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April 11, 2019

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

Dear Ms. Walli:

Re: Toronto Hydro-Electric System Limited
Application for order or orders approving or fixing just and reasonable distribution
rates and other charges, effective January 1, 2020 to December 31, 2024
Board File No. EB-2018-0165

We are counsel to the Distributed Resource Coalition (**DRC**) in the above-referenced proceeding. Further to Procedural Order No. 6, please find enclosed DRC's responses to the interrogatories received from the Vulnerable Energy Consumers Coalition.

Yours very truly,

A handwritten signature in black ink, consisting of a stylized, flowing line that starts with a loop and ends with a long, sweeping horizontal stroke.

Lisa (Elisabeth) DeMarco

- c. Charles Keizer and Arlen Sternberg, Torys LLP
Andrew Sasso and Daliana Coban, Toronto Hydro
Distributed Resource Coalition

DRC RESPONSES TO VECC INTERROGATORIES

Interrogatory: M2-VECC-1

Reference: Exhibit M2

Question(s): a) What relief is the Distributed Resource Coalition (DRC) seeking from the Board in this Application?

Response(s): a) Please refer to our responses to M2-Staff-1 and M2-Staff-3.

DRC RESPONSES TO VECC INTERROGATORIES

Interrogatory: M2-VECC-2

Reference: Exhibit M2 / p. 3

Question(s): a) The application before the Board is for the establishment of just and reasonable electricity distribution rates for Toronto Hydro. The benefits articulated by DRC are societal or seek to change peak power demands. Specifically what sections of the OEB Act are being relied upon to seek an order of the Board for relief?

Response(s): a) Please refer to our responses to interrogatories M2-Staff-1 and M2-Staff-3. The CUTRIC evidence may impact the Board's treatment of the load forecast, the Distribution System Plan (**DSP**), capital and OM&A spending, all of which are relevant to the Board's jurisdiction in setting just and reasonable rates pursuant to section 78 of the *Ontario Energy Board Act, 1998*.

DRC RESPONSES TO VECC INTERROGATORIES

Interrogatory: M2-VECC-3

Reference: Exhibit M2 / p. 7

Preamble: At the above reference it states:

Toronto Hydro may wish to develop rates and services for electrified heavy-duty vehicles in order to facilitate systems integration, installation, operation, maintenance and control of high- and low-powered charging systems for BEBs, municipal trucks, and integrated energy storage resources. We envision that this could be done directly as the utility or through an affiliate or competitive entity for the benefit of distribution customers. Toronto Hydro may, either directly or indirectly, also wish to consider providing related services to surrounding communities with local distribution companies that do not have the scope or scale to provide related charging infrastructure installation and services.

The evidence vaguely discusses two different concepts – some form of distribution or power rate (it is not clear which) and the construction of infrastructure (presumably charging stations).

- Question(s):**
- a) Please clarify – is DRC suggesting or seeking that Toronto Hydro construct charging stations?
 - b) What type/form of rates are being suggested in this reference?

- Response(s):**
- a) Please refer to our responses to interrogatories M2-Staff-1, M2-Staff-3, and M2-Staff-5.
 - b) Please refer to our responses to interrogatories M2-Staff-1 and M2-Staff-3. The type and form of rates should align with the business and ownership model that Toronto Hydro intends to pursue to accommodate the reality of significant EV fleet and personal vehicle electricity demands during the 2020-2024 period. They may take, without limitation, the form of specific EV charging rate(s) if the EV DER charging infrastructure is developed within the utility, and/or distribution

connection and/or system access rates if the EV DER
charging infrastructure is developed outside of the utility.

DRC RESPONSES TO VECC INTERROGATORIES

Interrogatory: M2-VECC-4

Reference: Exhibit M2 / p. 11

Question(s): a) There is a suggestion at section 3 of the evidence that Toronto Hydro should consider the speculated new electricity electric demands from electric vehicles in its distribution system plan. What specific change(s) is DRC seeking to the distribution system plan filed with this Application?

Response(s): a) Please refer to our responses to interrogatories M2-Staff-1 and M2-Staff-3.