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**BY EMAIL**

March 26, 2019

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Toronto Hydro-Electric System Limited (Toronto Hydro)  
Application for 2020-2024 Rates  
OEB Staff Interrogatories on the Evidence of the Distributed Resource  
Coalition  
Board File Number: EB-2018-0165**

In accordance with Procedural Order No. 6, dated March 14, 2019, please find attached OEB staff's interrogatories on the evidence of the Distributed Resource Coalition (DRC) in the above noted proceeding.

DRC's responses to interrogatories are due by April 11, 2019.

Yours truly,

*Original Signed By*

Lawrie Gluck  
Case Manager

cc: All parties in EB-2018-0165

**TORONTO HYDRO-ELECTRIC SYSTEM LIMITED**

**2020-2024 RATES**

**EB-2018-0165**

**DISTRIBUTED RESOURCE COALITION EVIDENCE**

**OEB STAFF INTERROGATORIES**

**March 26, 2019**

**M2-Staff-1**

**Ref: Exhibit M2 / p. 5**

Preamble:

The Canadian Urban Transit Research & Innovation Consortium (CUTRIC) urged the OEB to facilitate Toronto Hydro's integration of electric vehicles (EVs), battery electric buses (BEBs), and charging infrastructure into its 2020-2024 distribution system plan (DSP) and revenue requirement.

CUTRIC also states that its evidence does not advocate for a specific model for the ownership of EV, BEB and charging infrastructure. CUTRIC states that all of the benefits can be achieved regardless of whether the utility pursues a regulated or unregulated EV charging business model (Exhibit M2 / p. 5).

Question(s):

- a) Please provide a summary of the key recommendations in the evidence in terms of the findings that CUTRIC seeks the OEB to make as part of the current proceeding. As part of the response, please specifically advise whether it is CUTRIC's proposal that Toronto Hydro should include capital and OM&A costs of EV charging infrastructure in its 2020-2024 revenue requirement to be funded by ratepayers.

**M2-Staff-2**

**Ref: Exhibit M2 / p. 3**

Preamble:

CUTRIC stated that it is reasonable to assume the Toronto Transit Commission's (TTC) fleet of buses would need to be at least 30% electrified by 2025 to achieve the TTC's goal of zero-emissions by 2040, which would result in new revenues to Toronto Hydro of approximately \$6 million per annum by 2025.

The \$6 million revenue figure seems to have been calculated based on the current time-of-use commodity rates.

CUTRIC stated that the \$6 million in revenue could be distributed across the customer base in the form of savings or utilized to offset the costs of utility-owned, operated and maintained EV charging infrastructure (Exhibit M2 / p. 3).

Question(s):

- a) Please advise whether it is CUTRIC's position that Toronto Hydro should invest the capital necessary to achieve the 30% electrification of TTC buses cited in the evidence. If so, please provide an estimate of both the capital investment and ongoing annual OM&A spending required (including a detailed breakdown of the types of capital and OM&A costs that would be incurred).
- b) Please advise whether it is CUTRIC's position that Toronto Hydro should use revenues generated through commodity rates (which Toronto Hydro does not retain, and merely collects on behalf of the IESO) to offset the capital and OM&A costs of installing and operating EV charging infrastructure.

### **M2-Staff-3**

**Ref: Exhibit M2 / p. 5 / Table 1**

Preamble:

CUTRIC provided the following summary table of load and revenues generated from the electrification of the TTC bus fleet and privately-owned light vehicles in Toronto.

	TTC's (ebus) electrification (100% of fleet by 2040)	TTC's (ebus) electrification (30% of fleet by 2025)	Toronto's EV (car) electrification (5% by 2025)
Total GWh	203	61	189
\$	\$20,015,800	\$6,004,740	\$18,635,400

Question(s):

- a) Please advise whether it is CUTRIC's proposal that the estimated 2020-2024 load associated with the electrification of TTC buses and privately-owned light vehicles should be added to Toronto Hydro's load forecast for the 2020-2024 period. If so, please provide the estimated load for each year of the 2020-2024 period that should be included. Please also provide all supporting calculations.

**M2-Staff-4**

**Ref: Exhibit M2 / p. 11**

Preamble:

CUTRIC stated that the overhead charging system in York Region will be owned, operated and maintained by Newmarket-Tay Power Distribution Limited for the purpose of rapid charging of the electric buses of York Region Transit (Exhibit M2 / p. 11).

Question(s):

- a) Please advise whether Newmarket-Tay Power Distribution Limited proposes to own the noted EV charging assets as part of its regulated business or through an affiliate.

**M2-Staff-5**

**Ref: Exhibit M2 / p. 13**

Preamble:

CUTRIC stated that Toronto Hydro should develop a strategic initiative that considers a number of factors (Exhibit M2 / p. 13).

Question(s):

- a) Please further explain the "strategic initiative" that CUTRIC is requesting that Toronto Hydro undertake. Specifically, please provide the goals of the initiative as they relate to the distribution of electricity in Toronto and advise whether a report on this initiative should form part of Toronto Hydro's evidence in its 2025 rebasing proceeding.