Waterloo North Hydro Inc. – Comments on OEB Staff Discussion Paper
July 4, 2008

General notes:

1. The suggested NEV thresholds are too low. While low limits may be used in other jurisdictions, these limits are too low based on past experience with complaints and remedies in Ontario. (See Issue 2 below)

2. A clear delineation between the LDC's and the customer's responsibility needs to be established. This is required to prevent customers or consultants from expecting the LDC to resolve all on site stray voltage issues. The LDC is responsible for the LDC owned power distribution system only and this is where the focus for measuring and remedying the problem should remain.

3. Limits to the total amount of work required by LDCs to resolve specific NEV issues are needed. Specific cases may arise where threshold voltages are not attainable with reasonable amounts of remediation work by the LDC or the customer.

4. Exceptions need to be made where high NEV customers exist with no impact. LDC's should only be required to respond and remedy a high NEV complaint upon initiation and request by the customer.

Issue 1 - Service quality measure:

Target Variable – Option 1 (NEV on distribution system at farm) is recommended as this is readily measurable by LDC staff.

Remediation target indicators – Option a) (target primary NEV) is recommended and this is what LDCs have some control over.

Issue 2 – Numerical value:

Neither option is recommended as these numerical values are too low. Past experience in Ontario has led to some utilities adopting a 10V NEV threshold allowing them to successfully deal with stray voltage issues. If we must recommend a lower value, then 5V of distribution NEV (a) should be the more reasonable threshold to be more consistent with previous experience with issues specific to Ontario. Setting the value too low may overwhelm us with unjustified complaints.

Issue 3 – Cow based thresholds:

Option a) (one numerical threshold to all livestock farms) is recommended for simplicity's sake and also due to the fact that the majority of identified issues are with dairy farms.

Issue 4 – Details of investigation procedures:

Option b) (specific OEB approved procedure) is recommended for standardization and consistency across the province.

Issue 5 – Distributors responsible for identifying on-farm sources of stray voltage

Neither option here applies – The only thing a distributor can realistically do is measure the NEV at the main service or transformer. Whether or not stray voltage exists is not something LDC's are or should be equipped to do. Currently, we rely on the customer to tell us that a stray voltage problem exists and we respond appropriately.

Issue 6 – Stray voltage investigator training

Option a) (training recommended but not required) is recommended as this provides the greatest flexibility to the LDC's and minimizes the training impact on the rates.

Issue 7 – Minimum training standards

Option a) (recommended standards) is recommended for the same reasons as Issue 6 above.

Issue 8 – Investigator certification

Option a) (recommend certification) is recommended for the same reason as Issue 6 above.

Issue 9 – Customer response procedure

Option b) (prescribed procedure) is recommended to allow for the greatest standardization and consistency among LDCs.

Issue 10 – Record Keeping

Option a) (specify information types to be available to the OEB on request) is recommended to reduce the amount of work by the LDC and OEB with respect to filing.

Issue 11 – Distributor discretion over remediation methods

Option a) (require that distributors determine the safest, etc remedy) is recommended as it provides for the most flexibility.

Issue 12 – Distributor's responsibilities for providing information to farm customers

Option a) (require that distributors provide access to information on FSV and dispute resolution) is recommended here again to reduce the amount of ongoing unnecessary work by the LDC.