

August 9, 2012

BY COURIER (2 COPIES) AND EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
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Toronto, Ontario M4P 1E4
Fax: (416) 440-7656
Email: boardsec@oeb.gov.on.ca

Dear Ms. Walli:

**Re: Pollution Probe – Submissions on Draft Issues List
EB-2012-0064 – Toronto Hydro 2012-2015 Rates**

I am writing on behalf of Pollution Probe to provide submissions on the draft issues list for this matter.

Pollution Probe requests that the following two issues be added to the issues list, or that the Board confirm that the following two issues are already covered by issue 2, relating to the incremental capital module:

1. Is THESL pursuing all the feasible and reliable conservation and demand management (“CDM”) options that can meet its customers’ electricity needs at a lower cost than its proposed supply-side capital expenditures?
2. Is THESL’s proposed level of spending to facilitate distributed generation (“DG”) such as combined heat and power (“CHP”) appropriate?

These two issues are key to minimizing overall customer bills, improving Toronto’s security of supply, and furthering government policies and environmental targets.

These issues are important because investment in reliable CDM and DG could result in significantly lower customer bills. Very simply, CDM and DG investments can be a less expensive way of meeting customer needs as compared to more costly supply-side investments into distribution and transmission capacity. This is particularly the case with CDM programs, which can be very cost effective. These issues should be examined to ensure that customer bills are minimized.

CHP would also contribute to Toronto's security of supply by providing a reliable local source.

Finally, CDM and DG would contribute to reductions in greenhouse gas emissions ('GHG'), further government energy policy, and assist the province in meeting GHG reduction targets.

For those reasons, Pollution Probe requests that the above two issues be added to the issues list, or that the Board confirm that they are already covered by issue 2, relating to the incremental capital module.

Yours truly,

A handwritten signature in blue ink, appearing to be 'K. Elson', written in a cursive style.

Kent Elson