

**Andrew J. Sasso**  
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June 12, 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: EB-2018-0165, Toronto Hydro-Electric System Limited ("Toronto Hydro")  
Custom Incentive Rate-setting ("Custom IR") Application for 2020-2024 Electricity  
Distribution Rates and Charges – Responses to Evidence Update Interrogatories and  
Correction**

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On June 11, 2019, Toronto Hydro submitted its responses to interrogatories posed with respect to the Application Update. In a subsequent review, Toronto Hydro determined that it needs to amend its response to the interrogatory, U-AMPCO-124. The revised response attaching the 2017 and 2018 Canadian Electricity Association ("CEA") Reports is appended to this cover letter. Please note that the latter (2018 CEA Report) was issued yesterday, subsequent to the finalization of the filing.

Pursuant to Rule 10.01 of the OEB's *Rules of Practice and Procedure* and the OEB's *Practice Direction on Confidential Filings* (the "**Practice Direction**"), Toronto Hydro hereby requests the confidential treatment of the 2017 and 2018 CEA Reports. In EB-2014-0116, the Ontario Energy Board (the "OEB") considered the confidentiality of other CEA reports. The OEB determined that the disclosure of those reports would prejudice CEA's competitive position and would produce a significant economic loss to the CEA. The OEB concluded that if the reports were publicly available, the CEA would lose the ability to sell it for financial gain. In striving to find a balance between the general public interest in transparency and openness, and the need to protect the CEA's competitive position, the OEB was satisfied that confidential treatment of the CEA reports was warranted.<sup>1</sup> While the CEA reports from EB-2014-0116 were benchmarking reports, whereas the 2017 and 2018 CEA Reports being filed at this time are general industry information reports, Toronto Hydro submits that for the purposes of a confidentiality determination, the reports are sufficiently similar to receive the same treatment.

Please note that the 2017 and 2018 CEA Reports are being provided to the OEB in a separate, sealed envelope that is marked "Confidential" and have been excluded from the electronic version of this request.

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<sup>1</sup> EB-2014-0116, OEB Decision and Order on Notice of Motion, February 11, 2015, pp. 10-11.

Please do not hesitate to contact me if you have any questions.

Yours truly,

A handwritten signature in blue ink that reads "Andrew J. Sasso". The signature is fluid and cursive, with the first name "Andrew" and last name "Sasso" clearly legible.

**Andrew J. Sasso**

Director, Regulatory Affairs

Toronto Hydro-Electric System Limited

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

3  
4     **INTERROGATORY 124:**

5     **Reference(s):**             **Exhibit U, Tab 1C, Schedule 5, p. 14**

6  
7     THESL's Annual Information Form for The Year Ended December 31, 2018 provides the  
8     following information with respect to Reliability of the Distribution System:

(vii)     *Reliability of Distribution System*

The table below sets forth certain industry recognized measurements of system reliability with respect to LDC's electricity distribution system and the composite measures reported by LDC and the CEA for the twelve month periods ending December 31 in the years indicated below.

	<b>LDC</b>	<b>LDC</b>	<b>CEA</b>
	<b>2018</b>	<b>2017</b>	<b>2017<sup>(1)</sup></b>
SAIDI .....	0.98	0.99	7.15
SAIFI .....	1.48	1.43	2.53
CAIDI.....	0.66	0.69	2.82

9  
10    The Note at the bottom of the Table states "Data was extracted from the CEA's 2017  
11    Service Continuity Report on Distribution System Performance in Electrical Utilities,  
12    excluding significant events. At the date of this AIF, such report for the year 2018 has not  
13    been published by the CEA. Please provide the CEA Reports for 2017 and 2018.

14  
15  
16    **RESPONSE:**

17    Please see Appendices A and B to this response (filed confidentially).                     /C

## **APPENDIX 'A'**

**Canadian Electricity Association, 2017 Service Continuity Data on DSP Report**

**[Note: A copy of this Appendix has been filed confidentially with the OEB in accordance with the *Practice Direction on Confidential Filings*]**

## **APPENDIX 'B'**

**Canadian Electricity Association, 2018 Service Continuity Data on DSP Report**

**[Note: A copy of this Appendix has been filed confidentially with the OEB in accordance with the *Practice Direction on Confidential Filings*]**