Hydro One Networks Inc.

 8th Floor, South Tower
 Tel: (416) 345-5700

 483 Bay Street
 Fax: (416) 345-5870

 Toronto, Ontario M5G 2P5
 Cell: (416) 258-9383

 www.HydroOne.com
 Susan.E.Frank@HydroOne.com

Susan Frank

Vice President and Chief Regulatory Officer Regulatory Affairs



#### BY COURIER

November 15, 2011

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

Dear Ms. Walli:

## EB-2011-0118 – Hydro One Networks Inc. Application for Exemption from Section 6.2.6 & 6.2.7 of Distribution System Code – Compliance Plan

As stipulated in Ontario Energy Board's (the "Board") Order #6, Hydro One is filing a compliance plan which demonstrates how Hydro One will come into full compliance with the provisions of 6.2.6 and 6.2.7 of the Distribution System Code (the "Code") by April 11, 2012. The compliance plan is attached.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank (attachments)

# Hydro One Networks DSC Exemption EB-2011-0118

## **Compliance Plan**

#### **INTRODUCTION**

On April 19, 2011, Hydro One Networks Inc. ("Hydro One") applied to the Ontario Energy Board ("the Board") for exemptions from certain requirements in the Distribution System Code ("the Code"), pertaining to the processing of applications for, and the actual connection of, micro-embedded generators. This Compliance Plan was prepared by Hydro One as required by the Board's Decision and Order in the matter (EB-2011-0118), issued on October 11, 2011.

As noted in this proceeding, Hydro One's inability to comply with the requirements of sections 6.2.6 and 6.2.7 of the Code did not stem from insufficient resourcing. Rather, it is attributable primarily to the unpredictable, volatile volume and nature of customer applications and requests for connection, the sequence of activities needed to respond to this demand, and the specific expectations stipulated in the Code. Hydro One requested a six-month exemption period to allow the Company to deal with the backlog of applications and to make the necessary changes to business processes.

The overall objective of this Plan is for Hydro One to achieve full compliance with the provisions of sections 6.2.6 and 6.2.7 of the Code by the end of the six-month exemption period. The actions laid out in the Plan focus on reducing the processing timelines and on improving business relations with generation proponents. Hydro One's ability to achieve full compliance by April 11, 2011, is contingent on certain assumptions that are noted below. In the event that one or more of the assumptions do not hold true, Hydro One has identified additional options to allow it to achieve compliance. These contingency options are introduced here but carry additional risk and potential costs. As such they require further development and evaluation before they can be implemented.

#### UNDERLYING ASSUMPTIONS

Hydro One recognizes that the business environment for micro-embedded generator connections continues to evolve. Nonetheless, the success of this Plan hinges on the existence of business conditions that offer some level of stability. Orderly implementation and operation of the processes that Hydro One has, and continues to, put into place could be rendered ineffectual if faced by significant deviations from the 'norm', as outlined below.

EB-2011-0118 Page 2 of 13

#### Change Management and the MicroFIT Program

Recent activity and customer demand for connection of micro-embedded generators are the result of the Ontario Power Authority's (OPA) microFIT program. As a distributor, Hydro One is in regular contact with the OPA regarding the status of the program, volumes of applications and emerging issues. Program changes can affect Hydro One in two ways:

• Timing and volume of applications: Actual and even anticipated changes to the OPA's programs have been shown to affect the timing and volume of applications received by Hydro One. For example, large volumes of applications were received and processed as customers prepared for changes to the domestic content requirements in the microFIT program. More recently, as part of the microFIT program review launched on October 31, 2011, applications continue to be accepted by the OPA but will not be processed until the new version of the Program Rules and pricing schedule are available once the review is complete. This will likely result in a six-week long drop in the volumes of applications received by Hydro One until mid-December. Depending on how processing is resumed, this hiatus could be followed by a large wave of applications. Program changes that affect localized step changes (e.g. shifts in the geographical distribution of micro-embedded generation activity to concentration in certain regions) can also affect Hydro One's ability to meet timelines.

Even the expectation of changes to the program can lead to sudden fluctuations in demand, as indicated by the high volumes seen prior to the launch of the review and confirmed by evidence from solar equipment suppliers. At this time volumes continue to remain high as proponents who have applied to the OPA prior to the announcement regarding FIT review continue to request an offer to connect.

This Compliance Plan is premised on the assumption that program changes will not be so significant as to drive any radical changes in the flow of applications to Hydro One, or if they are, that Hydro One and the OPA can work together in anticipation of such response, to put into place mitigation measures in advance.

Process changes: To the extent that any changes are made by the OPA to the microFIT program rules and pricing, Hydro One may need to adapt its own back-office and field processes to suit. While no such changes are expected at this time, they could be in the form of changes to the sequence or contents of transactions that proponents must undertake (e.g. application to the OPA and distributors, assessments, payments, information to be provided). Hydro One's ability to meet varied levels of customer interest and demand across the Province relies heavily on careful development and uniform application of its processes for micro-embedded generation connections. Alignment among the various industry players in the face of such changes is important, not only in process design but also from a customer communications perspective, to ensure that adequate, timely and consistent messaging is provided to all customers from various sources.

This Plan assumes that, to the extent that any program changes might affect distributors' processes, there will be sufficient lead time for to assess and seamlessly integrate these changes into their respective processes, so that customer service is not compromised and customer confusion is minimized.

#### Radical Fluctuations in Demand

As noted above, customer demand can change in response to the microFIT program design, rules and pricing. However, customer preferences and market behaviour are also subject to other, sometimes subtle or even unknown forces, such as changes in economic and market conditions. As witnessed in recent months, volumes of applications for micro-embedded generator connections have ranged from an average of 500 to as much as 800 per week. Such fluctuations are not necessarily predictable or even explainable, and can create temporary backlogs in application processing that require time to clear, even with overtime and additional resources. These can cause the processing timelines in s 6.2.6 and the connection timelines in s 6.2.7 to be exceeded. Similarly, the volume of requests for actual connections can fluctuate, result in extreme peaks that can compromise Hydro One's ability to meet the timelines in the Code. It is noted that the activities of processing applications and of connecting customers are not independent and can, at times, require the attention of the very same resources. This is especially true in cases where a site assessment is needed as part of the offer process. Thus, volume spikes in one area can affect timelines in both.

This Plan assumes certain 'steady state' conditions to exist, so that weekly volumes of applications and requests for connection will remain close to those that were witnessed historically and so that there would be few, 'step changes' experienced.

#### Shifts in the Nature of Customer Requests

Customer demand for certain connection configurations can vary over time as a function of technical issues, technology development, pricing and advice from suppliers and contractors, the OPA and even Hydro One. Such a change was recently observed in the early summer of 2011 as more customers opted for connecting their generation in parallel to an existing load connection, but directly to the transformer, and metering it separately rather than through a gang-based meter arrangement. That particular change may have resulted from contractors' advice that such connections are simpler and cheaper for them to implement. However, these arrangements drove an increase in site visits required and in some cases also required additional service conditions to be met (e.g. a pole replacement by Hydro One) before the connection could be made. As noted above, these types of shifts in customer preference, often unpredictable, can compromise both processing and connection timelines. Any shift in the proportion of connections that require a field assessment (currently 10% of all indirect connections) or changes in the technical aspects could require a response in Hydro One's back-office or field operations that may compromise processing and connection timelines.

For the purpose of this Plan, it is assumed that the technical nature of micro-embedded generator connections requested by customers will remain relatively consistent with the present status quo.

EB-2011-0118 Page 4 of 13

#### Storms and other Power Restoration Priorities

As noted below, this Plan acknowledges the more stringent timelines that the Code requires for micro-embedded generator connections, in comparison to the requirements for load connections. Specifically, in its commitment to maintain compliance with both sets of requirements, Hydro One has reprioritized its work to place generation connections above load connections. However, both of these business activities are of lesser priority than Hydro One's emergency response and its response to widespread power restoration needs and storms, especially as these carry potential health and safety consequences. While there is no ability to control unforeseen events such as storms and power outages, Hydro One's operations are equipped to handle such situations by shifting and augmenting resources and deprioritizing normal operations. In such case, work that has been deferred is repackaged and reassigned. However, because the Code requires that microFIT timelines be met 100% of the time, compliance can be compromised if widespread power outages or storms affect Hydro One's operations.

This Plan assumes that such events would be excluded from Hydro One's assessment of compliance with processing and connection timelines. Level 1<sup>1</sup> storms and other events affecting more than 10,000 customers will be monitored, and their impact on compliance will be tracked and reported to the Board.

#### COMPLIANCE PLAN FOR SECTION 6.2.6 OF THE CODE

Hydro One has identified and plans to implement the following actions to achieve compliance with the provisions of section 6.2.6 of the Code. The descriptions below summarize the current state, proposed improvements, and their anticipated timing and impact.

#### **Application Form Improvements**

Hydro One currently requires that the application form ("Form C") be filled in by hand and faxed to Hydro One's Business Customer Centre. Once the fax is received, Hydro One staff performs the necessary data entry work and verifies the Form C for completeness and accuracy. This process can take approximately two to three days, depending on the volume of applications.

Hydro One will convert Form C into a web-based form that can be filled in by customers online and then be automatically submitted to Hydro One with the click of a button. The customer's online completion of the web form will eliminate the need for data entry work by Hydro One. The process is also expected to reduce, but not eliminate, the number of incomplete applications received, as the online process will include field validation checks to prevent the submission of a Form C that does not have all the require fields filled in. However, the potential will remain for the information that is provided to be incorrect. If Hydro One subsequently identifies that there

<sup>&</sup>lt;sup>1</sup> Hydro One defines a Level 1 outage to meet one of the following: (i) a service interruption affecting 10,000 customers; (ii) an outage duration exceeding 24 hours; or (iii) more than 100 active outage incidents.

is incorrect information in a Form C, the application will be deemed to be an incomplete application.

The improvements to the application form could reduce the application handle time by approximately one day. This initiative should be completed by the end of the year.

#### Rescreening of Constrained Projects

As a customer service measure when offers to connect were prohibited by technical constraints, Hydro One has performed project rescreening and then notified customers if and when capacity became available. However, Hydro One has since completed the online Station & Feeder Capacity Calculator and posted it on its external website. With that, customers now have the ability to perform a preliminary check for available capacity themselves. Hydro One will therefore notify customers whose projects face technical constraints that they now can use the Station & Feeder Capacity Calculator, to reassess their proposed project for capacity. If an applicant identifies that capacity may be available, the applicant will be required to reapply to Hydro One for connection.

With the Station & Feeder Capacity Calculator, customers have the ability to perform rescreening themselves. This initiative should be completed by the end of January 2012, allowing Hydro One to focus on the processing of new applications within the mandated timelines.

### <u>Internal Information Exchange Improvements</u>

After performing a site assessment, Hydro One field staff completes a site assessment report and submits it to be manually entered into the customer records. This practice is in place for two main reasons – to maintain central control over data integrity in customer records, and to allow Area Distribution Engineer Technicians (ADETs) to concentrate on site assessments, which only they can perform.

As part of this Compliance Plan, Hydro One will provide Field Business Centre (FBC) administrative staff which support ADETs with direct system access to update customer records after the site assessment has been completed. While this will shift some work to the FBC, the benefit to customers is that information pertaining to their application will be timelier and will not be delayed while awaiting data entry. This initiative will require system enhancements to the existing customer database and FBC staff will require training.

This change will reduce the time to exchange information between groups in Hydro One and will improve the time taken to prepare the estimate. The improvements to the information exchange could reduce the application handle time by approximately one day. This initiative should be completed by the end of January 2012.

EB-2011-0118 Page 6 of 13

#### Pole Identification Process

Currently, the pole identification is part of the site assessment. Hydro One will perform the pole identification process in advance of the site assessment to identify projects where a site visit can be eliminated. A pilot project was undertaken to determine the feasibility of this option and whether it would provide increased efficiencies.

This change will result in the elimination of travel time which could allow Hydro One staff to perform more site assessments in a given day. The amount of time this could save is dependent on the geographic location within Ontario. For example, in Northern Ontario it could eliminate a three hour drive whereas in Southwestern Ontario it could be a thirty minute drive. Hydro One has begun to implement the required internal process changes to affect this change and is targeting the March 2012 for completion.

## **Project Information**

By definition, projects with a standalone (direct) connection configuration ("Group C") are not associated with any existing customer account or connection that can be used by Hydro One to identify and map its location. This creates some difficulties for Hydro One staff who need to reference and locate the project. These difficulties, in turn, result in additional time to conduct the capacity screening and some site assessments. To alleviate this problem, Hydro One has updated Form C to request that the customer or its consultant or contractor identify the Pole ID Number at the customer's proposed project site.

This change allows staff to quickly identify the transformer to which the project's proponent wishes to connect and reduces the time needed to locate the project to perform the capacity screen and in some cases to assess the proposed connection. This change was completed prior to the Board's Decision and Order.

#### Customer Delays

When Hydro One processes applications that require a site visit, the customer often asks to be present for the site assessment. To accommodate such requests, Hydro One may move the appointment to a date that could be much later than Hydro One would have selected in the absence of the customer's request. Currently, Hydro One includes customer-requested delays in the handling time and compliance tracking for processing applications, which increases the reported non-compliance.

Consistent with the direction in the Board's Decision and Order, customer-requested delays will no longer be included in the calculated application processing time. The implementation will, in effect, 'pause the clock' on processing applications during the period where the Company is awaiting the customer's availability for the site visit.

This change will reduce the average handle time, but the extent of its impact is unknown, as Hydro One has not historically tracked customer delays. Hydro One has begun to implement the

required system enhancements to support this change and is targeting the end of January 2012 for completion.

#### **COMPLIANCE PLAN FOR SECTION 6.2.7 OF THE CODE**

Hydro One has identified and plans to implement the following actions to achieve compliance with the provisions of section 6.2.7. The current practices, proposed improvements, and their anticipated timing and impact are noted below.

#### Ontario Regulation 22/04

Hydro One is currently revising construction standards to reflect clarification that was received from ESA regarding compliance with the Electrical Safety Authority (ESA) Ontario Regulation 22/04 (a regulation under the *Electricity Act, 1998* outlining certain standards with which distributors must comply). Once implemented, the revised standards could reduce the work required to connect micro-embedded generators and result in lower costs for the customer. Hydro One expects to complete development of the standard by the end of 2011 and to implement the changes by the end of February 2012.

#### **Service Conditions**

Hydro One will communicate to customers that to achieve connection within five days as stipulated in section 6.2.7 of the Code, there are certain service conditions that must be met before their connection can be made. As such, Hydro One will change its processes to recognize and acknowledge the executed the connection agreement only after all service conditions have been met.

By providing this additional communication to customers, Hydro One intends to ensure that customers will have more information regarding the sequential nature of the connection activities. In addition to facilitating more timely connections, this step will eliminate the need for unnecessary site visits by Hydro One connection crews, only to determine that some prerequisite conditions for connection are still unfulfilled. Equally importantly, Hydro One intends that this would reduce the frustration felt by those customers who do not currently possess a complete understanding of the overall connection process. The change in Hydro One's process is a safeguard for customers who did not follow the sequential steps to get connected. The communication will begin in February 2012, and process changes will be completed soon thereafter.

#### **Customer Delays**

As in cases where a site assessment is required (as noted above), when scheduling a customer connection appointment, Hydro One is often asked to schedule the appointment for a time when the customer can be present. To accommodate that request, the appointment is moved to a date that could be much later than Hydro One would have selected without such a request.

EB-2011-0118 Page 8 of 13

During the six-month exemption period, a customer request that results in an appointment being scheduled beyond the five days permitted by the Code will be deemed to be an appointment scheduled by mutual agreement. After the six-month exemption period expires, Hydro One will follow the direction in the Board's Decision and Order, whereby customer-requested delays are not included in the reported time to connect the proponent; in implementing this change, the 'clock will be 'paused' for the period between Hydro One's initial offered appointment time and the time requested by the customer, so that this period is not reflected in the connection statistics.

Thus, this change will reduce the reported connection time, but the extent of the impact is unknown, because Hydro One has not historically tracked customer delays. Hydro One has begun to implement the required system enhancements to support this change and is targeting January 2012 for completion.

#### PLANS AFFECTING COMPLIANCE WITH BOTH SECTIONS 6.2.6 & 6.2.7

The following action is applicable to both provisions of the Code.

#### Application & Connection Processing Contingency

Hydro One, through its normal operations, is able to process a substantial number of applications and execute a large number of connections. However, there are circumstances, such as increased application volumes, and response to storms and outages, that require Hydro One to augment its normal operations. This is accomplished through various mechanisms, such as

- overtime and extended days;
- reprioritization of work;
- reassigning multi-skilled staff;
- relocating staff among zones;
- recruitment of additional Hiring Hall staff;
- assistance from other utilities; and
- engagement of external contractors to perform certain tasks (e.g. basic civil engineering work).

These mechanisms are already in place and will be used if and when required. Even with the augmentation to normal operations, there could be a buildup of applications or connection work orders. Hydro One's plans to manage accumulated backlogs are detailed below, in the section titled "Back-log Management".

#### Reprioritization of Work

As an overarching premise to the plan, Hydro One will prioritize work to meet the regulatory obligations but will not compromise power restoration and storm response. Therefore, priorities in descending order will be:

• emergency response and power outages

- micro-embedded generator Connections
- load Connections
- capital work program
- maintenance work program

Currently, Hydro One prioritizes load connections over micro-embedded generator connections.

The reordering of priorities will place micro-embedded generators ahead of load connections, in recognition of the more stringent requirements in the Code for generation connections (e.g. the requirement that timelines be met 100% of the time, and the inability to mutually agree to a later connection time). This reprioritization of work is expected to favorably impact compliance with both sections 6.2.6 and 6.2.7 of the Code. For application processing, Hydro One expects to complete more site assessments within the allotted time, and more micro-embedded generator connections are expected to fall within the five-day period.

Hydro One's intent in reprioritizing the above activities is to fulfill its obligations for the safe and reliable operation of the distribution system, while still complying with the Code requirements for connecting load and generation customers. The Company does, however, recognize that this may adversely impact overall performance levels for connection of load customers, perhaps causing the reported compliance to fall closer to the minimum 90% threshold stipulated in section 7 of the Code.

#### **Backlog Management**

It is Hydro One's intent that the backlog that was identified in the application and hearing and that contributed to Hydro One's reported non-compliance will be cleared during the exemption period. Furthermore, it is Hydro One's expectation that in the future, any backlogs would be encountered only due to unforeseen events or another large increase in the volume of applications (i.e. a breakdown of the Assumptions noted earlier in this Plan.)

In the event that Hydro One exceeds its normal processing capability, Hydro One has additional processing capability on which to draw, e.g. diversion of resources from other activities, overtime, etc. However, it is possible that even with such operational contingency mechanisms, a buildup of unprocessed applications and connection order will occur. To reduce the backlog, Hydro One intends to maintain the various contingency mechanisms in place. Particularly, after a storm, all work is reprioritized and repackaged. It is Hydro One's experience that compliance can be negatively impacted for two to three weeks following a storm or other widespread power restoration event.

#### RISKS AND CONTINGENCY OPTIONS

As noted above, Hydro One has put in place a number of process improvements to allow it to achieve compliance over the six-month exemption period. The Company also has access to

EB-2011-0118 Page 10 of 13

additional, operational contingency mechanisms to handle higher demand and even backlogs of applications and connection orders.

Yet, Hydro One's Plan is clearly based on certain assumptions, and especially on the expectation of a more orderly and manageable environment, with only limited instability in:

- the upstream microFIT program and customer response to it;
- volumes of applications;
- the nature of customer connection requests; and
- competition for Hydro One's attention from power restoration priorities.

Should these risks materialize, Hydro One's ability to achieve full compliance by April 11, 2011, will be at risk.

Hydro One is therefore also identifying some other options to allow it to achieve compliance. These carry additional risks and potential costs. They therefore require further development and evaluation before they could be implemented.

For example, for processing applications for connections that today require a site assessment, Hydro One might explore alternative approaches to pricing, so that an offer can be made within the 15-day timeline, but without a site visit. Such approaches may be possible where the connection is not complex in nature, and could involve developing a pricing structure that varies by connection type. The development of an appropriate pricing structure will require additional data analysis to ensure that prices are set to recover the Company's costs. Customers might be offered a 'base price' and a 'menu' listing specific, potential add-ons that may apply, depending on a site assessment that would be performed later (likely beyond the 15-day window). After that site assessment, the customer would have the option of accepting the new, firm offer from Hydro One, or revoking the customer's acceptance of the conditional offer without penalty, should the base price be exceeded.

In addition to setting a correct price (or several such prices), Hydro One recognizes that proper customer communications are necessary to explain the offer in advance and to address concerns after the fact. The customer satisfaction and financial risks associated with any such offers need to be seriously assessed prior to any implementation.

It is recognized that, the more complex the connection, the greater the potential for cost variability and unforeseen connection issues. In some cases, a site assessment simply cannot be avoided. For those cases where a site assessment is still needed, compliance can only be achieved if the project is prioritized over all work except for storms and power restoration.

These concepts and other options, need further exploration and development during the exemption period before they can be considered for implementation as part of contingency plans.

#### ITEMS NOT RELATED TO COMPLIANCE WITH 6.2.6 & 6.2.7

The table below deals with those items listed in "Appendix A – Proposed Content of Compliance Plan" of the Board's Decision and Order that are not directly related to compliance with provisions of sections 6.2.6 or 6.2.7 of the Code. These items were identified by the Board to be of benefit to Hydro One's customers.

Table 1 – Items Not Related to Compliance with 6.2.6 or 6.2.7

| Submission  | Action   | Estimated<br>Completion<br>Date |  |
|---|--|---------------------------------|--|
| <b>Customer Communications</b>  |  |                                 |  |
| Ensure customers have a clear point of contact for both the offer to connect and the refusal process.   | Single point of contact is Hydro One's Business Customer Centre (BCC). Standard wording with full contact details is already on most communications, but will be included on all correspondence.   | Dec 15, 2011                    |  |
| Customers should be informed as soon as Hydro One determines that the project is constrained and that a refusal will therefore be issued              | Customers receive an e-mail as soon as Hydro One determines that their project is constrained. For refusals, the email contains information that allows the proponent to monitor the station and feeder capacity calculator.   | Already in place                |  |
| Customers should be aware of the status of their application throughout the process.  | A review of the end-to-end application process has identified some opportunities to automatically communicate status updates to applicants. This will require modifications to existing databases, applications and processes.   | Feb 28, 2012                    |  |
| Better explain reasons for<br>system constraints on the<br>Hydro One website  | Hydro One will update the messaging on the Hydro One website with a better explanation of the reasons why system constraints occur. Additionally, Hydro One has created and will post a video that communicates the information on system constrains.  | Dec 31, 2011                    |  |
| A better alternative method to make absolutely clear to applicants that all investments made prior to an offer to connect are at the customer's risk. | Hydro One has always cautioned customers not to incur any major expenses until an offer has been granted, and will continue to do so. As noted in the hearing, this warning appears on the front page of Form C in a larger font size and bold face to emphasize its importance. To even further improve awareness, the application for a Micro-embedded Generator (Form C) has been updated to include a checkbox that the customer must fill in, indicating that the customer has read and understood the warning. | Done                            |  |

Filed: November 15, 2011 EB-2011-0118

Page 12 of 13

| Resources  |  |                    |
|--|--|--------------------|
| Documentation of the continuous communication with the OPA and stakeholder groups so Hydro One can | Hydro One continues to deal with the OPA and various stakeholder groups. For the past 12 months there has been a weekly meeting between the OPA, IESO and Hydro One.   | Analysis completed |
| get a better forecast of application volumes and need for additional resources                     | Hydro One has access to the OPA's database portal as part of the normal communication process for all distributors. Hydro One has analyzed the customer requested connection dates provided to the OPA and the actual dates of connection and has concluded that that there is little, if any, consistency between the two. Furthermore, Hydro One found that the customer proposed in-service dates on the application to Hydro One are often changed again. With the customers changing information multiple times between the OPA, the application to Hydro One and the actual in-service date, it is difficult to accurately forecast applications or connections.         |                    |
|  | Hydro One regularly communicates with stakeholders through webinars, advisory board meetings, association forums, customer meetings, industry meetings, conferences, trade shows, and festivals.   | Already in place   |
| Site Assessments   | 1  | 1                  |
| Policy for missed appointments   | Hydro One has an existing missed appointment policy that it follows. The policy is aligned with the Board's relevant service quality index.  | Already in place   |
|  | <ul> <li>When an appointment is to be missed, staff must:</li> <li>Attempt to contact the customer BEFORE the scheduled appointment to advise that the appointment will be missed.</li> <li>Attempt to contact the customer within one business day to reschedule the appointment.</li> <li>Both of these actions must be completed to fulfill this service quality requirement. This requirement does not apply if the appointment is missed due to the failure of the customer or the customer's representative to attend the appointment. The rescheduled appointment becomes a new appointment for the purposes of Appointment Scheduling and Appointments met.</li> </ul> |                    |

| <b>Technical Limits</b>     |   |              |
|-----------------------------|---|--------------|
| Provide continuous and      | Hydro One continually performs maintenance and            | Already in   |
| public reporting on system  | upgrades to its system and equipment. To communicate      | place        |
| upgrades and the results in | this, each month Hydro One's online List of Station       |              |
| terms of new offers to      | Capacity and Applications document is updated to reflect  |              |
| connect of those upgrades   | current capacity. The Station & Feeder Capacity           |              |
|                             | Calculator data is also updated to reflect the real time  |              |
|                             | revisions to capacity data.                               |              |
| Ensure applicants           | There are various reasons why a project will receive      | Dec 15, 2011 |
| understand where re-        | capacity and an Offer to Connect, including rescreening.  |              |
| screening has resulted in   | Currently, Hydro One does not give the specific reason to |              |
| new offers to connect       | the customer as to why capacity may have become           |              |
|                             | available. As of December 15, 2011, Hydro One will        |              |
|                             | require the customer to do its own rescreening and a new  |              |
|                             | application, rendering this action unnecessary.           |              |