The Voice of Ontario's Electricity Distributors

January 11, 2016

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

Via web portal and by courier

Dear Board Secretary:

Re: **Board File No. EB-2015-0182**
Electricity Distribution System Reliability: Major Events, Reporting on Major Events and Customer Specific Measures

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies (LDCs). The EDA represents the interests of approximately 70 publicly and privately owned LDCs in Ontario.

On December 7, 2015 the Ontario Energy Board (OEB) issued its *Report of the Board on Electricity Distribution System Reliability: Major Events, Reporting on Major Events and Customer Specific Measures* (hereinafter "the Report"). The Report addresses three initiatives:

- Develop a definition of a Major Event that will be used to normalize reported reliability data;
- Develop criteria and new reporting requirements that will be used to evaluate a distributor's response to a Major Event; and
- Establish an approach to implementing "customer specific" system reliability measures.

The EDA understands that the Report relied on input from a System Reliability Working Group which included many distributors.

Defining A Major Event

The EDA is supportive of creating a definition of a Major Event, as the exclusion of major events from an LDC's reliability data is required for more accurate assessments of LDC reliability performance. The OEB has proposed three options for identifying a Major Event for the purpose of normalizing reliability data:

- the IEEE standard 1366;
- the IEEE approach using a two day rolling average; and
- a fixed percentage approach (i.e. 10 per cent of customers affected).

The EDA understands that once a distributor makes a decision on which approach to use, they would continue to use that approach unless there was a specific reason for a change (i.e. merger between two distributors using different approaches). The EDA supports providing three options to recognize that

Electricity Distributors Association
3700 Steeles Ave. W., Suite 1100, Vaughan, Ontario L4L 8K8 Tel 905.265.5300 1.800.668.9979 Fax 905.265.5301 email@eda-on.ca www.eda-on.ca

factors such as size and system characteristics can impact which approach works better in identifying Major Events for a specific distributor.

Providing options does introduce the risk of inconsistency amongst distributors in identifying Major Events, such as in cases where more than one distributor is affected by the same event. The EDA suggests that the OEB identify the IEEE 1366 approach as the default methodology, with a distributor justifying why it would choose to use another option. Distributors need to better understand the implications of using one approach over another, and the EDA plans to work with members in understanding the tradeoffs.

The OEB is asking whether reliability performance from the past five years can be recalculated using the chosen approach. Data on the number of customers impacted and details on the past major outages would likely be available from the past five years.

Monitoring and Reporting of Major Events

The OEB is proposing distributors file a report within 60 days following a Major Event which addresses a series of questions (29 in total) on what happened before, during and after the event.

EDA members believe that given the number of questions, the report will require more effort to prepare in order to be submitted to the OEB, and suggest a 90 day period following a Major Event would be more reasonable for filing a detailed report.

Generally the questions posed for reporting activities *prior* to the event were for the most part reasonable. The first four deal with an event where the distributor had prior warnings and what they did to prepare, and the other questions address training and mutual aid agreements. The questions for *after* the event were also reasonable.

Members expressed most of their concerns regarding the nineteen proposed questions for *during* the event. EDA members believe many of the questions are either too specific, or require further clarification and or are not necessarily relevant to assessing distributor performance in this area. The EDA believes that further consultation is required to identify what relevant details should be included in the report, and recommends that the System Reliability Working Group be reconvened, along with communication staff from distributors, to rework the questions or reporting guidelines.

For example, the second question is problematic as members noted that they would not necessarily know whether other nearby distributors experienced the same event and the degree to which the event impacted them, unless they would ask them directly. It was suggested that the regulator would be in a better position to know whether other nearby distributors experienced a Major Event.

The third question regarding the percentage of staff available at the start of the event and utilized during the event should be reworded since a large proportion of the distributor's staff would not be required to be on-call during events and would not be utilized. The question should address what percentage of on-call personnel are available at the start and what percentage of on-call personnel were utilized.

The fifth question asks when the first estimated times of restoration (ETR) were issued from the start of the first outage. This question needs reworking as outage notices with a preliminary ETR are often sent

within minutes of when the distributor is aware of an outage. It may be many more minutes or even hours before the distributor is aware of the extent of an outage and whether it is a major event, which would require a new ETR notification.

The sixth question asks whether updated ETRs were issued and when and how many. Again this question may need rewording and could be combined with question five to ask distributors to describe how and when they issued ETRs during the Major Event.

The seventh question asks what channels of communication were used to deliver ETRs. This question repeats question four which asks whether ETRs were issued and through what channels.

The ninth question asks how many times the distributor sent information to customers through the media. This question should be revised or deleted as it is dependent on whether the media picked up the message, and distributors don't necessarily track which media have relayed the message. A distributor could send several updates through press releases, but local media may not necessarily relay the message and during the outage distributors are focused on restoring power and responding to inquiries and would not necessarily know what the local media is reporting. The question should focus on whether the distributor issued press releases or email or twitter messages to media channels.

The tenth question asks how many customers phoned the distributor during the event. This question also needs clarification or rewording. During Major Events there may be so many calls that many customers will find busy signals. Distributors do not have the ability to track customers who tried to call and did not get through. The question could ask how many calls were received during the outage.

The fourteenth question is related to this as it asks for the percentage of total outage time that the phone lines were inaccessible. As noted above distributors cannot track when customers calling receive a busy signal.

Question eleven asks what percentage of customer calls were satisfied by the distributor's IVR system. This question assumes the distributor has an IVR system and not all distributors use an IVR system. For those that do use an IVR typically a large percentage of received calls are addressed through the IVR system.

Question twelve and thirteen asks percentage of calls answered by a live representative and what percentage of these calls were answered within 90 seconds. The systems are already in place to measure whether calls are answered within 90 seconds. If the distributor does not use an IVR system, all the calls will be answered by a live rep or a recorded message. The EDA believes the questions related to calls answered by a live representative should not be included in the report.

Question nineteen asks the distributor to explain the processes used to undertake damage assessment. The EDA believes this question was too specific, as there could be different approaches to damage assessment depending on the type of major event experienced. For example, in the aftermath of a storm distributor crews could be dispatched to focus on restoring power. These field crews would naturally have to conduct some damage assessment before effecting repairs and performing restoration, but the damage assessment would not necessarily be a separate, specifically defined undertaking.

The OEB has asked whether the OEB should make the Major Event reports available through its own website. The EDA believes the reports should not be publicly available as they include many details and would require industry knowledge to understand.

Customer Specific Reliability Measures

The OEB is proposing to mandate in the future customer specific reliability measures such as customers experiencing multiple interruptions (CEMI) and/or customers experiencing long duration interruptions (CELDI). These new measures would require a distributor to have an up-to-date connectivity model and sophisticated, real-time operating systems such as a GIS and an Outage Management System. Mandating all distributors of all sizes to implement these systems may not be justifiable from a cost-benefit perspective, because economical solutions are often not available to improve service to customers experiencing poorer reliability (e.g. single line service which would require an additional line to improve reliability).

The EDA supports the approach of initiating a pilot project to review the implementation requirements by involving distributors, at different points in the progression towards a connectivity model and outage management system (OMS), to take on the new investments (including data management, and staff resources to maintain the connectivity model) to meet the new monitoring requirements for CEMI or CELDI. The results of the pilots should not be presumed as it may find that it is not practical at this point to implement this new measure for many distributors. The EDA supports waiting until 2018 after the results of the pilot are understood to decide when it may be practical to mandate these new customer reliability measures.

As an interim measure distributors could report on the worst performing circuits, which would provide insight into underperforming areas on a distributor's system, and would allow the OEB to develop an understanding of the overall scope of the issue and whether there are practical cost effective investments to improve customer reliability.

Sincerely,

Justin Rangooni
Senior Director, Conservation and Energy Policy
:mt