



**PUBLIC INTEREST ADVOCACY CENTRE**  
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**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

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VIA MAIL AND EMAIL

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: Consultation on Proposed Changes to the Electricity Reporting and Record Keeping Requirements**

**Board File Number: EB-2009-0161**

**Vulnerable Energy Consumers Coalition's Comments**

As Counsel to the Vulnerable Energy Consumers Coalition (VECC), I am writing, per the Board's Notice of September 21<sup>st</sup> to provide VECC's comments on the proposed changes. The comments are organized according the sections of the proposed Reporting Requirements.

*Reporting - Section 2.1.2*

With respect to part (b), VECC can appreciate why the number of consumers enrolled with specific retailers may need to be considered confidential. However, in VECC's view the total number of consumers (by rate class) enrolled with all retailers should be publicly available. Alternatively, Section 2.1.5.4 should be revised to require this information to be filed (for public release) on an annual basis.

VECC notes that the information required under parts (c) and (d) is not considered confidential and supports the public release of this information on at least an annual basis.

*Reporting – Section 2.1.3*

Similarly, with respect to part (b) of this section, it is VECC's view that the information should be made publicly available on an aggregate basis at least once a year.

*Reporting – Section 2.1.4.2.3 and Section 2.1.4.2.4*

VECC notes that the numerator for SAIFI is total number of sustained "customer interruptions" for the month as opposed to simply the total number of interruptions as the proposed amendments suggest. The difference is that for each "interruption" the number of customers affected is included in the "sum".

*Reporting – Section 2.1.4.2.5 and Section 2.1.4.2.6*

In VECC's view the proposed wording is open to misinterpretation and could be taken to mean only interruptions affecting all customers should be included in the calculation of the measure. VECC notes that the 2000 Electricity Distribution Rate Handbook (page 7-8) uses different terminology and suggests that it be repeated here.

*Reporting – Section 2.1.5.5*

It would be useful if the term "maximum monthly peak load" was clearly defined. For example, does it reflect total consumer gross load, including metered generation delivered via shared consumer connection points)?

*Reporting - Section 2.1.5.6*

The Board should require electricity distributors to report their "regulatory return" using a format similar to the Revenue Requirement Work Form distributors are now required to file in conjunction with their draft rate orders.

*Record Keeping - Section 2.3.5 and Section 3.3.4*

VECC questions the need for confidentiality with respect to the dollar value for affiliate transaction (part (c)) and notes that most audited financial statements include details regarding the value of affiliate transactions and the types of services involved. In addition VECC does not see any reason why the form of the price/cost determination for each transaction should be kept confidential and notes that this detail is frequently provided during cost-of-service based reviews of distributors'/transmitters' rate applications.

VECC also questions the \$100,000 limit, particularly for small electricity distributors and transmitters. VECC suggests that the limit be set the lesser of \$100,000 or 0.5% of the distributor's/transmitter's most recently approved distribution revenue requirement.

Thank you for the opportunity to comment.

Yours truly,

Michael Buonaguro  
Counsel for VECC