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December 19, 2024

Registrar
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Re: Distribution Sector Resilience and Responsiveness Report (EB-2021-0307) – Toronto Hydro-Electric System Limited Comments

Toronto Hydro-Electric System Limited (“Toronto Hydro”) is the local electricity distribution company for the City of Toronto. It serves over 790,000 customers and delivers about 18% of the electricity used in Ontario.

On December 4, 2024, the OEB released a report regarding “Distribution Sector Resilience and Responsiveness”, prepared by ICF Consulting Canada Inc., (“ICF”) which incorporates results from utility surveys undertaken earlier in the year, and responds to a request detailed in the Minister of Energy’s November 2023 Letter of Direction to the OEB. The report is intended to provide insight into and an assessment of Ontario distributors’ approach to planning for and recovery from major storms.

Toronto Hydro writes to the OEB with concern over ICF’s report methodology, specifically its categorization of utilities into only three sizes, and most peculiarly the grouping of “Large” distributors as those with more than 30,000 customers. The report categorizes utilities with up to 5,000 customers as “Very Small”, from 5,000 to 30,000 as “Small”, and over 30,000 as “Large”. Toronto Hydro questions the probative value of grouping utilities on the lower end of the supposed “Large” spectrum with those on the higher end. In the context of policy related to grid design, investment, and operations, the realities and experiences of a utility serving a cluster of towns (as an example) is vastly different from those of larger utilities serving 100,000 or more customers. There would be much greater value in understanding the relative states of resiliency of the utilities that are genuinely among the larger ones in Ontario.

Toronto Hydro requests that the OEB and ICF revise its report to provide a more granular breakdown of results by separating the current “Large” category into new “Medium” (30,000 to 100,000) and “Large” (100,000+) categories. Based on an analysis of the OEB’s yearbook data, this would split the current “Large” grouping of 22 utilities into two subgroups of 14 and 8: sufficient sizes for survey anonymity, but more useful for analytical purposes. In the alternative, an addendum to the report with such a breakdown would also be beneficial. The eight utilities in the revised “Large” category account for 79% of all customers in the province, and 83% of Ontario’s load, so the resiliency readiness of this grouping is fundamental to a determination of the state of resiliency in the province as a whole. Including the survey results of medium-size utilities within this grouping on an equally weighted basis very likely distorts the survey findings, and may lead to an inaccurate perception of resiliency of the provincial energy system, the scale and scope of potential gaps in best practices, and the appropriateness of ICF’s recommendations.

Sincerely,

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

Andrew J. Sasso
Director, Regulatory Affairs & Government Relations
Toronto Hydro-Electric System Limited

AJS/jl