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April 2, 2024 **VIA E-MAIL**

Ms. Nancy Marconi
Registrar
Ontario Energy Board

Dear Ms. Marconi:

Re: Toronto Hydro-Electric System Limited (THESL)
Board File No.: EB-2023-0195
VECC Estimated Times for Technical Conference Panels

In accordance with Procedural Order No. 2 in the above noted proceeding we are providing our estimated times for examination at the upcoming technical conference.

Panel	Estimate
Panel 1: Distribution Capital & Maintenance	45 minutes
Panel 2: General Plant & Operations	30 minutes
Panel 3: Regulatory, Finance & Human Resources	140 minutes
Panel 4: Expert - Clearspring Energy	15 minutes

To be helpful, and in anticipation that the amount of time allotted to parties may be constrained, we have also included some of our clarification questions in writing. We hope this will be of assistance to panel members as they prepare for the conference. Please be aware that these questions are only a portion of our anticipated examination for the conference.

Sincerely,

M. Garner

Mark C. Garner Digitally signed by Mark C. Garner
Date: 2024.04.02 16:32:50 -04'00'

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TORONTO HYDRO-ELECTRIC SYSTEM LIMITED'S
2025-2029 RATE APPLICATION (EB-2023-0195)
VECC'S TECHNICAL CONFERENCE QUESTIONS

PANEL #1

VECC TCQ-1 (EV Charging Infrastructure)

REFERENCE: IRR 3-DRC 14 b), c) & d)
Exhibit 2B, Section E7.4, page 17

PREAMBLE: DRC 14 b) states:
"*Toronto Hydro is unable to disaggregate EV charging infrastructure-specific costs from other cost drivers in these capital and operation demand-related programs."*

DRC 14 c) states:
"In the 2020-2024 rate period, Toronto Hydro received a Natural Resources Canada ("NRCAN") contribution of $255,000 related to the installation of EV charging infrastructure for Fleet and employee vehicles."

DRC 14 d) states:
"*Toronto Hydro continues to be of the opinion that these forecasts are reasonable, given future uncertainties in load materializing. Toronto Hydro has proposed a Revenue cap and Demand-Related DVA to address this concern*".

a) Exhibit B2, Section E7.4 (page 17) indicates that THES' planned capital spending for 2025-2029 includes spending related to the installation of EV charging infrastructure? Has THES included any capital contributions from NRCAN associated with this spending?

b) Is any of the 2020-2024 or 2025-2029 spending on EV charging infrastructure associated with the installation of public EV charging stations that will be owned by THES?

   i. If yes, please outline THES's plans with respect to public EV charging stations (e.g., number of stations planned to be in-service each year and the kW rating for such stations).

   ii. If yes, where are the kWh/kVA associated with these stations included in THES's load forecast, what is the forecasted associated kWh/kVA usage for each year and what is the distribution revenues associated with these stations?

c) With respect to DRC 14 d), is the a "Revenue cap and Demand-Related DVA" referenced here the same as the "Demand-Related Variance Account (DRVA)" referenced in Exhibit 9, Tab 1, Schedule 1, page 40?

VECC TCQ-2 (EV Load Profile)

REFERENCE: IRR 3-VECC 45 a)

PREAMBLE: VECC 45 a) states:
"*The EV battery will be further depleted, assuming the same driving distances, during cold weather versus mild or hot weather. This will require more kWhs at charging. The average kWs in each hour will, therefore, increase by a corresponding amount to deliver the energy to the EV battery*."

a) Please explain why the average kW would increase when the kW used in a charging session will be determined by the lesser of: i) the EV charging station kW rating and ii) the charging speed capability of the EV's battery? Won't the requirement for more kWh increase the charging time required as opposed to the average kW used?

VECC TCQ-3 (Renewable Energy Impacts)

REFERENCE: IRR 3-VECC 48 f)
IRR 3-VECC 45 c)
Exhibit 3, Tab 1, Schedule 1, page 24

PREAMBLE: VECC 48 f) asked for the 2022 energy delivered to THESL by rate class under the net metering program and what this represented as a portion of the total renewable energy produced in 2022 (per Table 27) for each customer class. The response referred to VECC 45 c) which in turn referenced Clearspring working papers filed on a confidential basis.

Exhibit 3 states:
"The Renewable capacity forecasted for Toronto Hydro is allocated to the different rate classes. The Integration Model uses the 2022 participation percentages in Toronto Hydro's net metering program by rate class to estimate the rate class allocations."

a) Please provide a publicly accessible response to the specific questions posed in VECC 48 f). If considered confidential, please explain why.

b) With respect to the reference from Exhibit 3, what was the basis for the "participation percentages" used (e.g., were they based on number of customers, total energy produced, net energy delivered to THES, or some other metric).

c) Please clarify whether the forecasted Renewable (and the forecasted Non-Renewable capacity) includes or excludes generation capacity directly connected to (and selling to) the THES system (e.g., microFIT facilities).

VECC TCQ-4 (Non-Renewable Impacts)

REFERENCE: IRR 3-VECC 50 a) & b)
Exhibit 3, Tab 1, Schedule 1, Appendix J, pages 28-29

PREAMBLE: Appendix J states:
"*Toronto Hydro provided the behind-the-meter Non-Renewable nameplate capacity forecast and historical data to Clearspring. It is Clearspring's understanding that these Non-Renewable DERs will be actively dispatched by the IESO*."
And
"*Toronto Hydro provided the capacity factors by hour for the existing Non-Renewable generation on its system that are dispatched by the IESO*."

VECC 50 a) states:
"*Toronto Hydro does not collect detailed information about the number of DERs that are currently Market Participants (i.e., dispatched by the IESO)*."

a) Please reconcile the response to VECC 50 a) with the statement in Appendix J that "Toronto Hydro provided the capacity factors by hour for the existing Non-Renewable generation on its system that are dispatched by the IESO", as the statement suggests that THES does know which non-renewable DERs are dispatched by the IESO.

b) If not provided by Toronto Hydro (as suggested by VECC 50 a)), what is the basis for Clearspring's understanding that Non-Renewable DERs will be actively dispatched by the IESO?

c) The Non-Renewable Production profile provided in Appendix J (page 29) indicates that production is virtually constant across all hours of the day suggesting that: i) customer owned Non-Renewable capacity is not used dispatched by the IESO to manage system peaks and ii) customer owned Non-Renewable capacity is not used by customers to manage their own billing demands either overall or in terms of their coincidence with system peaks. Please confirm that this matches THES' understanding of how customer-owned Non-Renewable generation capacity is operated.

PANEL #2

VECC TCQ-5 (Allocation of Key Accounts Costs)

REFERENCE: IRR 4-STAFF 295 e) & f)

a) Does the response to STAFF 295 e) represent the allocation of 2025 Key Accounts costs to customer classes per the cost allocation model? If not, what to the results represent?

b) Please explain why, in STAFF 295 e), the Key Accounts costs allocated to the GS 50-999, GS 1,000-4,999, Large Use, Street Light and USL classes are all negative.

c) Does THES believe it would be appropriate to directly assign Key Account costs to customer classes?

PANEL #3

EXHIBIT 7

VECC TCQ-6 (Billing and Collections Weighting Factors)

REFERENCE: IRR 7-STAFF-325

a) The question asked for the derivation of the Billing and Collections weighting factors. Please provide a schedule (Excel Worksheet) that sets out the actual derivation by setting out the various metrics (i.e., cost categories) used, the total costs associated with each, the allocation factor used for each, the resulting allocation of each metric's costs to customer classes and the determination the resulting weighting factors.

VECC TCQ-7 (Customer Class Load Profiles)

REFERENCE: IRR 7-STAFF-326 a) – c)

a) How was the sample size for each of the Residential, CSMUR and GS<50 customer classes determined? In particular, were they chosen so as to provide a certain level of confidence as to the accuracy of the results?

b) For the GS 50-999, GS 1,000-4,999 and Large Use classes, please confirm that the percentages reported represent the percentage of customers for whom there were "full data sets" and what is meant by a customer having a "full data set". If not confirmed, what do the percentages represent?

VECC TCQ-8 (Services Weighting Factors)

REFERENCE: IRR 7-VECC 79 e)
IRR 7-VECC 90 a), Appendix A, Tab I6.2

a) The response to VECC 79 e) indicates the number of buildings in the CSMUR class is 472. However, the cost allocation model provided in response to VECC 90 a) indicates that the number of CSMUR buildings is 383. Please reconcile and update the calculation of the CSMUR Services weighting factor as required.

VECC TCQ-9 (Meter Capital and Meter Reading)

REFERENCE: IRR 7-VECC 82
Exhibit 7, Tab 1, Schedule 3, Cost Allocation Model,
(Tabs I7.1 & I7.2

a) In THES' Cost Allocation Model, for the GS<50, GS 50-999, GS 1,000-4,999 and Large Use classes, the number of meters used for purposes of allocating meter capital costs (Tab I7.1) and meter reading costs (Tab I7.2) is set equal to the number of customers. However, VECC 82 indicates that for these classes the number of meters owned and read by THES exceeds the number of customers in each class. Please confirm that the number of meters and meter reads used for these classes in Tabs I7.1 and I7.2 should be increased accordingly. If not, why not.

VECC TCQ-10 (Customer Class Load Profiles)

REFERENCE: IRR 7-VECC 86 c) – j)
Exhibit 7, Tab 1, Schedule 2

a) With respect to Schedule 2, please confirm that columns (a) and (b) represent the best information THES has as to the customer class' relative use of electricity in each hour (i.e., its load profile)?

b) Is it fair to say that the purpose of the calculations performed in Schedule 2, columns (c) through (g) is to, using these results, determine the load profile for the class' actual 2019 load which is then weather normalized in column (h)?

c) Is it fair to say that if one were to calculate the total of the values in column (c) for each rate class as a percentage of actual kWh use by each rate class the percentage would likely vary by rate class?

   i. If not, why not?

   ii. If yes, doesn't this impact the results in column (g) – i.e., for those classes were column c) represents a higher percentage of the class' actual load column (g) will overstate that class' percentage of total system load?

d) With respect to VECC 86 (i), in principle, if the sample provides the best estimate as to the relative hourly loads for the customer class then shouldn't the hour identified using the sample as having the highest load be the same as the hour where the highest load occurs for the estimated actual hourly load profile?

   i. If not, why not?

e) VECC 86 (e) asked "why wouldn't it be more appropriate to determine the hourly profile for the class by multiplying the hourly profile for the sample by the ratio of class's total energy to the energy use accounted for by the sample". The response outlines the approach THES used but does respond to the question posed. If the sample provides the best estimate of the customer class' relative hourly loads, please explain why the simpler approach proposed in VECC 86 (e) would not be appropriate.

VECC TCQ-11 (CSMUR Cost Allocation Treatment)

REFERENCE: IRR 7-VECC 79 e)
IRR 7-VECC 90, Appendices A & C, Tabs I5.2 & I6.2
Exhibit 7, Tab 1, Schedule 3, Cost Allocation Model, Tabs I5.2 & I6.2

a) The Application's Cost Allocation model uses number of units as the basis for the customer count for the CSMUR class and a Services weighting factor of 0.0047956353439605. In VECC 90, Appendices A & C the number of buildings is used as the basis for the customer count for the CSMUR class. However, a weighting factor of 0.0047956353439605 is still used for the allocation of Services costs to CSMUR. Shouldn't the Services weighting factor in Appendices A & C be revised (and set equal to 1.0)?

EXHIBIT 8

VECC TCQ-12 (Standby Rates)

REFERENCE: IRR 8-CCMBC 21
OEB March 28, 2024 Letter re: Consultation on Policy for Standby Rates
Exhibit 8, pdf page 8

PREAMBLE: Exhibit 8 (pdf page 8) states:
"*Toronto Hydro is not proposing final standby rates in this application*."

The OEB's March 28th Letter states:
"*Electricity distributors with interim standby rates should inform their standby customers of the intention to apply to make the existing interim standby rates final, and then apply for this at the time of the next rate application. Distributors may choose to seek finalization of interim stand by rates in either rebasing or incentive rate-setting mechanism (IRM) applications as long as there is evidence of notice provided to customers for which any standby rate applies*."

The response to CCMBC 21 describes the application of the Standby Power Service Classification's variable Distribution Volumetric Rate as follows:
"*The Distribution Volumetric Rate normally applies to the amount of backup distribution capacity a customer contracts for and the variable rate (per kVA) is the same as is applicable to the customer's demand under the standard distribution rates. However, to the extent that the backup capacity is actually drawn upon by the customer, as reflected in the customer's peak metered demand for the billing period, the Distribution Volumetric Rate is correspondingly reduced*."

a) Given the OEB's Letter of March 28th, is it still THES' proposal not to seek finalization of its Standby rate as part of this Application?

b) If not seeking finalization as part of this Application, when would THES anticipate doing so?

c) With respect to the response to CCMBC 21, please explain how THES determines that backup capacity has actually been drawn upon by the customer.

d) In such events is it the Distribution Volumetric Rate that is reduced or is it the billing demand (i.e., kVA) to which the standard distribution rates are applied that is reduced. Please also explain how the amount of the reduction is determined.

e) Are customers with their own generation required to contract for Standby Power Service?

    i. If not, would a customer with its own generation that contracts for Standby Power have a higher or lower bill than one who does not (all other things being equal) when: i) the backup capacity provided by the LDC (i.e., Standby Power) is not used in a given month and ii) backup capacity provided by the LDC (i.e., Standby Power) is used in a given month?

VECC TCQ-13 (Rate Design Post-2025)

REFERENCE: IRR 7-VECC 78 a) & b)
IRR 8-STAFF 334
IRR 8-ED 45 d)
Exhibit 6, Tab 1, Schedule 2 (2025 RRWF), Tab 11 (Cost Allocation)

PREAMBLE: STAFF 334 sets out the forecast fixed and variable distribution revenue by customer class for 2025-2029.

ED 45 d) states:
"*Toronto Hydro proposes in Exhibit 1B, Tab 1, Schedule 3, section 7 that for the years 2026 to 2029, the final approved base revenue requirements be allocated to each rate class based on the same allocations to rate classes established in this proceeding for 2025. …..Toronto Hydro will hold constant the fixed/variable revenue split for each rate class determined in 2025 for the purpose of designing rates from 2026 to 2029*."
(emphasis added)

VECC 78 a) states:
"*The revenue requirement for 2025 will be escalated using the Custom Revenue Cap Index (CRCI) to come up with*

revenue requirement for 2026. Subsequently, the base revenue requirement for 2026 will be distributed across various rate classes and divided into fixed and variable split, both based on the 2025 data. In the final stage of rate design, the fixed and variable revenue for each rate class will be divided by the forecasted 2026 billing determinants to determine the distribution rates."

VECC 78 b) states:
"*Yes, the distribution rates increase will vary across the classes, depending on the annual projected growth in billing determinant for each rate class*."

a) With respect to ED 45 d), does THES propose to use the percentage allocations to rate classes as shown in the 2025 RRWF, Tab 11 (Cost Allocation), Table A to establish the service revenue requirement by rate class for 2026 to 2029?

   i. If yes, how does THES propose to allocate the forecast Miscellaneous Revenues to rate classes for each of the years 2026-2029 in order to determine the base revenue requirement by rate class for each of these years?

   ii. If not, how does THES propose to determine the base revenue requirement by customer class for each of the years 2026-2029?

b) It is noted that THES has not applied its Cost Allocation Model to the forecast revenue requirements for 2026-2029. However, if cost allocations were undertaken for these years please confirm that for the results to produce overall percentage allocations to customer classes similar to those in 2025, the proportion of costs allocated to the various USOAs and the allocation factors (%) for each customer class would have to be similar to those for 2025.

c) With respect to VECC 78 b) please confirm that it will be those customer classes whose billing determinants are growing at a slower rate than average that will experience the higher distribution rate increases.

d) Would it be reasonable to assume that for those customer classes where the billing determinants for 2026-2029 are growing at a slower rate, their allocation factors (as used in the cost allocation model) would also be growing at a slower rate?

VECC TCQ-14 (Rate Smoothing)

REFERENCE: IRR 8-STAFF 335
IRR 8-SEC 123 b)

PREAMBLE: The response to STAFF 335 describes THES' rate smoothing proposal as follows:
"*Toronto Hydro's proposal for rate smoothing does not defer cost recovery; it carefully times the disposition of DVA balances in order to smooth the overall change in the distribution portion of the customer bill. In accordance with OEB rules for DVAs, the balances of those accounts accumulate interest – a credit or debit as applicable – so long as they carry a balance*."

SEC 123 b) shows the annual customer bill impacts before the rate smoothing proposal.

a) What were the assumed recovery periods for the various DVA balances for purposes of SEC 123 b)?

EXHIBIT 3

VECC TCQ-15 (Residential and GS<50 Customer Counts)

REFERENCE: IRR 3-VECC 22 d) & VECC 23 d)
IRR 3-VECC 23 e), Appendix A

PREAMBLE: VECC 22 d) states:
"*Toronto Hydro sources its population data from the Conference Board of Canada, and extends the forecast using simple linear trend when the forecast does not cover the full rate application period*."

VECC 23 d) states:
"*Toronto Hydro sources its employment data from the Conference Board of Canada, and extends the forecast using simple linear trend when the forecast does not cover the full rate application period*."

a) With respect to the 2022-2029 population data provided in VECC 23 e), Appendix A (Variables Tab, Column L) please indicate which values are based on: i) actual population, ii) the CBOC forecast values and iii) a simple linear trend.

   i. For those population values based on a simple linear trend, what was the basis for the trend (e.g. what years' values were used to establish the trend)?

b) With respect to the 2022-2029 employment data provided in VECC 23 e), Appendix A (Variables Tab, Column M) please indicate which values are based on: i) actual employment, ii) the CBOC forecast values and iii) a simple linear trend.

i. For those employment values based on a simple linear trend, what was the basis for the trend (e.g. what years' values were used to establish the trend)?

VECC TCQ-16 (Historical/Forecast GS Customer Counts)

REFERENCE: IRR 3-STAFF 278 b)
Exhibit 3, Tab 1, Schedule 1, Appendix H

a) With respect to Staff 278 b), for each of the years 2020 to 2022 the reduction in the GS 50-999 customer count due to reclassification exceeds the increase in the GS<50 customer count due to reclassification. For each of these years what accounts for the difference?

b) In Appendix H, for the forecast years 2023-2029 why was the RECLASS3 dummy variable assigned a value of 1.0?

c) For the forecast years 2023-2029 were any specific adjustments made to the forecast customer counts for the other customer classes (i.e., other the GS<50 and GS 50-999) to account for the fact that the RECLASS3 dummy variable decreases the monthly customer count for the GS 50-999 class by 373.04 but only increases the GS<50 monthly customer count by 122.44 (per Exhibit 3, Tab 1, Schedule 1)? It not, why not?

VECC TCQ-17 (Forecast Customer Counts)

REFERENCE: IRR 3-STAFF 276 b)
IRR 3-SEC 79 b)
IRR 3-VECC 25 b)

PREAMBLE: STAFF 276 b) states:
"*Customer reclassification contributes to the decreasing trends in the GS 1,000-4,999 kW and Large Use rate classes*."

SEC 79 b) states:
"*The GS 1000-4999 kW and Large Use class customer count forecasts were developed with a combination of 1) customer counts from new connections during this period, and 2) forecasted changes in customer counts due to reclassification*."

VECC 25 b) states:
"*The GS 1,000-4,999 customer count forecast declines between 2023 and 2025 due to forecasted impacts from reclassification. The forecasted reclassification was based on a 10-year average reclass (prior to the COVID-19 pandemic*)."

a) With respect to Staff 276 b) and SEC 79 b), for each of the GS 1,000-4,999 and Large Use classes, please provide a schedule that breaks down the annual increase in customer count forecast for each of the years after 2022

up to 2029 as between: 1) customer counts from new connections during this period, and 2) forecasted changes in customer counts due to reclassification.

b) Between the results of the regression equations used for the GS<50 and GS 50-999 classes customers counts and the assumptions underlying the forecast customer counts for GS 1,000-4,999 and Large Use, do the impacts of customer reclassification across all classes net out to zero for each of the years 2023-2029?

   i. If yes, please provide a schedule setting out impact of customer reclassification for each of these customer classes demonstrating that the net impact is zero.

   ii. If not, do any adjustments need to be made to the forecast customer counts?

VECC TCQ-18 (Street Lighting Customer Count)

REFERENCE: IRR 3-STAFF 277 b)
IRR 3-STAFF 284 a)

PREAMBLE: STAFF 277 b) states:
"*The City of Toronto is the sole customer in the Street Lighting rate class for both historic and forecast years. Toronto Hydro does not own street lighting on Ministry of Transportation expressways (e.g. Hwy 401*)."

STAFF 284 a) states:
"*Since the completion of the transactions in EB-2009-0180/1/2/3, Toronto Hydro has owned certain street lighting assets in the city of Toronto that were deemed by the OEB to serve a distribution purpose and Toronto Hydro Energy has owned other street lighting and expressway lighting assets that were deemed not to serve a distribution purpose.*"

a) Please clarify whether it is the City of Toronto, Toronto Hydro Energy or some other party that owns street lighting on expressways and pays for the electricity distribution service provided by THES.

b) If not the City of Toronto then why is the City of Toronto the sole street lighting customer and what customer class is street lighting on expressways considered to be in?

VECC TCQ-19 (Forecast EVs))

REFERENCE: IRR 3-VECC 41 a)
IRR 3-VECC 42 a) & b)

PREAMBLE: VECC 41 a) states:
"*Toronto Hydro utilized data from the Ontario Ministry of Transportation to obtain the number of LDEVs in Toronto for 2018 to 2021. Toronto's share of Ontario's new vehicles is assumed to be constant over time at 12.7%. The forecast of new vehicle registration and total vehicles registered each year was built up to achieve 20% of the total LDV fleet in 2030, a target provided by City of Toronto's Electric Vehicles Strategy*."

VECC 42 b) states:
"*The resulting MD and HD vehicles in Toronto were used, in conjunction with the EV adoption rates described in 3-VECC-42, a) to develop the MDEV and HDEV vehicle forecasts. Please to refer to Appendix A for supporting calculations*."

a) Does the City of Toronto have any specific policies or programs designed to achieve its 20% EVLD target by 2030?

VECC TCQ-20 (Historic CDM Impacts)

REFERENCE: IRR 3-VECC 31 c) & d)
Exhibit 3, Tab 1, Schedule 1, Appendix C

PREAMBLE: VECC 31 c) states:
"*Toronto Hydro used a 5-year average monthly distribution of consumption to account for the fact that in the first year the CDM savings realized will be less than the annualized value. Please refer to Exhibit 3, Tab 1, Schedule 1, Appendix C for the full calculations*."

a) A review of Appendix C indicates that application of the monthly distribution percentages results in the full annualized savings being allocated to all months even in the first year the CDM savings are realized. Does THES agree?

i. If not, please indicate precisely where and how Appendix C accounts for the fact that the first year CDM savings will be less than the annualized value.

ii. If yes, please revise the values (both historic and forecast) for the CDM variables used to reflect this fact, re-estimate the regression models and provide a revised forecast by customer class for 2023-2029, as originally requested in VECC 31 d).

VECC TCQ-21 (Local 2022-2024 CDM Initiatives)

REFERENCE: IRR 3-VECC 35 a) - c)

PREAMBLE: The responses indicate that THES has not undertaken nor is it planning on undertaking any Local (CDM) Initiatives in the 2022-2024 period.

The response to VECC 35 a) states:
"*However, the IESO's local initiatives program was developed to deliver CDM savings in targeted areas of the province. Part of Toronto was identified as one of the first four targeted areas*."

a) The IESO web-site indicates that the Toronto-area local initiative is being delivered in collaboration with Toronto Hydro (https://saveonenergy.ca/For-Business-and-Industry/Programs-and-incentives/Local-Initiatives/BizEnergySaver). Please provide any information that THES has regarding the current status of the Toronto-area local initiative including the period the program will be in effect, the savings to date, and the planned overall annualized savings.

VECC TCQ-22 (Other Revenue Forecast)

REFERENCE: IRR 3-VECC 54
IRR 8-VECC 94 a)

PREAMBLE: VECC 94 a) states:
"*Toronto Hydro proposes to update Other Revenue on an annual basis using the CRCI formula*."

With respect to microFIT revenues, VECC 54 states:
"*Toronto Hydro has forecasted 2025 revenues using trending from 2021-2023 and escalated it by inflation for the 2026-2029 period*."

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a) With respect to VECC 54, when the response states that for 2026-2029 the microFIT revenues will be escalated by inflation does THES mean the CRCI formula? If not, please reconcile this response with the response to VECC 94 a).