

Daliana Coban
Director, Regulatory Applications & Business Support
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14 Carlton Street | Toronto, Ontario, M5B 1K5
Visit us at: www.torontohydro.com
Email: regulatoryaffairs@torontohydro.com



via Regulatory Electronic Submission System (RESS)

April 22, 2024

Ms. Nancy Marconi, Registrar
Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: OEB File No. EB-2023-0195, Toronto Hydro-Electric System Limited (“Toronto Hydro”)
2025-2029 Custom Rate Application for Electricity Distribution Rates and Charges –
Technical Conference Undertaking Responses and Evidence Update**

Please find enclosed a consolidated copy of Toronto Hydro’s response to 200 undertakings from the Technical Conference on April 8-12, 2024, including the responses previously filed on April 18, 2024. Toronto Hydro is seeking confidential treatment of certain information being produced as part of these undertaking responses under a separate letter.

In addition, as the utility committed on Day 4 of the Technical Conference (Transcript Day 4 at page 141, lines 8-21) Toronto Hydro is filing updated bill impacts, completed revenue requirement work forms and the cost allocation model to align with the financial updates which were filed on April 2, 2024. Please refer to Appendix A to this letter for a summary of the updated evidence. Along with the updated models noted above, for ease of reference Toronto Hydro is filing a consolidated copy of Exhibit 1B which includes an updated Application Summary (Exhibit 1B, Tab 1, Schedule 3).

Please contact us if you have any questions.

Sincerely,

**Daliana
Coban** Digitally signed by Daliana Coban
DN: cn=Daliana Coban, c=CA,
email=dcoban@torontohydro.com
Date: 2024.04.22 17:52:10 -04'00'

Daliana Coban

Cc: Charles Keizer and Arlen Sternberg, Torys LLP; all intervenors

Appendix A: Summary of Updated Evidence (April 22, 2024)

Pre-Filed Evidence	Description of the Revisions	Numerical Differences																																																																																																													
<p>Application Summary (Exhibit 1B, Tab 1, Schedule 3)</p>	<p>Updated the Bill Impacts to reflect the impact of the updated 2024-2029 Revenue Requirement as outlined in the April 2, 2024 evidence update.</p>	<p>Table 1: 2025-2029 Total Bill Impacts – Proposed Change in Monthly Bill</p>																																																																																																													
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	Updated Table 15 Proposed Allocators for Rate Class with updated Cost Allocation Model (see below).	<p>Table 15: Proposed Allocators for Rate Classes</p> <table border="1"> <thead> <tr> <th>Allocators</th> <th>Total (%)</th> <th>Resi (%)</th> <th>CSMUR (%)</th> <th>GS < 50kW (%)</th> <th>GS – 50-999 kW (%)</th> <th>GS > 1,000 to 4,999 kW (%)</th> <th>Large User =>5,000 kW (%)</th> <th>Street Lighting (%)</th> <th>USL (Connection) (%)</th> <th>USL (Cust.) (%)</th> </tr> </thead> <tbody> <tr> <td>Distribution Revenue (2022)</td> <td>100.0</td> <td>38.9</td> <td>4.8</td> <td>15.5</td> <td>26.1</td> <td>8.3</td> <td>3.9</td> <td>2.0</td> <td>0.5</td> <td>0.0</td> </tr> <tr> <td>Revenue Offsets (2025)</td> <td>100.0</td> <td>35.6 35.9</td> <td>4.3 4.4</td> <td>14.6 15.0</td> <td>17.4</td> <td>4.8</td> <td>1.8</td> <td>21.1 20.5</td> <td>0.3</td> <td>0.0</td> </tr> <tr> <td>LRAMVA</td> <td>100.0</td> <td>-0.5 -0.9</td> <td>0.0 -0.1</td> <td>-21.9 -23.9</td> <td>59.0 60.4</td> <td>12.9 15.6</td> <td>50.6 48.9</td> <td>0.0</td> <td>0.0</td> <td>0.0</td> </tr> <tr> <td>Distribution Revenue GS>50 kW (2022)</td> <td>100.0</td> <td>0.0</td> <td>0.0</td> <td>0.0</td> <td>64.0</td> <td>20.3</td> <td>9.6</td> <td>5.0</td> <td>1.1</td> <td>0.0</td> </tr> <tr> <td># of RPP Customers (2022)</td> <td>100.0</td> <td>78.8</td> <td>11.9</td> <td>8.8</td> <td>0.4</td> <td>0.0</td> <td>0.0</td> <td>0.0</td> <td>0.1</td> <td>0.0</td> </tr> </tbody> </table>	Allocators	Total (%)	Resi (%)	CSMUR (%)	GS < 50kW (%)	GS – 50-999 kW (%)	GS > 1,000 to 4,999 kW (%)	Large User =>5,000 kW (%)	Street Lighting (%)	USL (Connection) (%)	USL (Cust.) (%)	Distribution Revenue (2022)	100.0	38.9	4.8	15.5	26.1	8.3	3.9	2.0	0.5	0.0	Revenue Offsets (2025)	100.0	35.6 35.9	4.3 4.4	14.6 15.0	17.4	4.8	1.8	21.1 20.5	0.3	0.0	LRAMVA	100.0	-0.5 -0.9	0.0 -0.1	-21.9 -23.9	59.0 60.4	12.9 15.6	50.6 48.9	0.0	0.0	0.0	Distribution Revenue GS>50 kW (2022)	100.0	0.0	0.0	0.0	64.0	20.3	9.6	5.0	1.1	0.0	# of RPP Customers (2022)	100.0	78.8	11.9	8.8	0.4	0.0	0.0	0.0	0.1	0.0																			
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	Updated Table 16 Proposed Rate Rider Allocators and Recovery Periods to minimize the bill impacts.	<p>Table 16: Proposed Rate Rider Allocators and Recovery Periods</p> <table border="1"> <thead> <tr> <th>Rate Riders</th> <th>Allocators</th> <th>Proposed Recovery Period (Years)</th> <th>Rate Rider Start Year</th> <th>Rate Rider End Year</th> </tr> </thead> <tbody> <tr> <td>PILs and Tax Variance</td> <td>Distribution Revenue (2022)</td> <td>1.00</td> <td>2025</td> <td>2025</td> </tr> <tr> <td>Wireline Pole Attachments Rev</td> <td>Revenue Offsets (2025)</td> <td>1.00</td> <td>2027</td> <td>2027</td> </tr> <tr> <td>Gain on Property Sale</td> <td>Distribution Revenue (2022)</td> <td>1.00</td> <td>2027</td> <td>2027</td> </tr> <tr> <td>Impact for USGAAP (Actuarial loss on OPEB)</td> <td>Distribution Revenue (2022)</td> <td>1.00</td> <td>2025</td> <td>2025</td> </tr> <tr> <td>Customer Choice Initiative</td> <td># of RPP Customers (2022)</td> <td>1.00</td> <td>2027</td> <td>2027</td> </tr> <tr> <td>External Driven Capital</td> <td>Distribution Revenue (2022)</td> <td>1.00</td> <td>2026</td> <td>2026</td> </tr> <tr> <td>Operations Center Consolidation Plan</td> <td>Distribution Revenue (2022)</td> <td>1.00</td> <td>2025</td> <td>2025</td> </tr> <tr> <td>Excess Expansion Deposits</td> <td>Distribution Revenue GS>50 kW (2022)</td> <td>5.00</td> <td>2025</td> <td>2029</td> </tr> <tr> <td>Change in Useful Life of Assets (2025-2026)</td> <td>Distribution Revenue (2022)</td> <td>2.00</td> <td>2025</td> <td>2026</td> </tr> <tr> <td>Lost Revenue Adjustment Mechanism (LRAMVA)</td> <td>LRAMVA</td> <td>5.00</td> <td>2025</td> <td>2029</td> </tr> <tr> <td>Innovation Fund</td> <td>Distribution Revenue (2022)</td> <td>1.00</td> <td>2029</td> <td>2029</td> </tr> <tr> <td>Ultra-Low Overnight Rate Costs</td> <td># of RPP Customers (2022)</td> <td>1.00</td> <td>2025</td> <td>2025</td> </tr> <tr> <td>Green Button Initiative Costs</td> <td>Distribution Revenue (2022)</td> <td>4.00</td> <td>2025</td> <td>2028</td> </tr> <tr> <td>Wireless pole attachments Rev</td> <td>Revenue Offsets (2025)</td> <td>3.00</td> <td>2026</td> <td>2028</td> </tr> <tr> <td>50/60 Eglinton Proceeds of Sale Deferral Account</td> <td>Distribution Revenue (2022)</td> <td>4.00</td> <td>2026</td> <td>2029</td> </tr> <tr> <td>Change in Useful Life of Assets (2026-2029)</td> <td>Distribution Revenue (2022)</td> <td>4.00</td> <td>2026</td> <td>2029</td> </tr> </tbody> </table>	Rate Riders	Allocators	Proposed Recovery Period (Years)	Rate Rider Start Year	Rate Rider End Year	PILs and Tax Variance	Distribution Revenue (2022)	1.00	2025	2025	Wireline Pole Attachments Rev	Revenue Offsets (2025)	1.00	2027	2027	Gain on Property Sale	Distribution Revenue (2022)	1.00	2027	2027	Impact for USGAAP (Actuarial loss on OPEB)	Distribution Revenue (2022)	1.00	2025	2025	Customer Choice Initiative	# of RPP Customers (2022)	1.00	2027	2027	External Driven Capital	Distribution Revenue (2022)	1.00	2026	2026	Operations Center Consolidation Plan	Distribution Revenue (2022)	1.00	2025	2025	Excess Expansion Deposits	Distribution Revenue GS>50 kW (2022)	5.00	2025	2029	Change in Useful Life of Assets (2025-2026)	Distribution Revenue (2022)	2.00	2025	2026	Lost Revenue Adjustment Mechanism (LRAMVA)	LRAMVA	5.00	2025	2029	Innovation Fund	Distribution Revenue (2022)	1.00	2029	2029	Ultra-Low Overnight Rate Costs	# of RPP Customers (2022)	1.00	2025	2025	Green Button Initiative Costs	Distribution Revenue (2022)	4.00	2025	2028	Wireless pole attachments Rev	Revenue Offsets (2025)	3.00	2026	2028	50/60 Eglinton Proceeds of Sale Deferral Account	Distribution Revenue (2022)	4.00	2026	2029	Change in Useful Life of Assets (2026-2029)	Distribution Revenue (2022)	4.00	2026	2029
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Pre-Filed Evidence	Description of the Revisions	Numerical Differences				
		Change in Useful Life of Assets (2025-2027)	Distribution Revenue (2022)	5.00	2025	2029
		Cloud Computing Costs	Distribution Revenue (2022)	5.00	2025	2029
		Getting Ontario Connected Act Variance Account	Distribution Revenue (2022)	5.00	2025	2029
		Operations Center Consolidation Plan	Distribution Revenue (2022)	5.00	2025	2029
Revenue Requirement Workforms (Exhibit 6, Tab 1, Schedules 2-6)	Updated 2025-2029 RRWF to reflect the updated 2025-2029 forecast from April 2, 2024.	N/A				
Cost Allocation Model (Exhibit 7, Tab 1, Schedule 3)	Updated to reflect the updated 2025-2029 forecast from April 2, 2024.	N/A				
OEB Appendix 2-W – Bill Impacts (Exhibit 8, Tab 6, Schedule 1)	Updated to reflect the updated 2025-2029 forecast from April 2, 2024.	N/A				