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

**Re: Electric Vehicle Integration (EVI) Initiative (EB-2023-0071) - Electricity Delivery Rates for Electric Vehicle (EV) Charging: Comments of Toronto Hydro-Electric System Limited**

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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 January 7, 2025, the OEB issued a revised Electric Vehicle Charging Rate Overview Draft Report ("Report"), which details a proposal for an Electric Vehicle Charging Rate ("EVC Rate"). The OEB's proposed EVC Rate responds to direction from the Minister of Energy to consider rate design options that would promote the expansion of Electric Vehicle ("EV") charging stations, and builds on an initial EVC Rate proposal issued in May 2024. Toronto Hydro supports the efficient integration of EVs in Ontario and recognizes that the EVC Rate, through its reduction to Retail Transmission Service Rates, will contribute to this objective. Toronto Hydro has taken the opportunity to review the Report and EVC Rate parameters, and in the interest of clarification and implementation efficiency, offers comments primarily relating to eligibility requirements, reporting, and implementation timeline matters.

**Eligibility and Enrollment**

One of the factors required to determine customers' eligibility for the EVC Rate is based on the annual load factor of a charging station, wherein a customer's account must have an annual load factor equal to or less than 20%. Although the Report details the formula to compute the annual load factor for already enrolled customers, it would be beneficial to clarify the transitional approach during the first year when no historical load data is available. Toronto Hydro understands that the intention is for customers to self-declare their expectation of meeting the load factor and other eligibility requirements for the EVC rate when first enrolling via an opt-in form, with subsequent re-declarations only attesting to the criteria that are beyond the visibility of utilities (e.g. that chargers do not serve fleets, etc.). If this is the case, Toronto Hydro suggests that it would be worthwhile to consider a more streamlined process for

renewing eligibility (vs. initial enrollment), otherwise customers could be submitting forms attesting to certain eligibility criteria (e.g. load factor expectations) that utilities are already reviewing by virtue of requirements to monitor for ongoing eligibility. To the extent possible, Toronto Hydro suggests the OEB consider minimizing the requirements relating to the scope and frequency of new opt-in forms from customer wishing to remain on the EVC rate after one year. Processing the forms is an administrative task and an additional obligation for customers, and with enrolled customers already having the option to opt-out at any time and utilities having the responsibility for annually reviewing (most) ongoing eligibility criteria, processing opt-in forms from customers wanting to maintain their EVC rate on an annual basis may provide limited value.

**Reporting:**

Toronto Hydro is concerned with the specificity proposed in the new additional Reporting and Record-keeping Requirements. Specifically, Toronto Hydro submits that the OEB's request for utilities to "record information on the hourly kW demand of each of its participating EVC Rate customers by facility or metered service" is exceedingly detailed and does not appear to provide value for the effort that will be required to collect, validate, and extract this data. Toronto Hydro appreciates that a template to record this information would be developed in collaboration with the OEB, but absent a specific need for "hourly" data, would suggest that this information be provided on a "daily kW" basis instead.

**Implementation:**

The Report recommends that the EVC Rate be made available to customers in 2026, once utilities' OEB-approved 2026 distribution rates become effective. Toronto Hydro has no concerns with this proposed effective date, but notes that in order to efficiently achieve this timeline sufficient lead time is required to incorporate the EVC rate within utility distribution rate applications for 2026 before they are filed. In Toronto Hydro's case, its distribution rate application is typically filed in August 2025, which would require the EVC parameters to be finalized by April-May in order to be seamlessly incorporated within its rate application.

Toronto Hydro also requests that the OEB streamline communication by sharing key materials (messaging, information material, etc.) with utilities to ensure consistency in outreach and promote maximum participation and enrolment of customers. This approach has been used in the recent rollouts of other customer facing programs, such as the ULO TOU Rate, and Toronto Hydro expects that a similar coordinated approach to the EVC rate would be equally effective.

Toronto Hydro appreciates the opportunity to provide comments on this issue, and looks forward to finalizing the implementation of the EVC rate for its customers as a step towards further advancing the build-out of EV charging infrastructure.

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 legible.

**Andrew J. Sasso**

Director, Regulatory Affairs & Government Relations  
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