Registrar
Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

December 15, 2021

Attention Registrar,

Re: Reliability and Power Quality Review
Ontario Energy Board File Number: EB-2021-0307

Burlington Hydro Inc. (BHI) is submitting its responses to the set of questions provided in Appendix A of the Ontario Energy Board's ("OEB") letter *Reliability and Power Quality Review*, dated November 30th, 2021.

Yours truly,

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Attachments

Appendix A – Questions for Stakeholders' Consideration

Utility Accountability

- *OEB staff's assessment of distributors' reported data suggests that there may be a significant gap in reporting between transmitters, host distributors and embedded distributors in terms of delivery point/loss of supply outages. Outages reported under loss of supply and major events account for more than 50% of the total number of outages in the province. What type of improvements to transmission and/or distribution reporting and/or performance expectations should be considered to increase utilities' responsibilities for loss of supply events? What are stakeholders' views on the appropriate form of incentives to drive reliability performance?*
- No comment – Burlington Hydro Inc. (BHI) is not a host or embedded distributor.

- *OEB staff's assessment of reported Major Events suggests that distributors have very different interpretations of what constitutes a "Major Event", which affects overall reliability performance scores. Should the OEB revise its Major Event reporting requirements to achieve a common understanding among distributors regarding the type of outages and events that should be reported under the Major Event category? Should the OEB review the effectiveness of outage restorations?*
- It would be helpful to have more details on where the OEB is seeing these "very different interpretations" (e.g. In assessing whether a substantial number of customers were affected? Whether it was beyond the control of the distributor?).
- BHI uses the IEEE Standard 1366 approach to identifying a Major Event – this is an internationally recognized standard and BHI sees no reason to deviate from this methodology.
- The effectiveness of an LDC's outage restoration is reflected in System Reliability Indicators like SAIDI and SAIFI. The effectiveness of an LDC's outage restoration during Major Events is reflected in the MED reports. Any requirement to track and report on additional data associated with restoration efforts will have a cost associated with it (e.g. changes to outage management system, trouble reports, etc.).

- *OEB staff's assessment of historical outage data has also suggested that there are inconsistent approaches between distributors in terms of reporting outages (e.g., different interpretations between "Adverse Weather" and "Tree Contacts" defined in RRR). What is the best approach to ensure consistent outage cause reporting across the sector?*
- More clarity on identifying the primary cause of an outage (including examples where multiple cause codes apply) would be helpful.

Monitor Utility Performance

- *The current performance evaluation (i.e., service area level SAIFI & SAIDI) does not support benchmarking across the industry due to the different characteristic of each utility (such as size and locations). What would be required to ensure successful distributor reliability benchmarking across the sector?*
- The OEB should carefully consider whether benchmarking reliability across the industry is appropriate at all before they ask what changes would be required to do this. The cost and customer expectations regarding acceptable levels of reliability differ across service territories. BHI engages with its customers to understand their reliability needs and preferences, which in turn informs its asset management strategy and investment plans. BHI suggests that strong performance in this area should be measured by how well the LDC meets the reliability expectations of its customers (many of whom express they do not want to pay the required cost for improved reliability). BHI would also suggest that its customers base their reliability expectations off of past experience, not reliability performance in other service territories.

- *Power quality and momentary outages can have a significant impact on customers. The OEB has seen an increase in customer concerns regarding these issues. Should the OEB establish reporting requirements to monitor utility performance in relation to momentary outages and power quality issues? What type of power quality issues should be and can be reported and monitored?*
- No, the OEB should not establish reporting requirements to monitor utility performance in relation to momentary outages and power quality (PQ) issues, for the following reasons:
    - Momentary outages can be a function of the LDC's protection and control schemes (may have higher number of momentary outages to reduce the number of sustained outages), so it is difficult to draw conclusions from results alone.
    - PQ issues are difficult to monitor and track. Most PQ issues are identified by the customer, and many of them are on the customer's side of the meter. BHI works directly with customers to resolve PQ issues (part power, flickering light, voltage issues) on the LDC side of the demarcation point.

- BHI has some tracking in place for momentary outages and PQ issues, but most of the processes are manual and would require further investment.

Customer Specific Reliability

- *Given customers' expectations are changing because of an increasing reliance on a reliable system, should the OEB develop customer-focused reliability measures that can provide greater transparency on the level of service individual customers are receiving? Along with creating customer-focused reliability standards, should the OEB consider consequences when reliability performance expectations are not met? (e.g., customer compensation when reliability falls below acceptable level)?*
- Per the working group comments from the Board's review of reliability metrics from 2015 (EB-2015-0182), "the key to tracking individual customer outages is an effective Connectivity Model and keeping that model up-to date. (e.g. - this includes every time load is switched from one feeder to another.) Smart meters are not required, but distributors do need at least a GIS system to track whether a customer is affected by an outage. Keeping the Connectivity Model up-to date requires established processes and staff dedicated to the task. This dedication of resources and technology will cost money."
- BHI does not currently have a real-time connectivity model, nor the established processes or staff dedicated to maintaining one. As such, BHI does not have the capability to report on customer specific reliability.
- Different customers will have different reliability expectations – it is not possible for an LDC to deliver tailored reliability to each of its customers.
- BHI already has information on its customers' reliability needs and expectations from its customer engagement efforts. BHI has built its DSP, asset management strategy and investment plan around that feedback and is committed to delivering on that plan.
- The OEB must consider the unintended consequences of penalizing LDCs for isolated reliability events, as it may result in investment decisions to avoid penalties instead of decisions that have the greatest benefit to the system (and customers) as a whole.
- How will the "acceptable level" be defined / calculated?
- When the OEB surveys customers on this proposal, the survey should be very transparent in terms of the cost of implementing customer-specific reliability measures.
- BHI has an understanding of underperforming areas of its service territory and already looks for opportunities to cost effectively address those areas where and when it makes sense (and in alignment with their asset management strategy). E.g. worst performing feeder analysis.

Utility Planning

- *How should reliability data be enhanced to support effective utility planning and rate setting? Are there any established methodologies to quantify the value, from a reliability perspective, added by transmission and/or distribution investments?*
- This should be LDC specific depending on customer preferences and system renewal plans.
- BHI committed to reporting on system reliability indicators specifically related to defective equipment (SAIDI, SAIFI, customer hours of interruption) in its last Cost of Service application.