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April 19, 2013

Ms. Kirsten Walli
Ontario Energy Board
PO Box 2319
27th Floor, 2300 Yonge Street
Toronto, Ontario M4P 1E4

Re: Consultation of Proposed Amendments to the Electricity Reporting and Record Keeping Requirements

Phase 2 – Initiative to Develop Electricity Distribution System Reliability Standards

Board File Number: EB-2010-0249

Dear Ms. Walli,

Entegrus Powerlines Inc. (“Entegrus”) appreciates the opportunity to comment on the Phase 2 “Initiative to Develop Electricity Distribution System Reliability Standards”, as detailed in the Board’s letter of March 20, 2013.

If you have any questions, please contact the undersigned.

Regards,

[Original Signed By]

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cc: Dan Charron, President – Entegrus Powerlines
Chris Cowell, Chief Financial and Regulatory Officer
Matthew Meloche, System Planning Engineer

Entegrus welcomes the opportunity to comment on the Phase 2 “Initiative to Develop Electricity Distribution System Reliability Standards”, as detailed in the Board’s letter of March 20, 2013.

The Entegrus commentary is as follows:

Improving Definitions

Entegrus has long held that standardized definitions methodologies are required in order to compare reliability statistics amongst utilities in a meaningful way. Entegrus therefore applauds the proposed amendments to match the Board’s definitions of SAIDI, SAIFI, CAIDI, Interruption and Customer to those of the Canadian Electrical Association (“CEA”) and Institute of Electrical and Electronics Engineers (“IEEE”) Standard 1366.

Further, Entegrus supports the proposal of the addition of a notification reporting requirement in instances where changes to technology, measurement or reporting practices have impacted the comparability of go forward performance data in comparison to past data.

Lastly, Entegrus agrees with the Board proposal to “clarify that outages related to Loss of Supply are those interruptions due to problems associated with assets owned and/or operated by another party, and/or the bulk electricity supply system.”

Measuring Practices

Entegrus recognizes that there is a continuum of outage technology across the Ontario industry, and that the resulting variations in measurement techniques directly impact reliability comparability amongst utilities. Specifically, it is understood that while some utilities employ complex automated outage management systems, other utilities may use manual tracking. Entegrus therefore appreciates that it is not pragmatic at this time to make RRR amendments involving the standardization of measurement practices.

However, to ensure that more commonality can ultimately be achieved, Entegrus believes that a more consistent application of technology is required. Entegrus proposes that the Board establish a minimum standard for measurement practices. It is suggested that this minimum standard could be phased in over a five to seven year period.

Normalization and Reporting on Causes of Outages

Entegrus strongly supports the proposal that utilities report outage causes under the 10 categories delineated by the Board. This information is already tracked by many utilities and, accordingly, Entegrus believes that this additional requirement will not be onerous.

Entegrus maintains its belief that reported data should be normalized for major events using IEEE standards. IEEE standards are internationally recognised and are the results of intensive research. While Entegrus agrees that IEEE contains flaws, it is noted that any standardization (or benchmarking) process will inherently contain flaws. This does not mean that standardization (or benchmarking) should not occur. IEEE is used by many American utilities, and as a result “off the shelf” outage management software is currently available with the IEEE normalization methodology

as a default. Such software could provide the basis for achieving commonality of reliability measurement, normalization and reporting across the industry on a cost effective basis.

It is the hope of Entegrus that the implementation of the outage reporting categories will establish a databank which can ultimately lead to the development of standardized major event outage reporting under a methodology akin to IEEE.

Proposal to Eliminate Certain RRR Requirements

Entegrus concurs with the proposal to eliminate CAIDI. The reporting of CAIDI is redundant, since it can be derived from existing SAIDI and SAIFI reporting.

Conversely, Entegrus advocates that MAIFI reporting continue. Whereas SAIDI and SAIFI monitor power availability, MAIFI provides a key indicator of power quality. While residential customers are experience impact from momentary outages, larger industrial customers can experience significant disruptions to their manufacturing processes as a result of momentary outages. Maintaining this metric across the province may provide valuable information in terms of system performance and mitigation opportunities. MAIFI tracking may also assist utilities in analyzing investment decisions based on power quality considerations, in cases where few sustained outages are present.

Customer Specific Measures

Entegrus agrees that customer specific reliability measures should not be introduced without further research. Entegrus believes that customer specific reporting requirements would be onerous and excessive, and could potentially result in privacy concerns depending upon how the reporting was designed. In the event that this reliability measure was pursued in the future, it is recommended that the reporting be at the feeder level and not the customer level.

Entegrus also supports that worst performing feeder reliability not be reported, given recent developments. Specifically, Entegrus notes that as utilities file Cost of Service applications, this data will be readily available in Consolidated Distribution System Plans, in accordance with the Board's new filing requirements of March 28, 2013.

Effective Date

Entegrus supports the amendments coming into effect on January 1, 2014.