



Cornerstone Hydro Electric Concepts Association Inc.

October 19, 2009

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O.Box 2319
Suite 2700
Toronto, Ontario
M4P 1E4

Re: Comments on EB-2009-0161 Electricity Reporting & Record Keeping

Dear Ms Walli:

Attached please find Cornerstone Hydro Electric Concepts Association's comments with respect to EB – 2009-0161

The comments have been prepared by Brenda Pinke of Innisfil Hydro on behalf of CHEC. Brenda can be contacted at Innisfil Hydro, 2073 Commerce Park Drive, Innisfil, ON, L9S 4A2. Brenda can be reached at (705) 431-6870 Ext. 262 or brendap@innisfilhydro.com . Please feel free to contact either one of us with respect to the attached comments.

Yours truly,

Gord Eamer

Gordon A. Eamer, P.Eng.
Chief Operating Officer
43 King St. West
Suite 205
Brockville, ON
K6V 3P7
gee@ripnet.com
613-342-3984

CHEC Members

Centre Wellington Hydro	COLLUS Power
Innisfil Hydro Distribution Systems	Lakefront Utilities
Lakeland Power Distribution	Midland Power Utility
Orangeville Hydro	Parry Sound Power
Rideau St. Lawrence Distribution	Wasaga Distribution
Wellington North Power	West Coast Huron Energy

**Cornerstone Hydro Electric Concept Associations Inc Response to Board File:
EB-2009-0161**

The CHEC group generally supports the integration of all reporting requirements and proposed amendments to the Electricity Reporting and Record Keeping Requirements with the following exceptions:

Section 2.1.4 Reporting on Service Quality Requirements / System Reliability Indicators

In order to provide consistency for reporting timelines, the CHEC group recommends a change to the reporting timeline for Section 2.1.4 from January 31 to April 30 on an annual basis.

With this amendment all quarterly reporting will be required to be submitted on the last day of the second month after the quarter end and all annual reporting shall be submitted by April 30, thus allowing reasonable time to prepare and validate all submitted data.

Section 2.1.4.2 Reporting on System Reliability Indicators

In this section the Board has outlined definitions for the purposes of reporting on the three system reliability indicators.

Interruption has been defined as follows;

3. "interruption" means the loss of electrical power, being a complete loss of voltage and not a part power situation, to one or more customers, and includes an interruption scheduled by the distributor, an outage scheduled by a customer, an interruption by order of emergency services personnel, or disconnection for non-payment or disconnection for power quality issues such as sags, swells, impulses or harmonics."

The proposed definition does not support a true measurement of overall system reliability reflected in the SAIDI/SAIFI/CAIDI indicators. System reliability should only be measured on planned (maintenance by the distributor) and unplanned outages. Inclusion of outages that do not reflect aspects of system reliability such as customer scheduled outages and disconnection for non-payment will skew both performance and reliability indicators with the current definition of interruption. Additionally, if the definition is not changed the ability to collect and report the defined data would be a material change.

Therefore, the CHEC group proposes that the definition of "interruption" be modified to remove all references to customer scheduled outages, disconnection for non-payment

and interruption by order of emergency personnel. This request will also align the definition of “interruption” with Section 2.3.12 of the RRR – Cause of Interruption Codes.

We thank you for the opportunity to provide comment on the proposed changes to the Electricity Reporting and Record Keeping Requirements.