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**Susan Frank**

Vice President and Chief Regulatory Officer  
Regulatory Affairs



BY COURIER

August 11, 2010

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

Dear Ms. Walli:

**EB-2010-0172 – Licence Amendment for Exemptions from Certain Electricity Reporting and Record Keeping Requirements – Hydro One Network’s Reply Submission**

On April 19, 2010, Hydro One Networks Inc. (“Hydro One” or “the Company”) requested exemptions from Section 14 of its Electricity Distribution Licence, ED-2003-0043 (“Licence”), pertaining to the following specific Electricity Reporting and Record Keeping Requirements (“RRR”):

- Sections 2.1.4.2.3, 2.1.4.2.4, 2.1.4.2.5 and 2.1.4.2.6, pertaining to the reporting of the “SAIFI” and “CAIDI” measures;
- Section 2.1.4.2.7, pertaining to the “MAIFI” measure;
- Section 2.1.5.5 b), pertaining to reporting of the population within the distributor’s service area; and
- Sections 2.1.5.5 f) and 2.1.5.5 g), pertaining to reporting of route kilometres.

On August 3, 2010, Board Staff submitted comments with respect to each of the above requested exemptions. Hydro One’s response to Board Staff’s submission is set out below.

**Section 2.1.4 – Reporting on SAIFI and CAIDI Measures**

Based on the Board Staff Submission on August 3, 2010, Hydro One will continue to report SAIFI and CAIDI measures as it has done in the past. Hydro One understands that the Ontario Energy Board agrees that this will meet the reporting standards of the Revised RRR and therefore will be in compliance with the Revised RRR.

#### **Section 2.1.4.2.7 – Reporting on MAIFI Measure**

Hydro One does not have the capability to collect the information to measure MAIFI. The Board Staff Submission on August 3, 2010 referenced the following statement in subsection 2.1.4.2.7 in the Revised RRR: *“Distributors that do not have the systems capability that enables them to capture or measure MAIFI are exempted from this reporting requirement”*. Based on this statement, Hydro One is exempted from providing the MAIFI measure.

#### **Section 2.1.5.5 (b) – Reporting on Population**

Hydro One does not have municipal population details. Service area population details have been reported on the municipal population line in previous RRR reports. Hydro One suggests to the Board that it be allowed to continue to provide service area population as it has in the past. Hydro One requests an exemption from the RRR requirements for municipal population details.

#### **Section 2.1.5.5 (f) & (g) – Reporting on Kilometres of Line**

Difference between the circuit kilometres reported in the rate application (EB-2009-0096/Exhibit H/Schedule 15) and the circuit kilometres reported in the RRR from 2005 to 2008:

Hydro One confirms that there was a calculation error in the spreadsheet used to prepare the referenced interrogatory response (EB-2009-0096). The “OM&A per circuit km” information reported in this interrogatory response was incorrect. The circuit kilometres reported in previous RRR reports are accurate.

Based on the Board Staff Submission on August 3, 2010, Hydro One will continue to provide only circuit kilometre information as it has in the past and will breakout the circuit kilometres into overhead and underground. Hydro One understands that the Ontario Energy Board agrees that this will meet the reporting standards of the Revised RRR and therefore will be in compliance with the Revised RRR.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank