

**BY E- MAIL**

October 19, 2018

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, Suite 2700  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Final Submission by ERTH Power Corporation (formerly Erie Thames Powerlines Corporation) and West Coast Huron Energy Inc. for approval to amalgamate and continue operations as a single electricity distribution company**

**OEB File Number: EB-2018-0082**

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Please accept this letter as the Applicants' reply submission pursuant to the Board's Decision on Motion and Procedural Order No. 5 issued on September 19, 2018.

1. Background

*1.1 Introduction*

On March 14, 2014, ERTH Power Corporation (under its former name, Erie Thames Powerlines Corporation) ("ETPL") and West Coast Huron Energy Inc. ("WCHEI") (collectively, the "Applicants") filed an application with the Board (the "Application") requesting the proposed amalgamation of ETPL and WCHEI. In particular, the Application requested the approval of the proposed transactions effecting the amalgamation, the amendment of the ETPL Distributor Licence (ED-2002-0516) to include WCHEI's service area, the cancellation of WCHEI's Distributor Licence (ED-2002-0510), and related rate orders.

Following publication of notice of the Application, the Board granted intervenor status to Vulnerable Energy Consumers Coalition ("VECC"), Mr. James McCartney ("McCartney") and Mr. Gord Garland ("Garland") (collectively, the "Intervenors").<sup>1</sup> Interrogatories by Board Staff and Intervenors were received on June 4, 2018 and June 8, 2018, and the Applicants' interrogatory responses were filed on June 18, 2018 and July 10, 2018.

On September 19, 2018, the Board issued Procedural Order No. 5 providing an opportunity for Board Staff and the Intervenors to file submissions on the Application, and these submissions

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<sup>1</sup> Procedural Order No. 1 issued on May 22, 2018.

were received on October 5, 2018. This letter constitutes the Applicants' reply submission and its final argument with respect to this proceeding.

### *1.2 Contemporaneous Board Proceedings involving ETPL*

Since the filing of the Application, ETPL filed articles of amendment and an application with the Board (EB-2018-0220) to amend its corporate name from Erie Thames Powerlines Corporation to ERTH Power Corporation. The Board granted approval of the above name change on via a Decision and Order issued on August 30, 2018.

In addition, ETPL has reached a settlement proposal with respect to its cost-of-service application (EB-2017-0038) filed on September 15, 2017, which is intended to establish new rates effective May 1, 2018 (the "ETPL 2018 Cost-of-Service Proceeding"). Board Staff issued its submission on the settlement proposal on October 11, 2018 in which they endorsed the contents therein.

## 2. Board Staff Submissions

**Board Staff filed written submissions in which it concluded that the proposed transaction satisfies the Board's 'no harm' test.<sup>2</sup>** Board Staff also recommended additional reliability reporting which will be addressed by the Applicants in paragraph 2.3 below.

Board Staff organized its submission on the impacts of the proposed transaction into the following categories, which are consistent with the relevant regulatory principles established out in the Combined Proceeding<sup>3</sup> and the *Handbook to Electricity Distributor and Transmitter Consolidations* (the "Handbook"):

### *2.1 Application Performance against the "No Harm" Test*

**Board Staff concluded that the amalgamation proposed in the Application meets the 'no harm' test as described in the Handbook.<sup>4</sup>**

### *2.2 Impact on Price, Economic Efficiency and Cost Effectiveness*

Board staff accepted that "the amalgamation will offset the need for sizable operating and capital expenditures that will, in turn, benefit customers through reduced cost structures beginning in 2019."<sup>5</sup> **Board Staff concluded that the Application meets the requirements of the 'no harm' test from a price, economic efficiency and cost effectiveness standpoint.<sup>6</sup>**

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<sup>2</sup> Board Staff Submission, pp. 4 and 14.

<sup>3</sup> RP-2005-0018/EB-2005-0234/EB-2005-0254/EB-2005-0257

<sup>4</sup> Board Staff Submission, p. 4.

<sup>5</sup> Board Staff Submission, p. 7.

<sup>6</sup> Board Staff Submission, p. 7.

**Board Staff also supported the Applicants’ request to establish an earnings sharing mechanism (“ESM”) for years six through nine following the amalgamation.<sup>7</sup>**

### *2.3 Impact on Service Quality and Reliability*

**Board Staff concluded that the Application meets the requirements of the ‘no harm’ test from a service quality and reliability standpoint.<sup>8</sup>**

Board Staff also recommended that reliability measures should continue to be tracked and reported on by the current, pre-amalgamation service areas of WCHEI and ETPL for three years following the closing of the proposed transaction. Board Staff’s rationale for this recommendation “do not relate to the consolidation. Rather, OEB staff submits that it is necessary to have the consolidated utility continue to report reliability metrics for each of the ETPL and WCHEI service areas separately for a short time following the amalgamation in order to continue monitoring a reliability matter identified in the OEB’s 2016 Electricity Utility scorecard for ETPL.”<sup>9</sup>

Board Staff’s rationale for the above recommendation appears to be two-fold, namely their concerns regarding (i) a “systemic” decline in ETPL’s SAIDI results (as reflected in negative trending of ETPL’s SAIDI results in 2015 and 2016) and (ii) a concern about lack of visibility and reporting on reliability by specific areas serviced by the amalgamated entity (i.e. the current WCHEI and ETPL service territories.) With respect to these concerns, the Applicants submit:

- (i) Board Staff’s concern regarding a potential systemic decline in ETPL’s SAIDI results should be alleviated by the following:
  - a) ETPL’s SAIDI results improved in 2017 to 0.90, which is the 28th highest SAIDI ranking among 66 LDCs in Ontario, as reflected in the 2017 combined scorecard for electricity distributors. The Applicants also note that ETPL ranked 13th highest of 66 LDCs with respect to SAIFI. A chart summarizing the 2017 combined scorecard for electricity distributors with respect to SAIDI and SAIFI is attached to this letter as Schedule A.
  - b) The Applicants submit that ETPL discussed and identified the appropriate steps, studies and investigations required to address any reliability concerns have been addressed in the ETPL 2018 Cost-of-Service Proceeding, and the Distribution System Plan (“DSP”) submitted therewith. For example, Board Staff recently concluded that “ETPL’s historical system renewal spending was adequate to maintain safety and system reliability” but asked ETPL to “explain why ETPL is proposing to increase forecast system renewal expenditures above the expected

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<sup>7</sup> Board Staff Submission, p. 9.

<sup>8</sup> Board Staff Submission, p. 11.

<sup>9</sup> Board Staff Submission, p. 4.

rate of inflation.”<sup>10</sup> In response, ETPL explained that the capital budget request were required to maintain the reliability of its distribution grid. ETPL also referenced independent studies and investigations undertaken by METSCO Energy Solutions to develop an Asset Condition Assessment and Asset Management Plan (“ACA/AMP”) in connection with the ETPL 2018 Cost-of-Service Proceeding.

- (ii) Board Staff’s concern regarding a lack of visibility and reporting on reliability by specific areas serviced should be alleviated by fact that ETPL already tracks the reliability of each of the 14 communities that it serves, which is possible via ETPL’s recent implementation of an Outage Management System (“OMS”). The Applicants submit that this oversight and control will be extended to WCHEI once the proposed transaction is approved as WCHEI does not currently have an OMS.

Given the above, the Applicant’s respectfully submit that the Board reject Board Staff’s recommendation that reliability measures should continue to be tracked and reported on by the current, pre-amalgamation service areas of WCHEI and ETPL for three years. In addition to the Board’s stated position denying proposals related to reliability reporting at the pre-amalgamation service territory level,<sup>11</sup> the Applicant’s submit that Board Staff’s recommendation is unnecessary. ETPL and WCHEI both rank well provincially with respect to reliability (as evidenced in Schedule A) and the amalgamated entity will be tracking reliability on more granular basis (i.e. at the feeder and/or community level) than suggested by the Board (i.e. at the pre-amalgamation service territory level.) The Applicants would have no issue reporting informally on its reliability results but the Applicants do not believe that it would be able to report formally via the consolidated scorecard process as the merged LDC will only have one scorecard.

#### *2.4 Impact on Financial Viability*

**Board Staff submitted that the proposed transaction would not impact to the financial viability of the Applicants and concluded that the Application meets the requirements of the ‘no harm’ test from a financial viability standpoint.<sup>12</sup>**

### 3. VECC Submissions

VECC filed its final argument in which it concluded that, although some benefits outlined in the Application may be overstated, **the proposed transaction satisfies the Board’s ‘no harm’ test with respect to quality of service<sup>13</sup> and price, economic efficiency and cost effectiveness.<sup>14</sup>**

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<sup>10</sup> Board Staff #38 submitted in respect of the ETPL 2018 Cost-of-Service Proceeding

<sup>11</sup> Decision and Order, EB-2016-0025 and EB-2016-0360, p. 26

<sup>12</sup> Board Staff Submission, p. 13.

<sup>13</sup> VECC Submission, p.16.

<sup>14</sup> VECC Submission, p.15.

VECC did not provide a conclusion whether the proposed transaction meets the ‘no harm’ test with respect to reliability of service, which will be addressed by the Applicants in paragraph 3.2 below. **VECC also submitted the Application’s proposals with respect to the deferred rebasing period and the ESM mechanism are reasonable.**<sup>15</sup>

VECC organized its submission on the impacts of the proposed transaction into the following categories, each of which are consistent with the relevant regulatory principles:

### *3.1 “No Harm” Test - Cost/Price*

**VECC submitted that the Applicants’ projected OM&A savings appear reasonable for purposes of assessing the cost/price implication of the amalgamation.**<sup>16</sup> VECC also noted that there are additional efficiency gains that are likely to arise as a result of the amalgamation that do not appear to have been quantified and included in the projection of OM&A savings.<sup>17</sup>

VECC concluded that it is evident that the proposed amalgamation “should lead to a materially lower cost structure (and price) for the former WCHEI customers even before any of the cost efficiencies are incorporated. As a result, it is VECC’s submission that there are no issues in regards to the no-harm test (vis-à-vis price) for these customers.”<sup>18</sup> VECC submitted that the proposed amalgamation may result in small increase in the OM&A cost per customer for the former customers of ETPL but “sufficient capital savings have been documented (e.g., financial conversion savings and vehicle consolidation savings) to offset the small difference in OM&A cost per customer so as to satisfy the no-harm test (vis-à-vis price/cost) for these customers.”<sup>19</sup>

VECC raised a number of issues with the respect to the Applicants’ projected capital savings and suggested that further clarification of the basis for the capital cost savings included in the cost projections of the amalgamated utility is required.<sup>20</sup> In response, the Applicants submit the following:

- (i) The Applicants are confident that the merger will result in reduced costs for all customers by the end of the nine-year rebasing period and, pursuant to the proposed ESM, the Applicants submit that portions of these capital savings will be passed on to the customers of the merged LDC. The Applicants have attempted in good faith to be conservative in projecting OM&A and Capital savings associated with the proposed amalgamation. The Applicants submit that they were guided by a number of recent Board-approved LDC merger applications<sup>21</sup> in preparing the capital savings projections

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<sup>15</sup> VECC Submission, p.15.

<sup>16</sup> VECC Submission, p.4.

<sup>17</sup> VECC Submission, p. 4.

<sup>18</sup> VECC Submission, p. 11.

<sup>19</sup> VECC Submission, p. 13.

<sup>20</sup> VECC Submission, pp. 5-6.

<sup>21</sup> e.g. EB-2017-0212, EB-2016-0025 EB-2016-0360

contained in the Application. The Applicant submits that it has attempted to prepare capital cost saving projections in a manner consistent with these previously-approved merger applications. The Applicant notes that VECC did not intervene in any of these applications to dissect and critique the capital cost saving projections filed in those proceedings. The Applicants acknowledge that their summary of the anticipated capital savings associated with proposed merger has not been clear and some anticipated savings may be disputed. However, the Applicants submit that it is difficult to dispute the following capital savings associated with the proposed amalgamation, which total \$1,325,000:

- \$300,000 saved by WCHEI's avoiding implementing a new financial system;
- \$325,000 saved by avoiding building a new service centre in Mitchell (which is in addition to a land purchase and expenses already incurred prior to the merger which may explain VECC's confusion with respect to the savings achievable from the new service centre avoidance);
- \$700,000 saved by avoiding two large bucket or RBD truck replacements (costing approx. \$350,000 each.)

The Applicants submit that adequate capital savings can be realized to ensure benefit to the customer. The Applicants further submit that these savings are conservative and believe that more savings can be identified once ETPL and WCHEI fully merge their operations.

- (ii) Regarding the concerns raised with respect to VECC IR# 14 (a) (ii) and VECC IR #14 d), the Applicants submit that its response to VECC IR# 14 (a) (ii) incorrectly stated that the new operations centre in Mitchell was not budgeted for in the status quo. Instead, the Applicants' response to VECC IR #14 d), which states that the new service centre is included in EPTL's 2017 budget, is correct. The Applicants confirm that it has not double-counted the savings with respect to a new operations centre. The Applicants concede that the operating costs savings with respect to the operating centre in Mitchell may need to be removed from the estimated OM&A savings (which VECC submitted may be understated in any event.)
- (iii) VECC also raised issues with respect to the revenue requirements comparison set out in the Application.<sup>22</sup> The Applicants submit that they were guided by the Board-approved LDC merger applications referenced above in preparing the revenue requirements comparisons contained in the Application. The Applicant submits that its revenue calculations and comparisons are materially consistent with these previously-approved merger applications. The Applicant notes that VECC did not intervene in any of these

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<sup>22</sup> VECC Submission, p. 7-9.

applications to dissect and critique the calculations and comparison filed in those proceedings.

### 3.2 “No Harm” Test - Adequacy, Reliability and Quality of Service

**VECC concluded that the proposed transaction satisfies the ‘no harm’ test with respect to quality of service.**<sup>23</sup> VECC also noted that the Application commits the amalgamated utility to meeting (if not improving) current customer service levels in the various communities served.<sup>24</sup>

VECC concluded that the reliability experienced by WCHEI’s former customers should not decline as a result of the proposed transaction.<sup>25</sup> With respect to ETPL’s former customers, VECC identified customers in Mitchell and Dublin as a concern due to the proposed move of ETPL’s operations centre from Mitchel to Goderich.<sup>26</sup> Although it noted in its submission that the response time for these communities after the proposed transaction will remain below the Board’s mandated response time and the amalgamated utility will be able to bring to additional resources to bear when required to restore service,<sup>27</sup> VECC did not provide a conclusion as to whether the Applicants have satisfied the ‘no harm’ test with respect to reliability of service for ETPL’s former customers located in two of its 14 communities.<sup>28</sup> In response, the Applicants submit that the merged LDC will continue to focus on reliability and maintain the strong reliability results of ETPL and WCHEI, as evidenced in Schedule A. In addition, the Applicants submit that ETPL has a proven history of merging utilities, servicing non-contiguous urban rural utilities<sup>29</sup> and closing/moving service centres and reallocating resources when necessary,<sup>30</sup> while maintaining reliability and quality of service. Through these experiences, ETPL has demonstrated that the additional staffing and equipment compliment by location has proven to have no adverse effects to reliability over time. In fact, ETPL has a history of strong reliability results which was recently noted in the ETPL 2018 Cost-of-Service Proceeding.<sup>31</sup>

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<sup>23</sup> VECC Submission, p. 18.

<sup>24</sup> VECC Submission, p. 18.

<sup>25</sup> VECC Submission, p. 14.

<sup>26</sup> VECC Submission, pp. 15 and 21.

<sup>27</sup> VECC Submission, pp. 15-16.

<sup>28</sup> VECC Submission, pp. 15 and 21.

<sup>29</sup> EB-2009-0156, EB-2009-0157 and EB-2010-0386.

<sup>30</sup> e.g. closure of operations centre in Clinton associated with EB-2010-0386.

<sup>31</sup> Board Staff #38 submitted in respect of the ETPL 2018 Cost-of-Service Proceeding

### 3.3 “No Harm” Test - Other Considerations

VECC identified the expected availability of LEAP funding as an additional positive factor associated with the proposed amalgamation.<sup>32</sup> VECC concluded that the proposed transaction would have not impact on the ability of the merged entities to meet their current CDM targets.<sup>33</sup>

### 3.4 Rate Making Considerations - Deferred Rebasing Period

**VECC concluded that the rate setting proposal put forward in the Application aligns with the requirement of the Handbook.<sup>34</sup>**

### 3.5 Rate Making Considerations - Earnings Sharing Mechanism

**VECC concluded that the ESM proposed in the Application is reasonable and aligns with the requirement of the Handbook.<sup>35</sup>**

## 4. McCartney Submissions

McCartney filed final written submissions by way of email in which he submitted that the proposed transaction does not meet the ‘no harm’ test. The Applicants respectfully submit that McCartney has interpreted the ‘no harm’ test improperly and McCartney’s stated rationale for his submission is outside of the scope and the relevant regulatory principles applicable to this proceeding. McCartney organized his submission into the following categories:

### 4.1 Capital

McCartney submitted that the ETPL’s cost of capital (interest rate paid) is excessive. The Applicants respectfully submit that the ETPL’s cost of capital is not excessive and it has no impact on the financial viability of the amalgamated utility. The Applicants also note that the interest rate collectible by the amalgamated utility via rates will be limited to the amount prescribed by the Board.

McCartney also references “missing” promissory notes and a promissory note issued to ETPL from its parent corporation in 2015. The Applicants respectfully submit that it does not understand these submission and can therefore not respond.

Based on the above, the Applicants’ therefore submit that McCartney’s submissions regarding ETPL’s cost of capital have no relevance with respect to price, economic efficiency or cost effectiveness, service quality and reliability, or the financial viability of the consolidated entity. In addition the Applicants respectfully submit that they do not confirm any of McCartney’s references to specific dollar amounts in his submission.

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<sup>32</sup> VECC Submission, p. 18.

<sup>33</sup> VECC Submission, p. 18.

<sup>34</sup> VECC Submission, pp. 20 and 21.

<sup>35</sup> VECC Submission, pp. 20 and 21.



#### *4.2 Service Reliability*

McCartney submitted that the WCHEI's service reliability metrics are better than ETPL's and suggested that the amalgamated utility would close the Goderich operations centre.

The Applicants submit that the service reliability metrics for both WCHEI and ETPL are consistent with industry standards and, as indicated in Schedule A, their 2017 SAIDI and SAIFI results compare favourably against other utilities in the province. The Applicants submit that WCHEI will be serviced by additional line staff moved from ETPL's Mitchell operations centre following the proposed transaction, which should increase resourcing and reliability in Goderich.

The Applicants submit that the amalgamated utility has no plans to close the Goderich operations centre after the closing of the proposed transaction. Contrarily, the Goderich operations centre will serve a critical function as the merged utility's northern service hub.

#### *4.3 Non-Contiguous Service Area*

McCartney raised concerns regarding the non-contiguous nature of ETPL's current service territory and suggests that this may impact the reliability of former WCHEI customers in Goderich. The Applicants submit that the reliability of the former WCHEI customers will remain unchanged (and potentially improve) due to the new resources being moved to Goderich from Mitchell. The Applicants also submit that ETPL's 2017 SAIDI and SAIFI results (as reflected in Schedule A) are higher than many contiguous utilities in Ontario.

### 5. Garland Submissions

Garland filed final written submissions by way of email in which he submitted that the proposed transaction does not meet the 'no harm' test. The Applicants respectfully submit that Garland has interpreted the 'no harm' test improperly and Garland's stated rationale for his submission is outside of the scope and the relevant regulatory principles applicable to this proceeding. Garland organized his submission into the following categories:

#### *5.1 Value of the Transaction*

Garland made a number of submissions regarding valuation reports and the value of the amalgamated utility's parent company, EARTH Corporation ("EARTH") and Goderich's ownership in EARTH after the proposed amalgamation of WCHEI and ETPL.<sup>36</sup> The Applicant respectfully submit that the Board ruled on these matters in its Decision on Motion and Procedural Order No. 5 issued on September 19, 2018 and no further submissions on these matters are required.

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<sup>36</sup> Garland Submission, pp. 1-4.

## 5.2 Cost of Capital

Garland submitted that the ETPL's cost of capital (interest rate paid) is excessive that it would result in higher hydro rates for former WCHEI customers.<sup>37</sup> The Applicants respectfully submit that the ETPL's cost of capital is not excessive and it has no impact with respect to price, economic efficiency or cost effectiveness, service quality and reliability, or the financial viability of the consolidated entity. The Applicants also note that the interest rate collectible by the amalgamated utility via rates will be limited to the amount prescribed by the Board.

## 5.3 Assessment of Harm

Garland made a number of submission regarding an assessment of harm associated with the proposed transaction.<sup>38</sup> The Applicants' submit that Garland's submissions in this section are not consistent with the 'no harm' test set out in the Combined Proceeding and the Handbook and, as such, they are outside of the scope of this proceeding.

## *5.4 Summary*

In summary, Garland states that the proposed merger is a bad investment for the Town of Goderich due to a number of factors.<sup>39</sup> The Applicants submit that they do not agree with Garland's submission but, in any event, they are outside the scope of this proceeding.

## *5.5 Request of the Board*

Garland also requested that the Board direct the Town of Goderich to reconsider the proposed transaction. The Applicants' submit that the suggestion that the Board mandate the Town of Goderich to take certain actions is grossly outside the Board's scope in this proceeding and others.<sup>40</sup> In addition, the Applicants submit that such a direction to Goderich, if issued and followed, would result in Goderich breaching the terms of the share purchase agreement executed which states that the proposed amalgamation will close once Board approval is received.

## 6. Conclusion and Summary

For the reasons provided in the Application and pre-filed evidence, and confirmed by Board Staff in its submissions, the Applicants respectfully submit that the proposed transaction satisfies the Board's 'no harm' test and should be approved and, specifically, the following relief should be granted:

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<sup>37</sup> Garland Submission, p. 4.

<sup>38</sup> Garland Submission, pp. 4-5.

<sup>39</sup> Garland Submission, pp. 5-6.

<sup>40</sup> Garland Submission, p. 6.

- (1) The acquisition by ETPL's parent company (ERTH Corporation) of all shares of WCHEI pursuant to section 86(2)(a) of the *Ontario Energy Board Act, 1998* (the "OEB Act");
- (2) Leave for WCHEI and ETPL to amalgamate and continue as a corporation, pursuant to Section 86(1)(c) of the OEB Act;
- (3) Leave for WCHEI to transfer its distribution systems to ETPL pursuant to Section 86(1)(a) of the OEB Act;
- (4) Leave for WCHEI to transfer its distribution licenses and rate orders to ETPL, pursuant to Section 18 of the OEB Act;
- (5) The amendment of the distribution licence for ETPL under Section 18 of the OEB Act to include the service area of WCHEI no later than 120 days after the approval of this Application (to be followed immediately by the cancellation of the distribution licence of WCHEI);
- (6) The ability to continue to track costs to the regulatory asset accounts currently approved by the Board for each of ETPL and WCHEI and to seek disposition of their balances at a future date; and
- (7) Such necessary rate orders to transfer the existing WCHEI rate orders to ETPL.

The Applicants respectfully request that the Board issue a decision on the above matters as soon as possible. If possible, the parties wish to close the proposed transaction before the end of 2018 which would avoid the preparation of stub year-end financial statements, tax returns and other costs.

An electronic version of this letter is being filed through the Board's RESS portal. The requisite number of paper copies will follow by mail.

Yours truly,

*[Original Signed]*

Graig Pettit  
Vice-President & General Manager  
ERTH Power Corporation  
formerly Erie Thames Powerlines Corporation

Encls.

cc: Board Staff and All Intervenors  
Larry McCabe, President, West Coast Huron Energy Inc.  
Tyler Moore, Legal Counsel to the Parties

## Appendix A

		2017			2017
Rank	Utility	SAIDI	Rank	Utility	SAIDI
1	Hydro 2000	0.00	34	Burlington	1.04
2	COOP Embrun	0.09	35	Veridian	1.07
3	Wellington North	0.10	36	Ottawa	1.11
4	For Frances	0.12	37	North Bay	1.11
5	Centre Wellington	0.13	38	Tillsonburg	1.14
6	Midland	0.18	39	Westario	1.20
7	WCHE	0.23	40	Grimsby	1.20
8	Brantford	0.29	41	Bluewater	1.31
9	Lakefront	0.32	42	Niagara	1.37
10	Orangeville	0.32	43	Sious Lookout	1.38
11	Espanola	0.35	44	Kingston	1.40
12	Guelph	0.37	45	PUC	1.43
13	Newmarket	0.42	46	Lakeland	1.46
14	Renfrew	0.44	47	Collus	1.51
15	RSL	0.45	48	Energy +	1.53
16	Wasaga	0.45	49	Innpower	1.54
17	St. Thomas	0.47	50	Peterborough	1.60
18	Oakville	0.50	51	Thunderbay	1.63
19	NOTL	0.50	52	Halton Hills	1.65
20	Milton	0.61	53	Sudbury	1.65
21	ELK	0.63	54	Festival	1.69
22	Whitby	0.69	55	Entegrus	1.72
23	Enwind	0.72	56	Welland	1.83
24	Oshawa	0.73	57	Atikokan	2.74
25	Waterloo	0.76	58	CNP	3.11
26	Essex	0.83	59	NOW	3.43
27	Alectra	0.83	60	Orillia	3.63
28	ERTH Power	0.90	61	Kenora	3.84
29	Toronto	0.91	62	Hawkesbury	4.13
30	Kitchener	0.92	63	Hearst	4.33
31	London	0.93	64	HONI remote	7.55
32	Chapleau	0.94	65	Algoma	7.68
33	Ottawa	0.95	66	HONI	7.95
				<b>Average</b>	<b>1.49</b>

		2017			2017
Rank	Utility	SAIFI	Rank	Utility	SAIFI
1	Hydro 2000	0.00	34	London	1.00
2	COOP Embrun	0.01	35	Kitchener	1.03
3	Centre Wellington	0.08	36	Guelph	1.04
4	Espanola	0.10	37	Innpower	1.05
5	Midland	0.14	38	Brantford	1.07
6	Wellington North	0.16	39	Veridian	1.07
7	Lakefront	0.17	40	Kingston	1.07
8	For Frances	0.18	41	Entegrus	1.07
9	Renfrew	0.19	42	Tillsonburg	1.10
10	ELK	0.21	43	Alectra	1.12
11	Westario	0.26	44	Halton Hills	1.13
12	RSL	0.29	45	Toronto	1.18
13	ERTH Power	0.35	46	PUC	1.21
14	Orangeville	0.45	47	Whitby	1.23
15	Wasaga	0.46	48	Sious Lookout	1.26
16	WCHE	0.47	49	Sudbury	1.34
17	Milton	0.49	50	Waterloo	1.50
18	Newmarket	0.54	51	Hawkesbury	1.53
19	Essex	0.57	52	Niagara	1.55
20	St. Thomas	0.58	53	Welland	1.56
21	Ottawa	0.62	54	NOW	1.56
22	Burlington	0.64	55	Enwind	1.70
23	Chapleau	0.69	56	Hearst	1.77
24	Ottawa	0.73	57	Kenora	1.88
25	Oakville	0.79	58	Festival	1.92
26	Lakeland	0.83	59	CNP	2.04
27	Collus	0.84	60	Energy +	2.18
28	NOTL	0.88	61	HONI	2.32
29	Orillia	0.92	62	Peterborough	2.36
30	North Bay	0.94	63	Atikokan	2.39
31	Bluewater	0.96	64	Thunderbay	3.05
32	Oshawa	0.98	65	Algoma	3.95
33	Grimsby	0.99	66	HONI remote	3.98
				<b>Average</b>	<b>1.09</b>