

BY EMAIL and RESS

February 12, 2024

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Marconi:

**EB-2023-0195 Toronto Hydro-Electric System Limited 2025–2029 Rates Application -
Building Owners and Managers Association's Interrogatories**

Enclosed are the Interrogatories of the Building Owners and Managers Association (BOMA).

Sincerely,



Clement Li
Director, Policy & Regulatory Development
Enerlife Consulting Inc.
cli@enerlife.com

EB-2023-0195

**Toronto Hydro-Electric System Limited's Application for Electricity Distribution Rates
beginning January 1, 2025, and for each following
year through to December 31, 2029.**

**Interrogatories to Toronto Hydro-Electric System Limited on behalf of
the Building Owners and Managers Association (BOMA)**

2B-BOMA-1

Reference:

Exhibit 2B, Section D4, page 4 of 18, Section D4.1.1.3 Hyperscale Data Centre Demand Driver Analysis

Preamble:

In the referenced evidence, Toronto Hydro identified hyperscale data centre connections as a new driver of significant peak demand growth over the 2025 to 2029 period.

Question:

Does Toronto Hydro expect all these hyperscale data centres will be connected as "Large User" (i.e. the Large User Rate Class)? If not, what other rate classes will these hyperscale data centres go to?

2B-BOMA-2

Reference:

Exhibit 2B, Section D4, Appendix A, page 2 of 12, Section 1 – Public Policies and Objectives, lines 6 to 8

Preamble:

In the referenced evidence, Toronto Hydro identified “City of Toronto’s Toronto Green Standard” as one of the policies that drives its Future Energy Scenarios and stated that:

“...The most recent version all but eliminates the use of natural gas in new buildings.”

Question:

How does the “City of Toronto’s Toronto Green Standard” policy impact Toronto Hydro’s 2025 to 2029 commercial load forecast? Please quantify the impact on both the kWh and kW forecast.

3-BOMA-3

References:

Exhibit 3, Tab 1, Schedule 1, pages 1 to 2, Table 1

Preamble:

In the referenced evidence, Toronto Hydro's 2018 to 2029 total Normalized GWh and MVAs are provided.

Questions:

- A. Please provide Toronto Hydro's actual total distribution system load shapes (24 hourly MVAs) on both the winter peak day and the summer peak day in 2019.
- B. Please provide Toronto Hydro's forecast total distribution system load shapes (24 hourly MVAs) on both the winter peak day and the summer peak day in 2025 and in 2029.
- C. Please further break down your responses to part A and part B into 5 categories:
 - i) CSMUR rate class
 - ii) Residential rate class
 - iii) Commercial sector
 - iv) Industrial sector
 - v) Other sector
- D. Please further break down your response to part C iii (i.e. commercial sector) into commercial building types (e.g. office buildings, retail, hospitals, schools kindergarten to grade 12 schools, college and university, etc.).

3-BOMA-4

Reference:

Exhibit 3, Tab 1, Schedule 2 (OEB Appendix 2-1B)

Preamble:

Toronto Hydro's load forecast, including number of customers, annual kWh consumption and demand by rate class are provided in Exhibit 3-1-2.

Questions:

Further break down of commercial sector information in Exhibit 3-1-2:

- A. For the rate classes "GS 50-999 kW", "GS 1000-4999 kW" and "Large User", please further break down 2017 to 2029 annual number of customers, weather normalized annual consumption kWh and weather normalized annual demand kW by residential (if applicable), commercial and industrial sectors.
- B. Please further break down your response to part A by commercial building types (e.g. office buildings, retail, hospitals, kindergarten to grade 12 schools, college and university, etc.). Please note that this question is on the commercial sector only and therefore there is no need to further break down the residential and industrial figures provided in part A.
- C. Please further break down the weather normalized annual consumption kWh and weather normalized annual demand kW given in your response in part B by month.
- D. Please further break down the weather normalized annual consumption kWh and weather normalized annual demand kW given in your response in part B by the following two categories:
 - i) Buildings built after January 2017
 - ii) Buildings built prior to January 2017
- E. Please further break down the weather normalized annual consumption kWh and weather normalized annual demand kW given in your response in part B by the following two categories:
 - i) Class A customers
 - ii) Class B customers
- F. Please provide the floor space or square footage associated with the responses given for each category in part D.
- G. For the rate class "CSMUR", please provide 2017 to 2029 weather normalized monthly consumption kWh and weather normalized monthly demand kW (based on smart meter data).
- H. Please further break down the "CSMUR" 2017 to 2029 weather normalized annual consumption kWh by the following two categories:
 - i) Buildings built after January 2017
 - ii) Buildings built prior to January 2017

- I. Please provide the floor space or square footage associated with the responses given for each category in part H.
- J. Please provide individually, the annual impact of CDM, the annual impact of electrification (e.g. switching from natural gas heating to electric heating such as air source heat pump), the annual impact of EV charging and the annual impact of customer owned DER on the weather normalized annual consumption kWh and weather normalized annual demand kW given in your response in part B. To be specific, does the impact of CDM include the adoption of building ventilation heat recovery, heat recovery chillers and the service provided by district energy companies (e.g. Enwave Energy Corporation)? If yes, please quantify the impact of these adoptions.
- K. For the rate class "CSMUR", please provide individually, the annual impact of CDM, the annual impact of electrification (e.g. switching from natural gas heating to electric heating such as air source heat pump), the annual impact of EV charging and the annual impact of customer owned DER on the weather normalized annual consumption kWh from 2017 to 2029. To be specific, does the impact of CDM include the adoption of building ventilation heat recovery, heat recovery chillers and the service provided by district energy companies (e.g. Enwave Energy Corporation)? If yes, can you quantify the impact of these adoptions?

8-BOMA-5

References:

Exhibit 8, Tab 1, Schedule 1 Table 2: Monthly Fixed Charge (\$)

Preamble:

In the referenced table, the proposed 2025 monthly fixed charge for the "GS 1000-4999 kW" and "Large Use" rate classes are listed as \$1,191.22 and \$5,138.68, respectively. Both these figures are substantially higher than the corresponding CA Model Ceiling figures (listed as \$162.48 and \$497.05, respectively).

Question:

Please explain why Toronto Hydro did not reconcile the proposed monthly fixed charge for the "GS 1000-4999 kW" and "Large Use" rate classes with the corresponding CA Model Ceiling figures.