

Ontario Energy Board
2300 Yonge Street, Suite 2701
Toronto, ON M4P 1E4
Attn: Ms. K. Walli
Board Secretary

August 29, 2014

Dear Ms. Walli

Re: EB-2010-0379

Please be advised that Burlington Hydro Inc. is unable to file its Management Discussion and Analysis (MD&A) on its Scorecard according to today's deadline and that, accordingly, it is also unable to provide electronic sign off. Burlington Hydro's internal review and due diligence processes are well underway and will support Burlington Hydro in providing the information that will serve both the Board's and our customers' needs for high quality, accurate and relevant information. Burlington Hydro is taking every action possible to ensure that it provides the Board with the requested materials well in advance of the planned public posting at the end of September.

Our staff are reviewing the Scorecard data and preparing the MD&A. In particular, the Regulatory Affairs department, that is leading and coordinating this effort, is experiencing an extra-ordinary workload which has included the completion of the 2014 Cost of Service Application and the filing and defense of the Z Factor Application, and is fulfilling its 'business as usual' duties with its long standing staff complement of 1.5 FTEs.

As an interim measure, Burlington Hydro provides the attached comments on the overall Scorecard and on certain elements contained within it.

Sincerely

K. Farmer Manager, Regulatory Affairs

Encl

cc Mr. G. Smallegagne, President





# 2013 Scorecard Preliminary Comments

#### Preamble

Burlington Hydro confirms that the Service Quality, System Reliability and Connection of Renewable Generation data set out on the Scorecard is consistent with its RRR submission of April 30, 2014. Please be aware that Burlington Hydro is unable to confirm:

- the Total Costs estimated by PEG's model; or
- the CDM achievements.

Burlington Hydro continues to review its 2013 data and experiences.

### Service Quality

In 2013 Burlington Hydro exceeded the OEB's minimum acceptable performance levels. This outcome was achieved using Burlington Hydro's internal resources, its long standing contractors and its business processes, systems and practices.

### Reliability

Burlington Hydro's 2013 reliability achievements data includes all outages attributable to storms, in particular the extreme weather that was experienced during the July Wind Storm and the December Ice Storm. Please note that no extreme weather events were experienced in 2012.

#### Costs

Burlington Hydro notes that the reported Costs metrics rely on the Total Costs estimated by the OEB's consultants' model. At this time Burlington Hydro is unable to confirm the model's output. Burlington Hydro notes that its costs include those incurred to staff and operate the Control Room 24 hours/day; to own, operate and maintain over 30 Stations; to provide service in both the urban and rural areas of its service territory; and to serve approximately 12,000 end users situated behind bulk meters.

## CDM

Burlington Hydro has not received the Ontario Power Authority's final report of its 2013 Conservation and Demand Management achievements.

# Financial

Burlington Hydro notes that its' reported 2013 Regulated Net Income is not weather normalized.

