



April 19, 2013

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4

via RESS and email

Dear Ms. Walli:

**RE: Consultation on Proposed Amendments to the Electricity Reporting and Record Keeping Requirements
Phase 2 – Initiative to Develop Electricity Distribution System Reliability Standards
Board File No.: EB-2010-0249**

On March 20, 2013, the Ontario Energy Board (the “Board” or the “OEB”) released proposed amendments to the Electricity Reporting and Record Keeping Requirements (“RRRs”), along with a Board Staff Report highlighting the results of consultations held with a broad-range of stakeholders on distribution system reliability reporting.

This is the submission of the Coalition of Large Distributors (the “CLD”) and Hydro One Networks Inc. (“Hydro One”). The CLD consists of Enersource Hydro Mississauga Inc., Horizon Utilities Corporation, Hydro Ottawa Limited, PowerStream Inc., Toronto Hydro-Electric System Limited and Veridian Connections Inc.

The CLD and Hydro One appreciate the opportunity to offer comments on this initiative. As referred to in the “*Report of the Board Renewed Regulatory Framework for Electricity Distributors: A Performance-Based Framework*”, accurate and consistent system reliability data is essential in measuring and assessing operational performance.

The following CLD and Hydro One comments are guided by the objectives of cost-effectiveness, network reliability and efficiency and value for customers.

Reliability Definitions:

Overall, the CLD and Hydro One believe the proposed revisions to the reliability definitions will improve the accuracy and consistency of reliability data. The development of sample outage scenarios and



reporting categories by the Reliability Data Working Group (the “Working Group”) will further improve the integrity of the data reported.

The continued practice of defining interruption start times on the basis of the first indicator (i.e., distributor determination or customer communication) accommodates the operational circumstances of each distributor. The CLD and Hydro One believe the definition is adequate; however, the existence of ‘options’ may create inaccuracies if outage durations are utilized in metrics that are then used to compare distributors’ performance. To mitigate this risk, it would be necessary to identify which distributors rely primarily on distributor determinations versus customer notifications when outages occur, or, the percentage thereof.

The additional reporting requirement for identifying when new system reliability measurements and reporting practices or system technologies impact performance should account for both transitional and end-state improvements. For example, a technology improvement at the field level could be rolled out over multiple years; therefore, reliability improvements during the implementation phase would not reflect the full impact until implementation is complete. It is recommended that system performance impacts reported during a transitional period be identified as such.

Finally, for alignment with the CEA standards, the proposed definition of an “Interruption” should be amended to read “...the loss of electrical power, being a complete loss of voltage, **of one minute or more in duration**, to one or more customers....”

Measuring Practices:

The CLD and Hydro One support the recommendation that measurement practices be determined by distributors, for the time being.

As noted in the Board Staff Report (Section C.1, page 9), variances can occur between actual customer outages and those recorded by distributors. While eliminating these variances may be cost-prohibitive, relative to the benefit, the CLD and Hydro One do support establishing a reasonable minimum standard of automation for measurement practices in the future development of performance benchmarks.

Normalization and Reporting on Causes of Outages:

The CLD and Hydro One support the proposed approach for identifying and reporting the causes of outages, striking a reasonable balance between the desire for more specific reliability data and the associated costs of tracking, compiling and reporting the related data.

Through the efforts of the Working Group, the categorization of causes will reduce the risk of reporting inaccuracies. For example, “Defective Equipment” includes “imminent failures detected by maintenance”; however, some distributors currently report these scenarios under the category of a “Scheduled Outage”. Other distributors rely on the new CEA sub-cause codes. Similarly, while including



“assets owned by another party” will provide more accuracy in the reporting of “Loss of Supply”, guidance is required on the consistent treatment of customer owned primary equipment failures, as ownership demarcation can vary within a distributor’s service territory.

Customer Specific Measures:

The CLD and Hydro One support the exclusion of worst performing feeders as a reportable reliability measure; however, distributors with the ability to track this information are likely to continue doing so for system planning purposes.

With respect to the next phase of this initiative, the CLD and Hydro One agree that measuring reliability performance at a customer level is beneficial, particularly from a customer service and system improvement perspective, provided the costs and associated benefits are justifiable.

General Comment:

The description for Loss of Supply in Attachment A, page 4 should include “...problems associated with assets owned and/or operated by another party....”, as noted in the revised definition in Attachment A, page 2 (6).

Conclusion:

The CLD and Hydro One support the proposed amendments to the RRR as an effective step towards improving the accuracy and consistency of reported reliability data. As experience is gained and technology advances, the type of information that will become available and the manner in which it is collected are expected to improve reliability data accuracy and efficiency further. The CLD and Hydro One look forward to assisting the ongoing efforts of the OEB and Working Group in the development of accurate and informative reporting standards.

Should you have further questions on this submission, please contact the undersigned.

Yours truly,
(Original signed on behalf of the CLD and Hydro One by)

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