



PUBLIC INTEREST ADVOCACY CENTRE  
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February 3, 2020

VIA E-MAIL

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
Toronto, ON

Dear Ms. Long:

**Re: EB-2018-0165 Toronto Hydro Electric System Limited ("THESL")  
DRO Submission**

We have reviewed the THESL's draft rate order (DRO) and the comments of Board Staff with respect to that order. VECC supports the proposals of Board Staff with respect to the rate smoothing and disposition methodology for the deferral and variance accounts (Pages 6 and 7 of Staff's submission).

Yours truly,

*M. Garner*

Consultant for VECC-PIAC

Mr. Andrew Sasso, Director Regulatory Affairs, THESL  
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