



December 3, 2015

Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON, M4P 1E4

The Regional
Municipality
of Durham

Finance Department

605 ROSSLAND RD. E.
P.O. BOX 623
WHITBY ON L1N 6A3
CANADA
905-668-7711
Fax: 905-666-6256

www.durham.ca

R.J. Clapp, CPA, CA
Treasurer and
Commissioner of
Finance

Attn: Ms. Kirsten Walli, Board Secretary
Ms. Stephanie Chan, Audit & Performance Assessment

Re: Notice of Proposal – Amend Codes and Rules
(OEB File No. EB-2015-0247)

The Region has received notification from the OEB regarding the proposed amendments to several regulatory instruments pursuant to Sections 45 and 70.2 of the *Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B*.

It is understood (as described in the OEB Notice of Proposal) that there are a number of proposed amendments which will establish minimum record retention periods of the current calendar year plus nine years (Mandatory Retention Period), for all records that regulated entities are required to maintain pursuant to the Act, other applicable statutes and regulations thereunder, the OEB's regulatory instruments, licenses and OEB orders.

The Region supports the proposed amendments as it will serve to provide a degree of consistency for regulated entities in their reporting requirements. Further, in reviewing the documentation and potential implications for the Region's end-use accounts which are serviced predominantly by four electricity local distribution companies and one major natural gas distributor, there are several areas in which the Region wishes to provide feedback given its experience with data collection from its respective local distribution companies.

Regarding the types of data and records that should be retained, there continue to be growing requirements for data collection and reporting around energy consumption, benchmarking and measurement and verification of performance for facilities and operations (i.e. *O.Reg 397/11* under the *Green Energy Act*).

"Service Excellence
for our communities"

If this information is required in an accessible format, please contact the Accessibility Co-ordinator at 1-800-372-1102 ext. 2009.

These are in addition to normal day-to-day expenditure management processes as it relates to billing validation of applicable charges including settlement of retail billing agent services and other fixed commodity price arrangements, where applicable. Given this, it is recognized that the collection process and maintenance of a complete and up-to-date repository of historical data by regulated utilities can be significant.

Presentation of billing data is generally non-uniform and not all regulated utilities provide bulk account electronic data solutions in a compatible and usable file format. Given this, the access to an extensive set of historical billing records, inclusive of all relevant cost components and consumption would enable a greater degree of analysis, profiling and assistance with overall energy management planning. Further, such a source of information would also provide an extended utility data collection option for end-users should existing records become compromised in any way.

As part of the stakeholder consultation process, the following feedback is provided:

- Section 11.3 of the Retail Settlement Code (electricity) describes historical billing being available for 24 billing months where additional historical data may be made available at the discretion of the distributor. Request confirmation that availability and access to historical data through request to the distributor, including billing records, may be extended to coincide with the proposed Mandatory Record Retention Period.
- Also confirm that such an expanded retention of data would apply to natural gas information as it relates to Sections 5.1.1 and 5.4.1 of the Gas Distribution Access Rule. It is also recommended that this work to ensure historical data availability to end-users, where possible.
- For formatting of records that must be retained as part of the Mandatory Record Retention Period, and where data can be made accessible to end-use customers, for historical utility billing and related information, it is recommended that an electronic version utilizing a common data exchange format (i.e. spreadsheet, comma-separated values) be used/maintained which permits simplified import and export functions. Further, a consolidated data reporting format should be applied uniformly to allow for collection and use of a greater number of records (rather than individual billing formats) would likely provide the greatest degree flexibility to the widest range of users;

- Where such historical data/information is maintained, and end-user access is provided, it is recommended that such information include the full range of billing detail which itemizes each respective customer charge, cost structure individually in addition to corresponding consumption and/or demand (where applicable) to allow for reconciliation and traceability to total billed values. While this is applied by some regulated utilities (where consolidated electronic billing data options are available), it is not applied uniformly across all as some are compartmentalized into billing sub-categories (i.e. regulatory charges);
- Further to the comment above, access to a more extensive and centralized repository of historical interval meter, net system load shape and account-specific Time-of-Use (TOU) data as available through electricity utilities to align with the Mandatory Record Retention Period is recommended. Access to data with this granularity can further assist with verification and settlement of various retail arrangements (i.e. fixed price arrangements, billing agent services).

While the Region is generally supportive of the proposed amendments for expanded data retention periods, enabling greater access to such information by end-users can serve to enhance customer relations between the regulated utility and end-user as well as increase information transparency and efficiency from the end-user standpoint supported by improved data collection processes.

We thank you for the opportunity to provide input as part of this stakeholder comment process and we look forward to your feedback on this matter. Please do not hesitate to contact the Region at 905-668-7711 x2300 if you have any questions.



R.J. Clapp, CPA, CA
Commissioner of Finance

cc: Cliff Curtis, Commissioner of Works
Mary Simpson, Direction of Financial Planning and Purchasing
Joanne Cermak, Director of Financial Services
John Presta, Director of Environmental Services
Jenni Demanuele, Director of Business Services