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March 29, 2019

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

Dear Ms. Walli:

**Re: Toronto Hydro-Electric System Limited ("Toronto Hydro")
Custom Incentive Rate-setting ("Custom IR") Application for 2020-2024 Electricity Distribution
Rates and Charges – Undertaking Responses and Technical Conference Corrections
OEB File No. EB-2018-0165**

Please find enclosed an electronic consolidated copy of Toronto Hydro's responses to all undertakings from the Technical Conference on February 19-22, 2019. As noted in the utility's letter on March 13, 2019, this copy includes the responses previously filed on March 4 and March 13, 2019. Seven physical copies of the Undertaking Responses will follow via courier.

Toronto Hydro notes that on February 26, 2019, the Building Owners and Managers Association ("BOMA") submitted a number of questions that had not marked as undertakings at the Technical Conference. Toronto Hydro marked and answered BOMA's questions as undertakings JTC3.30 - JTC3.31.

In preparing the undertaking responses, Toronto Hydro identified a number of corrections to the Technical Conference transcripts. These corrections are detailed in Appendix A to this letter. To ensure that the record from the Technical Conference is accurate and complete, Toronto Hydro requests that the transcripts be amended with the corrected language set out in Appendix A.

In addition, Toronto Hydro identified a number of clarifications that it would like to make in respect of the responses provided by its witnesses at the Technical Conference.

- On Day 1, page 46, lines 2-14, the witness responded with reference to Toronto Hydro's interrogatory response to 2B-STAFF-80(b), in which the utility stated that the average cost per customer is based on average costs from rear lot costs constructed in 2015-2017. Upon detailed review and as noted in its response to undertaking JTC1.8, Toronto Hydro noticed that the original interrogatory response was incorrect and that the actual project costs used to determine the cost per customer were over the 2013-2017 period.
- On Day 1, page 48, lines 23-24 and page 49, lines 7-8, the witness referred to Toronto Hydro's interrogatory response to 2B-AMPCO-56(b), whereas the correct reference should have been to part (d) of 2B-AMPCO-56.

- On Day 1, page 101, lines 10-11, the witness stated that the 2016 Asset Condition Assessment results were based on early 2016 data. Upon detailed review and as noted in the response to undertaking JTC 2.13, these results were actually based on data from the end of 2016.
- On Day 2, page 115, lines 25-27, the witness stated that the threshold for change requests for OM&A expenses is \$25,000, whereas this threshold is actually \$50,000.
- On Day 2, page 155, lines 9-10, whereupon Mr. Hann asked if the changes from central to unit metering account for 4 % of the increase in customer numbers on average per year, the witness responded that this rate of increase is for the entire period. Upon detailed review, Toronto Hydro confirms that the relevant changes actually account for 4% of the increase per year.
- On Day 3, page 22, line 23 and page 23, lines 1 and 12, the witness acknowledged the description of the calculation of the vacancy budget for the 2020-2024 rate period as suggested by counsel for the Schools Energy Coalition. However, upon detailed review, Toronto Hydro notes that more accurately, the vacancy lag in the plan is based on historical average vacancy by division by employee category multiplied by the average compensation for each employee category within the same division.
- On Day 3, page 55, lines 7-9, the witness identified the per customer electronic bill savings on paper, printing, and postage costs combined as \$0.87, whereas the actual savings is \$0.88.
- On Day 3, page 81, lines 21-22, the witness stated that the function of Vice President, Internal Audit and Corporate Compliance is included under the “Corporate Stewardship – CEO” shared service allocated from Toronto Hydro Corporation to Toronto Hydro. Upon detailed review, Toronto Hydro confirms that this function is not included in that shared service.
- On Day 3, page 108, line 18, the witness identified the capital budget of the Fleet & Equipment Services program for the 2020-2024 rate period as \$45.2 million, whereas the actual budget figure is \$42.5 million, as noted in Exhibit 2B, Section E8.3, Table 1 of the Application.

Please contact me directly if you have any questions or concerns.

Respectfully,



Andrew J. Sasso

Director, Regulatory Affairs

Toronto Hydro-Electric System Limited

cc: Lawrie Gluck, OEB Case Manager
Michael Miller, OEB Counsel
Parties of Record
Amanda Klein, Toronto Hydro
Daliana Coban, Toronto Hydro
Charles Keizer, Torsys LLP

Appendix A: EB-2018-0165, Technical Conference Transcript Corrections (March 29, 2019)

Original Transcription	Requested Correction (in red font)
Day 1, page 32, lines 17-19: "MS. CIPOLLA: That's correct. The 5-year capital plan approved is an envelope of the dollar -- of the capital program."	MS. CIPOLLA: That's correct. The 5-year capital plan approved is an envelope of the dollars for the capital related revenue requirement of the capital program.
Day 1, page 71, line 4: "MR. RICHMOND: ..."	MR. LYBEROGIANNIS : ...
Day 1, page 111, lines 19-22: "MS. CIPOLLA ... And so the basis of that is based on a useful life that is appropriate to the specific assets. And so we received the Kinectrics study specific to Toronto Hydro's assets, and we are allowed within the Board to use within that study within the range."	MS. CIPOLLA ... And so the basis of that is based on a useful life that is appropriate to the specific assets. And so we received the Kinectrics study specific to Toronto Hydro's assets, and we are allowed by the Board to use that study within the range .
Day 1, page 156, lines 26-28 and page 157, lines 1-3: "MR. LYBEROGIANNIS: So the specific reports that are referenced here, panel 2, is Mr. Nahim, who is responsible for our control room and our emergency response program. What Mr. Nahim can speak to is we receive somewhere between 22,000 and 27,000 events a year that Toronto Hydro responds to."	MR. LYBEROGIANNIS: So the specific reports that are referenced here, panel 2, is Mr. Nahyaan , who is responsible for our control room and our emergency response program. What Mr. Nahyaan can speak to is we receive somewhere between 22,000 and 27,000 events a year that Toronto Hydro responds to.
Day 4, page 20, line 5: "MR. LYLE: Could I have the reference again, please?"	MR. LENARTOWICZ : Could I have the reference again, please?
Day 4, page 66, line 25: "MS. CHAN: If you refer to 9-Staff-59, part E."	MS. CHAN: If you refer to 9-Staff-159 , part E.
Day 4, page 172, lines 11-13: "MR. FENRICK: It's my understanding that the software, the Google Earth software that Mr. Sanju and his team used does provide the side view."	MR. FENRICK: It's my understanding that the software, the Google Earth software that Mr. Sonju and his team used does provide the side view.
Day 4, page 181, lines 21-25: "MR. FENRICK: ... It serves a highly concentrated congested urban service territory, and that factor or variable needs to be adjusted for, and consolidated, as does Edison, and New York City is the same situation."	MR. FENRICK: ... It serves a highly concentrated congested urban service territory, and that factor or variable needs to be adjusted for, and Consolidated Edison, and New York City is the same situation.