



January 12, 2015

BY EMAIL/RESS/COURIER

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

Dear Ms. Walli,

RE: Board File: EB-2015-0182

Electricity Distribution System Reliability

Whitby Hydro Electric Corporation (Whitby Hydro) offers the following comments regarding the Ontario Energy Board's (OEB) *Report on Electricity Distribution System Reliability: Major Events, Reporting on Major Events and Customer Specific Measures*.

Defining a Major Event

Whitby Hydro supports creating a definition of a Major Event and reporting reliability measures so that they are normalized in order to differentiate the impact of Major Events.

The OEB has proposed a definition which requires a Major Event to be one which is beyond the control of the distributor. Whitby Hydro generally agrees with this approach however is concerned with the four characteristics that have been identified (unforeseeable; unpredictable; unpreventable; and unavoidable). It is Whitby Hydro's view that these four characteristics are subject to interpretation and as such may limit the identification and meaningful comparability of Major Events across the industry. Whitby Hydro also suggests that the definition for Major Events should include, but not be limited to those caused by natural forces or third party action.

On this basis, Whitby Hydro is supportive of the OEB's proposal to provide LDC's with different options for assessing a Major Event which follow the recommendations set out in the Canadian Electricity Association's *Major Event Determination Reference Guide* and agrees that changes in methodology should be limited to specific circumstances (which should be supported by LDC justification).

Whitby Hydro suggests that once a definition is established, it be primarily used for reliability reporting on a go forward basis. While historical information is likely available, LDCs should be able to compile it for the purpose of utilizing the IEEE method on a "best effort" basis.

Monitoring the Response to a Major Event

Whitby Hydro supports the concept of a reporting on an LDC's Response to Major Events. In general, Whitby Hydro supports the proposed questions for the time period "Prior to the Event" but notes that some of this information is already included in the LDC Emergency Preparedness Plan. Similarly Whitby Hydro feels the "After the Event" questions proposed

are generally reasonable. As available resources during a Major Event are best directed towards restoration efforts; managing customer concerns and communications, any requirements related to “During the Event” reporting should be focused on addressing items that add incremental value and do not detract from focusing staff attention on primary restoration, customer service and communication activities. As such, Whitby Hydro suggests that the “During the Event” questions be reviewed and condensed in order to ensure that only the most critical questions are required for reporting. Some examples of questions that Whitby Hydro suggests could be reviewed for further consideration (removal or modification) would include:

- Q2 - not appropriate to comment on impacts to other LDCs
- Q3 and Q6 – Whitby Hydro suggests more general information/commentary would be appropriate vs. proposed detailed and specific tracking/reporting in order to allow staff to focus on critical restoration and customer service activities
- Q4 and 7 seem duplicative
- Q5 – 6 – Whitby Hydro suggests more general information/commentary would be appropriate vs. proposed detailed and specific tracking/report in order to allow staff to focus on critical restoration and customer service activities
- Q10 -13 - LDCs’ phone systems may not fully support the detailed tracking proposed. It is more likely that LDCs can provide some valuable information with existing systems but on a modified basis. For instance, IVR systems may not be implemented or phone reporting may not be available based on specific outage time and duration, but may be available based on hourly increments. As a result it is suggested that these questions be modified to allow for some flexibility in addressing.

Whitby Hydro also suggests that a 90 days reporting timeline may be more appropriate and that reporting could be done quarterly. Whitby Hydro also believes that it should not be a requirement to make the Major Event report accessible on the OEB’s website. Communication to customers should be managed by the individual LDC.

Customer Specific Reliability Measures

Whitby Hydro supports the approach of initiating a voluntary pilot project on customer specific reliability measures. A pilot project would provide further insight into the system and resource requirements as well as related costs of reporting reliability at a customer specific level. Until the pilot project is complete, it would be premature to assess a reasonable timeline for a broader implementation.

In general, Whitby Hydro believes that some type of reporting such as “worst performing feeder” is more valuable in understanding and improving reliability on a larger scale. This may also give the OEB a better understanding of how this information may be helpful and will provide additional perspective on the cost/benefits of developing customer specific reliability reporting requirements.

Sincerely,

Original signed by

Susan Reffle
Vice-President