



**EB-2010-0172**

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

**AND IN THE MATTER OF** an application pursuant  
to  
section 74 of the *Ontario Energy Board Act*, 1998 by  
Hydro One Networks Inc. seeking an order granting  
a licence amendment to Section 14 of its electricity  
distribution licence (ED-2003-0043) pertaining to  
exemptions from certain Electricity Reporting and  
Record Keeping Requirements.

**BEFORE:** Paula Conboy  
Presiding Member

Cynthia Chaplin  
Member

## **DECISION AND ORDER**

### **THE APPLICATION**

Hydro One Networks Inc. ("Hydro One") filed an application on May 21, 2010 with the Ontario Energy Board (the "Board") under section 74 of the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Schedule B (the "Act") for an order of the Board to exempt Hydro One from certain parts of Section 14 of Hydro One's distribution licence, ED-2003-0043, pertaining to specific Electricity Reporting and Record Keeping Requirements. The Board assigned file number EB-2010-0172 to the application.

Hydro One is requesting exemptions from certain sections of the revised Electricity Reporting and Record Keeping Requirements that came into force May 1, 2010 (the "RRR").

Specifically, Hydro One is seeking exemptions from the following sections of the revised RRR:

- a. 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 System Average Interruption Frequency Index (“SAIFI”) and Customer Average Interruption Duration Index (“CAIDI”) measures;
- b. Section 2.1.4.2.7, pertaining to the Momentary Average Interruption Frequency Index (“MAIFI”) measure;
- c. Section 2.1.5.5 b), pertaining to reporting of population within the distributor’s service area; and
- d. Sections 2.1.5.5 f) and 2.1.5.5 g), pertaining to reporting of route kilometres.

Through the proceeding, it became evident that Hydro One is seeking an exemption from the Board to section 2.1.5.5 b) only. All other sections require a clarification as opposed to an exemption.

## **THE PROCEEDING**

The Board issued a Notice of Application and Written Hearing (the “Notice”) on July 14, 2010. The Notice was published on the Board’s website and on the Applicant’s website. It was also served upon all electricity distributors and registered participants to the Board’s consultation on the proposed amendments to the Board’s Electricity Reporting and Record Keeping Requirements (EB-2009-0161) that culminated in the May 1, 2010 revisions. On July 27, 2010, the Power Worker’s Union (“PWU”) filed a submission on the application. On August 4, 2010, Board staff filed a submission on the application. Hydro One replied to Board staff’s submission on August 11, 2010.

## **THE ISSUES**

### SAIFI and CAIDI Measures

In its application, Hydro One stated that the revised wording of “Interruption for all Customers” in the SAIFI and CAIDI equations (as opposed to the previous wording “Customer Interruptions”) is open to misinterpretation and could be taken to mean only interruptions affecting all customers.

Board staff noted that although the wording in the definition of SAIFI and CAIDI has changed slightly in the revised RRR, the actual data to be reported has not changed. As such, Board staff submitted that Hydro One would be meeting the reporting standards of the revised RRR if they continue to provide the information as they have in the past. PWU noted that Hydro One's interpretation is in line with that of Board Staff.

In its reply submission, Hydro One stated it will continue to report SAIFI and CAIDI measures as it has done in the past.

#### MAIFI Measure

Hydro One claims that it does not have the capability to collect the information to measure MAIFI.

Board staff and PWU both submitted that the specific exemption for Hydro One with respect to the MAIFI measure is not required as the exemption is already available to all distributors within the provisions of the revised RRR. Specifically, subsection 2.1.4.2.7 in the revised RRR states: "Distributors that do not have the systems capability that enables them to capture or measure MAIFI are exempted from this reporting requirement". Hydro One acknowledged this in its reply.

#### Reporting on Municipal Population

Hydro One stated that it does not have municipal population details and would not be able to report this measure and therefore requested an exemption from the RRR requirements for municipal population details. Hydro One suggested to the Board that it be allowed to continue to provide service area population as it has in the past.

Board staff submitted that Hydro One does not require an exemption from reporting on municipal population numbers as the information requested in the revised RRR is consistent to the information provided in past RRR reports.

#### Reporting on Route Kilometres

In the current application, Hydro One submits that in prior years, circuit kilometres have been provided in the RRR. However, Hydro One notes that in the revised RRR route kilometres are required. Hydro One submits that it cannot provide the required

breakdown of route kilometres because it does not presently have the capability to report this data.

Board staff submitted that Hydro One has provided the kilometre information required under the revised RRR in prior years and therefore Hydro One should be required to provide this information on the same basis it has in the past. Board staff also noted that it is examining areas in the revised RRR where clarifications may be helpful and will be looking at clarifying a number of sections of the revised RRR in order to provide guidance to all electricity distributors before the 2010 RRR filings.

Hydro One confirmed a calculation error in regards to circuit kilometres reported in its 2009 electricity rate application and stated that the numbers provided in previous RRR reports were accurate. Hydro One submitted that it will continue to provide circuit kilometre information as it has in the past and will breakout the circuit kilometres into overhead and underground. Such data is important for the benchmarking study to identify utility cohorts.

## **BOARD FINDINGS**

### SAIFI and CAIDI Measures

After considering the application filed by Hydro One and submissions made by the parties, the Board finds that the specific exemptions requested by Hydro One relating to SAIFI and CAIDI are not required. The information required in the revised RRR is identical to what was required in the pre-revised RRR. Hydro One can continue to provide the information as it has in the past and by doing so will be in compliance with the revised RRR.

### MAIFI Measure

The Board confirms that there is no requirement for a specific exemption related to the MAIFI measure as the exemption is already provided for within the provisions of the revised RRR itself.

Reporting on Municipal Population

The fact that Hydro One reported this data in a particular way in the past is not in itself sufficient justification for continued reporting on the same basis. However, the data supplied by Hydro One in past years effectively met the standards of the RRR and it is the Board's view that the revised RRR has not materially changed these requirements. The Board is prepared to grant the exemption so that Hydro One can continue to report using the same method and have assurance that it is in compliance with the RRR.

Reporting on Route Kilometres

The Board understands that the difference between route kilometres and circuit kilometres is ambiguous and will seek to clarify these matters in the future through continued dialogue with market participants. It is the Board's view that Hydro One should continue to report kilometre numbers as it has in the past and by doing so will be in compliance with the revised RRR.

**THE BOARD ORDERS THAT:**

The application by Hydro One Networks Inc. for an exemption from section 2.1.5.5 (b) of the RRR is granted.

**ISSUED** at Toronto, August 26, 2010

**ONTARIO ENERGY BOARD**

*Original signed by*

Kirsten Walli  
Board Secretary