RESPONSES TO ONTARIO ENERGY BOARD STAFF INTERROGATORIES

2

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INTERROGATORY 1A-STAFF-1

4 Reference: N/A

5

6 Preamble:

7 Updated Revenue Requirement Work Form (RRWF) and Models

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QUESTION (A):

a) Upon completing all interrogatories from Ontario Energy Board (OEB) staff and intervenors, please provide an updated RRWF in working Microsoft Excel format with any corrections or adjustments that the Applicant wishes to make to the amounts in the populated version of the RRWF filed in the initial applications. Entries for changes and adjustments should be included in the middle column on sheet 3 Data_Input_Sheet. Sheets 10 (Load Forecast), 11 (Cost Allocation), and 13 (Rate Design) should be updated, as necessary. Please include documentation of the corrections and adjustments, such as a reference to an interrogatory response or an explanatory note. Such notes should be documented on Sheet 14 Tracking Sheet and may also be included on other sheets in the RRWF to assist understanding of changes.

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RESPONSE (A):

- Toronto Hydro notes that it is not possible to complete this work within the timelines for
- 23 responding to interrogatories. This information will be provided in advance of the Technical
- 24 Conference, along with the updated 2025-2029 revenue requirement and rates, as well as DVA
- balances and rate riders, related to the following:
 - (i) the 2023 financial actuals and updated 2024 forecast along with any material downstream impacts to 2025-2029 forecasts;²

¹ EB-2023-0195, Evidence Update Cover Letter (January 29,2024)

² Pleas see 2A-Staff-104 and 1B-SEC-01

Toronto Hydro-Electric System Limited EB-2023-0195 Interrogatory Responses 1A-Staff-1

FILED: March 11, 2024

Page **2** of **2**

- the 2023 load and customer actuals and updated 2024-2029 forecast;
- the January 29, 2024 evidence update as noted in the accompanying cover letter;
- 3 (iv) any other material updates or corrections identified in interrogatory responses;

4

- 5 As noted in the January 29, 2024 cover letter, in advance of the Technical Conference, the utility
- also intends to update the value of the Performance Incentive Mechanism (PIM) in Exhibit 1B, as
- 7 the PIM is a function of the utility's 2025-2029 total revenue requirement. In addition, Toronto
- 8 Hydro will file the 2023 actual results related to performance measures identified in Exhibit 1B, Tab
- 9 3, Schedule 1 (Performance Outcomes Framework) and Schedule 3 (Historical Performance
- 10 Results).

11 12

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QUESTION (B):

b) In addition, please file an updated set of models that reflects the interrogatory responses.
 Please ensure the models used are the latest available models on the OEB's 2024 Electricity
 Distributor Rate Applications webpage.

15 16

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RESPONSE (B):

- 18 The OEB models filed as part of this rate application and subsequent updates include a number of
- modifications made to reflect the utility's specific considerations. Updating these models to the
- 20 latest version would require a significant effort, which would not provide commensurate value at
- this stage of the proceeding based on Toronto Hydro's understanding that there are have only
- been minor changes from the previous version that the utility used when the application was filed.
- 23 Where applicable, Toronto Hydro proposes to update the models at the time of the Draft Rate
- 24 Order.

Toronto Hydro-Electric System Limited EB-2023-0195 Interrogatory Responses 1A-Staff-2 FILED: March 11, 2024 Page 1 of 1

RESPONSES TO ONTARIO ENERGY BOARD STAFF INTERROGATORIES

2

1

- 3 INTERROGATORY 1A-STAFF-2
- 4 Reference: Chapter 2 Filing Requirements, Page 3 (update for 2024 FRs)

5

- 6 QUESTION:
- 7 As required in the Chapter 2 Filing Requirements, please provide a summary of any updates or
- 8 amendments to an OEB model to accommodate Toronto Hydro's circumstance, if applicable.

9

- 10 **RESPONSE**:
- 11 Please see Toronto Hydro's response to interrogatory 1A-Staff-1.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

2

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INTERROGATORY 1A-CCC-1

4 Reference: Exhibit 1A

5

- 6 Please file all materials provided to Toronto Hydro's Board of Directors with respect to this
- 7 Application, the underlying budgets and THESL's most recent Business Plan.

8

9

RESPONSE:

- 10 Please refer to the appendices to this response for the following materials:
- Appendix A Toronto Hydro's 2023-2025 Business Plan
- Appendix B Toronto Hydro's 2024-2026 Business Plan
 - Appendix C 2025 Rate Application Strategy & Update
 - Appendix D Customer Engagement & Rate Application Update

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- Please note that some parts of these documents have been redacted for confidentiality purposes.
- Also, certain information in these documents is subject to solicitor-client privilege, or is not
- relevant to answering the question above, and has been permanently redacted in both the public
- and confidential versions of these documents.

2025-2029 REGULATORY STRATEGY AND 2023-2025 BUSINESS PLAN

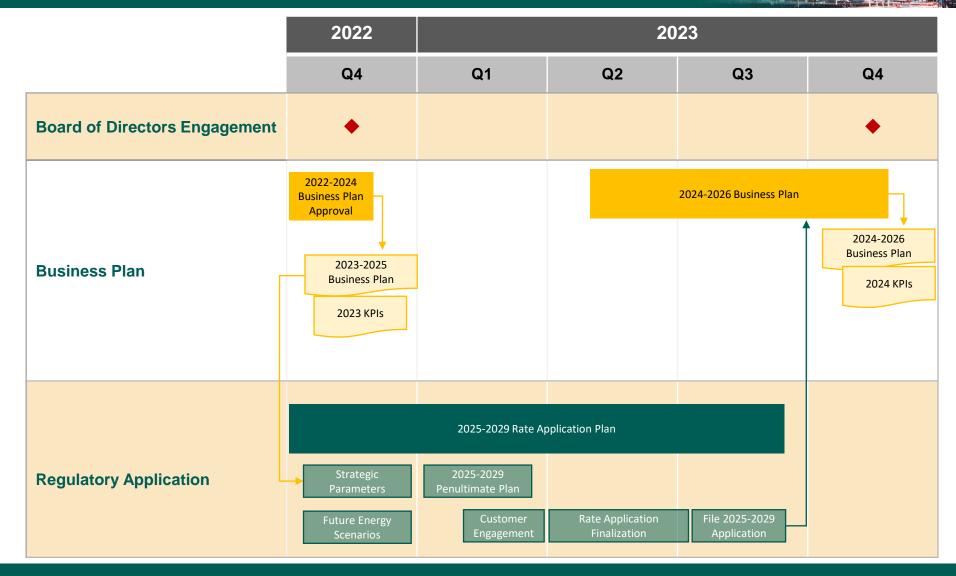
FB-2023-0195 FILED: March 11, 2024

Toronto Hydro-Electric System Limited

TORONTO

This record has been prepared by and under the supervision of Toronto Hydro's senior management team for the purposes of providing advice and recommendations to the institution. It contains sensitive commercial information, including material facts, material changes and/or pending policy decisions, regarding the institution that have not yet been put into operation or made public. Any unauthorized or premature disclosure of this information will prejudice Toronto Hydro's economic interests, financial interests, legal interests and competitive position. In addition, any such disclosure could give rise to a breach of law, including applicable securities laws. Any unauthorized disclosure is strictly prohibited.

PLANNING TIMELINE.



AGENDA

- 1 2025-2029 Regulatory Strategy
- **2023-2025 Business Plan**
- Regulatory, Compliance and Risk Assessment for 2023-2025 Business Plan
- **4** 2023 Corporate Performance Scorecard

3 | 2023-2025 Business Plan Privileged & Confidential Toronto Hydro



GRID & OPERATIONS PLANS

2025-2029 INVESTMENT DRIVERS



System Stewardship: Grid & Operational Performance



Continue to deliver safe and reliable/resilient service

Modernization



Adopt technology to modernize our grid and operations

City Growth & Electrification



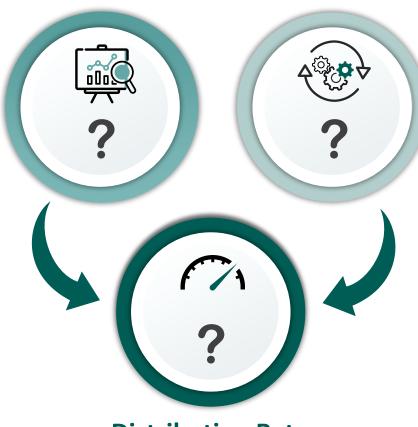
Connect and serve growing demand

RATE APPLICATION STRATEGIC PARAMETERS.



Capital Plan

2025-2029 Capital Expenditures



Distribution Rates

Average Annual Residential Rate Increase (2025-2029)

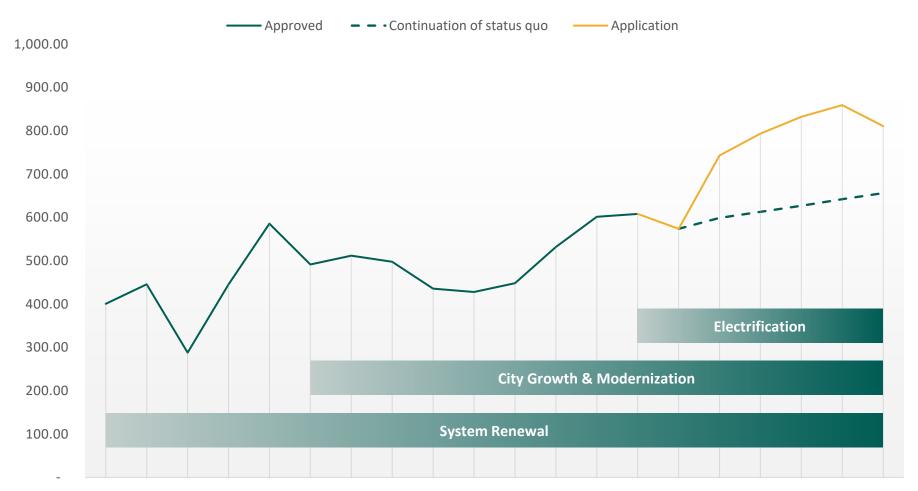
Operations Plan

2025-2029 OM&A Expenses



STRATEGIC PARAMETERS

CAPITAL FUNDING _



2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029

SUSTAINMENT

OBJECTIVES

PLAN OBJECTIVES & HIGHLIGHTS

- Maintain overall health demographics of the asset population in 2025-2029
- Ensure investment pacing contributes to stable longterm investment profiles (2030+) for all assets
- Adhere to previous commitments for **safety and environmental compliance activities** (e.g. PCBs by 2025; Box Conversion by 2026)
- Maintain recent historical system reliability.
- Optimize the pace of renewal investment from year-toyear (cost control) using improved risk-based decisionmaking tools.

			_	
Outcome.	Goal	2025-2029 Status Quo Option	2025-2029 Business Plan	2025-2029 Enhanced Option
Total Expenditures*		\$1,269.2	\$1,577.9	\$1,976.1
SAIFI	•			
SAIDI	>			
Assets Past Useful Life	•			
Asset Health	>			
Oil Spills cont. PCBs				
System Safety Risk	A			•

^{*}Total expenditures exclude allocations such as EAR & AFUDC

Exceed (improved)

Achieve (stable)

At Risk (caution)

GROWTH

OBJECTIVES

PLAN OBJECTIVES & HIGHLIGHTS

- Connect customers efficiently and with consideration for a likely increase in connections volumes due to electrification
- Expand stations capacity to alleviate future load constraints, with consideration for increased EV uptake, decarbonization drivers, and other growth factors (digitization and redevelopment).
- Optimize near-term system capacity through load transfers, bus balancing, cable upgrades and the targeted use of non-wires alternatives such as demand response and energy efficiency.
- Alleviate constraints on restricted feeders to accommodate increasing DER connections.
- Install control and monitoring capabilities for all generators > 50kW
- Accommodate relocations for committed third-party developments, including priority transit projects

Outcome	Goal	2025-2029 Status Quo Option	2025-2029 Business Plan	2025-2029 Enhanced Option
Total Expenditures*		\$861.3	\$940.5	\$1,109.5
Load Capacity			•	
Hosting Capacity	A	•	•	•
Obligation to Serve	•		•	
Operational Flexibility	A		•	

^{*}Total expenditures exclude allocations such as EAR & AFUDC

Achieve (stable)

At Risk (caution)

Exceed (improved)

MODERNIZATION

OBJECTIVES

PLAN OBJECTIVES & HIGHLIGHTS

- Prioritize investments that will deliver demonstrable benefits to customers, especially enhancements that will enhance value-for-money in the long-term (i.e. efficiency)
- Improve system reliability through enhanced fault management, leveraging automation and advanced metering (AMI2.0)
- Enhance system observability across the system, enabling better asset management and operational decision making
- Leverage technology to improve customer experience (e.q. reliability, power quality, customer tools, DER integration)
- Enhance **resiliency** and **security** of the system through advanced grids, targeted undergrounding of critical overhead assets, and enhancements to distribution schemes for critical loads downtown.

Outcome	Goal	2025-2029 Status Quo Option	2025-2029 Business Plan	2025-2029 Enhanced Option
Total Expenditures*		\$427.3	\$518.6	\$715.5
SAIFI			•	
SAIDI				
Customer Experience			•	
System Observability	A		•	
Operational Flexibility		•	•	
System Resiliency	A		•	
Operational Efficiency				

^{*}Total expenditures exclude allocations such as EAR & AFUDC

Exceed (improved)

Achieve (stable)

At Risk (caution)

GENERAL PLANT

OBJECTIVES

PLAN OBJECTIVES & HIGHLIGHTS

Fleet & Facilities:

- Implement Toronto Hydro's NZ40 strategy:
 - Achieve 80% buildings emissions reductions by 2040
 - > Expand fleet electric vehicle charging infrastructure and electrify 40% of fleet by 2029
- Improve stations site conditions and physical security to meet legislative requirements (OBC, OHSA, CSF, etc.)
- Replace critical facilities assets in poor condition

IT/OT:

- Support Utility of the Future objectives re Grid Modernization, Process Automation & Customer Experience objectives
- > Minimize reliability and cybersecurity risks
- Ensure IT infrastructure is available and reliable with minimal service disruption

Outcome	Goal	2025-2029 Status Quo Option	2025-2029 Business Plan	2025-2029 Enhanced Option
Total Expenditures*		\$480.8	\$613.4	\$665.3
Asset Condition & Reliability	•		•	
Emissions Reductions	A	•		•
Security & Resiliency			•	•
Grid Modernization	A		•	
Process Automation			•	
Customer Experience	A			

^{*}Total expenditures exclude allocations such as EAR & AFUDC

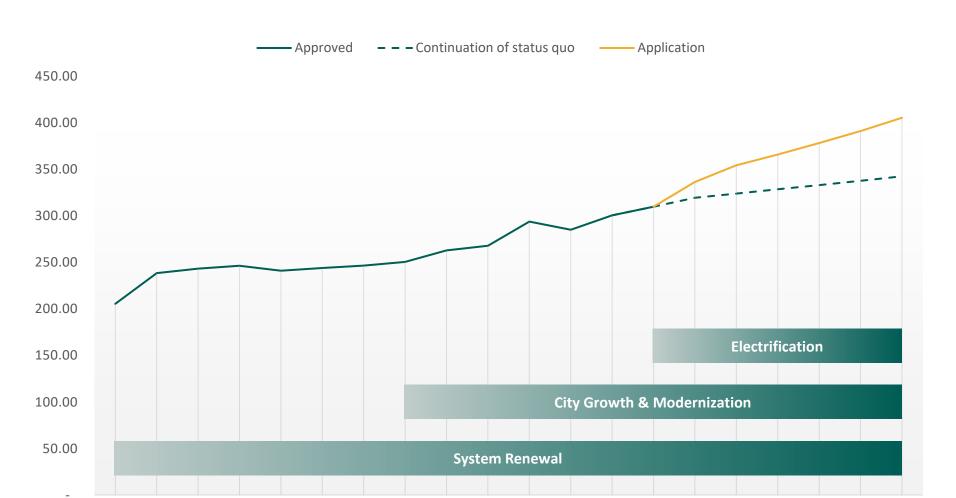
Exceed (improved)

Achieve (stable)

At Risk (caution)



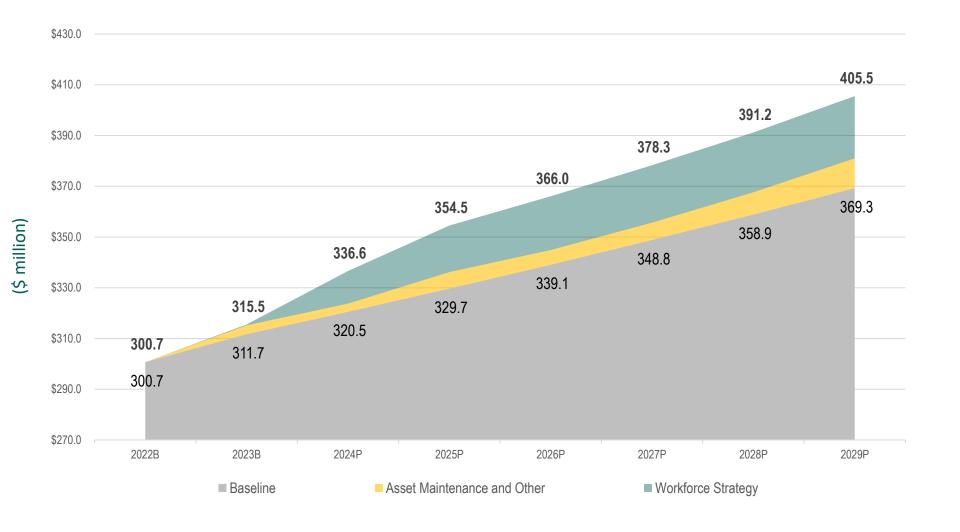
REGULATORY APPROVALS OPERATIONAL FUNDING __



2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029

STRATEGIC PARAMETERS

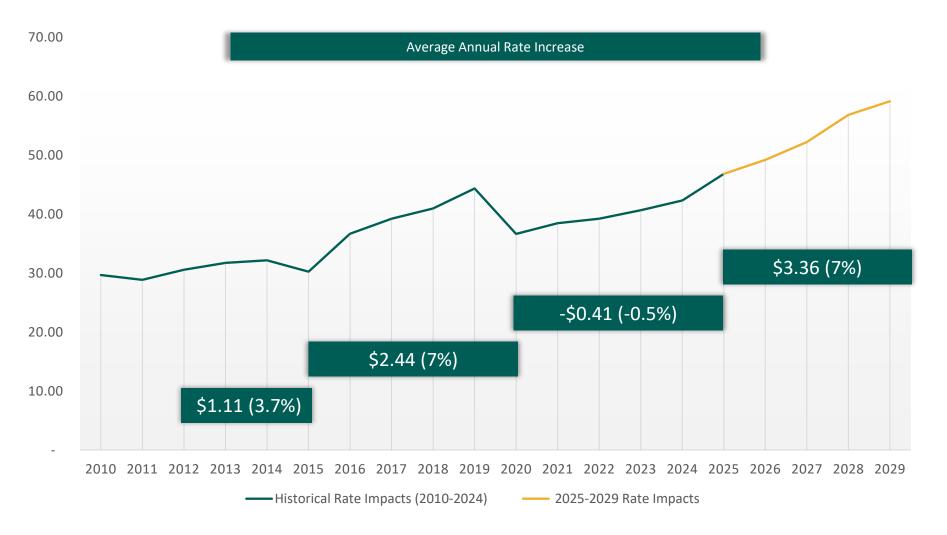
OPERATIONAL PLAN _____





RATE APPLICATION RESIDENTIAL RATE IMPACTS





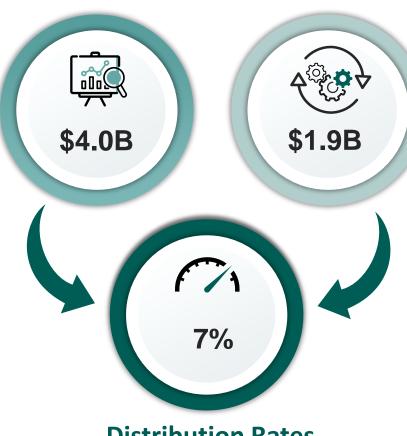
RATE APPLICATION STRATEGIC PARAMETERS WITH RATE **FRAMEWORK**



Capital Plan

2025-2029 Capital Expenditures

Performance Incentive 0.5% ROE



Distribution Rates

Average Annual Residential Rate Increase (2025-2029)

Operations Plan

2025-2029 OM&A Expenses

Performance Incentive 0.3% Stretch Factor



INTEGRATED BUSINESS PLAN



BUSINESS NEEDS

Identification of Capital Investment and Operational needs that underpin the Corporate Pillars







CORPORATE STRATEGY

Modernization and Electrification

Alignment to Utility of the Future and Climate Action

PEOPLE STRATEGY Workforce of Tomorrow

Build a culture of safety, sustainment and innovation that propels TH into the future



Consideration of compliance requirements and related mitigating actions







REGULATORY ALIGNMENT

- 2023-2024: Alignment to 2020-2024 OEB decision and inclusion of new emerging issues (e.g.: customer connections, inflation)
- 2025: Alignment to 2025-2029 rate application strategy

RISK ALIGNMENT

Ensure the Business Plan is grounded in ERM assessments and mitigation plans



BUSINESS PLAN ASSUMPTIONS -



The 2023-2025 Business Plan incorporates the following:

- Alignment to the 10-year Utility of the Future strategy and strategic priorities including Climate Action;
- 2020-2024 CIR decision and inclusion of new emerging issues (e.g.: increase in customer connections and incremental inflationary costs);
- 2025 aligned to 2025-2029 rate application strategy;
- Long-term economic impact resulting from COVID-19;

LEGAL ENTITIES



THC

Corporate

THESL

- Regulated
- Electricity Distribution

THESL

- Unregulated
- Climate Advisory Services and Energy Solutions

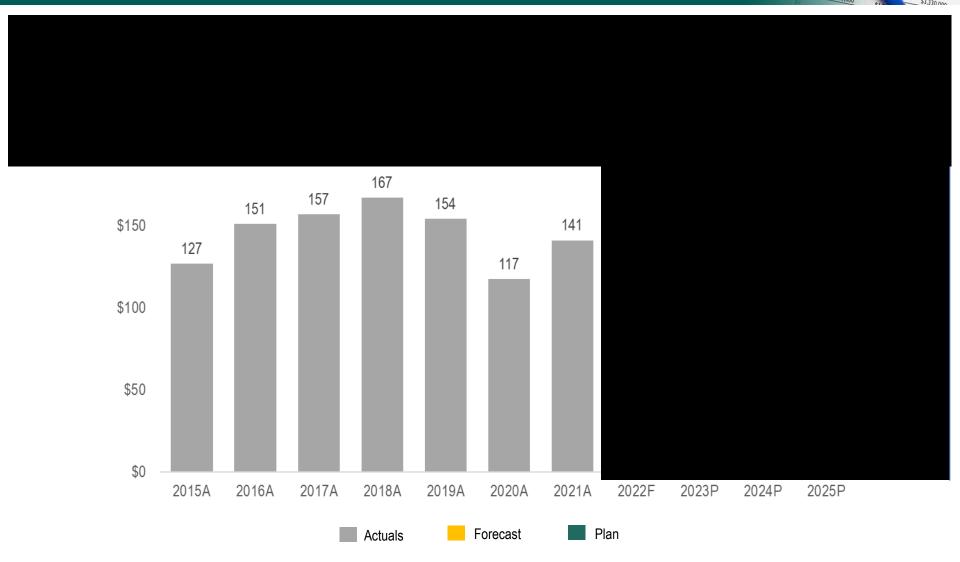
THESI

- Unregulated
- Street Lighting



NET INCOME COMPOUNDED ANNUAL GROWTH RATE





2023 STATEMENTS OF INCOME

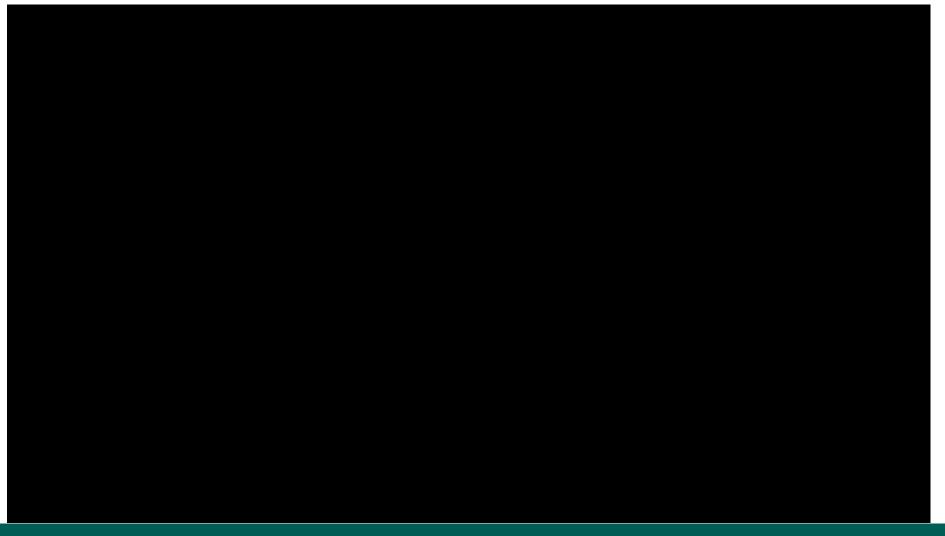
CONSOLIDATED.



Statements of Income				
In millions of Canadian dollars	Corporate	Regulated	Unregulated	Consolidated
For the year ending December 31, 2023				
Energysales		2,988		
Distribution revenue		827		
Other revenues		87		
Total revenues		3,902		
Energy purchases		2,988		
Operating expenses		331		
Depreciation and amortization		267		
Total expenses		3,586		
Finance costs		99		
Gain on disposals of property, plant and equipment		1		
Income/(loss) before income taxes		218		
Income tax (expense)/recovery		45		
Net movements in regulatory balances		(71		
Net movements in regulatory balances arising from deferred taxes		50		
Net income after net movements in regulatory balances		152		

NET INCOME - 2023 BUDGET -







2023 STATEMENTS OF INCOME

CORPORATE -







2023 STATEMENT OF INCOME REGULATED

Statements of Income				
In millions of Canadian dollars	Corporate	Regulated	Unregulated	Consolidated
For the year ending December 31, 2023				
Energy sales		2,988		
Distribution revenue		827		
Other revenues		87		
Total revenues		3,902		
Energy purchases		2,988		
Operating expenses		331		
Depreciation and amortization		267		
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Gain on disposals of property, plant and equipment		1		
Income/(loss) before income taxes		218		
Income tax (expense)/recovery		45		
Net movements in regulatory balances		(71)		
Net movements in regulatory balances arising from deferred taxes		50		
Net income after net movements in regulatory balances		152		



Total Revenues

REVENUES ———			<u>l</u>			"
	2021	2022	2022	2023	Variance	
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance	
Distribution Revenue	759	750	750	827	77	
Other Revenues	86	84	85	87	2	

➤ Higher Distribution Revenue due to the recovery of regulatory settlement variances, which are offset in net movement line, and increase in distribution rates in 2023 resulting from the 2020-2024 regulatory decision

845

834

835

914

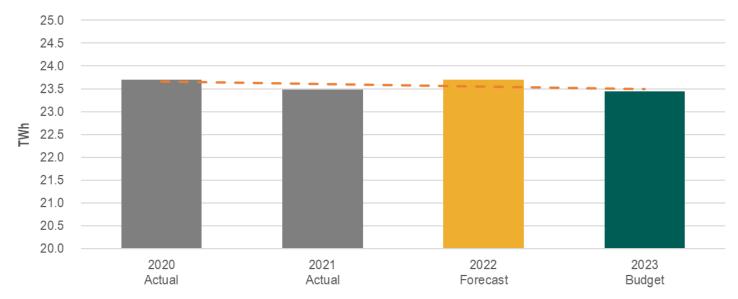
79

Increase in Other Revenues primarily due to higher late payment fees and customer demand work

LOAD FORECAST



	2021	2022	2022	2023
	Actual	Budget	Forecast	Budget
Load (TWh) ¹	23.5	23.7	23.7	23.4
Year over Year % Change	(1%)	0%	1%	(1%)



Loads over the 2018-2022 period exhibit an overall declining trend as customer growth is offset by declining average use per customer primarily driven by conservation activities

¹ Wholesale Purchase Load

ENERGY PURCHASES



	2021	2022	2022	2023
In millions of Canadian dollars	Actual	Budget	Forecast	Budget
Commodity Charges	2,333	2,496	2,429	2,424
Transmission Charges	335	363	378	391
Wholesale Service Charges	96	80	162	161
Rural Rate Assistance	12	12	12	12
Total Energy Purchases	2,776	2,951	2,981	2,988
Total \$/kWh	0.1182	0.1245	0.1236	0.1275

Energy Purchases are a pass-through and are collected through Revenue as Energy Sales

OTHER REVENUES



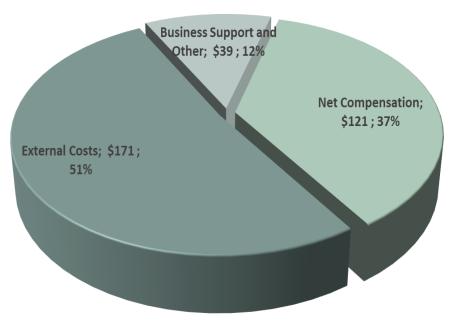
	2021	2022	2022	2023	Variance
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance
Pole, Ducts and Other Rentals	18	21	21	21	-
Customer Demand Work	18	16	16	17	1
Reclaimed Materials	15	8	12	12	-
Street Lighting	9	10	9	9	-
Subtotal Customer Demand Work	60	55	58	59	1
Customer Charges	7	6	7	7	-
Late Payment Charges	2	3	3	4	1
Capital Contribution	12	17	16	16	-
Regulatory Deferral Accounts	4	1	-	-	-
Other	1	2	1	1	-
Total Revenues	86	84	85	87	2

Increase in Other Revenues primarily due to higher late payment fees and customer demand work

OPERATING

EXPENSES





	2021	2022	2022	2023	Variance
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance
Net Compensation	108	118	106	121	15
External Costs	152	157	162	171	9
Business Support and Other	48	41	35	39	4
Total Operating Expenses	308	316	303	331	28

NET COMPENSATION -

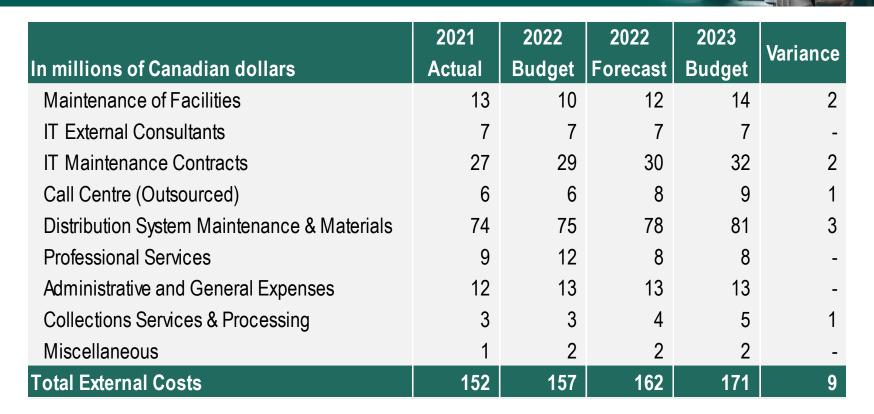


	2021	2022	2022	2023	Variance
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance
Payroll	165	178	171	192	21
Benefits	41	47	42	49	7
Capitalization	(98)	(107)	(107)	(120)	(13)
Net Compensation	108	118	106	121	15

> Increase in net compensation costs due to increase in number of headcount

EXTERNAL

COSTS



Increase in External Costs due to ramp-up of the distribution system maintenance program, Cyber and Physical security programs.

BUSINESS SUPPORT &	
OTHER COSTS	

In millions of Consdian dellars	2021	2022	2022	2023	Variance
In millions of Canadian dollars	Actual	Buaget	Forecast	Budget	
Utilities and Communication	6	7	8	8	-
Office Supplies and Postage	6	7	7	7	-
Employee Expenses	1	2	2	2	-
Rental and Leases	1	1	1	1	-
Bad Debt	7	5	2	5	3
OEB Fees	3	4	4	4	-
Insurance	5	6	6	6	-
Property Taxes and Other	5	5	5	5	-
Ancillary Services Costs	33	23	24	25	1
Capitalization, Allocation and Other	(19)	(19)	(24)	(24)	-
Total Business Support Costs	48	41	35	39	4

Higher Business support and other costs due to increase in bad debt expense. 2022 Forecast reflects the reversal of \$3.0M of COVID related bad debt expense.

DEPRECIATION & AMORTIZATION —

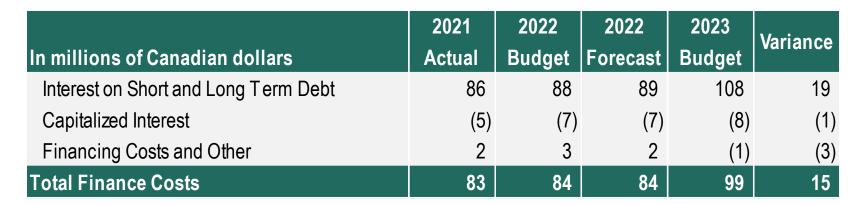


	2021	2022	-		Variance
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance
Total Depreciation and Amortization	288	300	303	267	(36)

Decrease in depreciation and amortization expenses due to change in assets useful life as a result of new depreciation study

FINANCE

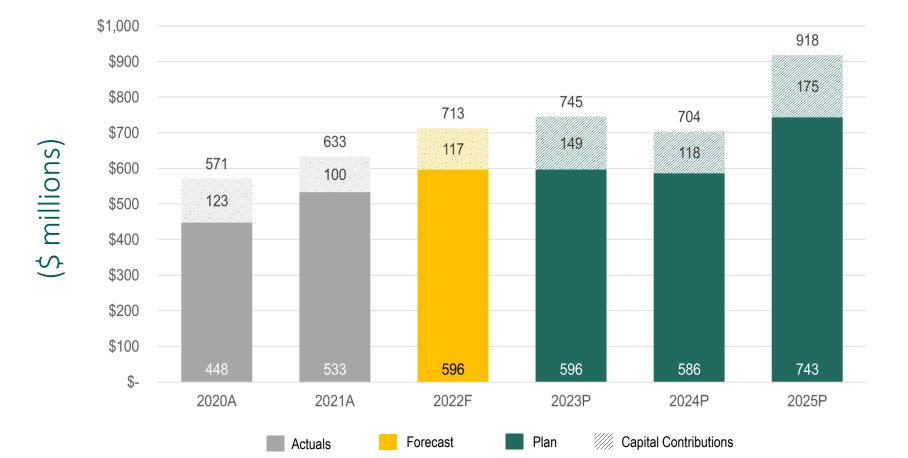
COSTS



- 2022 Forecast updated for 30 year debenture issued October 13, 2022 for \$300M at 4.95%
- 2023 Budget includes a \$250M debt replacement and \$200M new debenture to be issued on July 1st, 2023 at 5.45%

CAPITAL EXPENDITURES (GROSS vs NET*)





^{*}Net of capital contributions received

CAPITAL EXPENDITURES

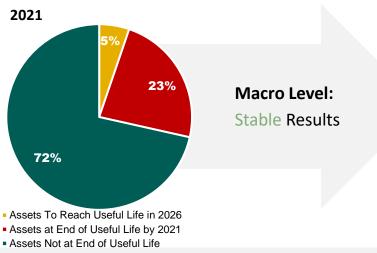


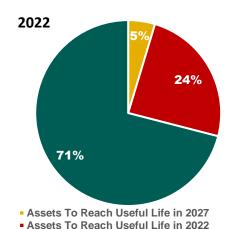
In millions of Canadian dollars	2021 Actual	2022 Budget	2022 Forecast	2023 Budget	Variance
Infrastructure Renewal	268	319	334	347	13
Reactive Capital	43	46	40	43	3
Customer Connections	125	98	117	140	23
Hydro One Contributions	20	26	22	17	(5)
Copeland Transformer Station	35	25	25	11	(14)
IT, Fleet and Facilities	73	101	104	94	(10)
Externally Initiated Plant Relocations & Expansions	68	94	67	84	17
Provincial Allocations and Other	1	7	4	9	5
Gross Capital Expenditures	633	716	713	745	32
Capital Contributions	(100)	(142)	(117)	(149)	(32)
Net Capital Expenditures	533	574	596	596	-

SYSTEM **RENEWAL**



Leading Indicator: Assets Past Useful Life (Age)



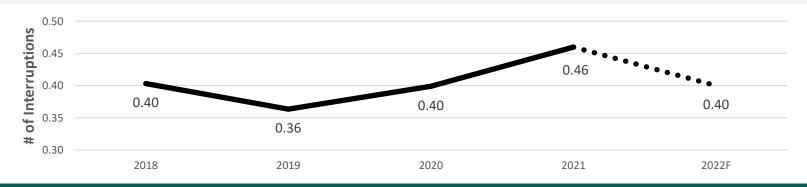


Assets Not at End of Useful Life

Micro Level:

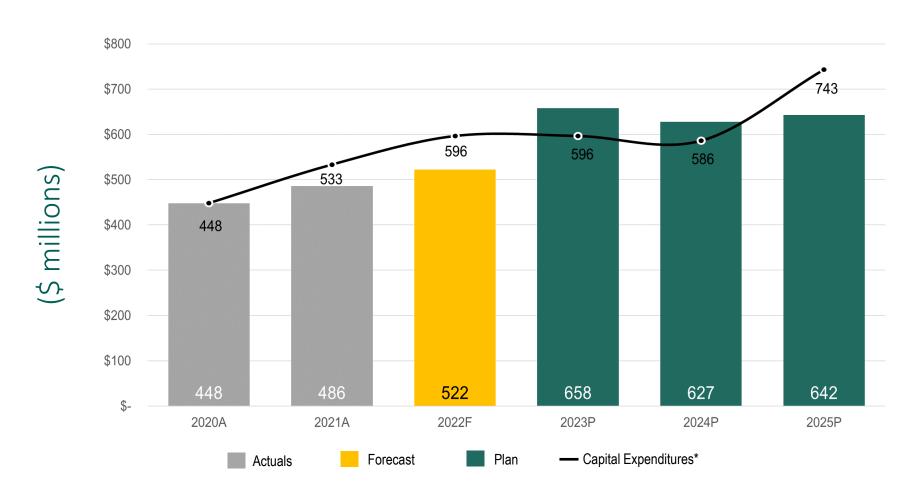
Slight deterioration for some asset types (e.g. underground cable). Similar deterioration for some asset condition results.

Lagging Indicator: System Average Interruption Frequency Index (SAIFI-Defective)



IN-SERVICE ADDTIONS* AND CAPITAL EXPENDITURES ___





^{*} Net of capital contributions received



2023 STATEMENT OF INCOME UNREGULATED _____



Statements of Income	
In millions of Canadian dollars	Regulated
For the year ending December 31, 2023	
Energy sales	2,988
Distribution revenue	827
Other revenues	87
Total revenues	3,902
Energy purchases	2,988
Operating expenses	331
Depreciation and amortization	267
Total expenses	3,586
Finance costs	99
Gain on disposals of property, plant and equipment	1
Income/(loss) before income taxes	218
Income tax (expense)/recovery	45
Net movements in regulatory balances	(71)
Net movements in regulatory balances arising from deferred taxes	50
Net income after net movements in regulatory balances	152

OTHER REVENUES



OPERATING - EXPENSES -



CAPITAL — EXPENDITURES





CONSOLIDATED - STATEMENTS OF INCOME

\$1,750,000 \$1,500,000	\$500,000 \$175,000 \$325,000 \$325,000 \$77,500	\$3,500,000 \$1,000,000 \$350,000 \$650,000 \$195,000 \$227,500 \$227,500	\$4,375,000 \$4,375,000 \$2,000,000 \$700,000 \$1,300,000 \$390,000 \$455,000 \$455,000
\$0	\$1,238,750 \$250,000	0.000	\$1,500,000

In millions of Canadian dollars	2021 Actual	2022 Budget	2022 Forecast	2023 Budget	2024 Budget	2025 Budget
For the years ended December 31						
Energy sales	2,702	2,951	2,888	2,988	3,066	3,136
Distribution revenue	759	750	750	827	913	891
Other revenues	106	101				
Total revenues	3,567	3,802				
Energy purchases	2,775	2,951	2,981	2,988	3,066	3,136
Operating expenses	323	333				
Depreciation and amortization	293	306				
Total expenses	3,391	3,590				
Finance costs	79	81				
Gain on disposals of property, plant and equipment	3	1	1	1	1	1
Income/(loss) before income taxes	100	132				
Income tax (expense)/recovery	22	40				
Net movements in regulatory balances	54	32	121	(71)	(120)	23
Net movements in regulatory balances arising from deferred taxes	9	32	6	50	50	50
Net income after net movements in regulatory balances	141	156				

53 | 2023-2025 Business Plan Privileged & Confidential Toronto Hydro

CONSOLIDATED BALANCE SHEETS



Consolidated Balance Sheets In millions of Canadian dollars As at December 31	2021 Actual	2022 Budget	2022 Forecast	2023 Budget	2024 Budget	2025 Budget
Assets						
Current						
Accounts receivable	219	281				
Unbilled revenue	240	330				
Other assets	31	36				
Total current assets	490	647				
Property, plant, equipment and intangible assets	5,735	6,179				
Other assets	7	5				
Total assets	6,232	6,831				
Regulatory balances	181	189	267	271	226	272
Total Assets and regulatory balances	6,413	7,020				
Liabilities and Equity						
Current						
Working capital facility and commercial paper	284	269				
Debentures	-	250				
Other liabilities	524	656				
Total current liabilities	808	1,175				
Debentures	2,430	2,380				
Deferred tax liabilities	64	111				
Other liabilities	977	1,144				
Total liabilities	4,279	4,810				
Equity						
Share capital	818	818				
Retained earnings	1,165	1,233				
Total equity	1,983	2,051				
Total liabilities and equity	6,262	6,861				
Regulatory balances	151	159	218	243	268	241
Total liabilities, equity and regulatory balances	6,413	7,020				

CONSOLIDATED STATEMENTS OF CASH FLOWS -

\$1,750,000 \$1,500,000	\$500,000 \$175,000 \$325,000 \$77,500 \$1,500 \$2,738,78	\$3,500,000 \$1,000,000 \$350,000 \$650,000 \$195,000 \$227,500 \$227,500	\$4,375,000 \$4,375,000 \$2,000,000 \$700,000 \$1,300,000 \$390,000 \$455,000
\$0	\$1,238,750	20,000	\$1,500,000

Consolidated Statements of Cashflows	2021	2022	2022	2023	2024	2025
in millions of Canadian dollars	Actual	Budget	Forecast	Budget	Budget	Budget
Year ended December 31	Actual	Duugei	FUIECASI	Duugei	Duugei	Duugei
Operating Activities						
Net income after net movements in regulatory balances	141	156				
Net movements in regulatory balances	(54)	(32)	(121)	71	120	(23)
Net movements in regulatory balances arising from deferred taxes	(9)	(32)	(6)	(50)	(50)	(50)
Depreciation, amortization and other changes	400	416				
Capital contribution received	101	147	119	149	118	175
Changes in non-cash operating working capital balances	8	67				
Net cash provided by operating activities	587	722				
Investing Activities						
Purchase of property, plant, equipment and intangible assets	(603)	(722)				
Proceeds on disposal of property, plant, and equipment	3	1	1	1	1	1
Net cash used in investing activities	(600)	(721)				
Financing Activities						
Increase (decrease) in commercial paper, net	115	(40)				
Dividends paid	(70)	(79)				
Proceeds from issuance of debentures net of debt issuance costs paid	348	199				
Repayment of debentures	(300)	-				
Interest paid	(82)	(81)				
Net cash provided by (used in) financing activities	11	(1)				
Net change in cash and cash equivalents during the year	(2)	-				
Working capital facility, beginning of year	(6)	-				
Working capital facility, end of year	(8)					



SUBJECT TO APPROVAL AND CHANGES BY THE HUMAN RESOURCES AND ENVIRONMENT COMMITTEE FOR RECOMMENDATION TO THE BOARD



CORPORATE 2022-2023 SCORECARD -

Pillar	КРІ	2022 Weight	2023 Weight	Pillar Weight
Customer	New Services Connected on Time	5%	5%	Customer 15%
	Estimated Time of Restoration	5%	5%	
	First Contact Resolution	5%	5%	
People	Total Recordable Injury Frequency	10%	10%	People
	Employee Engagement	5%	5%	15%
Env.	Building Emissions Reduction	5%	5%	Environmer 10%
	Fleet Electrification	5%	5%	
SAIFI SAIDI	SAIFI	10%	10%	Operations
	SAIDI	10%	10%	20%
Financial	In-Service Assets	10%	10%	
	Cash Flow Management	5%	-	Finance 40%
	Consolidated Net Income	25%	30%	

100%

100%

CONTINUOUS IMPROVEMENT FRAMEWORK ____



CUSTOMER



PEOPLE



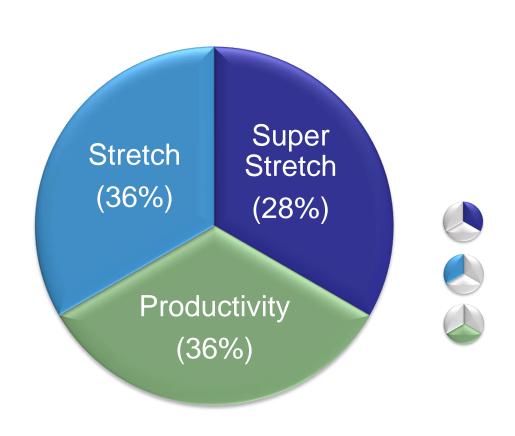
ENVIRONMENT



OPERATIONS



FINANCIAL



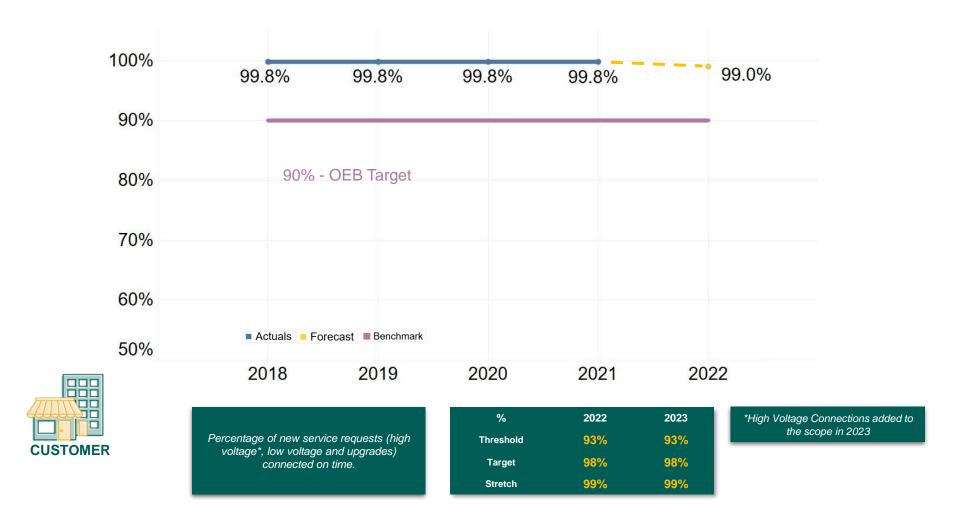


Customer (15%)

- New Services Connected on Time: 5%
- Estimated Time of Restoration (ETOR): 5%
- First Contact Resolution: 5%

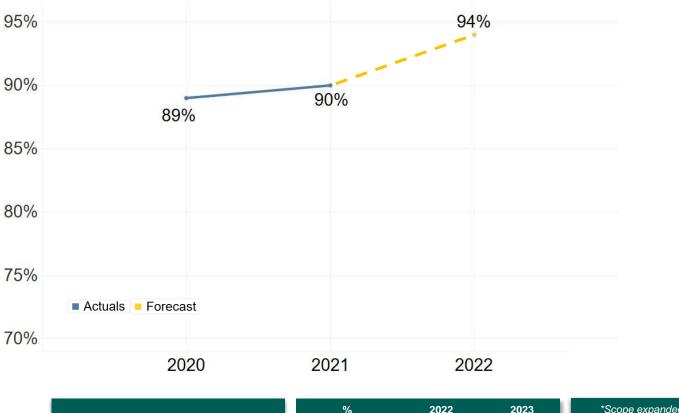


NEW SERVICES CONNECTED ON TIME (5%)





ESTIMATED TIME OF RESTORATION (ETOR) (5%) -





A composite measure of the percentage of power outages* that are assigned an Estimated Time of Restoration (ETOR) within 60 minutes and the accuracy of ETORs within +/- 120 minutes

 %
 2022
 2023

 Threshold
 80%
 80%

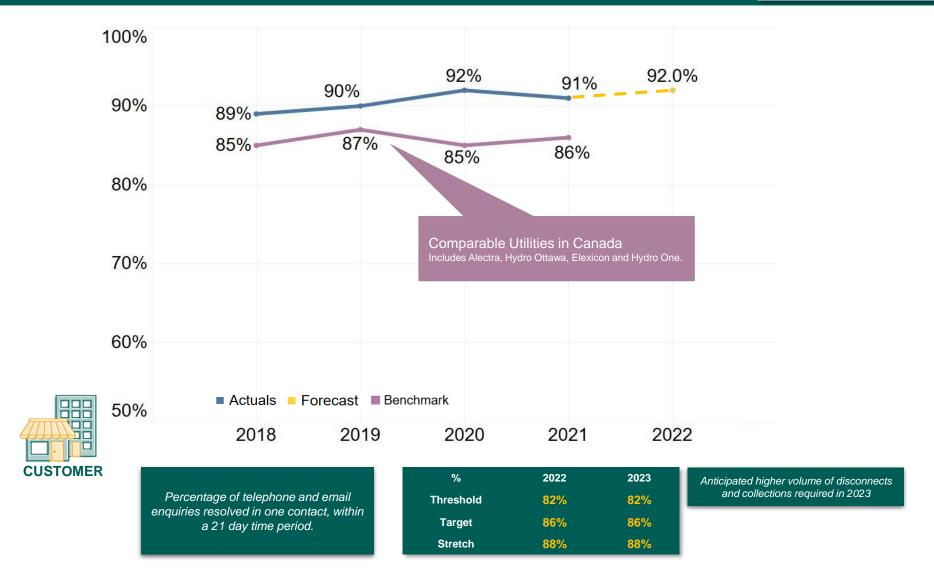
 Target
 85%
 85%

 Stretch
 90%
 90%

*Scope expanded to provide accurate and timely ETORs for all events on Outage Map.



FIRST CONTACT RESOLUTION (5%)



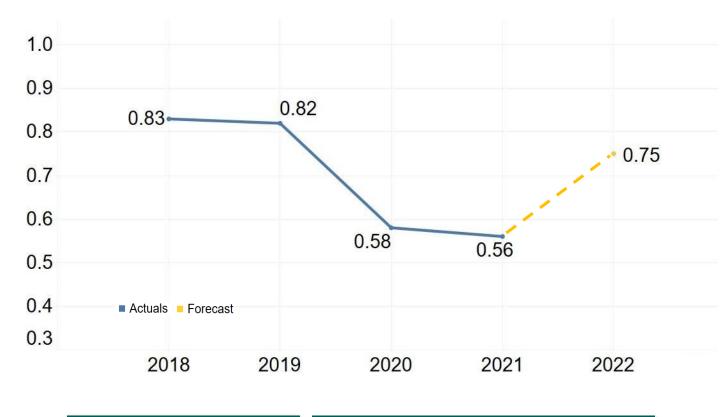


People (15%)

- Total Recordable Injury Frequency: 10%
- Employee Engagement: 5%



TOTAL RECORDABLE INJURY FREQUENCY (10%)



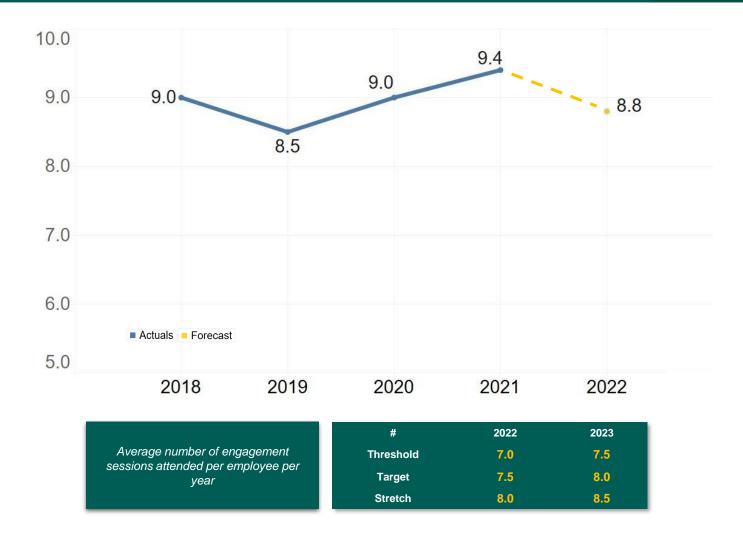


Total Recordable Injury Frequency Rate, as per Electricity Canada Standard.

#	2022	2023
Threshold	1.15	1.05
Target	1.10	1.00
Stretch	1.05	0.95



EMPLOYEE ENGAGEMENT (5%)





PEOPLE

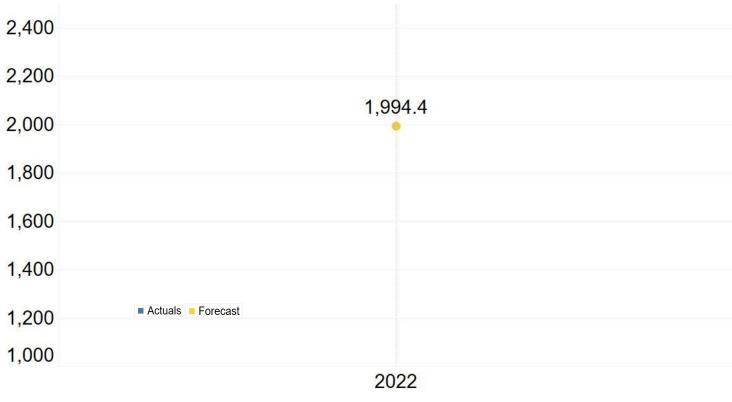


Environment (10%)

- Building Emissions Reduction: 5%
- Fleet Electrification: 5%

Stretch

BUILDING EMISSIONS REDUCTION (5%)



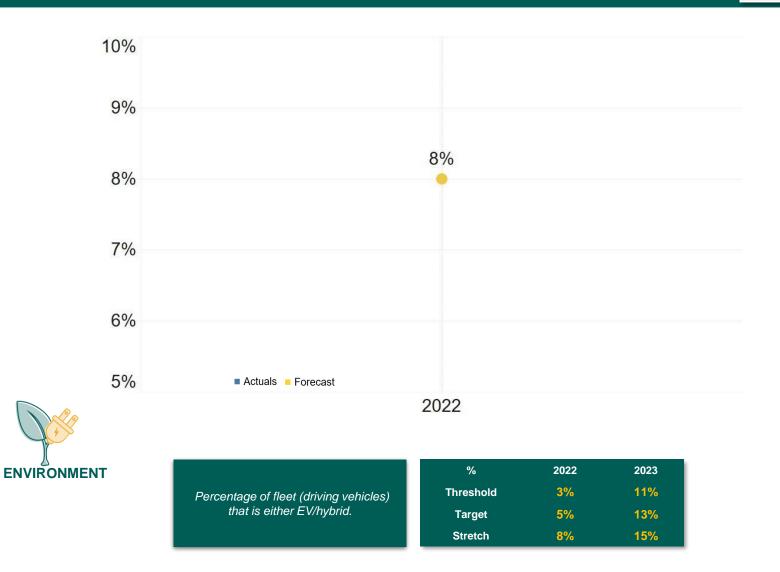


Emissions from Toronto Hydro occupied work centres

tCO2e	2022	2023
Threshold	2235.7	2213.6
Target	2213.6	2191.5
Stretch	2191.5	2145.8



FLEET ELECTRIFICATION (5%)



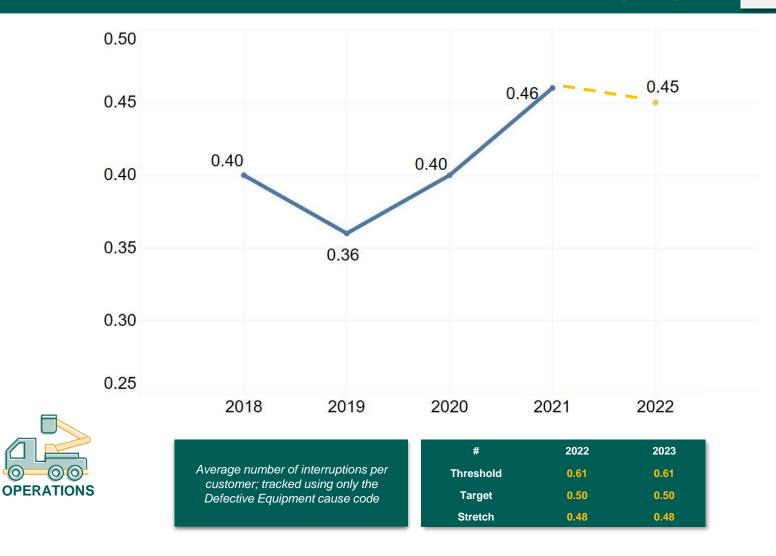


Operations (20%)

- Outage Frequency (SAIFI): 10%
- Outage Duration (SAIDI): 10%

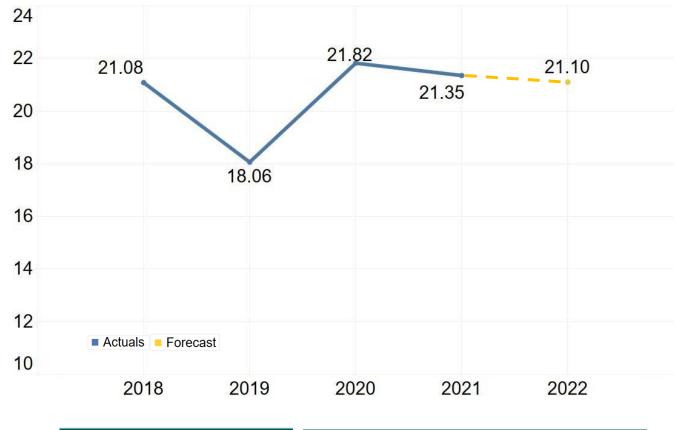


OUTAGE FREQUENCY - DEFECTIVE EQUIPMENT (10%)





OUTAGE DURATION – DEFECTIVE EQUIPMENT (10%)





Average outage duration for each customer served; tracked using only the Defective Equipment cause code

Min	2022	2023
Threshold	32.20	32.20
Target	26.47	26.47
Stretch	25.23	25.23



Financial (40%)

• In-Service Assets: 10%

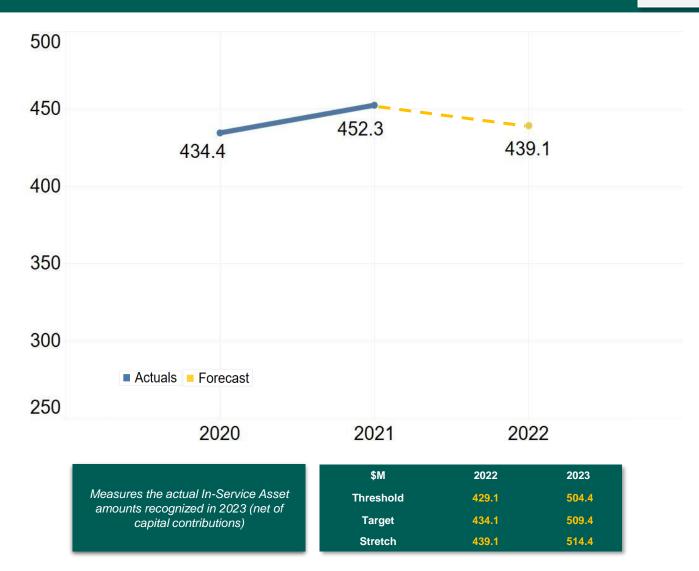
• Consolidated Net Income: 30%



Toronto Hydro

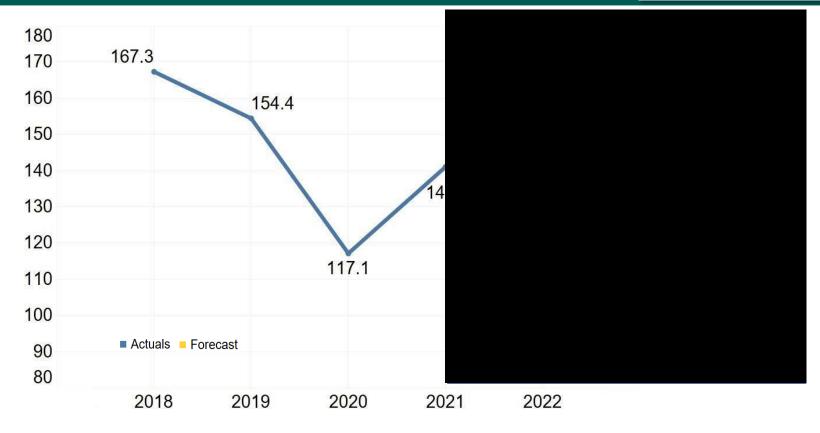
IN-SERVICE ASSETS (10%)

OPERATIONS





CONSOLIDATED NET INCOME (30%)





As per the audited financial statements for the 2023 fiscal year

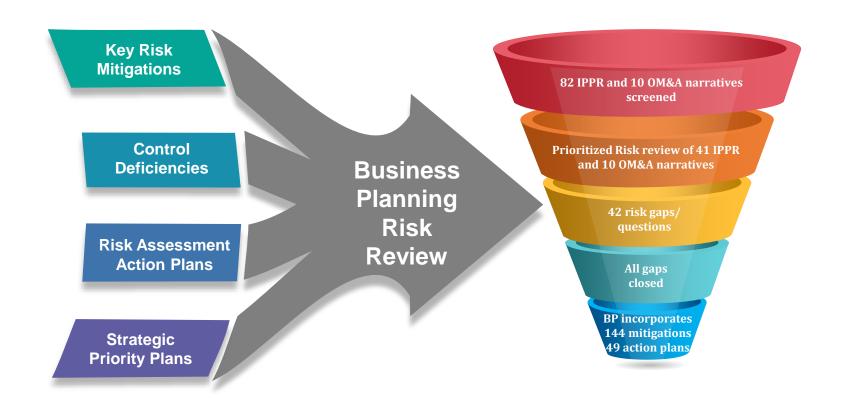
\$M	2022	2023
Threshold		
Target		
Stretch		

Review and recommend for approval to the THC Board via HREC

				2023		
Pillar	KPI	Weight	Threshold	Target	Stretch	Continuous Improvement
er	New Services Connected on Time	5%	93%	98%	99%	
Customer	Estimated Time of Restoration	5%	80%	85%	90%	
ວີ	First Contact Resolution	5%	82%	86%	88%	
People	Total Recordable Injury Frequency	10%	1.05	1.00	0.95	
Peo	Employee Engagement	5%	7.5	8.0	8.5	
>	Building Emissions Reduction	5%	2213.6	2191.5	2145.8	
Env.	Fleet Electrification	5%	11%	13%	15%	
ation	SAIFI	10%	0.61	0.50	0.48	
Operation s	SAIDI	10%	32.20	26.47	25.23	
ıcial	In-Service Assets	10%	504.4	509.4	514.4	
Financial	Consolidated Net Income	30%	128	133	138	
		100%	25%	100%	150%	



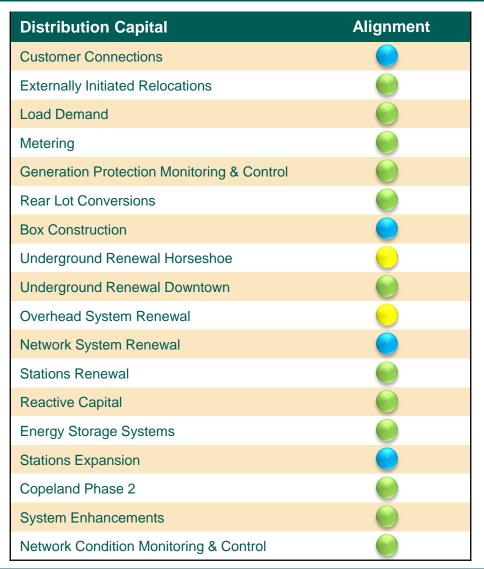
BUSINESS PLAN RISK REVIEW INPUTS & FINDINGS



The Business Plan should support Toronto Hydro's strategic priorities and address the key risk mitigations and action plans identified during the risk assessment.

REGULATORY ALIGNMENT

2020-2024 **DECISION**

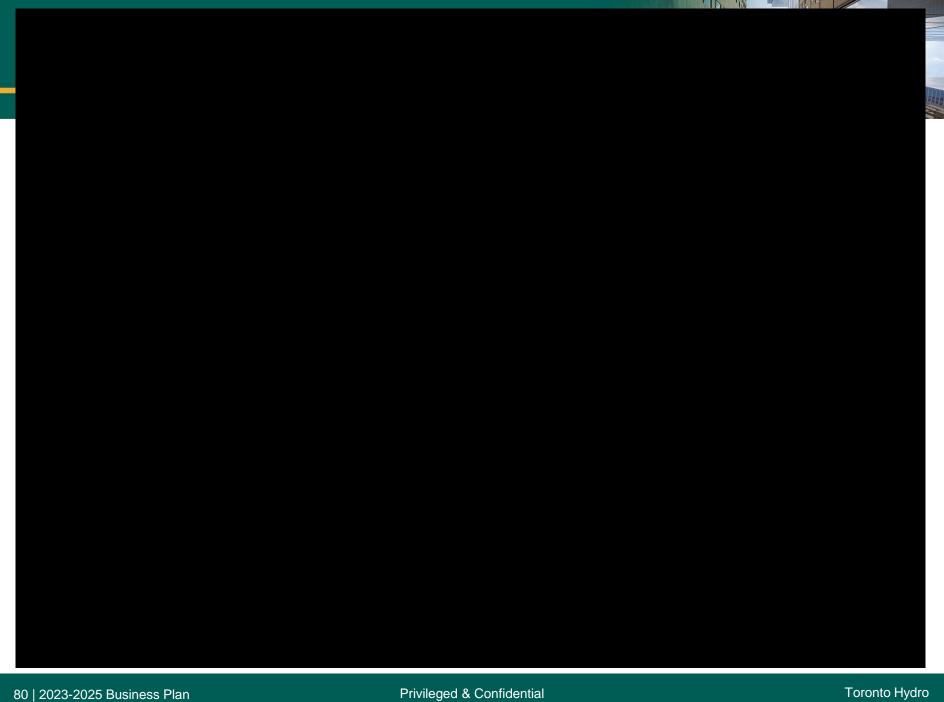


General Plant Capital	Alignment
Fleet	
Facilities	
Information Technology	
Control Center	
ERP Phase 2	
CIS Upgrade	

Operational Plan	Alignment
Distribution Operations	
System Maintenance	
Corporate Services	
Information Technology	
Customer Operations	













Toronto Hydro



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2024-2026 BUSINESS PLAN

November 15th, 2023

This record has been prepared by and under the supervision of Toronto Hydro's senior management team for the purposes of providing advice and recommendations to the institution. It contains sensitive commercial information, including material facts, material changes and/or pending policy decisions, regarding the institution that have not yet been put into operation or made public. Any unauthorized or premature disclosure of this information will prejudice Toronto Hydro's economic interests, financial interests, legal interests and competitive position. In addition, any such disclosure could give rise to a breach of law, including applicable securities laws. Any unauthorized disclosure is strictly prohibited.



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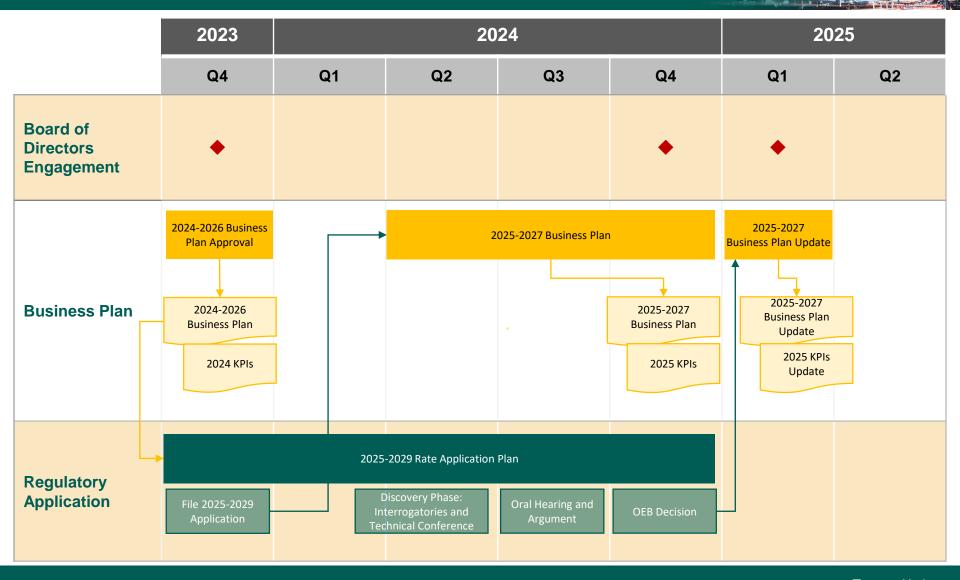
*A registered trademark of Toronto Hydro Corporation used under licence. "Toronto Hydro" means Toronto Hydro-Electric System Limited.

AGENDA

- **1** 2024-2026 Business Plan
- 2 Consolidated Financials
- 3 2024 Budget by Entity
- Regulatory, Compliance and Risk Assessment for 2024-2026 Business Plan
- 5 2024 Corporate Performance Scorecard

2 | 2024-2026 Business Plan Privileged & Confidential Toronto Hydro

PLANNING TIMELINE.



INTEGRATED BUSINESS PLAN



BUSINESS NEEDS

Identification of Capital Investment and Operational needs that underpin the Corporate Pillars







CORPORATE STRATEGY

Modernization and Electrification

PEOPLE STRATEGY Workforce of Tomorrow

Build a culture of safety, sustainment and innovation that propels TH into the future



Consideration of compliance requirements and related mitigating actions







RISK ALIGNMENT

Ensure the Business Plan is grounded in ERM assessments and mitigation plans



Alignment to Utility of the Future and Climate Action

- 2024: Alignment to 2020-2024
 OEB decision and inclusion of new emerging issues (e.g.: customer connections, inflation)
- 2025-2026: Alignment to 2025-2029 rate application strategy



BUSINESS PLAN ASSUMPTIONS -



The 2024-2026 Business Plan incorporates the following:

- Alignment to the 10-year Utility of the Future strategy and strategic priorities including Climate Action;
- 2020-2024 CIR decision and inclusion of new emerging issues (e.g. increase in customer connections, inflationary costs, ramp-up to support electrification);
- Regulated Operations Plan aligned to 2025-2029 rate application strategy and strategic parameters approved by the Board;

RATE APPLICATION STRATEGIC PARAMETERS



Capital Program

2025-2029 Capital Expenditures



Operational Plan

2025-2029 Operational Expenditures

Distribution Rates

2024-2029 Average Annual Residential Rate Increase (smoothed)

LEGAL ENTITIES



THC

Corporate

THESL

- Regulated
- Electricity Distribution

THESL

- Unregulated
- Climate Advisory Services and Energy Solutions

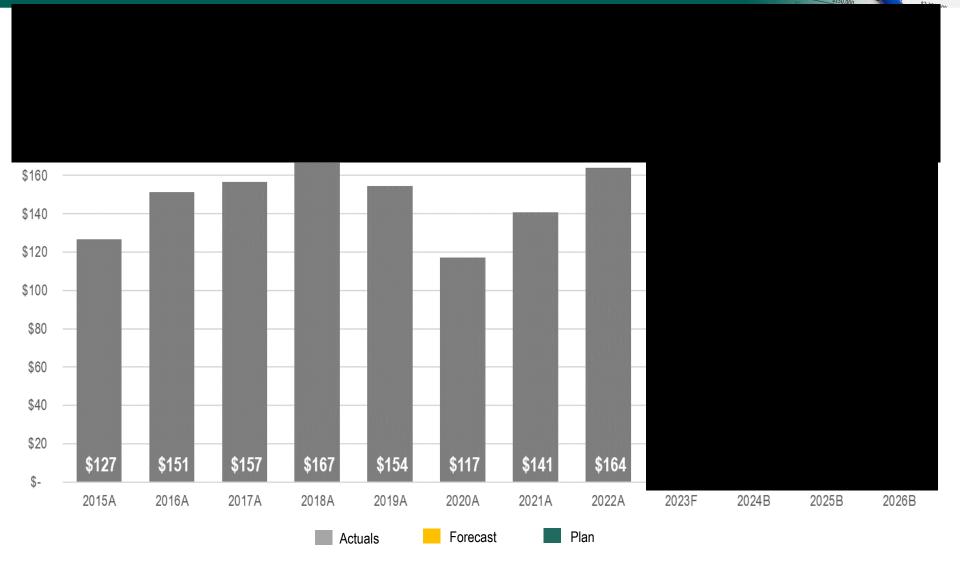
THESI

- Unregulated
- Street Lighting



NET INCOME COMPOUNDED ANNUAL GROWTH RATE





2024 STATEMENTS OF INCOME

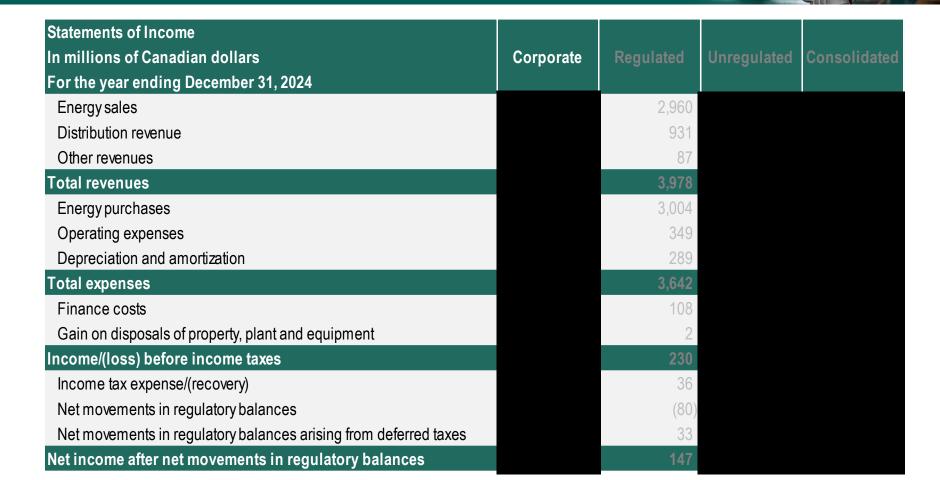
CONSOLIDATED -

Statements of Income				
In millions of Canadian dollars	Corporate	Regulated	Unregulated	Consolidated
For the year ending December 31, 2024				
Energy sales		2,960		
Distribution revenue		931		
Other revenues		87		
Total revenues		3,978		
Energy purchases		3,004		
Operating expenses		349		
Depreciation and amortization		289		
Total expenses		3,642		
Finance costs		108		
Gain on disposals of property, plant and equipment		2		
Income/(loss) before income taxes		230		
Income tax expense/(recovery)		36		
Net movements in regulatory balances		(80)		
Net movements in regulatory balances arising from deferred taxes		33		
Net income after net movements in regulatory balances		147		



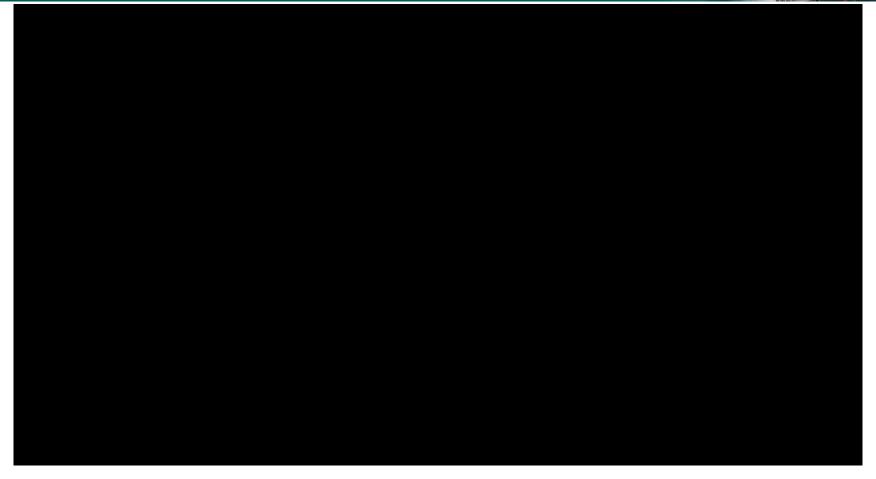
2024 STATEMENTS OF INCOME

CORPORATE -



OPERATING EXPENSES





FINANCE COSTS —





2024 STATEMENT OF INCOME REGULATED _____



Statements of Income				
In millions of Canadian dollars	Corporate	Regulated	Unregulated	Consolidated
For the year ending December 31, 2024				
Energysales		2,960		
Distribution revenue		931		
Other revenues		87		
Total revenues		3,978		
Energy purchases		3,004		
Operating expenses		349		
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Net movements in regulatory balances arising from deferred taxes		33		
Net income after net movements in regulatory balances		147		



Other Revenues

Total Revenues

REVENUES ———						
In millions of Canadian dollars	2022 Actual	2023 Budget	2023 Forecast	2024 Budget	Variance	
Distribution Revenue	754	827	833	931	98	

93

847

87

914

86

919

87

99

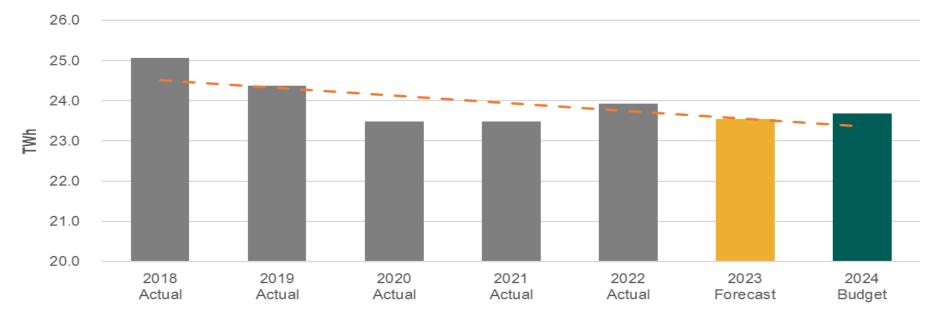
1,018

- Higher Distribution Revenue due to the recovery of regulatory settlement variances, which are offset in net movement line, and increase in distribution rates in 2024 resulting from the 2020-2024 regulatory decision
- Increase in Other Revenues primarily due to higher capital contributions

LOAD FORECAST



		2023		2024
	Actual	Budget	Forecast	Budget
Load (TWh) ¹	23.9	23.4	23.5	23.7
Year over Year % Change	1.9%	(0.2%)	(1.6%)	0.6%



➤ Loads over the 2018-2022 period exhibit an overall declining trend as customer growth is offset by declining average use per customer primarily driven by conservation activities

¹ Wholesale Purchase Load

ENERGY PURCHASES



	2022	2023	2023	2024
In millions of Canadian dollars	Actual	Budget	Forecast	Budget
Commodity Charges	2,320	2,424	2,374	2,461
Transmission Charges	385	391	400	419
Wholesale Service Charges	130	161	109	107
Rural Rate Assistance	12	12	15	17
Total Energy Purchases	2,847	2,988	2,898	3,004
Total \$/kWh	0.1190	0.1275	0.1230	0.1269

Energy Purchases are a pass-through and are collected through Revenue as Energy Sales

OTHER REVENUES



In millions of Canadian dollars	2022 Actual	2023 Budget	2023 Forecast	2024 Budget	Variance
Pole, Ducts and Other Rentals	18	21	19	19	-
Customer Demand Work	26	17	17	17	-
Reclaimed Materials	10	12	12	12	-
Street Lighting	10	9	9	9	-
Subtotal Customer Demand Work	64	59	57	57	
Customer Charges	6	7	6	6	-
Late Payment Charges	3	4	5	5	-
Capital Contributions	17	16	16	17	1
Regulatory Deferral Accounts	2	-	-	-	-
Other	1	1	2	2	-
Total Revenues	93	87	86	87	1

> Increase in Other Revenues primarily due to increase in capital contributions

OPERATING

EXPENSES



Business Support
and Other
\$37M; 11%

External Costs
\$176M; 50%

Net Compensation
\$136M; 39%

	2022	2023	2023	2024	Variance
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance
Net Compensation	104	121	115	136	21
External Costs	159	171	168	176	8
Business Support and Other	43	39	40	37	(3)
Total Operating Expenses	306	331	323	349	26

NET COMPENSATION -



	2022	2023	2023	2024	Variance
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance
Payroll	170	192	192	216	24
Benefits	41	49	44	57	13
Capitalization	(107)	(120)	(121)	(137)	(16)
Net Compensation	104	121	115	136	21

Increase in net compensation costs due to increase in number of headcount

EXTERNAL

COSTS

In millions of Canadian dollars	2022 Actual	2023 Budget	2023 Forecast	2024 Budget	Variance
Maintenance of Facilities	18	14	16	16	-
IT External Consultants	8	7	7	7	-
IT Maintenance Contracts	29	32	31	33	2
Call Centre (Outsourced)	9	9	8	9	1
Distribution System Maintenance & Materials	77	81	83	86	3
Professional Services	6	8	8	9	1
Administrative and General Expenses	8	13	11	11	-
Collections Services & Processing	4	5	4	5	1
Miscellaneous	-	2	-	-	-
Total External Costs	159	171	168	176	8

Increase in External Costs due to ramp-up of the distribution system maintenance programs and IT maintenance and subscription costs.

BUSINESS SUPPORT & OTHER COSTS ———

In millions of Canadian dollars	2022 Actual	2023 Budget	2023 Forecast	2024 Budget	Variance
Utilities and Communication	7	7	7	7	-
Office Supplies and Postage	7	7	7	7	-
Employee Expenses	1	2	2	2	-
Rental and Leases	1	1	1	1	-
Bad Debt	5	5	8	5	(3)
OEB Fees	4	4	5	5	-
Insurance	5	6	6	6	-
Property Taxes and Other	5	5	5	5	-
Ancillary Services Costs	27	25	25	25	-
Capitalization, Allocation and Other	(19)	(23)	(26)	(26)	-
Total Business Support and Other Costs	43	39	40	37	(3)

Lower Business support and other costs due to decrease in bad debt expense. 2023 Forecast reflects the increase in bad debt provision for non-electricity receivables.

DEPRECIATION & AMORTIZATION —



In millions of Canadian dollars	2022 Actual	2023 Budget	2023 Forecast	2024 Budget	Variance
Total Depreciation and Amortization	305	267	278	289	11

- Decrease in 2023 Forecast vs 2022 Actuals is a result of the revised useful lives based on a depreciation study
- Increase in depreciation from 2023 Forecast vs 2024 Budget is due to higher capital investments for distribution infrastructure

FINANCE COSTS —

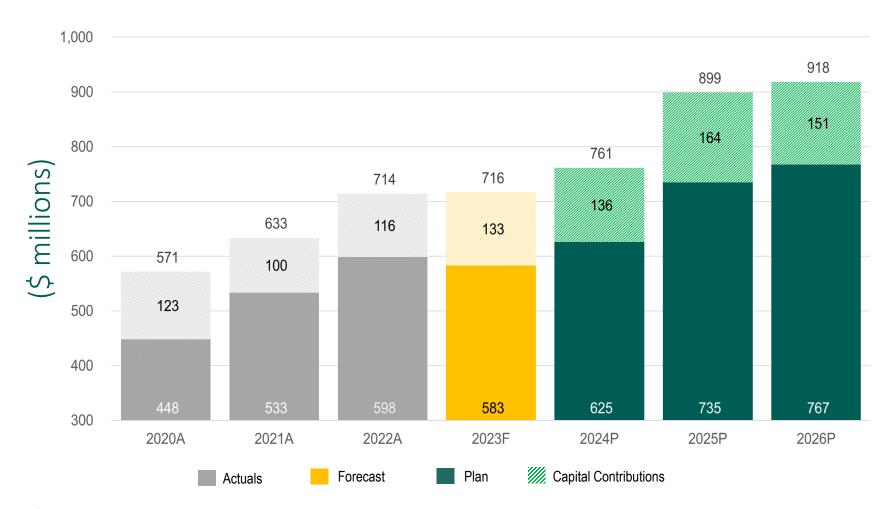


	2022	2023	2023	2024	Variance
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	variance
Interest on Short and Long Term Debt	88	108	105	112	7
Capitalized Interest	(7)	(8)	(7)	(7)	-
Customer Deposits	1	-	-	-	-
Financing Costs and Other	3	(1)	3	3	-
Total Finance Costs	85	99	101	108	7

- 2023 Forecast includes 10 year \$250M debt replacement issued on June 14th, 2023 at 4.66% and 5 year \$200M new debenture issued on October 12th, 2023 at 5.18%.
- 2024 Budget includes a \$200M debt issuance on November 1st, 2024 at 5.85%

CAPITAL EXPENDITURES (GROSS vs NET*)





^{*}Net of capital contributions received

CAPITAL EXPENDITURES

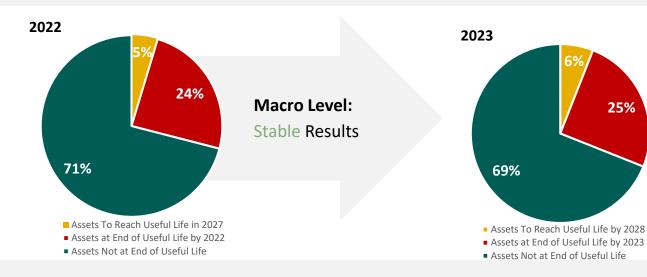


In millions of Canadian dollars	2022	2023	2023	2024	Variance
	Actual	Budget	Forecast	Budget	
Infrastructure Renewal	312	347	342	414	72
Reactive Capital	48	43	46	45	(1)
Customer Connections	126	140	124	138	14
Hydro One Contributions	24	17	13	10	(3)
Copeland Transformer Station	27	11	6	4	(2)
IT, Fleet and Facilities	112	94	96	81	(15)
Externally Initiated Plant Relocations & Expansions	65	84	85	64	(21)
Provincial Allocations and Other	_	9	4	5	1
Gross Capital Program	714	745	716	761	45
Capital Contributions	(116)	(149)	(133)	(136)	(3)
Net Total Capital	598	596	583	625	42

SYSTEM RENEWAL



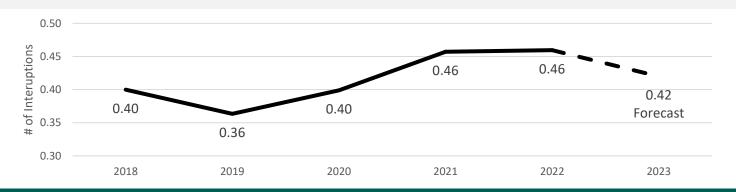
Leading Indicator: Assets Past Useful Life (Age)



Micro Level:

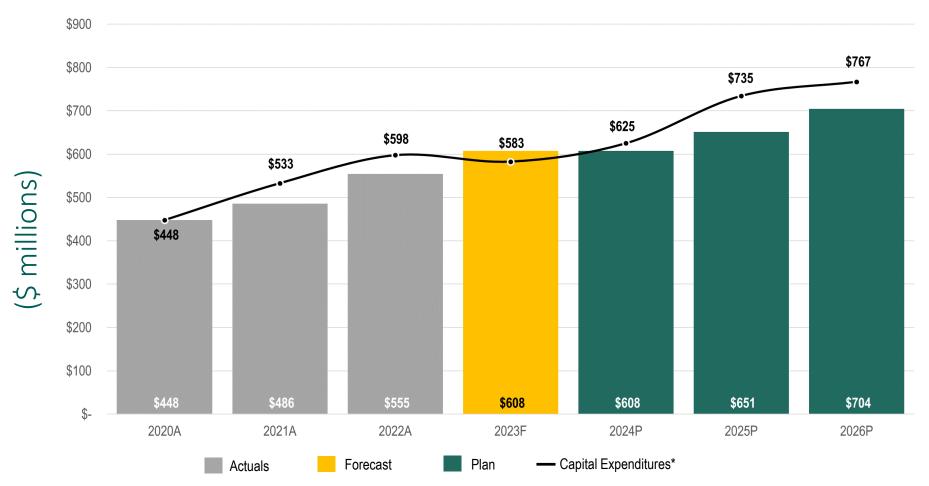
Slight deterioration for some asset types (e.g. underground cable). Similar deterioration for some asset condition results.

Lagging Indicator: System Average Interruption Frequency Index (SAIFI - Defective Equipment)



IN-SERVICE ADDTIONS* AND CAPITAL EXPENDITURES ____





^{*} Net of capital contributions received



2024 STATEMENT OF INCOME

UNREGULATED

Statements of Income				
In millions of Canadian dollars	Corporate	Regulated	Unregulated	Consolidated
For the year ending December 31, 2024				
Energysales		2,960		
Distribution revenue		931		
Other revenues		87		
Total revenues		3,978		
Energy purchases		3,004		
Operating expenses		349		
Depreciation and amortization		289		
Total expenses		3,642		
Finance costs		108		
Gain on disposals of property, plant and equipment		2		
Income/(loss) before income taxes		230		
Income tax expense/(recovery)		36		
Net movements in regulatory balances		(80)		
Net movements in regulatory balances arising from deferred taxes		33		
Net income after net movements in regulatory balances		147		

OTHER REVENUES



OPERATING - EXPENSES -



CAPITAL - EXPENDITURES





*Includes contributions received related to energy storage



CONSOLIDATED - STATEMENTS OF INCOME

INCOME ———	\$1,750,000 \$1,500,000 \$1,500,000 \$1,500,000 \$1,500,000	\$350,000 \$350,000 \$650,000 \$195,000 \$227,500	\$4,375,000 \$2,000,000 \$700,000 \$1,300,000 \$390,000 \$455,000
	\$0 \$0 \$250,000	0,000	\$1,500,000

Consolidated Statements of Income In millions of Canadian dollars	2022 Actual	2023 Budget	2023 Forecast	2024 Budget	2025 Budget	2026 Budget
For the years ended December 31	Actual	Duaget	loloust	Duuget	Duuget	Duaget
Energy sales	2,738	2,988	2,811	2,960	3,060	3,128
Distribution revenue	754	827	833	931	1,035	1,023
Other revenues	110	105				
Total revenues	3,602	3,920				
Energy purchases	2,847	2,988	2,898	3,004	3,060	3,128
Operating expenses	323	359				
Depreciation and amortization	311	274				
Total expenses	3,481	3,621				
Finance costs	88	104				
Gain on disposals of property, plant and equipment	-	1	36	2	2	2
Income/(loss) before income taxes	33	196				
Income tax (expense)/recovery	8	42				
Net movements in regulatory balances	137	(71)	(1)	(80)	(68)	(11)
Net movements in regulatory balances arising from deferred taxes	2	50	20	33	33	33
Net income after net movements in regulatory balances	164	133				

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CONSOLIDATED BALANCE SHEETS -

\$1,750,000 \$1,500,000	\$500,000 \$175,000 \$325,000 \$77,500	\$3,500,000 \$1,000,000 \$350,000 \$650,000 \$195,000 \$227,500 \$227,500	\$4,375,000 \$4,375,000 \$2,000,000 \$700,000 \$1,300,000 \$390,000 \$455,000 \$455,000
\$0	\$1,238,750	20,000	\$1,500,000

Consolidated Balance Sheets	2022	2023	2023	2024	2025	2026
In millions of Canadian dollars	Actual	Budget	Forecast	Budget	Budget	Budget
As at December 31	Actual	Duugei	i orecast	Duuget	Duuget	Duaget
Assets						
Current		1				
Accounts receivable	224	228				
Unbilled revenue	277	270				
Other assets	25	31				
Total current assets	526	529				
Property, plant, equipment and intangible assets	6,144	6,612				
Other assets	14	8				
Total assets	6,684	7,149				
Regulatory balances	263	271	391	387	333	333
Total assets and regulatory balances	6,947	7,420				
Liabilities and Equity						
Current						
Working capital facility and commercial paper	368	407				
Debentures	250	-				
Other liabilities	565	544				
Total current liabilities	1,183	951				
Debentures	2,479	2,927				
Deferred tax liabilities	85	141				
Other liabilities	988	1,063				
Total liabilities	4,735	5,082				
Equity						
Share capital	818	818				
Retained earnings	1,244	1,277				
Total equity	2,062	2,095				
Total liabilities and equity	6,797	7,177				
Regulatory balances	150	243	252	295	276	254
Total liabilities, equity and regulatory balances	6,947	7,420				

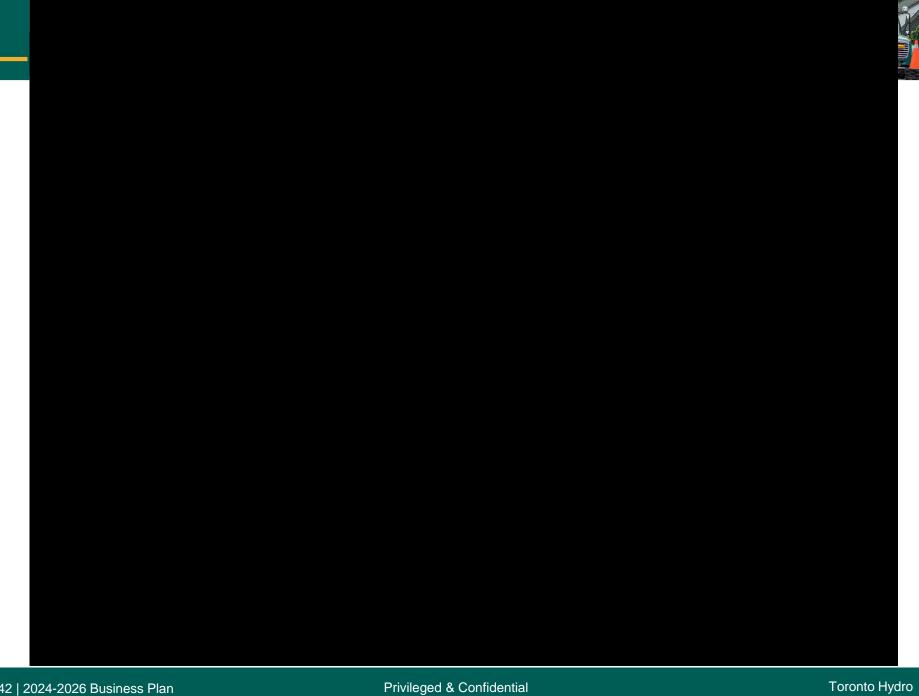
CONSOLIDATED STATEMENTS OF CASH FLOWS -

\$1,750,000	\$500,000 \$175,000 \$325,000 \$77,500 \$1,500 \$1,500	\$3,500,000 \$1,000,000 \$350,000 \$650,000 \$195,000 \$227,500 \$227,500	\$4,375,000 \$4,375,000 \$2,000,000 \$700,000 \$1,300,000 \$390,000 \$455,000
\$0	\$1,238,750	20,000	\$1,500,000

Consolidated Statements of Cashflows	2022	2023	2023	2024	2025	2026
in millions of Canadian dollars	Actual	Budget	Forecast	2024 Budget		
Year ended December 31	Actual	Buaget	Forecast	Buaget	Budget	Budget
Operating Activities						
Net income after net movements in regulatory balances	164	133				
Net movements in regulatory balances	(137)	71	1	80	68	11
Net movements in regulatory balances arising from deferred taxes	(2)	(50)	(20)	(33)	(33)	(33)
Depreciation, amortization and other changes	364	414				
Capital contribution received	86	149	133	104	164	151
Changes in non-cash operating working capital balances	(6)	(29)				
Net cash provided by operating activities	469	688				
Investing Activities						
Purchase of property, plant, equipment and intangible assets	(675)	(754)				
Proceeds on disposal of property, plant, and equipment	-	1	36	2	2	2
Net cash used in investing activities	(675)	(753)				
Financing Activities						
Increase (decrease) in commercial paper, net	80	67				
Dividends paid	(85)	(95)				
Proceeds from issuance of debentures net of debt issuance costs paid	299	448				
Repayment of debentures	-	(250)				
Interest paid	(92)	(105)				
Common Shares Issued	-	-				
Net cash provided by (used in) financing activities	202	65				
Net change in cash and cash equivalents during the year	(4)	-				
Working capital facility, beginning of year	(9)	-				
Working capital facility, end of year	(13)	-				







REGULATORY ALIGNMENT

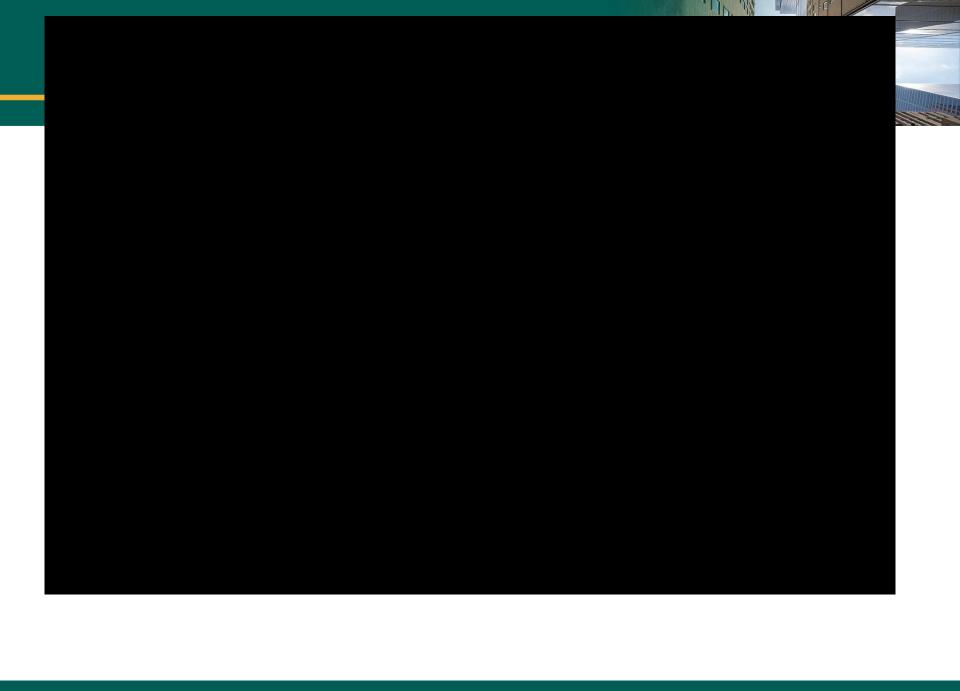
2020-2024 DECISION



General Plant Capital	Alignment
Fleet	
Facilities	
Information Technology	
Control Center	
ERP Phase 2	
CIS Upgrade	

Operational Plan	Alignment
Distribution Operations	
System Maintenance	
Corporate Services	
Information Technology	
Customer Operations	







SUBJECT TO APPROVAL AND CHANGES BY THE HUMAN RESOURCES AND ENVIRONMENT COMMITTEE FOR RECOMMENDATION TO THE BOARD



CORPORATE 2023-2024 SCORECARD



		2023	2024	Pillar
Pillar	KPI	Weight	Weight	Weight
Customer	New Services Connected on Time	5%	10%	
	Estimated Time of Restoration	5%	5%	Customer 25%
ō	First Contact Resolution	5%	10%	
People	Total Recordable Injury Frequency	10%	10%	People
Peo	Employee Engagement	5%	5%	15%
Environment	Building Emissions Reduction	5%	-	
	Fleet Electrification	5%	-	
ıtions	SAIFI (Defective Equipment Only)	10%	10%	Operations
Operations	SAIDI (Defective Equipment Only)	10%	10%	20%
Financial	In-Service Assets	10%	10%	Finance
	Consolidated Net Income	30%	30%	40%
		100%	100%	100%

CONTINUOUS IMPROVEMENT FRAMEWORK





CUSTOMER



PEOPLE



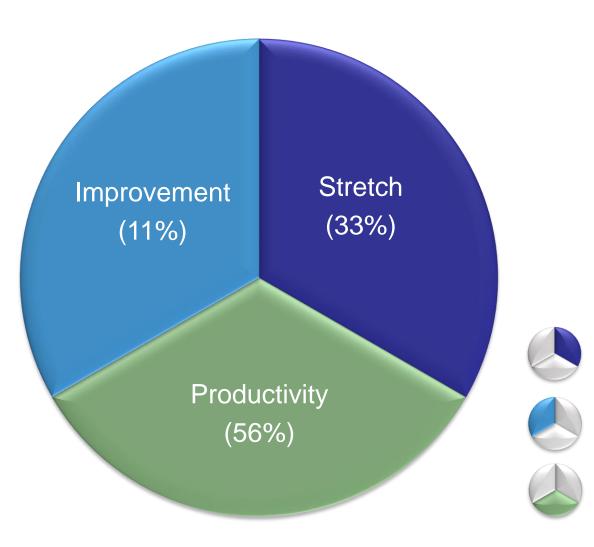
ENVIRONMENT



OPERATIONS



FINANCIAL



2024 CORPORATE SCORECARD

ANALYSIS.

9 KPIs in 2024 (11 in 2023)

		2024				
Pillar	KPI	Weight	Threshold	Target	Stretch	Continuous Improvement
e."	New Services Connected on Time	10%	93%	98%	99%	
Customer	Estimated Time of Restoration	5%	80%	85%	90%	
ن ت	First Contact Resolution	10%	82%	86%	88%	
People	Total Recordable Injury Frequency	10%	1.00	0.95	0.90	
Peo	Employee Engagement	5%	8.0	8.5	9.0	
Operations	SAIFI (Defective Equipment Only)	10%	0.61	0.50	0.48	
Opera	SAIDI (Defective Equipment Only)	10%	30.69	25.23	24.19	
Financial	In-Service Assets	10%	496.0	501.0	506.0	
Final	Consolidated Net Income	30%	100.0	105.0	110.0	
		100%	25%	100%	150%	



4 are harder - 44.5%



4 are the same – 44.5%



1 is lower - 11%



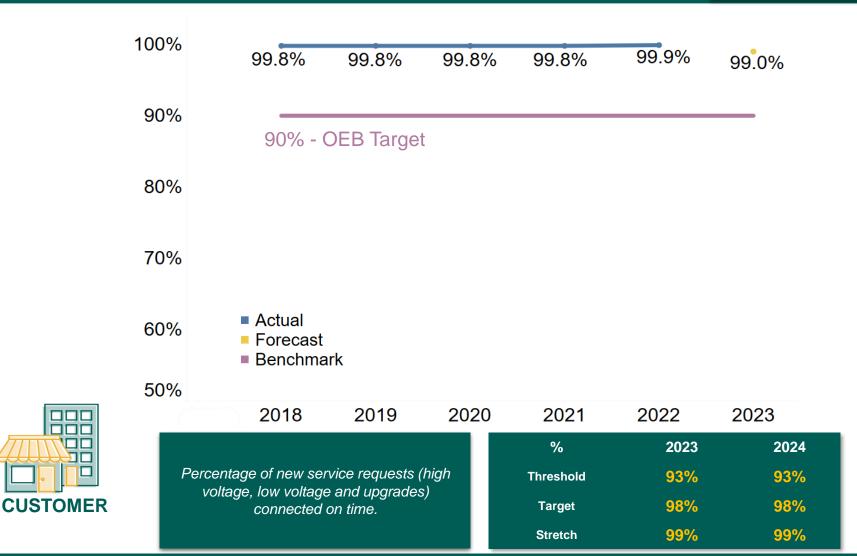
Customer (25%) .

- New Services Connected on Time: 10%
- Estimated Time of Restoration (ETOR): 5%
- First Contact Resolution: 10%

NEW SERVICES CONNECTED ON TIME (10%)

Continuous Improvement

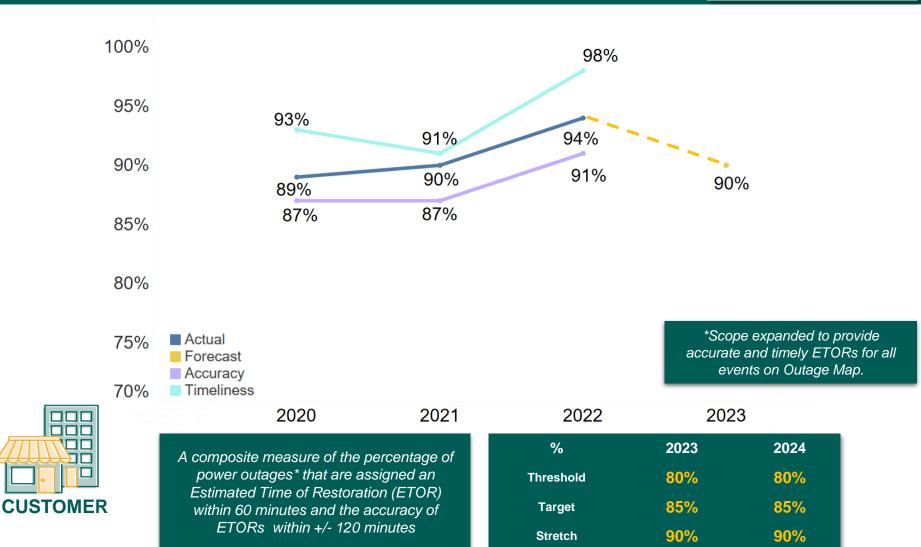




ESTIMATED TIME OF RESTORATION (ETOR) (5%)

Continuous Improvement

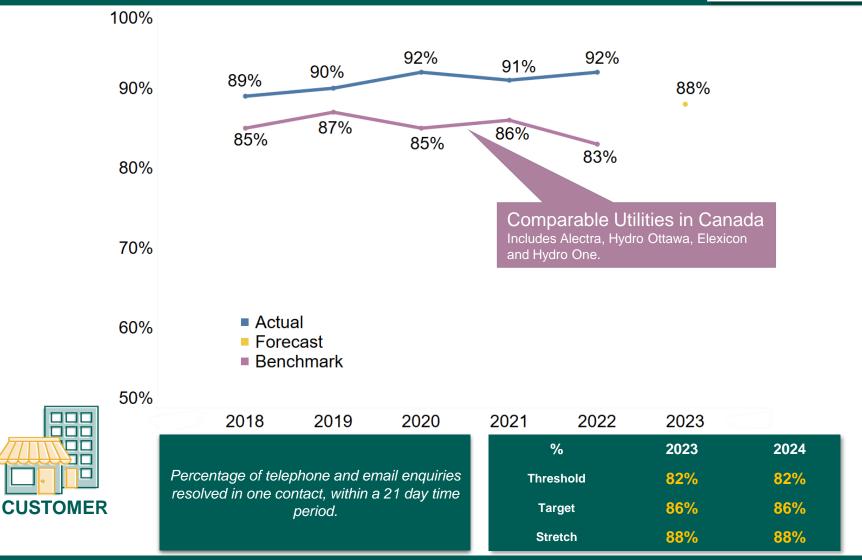




FIRST CONTACT RESOLUTION (10%)

Continuous Improvement







People (15%)

- Total Recordable Injury Frequency: 10%
- Employee Engagement: 5%

Continuous Improvement

TOTAL RECORDABLE INJURY FREQUENCY (10%)

per Electricity Canada Standard.

PEOPLE

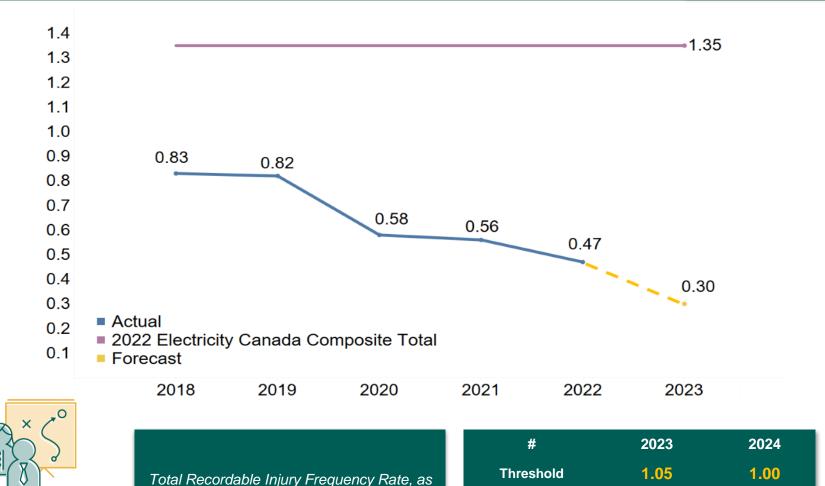


1.00

0.95

0.95

0.90



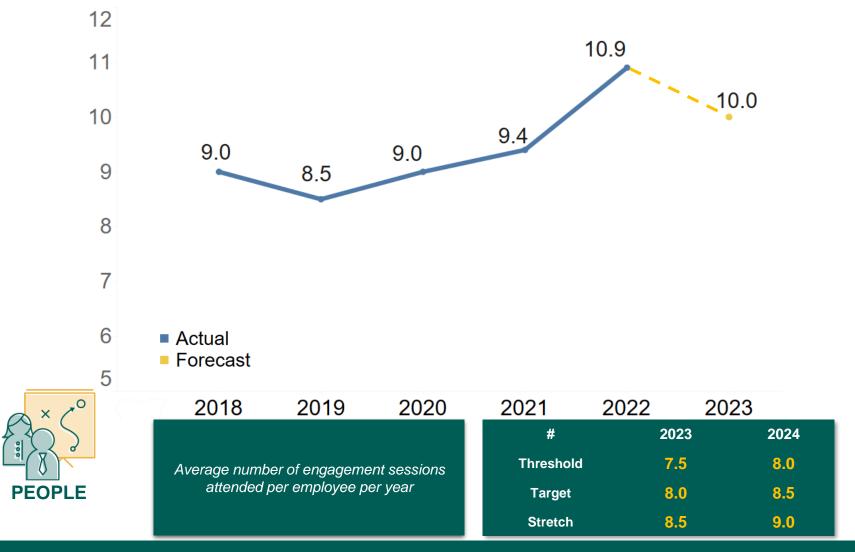
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Target

Stretch



EMPLOYEE ENGAGEMENT (5%)





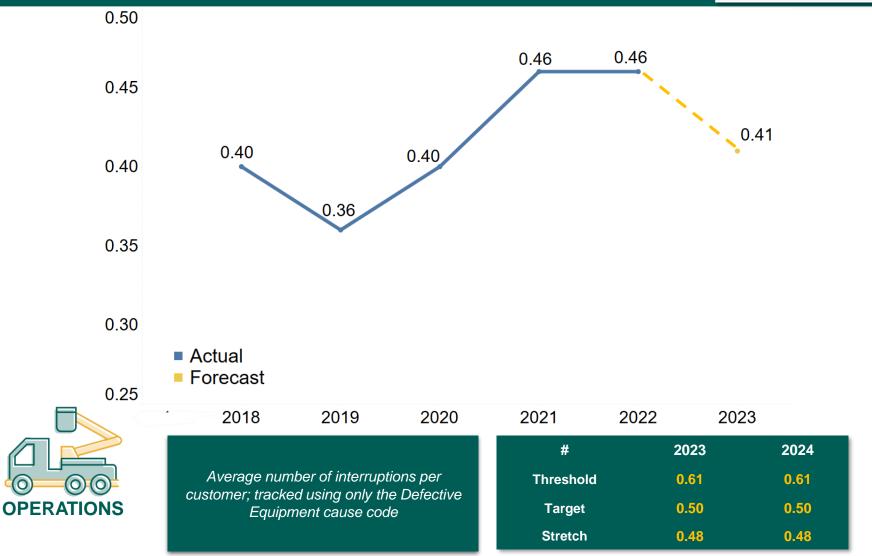
Operations (20%)

- Outage Frequency (SAIFI Defective Equipment): 10%
- Outage Duration (SAIDI Defective Equipment): 10%

OUTAGE FREQUENCY – DEFECTIVE EQUIPMENT (10%)

Continuous Improvement

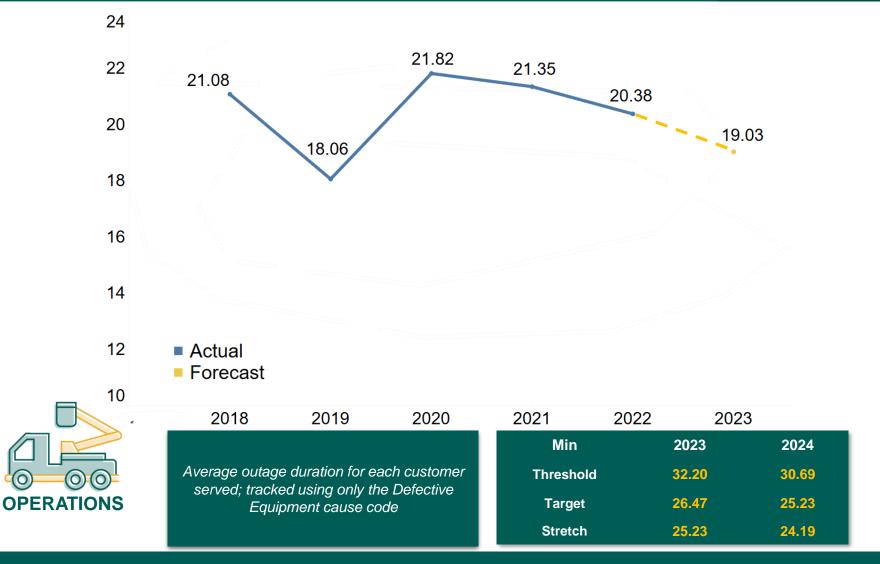




OUTAGE DURATION – DEFECTIVE EQUIPMENT (10%)

Continuous Improvement







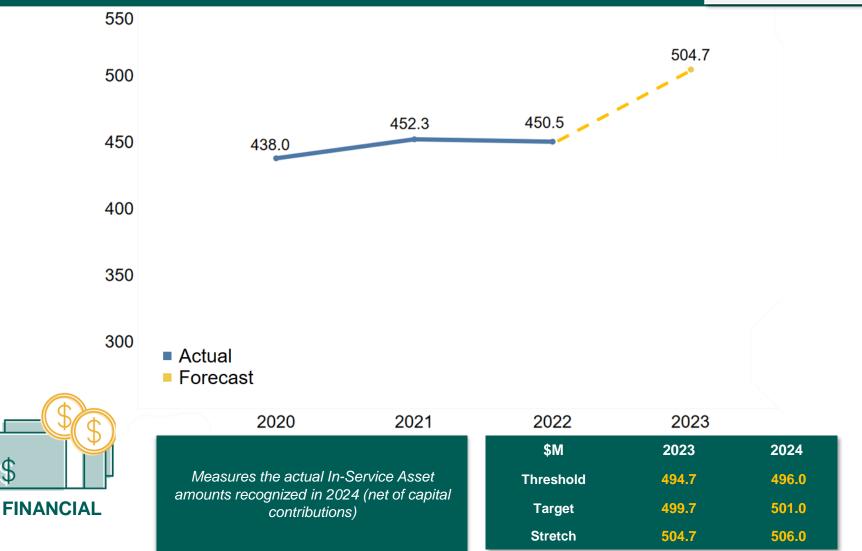
Financial (40%)

• In-Service Assets: 10%

• Consolidated Net Income: 30%



IN-SERVICE ASSETS (10%)

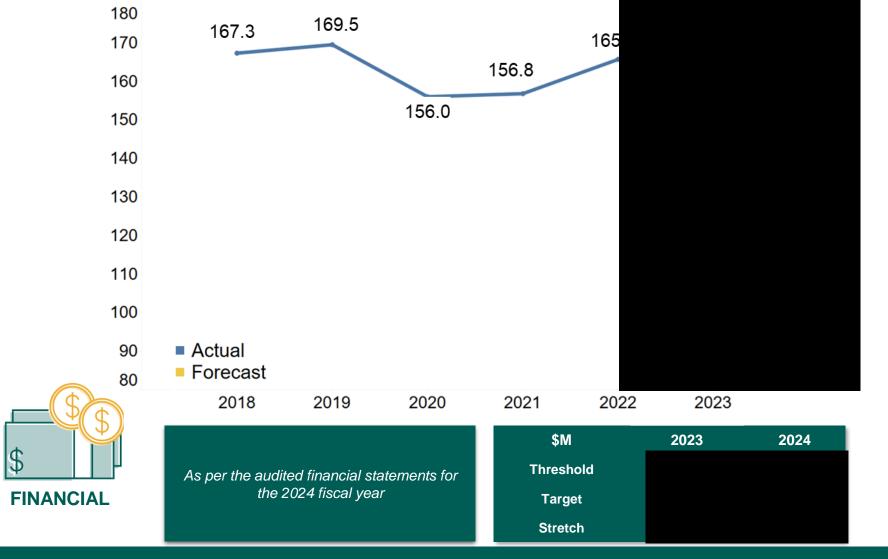


CONSOLIDATED NET INCOME (30%)

Continuous Improvement







2024 CORPORATE SCORECARD

Review and recommend for approval to the THC Board via HREC

		2024				
Pillar	KPI	Weight	Threshold	Target	Stretch	Continuous Improvement
<u>_</u>	New Services Connected on Time	10%	93%	98%	99%	
Customer	Estimated Time of Restoration	5%	80%	85%	90%	
ರ	First Contact Resolution	10%	82%	86%	88%	
ple	Total Recordable Injury Frequency	10%	1.00	0.95	0.90	
People	Employee Engagement	5%	8.0	8.5	9.0	
tions	SAIFI (Defective Equipment Only)	10%	0.61	0.50	0.48	
Operations	SAIDI (Defective Equipment Only)	10%	30.69	25.23	24.19	
ıcial	In-Service Assets	10%	496.0	501.0	506.0	
Financial	Consolidated Net Income	30%	100.0	105.0	110.0	
		100%	25%	100%	150%	







Connect with us













2025 RATE APPLICATION STRATEGY & UPDATE -

August 14, 2023

Amanda Klein

EVP, External Affairs, Corporate Development & Chief Legal Officer

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2025-2029 REGULATORY STRATEGY

Note for new independent directors: the THC board received this strategy (slides 3-8 plus appendix slides) as part of the November 2022 business plan meeting. We are bringing this forward here for your information.



GRID & OPERATIONS PLANS 2025-2029 INVESTMENT DRIVERS



System Stewardship:
Grid & Operational Performance



Continue to deliver safe and reliable/resilient service

Modernization



Adopt technology to modernize our grid and operations

City Growth & Electrification



Connect and serve growing demand

RATE APPLICATION STRATEGIC PARAMETERS



Capital Program

2025-2029 Capital Expenditures



Operational Plan

2025-2029 Operational Expenditures



Distribution Rates

2024-2029 Average Annual Residential Rate Increase (without rate smoothing)

5 Toronto Hydro

STRATEGIC PARAMETERS CAPITAL FUNDING

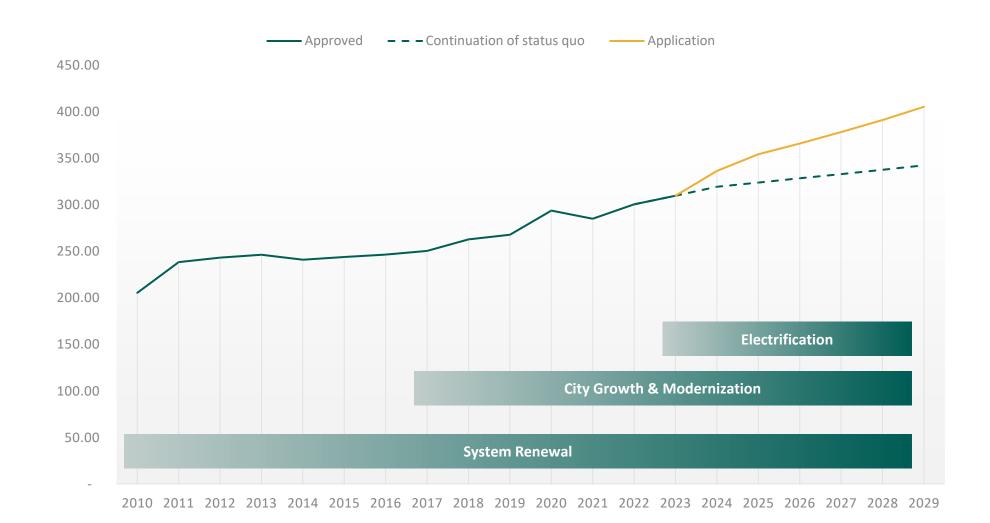
100.00



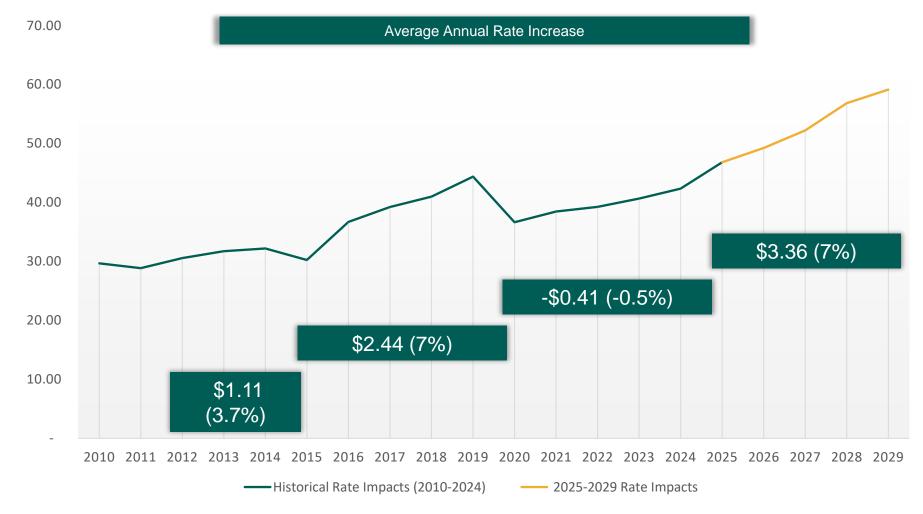
2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029

System Renewal

STRATEGIC PARAMETERS OPERATIONAL FUNDING









RATE APPLICATION JOURNEY TO FILING



Utility of the Future

Strategic plan for the organization



Climate Action Plan

Enabling electrification as the expanded distributor



Customer Engagement Phase 1 (Needs & Priorities)

Customer needs and priorities for the 2025-2029 planning period

Regulatory Strategy

Funding and flexibility to execute the 2025-2029 investment plan



Integrated Business & Investment Planning

2023-2029 Investment Plans (Workforce, OM&A, Capital)



Regulatory Landscape

Emerging OEB expectations and requirements for LDC performance (Activity & Program Based Benchmarking, Framework for Energy Innovation, Reliability & Power Quality Benchmarking, Distribution Sector Resilience, Responsiveness & Cost Efficiency)



Customer Engagement Phase 2 (**Draft Plan**)

Customer feedback on key trade-offs and social permission for the draft plan



2025-2029 Custom Incentive Rate Application

Performance incentives provide upfront benefits to customers (rate mitigation) and place the risk/reward emphasis on the delivery of performance outcomes.



We are here

10 Toronto Hydro

GRID & OPERATIONS PLANS KEY INVESTMENT CATEGORIES

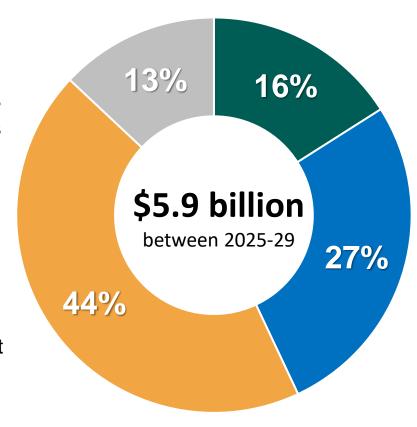


General Plant

Investments in vehicles, work centers and IT to keep the business running and reduce Toronto Hydro's emissions.

Sustainment & System Stewardship

Investments to upkeep old equipment that is in poor condition and replace outdated equipment.



Modernization

Investments in technology to get more use out of existing equipment, and build a smarter, more efficient and reliable grid.

City Growth & Electrification

Investments in capacity to power the growing city and serve customers' growing and changing needs for electricity.

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Rate Class	2018 Participation Numbers	2018 Social Permission	2023 Participation Numbers	2023 Social Permission	2018 vs. 2023 Participation Numbers	2018 vs. 2023 Social Permission
Residential	10,765	71%	32,187	80%	199%	+9%
Small Business	396	55%	695	77%	76%	+22%
C&I	202	73%	264	82%	31%	+9%
Key Accounts	37	78%	52	96%	41%	+18%
Total	11,400	69%	33,198	84%	191%	+15%

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STRATEGIC PARAMETERS

Capital Program

2025-2029 Capital Expenditures



Operational Plan

2025-2029 Operational Expenditures

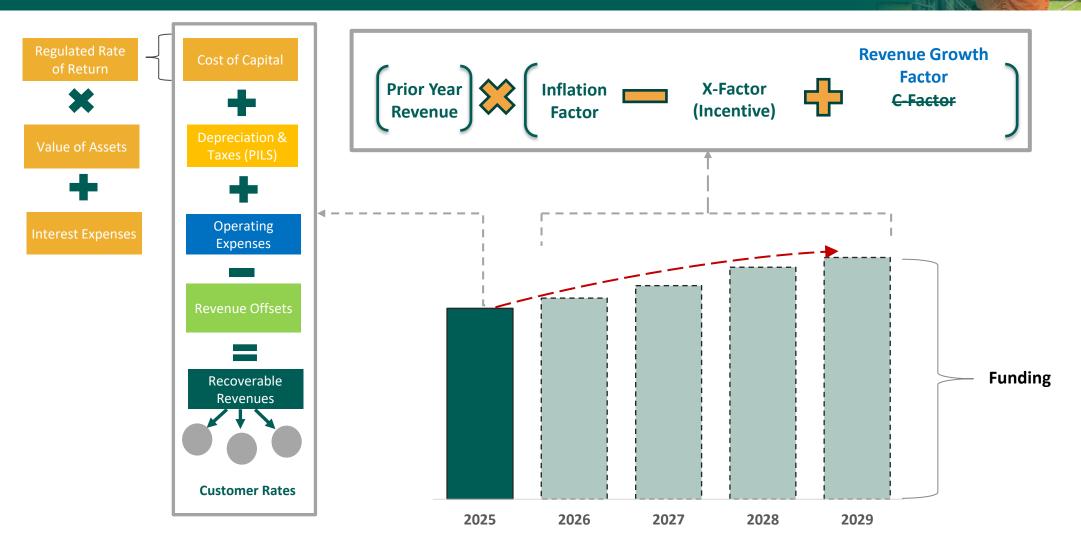
Distribution Rates

2024-2029 Average Annual Residential Rate Increase (without rate smoothing) ~7.2% smoothed

~7%

CAGR

RATE FUNDING FORMULA - HOW IT WORKS ————

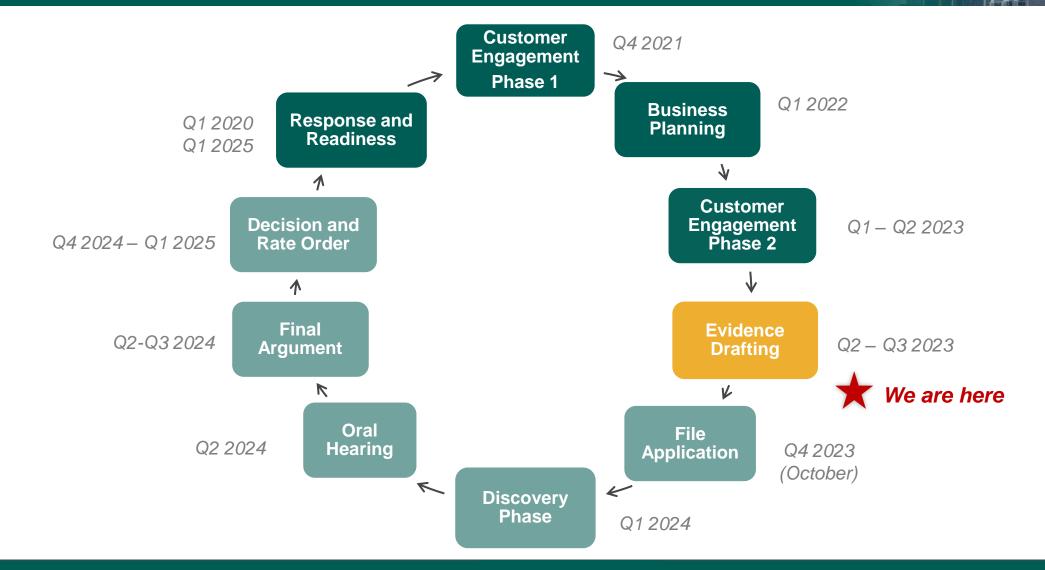


REGULATORY STRATEGY CUSTOM RATE FRAMEWORK —

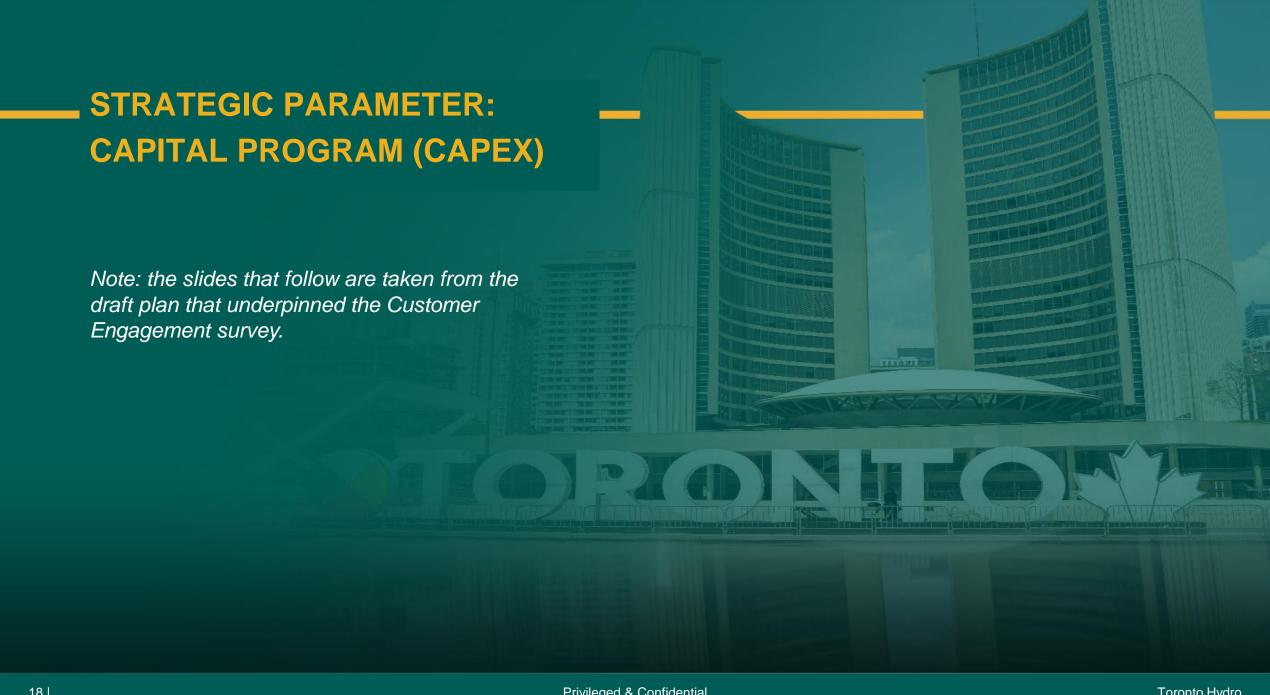


Element	2025-2029 Custom IR Application
Custom Revenue Cap Index (CRCI)	Prior Year Revenue escalated by <i>Inflation (I-factor) - Incentive (X-factor) + Revenue Growth Factor</i>
Revenue Growth Factor	Escalates revenue annually to increase Toronto Hydro's financial capacity to invest in capital and operations programs over the outer years of the rate period (i.e. 2026-29)
Inflation (I-Factor)	OEB methodology with a custom index for labour (Conference Board of Canada Toronto Salary and Wages Index)
Incentive (X-Factor)	Provides upfront benefits to customers (rate reduction) and the utility an opportunity to earn an incentive by achieving outcomes tied to metrics and targets on the 2025-2029 custom scorecard.
New Deferral and Variance Accounts	Growth Variance Account (reconciles cost and revenue variances related to changes in demand); Locates Variance Account (reconciles cost variances related to Bill 93)

RATE APPLICATION PROJECT LIFECYCLE -







SUSTAINMENT OBJECTIVES

PLAN OBJECTIVES & HIGHLIGHTS

- Maintain overall health demographics of the asset population in 2025-2029
- Ensure investment pacing contributes to stable longterm investment profiles (2030+) for all assets
- Adhere to previous commitments for **safety and environmental compliance activities** (e.g. PCBs by 2025; Box Conversion by 2026)
- > Maintain recent historical system reliability.
- Optimize the pace of renewal investment from year-toyear (cost control) using improved risk-based decisionmaking tools.

Outcome.	Goal	2025-2029 Status Quo Option	2025-2029 Draft Plan	2025-2029 Enhanced Option
Total Expenditures*		\$1,269.2	\$1,577.9	\$1,976.1
SAIFI	>			
SAIDI	>			
Assets Past Useful Life	•			
Asset Health	>			
Oil Spills cont. PCBs				
System Safety Risk				•

^{*}Total expenditures exclude allocations such as EAR & AFUDC

Exceed (improved)

Achieve (stable)

At Risk (caution)

GROWTH OBJECTIVES

PLAN OBJECTIVES & HIGHLIGHTS

- Connect customers efficiently and with consideration for a likely increase in connections volumes due to electrification
- Expand stations capacity to alleviate future load constraints, with consideration for increased EV uptake, decarbonization drivers, and other growth factors (digitization and redevelopment).
- Optimize near-term system capacity through load transfers, bus balancing, cable upgrades and the targeted use of non-wires alternatives such as demand response and energy efficiency.
- Alleviate constraints on restricted feeders to accommodate increasing DER connections.
- Install control and monitoring capabilities for all generators > 50kW
- Accommodate relocations for committed third-party developments, including priority transit projects

Outcome	Goal	2025-2029 Status Quo Option	2025-2029 Draft Plan	2025-2029 Enhanced Option
Total Expenditures*		\$861.3	\$940.5	\$1,109.5
Load Capacity			•	•
Hosting Capacity	_	•	•	•
Obligation to Serve	•			
Operational Flexibility	A		•	•

^{*}Total expenditures exclude allocations such as EAR & AFUDC

Achieve (stable)

At Risk (caution)

Exceed (improved)

MODERNIZATION

OBJECTIVES

PLAN OBJECTIVES & HIGHLIGHTS

- Prioritize investments that will deliver demonstrable benefits to customers, especially enhancements that will enhance value-for-money in the long-term (i.e. efficiency)
- Improve system reliability through enhanced fault management, leveraging automation and advanced metering (AMI2.0)
- Enhance system observability across the system, enabling better asset management and operational decision making
- Leverage technology to improve customer experience (e.q. reliability, power quality, customer tools, DER integration)
- Enhance resiliency and security of the system through advanced grids, targeted undergrounding of critical overhead assets, and enhancements to distribution schemes for critical loads downtown.

Outcome	Goal	2025-2029 Status Quo Option	2025-2029 Draft Plan	2025-2029 Enhanced Option
Total Expenditures*		\$427.3	\$518.6	\$715.5
SAIFI		•	•	
SAIDI				
Customer Experience			•	
System Observability	A		•	
Operational Flexibility		•	•	
System Resiliency	A		•	
Operational Efficiency				

^{*}Total expenditures exclude allocations such as EAR & AFUDC

Achieve (stable)

At Risk (caution)

Exceed (improved)

GENERAL PLANT OBJECTIVES —



Fleet & Facilities:

- > Implement Toronto Hydro's NZ40 strategy:
 - > Achieve 80% buildings emissions reductions by 2040
 - > Expand fleet electric vehicle charging infrastructure and electrify 40% of fleet by 2029
- Improve stations site conditions and physical security to meet legislative requirements (OBC, OHSA, CSF, etc.)
- > Replace **critical** facilities assets in **poor** condition

IT/OT:

- > Support Utility of the Future objectives re Grid Modernization, Process Automation & Customer Experience objectives
- Minimize reliability and cybersecurity risks
- > Ensure IT infrastructure is available and reliable with minimal service disruption

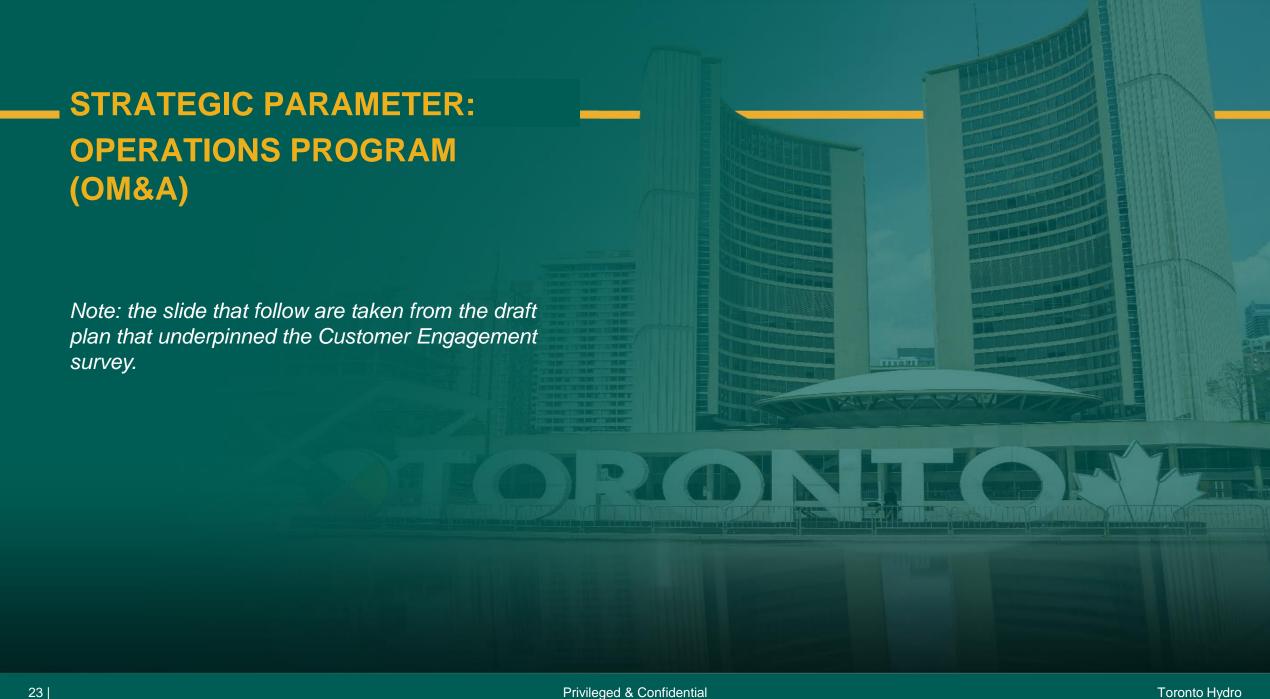
Outcome	Goal	2025-2029 Status Quo Option	2025-2029 Draft Plan	2025-2029 Enhanced Option
Total Expenditures*		\$480.8	\$613.4	\$665.3
Asset Condition & Reliability			•	
Emissions Reductions	A		•	
Security & Resiliency			•	•
Grid Modernization			•	
Process Automation			•	
Customer Experience	A			

*Total expenditures exclude allocations such as EAR & AFUDC

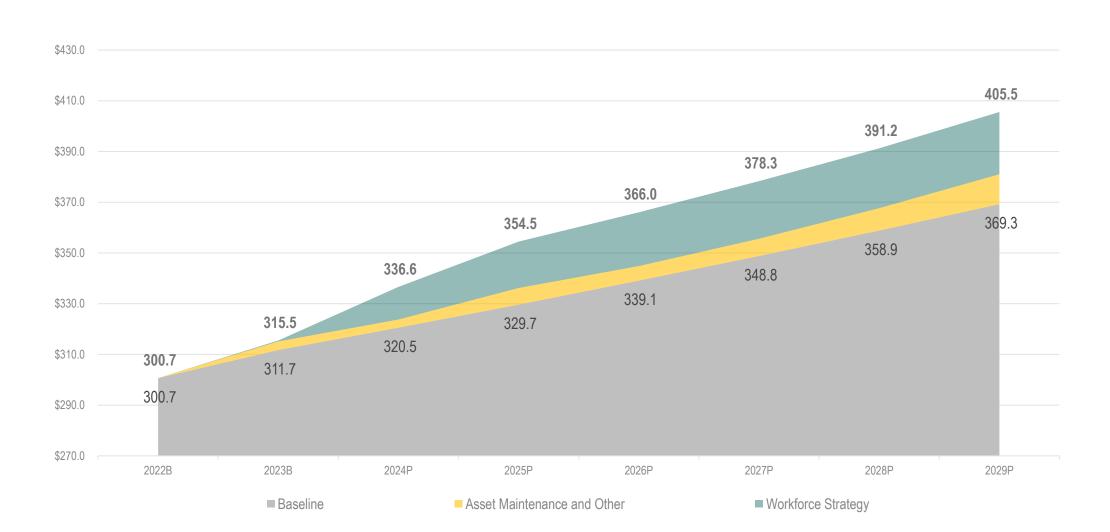
Exceed (improved)

Achieve (stable)

At Risk (caution)



STRATEGIC PARAMETERS OPERATIONAL PLAN —





Note: the slides that follows is the feedback that customer provided Toronto Hydro before it developed its draft plan (Toronto Hydro later went back to customer with the draft plan to solicit customer feedback on it – see slide 14)

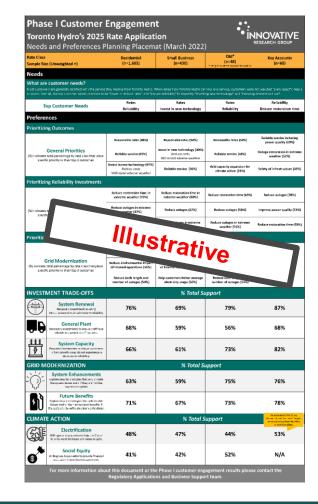
PIONSIE

2025-2029 INVESTMENT PLAN PHASE 1: NEEDS & PRIORITIES

Outcome **Customer Feedback** Price and reliability are top priorities. Despite a continued emphasis on price, reliability is **Price & Reliability** becoming more important to low-volume customers. Support for investments in new technology even if New Technology the benefits aren't immediate, as long as the benefits and costs are clear Support for proactive investments in system capacity infrastructure to ensure customers in **System Capacity** high growth areas do not experience a decrease in

reliability.

Customer Placemat



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CUSTOMER ENGAGEMENT & RATE APPLICATION _____UPDATE

August 16, 2023

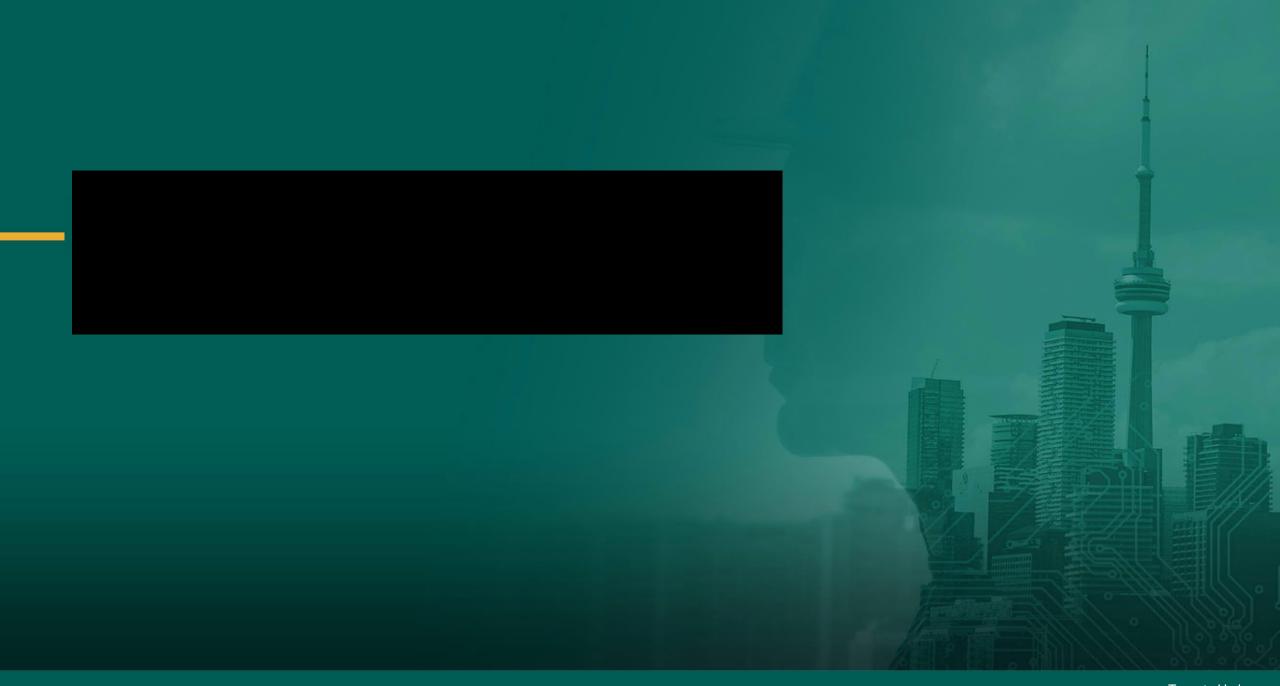
Amanda Klein

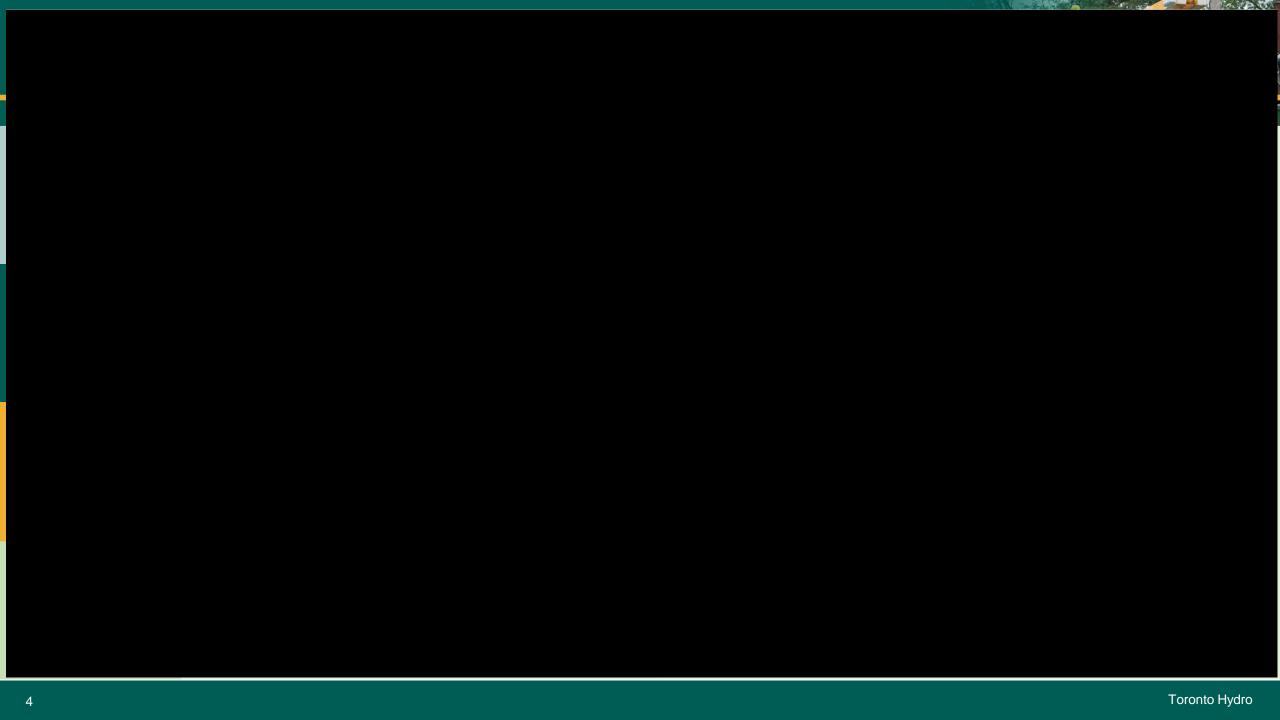
EVP, External Affairs, Corporate Development & Chief Legal Officer

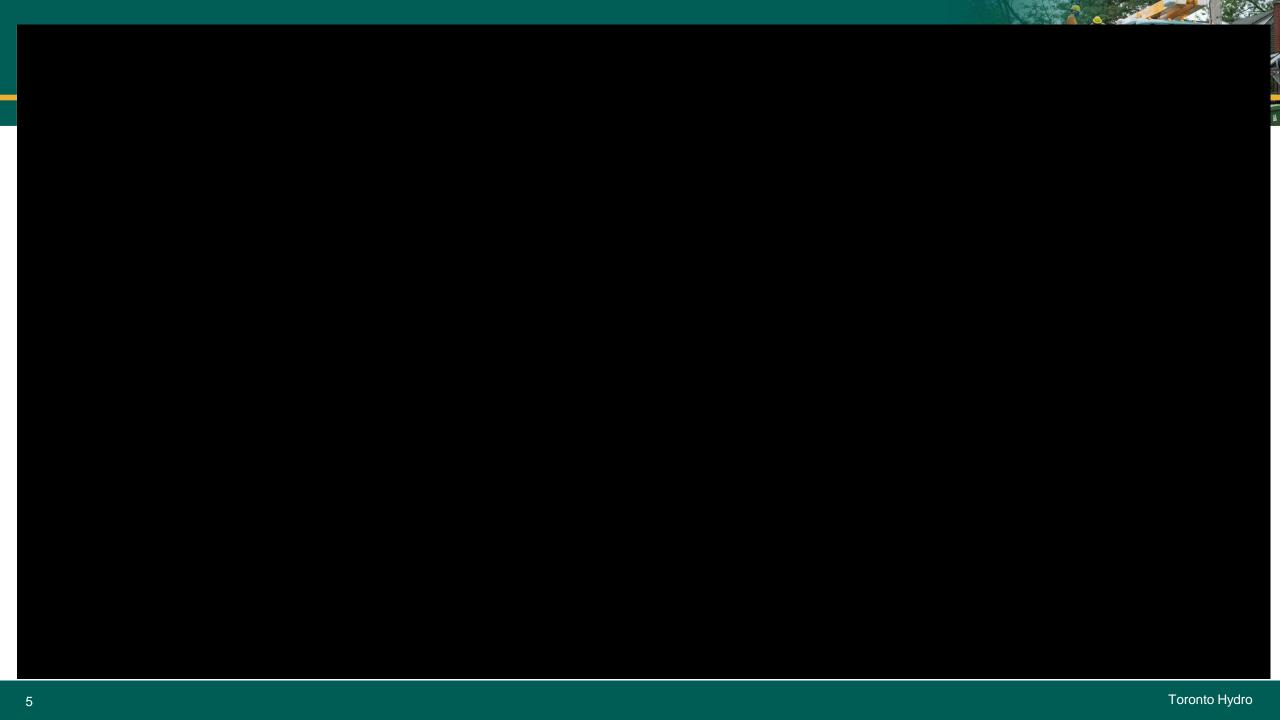
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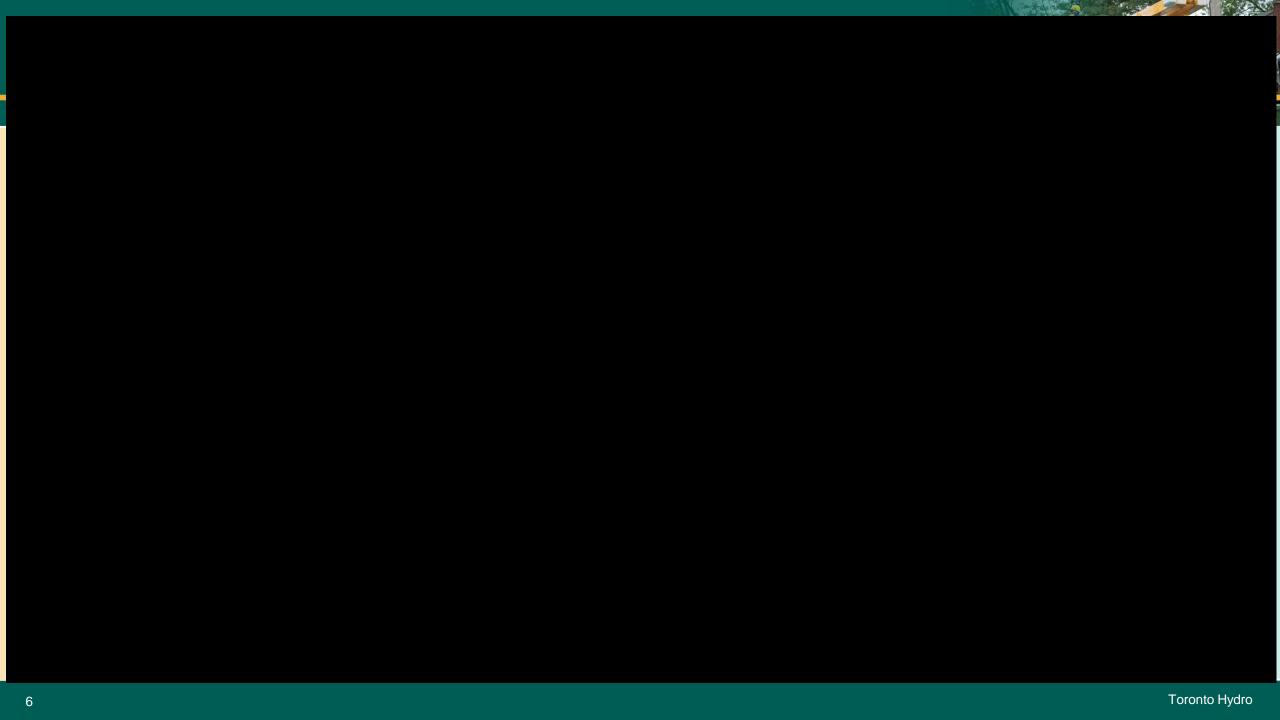
















2025-2029 INVESTMENT PLAN ENGAGEMENT PROCESS



1. Identify Customer Needs and Priorities

In 2021 and 2022, Toronto Hydro asked many types of customers from across the city about their priorities for electricity distribution service.

2. Use Customer Feedback to Guide Development of Plan

Toronto Hydro planners were given summaries of key findings from the initial customer engagement to consider as they began building their plans.

3. Collect Customer Feedback on the Draft Plan

Toronto Hydro is returning to customers to get feedback on aspects of their preliminary forecasted plan and ask customers how it's plan could better meet their needs and preferences.

4. Re-Examine Plan

Make appropriate changes to the Plan based on customer feedback.

5. Submit the Plan to the Ontario Energy Board

File the Plan, this workbook, and a summary report with the OEB where it will be examined by the OEB, consumer advocates, and other independent parties in a public hearing.

2025-2029 INVESTMENT PLAN PHASE 1 ENGAGEMENT: NEEDS & PRIORITIES



Outcome

Customer Feedback



Price & Reliability

Price and reliability are top priorities. Despite a continued emphasis on price, reliability is becoming more important to low-volume customers.



Modernization & Automation

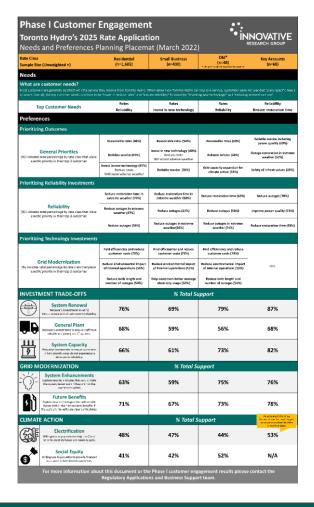
Support for investments in new technology even if the benefits aren't immediate, as long as the benefits and costs are clear.



Growth & Electrification

Support for proactive investments in system capacity infrastructure to ensure customers in high growth areas do not experience a decrease in reliability.

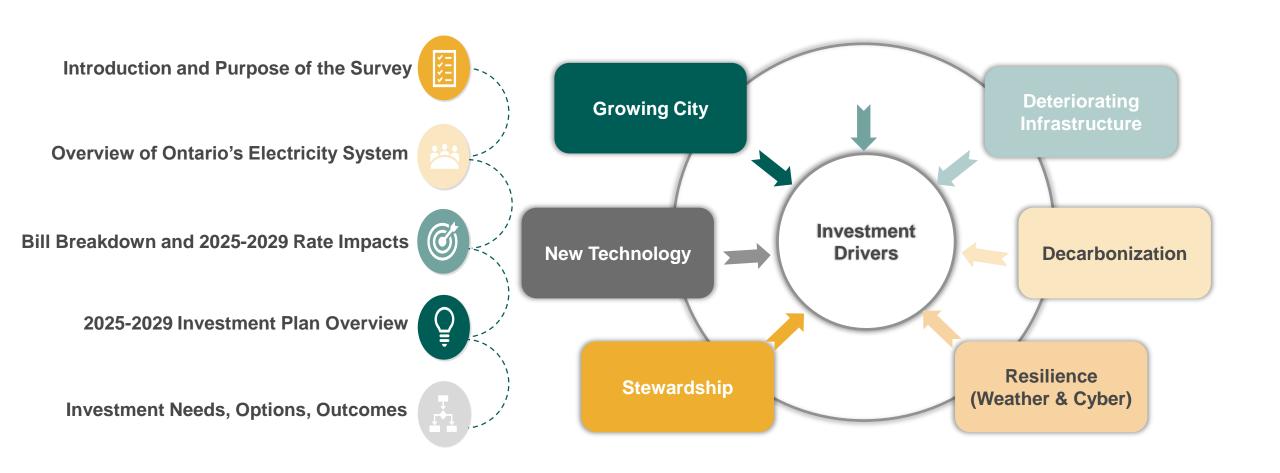
Customer Placemat



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2025-2029 INVESTMENT PLAN PHASE 2 ENGAGEMENT: WORKBOOK





2025-2029 INVESTMENT PLAN

PHASE 2 ENGAGEMNT: INVESTMENT OPTIONS



Draft Modernization Plan (16%)

Build a Smarter, more Efficient and Resilient Grid

Draft Growth Plan (27%)

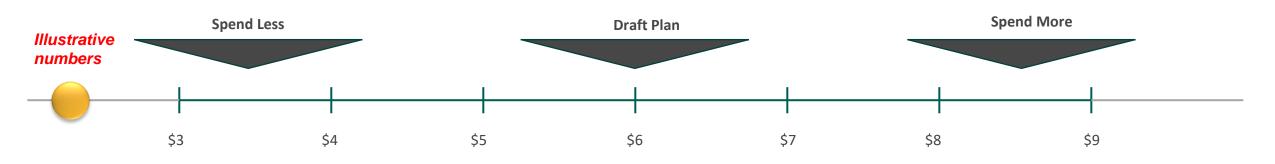
Increase Capacity to Serve Customers

Draft Sustainment Plan (44%)

- Manage Reliability due to Equipment Failure
- Paced the Upkeep of Equipment at or near EOL
- Standardize Outdated Equipment

Draft General Plant Plan (13%)

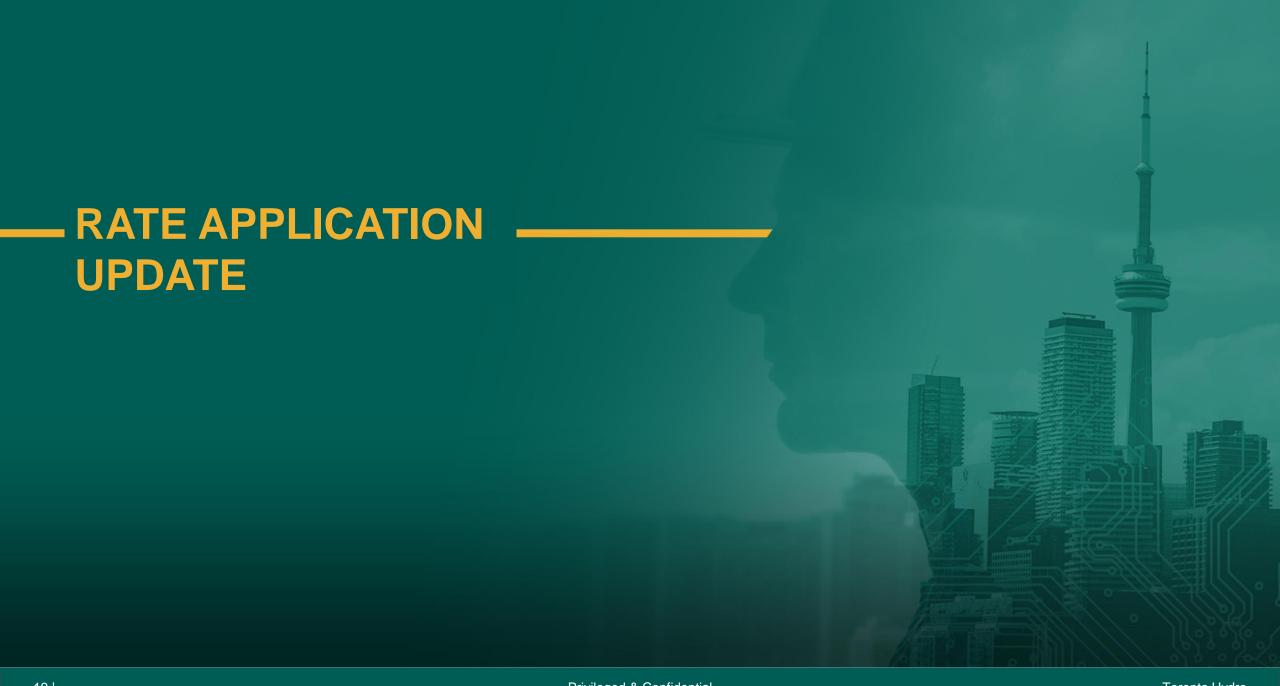
- Keep the Business Running
- Reduce Toronto Hydro's Building & Vehicle Emissions



2025-2029 INVESTMENT PLAN - PHASE 2 ENGAGEMENT RESULTS



Rate Class	2018 Participation Numbers	2018 Social Permission	2023 Participation Numbers	2023 Social Permission	2018 vs. 2023 Participation Numbers	2018 vs. 2023 Social Permission
Residential	10,765	71%	32,187	80%	199%	+9%
Small Business	396	55%	695	77%	76%	+22%
C&I	202	73%	264	82%	31%	+9%
Key Accounts	37	78%	52	96%	41%	+18%
Total	11,400	69%	33,198	84%	191%	+15%



2025 RATE APPLICATION JOURNEY TO FILING —



Utility of the Future

Strategic plan for the organization



Climate Action Plan

Enabling electrification as the expanded distributor



Customer Engagement Phase 1 (Needs & Priorities)

Customer needs and priorities for the 2025-2029 planning period

Regulatory Strategy

Funding and flexibility to execute the 2025-2029 investment plan



Integrated Business & Investment Planning

2023-2029 Investment Plans (Workforce, OM&A, Capital)



Regulatory Landscape

Emerging OEB expectations and requirements for LDC performance (Activity & Program Based Benchmarking, Framework for Energy Innovation, Reliability & Power Quality Benchmarking, Distribution Sector Resilience, Responsiveness & Cost Efficiency)



Customer Engagement Phase 2 (Draft Plan)

Customer feedback on key trade-offs and social permission for the draft plan



2025-2029 Custom Incentive Rate Application

Performance incentives provide upfront benefits to customers (rate mitigation) and place the risk/reward emphasis on the delivery of performance outcomes.



20 | Privileged & Confidential Toronto Hydro

GRID & OPERATIONS PLANS 2025-2029 INVESTMENT DRIVERS



Customer Engagement – Phase 1 Needs and Priorities

Price & Reliability

Top priorities. Despite a continued emphasis on price, reliability is becoming more important to low-volume customers.

New Technology

Support for investments in new technology that will make the system better and reduce costs even if the benefits aren't immediate

System Capacity

Support for investments in system capacity infrastructure to ensure customers in high growth areas do not experience a decrease in reliability.

System Stewardship: Grid & Operational Performance



Continue to deliver safe and reliable/resilient service

Modernization



Adopt technology to modernize our grid and operations

City Growth & Electrification



Connect and serve growing demand

GRID & OPERATIONS PLANS KEY INVESTMENT CATEGORIES

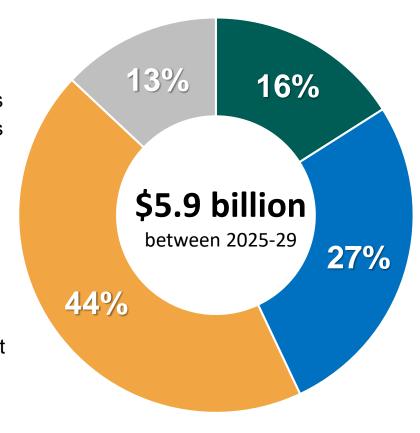


General Plant

Investments in vehicles, work centers and IT to keep the business running and reduce Toronto Hydro's emissions.

Sustainment & System Stewardship

Investments to upkeep old equipment that is in poor condition and replace outdated equipment.



Modernization

Investments in technology to get more use out of existing equipment, and build a smarter, more efficient and reliable grid.

City Growth & Electrification

Investments in capacity to power the growing city and serve customers' growing and changing needs for electricity.

BUSINESS PLAN & RATE APPLICATION STRATEGIC PARAMETERS (APPROVED)



Capital Program

2025-2029 Capital Expenditures



Operational Plan

2025-2029 Operational Expenditures



Distribution Rates

2024-2029 Average Annual Residential Rate Increase (without rate smoothing)

BUSINESS PLAN & RATE APPLICATION STRATEGIC PARAMETERS (APPROVED)



Capital Program

2025-2029 Capital Expenditures



Operational Plan

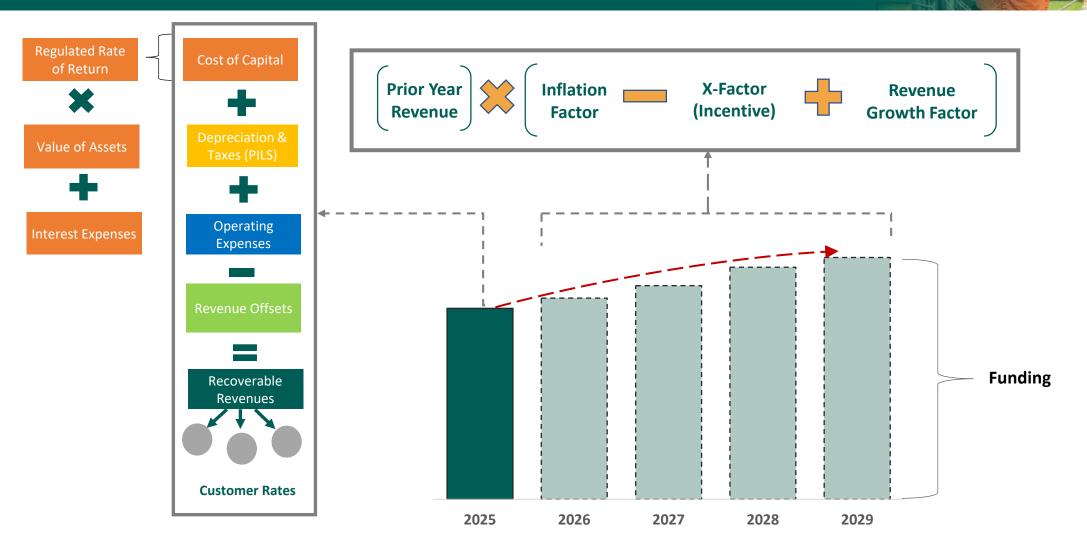
2025-2029 Operational Expenditures



Distribution Rates

2024-2029 Average Annual Residential Rate Increase (without rate smoothing) ~7.2% smoothed

RATE FUNDING FORMULA HOW IT WORKS ————



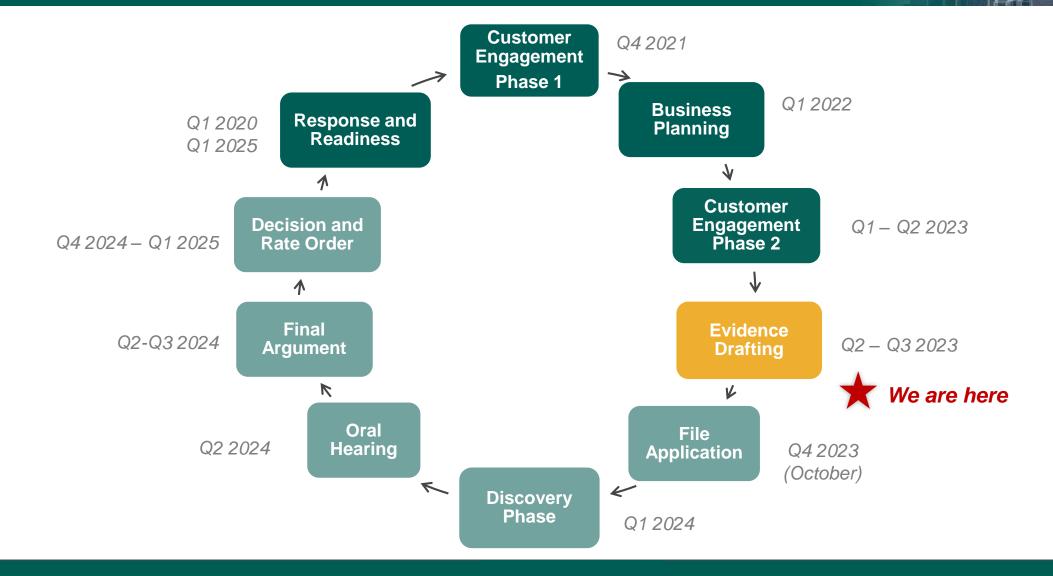
25 | 2023-2025 Business Plan Toronto Hydro

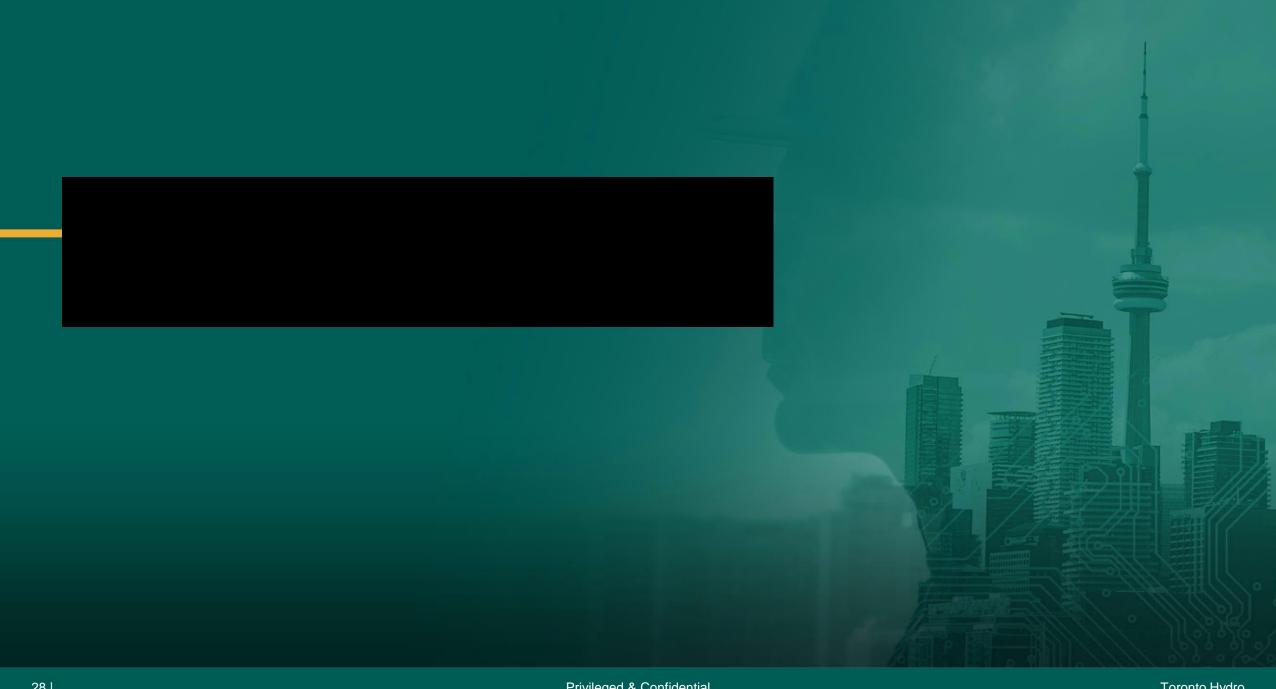
2025-2029 RATE APPLICATION CUSTOM RATE FRAMEWORK -



Element	2025-2029 Custom IR Application
Custom Revenue Cap Index (CRCI)	Prior Year Revenue escalated by <i>Inflation (I-factor) - Incentive (X-factor) + Revenue Growth Factor (RGF)</i>
Revenue Growth Factor (RGF)	Escalates revenue annually to enable Toronto Hydro to deliver its capital and operations programs over the outer years of the rate period (i.e. 2026-29)
Inflation (I-Factor)	Based on standard OEB methodology with a custom Toronto-specific index for labour to reflect the cost pressures of attracting and retaining talent in a competitive urban environment.
Incentive (X-Factor)	Provides upfront benefits to customers (rate reduction) and the utility an opportunity to earn an incentive by achieving outcomes tied to metrics and targets on the 2025-2029 custom scorecard.
New Deferral and Variance Accounts	Demand Related Variance Account (reconciles cost and revenue variances related to changes in customer demand); Locates Variance Account (reconciles cost variances related to Bill 93)

RATE APPLICATION PROJECT LIFECYCLE





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RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

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INTERROGATORY 1A-CCC-2

4 Reference:

Exhibit 1A

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6 **QUESTION (A) - (C):**

- a) Please provide a complete list of all external consultants/lawyers Toronto engaged to assist it in
 the development of the Application and pre-filed evidence;
- b) For each engagement please provide the nature of the work and the retainer and terms ofreference;
- c) Please provide the budgeted cost for the work for each engagement and the costs incurred to date. Please indicate how the costs are to be recovered;

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RESPONSE (A) - (C):

The table below includes a list of all the consultants Toronto Hydro engaged to prepare expert evidence for this rate application, the costs incurred to date (as of year-end 2023), and notes whether the expert was engaged pursuant to an RFP. The total expected costs of the consultants depends on the work required by these third parties to answer interrogatories, and the extent to which the OEB and intervenors seek to have these third parties attend the hearing and be involved with other procedural steps in this application. With the exception of certain studies undertaken in the normal course of business, the cost of this work is managed through the consulting budget in Appendix 2-M and is to be recovered through the Regulatory Affairs segment of the Public, Legal and Regulatory Affairs program at Exhibit 4, Tab 1, Schedule 18. The budgeted costs for legal expenses are also set out in Appendix 2-M. Please refer to 1B-SEC-11 for retainers for external service providers engaged to prepare expert evidence.

Page **2** of **4**

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Expert	Nature of Work /Evidence Reference	Evidence Reference	RFP	Actual Costs Incurred to Date (2023)	
Innovative Research Group	Customer Engagement Study	Exhibit 1B, Tab 5, Schedule 1, App A	Yes	\$760,661	
Clearspring Energy Advisors	Total Cost and Reliability Benchmarking	Exhibit 1B, Tab 3, Schedule 3, App A	Yes \$588,536		
	Load Forecast EV & DER Integration	Exhibit 3, Tab 1, Schedule 1, Appendix J	Yes	۶۵۵,۵۵۵ ا	
UMS Group Inc.	Unit Cost Benchmarking	Exhibit 1B, Tab 3, Schedule 3, App C	No	\$276,300	
Scott Madden Associates	Rate Framework Review	Exhibit 1B, Tab 2, Schedule 1, Appendix A	Yes	\$97,780 (USD)	
Guidehouse	Lead/Lag Study	Exhibit 2A, Tab 3, Schedule 2	No	\$92,000	
Concentric Advisors	Financial Useful Lives	Exhibit 2A, Tab 2, Schedule 1, Appendix D	Yes	\$225,857	
EA Technology	Asset Condition Assessment (ACA) Review	Exhibit 2B, Section D4, Appendix C	No	\$53,500 (USD)	
Element Energy	Future Energy Scenarios	Exhibit 2B, Section D4, App B	Yes	\$125,000 ¹	
Gartner Consulting	IT Cost & Maturity Benchmarking	Exhibit 2B, Section D8, App A	No	\$137,500	
Stantec	Climate Change Vulnerability	Exhibit 2B, Section D2, App A	Yes	\$29,374	
Mercer Canada	Compensation Benchmarking	Exhibit 4, Tab 4, Schedule 5	Yes	\$79,999.75	

3 QUESTION (D):

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- 4 Please explain, in detail, how Toronto Hydro determined which areas of the Application should be
- 5 reviewed and validated by external experts;

¹ Toronto Hydro notes that the cost noted here is only for the preparation of the report. For details on the model development and implementation costs, please see Exhibit 2B-Staff-156.

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1A-CCC-2 FILED: March 11, 2024

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RESPONSE	(D)	۱:

- 2 Toronto Hydro used experience and professional judgment to determine which areas of the
- 3 application would benefit from review and/or validation from external consultants. Factors
- 4 included: guidance provided by the OEB in the RRF, the Handbook for Utility Rate Applications and
- the Filing Requirements; what may be helpful to the OEB in understanding and assessing Toronto
- 6 Hydro's application; and precedent from prior proceedings. In addition, some studies were
- 7 undertaken in the normal course of business and not for rate application business such as the
- 8 Climate Change Vulnerability Assessment.

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QUESTION (E):

- Did Toronto Hydro develop an overall budget for this external work. If so, please indicate what
- that budget was and how it was developed. If not, why not?

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RESPONSE (E):

- 15 The current budget for this work is included in the updated Appendix 2-M (found at Appendix A to
- the response to Interrogatory 4-SEC-110). Please note that not all of the third-party studies and
- 17 reports noted above formed part of this budget; some studies (e.g. Mercer Non-Executive
- 18 Compensation and Benefits Review and Stantec Climate Change Vulnerability) were done within the
- normal course of business and are not reflected in the budget.

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QUESTION (F):

- 22 Please indicate whether each piece of work was subject to an RFP process. In those cases where
- there was no RFP please explain why.

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RESPONSE (F):

- 26 Please refer to the table in the response to Part (a) (c) above for a summary of which consultants
- were retained through an RFP Process. In respect of the consultants that were not:

Toronto Hydro-Electric System Limited EB-2023-0195 Interrogatory Responses 1A-CCC-2

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FILED: March 11, 2024

- UMS Group Inc. was engaged due to its depth of experience and understanding of
 Ontario's regulated electricity sector, and its previous experience working with Toronto
 Hydro and other large Ontario distributors on unit cost benchmarking.
 - Gartner Canada Inc. was engaged due to its previous experience working with Toronto
 Hydro on IT benchmarking and because the firm offers access to the world's largest data
 set for organizational IT spending and staffing.
 - Guidehouse was engaged due to its depth of experience and understanding of Ontario's regulated electricity sector, and its previous experience performing lead-lag studies for Toronto Hydro in the 2015 and 2020 custom rate applications.
 - EA Tech is the industry leader in Asset Condition Assessment (ACA) and has been supporting Distribution Network Operators in UK develop and implement a Common Network Asset Indices Methodology (CNAIM), which Toronto Hydro adopted and continues to implement. EA Tech was engaged due to its previous experience with Toronto Hydro's adoption of CNAIM, and due to their knowledge and expertise in this field.

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QUESTION (G):

- Did Toronto Hydro retain any external consultants and lawyers to undertake work related to the
- 18 Application that has not been included with the Application and pre-filed evidence?

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RESPONSE (G):

- 21 Anything not included in the Application and pre-filed evidence before the OEB does not form the
- basis of Toronto Hydro's proposal, is irrelevant and provides no probative value.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

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INTERROGATORY 1A-CCC-3

4 Reference: Exhibit 1A

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QUESTION:

- 7 Please provide all documents provided to employees related to the development of the Business
- 8 Plan and budgets that form part of this Application.

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RESPONSE:

Toronto Hydro respectfully declines to provide disclosure of the requested information on the basis that this information is irrelevant and provides no probative value to the OEB in deciding the issues in this proceeding. The information sought is contained throughout the evidence. The strategic direction adopted and provided in preparing the 2025-2029 capital and operational investment plans presented in this application is contained within the integrated business planning sections of Exhibit 2B, Section E2 at page 5 and Exhibit 4, Tab 1, Schedule 1 at page 24. Please also see Toronto Hydro's responses to: (i) 2B-SEC-32 for a chronology of the integrated planning process, (ii) 2B-SEC-33 for a description of the budget and price limits that the utility adopted to guide the planning process; and (iii) 4-CCC-58 for a description of the workforce planning aspects of the process.

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RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

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- **INTERROGATORY 1A-CCC-4**
- 4 Reference: Exhibit 1A

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- 6 QUESTION:
- 7 Please provide Toronto Hydro's most recent Business Plan. Please provide all Business Plans
- 8 produced during the period 2020-2023.

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10 **RESPONSE**:

- 11 The business plan that underpins this application is filed in the response to 1A-CCC-1. Toronto Hydro
- declines to provide the historical business plans (i.e. 2020-2022) as they are irrelevant and provide
- limited to no probative value in deciding the issues in this proceeding.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

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INTERROGATORY 1A-CCC-5

4 References: Exhibit 1A, Tab 3, Schedule 1, Pages 4-7

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6 Preamble:

- 7 "Toronto Hydro indicated that intervenors are asking the OEB panel to either make changes to
- 8 generic policy through a particular utility's rate application or to fetter the discretion of a future
- 9 panel. Toronto Hydro also submitted that its proposed ratemaking formula is structurally the same
- as the one approved in its 2015-2019 Custom IR proceeding. The OEB notes that the Custom IR
- approach taken has required extensive evidence and time to consider the details provided.
- Toronto Hydro is encouraged to consider an alternative approach in the future that might be more
- efficient in establishing the revenue requirement for the base year and following years as well as
- meeting OEB RRF objectives, and improving the balance of risk between customers and the utility.
- 15 Toronto Hydro should not assume that future panels will continue to accept Toronto Hydro's
- 16 current proposed Custom IR Framework."

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QUESTION (A) AND (B):

- a) Toronto Hydro sets out OEB directions specified in the 2020-2024 Decision. Does Toronto Hydro not consider the above a Direction from the OEB in the 20202-2024 Decision? If not, why not?
- b) Please explain how its proposed plan is more efficient in establishing the revenue requirement for the base year and following years as well as meeting OEB RRF objectives and improving the balance of risk between customers and the utility.

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RESPONSE (A) AND (B):

27 Please see Toronto Hydro's response to interrogatory 1B-SEC-10.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

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INTERROGATORY 1A-CCC-6

4 References: Exhibit 1A, Tab 3, Schedule 1, Page 8

5 Exhibit 2B, Section E5.1

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QUESTION:

- 8 Toronto Hydro proposes to increase its basic connection allowance for certain customer classes
- 9 from \$1396 to \$3059. Please explain to what extent Toronto Hydro undertook customer
- 10 engagement with respect to this change.

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RESPONSE:

- 13 The basic connection allowance was not specifically identified in the customer engagement
- process. The proposal to increase the basic allowance, however, is consistent with customer
- priorities described in the Customer Engagement Report (Exhibit 1B, Tab 5, Schedule 1, Appendix
- A), including: ensuring reliable electrical service (e.g. updating the basic connection to current
- 17 standards), and enabling customers to access electricity services (e.g. making new service
- connection more affordable). lease see Exhibit 2B, Section E5.1, page 20 for further details.

- 20 As per OEB's Distribution System Code ("DSC"), Section 2.4.8, Toronto Hydro will provide public
- 21 notice of any approved change to the basic connection allowance as part of the implementation of
- the revision to Toronto Hydro's Conditions of Service.

RESPONSES TO CONSUMERS COUNCIL OF CANADA INTERROGATORIES

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INTERROGATORY 1A-CCC-7

References: Exhibit 1A, Tab 3, Schedule 1, Appendix A

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- 6 Toronto Hydro has set out in Appendix A summaries of the revisions to its Conditions of Service
- 7 since its last rebasing.

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9 QUESTION (A):

a) Please identify which of those changes apply to residential customers;

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12 **RESPONSE (A):**

Table 1 below highlights changes that apply to residential customers:

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Table 1 – Summary of Changes to Conditions of Service Applicable to Residential Customers

Rev.#	Effective Date	Section #	Section Title	Summary of Change/Rationale	
Rev.	Jan 1,	1.8	Disputes	Revised the website address that refers to	
19	2020			the Dispute Resolution process, which is on	
				Toronto Hydro's website.	
		2.2	Disconnection	Added a statement that a customer must	
				pay any outstanding arrears prior to the	
				removal of Toronto Hydro equipment.	

Rev.#	Effective Date	Section #	Section Title	Summary of Change/Rationale	
		2.2.1	Disconnection	Revised statements:	
			and	- from " a disconnect notice has been	
			Reconnection –	delivered to the Customer" to " a	
			Process and Charges	disconnect notice has been received by the Customer",	
				- from " on the third business day after	
				mailing." to " on the third business day	
				after the date on which the notice was printed.", and	
				- customer must remedy the condition	
				within "seven calendar days" to "a	
				reasonable period".	
				Added a statement not to disconnect an	
				occupied residential property for non-	
				payment during a Disconnection Ban Period.	
		2.4.3	Deposits	Added a statement that a security deposit	
				for a residential account may be waived	
				where the customer enrolls in an equal	
				monthly payment, provided that a deposit	
				may otherwise be required as per the	
				Distribution System Code.	
		2.4.5	Payments and	Revised statements:	
			Overdue	- the interest rate used to determine any	
			Account	late payment charges, and	
			Interest Charges	- from "Pre-Authorized Payments" to "Pre- Authorized Debits".	
				7.66.15.1264 565165	
				Added a statement that bills are to be paid	
				in full within 20 days of the statement	
				date.	

Rev.#	Effective Date	Section #	Section Title	Summary of Change/Rationale	
Rev.	Mar 1,	2.2.1	Disconnection	Revised statements:	
19.1	2020		and Reconnection – Process and Charges	- the minimum payment period was amended as 14 calendar days from the date on which the disconnection notice is received before a customer can be disconnected for non-payment, and - where a disconnection notice was sent by mail, the period is to be revised to the fifth calendar day after the date on which the notice was printed.	
				Added statements: - before issuing a disconnection notice for non-payment, an account overdue notice shall be delivered to the customer, and - the customer responsible for a disconnection may be charged for reconnection costs and reasonable costs for repairs of the distributor's physical assets attached to the property in reconnecting the property.	
		2.4.3	Deposits	Revised statements: - the calculation method in determining the amount of an account security deposit, and - the minimum time period from "5 years" to "3 years" for good payment history for non-residential customers that have a demand less than 50 kW.	

Rev.#	Effective Date	Section #	Section Title	Summary of Change/Rationale
		2.4.5	Payments and	Revised statements:
			Overdue	- payment plans are available to customers,
			Account	such that equal monthly payment plans are
			Interest Charges	to be offered to residential customers and
				to general service less than 50 kW
				customers, and the equal monthly payment
				plans may not be offered under specified
				conditions, and
				- bills are to be paid in full within 24 days of
				the statement date.
Rev.	Jan 1,	2.1.5	Relocation of	Revised to reflect the OEB's new relocation
20	2021		Plant	cost recovery standard.
		2.2.1	Disconnection &	Revised to better align with the new
			reconnection	Distribution System Code (DSC)
				disconnection and reconnection
				amendment.
		2.3.4.2	Supply Voltage	Revised to reflect the equivalent service
				sizes of the demand loads offered to
				Customers when supplied from secondary
				street circuits on road allowance.
		2.3.7.1	Metering -	Added conditions in the section to give
			General	Toronto Hydro the right to operate on
				Customer-Owned switches when conducting
				meter work, and Toronto Hydro is not be
				liable for any damages or losses sustained
				resulting from inadequate
				maintenance of Customer-Owned
				equipment and infrastructure.
		2.4.3	Deposits	Revised the wording in the Conditions of
				Service to better align with the Distribution
				System Code (DSC) and clarify the time
				period over which a good payment history
				must be on file for waiving of new or
				increased deposit amounts.

Rev.#	Effective Date	Section #	Section Title	Summary of Change/Rationale	
Rev.	Jan 1,	2.2.1	Disconnection &	Expanded the wording in the Disconnection	
21	2022		Reconnection	& Reconnection – Process and Charges	
				section to describe in greater detail the	
				disconnection process that Toronto Hydro	
				follows in accordance with the applicable	
				regulatory requirements.	
		2.3.4.2	Supply Voltage	Modified section 2.3.4.2 Supply Voltage to	
				provide more detail with respect to available	
				supply voltages.	
		2.3.4.3	Supply Offerings	Introduced a new section entitled "Supply	
				Offerings" to provide more detail regarding	
				Toronto Hydro's supply offering in the public	
				road allowance and transformer offerings on	
				private property.	
		2.3.4.4	Number of	Renumbered and renamed former section	
			Connections to	2.3.4.3 to 2.3.4.4 "Number of Connections	
			Toronto Hydro	to Toronto Hydro's Distribution System" and	
			Distribution	modified the revision to clarify Toronto	
			System	Hydro's policy with customer requests for	
				diversity of supply.	
		2.4.3	Deposits	For the purpose of satisfactory credit	
				checks, revised the acceptable Equifax	
				Credit commercial scores for Business	
				customers to align with Equifax scoring for	
				commercial customers.	
				Revised the wording to further clarify the	
				requirements for a security deposit to be	
				returned to the Customer or Consumer	
				within six weeks of closure of Customer or	
				Consumer's account and when a Consumer	
				or Customer moves from Standard Supply	
				Service ("SSS") to a competitive retailer	
				where the retailer is performing the billing	
				function (retailer consolidated billing), for all	
				account types.	

Rev.#	Effective Date	Section #	Section Title	Summary of Change/Rationale	
		Tables 1	Civil Ownership	Merged Tables 1.1, 1.2, 1.3, 1.4 and 1.5 as	
		&2	Demarcation	Table 1 for ease of reference.	
			Point	Specified the ownership demarcation	
				point for civil infrastructure between the	
				Customer and Toronto Hydro based on the	
				customer class and supply method.	
Rev.	Jan 1,	1.7.3	Tree and	Clarified Toronto Hydro and Customer's	
22	2023		Vegetation	responsibilities with respect to tree	
			Management	trimming and vegetation management on	
				both public road allowance and private	
				property.	
		2.2.1	Disconnection	Expanded the wording in the Disconnection	
			and	& Reconnection – Process and Charges	
			Reconnection	section to reflect Toronto Hydro's new	
				policy of providing eligible low-income	
				customers (ELIC) one free disconnection and	
				reconnection in a rolling 12-month period.	
		2.4.4.1	Rate	Added a new section outlining Toronto	
			Reclassification	Hydro's rate reclassification policy	
		2.4.5	Payments and	Revised the provision to clarify the	
			Overdue	application of non-sufficient fund fees.	
			Account		
			Interest		
			Changes		
		Ref 6	Metering	Clarified Toronto Hydro's meter locations	
			Requirements	requirements.	
			750 Volts of		
			Less – Toronto		
			Hydro meter		
			locations		
Rev.23	Jan 1,	1.4	Amendments	Updated the method of notifying Customers	
	2024		and Changes	about Conditions of Service and Rates	
				changes from notice by newspaper to notice	
				by Toronto Hydro's website and social	
				media platforms, as needed.	

Rev.#	Effective Date	Section #	Section Title	Summary of Change/Rationale	
	1.6		Customer Rights	Expanded wording to clarify Customer's	
				rights when making use of Green Button's	
				"Connect My Data" and "Download My	
				Data" to access and download their usage	
				data.	
		1.7.3	Tree and	Expanded wording to clarify the need for	
			Vegetation	Customers to hire authorized persons, such	
			Management	as utility arborists, to perform the tree	
				trimming on private property for their own	
				safety, the safety of the public, and the	
				safety of the distribution system.	
		2.1.5 Relocation of Expande		Expanded wording to clarify the	
			Toronto Hydro-	requirements for Toronto Hydro's relocation	
			Owned Assets	of Toronto Hydro-owned assets.	
		2.3.6	Emergency	Clarified Toronto Hydro's emergency backup	
			Backup	generation facilities requirements.	
			Generation		
			Facilities		

2 QUESTION (B):

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b) For those that have changed please explain the rationale for the changes;

5 **RESPONSE (B):**

6 Please see response to part (a) of this interrogatory.

QUESTION (C):

c) Please explain the extent to which Toronto Hydro engaged its customers regarding those changes;

RESPONSE (C):

Per Distribution System Code 2.4.8, Toronto Hydro provided advanced public notice for a minimum period of 30 calendar days (typically from the end of October to mid-December, dependent on

Toronto Hydro-Electric System Limited EB-2023-0195 Interrogatory Responses 1A-CCC-7

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- customer billing dates) for any changes to its Conditions of Service. Public notice was
- 2 communicated through bill inserts, the Toronto Hydro website, and social media. During this
- 3 period, customers are provided the opportunity to ask questions and provide feedback, which is
- 4 addressed prior to the Conditions of Service being published.

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QUESTION (D):

d) Please explain the extent to which Toronto Hydro has communicated those changes to its customers.

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RESPONSE (D):

11 Please see response to part (c) of this interrogatory.

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QUESTION (E):

e) What relief in Toronto Hydro seeking with respect to its Conditions of Service through this Application?

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RESPONSE (E):

- Toronto Hydro does not seek relief with updates to the Conditions of Service. The Conditions of
- Service are updated to improve accuracy, clarity and to ensure alignment with applicable laws,
- 20 codes, and regulations.

Page 1 of 3

RESPONSES TO POLLUTION PROBE INTERROGATORIES

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INTERROGATORY 1A-PP-1

References: Exhibit 1A, Tab 3, Schedule 1, Page 3

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- 6 <u>Preamble:</u> THESL indicates that relative to the previous plan, this rate plan "Enhanced the capacity
- 7 planning process consider electrification drivers and municipal energy plans in producing the
- system peak load forecast that underpins the 2025-2029 Investment Plan."

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QUESTION (A):

a) Please describe what THESL has already completed (if anything) to enhance the capacity planning process to consider electrification drivers and municipal energy plans in producing the system peak load forecast that underpins the 2025-2029 Investment Plan.

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RESPONSE (A):

- Please refer to Exhibit 2B, Section D4 for a detailed description of the enhancements made to
- 17 Toronto Hydro's capacity planning process to consider electrification drivers and the Municipal
- 18 Energy Plans.

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QUESTION (B):

b) Please explain why efforts over the current (2020-2024) rate term (and in preparation for this application) were not a sufficient foundation to prepare the Investment Plan, requiring incremental focus in the new rate period (2025-2029).

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RESPONSE (B):

- 26 The statement that Toronto Hydro has not laid a sufficient foundation to prepare for the
- investment plan is incorrect. In preparation for the 2025-2029 rate application, it became
- 28 necessary to focus on specific aspects of electrification. For additional details on electrification
- drivers, please see Exhibit 2B Section D4 "Capacity Planning, Growth & Electrification" pp. 1-2, and

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- Section D4.1.1 "System Peak Demand Forecast" pp.2-6. For additional details on system needs,
- 2 please see Exhibit 2B, Section E7.4, Stations Expansion, which discusses needs beyond the 2025-
- 3 2029 period requiring early action, consideration of short circuit capacity constraints, and
- 4 alignment with recommendations from Regional Planning.

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QUESTION (C):

c) The Investment Plan (and Distribution System Plan) underpin the THESL application for the 2025-2029 term. Please explain how the OEB can approve the application and related budgets at this time if there is incremental information that is not available at this point supporting investments that will be made over the 2025-2029 period?

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RESPONSE (C):

Please refer to the evidence in Exhibit 1B, Tab 2, Schedule 1 starting on page 36 for an explanation of (i) the uncertainty factors that Toronto Hydro faces with respect to demand-related expenditures and revenues and (ii) the regulatory mechanism – known as the Demand Relative Variance Account, that Toronto Hydro proposes to manage these uncertainties in the next rate period and protect customers and the utility's ability to deliver the 2025-2029 Investment Plan objectives.

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QUESTION (D):

d) Has THESL included opportunities to share (or leverage) investments from other stakeholders (including building owners, City of Toronto, industrial sites, etc.) on Distributed Energy Resources over the 2025-2029 Rate term. If no, please explain why not. If yes, please provide a summary, the process used and what results (cost avoidance and kW/kWh) are forecasted to be achieved.

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RESPONSE (D):

Toronto Hydro has not entered into new DER ownership arrangements with third-parties in this rate-period and has not proposed such arrangements for 2025-2029. Toronto Hydro is focused on procuring DER services if and when such services can provide system benefit that is quantifiable

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- and credible as part of its Local Demand Response investments (Exhibit 2B, Section E7.2). Should an
- 2 opportunity be identified in the future where such an arrangement would be cost-effective as
- 3 compared to a conventional distribution system solution, Toronto Hydro will investigate the
- 4 opportunity.

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RESPONSES TO POLLUTION PROBE INTERROGATORIES

1	RESPONSES TO POLLUTION PROBE INTERROGATORIES
2	
3	INTERROGATORY 1A-PP-2
4	Reference: Exhibit 1A, Tab 3, Schedule 1, Page 4
5	
6	Preamble:
7	THESL indicates that it has "Enhanced the load forecast to consider electrification drivers and
8	changes to the availability of conservation and demand management ("CDM") savings in producing
9	the revenue forecast that underpins to 2025-2029 rates"
10	
11	QUESTION (A):
12	a) Please provide what CDM results THESL will have achieved by end of the 2024 rate term
13	against the total achievable CDM results and what potential remains, by sector if possible
14	
15	RESPONSE (A):
16	Please refer to Exhibit 9, Tab 2, Schedule 3 and 9-Staff-354 which indicates CDM results THESL has
17	achieved as part of LRAMVA by 2024.
18	
19	QUESTION (B):
20	b) Please indicate what CDM results (total and incremental to those forecasted to the end of
21	the current rate plan) are forecasted to be achieved by year of the 2025-2029 rate plan.
22	Please indicate what portion of the total potential achievable CDM results that will
23	represent.
24	
25	RESPONSE (B):
26	The Province's CDM Framework for 2025-2029 is not yet finalized. Since 2019, the role for LDCs in
27	CDM has reduced significantly relative to prior periods. Accordingly, in this Application, Toronto

Hydro is not forecasting LDC-led savings as part of CDM Framework during the 2025-2029 period.

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QUESTION (C):

 Please explain why only CDM is included in the above noted item and not the broader scope of DER.

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RESPONSE (C):

- 6 The reference to "electrification drivers" includes DERs. Toronto Hydro includes DER impacts in its
- 7 load forecast. Please refer to Exhibit 3, Tab 1, Schedule 1, Appendix J for a description of the
- 8 integration of DER impacts into the load forecast.

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RESPONSES TO POLLUTION PROBE INTERROGATORIES

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INTERROGATORY 1A-PP-3

Reference: DER definition from National Standard Practice Manual – NESP

(nationalenergyscreeningproject.org)

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7 Distributed Energy Resources (DERs) are resources located on the distribution system that are

generally sited close to or at customers' facilities. DERs include EE, DR, DG, DS, EVs, and increased

electrification of buildings. DERs can either be on the host customer side of the utility

interconnection point (i.e., behind the meter) or on the utility side (i.e., in front of the meter). DERs

are mostly associated with the electricity system and can provide all or some of host and/or

support the utility system by reducing demand and/or providing supply to meet energy, capacity,

or ancillary services (time and locational) needs of the electric grid.

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QUESTION (A):

Please provide the definition of DER that THESL is using.

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RESPONSE (A):

19 Toronto Hydro defines Distributed Energy Resource Requirements under Section 1.1 of the Toronto

20 Hydro Conditions of Service Reference 3, revision #7 January 1, 2024. A distributed energy

resource (DER) "is any source of electric power that is connected to the distribution grid of a Local

Distribution Company (LDC) that distributes electrical power to Customers and Consumers. A DER

operator shall be a Customer, Consumer or Supplier within the Toronto Hydro service area which is

generating electricity for exporting power to the Toronto Hydro distribution grid or to displace

their own load"1.

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 $^{^1\,}https://www.torontohydro.com/documents/d/guest/reference-3-distributed-energy-resource-requirements$

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QUESTION (B):

- 2 Regulatory initiatives including the Future for Energy Innovation have leveraged the NSPM for DER
- best practice information and approach. Please indicate what variance (if any) there is between the
- 4 NSPM definition for DERs, what THESL is using and the potential impact (e.g. are some categories
- 5 of DER excluded).

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7 **RESPONSE (B):**

- 8 Toronto Hydro's definition of DERs defined in a) above is consistent with the concept of distributed
- 9 generation by NESP. Concepts like EV's are currently considered as a load and are excluded from
- the DER definition (although this can change as applications like vehicle-to-grid mature).

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RESPONSES TO POLITION PROBE INTERROGATORIES

1	RESPONSES TO POLLUTION PROBE INTERROGATORIES
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3	INTERROGATORY 1A-PP-4
4	Reference: Exhibit 1A, Tab 3, Schedule 1, Appendix A
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6	"Customers having a non-coincident peak demand equal to or greater than 5 MW shall be charged
7	their share of the capital contribution for a new or modified transmitter-owned connection
8	facility."
9	
10	QUESTION (A):
11	a) Please explain how the Capital Contribution Policy change would impacts customers (in
12	whole or part) planning to install DERs that could benefit the system.
13	
14	RESPONSE (A):
15	The changes to section 2.1.2.2 of Toronto Hydro's Conditions of Service identified in Revision #19
16	effective January 1, 2020 reflected the enactment of Distribution System Code ("DSC") sections
17	3.2.4A and 3.6.1 as the result of the EB-2016-0003 consultation. In Toronto Hydro's assessment,
18	the relevant changes do not have any specific impact upon customers planning to install distributed
19	energy resources ("DERs").
20	
21	QUESTION (B):
22	b) Please explain if this Capital Contribution Policy change is applied broadly regardless of the
23	whether a customer (in whole or part) is planning to include or add a DER that could
24	benefit the system.
25	
26	RESPONSE (B):
27	Toronto Hydro applies the DSC requirements which triggered the Revision #19 updates to the

utility's Conditions of Service and capital contribution policy in accordance with the scope set out in

those requirements. Toronto Hydro also notes that the DSC prescribes the application of Chapter 3

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cost responsibility requirements to all generation facilities, including storage facilities, connecting to a distributor's distribution system.¹

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QUESTION (C):

c) Please explain how this Capital Contribution Policy change aligns with the approach being developed for the OEB BCA Framework.

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RESPONSE (C):

- 9 As noted in subpart (a), the historical changes to Toronto Hydro's capital contribution policy and
- associated Conditions of Service provisions in Revision #19 shown in Exhibit 1A, Tab 3, Schedule 1,
- 11 Appendix A were triggered by DSC amendments resulting from EB-2016-0003 in 2018 and 2019,
- which precede the OEB's Benefit-Cost Analysis ("BCA") Framework consultation launched on
- 13 September 20, 2023 by several years. Toronto Hydro is monitoring the BCA Framework
- 14 consultation for any outcome that may require the utility to make future changes to its policies.

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QUESTION (D):

d) Please explain how (if at all) THESL policies and charges encourage customers to include DERs that could provide benefits to the system and how those will be managed during the 20205-2029 rate term to unlock those system benefits.

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RESPONSE (D):

- Please see the Exhibit 2B, Section E7.2.1 for a description of Toronto Hydro's Flexibility Services
- segment, including a proposal to procure up to 30 MW of demand response capacity and Toronto
- 24 Hydro's Benefit Stacking Transmission and Distribution Pilot ("Benefit Stacking Pilot") at pages 12-
- 13. The Benefit Stacking Pilot project explores how customer-owned DERs can provide services to

¹ Distribution System Code (August 2, 2023), s. 6.2.31.

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- both the distribution grid and transmission/bulk system using an efficient single pathway that
- 2 works with existing market mechanisms.²

² The Benefit Stacking Pilot is supported by the IESO's Grid Innovation Fund and the OEB's Innovation Sandbox. Toronto Hydro has partnered with Power Advisory LLC and Toronto Metropolitan University's CUE for the project.