



Representing Ontario's Electricity Distributors

February 13, 2012

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON - M4P 1E4

*Via web portal and by courier*

Dear Ms. Walli:

**Re: Board File No. EB-2007-0722; Proposed Electricity Reporting and Record Keeping Requirements for Distributors Related to Revised Customer Service Rules**

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies. The EDA represents the interests of 77 publicly and privately owned distributors in Ontario.

The distributors support the view that the Ontario Energy Board (OEB) should ensure it receives timely and meaningful reporting of matters that are directly relevant to its statutory responsibilities but avoid onerous reporting requirements that do not effectively support the distributors' business objectives and their customer interests.

Currently, there are an extremely high number of metrics on which distributors provide reports to the OEB, Government and other agencies. LDCs believe that they are spending a disproportionate amount of time and effort in preparing these reports. The distraction of dealing with data that does not promote the immediate and longer term goals of the utility, simply promotes inefficiency.

In order to improve efficiency of the reporting system, the EDA recommends that the OEB consider reviewing and revising the existing reporting requirements as a part of the OEB's current initiative to develop a Renewed Regulatory Framework (RRF) for electricity distributors.

As a part of RRF initiative, the OEB is planning to harmonize existing information requirements; develop new metrics to measure performance; and to enhance the qualitative and quantitative information produced by utilities. Therefore we think it is more appropriate to consider the merits of the new proposed Customer Service metrics along with revisions to the existing reporting requirements in conjunction with developing RRF.

In the process of overhauling the existing reporting requirements, the OEB could identify reporting metrics that could be eliminated without great consequence. All unnecessary reporting could be reduced based on an estimated cost/benefit assessment for the utility and its customers. Reporting metrics that may be outdated or duplicative should also be considered for elimination. In addition, the currently proposed Customer Service metrics could be examined for inclusion in the Reporting and Record Keeping Requirements (RRR) at that time. This will ensure an efficient process for distributors and the OEB, so as not to expend considerable time, effort and costs to establish RRR Customer Service metrics at this time which may later need to be reconsidered and possibly excluded in light of the RRF. We believe this approach would not unduly delay the expected implementation of the proposed RRR Customer Service metrics (i.e., January 1, 2013) since the Board anticipates to complete the development of RRF in time for 2014 distribution rate applications.

There are 29 metrics related to revised customer service rules that are being proposed to be added to the RRR. Including these 29 metrics by themselves may not appear to be onerous for utilities, but when reporting requirements resulting from several OEB consultations add up, the task of reporting becomes burdensome. In addition, the reporting requirements arising from the Government ministries and other agencies such as the IESO, OPA and Statistics Canada are also on the increase.

Distributors believe that the addition of new metrics which do not add value to either utilities or to their customers will only increase inefficiency and regulatory burden for utilities. The costs of making changes to utilities' customer information systems (CIS), when considered separately for each initiative of the OEB on an incremental basis, may not appear to be large. However, the cost of making changes to CIS to accommodate several incremental changes to RRR on a piecemeal basis adds up and may be materially significant. Recovery of these costs has also been problematic and uncertain for utilities. Additionally, making incremental changes to the CIS takes away too much time and effort of utility employees diverting their attention from operating the utility effectively and efficiently.

Additionally, the OEB might consider reducing the number of times the incremental changes are proposed to the RRR to a frequency of once every 2 years. This would enable utilities to consolidate all the necessary changes to their CIS in a more efficient manner.

The EDA thanks the OEB for the opportunity to provide comments on the proposed electricity RRR for distributors related to revised customer service rules. This submission has been prepared in consultation with EDA members.

We look forward to working with Board staff as necessary in this regard.

Yours truly,

A handwritten signature in black ink, reading "Maurice Tucci". The signature is written in a cursive, flowing style.

Maurice Tucci  
Director, Regulation & Technical Policy

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