Fogler, Rubinoff LLP

Lawyers

77 King Street West Suite 3000, PO Box 95 TD Centre North Tower Toronto, ON M5K IG8 t: 416.864.9700 | f: 416.941.8852

foglers.com

May 21, 2019

Reply To: **Thomas Brett** Direct Dial: 416.941.8861 E-mail: tbrett@foglers.com Our File No. 184158

VIA RESS, EMAIL AND COURIER

fogler rubinoff

Ontario Energy Board 2300 Yonge Street 27th Floor Toronto, Ontario M4P 1E4

Attention:

Kirsten Walli,

Board Secretary

Dear Ms. Walli:

EB-2018-0165: Toronto Hydro-Electric System Limited, Application for Electricity Re:

Distribution Rates beginning January 1, 2020 until December 31, 2024

Please find enclosed herewith BOMA's Second Round Interrogatories.

Yours truly,

FOGLER, RUBINOFF LLP

Thomas Brett

TB/dd

Encls. cc:

All Parties (via email)

I:\F\Fraser & Company_F1588\184158_BOMA - EB-2018-0165_ Toronto Hydro-Elect\Documents\L-Walli (2nd Round IRs).docx

ONTARIO ENERGY BOARD

Toronto Hydro-Electric System Limited

Application for Electricity Distribution Rates beginning January 1, 2020 until December 31, 2024

SECOND ROUND INTERROGATORIES OF

BUILDING OWNERS AND MANAGERS ASSOCIATION, GREATER TORONTO ("BOMA")

May 21, 2019

Tom Brett
Fogler, Rubinoff LLP
77 King Street West, Suite 3000
P.O. Box 95, TD Centre North Tower
Toronto, ON M5K 1G8

Counsel for BOMA

Interrogatories of BOMA

U-BOMA-121

Ref: U-Exhibit 1A, Sch 2, p5

- (a) Table 3 provides bill increases for each rate class for each year of the 2020-2024 plan. Please provide a similar table which shows the updated distribution charge increase for each rate case for each year of the plan. Please do not include the impact of any rate riders in the table.
- (b) Please provide a similar table to the one requested in (a) above, but inclusive of the impacts of any rate riders anticipated over the plan term.

U-BOMA-122

Ref: U-Letters of Comment; Exhibit 1B, Tab 3, Sch 5

In Toronto Hydro's reply to Mr. Dean Lancaster's letter of comment, it stated:

"as a result of a five year plan for 2020-2024, a typical residential customer can expect an annual increase of 1.7% on the delivery line of the bill and less than one-half of one percent on the total electricity bill".

Please provide what additional items are included in the "delivery line of the bill" in addition to the bare distribution charge and indicate what would be the average annual increase in the distribution charge component alone of the items in the delivery line of the bill.

U-BOMA-123

Ref: U-Ibid, p12

Does Toronto Hydro's bill make clear to customers what part of the bare distribution charge is fixed and which part varies with consumption for each rate class in 2019? Is the fixed component of the distribution charge now 100% of that charge for residential and small commercial customers? If so, please explain why the response that the delivery line is partially based on customer's consumption volumes is not misleading customers. Please advise if the delivery line of the bill reflects, in part, customer's consumption of electricity is due to the fact that other components of the delivery charge, such as rate riders, are collected on a volumetric basis. Please explain fully.

U-BOMA-124

Ref: U-Ibid

A number of letters of comment state that the delivery charge should not be based entirely on a fixed annual customer charge, but should also reflect customer's consumption volumes. Has Toronto Hydro considered requesting the OEB to revise the current rate design for residential and small commercial customers to collect some of the delivery charge on a volumetric basis, rather than 100% of the delivery charge from a uniform fixed monthly customer charge? If not, why not, given the evident customer dissatisfaction with the current method? Please show how rate riders and any other non-distribution charge components of the delivery line of the bill are collected. Please address each item separately and in detail.

U-BOMA-125

Ref: U-Exhibit 2A, Sch 1, p11 of 12

Please provide a comparable table to Table 7, which shows the same information on Table 7, as shown in the original filing. Please include a column for 2018 actuals.

U-BOMA-126

Ref: U-Exhibit 2A, Sch 2, pp1-5

Please provide comparable fixed asset continuity schedules for 2014 through 2019, using 2018 actuals.

U-BOMA-127

Ref: U-Exhibit 2B, Section E6.3 (blue page)

- (a) Please provide the amount and dollar volume of the PILC cables to be removed, which are referred to at p28 of 37. What is the revised amount relative to the amount in the original filing? Please show how the change impacts the total spend on underground cables.
- (b) For each correction shown in the blue pages, please show the equivalent text in the original filing so that the reader can determine what exactly has been changed from the original filing. Please show this information for each "correction" on the blue pages.