Halton Hills HYDRO

December 20, 2011

Mr. Paul Gasparatto
Ontario Energy Board
27th Floor/ P.O. Box 2319
2300 Yonge St.
Toronto, ON M4P 1E4

Dear Mr. Gasparatto,

Re: EB-2010-0249 Initiative to Develop Electricity Distribution System Reliability

Halton Hills Hydro Inc. ("HHHI") thanks the Board for the opportunity to respond to questions posed by Board Staff in Phase 2 of proceeding EB-2010-0249, Initiative to Develop Electricity Distribution System Reliability Standards, dated November 23, 2011.

Below, please find HHHI's comments in response to the questions posed by Board Staff.

Additionally, please note that HHHI requests to participate in the proposed Reliability Data Working Group.

Any additional questions or clarifications can be directed towards Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, Halton Hills Hydro Inc., (519) 853-3700 extension 257, tracyr@haltonhillshydro.com.

Yours truly,

Tracy Rehberg-Rawlingson
Regulatory Affairs Officer
Halton Hills Hydro Inc.

Cc: Arthur A. Skidmore, President & CEO
David J. Smelsky, CFO
Don Matthews, Manager of Engineering and Operations

Ontario Energy Board Proceeding EB-2010-0249
Phase 2 – Initiative to Develop Electricity Distribution System Reliability Standards

Halton Hills Hydro Inc. ("HHHI") thanks the Board for the opportunity to respond to questions posed by Board Staff in Phase 2 of proceeding EB-2010-0249, Initiative to Develop Electricity Distribution System Reliability Standards, dated November 23, 2011.

In addition to responding to questions, HHHI requests participation in the Reliability Data Working Group. As a mid-sized distributor, HHHI is comprised of eighty-nine (89) percent rural area and eleven (11) percent urban with overhead lines equal to sixty-one (61) percent. With its unique characteristic of two urban centers surrounded by rural area, HHHI would be able to provide valuable insight to the Working Group.

HHHI agrees with the Board Staff that there needs to be a consistent, province-wide approach to recording and reporting of reliability data. With the Board's on-going Renewed Regulatory Framework initiative, HHHI believes that relevant and consistent data collection and reporting will have more impact on distributors than ever before. HHHI offers the following responses to the questions posed in the letter dated November 23, 2011:

Collecting and Reporting Reliability Data in the RRR

HHHI believes that the definition of "total number of customers served" does require further clarification. The definition does not specify if street lighting and/or sentinel lighting, should be included or excluded in the numbers. Additionally, the description of the average number of customers served in a month does not account for situations where properties are vacant, in particular, areas where student housing may see a large number of vacancies over a period of months. Defining "total number of customers served" as the total number of distributor installed meters, would, in effect, eliminate any confusion about vacant properties, un-metered scattered load, bulk metering, street lighting and sentinel lighting.

Board Staff has asked for "the most effective way to define" the start time and end time of an interruption. Ideally, automated reporting based on SCADA and smart meter data would be the most accurate method of reporting outage times. Using such methods would eliminate the need of defining a start and end time as the data would provide concise periods. However, many distributors do not currently have the ability to extract this data through an automated process, at a reasonable cost. In the absence of this automated ability, distributors should be reporting outages from the time the distributor becomes aware of the situation.

In relation to Board Staff comments on a guide of best practices, HHHI re-iterates the idea that tracking would be most accurate and consistent if automated. However, as previously stated, for those distributors that do not currently have automation the Board will need to determine if the incursion of such costs would be to the benefit of customers. HHHI believes that the Working Group will best be able to address the concept of a guide of best practices.

Normalized Reported Data and Cause of Outages

HHHI agrees with Board Staff that it is important that performance be adjusted to reflect the impact of major events and that the approach is consistent among distributors. Board Staff mentions using two common approaches, percent of customers affected or IEEE Standard 1366, to normalize data. HHHI agrees that the described flaws in both approaches are valid and the Board should consider focusing more on the cause of outages and the accuracy in the reporting of the causes. Should distributors report the causes of outages in addition to number of customers and duration, the Board could remove the causes that they consider outside the control of distributors to produce a more normalized result.

Board Staff has posed the question of the administrative burden and costs to distributors if required to report data on the causes of outages. HHHI does not feel that the burden and costs would be material as distributors already have the obligation to keep records of causes.

Customer Specific Reliability Measures

Currently, due to the nature of the distribution system, HHHI does not currently use any customer specific reliability measures.

It would be difficult for HHHI to measure "Customers Experiencing Multiple Interruptions" and "Customers Experiencing Long Duration Interruptions" without incurring increased costs to further automate the distribution system. As HHHI is fully deployed with smart meters, the customer specific outage data is available. However, the amount of data to be retrieved and organized would be quite burdensome and would be dependent on the provincial MDM/R. HHHI could report in aggregate "Customer Interruptions per km" and "Customer Hours of Interruption per km" as HHHI already reports the number and hours of interruptions in OEB RRR 2.1.4 and km of line in OEB RRR 2.1.5.

Worst Performing Circuit Measure

HHHI believes that while a "Worst Performing Circuit Measure" could be a valuable internal measure for distributors, due to the varied distribution system designs, it would be very difficult to create a metric that could be used for comparative purposes between distributors. In the absence of automated information, the collection of manual data could be onerous and inconsistent. Additionally, should the metric utilize a variable for the number of customers affected, distributors with greater rural areas (less customer density) could not be reliably compared to distributors with large amounts of urban areas.

It should also be stressed that some circuits, due to their geographical locations, could always be a "Worst Performing Circuit". In such an instance, a distributor should not be penalized for not improving the reliability when it is impossible to do so.

In conclusion, HHHI feels that the Working Group will be able to address many of the issues presented. However, the OEB should consider the current concerns over electricity costs and bill impacts when determining where, and how much, money will be spent in consideration to the benefit to customers.