PETERBOROUGH DISTRIBUTION INC.
1867 Ashburnham Drive, PO Box 4125, Station Main
Peterborough ON K9J 6Z5

September 13, 2010

File: A00

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

Dear Ms. Walli:

EB-2010-0249

Peterborough Distribution Inc is pleased to provide comments to the Questions in Attachment A included in the Board correspondence dated August 23, 2010. Further to our letter of September 3, 2010 we do not intend to seek costs at this time for our limited participation in this consultative initiative.

Question Reponses:

- In addition to SAIDI, SAIFI, CAIDI, what, if any other system reliability measures do you use.

  Response:

  MAIFI – momentary average interruption frequency index

- Provide a detailed description of your methodology utilized to record SAIDI and SAIFI. Please include information such as:

    - The degree of use of automated event tracking from SCADA systems, as well as reliance on manual observations.
    - Whether planned outages are tracked separately
    - The level of detail captured throughout a stepped restoration process to record the total customer duration impact.

  Response:

  The SCADA system is used to track the time for outages and restorations at the feeder, substation or bulk system Transformer Station level. Manual observations are used to track outages at the distribution transformer level. Customer counts are obtained from customer information systems that track customer connections to distribution transformers.

  Planned outages are tracked separately using the Code 1 cause of service interruption suggested in the original OEB Distribution System Rate Handbook issued March 9, 2000, section 7.3.2.4 Table 7-2 (Code 9 added in June 27, 2000 correction issued.). These codes are similar to the Canadian Electricity Association (CEA) codes but not an exact match.

  Stepped restoration detail is captured by manual observation to the Control Centre during restoration efforts and noted for input in to the interruption and reliability database. This is tracked at the distribution transformer level, sections of feeder level or station level as required.

- Do you use system reliability performance results in planning, investment and maintenance expenditures, as well as establishing operation and maintenance procedures? Please explain.

  Response:

  System reliability performance is reviewed annually to determine if any specific trends are emerging or continuing prior to maintenance and capital investment planning for future budgets. An example is the annual underground rehabilitation and replacement program to address underground cable and equipment failures. Additional lightning arresters have been installed on feeders or feeder sections that exhibit high incident of lightning related outages. Insulated transformer drop leads and transformer squirrel guard program was initiated by high incident of animal related outages.

- Do you identify and track the impacts of extraordinary events?

  Response:

  Extraordinary events have been tracked in the past although no specific definition of such an event exists. Events tracked in the past in our service territory have been June 2002 City of Peterborough flood, August 2003 Provincial Black Out, July 2004 City of Peterborough Flood (major) and the July 2006 City of Peterborough Wind Storm (Z-Factor application was submitted to OEB for extraordinary repair expenses).

- What other actions do you take to manage system reliability performance?

  Response:

  PDI performs an annual infrared inspection of the distribution system to detect potential system defects to mitigate unplanned outages. PDI has an initiated an annual field inspection to identify potential defects and take appropriate actions to prevent system outages. An annual pole testing program was initiated to identify potential pole failures and determine sections of the distribution system that may need replacement. Annual tree trimming program is in place to mitigate the outages due to tree contacts and wind storms.

PDI trusts that this overview is helpful in determining the discussions that will proceed in this initiative.

Yours very truly,

J.T. (Jeff) Guilbeault, P.Eng.
Vice President, Electric Utility
Telephone (705) 748-9301 ext 1244
Fax (705) 748-0120
e-mail jguilbeault@peterboroughutilities.ca