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October 16, 2009

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

Dear Ms. Walli:

Re: EB-2009-0161 – Comments of the London Property Management Association

This letter is in response to the Board's September 21, 2009 letter related to the Consultation on Proposed changes to the Electricity Reporting and Record Keeping Requirements and provides the comments of the London Property Management Association ("LPMA") on the proposed changes to the Electricity Reporting and Record Keeping Requirements. Three paper copies have been provided to the Board and an electronic version has been filed through the Board's web portal at www.err.oeb.gov.on.ca.

Comments

a) Section 2.1.3 c)

Further clarity could be added to this section to clearly indicate whether "total street lighting .... and sentinel lighting" means the total in aggregate or the total of each of street lighting and sentinel lighting.

b) Section 2.1.4.2, part 3

It is not clear to the LPMA that the definition of "interruption" used is appropriate for the calculation of SAIDI and SAIFI. In particular, it is not clear why an outage scheduled by a customer, an interruption by order of emergency services personnel or disconnection for non-payment should be included in this definition. These situations are not indicators

of system reliability. Inclusion of these situations in the definition of interruption would appear to muddy the waters when it comes to true system reliability statistics.

c) Section 2.1.4.2.2 d)

The adjusted SAIDI formula shown of (a) – (b)/(c) is mathematically incorrect. It should be ((a) – (b))/(c).

d) Section 2.1.4.2.4 d)

The adjusted SAIFI formula shown of (a) – (b)/(c) is mathematically incorrect. It should be ((a) – (b))/(c).

Sincerely,

Randy Aiken
Aiken & Associates