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September 17, 2010

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board,  
2300 Yonge Street, 27<sup>th</sup> Floor,  
Toronto, Ontario  
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**Re: EB-2010-0249 System Reliability Standards**

Dear Ms. Walli:

Please find below responses from Bluewater Power Distribution Corporation (“Bluewater Power”) in regard to system reliability standards.

1. *In addition to SAIDI, SAIFI, and CAIDI, what if any, other system reliability measures do you use?*

In addition to SAID, SAIFI and CAIDI, Bluewater Power utilizes a number of quality and system reliability measures.

All outages are tracked using a custom designed Microsoft Access database. Details such as date, time of outage, time power restored, location, feeder number, cause and even Operator and lineman comments are documented for every outage. This data is then utilized to query individual monthly statistics for SAIDI, SAIFI and CAIDI. Other details are also captured to ensure that we are able to track, measure and trend extraordinary events. These details include the following;

- underground or overhead classification
- defective equipment classification if applicable
- voltage
- method of restoration
- related outages

Reliability statistics on our 4kv, 8kv and 27.6kv feeders are also tracked separately in an excel worksheet. This allows us to trend outages on individual feeders throughout the year.

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Bluewater Power also tracks leading indicators such as hydro pole inspections, rotten pole replacements, tree trimming orders, animal protection installations and lightning arrester installations to ensure we are working proactively to increase our system reliability and decrease the impact to our customers.

Hydro One reports are used to cross-reference Bluewater Power outage data regularly to ensure that information contained in the outage management database is accurate.

2. Provide a detailed description of your methodology utilized to record SAIDI and SAIFI.

Data that is contained in our outage management database includes a reliance on both automated event tracking from SCADA and manual observations.

- Information on the number of customers is based on feeder, transformer or switch loading data contained in GIS. Outages are tracked downstream in GIS and accurate customer counts are utilized. The length of outages is based on a mixture of customer feedback, call logs, SCADA data and the Operators log book. Outage causes are based on linesmen observations and Operator knowledge of OEB cause classifications and definitions.
  - Planned outages are tracked in the Bluewater Power Outage Management Database. They are tracked as separate outages but do form part of the BWP data and are included in our SAIDI, SAIFI, and CAIDI statistics.
  - Throughout a stepped restoration process, the detail captured throughout depends on whether the outage is overhead or underground. In the case of an underground outage, the detail captured is stepped and accurate. In the case of an overhead outage, the largest number of customers impacted is tracked and the data is less detailed.
3. Do you use system reliability performance results in planning, investment and maintenance expenditures, as well as establishing operation and maintenance procedures? Please explain.

Bluewater Power utilizes all available system reliability trending and statistics to plan for maintenance and capital expenditures. Leading indicator tracking is utilized to measure required capital expenditures and feeder reliability trackers are utilized to understand where our focus is required and outage data is used to track any defective equipment trends.

4. Do you identify and track the impacts of extraordinary events?

Bluewater Power tracks all outages, and does not exclude any 'extraordinary' events. The only exception would be the blackout in 2003 where we did track our indices with and without the impact of the blackout.

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

Bluewater Power has employed a Senior Power System Specialist who monitors and analyzes the number of outages, frequency and location. System inspections, water washing, infra red scans and feeder protection analysis are performed on a regular basis. Animal protection, lightning protection, pole inspection and tree trimming are proactive measures taken to increase reliability to our customer base.

Regards,



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