
Electrical Distribution Safety

January 14, 2022

Ms. Nancy Marconi
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 26th Floor Toronto, ON M4P 1E4

Dear Ms. Marconi

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

In its letter of November 30, 2021, the Ontario Energy Board (OEB) announced that it was launching a comprehensive review of reliability and power quality in the Ontario electricity sector. In that letter, the OEB asked for input from stakeholders on the issues that should be addressed as part of the review and the approach that should be taken to address those issues.

To assist stakeholders in providing input to the Reliability and Power Quality Review (RPQR), the OEB provided a set of questions relating to specific issues. The Electrical Safety Authority (ESA) would like to highlight one recent development, as a response to one of the questions. The response has been provided as Appendix A to this letter.

ESA appreciates the opportunity to provide its input to the RPQR and looks forward to participating in the RPQR consultations.

Electrical Distribution Safety

**Reliability and Power Quality Review – EB-2021-0307
Appendix A**

Customer Specific Reliability

3. 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?
 - a. ESA will take the opportunity to highlight that the first edition of the National Standard on Maintenance is expected to be reach publication by September 2022. C22.3 No.11, entitled "Maintenance of Electrical and Communication Utility Equipment and Systems", has a scope that includes Generation, Transmission, Stations, Distribution and Communications. Under the Reliability and Power Quality Review it should be discussed if the Electrical Distributors migrate from the DSC's Appendix C "Minimum Inspection Requirements" to the CSA standard C22.3 No.11. The Regulators and Distribution Companies should meet to discuss the standard and if it is agreed to migrate to the new standard what that parameters are established to accomplish the transition.

Note 1: That ESA under Regulation 22/04 will be addressing the possibility of migrating from the DSC's Appendix C to C22.3 No.11, with Stakeholders. In order to promote harmonization of requirements, ESA is proposing that the OEB, Distribution Companies and ESA jointly engage in a working group to address the new standard.

Note 2: ESA believes that maintenance is an essential element to a reliable system, hence any change to the maintenance systems & requirements can have a significant effect on reliability.

ESA appreciates the opportunity to provide its comment for the OEB's consideration. Should you have any questions, please do not hesitate to contact the undersigned.

Regards,



Jason Hrycyshyn
Program Coordinator – Regulation 22/04
Electrical Safety Authority