



PUBLIC INTEREST ADVOCACY CENTRE
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October 31, 2013

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: EB-2012-0064 -Toronto Hydro Electric Systems Limited (THESL)
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find attached the interrogatories of VECC in the above-noted proceeding.

In accordance with Procedural Order No. 7, VECC also wishes to inform the Board that it does not intend to file evidence in Phase 2 of this proceeding.

Yours truly,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written over a horizontal line.

Michael Janigan
Counsel for VECC

cc: THESL - Amanda Klein - regulatoryaffairs@torontohydro.com

REQUESTOR NAME	VECC
INFORMATION REQUEST ROUND NO:	# 3
TO:	Toronto Hydro-Electric System Limited (THESL)
DATE:	October 31, 2013
CASE NO:	EB-2012-0064
APPLICATION NAME	2014 ICM Phase 2

3. Is THESL's application of the ICM criteria appropriate?

3 – VECC-1.0

Reference: Exhibit Tab 9, Schedule 9, pg. 11/ Schedule A1

Exhibit Tab 4, Schedule A, Appendix 1 (Updated Oct 31, 2012)

- a) In May 2012 THESL provided a comprehensive proposed schedule of ICM project costs for each of 2012 through 2014. For each 2014 project for which the cost estimate has increased by 10% or more please provide the **new** information acquired between May 2012 and the filing of the Phase 2 application which resulted in an update to the project costs. In fulfilling this interrogatory please describe how and when the new information was acquired and how the new information meets the ICM criteria.

[For example, since the original filing THESL identified 19 new jobs for underground infrastructure (T9/SB). How were these projects identified and why were they not known in May 2012?]

5. Are THESL's proposed 2014 ICM Rate Riders, comprised of approved 2012 and 2013 expenditures and proposed 2014 expenditures, appropriate

5 - VECC- 2.0

Reference: Exhibit Tab 9, Schedule 9, pg. 11/ Schedule A1

Exhibit Tab 4, Schedule A, Appendix 1 (Updated Oct 31, 2012)

- b) Please update Appendix 1 (Tab 4, Oct 31) to show in the Summary of Capital Program:
 - a. Actual 2012 spending
 - b. 2013 revised forecast (if any)
 - c. 2014 spending
 - d. Total 3 year ICM project spending /costs.

5 -VECC – 3.0

Reference: Exhibit Tab 9, Schedule 1, pg.14

- a) Please provide a table showing the 2012 ICM project amount (see above) that was in-service in 2013 and (separately) 2013 ICM projects currently in service or forecast to be in-service by the end of 2013.
- b) Please show all 2012 projects costs projected to be in-service in 2013 and (separately) in-service in 2014.

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