

August 20, 2014

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

**Re: Staff Discussion Paper – Electricity Distribution System Reliability Measures & Targets  
Board File Number: EB-2014-0189**

Dear Ms. Walli,

Entegrus Powerlines Inc. (“Entegrus”) appreciates the opportunity to comment on the Board’s discussion paper on “Electricity Distribution System Reliability Performance Measures & Targets”, dated July 15, 2014.

Entegrus wishes to preface its comments by noting that it supports the comments of the Electricity Distributors Association. Entegrus offers the following supplementary commentary with regard to the normalization of outage reporting.

**Normalization of Outage Reporting**

The Discussion Paper notes that: *“PEG reviewed the available data from 2002 through 2012 and noted that there is too much variability and apparent randomness in Ontario distributors’ underlying SAIFI and SAIDI data...”*

The Discussion Paper further observes: *“This data variability results, at least in part, from the fact that distributors have historically not normalized their reported reliability metrics to eliminate the impact of severe storms and other random factors that can have a substantial impact on measured SAIFI and SAIDI.”*

Based on these observations, there is clearly value in establishing a standard approach by which distributors can normalize reliability indices against major storm events. Entegrus has long believed that the best normalization methodology to apply is the Institute of Electrical and Electronics Engineers (“IEEE”) Section 1366 Standard.



The IEEE 1366 Standard was originally drafted in 1998 and is now well-established internationally. The Standard is thoroughly documented and has an active oversight committee which reviews the standard and publishes periodic updates. IEEE 1366 is used by many American utilities, and as a result, “off the shelf” outage management software is currently available with this 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 rather than supporting a new and yet-to-be-defined normalization standard, the Board consider adopting the existing IEEE Section 1366 Standard for the purpose of normalizing reliability indices.

If you have any questions, please contact the undersigned.

Regards,

*[Original Signed By]*

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