

Andrew J. Sasso
Director, Regulatory Affairs & Government Relations
Toronto Hydro-Electric System Limited
14 Carlton Street; Toronto, ON M5B 1K5
regulatoryaffairs@torontohydro.com



January 23, 2025

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

**Re: Vulnerability Assessment and System Hardening; Draft Vulnerability Assessment Report
(EB-2024-0199) – Comments of Toronto Hydro-Electric System Limited**

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 17, 2024, as part of its Vulnerability Assessment and System Hardening (“VASH”) initiative, the OEB issued a draft version of its Vulnerability Assessment Report (“VA Report”) along with a toolkit which includes resources designed to assist distributors in their preparation of vulnerability assessments and analyses. The draft VA Report is reflective of and incorporates stakeholder feedback provided at earlier VASH stakeholder meetings.

Toronto Hydro is supportive of the VA Report and its recommendations, and commends the OEB for incorporating and addressing a considerable number of key issues and concerns raised by stakeholders. In particular, Toronto Hydro is pleased to see the OEB recognize that many utilities are already undertaking vulnerability assessments, with the VA Report reflecting this by recommending the establishment of both a “Generic” and “Custom” approach. The latter option would allow utilities to undertake vulnerability assessments with greater flexibility, leverage experience with past assessments, and allow for the use of more customized methodologies. Recommending both a Custom and Generic option in establishing the vulnerability assessment requirements accounts for the many differences among utilities in the province, and recognizes that a “one size fits all” approach is rarely an optimal solution. Toronto Hydro suggests that the OEB’s successful approach in developing this framework, which faithfully reflected stakeholder feedback and leaned on principles of flexibility, efficiency, and

ultimately practicality, should be relied on as a model in formulating future solutions to regulatory issues being considered in this and other OEB proceedings.

Respectfully,

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 distinguishable.

Andrew J. Sasso

Director, Regulatory Affairs & Government Relations
Toronto Hydro-Electric System Limited

AJS/jl