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Susan Frank

Vice President and Chief Regulatory Officer
Regulatory Affairs

BY COURIER

October 19, 2009

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

Dear Ms. Walli:

EB-2009-0161 – OEB Electricity Reporting and Record Keeping Requirements – Hydro One Networks' Comments on the Boards Proposed Changes

In response to the Board's letter dated September 21, 2009, Hydro One Networks provides the attached comments.

Three paper copies of the attached document are being provided by courier to the Board and I have also attached proof of successful submission of these comments through the Board's Regulatory Electronic Submission System as directed in the Notice.

Sincerely,

ORIGINAL SIGNED BY ANDY PORAY SUSAN FRANK

Susan Frank

Attach. (3)

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15 (Sched. B);

AND IN THE MATTER OF a proceeding pursuant to
subsection 70.2 of the *Ontario Energy Board Act, 1998*
to amend the Distribution System Code

**SUBMISSION OF HYDRO ONE NETWORKS INC.
REGARDING THE BOARD'S PROPOSED CHANGES
TO ELECTRICITY REPORTING AND RECORD KEEPING REQUIREMENTS**

OCTOBER 19, 2009

Contact Information

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Hydro One Networks Inc. (“Hydro One”) generally supports the changes the Board is making to Reporting and Record Keeping Requirements (“RRR”). However, Hydro One has comments on a few specific areas of the Board’s proposed changes to assist the Board in finalizing these amendments to the RRR. Hydro One’s comments are provided under specific headings pertaining to the area of concern and are referenced to the sections in the Board proposed RRR amendments.

Comments on the Revised Proposed Changes

2.1.2 Reporting on Customer Count

2.1.2 Part c) and d)

Hydro One does not have readily available the information on the number of properties or the number of units that fall under section 3.3.4 of the Supply Service Code, the proposed information is not stored electronically in Hydro One’s Customer Information System and would require a significant amount of manual work to collect, consolidate, review and report the information in a consistent and sustained manner.

2.1.4 Reporting on Performance Measurements

2.1.4.2 Reporting on System Reliability Indicators, Part 3

Hydro One does not support the proposal to extend the definition of “Interruptions” to include the following additions:

- An outage scheduled by a customer,
- An interruption by order of emergency services personnel, and
- Disconnection for non-payment of bills

In Hydro One’s view the proposed additions do not in themselves provide useful information in respect of power quality or reliability of distribution system performance or system deficiency. These additional considerations are not directly related to or affected by distribution system performance per se and their inclusion would alter the SAIDI, SAIFI or CAIDI indices that might lead to misleading interpretation. For example, if “disconnections for non-payment” are counted as interruptions in SAIDI and CAIDI these Indices will likely assume extremely high values that will not be a measure of actual distribution system performance.

2.1.4.2.2 SAIDI (part d) and 2.1.4.2.4 SAIFI (part d)

Hydro One notes that there is an apparent error in the SAIDI and SAIFI formulae that are located on pages 10 and 11 respectively. As currently read the formula are shown as (a)-(b)/(c) whereas these should read [(a)-(b)]/(c).

2.1.4.2.7 Momentary Average Interruption Frequency Index (MAIFI)

Hydro One is not able to calculate this index given the current use of protective devices on distribution feeders such as Circuit Reclosers. The devices are not capable of providing recorded momentary interruptions as they are not designed to do so. Generally these devices will indicate the total number of interruption operations over a period without any indication of the type of individual interruption events. Consequently there is no way of knowing whether an event was momentary or sustained.

Hydro One is working with other utilities in a number of industry forums to determine the validity and usefulness of including MAIFI as a valid index for measuring the reliability of the distribution system.

2.1.5 Reporting on Performance Based Regulation

2.1.5.2 Capital, Part d) i)

Hydro One requests a further clarification on the Board's definition of "Contract work on Self-constructed assets."

2.1.5.2 Capital, Part d) ii)

Hydro One currently outsources many different segments of Capital works and would need clarification on whether the OEB would require all Outsourced work (Engineering, construction, materials and equipment, labour etc.) as well as the level of the detail of the costs. If pursued Hydro One, would require performing a significant amount of manual work to collect and consolidate the amounts that would have been outsourced for capital work.

2.1.5.3 Supply and Delivery Information, Part b) ii)

The Board proposes that Distributors shall report the "Total kWhs delivered to customers in the Large User class (as defined in the distributor's Board-approved tariff of rates and charges)". Hydro One does not have a Large User Class but has a, Board approved, Sub-transmission Class ("ST"). Hydro One's ST Class is comprised of customers that use 0.5 MW and above, are connected at 13.8 kV and above, and who provide their own transformation, as well as all embedded LDCs which encompasses a larger number of customers than the Large User Class would.

2.1.5.4 Customers, Demand and Revenue

Hydro One recommends that the Board amend the 2.1.5 form to include the Sub-transmission Customer Class ("ST") for RRR purposes.

2.1.14 Reporting on Net Metering and Embedded Generation

Hydro One wishes to note that this information is available, although stored in more than one data base and will require two to three days of manual work to collect, consolidate, review and report the information.