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

Re: Vulnerability Assessment and System Hardening; Draft Vulnerability Assessment and System Hardening 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 July 31, 2025, as part of its Vulnerability Assessment and System Hardening (“VASH”) initiative, the OEB issued a draft version of the complete VASH Report for stakeholder comment. The complete draft VASH Report builds on the earlier draft Vulnerability Assessment Report issued on December 17, 2024 and now includes the vulnerability assessment, value of lost load, and benefit-cost analysis methodologies. The VASH Report is reflective of and incorporates stakeholder feedback provided through ongoing VASH stakeholder meetings.

As with its earlier submission on the Vulnerability Assessment Report¹, Toronto Hydro continues to be broadly supportive of the recommendations contained within the complete draft VASH Report. Toronto Hydro commends the OEB for continuing to be responsive to and addressing a number of key issues and concerns raised by stakeholders. In particular, Toronto Hydro reiterates the importance of recognizing that many utilities are already undertaking vulnerability assessments, and appreciates that the draft VASH Report continues to recommend the establishment of both a “Generic” and “Custom” approach to undertaking such assessments. Toronto Hydro is also appreciative of the incorporation of flexibility within the framework and the use of industry accepted data and models as foundational elements of its

¹ Vulnerability Assessment and System Hardening; Draft Vulnerability Assessment Report (EB-2024-0199) – Comments of Toronto Hydro-Electric System Limited, January 25, 2025

Vulnerability Assessment Toolkit. The comprehensive flexibility built into the VASH framework will allow it to be applied effectively to the diverse range of distributors across the province.

Toronto Hydro appreciates the opportunity to continue to work with the OEB and stakeholders on reviewing and standardizing the policy approach to vulnerability and system hardening across the sector, and looks forward to the release of the OEB's finalized VASH Report.

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
Toronto Hydro-Electric System Limited

AJS/jl