Fixed Type Circuit Breaker; new section regarding the use of a fixed type circuit breaker,- 9.24.3 Protection of Cable Tie; new section regarding the protection of cable tie,- 9.27 Arc Flash Warning Signs; new section regarding arc flash warning sign,- 9.28 Re-used, Refurbished or Modified High-Voltage Equipment; new section regarding the requirements for not using new equipment,- 11 Associated Publications; added a NETA standard,- Sketches 1(H-2), 1(J-1), and 1(J-2); added splice vault requirement- Sketch 8; new sketch of arc flash sign. <p>Revised content to the following sections:</p> <ul style="list-style-type: none">- 3. Definitions; revised the term: vault,- 8.1.1 Substation Location; revised location alternatives,- 8.2.1 Means of Egress and Exit Door Requirements; door requirements- 9.2.3 Design of Enclosures; reference to outdoor switchgear,- 9.25 Faulted Circuit Indicators; Toronto Hydro to provide faulted circuit indicators, <p>Deleted content to the following sections:</p> <ul style="list-style-type: none">- 3. Definitions; deleted the term: Sprinkler-Proof Enclosure,- 9.25 Faulted Circuit Indicators; removed faulted circuit indicator requirement listing,- Sketches 1 (B-J); removed statement that FCIs to be provided by customer |

1 **RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES**

2

3 **INTERROGATORY 7:**

4 **Reference(s): Exhibit 1A, Tab 3, Schedule 1, p. 8**

5

6 Please provide a corporate organizational chart that includes the Director level of
7 employees.

8

9

10 **RESPONSE:**

11 Please see Toronto Hydro's response to interrogatory 1A-SEC-1.

1 **RESPONSES TO SCHOOL ENERGY COALITION INTERROGATORIES**

2

3 **INTERROGATORY 1:**

4 **Reference(s): Exhibit 1A, Tab 3, Schedule 1, p.8**

5

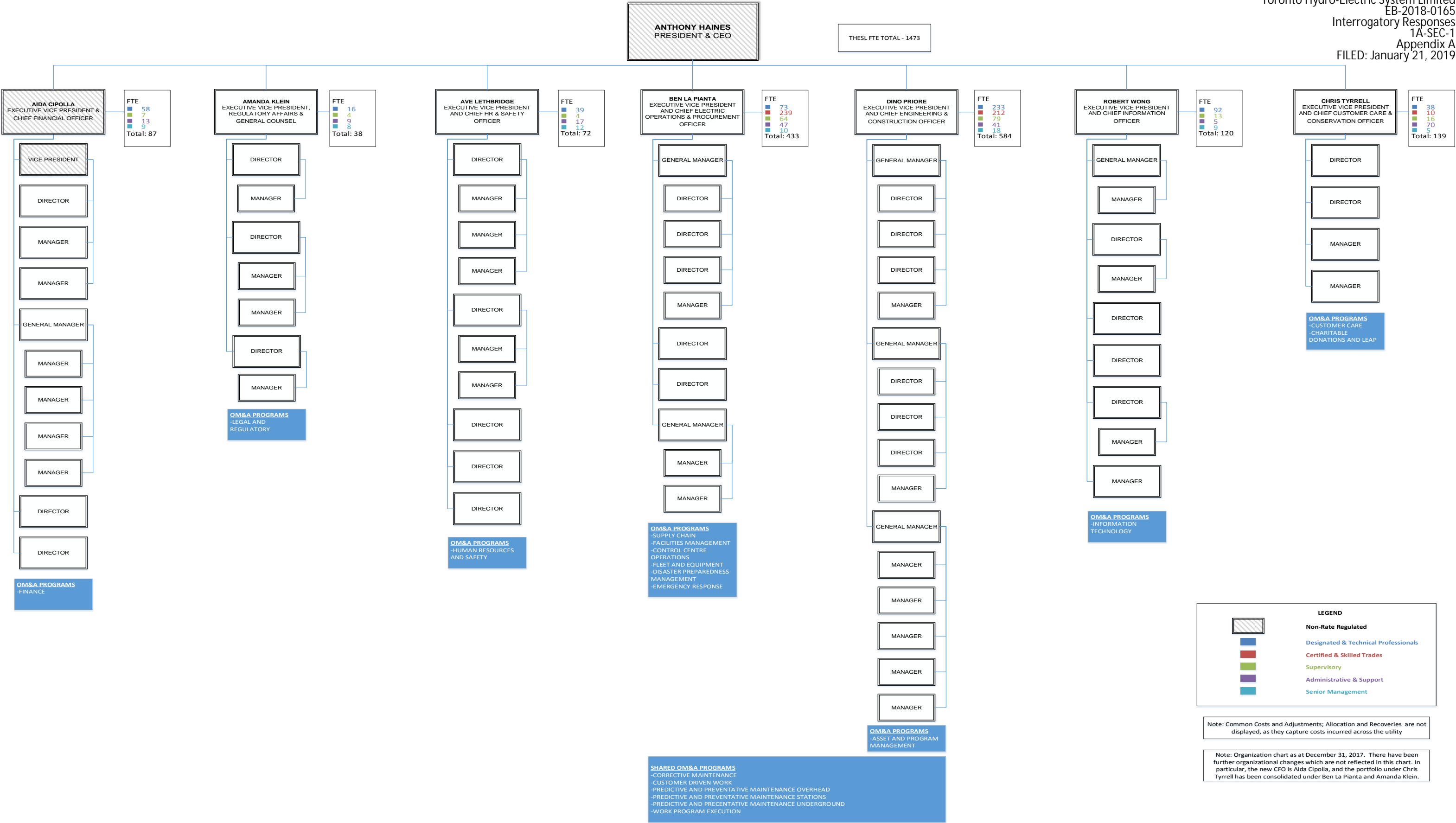
6 Please provide a copy of Toronto Hydro's full current organizational chart.

7

8

9 **RESPONSE:**

10 Please see Appendix A to this response.



RESPONSES TO VULNERABLE ENERGY CONSUMERS COALITION
INTERROGATORIES

INTERROGATORY 1:

Reference(s): **Exhibit 1A, Tab 3, Schedule 3**
 Exhibit 1C, Tab 2, Schedule 1

a) Please provide the names of the officers shown in Figure 1: Toronto Hydro's Organizational Chart.

b) Please provide the compensation disclosure for each officer provided in a).

RESPONSE:

a) Please refer to Toronto Hydro's response to interrogatory 1A-SEC-1.

b) Please refer to Toronto Hydro's response to interrogatory 1B-SEC-8.