Burlington hydro inc.

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

December 16, 2022

Dear Ms. Marconi,

Re: Burlington Hydro Inc.
2023 IRM Application for Electricity Distribution Rates (EB-2022-0018)

Burlington Hydro Inc. ("BHI") submits its responses to interrogatory questions in proceeding EB-2022-0018 in accordance with the Ontario Energy Board's ("Board's") Procedural Order ("PO") No. 1 issued on November 18, 2022.

The submission contains BHI's responses to Interrogatories from Board Staff, Vulnerable Energy Consumers' Coalition ("VECC") and Small Business Utility Alliance ("SBUA").

BHI also provides updated live versions of the following models:

- Attachment 1_2023 IRM Model_BHI_12162022
- Attachment 2_2023 GA Analysis Workform_BHI_12162022

BHI confirms that the responses do not include any personal information, as identified in the certification requirements for personal information in Chapter 1 of the filing requirements.

The submission and supporting materials are being filed through Board's RESS system.

Yours truly,

Adam Pappas
Director, Regulatory Affairs, Supply Chain & Capital Planning
Email: apappas@burlingtonhydro.com
Tel: 905-332-2341

Attachments

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Staff-1

Ref: Rate Generator Model, Tab 16, 17 and 20ts

OEB staff has updated Burlington Hydro's IRM model for the following items:

1. Updated Price Escalator to 3.70% (Sheet 16)
2. Updated Smart Meter Entity Charge of $0.42, effective January 1, 2023 (Sheet 17)
3. Updated Time-of-Use Pricing to November 1, 2022 rates
4. Updated Ontario Electricity Rebate to 11.7% (Sheet 20)

Question:

a) Please confirm that the model attached to these interrogatories reflects these updates.

Response:

a) BHI confirms that the model attached to these interrogatories reflects these updates. BHI has made further updates to the IRM model, as identified in Staff-3 a) and Staff-4 a) and b). The updated IRM model is filed as Attachment 1_2023 IRM Model_BHI_12162022 to these interrogatory responses.

Staff-2

Ref 1: EB-2021-0010, Decision and Rate Order, Pages 9 & 10
Ref 2: Manager's Summary, Pages 12 & 24

Reference 1 states the following:

> The OEB accepts Burlington Hydro's proposal to dispose of balances on an interim basis, given that the implementation of new processes with its CIS is still underway, which may subsequently affect the balances being disposed. The OEB also notes and accepts Burlington Hydro's commitment to make further improvements in 2022 to align its processes with the OEB's Accounting Guidance. The OEB anticipates that, as part of its application for 2023 rates, Burlington Hydro will be in a position to seek finalization of all Group 1 balances (2017 to 2020) that currently remain disposed on an interim basis.

Based on Reference 2, it appears that Burlington Hydro has implemented the required changes to the accounting guidance in Q1 of 2022.

Questions:

a) Please explain why Burlington Hydro still seeks the disposal of Group 1 deferral and variance accounts on an interim basis in this application.

b) Please confirm the implementation of the CIS and related alignment with the Accounting Guidance has not resulted in adjustments to past balances. If not confirmed, please explain the nature of the adjustments, indicate when the adjustments were made, and quantify the adjustments.

c) Please confirm that upon implementation of the CIS and related alignment with the Accounting Guidance, Burlington Hydro is in compliance with the Accounting guidance. If not, please explain.

Responses:

a) BHI revises its request and is seeking Board approval to dispose of the balances of Group 1 deferral and variance accounts on a final basis as at December 31, 2021, including interest to April 30, 2023.

b) BHI confirms the implementation of the CIS and related alignment with the Accounting Guidance has not resulted in adjustments to past balances.

c) BHI confirms that upon implementation of the CIS and related alignment with the Accounting Guidance, it is in compliance with the Accounting guidance.

Staff-3

Ref 1: 2023 GA Analysis Workform
Ref 2: Rate Generator Model, Tab 3 – DVA Continuity Schedule

For Accounts 1589 and 1588, the variance between RRR vs. 2021 Balance (column BW) in the DVA Continuity Schedule typically equals the reversed sign of "Total Current Year Principal Adjustments" in the principal adjustment tab of the GA Analysis Workform as principal adjustments are typically timing differences that will reverse.

OEB staff prepared a table below showing the difference between the two items noted above.

	Account 1589	**Account 1588**
GA Analysis Workform - Principal Adjustment Tab	117,709	(128,463)
DVA Continuity Schedule - column BW	0	0
Difference	117,709	(128,463)

Question:

a) Please reconcile and explain the difference between the Current Year Principal Adjustments shown in the GA Analysis Workform to the variance between the RRR vs. 2021 Balance in the DVA Continuity Schedule. Please revise the evidence as necessary.

Response:

a) BHI has revised the 2023 GA Analysis Workform and Tab "3. Continuity Schedule" of the IRM Rate Generator Model to reflect no Principal Adjustments in 2021. The revised models have been included as Attachment 1_2023 IRM Model_BHI_12162022 and Attachment 2_2023 GA Analysis Workform_BHI_12162022.

There is no longer a difference between the Current Year Principal Adjustments shown in the GA Analysis Workform and the variance between the RRR vs 2021 Balance in the DVA Continuity Schedule.

Staff-4

Ref 1: EB-2021-0010, Decision and Rate Order, Page 10
Ref 2: GA Analysis Form, Tabs GA 2021 & Principal Adjustments

Reference 1 states that:

> Burlington Hydro states that the corrections to Accounts 1588 and 1589 were driven by a change in the RPP and non-RPP consumption used for calculating the IESO RPP vs. Market Price Claim for the months of October, November, and December 2020.

Reference 2 states that:

- In Tab GA 2021, $117,709 (Cell C76) is due to "True-up of Aug-Sep, 2020 from new CIS billing system not captured in 2020 DVA balances."
- In Tab Principal Adjustment, $117,709 for Account 1589 (Cell J54), $(117,709) and $(10,754) for Account 1588 (Cell V54, V55) are 2021 principal adjustments that are recorded in the 2021 general ledger

a) Regarding Account 1588, please confirm that the $(117k) and $(11k) noted in Ref 2 Tab Principal Adjustments (Cells V54, V55) were identified and recorded in the 2021 GL.
   i. If confirmed, please also confirm that the $(117K) and $(11K) adjustments were not included in the 2021 "Transaction debit/(credit) during 2021" of $(858,893) on the DVA continuity schedule for Account 1588.
   ii. If not confirmed, please explain and update the evidence as applicable to avoid duplication of the adjustment

b) Regarding Account 1589, please confirm that the $117K noted in Ref 2 Tab Principal Adjustment (Cell J54) was identified and recorded in the 2021 GL.
   i. If confirmed, please also confirm that the $117k adjustment was not included in the "2021 Transaction debit/(credit) during 2021" of $(1,226,944) on the DVA continuity schedule for Account 1589.
   ii. If part i is confirmed and the $(1,226,944) excludes the $117K adjustment pertaining to 2020 activity, please explain why $117K was identified as a reconciling item as noted in Ref 2 Tab GA 2021 (Cell C76). Please revise the evidence as necessary.
   iii. If b or bi above are not confirmed, please explain and update the evidence as applicable to avoid duplication of the adjustment.

c) In 2020, Burlington Hydro reassessed Oct. to December 2020 RPP settlements and made corresponding adjustments to Accounts 1588 and 1589. In 2021, it appears that Burlington Hydro reassessed August and Sept. 2020 RPP settlements and made

corresponding adjustments to Accounts 1588 and 1589. Please indicate the period in which Burlington Hydro has the data to reassess RPP settlements and make principal adjustments for it

i. If it is prior to August 2020, please confirm whether Burlington Hydro will be going back any further to reassess RPP settlements and make similar types of principal adjustments.
ii. If Burlington Hydro has the data prior to August 2020 and is not planning on reassessing RPP settlements, please explain why not.
iii. If Burlington Hydro has the data prior to August 2020 and is planning on reassessing RPP settlements, please explain Burlington Hydro's plans for the reassessment and any resulting principal adjustments.

Responses:

a) BHI confirms that the $(117k) and $(11k) noted in Ref 2 Tab Principal Adjustments (Cells V54, V55) were identified and recorded in the 2021 GL.
   i. BHI confirms that the $(117k) and $(11k) adjustments were not included in the 2021 "Transactions debit/(credit) during 2021" of $(858,893) on the DVA continuity schedule for Account 1588 as originally filed. BHI has revised Tab "3. Continuity Schedule" of Attachment 1_2023 IRM Model_BHI_12162022 to now include the $(117k) and $(11k) in the "2021 Transaction debit/(credit) during 2021" column for a total amount of $(987,356). BHI has also revised the 2023 GA Analysis Workform, filed as Attachment 2_2023 GA Analysis Workform_BHI_12162022, to reflect no Principal Adjustments in 2021.

b) BHI confirms that the $117K noted in Ref 2 Tab Principal Adjustment (Cell J54) was identified and recorded in the 2021 GL.
   i. BHI confirms the $117k was not included in the "2021 Transaction debit/(credit) during 2021" of $(1,226,944) on the DVA continuity schedule for Account 1589 as originally filed. BHI has revised Tab "3. Continuity Schedule" of Attachment 1_2023 IRM Model_BHI_12162022 to now include the $117k in the "2021 Transaction debit/(credit) during 2021" column for a total amount of $(1,109,235). BHI has also revised the 2023 GA Analysis Workform, filed as Attachment 2_2023 GA Analysis Workform_BHI_12162022, to reflect no Principal Adjustments in 2021.
   ii. BHI has revised Tab "3. Continuity Schedule" of Attachment 1_2023 IRM Model_BHI_12162022 to now include the $117k in the "2021 Transaction debit/(credit) during 2021" column for a total amount of $(1,109,235) and left the $117k as a reconciling item as noted in Ref 2 Tab GA 2021 (Cell C76) of Attachment 2_2023 GA Analysis Workform_BHI_12162022.

c) BHI has the data back to August 1, 2020, to reassess RPP settlements and make principal adjustments. It does not have data prior to August 1, 2020.

Staff-5

Ref 1: GA Analysis Form, Tab Principal Adjustments

Reference 1 states:

- For Account 1589, $34,335 in Tab Principal Adjustments (Cell J28) is due to "CT 148 true-up of GA Charges based on actual Non-RPP volumes" and it is "balance reported to OEB in 2.1.7 Trial Balance for 2020 in RRR revision Oct/21 and disposed of in 2022 IRM".
- For Account 1588, $(34,335) and $(387,760) in Tab Principal Adjustments (Cells V19 and V20) is due to "CT 148 true-up of GA Charges based on actual RPP volumes" and "CT 1142/142 true-up based on actuals", respectively. It is also noted that balance reported to OEB in 2.1.7 Trial Balance for 2020 in RRR revision Oct/21 and disposed of in 2022 IRM".

a) Please confirm that statement "balance reported to OEB in 2.1.7 Trial Balance for 2020 in RRR revision Oct/21 and disposed of in 2022 IRM" is to mean that the noted true-ups adjustments pertaining to 2020 were included in the 2020 RRR and general ledger upon revision in October 2021.

b) Please also confirm that the transactions of $(858,893) for Account 1588 and $(1,226,944) for Account 1589 in the DVA Continuity Schedule excludes the 2020 true-up adjustments, and the transactions only pertain to 2021 activity.

c) If part a or b above are not confirmed, please elaborate further on why the noted 2020 principal adjustments for Accounts 1588 and 1589 do not need to be reversed in 2021.

Responses:

a) BHI confirms the statement "balance reported to OEB in 2.1.7 Trial Balance for 2020 in RRR revision Oct/21 and disposed of in 2022 IRM" is to mean that the noted true-ups adjustments pertaining to 2020 were included in the 2020 RRR and general ledger upon revision in October 2021.

b) BHI confirms that the transactions, as revised in the evidence in BHI's response to Staff-3 a), for Account 1588 and Account 1589 in the DVA Continuity Schedule exclude the 2020 true-up adjustments as noted above in part a).

c) Part a) and b) above are confirmed.

Staff-6

Ref 1: Manager's Summary, p.37
Ref 2: OEB's Decision and Rate Order (EB-2018-0021), p.13

In Reference 1, Burlington Hydro stated that it has several strategies for mitigating the impact of extreme weather events, however it could not have foreseen, planned or budgeted for the storm experienced on May 21.

In the OEB's Decision and Rate Order for Burlington Hydro's Z-factor claim for the windstorm that occurred in May 2018 (Reference 2), the OEB stated the following:

> As this is the second z-factor claim by Burlington Hydro within five years, the OEB needs assurance that the distributor is updating its risk assessment and planning accordingly, given the weather in its service area.
>
> Questions:

a) Has Burlington Hydro taken any steps since the May 2018 windstorm to improve its risk assessment and planning in light of increasing extreme weather events? If so, please describe the updates made to its risk assessment and planning. If not, please explain why not.

b) Please provide Burlington Hydro's annual budgeted and actual amounts for capital expenditures and OM&A related to emergency response for the period 2017 to present.

Responses:

a) Yes, BHI has taken a number of steps since the May 2018 windstorm to improve its risk assessment and planning in light of increasing extreme weather events, including but not limited to:
   - Performed an Asset Condition Assessment in support of it's 2021-25 Distribution System Plan, to help identify particular asset classes with substandard performance or that pose a high risk of failure within the system, which are then flagged for correction and mitigation;
   - Annual System Performance Analysis (worst performing feeder, system risk analysis, system demand/loading analysis);
   - Increased investment in the renewal of legacy assets, through reinforcement and replacement, which contribute to system hardening by improving asset health and introducing updated equipment design and construction standards that are better suited to the changing operating environment;
   - Installation of remote controlled switches in more areas of BHI's service territory;

- Expansion of the 'self healing grid' network in an effort to isolate faults and switch devices to restore power automatically, including in the northern rural area of Burlington where there is more exposure to weather;
- Feeder coordination studies; and
- Improved protection coordination to limit the customers that would be impacted by a storm.

b) BHI provides its annual budgeted and actual amounts for capital expenditures and OM&A related to emergency response for the period 2017 to present in Table 1 below.

Table 1: Budgeted vs. Actual Emergency Response Costs

Emergencey Response Costs								
Year	OM&A				Capital			
	Budget $	Actual Z-factor $	Actual Non Z-factor $	Total Actual $	Budget $	Actual Z-factor $	Actual Non Z-factor $	Total Actual $
2017	$0	$0	$0	$0	$0	$0	$205,821	$205,821
2018	$0	$295,115	$51,531	$346,646	$0	$332,678	$351,182	$683,860
2019	$0	$0	$29,301	$29,301	$0	$0	$108,817	$108,817
2020	$0	$0	$0	$0	$0	$0	$0	$0
2021	$14,000	$0	$0	$0	$0	$0	$0	$0
SubTotal	**$14,000**	**$295,115**	**$80,832**	**$375,947**	**$0**	**$332,678**	**$665,820**	**$998,498**
2022 (Jan-Oct)	$12,034	$177,695	$84,255	$261,950	$0	$314,975	$21,085	$336,059
Total	**$26,034**	**$472,810**	**$165,087**	**$637,897**	**$0**	**$647,653**	**$686,905**	**$1,334,557**

Staff-7

Ref 1: Manager's Summary, Table 22, p.35
Ref 2: Manager's Summary, Table 23, p.35

Burlington Hydro provides the summary of storm costs in Reference 1 and the summary of the Z-factor claim in Reference 2.

Questions:

a) Based on the data in Reference 1, please provide the breakdown of the storm costs in the following format:

Cost Category	Capital Cost $	O & M Cost (Regular - Time Labour) $	O & M Cost (Recorded in Account 1572) $	Total Cost $
Burlington Hydro Labour (Regular)				
Burlington Hydro Labour (Overtime)				
Materials				
LDC Mutual Aid Costs				
Contracted Services - Line Services				
Contracted Services - Excavation and Tree Removal				
Other				
Total				

b) Please confirm that the costs included in the Z-factor claim in Reference 2 are incremental costs (outside of the base upon which rates were derived).
   i) Please provide additional information to illustrate that these costs are incremental to what underpins rates.

c) Please confirm that the Z-factor claim is directly related to the Z-factor event and if the windstorm event had not occurred, Burlington Hydro would not have incurred any of the costs.

d) Please clarify the cost categories and dollar amounts that have not been audited in relation to the restoration of power after the windstorm.

e) Please indicate when the above costs will be audited.

Responses:

a) BHI provides a breakdown of the storm costs in the required format in Table 1 below. Please note that only costs in the "Capital Cost $" and "O & M Cost (Recorded in Account 1572) $" columns are included in the "Total Cost $" column, as these are the relevant costs included in BHI's Z-factor claim.

Table 1: Breakdown of May 21, 2022 Storm Costs

Cost Category	Capital Cost $	O & M Cost (Regular - Time Labour) $	O & M Cost (Recorded in Account 1572) $	Total Cost $
BHI Labour (Regular)	$12,859	$3,047	$8,404	$21,263
BHI Labour (Overtime)	$69,705	$8,686	$23,953	$93,658
Materials	$34,159	$6,742	$3,943	$38,101
LDC Mutual Aid Costs	$59,199	$0	$20,991	$80,191
Contracted Services - Line Services	$127,402	$0	$20,290	$147,692
Contracted Services - Excavation and Tree Removal	$0	$0	$88,845	$88,845
Other	$11,650	$65,780	$11,269	$22,919
Total	**$314,975**	**$84,255**	**$177,695**	**$492,669**

b) BHI confirms that the costs included in the Z-factor claim in Reference 2 are incremental costs and outside of the base upon which rates were derived. BHI budgeted $14,000 in OM&A costs and $0 in capital costs for emergency response costs in its 2021 Cost of Service. BHI has incurred in excess of these amounts in emergency response costs which are not included as part of its Z-factor claim. Therefore, all of the costs included in the Z-factor claim are incremental to what underpins rates. Refer to Staff-6 b) for a comparison of actual vs. budgeted capital and OM&A emergency response expenditures.

c) BHI confirms that the Z-factor claim is directly related to the Z-factor event and if the windstorm event had not occurred, BHI would not have incurred any of the costs.

d) None of the above cost categories and dollar amounts in relation to the restoration of power after the windstorm have been audited at this time.

e) The above costs will be audited as part of BHI's 2022 fiscal year-end audit. Audited Financial Statements will be available April 2023.

Staff-8

Ref: Manager's Summary, p.37

Questions:

a) Please provide a breakdown of all Burlington Hydro's internal labour costs applicable for the affected period in the following format:

Department	Number of Eligible Employees	Number of Regular Hours Worked	Total Regular Time Payments ($)	Number of Overtime Hours Worked	Total Overtime Payments ($)
Management					
Other Non-Union Employees (Health and Safety)					
Sub-Total Non-Union					
Union Employees:					
Operations					
Other					
Sub-Total Union					
Total Internal Labour for Affected Parties					
Total Z-Factor O&M Labour Costs					
Total Non-Z-Factor O&M Labour costs					
Total Non-Z-Factor Capital Labour costs					

b) Please provide Burlington Hydro's policy with respect to overtime for its non-union employees and management.

c) Please describe whether the Z-factor labour costs included payments made to union employees at regular rates of pay for work on pre-scheduled vacation days.

Responses:

a) A breakdown of BHI's internal labour costs (capital and operating) applicable for the affected period is provided in Table 1 below.

Table 1: Breakdown of BHI's internal labour costs

Department	Number of Eligible Employees	Number of Regular Hours Worked	Total Regular Time Payments ($)	Number of Overtime Hours Worked	Total Overtime Payments ($)
Management	4	48	$2,660	118	$13,273
Other Non-Union Employees (Health and Safety)					
Sub-Total Non-Union					
Union Employees:					
Operations	25	437	$18,603	815	$80,385
Other					
Sub-Total Union					
Total Internal Labour for Affected Parties					
Total Z-Factor O&M Labour Costs	15	180	$8,404	242	$23,953
Total Non-Z-Factor O&M Labour costs					
Total Non-Z-Factor Capital Labour costs					

Total Z-Factor Capital Labour Costs	20	305	$12,859	691	$69,705

b) BHI provides its Overtime Policy for Management/Non-Union employees as Appendix A.

c) No, the Z-factor labour costs did not include payments made to union employees at regular rates of pay for work on pre-scheduled vacation days.

Staff-9

Ref 1: Manager's Summary, Table 22, p.22
Ref 2: Manager's Summary, p.37
Ref 3: EB-2018-0021

In Reference 1 and 2, staff notes that Burlington Hydro relied partially on support from alliances and mutual assistance agreements in the restoration effort.

Questions:

a) Provide a copy of Burlington Hydro's most current Emergency Operations Plan.

b) Discuss any deviations from Burlington Hydro's Emergency Operations Plan.

c) Explain who Burlington Hydro's alliances were that they relied on.

d) Clarify whether Burlington Hydro paid any premium amounts to its third-party contractors.

e) Provide a separate schedule (breakdown) of each third party contractor invoice based on labour, materials, accommodations, meals, truck, other (provide explanation).

Responses:

a) BHI provides a copy of its Emergency Response Plan as Appendix B.

b) BHI did not deviate from its Emergency Response Plan.

c) BHI utilized its membership in the Ontario Mutual Aid Group (OnMAG) and its alliance agreements with K-Line Line Construction and Black & MacDonald.

d) BHI paid overtime labour rates to its third party contractors as the event occurred outside of regular hours.

e) BHI provides a separate schedule (breakdown) of each third party contractor invoice based on labour, materials, accommodations, meals, truck, other in the Table 1 below.

Table 1: Breakdown of third-party contractor invoice

Category	Davey Tree $	Beswick Tree Service $	Kodiak Tree Services $	Under Pressure $	CN Rail $	Black & McDonald $	K-Line Maintenance $	Safeline Utility Services $	Niagara Peninsula Energy Inc. $	Canadian Niagara Power $	North Bay Hydro $	Total $
Labour	$1,634	$4,000	$67,164	$21,815	$1,808	$37,021	$49,685	$0	$39,686	$3,888	$12,256	$238,957
Materials	$0	$0	$0	$949	$0	$0	$0	$2,690	$0	$0	$0	$3,639
Accommodations	$0	$0	$0	$0	$0	$0	$4,137	$0	$2,351	$0	$1,433	$7,921
Meals	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$476	$476
Rental	$0	$0	$16,047	$0	$0	$10,287	$16,525	$0	$13,865	$0	$3,824	$60,549
Other [1]	$0	$0	$0	$1,800	$975	$0	$0	$0	$2,301	$0	$111	$5,187
Total	**$1,634**	**$4,000**	**$83,211**	**$24,564**	**$2,783**	**$47,308**	**$70,347**	**$2,690**	**$58,202**	**$3,888**	**$18,100**	**$316,728**

[1] Other includes Dumping fees and Miscellaneous costs

Staff-10

Ref: Manager's Summary, p.33-34

Burlington Hydro did not indicate it assisted neighboring communities once power was restored to its customers.

Questions:

a) Please confirm Burlington Hydro did not assist other LDCs.

b) If Burlington Hydro did assist neighboring communities, did it charge a premium to assist other LDCs. If so, please provide the details.

Responses:

a) BHI confirms it did not assist other LDCs once power was restored to its customers.

b) Not applicable.

Staff-11

Ref: Manager's Summary, p.34

a) Has all restoration work been completed? If not, please describe the work that remains from the storm, and provide the estimated costs for the respective work

b) Please explain how Burlington Hydro differentiates between any asset replacement required as a result of the storm and any asset replaced as part of the regular pole replacement program.

c) Please provide the total pole replacement cost and the number of poles replaced due to the storm.

d) What was Burlington Hydro's budgeted cost for the pole replacement in 2022?

e) What was Burlington Hydro's actual pole replacement costs in 2022. Please explain the variance from the answer for (d).

f) Has Burlington Hydro deferred any planned capital projects due to the costs of the windstorm? If so, please provide the details.

Responses:

a) All restoration work has been completed.

b) Asset replacement required as a result of the storm is identified during BHI's storm response which includes extensive patrolling to assess damage and cause of outages. Poles to be replaced as part of the regular pole replacement program are identified through BHI's ongoing regular asset inspection program. All poles replaced as a result of this storm were downed poles which were not in that condition prior to this event i.e. they triggered outages identified by BHI or customers during, and as a result of, the storm.

c) The total pole replacement cost was $314,975 and the number of poles replaced due to the storm was twenty (20).

d) BHI's budgeted cost for pole replacement in 2022 is $1.1M.

e) BHI's actual YTD pole replacement cost as of October 2022 is $870k. BHI plans to spend its budget of $1.1M on pole replacements in 2022. These costs exclude pole replacement costs included in the Z-factor claim.

f) No, BHI has not deferred any planned capital projects due to the costs of the windstorm.

Staff-12

Ref: Manager's Summary, p.33

Burlington Hydro describes the wind gusts of up to 140 km/hr which caused trees and poles to fall, resulting in outages.

Questions:

a) Please provide Burlington Hydro's annual budget and actual amounts for its vegetation management program for the period 2017 to date.

b) Does Burlington Hydro have an assessment program to determine trees that could potentially cause damage to its line infrastructure due to severe weather events? If not, please explain why.

Responses:

a) BHI's annual budget and actual amounts for its vegetation management program for the period 2017 to date are provided in the Table 1 below.

Table 1: Vegetation Management Expenditures – Actual vs. Budget

Vegetation Management		
Year	**Approved in Rates $ ***	**Actual $**
2017	$573,110	$574,272
2018	$579,128	$494,106
2019	$586,946	$527,241
2020	$597,805	$667,962
2021	$768,502	$488,028
2022 Oct YTD	$660,592	$536,917
Total	**$3,766,083**	**$3,288,526**

** Represents amounts approved in BHI's 2014 and 2021 Cost of Service applications escalated by the Board approved annual rate adjustment*

b) Yes, BHI assesses and identifies trees that could potentially cause damage to its line infrastructure, including due to severe weather events, as part of its vegetation management program.

Staff-13

Ref: Manager's Summary, p.38

In light of current economic conditions (i.e. high inflation and rising interest rates) it may have on Burlington Hydro's customer base, please explain whether Burlington Hydro has:

a) performed an assessment on its customers' current ability to pay for an incremental amount related to the Z-factor, given the current economic environment?

b) considered any other bill impact mitigation strategies to assist its customers in being able to absorb this incremental amount?

Responses:

a) No, BHI has not performed an assessment on its customers' current ability to pay for an incremental amount related to the Z-factor.

b) No, BHI has not considered any other bill impact mitigation strategies to assist its customers in being able to absorb this incremental amount. BHI follows the Board's guidance on rate mitigation plans, which are required where total bill increases for any customer class exceed 10%[1]. Total bill increases for all customer classes are below 1.9%, inclusive of the proposed Z-factor amounts. The incremental amounts related to the Z-factor are $0.17 and $0.38 per month for residential and GS<50 customers respectively - less than a 0.2% impact on the total bill.

[1] Chapter 3 Filing Requirements For Electricity Distribution Rate Applications - 2022 Edition for 2023 Rate Applications, May 24, 2022, page 7.

Staff-14

Ref: Manager's Summary, p.27

Burlington Hydro notes that there is a difference of $171,979 between its LRAMVA and the figures filed as part of its 2021 RRR filing as the RRR filing was based on estimated lost revenues.

Question:

a) Please confirm that Burlington Hydro is only seeking recovery of the debit balance in the LRAMVA of $169,106 based on lost revenues in 2021.

Response:

a) Confirmed, BHI is only seeking recovery of the debit balance in the LRAMVA account of $169,106 based on lost revenues in 2021.

Staff-15

Ref: LRAMVA work form, Tab 5 – 2015-2027 LRAM

Burlington Hydro has included persisting lost revenues from programs delivered between 2013 to 2021.

Questions:

a) Please discuss why Burlington Hydro has included persisting savings from 2013 to 2020 CDM programs as part of its LRAMVA calculation when these values were to be incorporated as part of Burlington Hydro's updated load forecast that was approved in its 2021 cost of service application. Please provide any references to the OEB accepting that Burlington Hydro is able to claim persisting CDM savings from historic years.

b) Please provide an updated LRAMVA workform that removes all historic lost revenues captured in Burlington Hydro's updated load forecast approved in its 2021 cost of service application.

Responses:

a) BHI has only included the portion of persisting savings from 2013 to 2020 CDM programs as part of its LRAMVA calculation that were not incorporated in its approved 2021 load forecast. BHI's updated load forecast that was approved in its 2021 cost of service application took effect in May 2021, therefore BHI has lost revenue associated with the period from January 1 to April 30, 2021. Only lost revenues from one-third of the persistent savings from 2013-2020 are included in the calculation (see Tab 5, cell AF1381 of the LRAMVA workform for an example). This is consistent with the Board's *Updated Policy for the Lost Revenue Adjustment Mechanism Calculation: Lost Revenues and Peak Demand Savings from Conservation and Demand Management Programs*, which states:

"The LRAMVA threshold value is the anticipated lost revenue amount (based on anticipated CDM savings) based on what is reflected in the underlying load forecast (i.e., used for billing determinants, as applicable) when the distributor has rebased rates through a cost of service (or Custom IR) application. This value is compared with actual lost revenues (based on actual CDM savings) to generate the final LRAMVA amount."[2]

[2] EB-2016-0182, May 19, 2016, page 8

b) The LRAMVA workform filed as part of BHI's original application already removed all historic lost revenues captured in BHI's updated load forecast approved in its 2021 cost of service application.

Staff-16

Ref: Manager's Summary, p. 30

Burlington Hydro noted in its discussion of the Streetlighting Retrofit Project that although it included forecast demand savings in its load forecast in the 2014 cost of service application, it did not include any additional streetlight savings in its updated 2021 load forecast.

Question:

a) Please explain why no additional demand savings were incorporated.

Response:

a) The City of Burlington completed its conversion of streetlights to LEDs in 2018. No new conversions after 2018 are anticipated and therefore BHI did not include additional savings in its updated 2021 load forecast.

Staff-17

Ref: LRAMVA work form, Tab 5 – 2015-2027 LRAM
OEB 2021 CDM Guidelines (EB-2021-0106), December 20, 2021, p. 26
Guidance on Prospective Lost Revenue Adjustment Mechanism (LRAM) Amounts – 2023 Rates, June 3, 2022

The 2021 CDM Guidelines (section 8) require distributors filing an application for 2023 rates to seek disposition of all outstanding LRAMVA balances related to previously established thresholds, including approval of LRAM-eligible amounts in future years (arising from persisting savings) until a distributor's next rebasing application, unless a distributor does not have complete information on eligible savings.

The additional guidance provided in June 2022 noted that the expectation is that distributors with prospective LRAMVA balances, beginning with 2023 amounts, will seek disposition at the time of the corresponding rate year. That means that for distributors with 2023 prospective LRAMVA balances, the expectation is that these amounts will be included in the 2023 rate generator model and addressed as part of this year's rate applications.

Questions:

a) Please confirm that Burlington Hydro will not be seeking to dispose of any balance in the LRAMVA due to LRAM-eligible CDM activities funded by the IESO through the Conservation First Framework or Interim Framework in a future year's rate application.

b) If not confirmed, please explain why a request for disposition was not submitted as part of this application.

c) If not confirmed, please update the LRAMVA workform to include any persisting LRAMVA amounts into all future years until Burlington Hydro's next rebasing application.

d) If confirmed, please also confirm that Burlington Hydro has verified that, relative to the LRAMVA threshold established in Burlington Hydro's most recent rebasing application, the balance in the LRAMVA, and any prospective LRAM-eligible amounts until the next rebasing, are either zero or a debit (i.e., not a credit that would need to be refunded to customers).

Responses:

a) BHI does not confirm that it will not be seeking to dispose of any balance in the LRAMVA due to LRAM-eligible CDM activities funded by the IESO through the Conservation First Framework or Interim Framework in a future year's rate application.

b) A request for disposition of LRAM-eligible amounts in future years was not submitted as part of this Application because BHI has CDM projects subject to the CFF extension directive that had not come into service at the time of filing.

c) BHI is not seeking disposition of persisting LRAMVA amounts into all future years until its next rebasing application, and therefore has excluded these amounts from the LRAMVA workform in this Application.

d) Not applicable.

VECC-1

Ref: Manager's Summary, Page 37 Table 22

BHI's Z-Factor Event Costs are as follows:

Category	Operating $	Capital $	Total $
Incremental Labour/Material/Vehicle Costs	$47,568	$128,373	$175,941
3rd Party Contractors	$109,135	$127,402	$236,537
Grid Smart City Partners	$20,991	$59,199	$80,191
Total	**$177,695**	**$314,975**	**$492,669**

a) Please confirm overhead burdens in operating expenses are not included in the Z-factor claim.

b) Please confirm regular labour is not included in the Z-factor claim.

c) Please provide a breakdown of incremental labour costs in the same format as Staff IR-15 part (a) in EB-2018-0021.

a) Please provide a breakdown of material capital costs. Please provide a list of major asset quantities replaced due to the storm.

d) Please identify any relevant changes to BHI's 2018 Overtime Policy filed as Appendix C to OEB Staff Interrogatory Responses in EB-2018-0021.

e) Please provide a breakdown of 3rd party contractor operating and capital costs under the following categories: labour, materials, vehicles, accommodations and any other categories BHI deems relevant.

f) Please provide details of any premium amounts BHI paid to its 3rd party contractors.

g) Please confirm when BHI's Z-factor costs will be audited.

h) Please provide a summary of BHI's previous Z-factor storm claims and the amounts approved.

Responses:

a) BHI confirms that overhead burdens in operating expenses are not included in the Z-factor claim.

b) BHI included regular labour costs directly related to the Z-factor event in its Z-factor claim.

c) Please refer to BHI's response to Staff-8 a).

a) Please see BHI's response to Staff-7 a). BHI replaced twenty (20) wood poles due to the storm.

d) BHI confirms there are no relevant changes to BHI's 2018 Overtime Policy filed as Appendix C to OEB Staff Interrogatory Responses in EB-2018-0021.

e) BHI provides a breakdown of 3rd party contractor operating and capital costs in Table 1 below.

Table 1: Breakdown of 3rd party contractor costs (Operating and Capital)

Category	Operating $	Capital $	Total $
Labour	$106,306	$132,650	$238,957
Materials	$0	$3,639	$3,639
Vehicles/Equipment Rental	$20,207	$40,342	$60,549
Accommodations	$348	$7,573	$7,921
Other	$3,265	$2,397	$5,662
Total	**$130,126**	**$186,601**	**$316,728**

f) Please refer to BHI's response to Staff-9 d).

g) Please refer to BHI's response to Staff-7 e).

h) BHI provides a summary of its previous Z-factor storm claims and the amounts approved in Table 2 below.

Table 2: BHI's previous Z-factor storm claims and the amounts approved

Application	Claimed Amount $	Approved Amount $
EB-2018-0021	$368,487	$323,245*
EB-2014-0252	$579,365	$579,365

** BHI revised its Z-factor claim as part of its interrogatories response to exclude overhead burdens in operating expenses included in error.*

VECC-2

Ref: Manager's Summary, Page 37

The evidence states "BHI has several strategies for mitigating the impact of extreme weather events, however it could not have foreseen, planned or budgeted for the storm experienced on May 21. Therefore, the costs associated with this extreme weather event were not included in the rates approved in BHI's 2021 Cost of Service.

a) Please summarize BHI's strategies to mitigate the impact of extreme weather events.

b) Please provide BHI's s annual Emergency Maintenance amounts budgeted and included in rates, compared to actual expenditures for the years 2018 to 2021 and 2022 year-to-date.

c) Please provide BHI's annual capital demand response/storm amounts budgeted and included in rates, compared to actual expenditures for the years 2018 to 2022 year-to-date.

Responses:

a) Please refer to BHI's response to Staff-6 a).

b) Please refer to BHI's response to Staff-6 b).

c) Please refer to BHI's response to Staff-6 b).

VECC-3

A distributor is expected to supply the details of management's plans for addressing these events in support of the distributor's request for special cost recovery.

a) Please provide the latest version of BHI's Emergency Operations Plan.

b) Please confirm there were no deviations from BHI's Emergency Operations Plan.

Responses:

a) Please refer to BHI's response to Staff-9 a).

b) Please refer to BHI's response to Staff-9 b).

VECC-4

With respect to BHI's vegetation management:

a) Please provide BHI's vegetation management cycle.

b) Please list the vegetation management areas and zones impacted by the storm.

c) Please provide BHI's Vegetation Management Accomplishments (Planned compared to Actuals) in the same format as Table 9 in VECC-IR-14 part (c) for the years 2019 to 2022.

d) Please provide BHI's annual vegetation management budget vs. actuals for each of the years 2018 to 2022.

e) Please provide the vegetation management amount approved in 2021 base rates.

Responses:

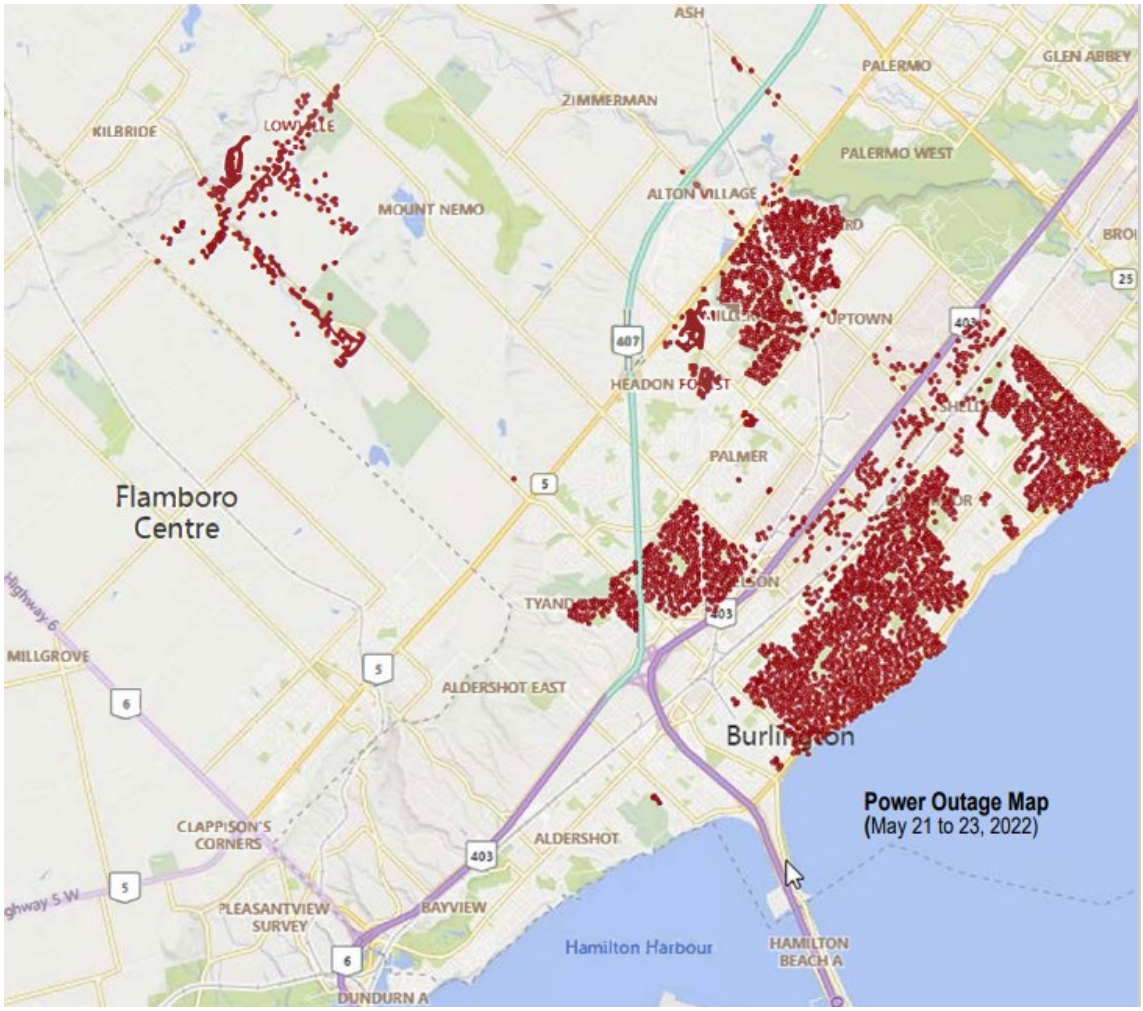
a) BHI's vegetation management cycle is three years.

b) BHI provides a list of its vegetation management areas and zones impacted by the storm in Table 1. BHI provides a visual representation of the areas impacted by the storm in Figure 1.

Table 1: Areas and zones impacted by the storm

Area/Zone	Street Borders
Zone 1 - Area C	Walkers to Appleby; Lakeshore to Fairview (mostly rear lot)
Zone 2 - Area C	Appleby to Burloak; Lakeshore to Fairview (mostly rear lot)
Zone 3 - Area C	Appleby to Burloak; Fairview to Dundas
Zone 4 - Area C	Burloak to Walkers; Fairview to Dundas
Zone 6 - Area B	Lakeshore to Fairview, Walkers to Guelph
Zone 7 - Area B	Guelph to Brant, Lakeshore to Fairview
Zone 9 - Area B	Guelph to Brant, Fairview to Upper Middle
Zone 12 - Area B	Walkers to Brant, Dundas to Britannia

Figure 1 - Areas and zones impacted by the storm



c) BHI's vegetation management accomplishments for each of the years 2019 to 2022 YTD Oct compared to plan are provided in Table 2 below.

Table 2: Vegetation Management Accomplishments

Year	Planned Areas/Zones	Actual Areas/Zones
2019	13, 14, 15, 16, 17	Zone 15 and 17 completed; Zone 13 70% completed; Zone 14 and 16 not completed
2020	7, 13 (partial), 14, 16	100% completed
2021	1, 2, 3, 4, 5 ,6	Zones 1, 3, 4, 5 100% completed; Zones 2 and 6 50% completed
2022 Oct YTD	8, 9, 10, 11, 12, 13, 15, 17	Zones 8, 10, 11, 12, 15, 17 completed; Zone 9 50% completed; Zone 13 deferred

d) Please refer to BHI's response to Staff-12 a).

e) Please refer to BHI's response to Staff-12 a).

SBUA-1

Exhibit 1, Page 33. Reference: Z-Factor Claim

According to the Report of the Board on 3rd Generation Incentive Regulation for Ontario's Electricity Distributors (July 15, 2008), the "Distributors are expected to report events to the Board promptly".

a) Before September 2022, did Burlington Hydro Inc. report to the board the event occurred on May 21, 2022? If not, why?

Response:

a) Yes, BHI notified the Board of the May 21, 2022 Major Event on July 12, 2022, and notified the Board of its intention to file a Z-factor application on September 1, 2022.

SBUA-2

Exhibit 1, Page 33. Reference: Z-Factor Claim

a) Which actions were taken by Burlington Hydro Inc. immediately after Environment Canada issued the warning on May 21, 2022? If any.

b) Please provide a copy of the warning issued by Environment Canada on May 21, 2022, and any other received for Burlington Hydro Inc. in the previous days.

Please provide the documents and information on which the company bases its response.

Responses:

a) Immediately after Environment Canada issued the warning on May 21, 2022, BHI staff were already responding to the storm. BHI did not receive advance warning of this major event.

b) Historical Weather Alerts are not available on the Environment Canada website. BHI provides a screenshot of its "retweet" of the warning issued by Environment Canada on May 21, 2022 below.

SBUA-3

Exhibit 1, Page 34. Reference: Z-Factor Claim

According to your application, the service was restored to 90% of the affected customers by 9:43 pm the same day of the windstorm.

a) When was restored the service to 10% of the remaining affected customers after the windstorm on May 21, 2022?

b) Why the service to 10% of the remaining affected customers could not be restored at the same time as the other ones?

c) What activities were necessary to perform to restore the service to 10% of the remaining affected customers?

Please provide the documents and information on which the company bases its response.

Responses:

a) Service was restored to the remaining 10% of customers affected by the May 21, 2022 windstorm by May 24, 2022.

b) Service to the 10% of remaining affected customers could not be restored at the same time as the other customers because of longer restoration times in rear lot areas, where specialized climbing equipment was required to restore power. BHI prioritized its efforts to where it could restore power to the greatest number of customers in the least amount of time.

c) Please see BHI's response to b) above.

SBUA-4

Exhibit 1, Page 35. Reference: Z-Factor Claim

According to the Filing Requirements For Electricity Distribution Rate Applications (May 24, 2022), section 3.2.8.1., "*A distributor must submit evidence that the cost incurred meet the three eligibility criteria of causation, materiality, and prudence*".

a) Regarding the materiality and causation, please provide a clear explanation of the activities carried out on May 21, 2022, and the days after in order to restore and mitigate the damages caused by the powerful wind and thunderstorm. Please specify the activity and the amount.

b) Regarding prudence, please provide a clear and detailed explanation of why Burlington Hydro Inc. considers the cost incurred were the "*most cost-effective option for rate payers*".

c) In relation to prudence, what alliances and mutual aid agreements to restore were used?

Please provide the documents and information on which the company bases its response.

Responses:

a) BHI carried out the following activities, among others, on May 21, 2022 and the days after in order to restore power to its customers from the extreme weather event:
   - Assessment of damage and outage causes through extensive patrolling;
   - Isolating and re-routing power from impacted infrastructure in coordination with BHI's control room to ensure the safety of the public, BHI staff, and contractors;
   - Removal of branches and uprooted trees from power lines and equipment;
   - Restoration of downed power lines and twenty (20) downed distribution poles;
   - Restoration of eight main 27.6 feeders and twelve 13.8/8 kV feeders that were locked out indicating damage or faults to those areas, which required extensive patrol and repairs before power could be restored;
   - Restoration of infrastructure in rear lot areas, where specialized climbing equipment was required to restore the power;
   - Other repairs to damaged infrastructure as required;
   - Safely returning isolated sections of the distribution system to service.

   BHI did not track amounts incurred by activity as it would be impracticable to do so and impede restoration of power to customers.

b) Please refer to the section on Prudence (page 37) in BHI's application for a clear and detailed explanation of why BHI considers the cost incurred were the "*most cost-effective option for rate payers*".

c) Please refer to BHI's response to Staff-9 c).

SBUA-5

Exhibit 1, Page 36. Reference: Z-Factor Claim

According to the Filing Requirements For Electricity Distribution Rate Applications (May 24, 2022), section 3.2.8., "*Cost are to be recorded in Account 1572, Extraordinary Events Costs*".

a) Please confirm the costs associated with the May 21, 2022 event were recorded in Account 1572.

Please provide the documents and information on which the company bases its response.

Response:

a) BHI confirms the costs associated with the May 21, 2022 event were recorded in Account 1572.

BHI is unable to provide the documents and information on which it based its response as 2022 OEB financial statements are not available until April 2023.

SBUA-6

Exhibit 1, Page 33. Reference: Z-Factor Claim

According to the Filing Requirements For Electricity Distribution Rate Applications (May 24, 2022), section 3.2.8.2., "*As part of its claim, a distributor must outline how it intends to allocate the incremental revenue requirement to the various customer rate classes, the rationale for the selected approach and a discussion of the merits of alternative allocation methods*".

a) Did Burlington Hydro Inc. carry out a discussion of the merits of alternative allocation methods?

b) If so, where the intervenors can find it?

c) If not, could the company provide a discussion of the alternative allocation methods?

Please provide the documents and information on which the company bases its response.

Responses:

a) No, BHI did not carry out a discussion of the merits of alternative allocation methods. BHI's considers its proposal to allocate the Z-factor event costs to all rate classes based on its last Board-approved distribution revenue to be reasonable and consistent with previous Board decisions[3].

b) Not applicable.

c) Please refer to the Board's cost allocation polices in its reports of November 28, 2007 *Report of the Board on Application of Cost Allocation for Electricity Distributors*[4] and March 31, 2011 *Review of Electricity Distribution Cost Allocation Policy*[5].

[3] EB-2022-0019, December 8, 2022, page 17
[4] EB-2007-0667
[5] EB-2010-0219

SBUA-7

Exhibit 1, Page 33. Reference: Z-Factor Claim

a) What preventive measures has Burlington Hydro Inc. adopted to act diligently and promptly in the event of this type of occurrence?

b) Has Burlington Hydro Inc. identified what potential damages generally occurred in the event of this type of occurrence?

c) What preventive measures has Burlington Hydro Inc. adopted to mitigate the potential damages that generally occurred in the event of this type of occurrence?

Please provide the documents and information on which the company bases its responses.

Responses:

a) BHI has adopted several measures to act diligently and promptly in the event of this type of occurrence, including but not limited to:
   - BHI's Emergency Response Plan, filed as Appendix B;
   - Membership in the Ontario Mutual Aid Group (OnMAG);
   - Alliance agreements with several external contractors (e.g., K-Line Line Construction and Black & McDonald), who can assist in restoration efforts; and
   - Agreements with tree trimming contractors to assist with emergency line clearing and related duties.

b) Yes, BHI has identified the potential damages that generally occur in this type of event, including but not limited to broken tree branches; trees falling onto wires and poles resulting in conductor on the ground; and broken or damaged poles, cross arms, switches and service masts.

c) Please refer to BHI's response to Staff-6 a).

Appendix A

BHI Overtime Policy

HR195

Overtime

for

Management/Non-Union/Students

Date: July 2021 – V.2

Issued by: Director of People and Culture

Approved by: EVP Corporate and CPO

Review Schedule - **Annual**

Table of Contents

1.0 Introduction

Burlington Enterprises Corporation (BEC or the Company) provides eligible salaried employees overtime determined by situation and circumstances. Considerations are given to the situation, the length and necessity of the overtime and the consistency with company practice.

2.0 Policy Scope

This Policy applies to all salaried employees (management and non-union). Overtime provisions for Union employees are governed by the terms of the Collective Agreement.

3.0 Overtime Eligibility for Salaried Employees

Due to the nature of their positions, Trades Supervisors from time to time are required to work overtime.

All other salaried employees who perform professional/management/supervisor/leadership functions primarily are generally exempt from overtime.

4.0 When Overtime is Acceptable

Eligible employees are only entitled to overtime wages for work that is requested, acknowledged or authorized by the employer. Burlington Hydro Inc. provides eligible employees overtime pay only when it involves planned overtime, overtime for projects with strict timelines that require work to be completed in a condensed period of time, after-hour emergencies or extenuating circumstances. Overtime will **not** be authorized for administrative work. Overtime will be paid to students as per Ontario Employment Standards Act

Meal Allowances do not apply to non-unionized employees. Expense meals as appropriate with relevant Business Expense (HR110).

5.0 Time Management

All salaried employees are expected to manage workload effectively and delegate appropriately to meet their objectives and work targets. Employees are expected to identify staffing and training/development opportunities to their Departmental Head.

6.0 Extraordinary Efforts

When extraordinary after-hour individual efforts/contributions by salaried employees have been identified by their departments, time-off or a special bonus may be considered as approved by VP, Corporate Relations and CEO.

7.0 Processing Overtime & Authorization

Employees are responsible to inform and/or obtain approval for all overtime work completed from their direct Manager. Overtime work, in excess of 40 hours per week, must be authorized by the Manager. Authorized overtime hours worked is paid at the rate of two (2) times the employee's base hourly rate.

8.0 Compliance

Compliance with the provisions and expectations of this Policy is an essential element in the Company's business success. Managers/Supervisors are responsible for ensuring the provisions of this Policy are communicated to, understood and observed by all employees. Failure to conduct oneself in accordance with this Policy will result in the individual(s) being subject to appropriate corrective action, which may include, where appropriate, disciplinary action, up to and including termination.

9.0 Inquiries

For further information regarding this policy, contact Human Resources.

10.0 Supporting Policies

Employees are expected to understand, follow align his/her obligations under all relevant policies.

- Business Expenses (HR110)

Appendix B

BHI Emergency Response Plan

Table of Contents

Revision History

Revision Date	V#	Details
July 2022	V.0	Revised to new formant. Last revision in 2017.

Part 1 – Introduction

1.0 Introduction

This Emergency Response Plan (ERP) has been prepared to provide key officials, agencies, and employees with a general guideline to the initial response to an emergency and an overview of their responsibilities during an emergency.

For the ERP to be effective, it is important that all concerned be made aware of its provisions and that everyone be prepared to carry out their assigned functions and responsibilities in an emergency.

Each Department within Burlington Hydro has the responsibility of being the first to respond in an emergency. The head of the affected department may request assistance from other departments within Burlington Hydro without contacting the Emergency Coordinator. This may be done without activating the Burlington Hydro Emergency Notification system (refer to Part 3).

However, when the resources of the affected department are deemed insufficient to control the emergency, the Emergency Coordinator or their alternate shall activate the Burlington Hydro Emergency Notification system in the ERP.

Once the ERP is activated, overall co-ordination and deployment of resources required to mitigate the effect(s) of the emergency will be the responsibility of the Emergency Control Group (ECG).

However, it should be stressed that in any emergency or threat of emergency, members of the Emergency Control Group (refer to Part 4), may be called together to make decisions, or to be on standby, without having to declare activation of the ERP.

1.1 Purpose

The purpose of this emergency plan is to deal with all types of emergencies identified by the Risk Assessment and listed as scenarios. One major risk is power disruption or loss of power to our distribution system and this ERP aims at minimizing this impact to our customers. The ERP is a fundamental part of Burlington Hydro's Health, Safety and Environmental Management System (HSEMS), Emergency Preparedness, Prevention and Response, which includes this ERP, the Fire Safety Plan and Rescue Planning and Training.

1.2 Scope and Applicability

1.2.1 Legislation and Standards

The Electricity Act of 1998, which forms Schedule A of the Energy Competition Act, includes provisions for emergency planning. The following excerpts from the Act are provided as illustration that greater emphasis on emergency planning and accountability is a component of the new legislation governing the electric utility industry in Ontario. Section 39(2) states that: *"the Minister of Energy, Science* & *Technology may require participants in the competitive Ontario Electricity market to prepare and file with the minister such emergency plans as the Minister considers necessary."*

1.2.2 Safety

It is the duty and responsibility of everyone to work safely, with equal concern for the safety of coworkers and the public. The Electrical Utility Safety Rules (EUSR), Burlington Hydro's Health, Safety and Environment Management System (HSEMS), Safe Work Practices, Procedures and Rules, the Occupational Health and Safety Act and Regulations, and Environmental Protection Act legislation must be followed.

1.2.3 Communications Liability

Any suggested courses of action and safety warnings for power outages that is offered to the public, will be done, without holding Burlington Hydro responsible or indicating that the suggested actions are mandatory measures. These tips and warnings will be made to the public on an ongoing basis.

1.2.4 Due Diligence

Where outside service providers are procured for emergency situations, Burlington Hydro will do everything reasonable to ensure that these external agents meet all obligations specified in our Due Diligence policy. Burlington Hydro will also ensure that these external agents have valid liability insurance with minimum acceptable limits and coverage, and which covers the utility as an added insured in the event of the agent's negligence.

1.3 ERP Planning Committee, Emergency Control Group and Support Group Compositions

ERP Planning Committee	Emergency Control Group (ECG)	Emergency Support Group
- VP Engineering Services and Network Operations (Emergency Coordinator) - EVP, Corporate and CPO - VP and CFO - Director, Engineering - Director, Operations - Director, Health & Safety - Manager, Facilities & Security	- President and CEO - VP Engineering Services & Network Operations **(Emergency Coordinator**) - EVP, Corporate and CPO - VP and CFO - Director, Communications - Director, Engineering (Alternate Emergency Coordinator) - Director, Health & Safety - Director, Operations (Alternate Emergency Coordinator)	- VP, Information Technology and CIO - Director, Human Resources - Manager, Customer Accounts - Manager, Facilities & Security - Manager, Metering & Tech. Services - Manager, Supply Chain - Supervisor(s), Lines - Supervisor, Stations - Supervisor, System Control

Note: The ERP Planning Committee is responsible for developing, maintaining, and updating the ERP and all appendices.

See Appendix 09 for the ERP Organizational Chart.

Part 2 – Emergency Definitions and Criteria for an Emergency

2.1 Definition of Emergency

Emergency, for the purpose of this ERP, is defined as a power disruption or loss of supply on the local distribution system, threats to human life, pandemic or any risks defined in the risk assessment. (See Appendix 11)

2.2 Acronyms

CCP	Crisis Communication Plan
DACS	Data Acquisition System
EAP	Employee Assistance Program
ECG	Emergency Control Group
EDA	Electricity Distributors Association
ESA	Electrical Safety Authority
EMC	Emergency Management Coordinator
ERP	Emergency Response Plan
EOC	Emergency Operations Centre
HSEMS	Health, Safety & Environmental Management System
IESO	Independent Electricity System Operator
LDC's	Local Distribution Companies
ONMAG	Ontario Mutual Assistance Group

2.3 Risk Assessment

An assessment of all hazards that may have a substantial effect on Burlington Hydro's electricity distribution system, company assets or employees must be completed. A risk assessment will be done, by the ERP Planning Committee, on an annual basis to determine if any additional planned responses need to be developed to deal with other emergencies not currently part of the ERP. (Refer to Appendix 11)

The hazards are divided between natural and human-caused events.
- Natural events that may occur and have a severe effect include ice storms, windstorms, lightning storms, earthquakes, tornadoes, forest fires and floods.
- Human-caused events include vandalism, civil unrest, hazardous chemical spills, fuel shortages, transportation disruption, technological failures, and supply shortages.

The Emergency Control Group will have the flexibility to adjust this ERP and its associated procedures to the unique characteristics of each emergency.

2.4 Emergency Scenarios

As determined by the risk assessment:
- Power disruption or Loss of Supply (Distribution System)
- Pandemic
- Active Attacker (Office or Field)
- Bomb threat
- Hazardous material release or exposure
- 1340 Brant St. is Unavailable to Occupants
- IT Disasters

Note: Smoke or Fire is handled through the approved Fire Safety Plan.

2.5 Criteria for Determining an Emergency

The criteria that may form part of the decision as to whether an emergency exists are:

- Serious Electrical contact incident
- The cause of an outage (i.e., storm situation causing widespread outage and likelihood of long duration versus a problem that can be sectionalized and restored in a few hours).
- Number of customers affected, time of day, temperature, weather conditions.
- Critical nature of customers or operations affected (i.e., hospitals, customers on life support, nursing homes, water pumping stations, sewage treatment plants, transportation authorities, or airports). (See Appendix 02 - Priority List - Critical Customers).
- Predicted Severe Weather Event forecast
- Potential of economic loss to customers who are sensitive to outages of a particular duration (i.e., customers in process industries such as steel, glass, paint or automotive, or in sensitive agricultural operations).
- Loss of load and estimated duration of outage. The following load loss and outage duration scenarios could be used in determining emergencies:
    - 1,000 or more customers or more expected to be off for greater than 12 hours
    - 10% or more of Customers affected by sustained outages
    - Loss of Supply for sustained periods
    - Outages affecting multiple feeders for sustained periods (greater than 12 hours)

Part 3 – Emergency Notification System

3.1 Pre-emergency Response

3.1.1 Identifying Power System Problems

Data Acquisition System (DACS) alarms, no power calls and reports of lines down are the usual first indicators of an actual power emergency. In a situation where many no power calls are received from diverse parts of the City, individual radio equipped spotters may be dispatched by the Electrical Operator Supervisor or the Line Supervisor, as required. The Director, Operations and/or Director, Engineering should be contacted at this point as well. They will determine if the damaged area should be assessed further. Subsequent visual confirmation by Burlington Hydro personnel, of reported problems, should take place.

3.1.2 Identifying Other Emergencies

All non-distribution system emergencies could be identified by anyone at Burlington Hydro. For emergencies other than "power system problems" the "Emergency Phone Alert System" should be used. There are specific Colour Codes and emergency procedures for each scenario. See Appendix 06, 14, 15, 16, 17 and 18 for details.

3.1.3 Assessing the Damage Area (Power System Emergencies)

To help assess the area, a Site Coordinator will be appointed (e.g., Lines Supervisor/Lead Hand) by the Emergency Control Group and be directed to the emergency scene. This person should be equipped with a portable radio, cellular phone or satellite phone.

The Site Coordinator will survey the emergency area, on foot if necessary, and record the nature and extent of the damage in terms of:
- Specific location (street address and visible landmarks)
- Lines down (poles down)
- Are public rights of way blocked?
- Is anyone trapped?
- Do people need to be advised to stay in vehicles or homes?
- Do people need to be advised to stay clear of energized equipment?
- Is any form of access possible (a best route)?
- Do the police, fire department, or ambulance service need to be on the scene?
- All information is to be reported to the Operations Coordinator or Emergency Control Group immediately

It is stressed that this initial survey is to establish key parameters only. This will allow such decisions as:
- Does the area need immediate attention?
- Do we need to isolate or de-energize feeders?
- Does the area need to be cordoned off?
- Can sectionalizing be performed to reduce the outage area?

In this initial survey, as much information as possible should be obtained to assist the Emergency Control Group in making an appropriate decision.

3.1.4 Action Prior to Declaration of an Emergency

When an emergency exists but has not yet been declared, employees may take action, under this ERP, that may be required to restore power, protect lives and property at the emergency site.

3.1.5. Secure Damaged Area (Power System Emergencies)

The need to safeguard the public is to be recognized. The first responsibility is to complete the safe and speedy removal of injured people in the damage area. The area of damage must be cordoned off, by whatever reasonable means, to prevent inadvertent access to, or contact with, energized lines or equipment. When the emergency involves distribution system equipment, we must assume that the equipment is still energized or may be re-energized at any time.

3.1.6 Isolate the Damage Area (Power System Emergencies)

Appropriate steps will be taken to isolate the damage to facilitate power restoration.

3.2 Emergency Notification

Emergency Notification can happen different ways, depending on the emergency:
- For non-immediate notification response emergencies (power disruption, loss of supply, pandemic, IT disaster), upon receipt of a warning of a real or potential emergency, the responding department will immediately contact the Emergency Coordinator, or their alternate, to notify them of the emergency.
- For immediate notification response emergencies (attacker, bomb, hazardous material release), upon becoming aware of the emergency, any employee must activate the Emergency Phone Alert System with the appropriate colour code.

3.3 Meeting of the Emergency Control Group

After an emergency has been identified and declared, the Emergency Coordinator will convene a meeting of the Emergency Control Group. The purpose of this meeting will be to review and evaluate available information, and depending on the situation, determine what course of action is most feasible and appropriate.

Depending on the emergency, some of the communications listed below should be set in motion before an emergency has been declared:
- Police Department to block roads, direct traffic, coordinate press releases or respond to other emergencies
- Fire Department and Ambulance Services respond to an emergency
- Public Works Traffic Departments for assistance to barricade roads, for spare barricades and emergency lights
- City of Burlington - Emergency Management Coordinator (EMC)
- Ontario Mutual Assistance Group (ONMAG), Hydro One
- Electricity Distributors Association (EDA)
- Electrical Safety Authority (ESA)
- Arrangements to enable after hours telephones and the Storm Room, as appropriate
- Advise Information Services within 15 minutes if power to Burlington Facility is to be off
- Radio stations and Media messages to make announcements and to keep them advised

3.4 Declaration of an Emergency

After consultation with the Emergency Control Group, it will be the responsibility of the Emergency Coordinator to determine whether the urgent situation will be declared an emergency. The Emergency Coordinator will advise the President/CEO. The declaration of an emergency shall be the sole responsibility of the President/CEO.

Upon declaration, the Emergency Coordinator will notify, as appropriate:
- Board of Directors
- Burlington Hydro Staff
- Region of Halton
- City of Burlington
- Other Utilities
- Agencies
- The public

Part 4 – Emergency Control Group and Support Group Responsibilities

4.1 Emergency Coordinator Responsibilities

The Emergency Coordinator is responsible for the overall coordination of activities during the emergency. The VP Engineering Services & Network Operations will act as the Emergency Coordinator. The alternate Emergency Coordinator is the Director, Engineering or the Director, Operations.

Emergency Coordinator position has the responsibility to:
- Gain an overview of the total situation and assess overall operations
- Advise the President/CEO as to whether the declaration of an emergency is necessary
- Coordinate and communicate information to customers, media, management and the City of
- Burlington
- Direct the operations of the Emergency Control Group.

For Power Outages:
- Establish priorities and coordinate the overall restoration effort, liaising with and through the communications, operations, and system coordinators
- Organize workforces, secure the required outside assistance (staff, transport, work equipment and material) and direct them to locations which demand the greatest assistance
- Prioritize power restoration according to critical customer list (See Appendix 02 – Priority List – Critical Customers)
- Maintain radio communication with field operations
- Provide food and arrange accommodation for the workforces
- Keep track of individual time sheets, and assign and record transportation of material
- Provide telephone answering service
- Oversee vehicle maintenance
- Obtain and control material
- Coordinate and communicate information to customers, media, management and the City of
- Burlington
- Coordinate and communicate with Hydro One or other Utility emergency operations

Many of the above functions will be delegated, as staff becomes available during the emergency. The Emergency Coordinator will be in charge of all total aspects of the emergency. The Emergency Coordinator will manage the system resources, analyze information, and make decisions in the emergency with positive direction and control. The Emergency Coordinator will manage the emergency from the Emergency Operations Centre (EOC).

4.2 Emergency Control Group (ECG) Responsibilities

- Determining if the location and composition of the ECG are appropriate
- Ordering, coordinating and/or overseeing the evacuation of inhabitants considered being in danger, if required.
- Designating any area in the city as an "emergency area"
- Determine if additional assistance from and/or liaison with outside agencies, utilities, the City of Burlington as necessary.
- Ensuring the pertinent information regarding the emergency is promptly forwarded to the media and public.
- Authorize the expenditures of monies required to deal with the emergency.
- Advising the termination of the emergency
- Maintaining a log outlining decision made and actions taken and submitting a summary of the log to the ERP Planning Committee after the termination of the emergency.
- Participating in debriefing following the emergency.

The Emergency Control group will be directly accountable to the Emergency Coordinator during activation of the ERP.

4.3 Emergency Support Group Responsibilities

The Emergency Support group will be directly accountable to the Emergency Control Group during activation of the ERP.

4.4 Operations Coordinator Responsibilities

The Emergency Coordinator will direct operations through the Operations Coordinator who is responsible for ensuring that any outside crews are effectively deployed and that the needed support services and materials are available during the emergency. The Director, Network Operating will act as the Operations Coordinator. In their absence one of the Line Supervisors will act as Operations Coordinator.

The Operations Coordinator has responsibility to:
- Assist the ECG to gain an overview of the total situation and assess overall operations
- Assist the ECG to establish priorities and coordinate the overall restoration effort
- Recommend Site Coordinator to assess, secure and isolate damage area
- Supervise the role of Site Coordinator
- Organize workforces, secure the required outside assistance (staff, transport, work equipment and material) and direct them to locations which demand the greatest assistance
- Maintain radio communication with field operations
- Provide food and arrange accommodation for the workforces
- Keep track of individual time sheets, and assign and record transportation of material
- Oversee vehicle maintenance
- Liaise with Supply Chair to obtain and control material

4.5 System Coordinator Responsibilities

The Operations Coordinator will direct systems coordination through the Systems Coordinator, who is responsible for recognizing and reporting the extent and magnitude of the emergency. They will also ensure that power be restored to the affected distribution system by sectionalizing and switching; to restore power to as many customers as possible, in the shortest time possible, while prioritizing power restoration to critical customers first. The Supervisor, Control Room will act as the Systems Coordinator.

The Systems Coordinator position has responsibility to:
- Assist the ECG to gain an overview of the total situation and assess overall operations
- Assist the ECG to establish priorities and coordinate the overall restoration effort
- Prioritize power restoration to critical customers (See Appendix 01 Critical Customers List)
- Maintain radio communication with field operations
- Direct the role of the System Dispatcher

4.6 Communications Coordinator Responsibilities

The Communications Coordinator is responsible for coordinating and communicating pertinent information to all stakeholders. The EVP, Corporate, and CPO will act as Communications Coordinator. In their absence the Director, Communications will act as the Communications Coordinator. The Crisis Communication Plan (CCP) covers critical communication procedures during an emergency. Refer to the CCP in Appendix 22.

The Communications Coordinator position has responsibility to:
- Assist the Emergency Coordinator to gain an overview of the total situation and assess overall operations
- Coordinate and communicate information to customers, media, and senior management
- Arrange for an area to gather members of the media to issue accurate media releases and instructions to the public
- Deal with management, Board of Directors, politicians, customers, and the media to avoid confusing and conflicting reports throughout the emergency
- Maintain copies of media releases and newspaper articles pertaining to the emergency
- Receive information from the systems and operations group through the Emergency Coordinator and from the phone centre staff.
- Help to ensure the timely flow of pertinent information to the appropriate parties.

Part 5 – Emergency Operations Centre Function

5.1 Emergency Operations Centre

There are four possible options for the Emergency Operations Centre (EOC):

1. Primary EOC: Training Centre on the ground floor. If the primary EOC is not available or inaccessible:
2. Alternate EOC: Mainway Recreation Centre (4015 Mainway, Burlington, Ontario). See Section 5.9.
3. Virtual on Teams
4. Hybrid Option, when not everyone can get to the Alternate EOC.

The Emergency Operations Centre is where the Emergency Control Group, Support Group, and any other required support personnel will congregate, work together, share information, support emergency response operations at the emergency site, and ensure that appropriate emergency services provisions are maintained outside, and apart from the emergency site. The Emergency Coordinator is responsible for coordinating all operations within the Emergency Operations Centre.

The Emergency Control Group will meet in the EOC.

5.2 EOC Resources (Primary and Alternate)

Primary EOC – Training Centre		Alternate EOC – Mainway	
Item:	Specific Location:	Item:	Specific Location:
EOC Kit	Training Centre Credenza	EOC Kit	EOC Storage Room
AV Equipment	Training Centre - built in	AV Equipment	Conf. Room – Built In
White Board	Training Centre	White Board	Conf. Room
HDMI Cable	Training Centre – built in	HDMI Cable	EOC Kit
ERP binder	ERP members	ERP binder	EOC Kit
White Board Markers	EOC Kit	White Board Markers	EOC kit
Paper and pens	EOC Kit	Paper and pens	EOC Kit
Various office supplies	EOC Kit	Various Office Supplies	EOC Kit
Road map	EOC Kit	Road Maps	EOC Kit
Extension Cords	EOC Kit	Extension Cords	EOC Kit
Building drawings	USB in EOC Kit	Building drawings	NA
System drawings	EOC Kit	System drawing	EOC Kit
Telephone Directories	ERP appendix's	Telephone Directories	ERP Appendix's
Laptops	All ERP members	Laptops	All ERP members
Laptop Power Cords	IT to supply, as required	Laptop Power Cords	IT to supply, as required
Power Receptacles	Training Centre	Power Receptacles	Conf. Room
Washroom, kitchen	On site	Washroom, kitchen	On site
Secondary Room	2nd Floor Board Room	Secondary Room	Lobby Office
First Aid Supplies	On site	First Aid Supplies	Lobby Office
Adequate Parking	North Parking Lot	Adequate Parking	East Parking Lot
Media /Press Conf. Area	Mountainside Conf. Room	Media/Press Conf. Area	Lobby
Backup Power Supply	Generator	Backup Power Supply	Generator

5.3 Additional rooms designated for Emergency Operations purposes:

Room	Function
Orchard Room	Emergency Support Group
Control Room	Systems Coordinator
Cedar Springs Room	Operations Coordinator
Mountainside Conf. Room	Media and Press Area
Billing Area	Phone Centre
Lunchroom (ground floor)	Emergency Lounge Area

5.4 Emergency Control Group Meetings

- It is essential that the Emergency Control Group Members meet on a regular basis during the emergency to share information, identify actions, and set priorities.
- The meeting will be scheduled and chaired by the Emergency Coordinator on a regular rotation.
- This will allow time between meetings for Emergency Control Group members to deal with their individual responsibilities.
- When a meeting is called, all Emergency Control Group members will attend the meeting and briefly update the group on the actions of their respective departments, identify issues needing resolution and seek input from the group as a whole.
- All Emergency Control Group Members must be present at each meeting to hear reports and give reports. .

5.5 Emergency Support Group Meetings

- While the Emergency Control Group is engaged in meetings, they will require the Emergency Support Group to collect information, relay information, conduct office support functions and convey decisions/actions taken to the Emergency Control Group members.
- Therefore, the Emergency Support Group Meeting room must be in close proximity to the Emergency Control Group Meeting Room. The Orchard Room has been designated as the Emergency Support Group meeting Room.
- In the event that the Orchard Room is not available, the Emergency Support group will meet virtually on Teams.

5.6 Media and Press Conf. Room

To restrict access of the Media and the Public to the day-to-day operations of the building, the Communications Coordinator and Communications staff have been provided the Mountain Side Conf. Room for conducting Press Conferences.

5.7 System Control Emergency Operations (incl. Back Up)

The Systems Coordinator and the System Dispatcher will conduct their designated functions from the Burlington Hydro Control Room or the Alternate Control Room located at Palmer Station.

Control Room
Head Office
1340 Brant St.
Burlington, ON L7R 3Z7
Direct Line: (905) 336-2004
Cell: (905) 220-1386

Alternate Control Room Site:
Palmer Station
1386 Walkers Line
Burlington, ON
Direct Line: (905) 336-8839
Cell: (905) 220-1386

A contingency plan has been developed in the event the Control Room becomes inoperable, destroyed or inaccessible. The alternate site for the Control Room will be at the Palmer Substation on Walkers Line, Burlington. There is also a SCADA master computer installed at Milton Hydro, with a workstation set up that allows us to operate the BHI system from the Milton Hydro facility. Also, with fibre wire SCADA communications installed to 32 of 32 distribution stations, the system could be operated from any one of these 32 stations.

If the Emergency is going to be for a considerable length of time, then Bell Canada should be contacted to bring in more telephone lines. These telephone numbers will have to be given to staff and be made available to the public using the Public Radio and Television Stations.

If the Palmer site is going to be used as a recovery site, then a portable washroom should be installed at the site and bottled water brought in for the Staff there.

This site has a standby power supply (to be installed September 2000) as well as a radio setup permanently in the substation. This site also houses the safe that keeps all the utilities backup tapes for the AS400, AM/FM, SCADA, and meter information. There is also a set of maps kept at this location. All of this information will help us start to recover from the emergency. The vault that these backups are kept in the Southwest corner of the inside of the substation, with only Information Services (IS) staff having the combination. Staff at the recovery site will need paper and writing instruments to keep records and information. Some of the supplies, forms and reports are stored off site at the Palmer Station. There is also data and record information stored on the backup tape from the Control Room PC that is in the safe with the other backup tapes. (Note: these backup tapes were made using a Ditto 3200 tape drive running Iomega 3200NT Ditto software.)

If there is a declared emergency, Control Room operators and other support staff may be contacted to go to the Palmer Site. Senior supervisory staff should take charge and start to contact other staff *as* needed.

If the Control Room is still functional but inaccessible, the SCADA system can be accessed from a remote location (Palmer Substation) by dial up method. An Alpha computer with enough speed and capacity will be at the disaster recovery site and can be used to get information from the SCADA system and have some control and monitoring of the substations.

If the existing SCADA system is destroyed or non-functional, there are two terminal servers and modem cards located at the disaster recovery site that could be used with Quindars assistance to make contact to our substations and devices. There would be a need to acquire a Digital Alpha Computer of sufficient size and speed to be used as a master station. Additional telephone lines or switching may be required.

5.8 Outside Assistance Support Staff Area

The Operations Coordinator and their staff will conduct their designated functions from the Burlington Hydro Service Center. All outside assistance support staff are to report to this area. The ground floor lunchroom has been designated as the emergency lounge and eating area for emergency staff and outside assistance support staff.

5.9 Alternate Emergency Operations Centre

It is possible that the Emergency Operations Centre could be directly affected by the emergency itself. Therefore, an alternate Emergency Operations Centre must be always available. The Primary EOC will always be the preferred location with an Alternate EOC as a backup.

In the event that the Primary EOC cannot be used, there are three possible options for the Emergency Operations Centre (EOC):

1. Alternate EOC: Mainway Recreation Centre (4015 Mainway, Burlington, Ontario)
2. Virtual on Teams
3. Hybrid Option, when not everyone can get to the Alternate EOC.

See Appendix 10 for Alternate EOC Details.

5.10 Information Services Back Up Centre

Refer to the Corporate Disaster Recovery and Business Continuity Plan (Information Technology) for details.

Part 6 – Emergency Support Staff Responsibilities

Operations Coordinator - The following support staff will fall under the responsibility of the Operations Coordinator.

6.1 Site Coordinator

Reporting to the Operations Coordinator, the Site Coordinator is responsible for assessing the damage area. They are also responsible for securing, isolating, and supervising the damage area as discussed in Part 3, section 1.2. A Line Supervisor will act as the Site Coordinator.

The Site Coordinator is responsible for:
- Ensuring that priorities, tasks, and tactics have been established to contain the problem.
- Ensuring that outside assistance personnel are aware of human and material resources that are available to mitigate the emergency.
- Ensuring the needs of the outside utility crews are met, with regards to stress, fatigue, food, shelter, and relief.
- Communicate material shortages to Supply Chain.
- Monitoring the operation of the emergency site and make suggestions, where appropriate.
- Exercising foresight as to future events in the management of the emergency such as resource requirements, weather, lighting, etc.
- Understanding laws and policies that must be taken into consideration during the restoration effort.
- Understanding that outside of the emergency site, the Emergency Control Group is managing the day-to-day operations of Burlington Hydro.

The Site Coordinator will report directly to the Operations Coordinator, which will in turn, report any information to the Emergency Control Group.

6.2 Lines Personnel

The main task of Lines personnel will be to restore service as expeditiously as possible. Communications with the Control Room regarding distribution system status must be maintained. Where temporary repairs have been completed, records must be kept facilitating future permanent repairs. As far as practical, major tree cutting, clearing and City crews or tree contractors will handle removals.

Pole holes should be excavated using vacuum excavation, where possible. This will reduce the risk to underground facilities.

6.3 Stations Maintenance and Metering Personnel

Will be available to assist and arrange for:
- Act as spotters and investigate trouble calls
- Emergency lighting in conjunction with portable generators
- Connecting portable generators to assist customers in critical situations only and only as far as it is practical and feasible. In all cases, they will ensure that no back feed is possible on our lines.
- Troubleshoot failures that occur on the radio systems or DACS equipment
- Any electrical repairs or component replacement that might be required to re-establish electrical service
- The pick-up and delivery of materials required at job sites (pole line hardware, transformers, meters, etc.)

Station Maintenance and P&C staff may be utilized in various ways during a disaster. Some staff may be needed to assist the Operations group in controlling substation functions and verifying conditions until monitoring can be re-established.

Stations Maintenance department will:

- Deal with any substation problems and making sure that substations are functioning the best they can during the emergency.
- Ensure that radio communications are up and working. This may necessitate generators and other equipment being installed and maintained at the radio tower, Control Room or at Palmer Station.

- If the Service Center is destroyed or inaccessible, then Station Maintenance staff may be required to use their own vehicles while renting of appropriate vehicles is arranged for.
- Common tools such as wrenches, pliers, etc. may be required to do emergency repairs during this time. Local suppliers of such equipment may need to be contacted and a request of staff to use some of their own tools may also be helpful.
- Specialized equipment and supplies may require borrowing from other utilities or contacting suppliers for emergency replacements. Vehicles can be rented from Budget. Discount, etc.
- Station Maintenance staff can be utilized in other areas of the Utility if need be. There are licensed electricians on staff and some people with line and underground knowledge that could assist where needed.

Station Maintenance and P&C staff may be utilized in various ways during a disaster. Some staff may be needed to assist the Operations group in controlling substation functions and verifying conditions until monitoring can be re-established.

Metering Operations will:

Currently maintaining a Bi-weekly CD backup. This backup contains all operations files in MV-90 which are rotated by-monthly at Palmer Station. Each CD contains all data current and archives.

6.4 Contractors, other Utility Crews

Will report to the Lines Service Centre and provide assistance where needed. See Appendix 16 – Ontario Mutual Assistance Group (ONMAG) Guideline.

Systems Coordinator - The following support staff will fall under the responsibility of the System Coordinator.

6.5 Electrical Operator (System Dispatcher) and Control Room

Electrical Operators and the System Coordinator, or other designated personnel, who are familiar with the distribution system, switching procedures and Utility Work Protection Code, will staff the Control Room. They will direct and document all switching operations. As required, depending on the emergency, the Alternate Control Room located at Palmer Station will be used.

6.6 Spotters

- From the Engineering Department and include Technicians and Supervisory Staff
- Will be assisted by drivers who will also come from the Engineering Department

6.7 Engineering

Engineering and locating staff may be critical during the outage because of their knowledge of maps and technical specifications of equipment. Quick access to maps is critical in assisting the crews in locating equipment in the field. In some cases, equipment may have to be substituted for equipment,
which has been damaged, and specifications may have to be checked with Engineering. It is important that Engineering keep records of what has been done in the field so those temporary repairs can be made permanent later. Cable locating crews must be available and dispatched quickly to areas where underground systems have failed. Their knowledge of maps and streets can also be useful when performing the duties of the temporary sorters of trouble orders, if required.

Engineering will be available as a support group for the following tasks:
- Ensure the yearly Work Order (s) to accumulate Capital Costs if required (normal storm damage will be covered under Operations and Maintenance (O&M) work orders) is used.
- Make recommendations regarding the following:
  - Do we put back what was there in the same configuration?

- Do we re-insulate for higher voltages?
- Do we need to build temporary lines to permit more extensive reconstruction?
- Do we need to consider a new alignment?
- Do we pull the old pole and plant the new pole in its place, or do we need to place the new pole adjacent to the old?
- Coordinate communications with other affected utilities; Bell Canada, Ministry of Transportation, City Works Department, Union Gas, etc.

6.8 Inspectors/Technicians

Will be involved in:
- Stakeouts of new poles and anchor locations
- Acquiring emergency temporary easements for guys, etc.
- Procuring locates from other utilities
- Arranging for permits from the City of Burlington

6.9 Drafting Personnel

May become involved in varied duties to go along with their traditional roles:
- Prepare prints as required
- Collect field notes in preparation for drawing revisions
- Be assigned to telephone answering duties
- Be messengers to pick up items as required
- Drivers to assist spotters

Other Support Groups

6.10 Supply Chain

Under the emergency conditions where large quantities of material are required, the Supply Chain department will assume the following duties:
- Anticipate the shortage of certain types of material at the beginning of the emergency and procure needed material from suppliers, other LDC's and Contractors.
- Identify future material requirements. As a storm progresses, the emphasis will change from one item to another. Be aware of what is happening in the field.
- Arrange to provide vehicles for material delivery to field locations, if requested. This is an area where in many cases, for small materials, anyone with a driver's license can drive a small truck to deliver materials.
- Organize Supply Chain employees to work in shifts if the emergency is anticipated to last past regular working hours.
- Arrange for food and refreshments as directed.

NOTE: Food orders require advance notice. It is necessary to plan ahead. Contact the CFO for access to the corporate credit card.

6.11 Stores

Will assist in:
- Booking material out and in
- Picking up material and making deliveries
- Fueling of non-BHI vehicles at the Burlington Hydro Service Centre.

See Appendix 24 for Stores Emergency Contact Procedure.

6.12 Communications

The Crisis Communication Plan (CCP) covers critical communication procedures during an emergency. Refer to the CCP in Appendix 22.

Corporate Communications will be responsible for all public communications:
- Act as company spokes person
- Issuance of media releases and coordination of media interviews]
- Social media posts
- Website posts – homepage will convert to 'emergency mode' to allow for easy access to the latest information on the emergency (will work closely with the website consultant)

6.13 Telephone Response System and Staff duties (Phone centre)

The telephone response system and duties will be the responsibility of the Manager, Customer Accounts.

The telephone response system and staff duties will vary greatly, depending on the time that the emergency is initiated. If it occurs during regular business hours, there is usually many staff available to assist in the emergency. If it occurs outside of Burlington Hydro's business hours, it is often staff that is unfamiliar with the system that must answer the telephones. Documented instructions for the phone system are available in the Control Room to help those who are unfamiliar with the system.

The following staff may be called to provide assistance to the telephone response system:
- Customer Accounts Department and Billing (which includes, Customer Service Clerks, Cashiers, Billing Clerks, Floaters and Collections Clerks)

Additional help may be required from the Information Services, Accounting, Regulatory, Supply Chain, Capital Planning and Engineering Departments.

Staff duties during the emergency include writing trouble orders from customers and responding to customer concerns.

6.14 Director, Health & Safety

May be designated to:
- Act as liaison with other disaster agencies: Police, Fire, Public Works, etc.
- Provide assistance in the field as required.
- Monitor the emergency as it progresses and be available if any safety concerns arise, in particular, if staff from other utilities is involved in the emergency.
- For establishing due diligence, review other utilities' staff qualifications before allowing them to work on the electrical system.

6.15 Director, Human Resources

The Director, Human Resources will have the responsibility to assist the Emergency Control Group in acquiring additional human resources requirements.

6.15.1 Counselling Support Services

Burlington Hydro has arrangements through our Employee Assistance Program (EAP) to help counsel any worker needing assistance. Depending on the situation, EAP may provide assistance on site. Employees are also encouraged to meet with EAP counselors, which is something they can arrange themselves, or through the HR Department.

Family Support

It is also recognized that Burlington Hydro employees have substantial commitments to their families, especially during a major emergency or disaster. In order that employees may attend to Burlington Hydro's needs during a declared emergency or disaster, the Human Resources department or an appointed Family Support Coordinator will arrange for appropriate assistance for employees' families, as required, such as:

- Lodging and food, if their home is damaged
- Transportation to a place of safety (Either the Service Centre or other appropriate location)
- Medical care
- Communications arrangements

6.16 Information Technology Department

The Information Services Department should be available to:
- Ensure that adequate supplies are provided to emergency personnel such as computers, equipment etc.
- Provide assistance where needed.

Part 7 – Termination of Emergency

7.1 Declaring Termination of the Emergency

After consultation with the Emergency Control Group, it will be the responsibility of the Emergency Coordinator to determine whether to terminate the emergency, when the situation is sufficiently under control. The Emergency Coordinator will advise the President/CEO. The termination of the emergency shall be the sole responsibility of the President/CEO.

If the Mayor of Burlington terminates an emergency, that involves Burlington Hydro, Burlington Hydro's emergency will not be considered terminated until deemed appropriate and terminated by the President/CEO.

Upon declaration of termination, the Emergency Coordinator will notify, as appropriate:
- Board of Directors
- Burlington Hydro Staff
- Region of Halton
- City of Burlington
- Other Utilities
- Agencies
- The public

7.2 Debriefing of Staff

Upon termination of the emergency, the Emergency Control Group will hold meetings with staff to determine areas of concern. All participants in the emergency will be included in the debriefing process.

Part 8 – ERP Plan Review, Testing, and Internal Procedures

8.1 Review Summary Report

Once the emergency has been terminated, everyone who had input and involvement in the emergency, must prepare a summary report addressed to the Emergency Coordinator. These summary reports are to highlight what happened and should provide a critical review on:

- Where can the plan be improved?
- What went wrong?
- What unforeseen events happened, that could be covered in the future?
- What went right?
- Any recommendations?
- Effect of the emergency plan?
- Was there department and personnel cooperation?

On receipt of all summary reports, the Emergency Coordinator will call a review meeting to discuss the recommendations and gather additional information. The Emergency Coordinator will prepare a report and arrange to have the emergency plan reviewed to correct any perceived deficiencies.

8.2 Audit and Assessment

- The Burlington Hydro Emergence Response Plan will be maintained by the ERP Planning Committee chaired by the Emergency Coordinator.
- The ERP will be reviewed annually and, where necessary, revised by the ERP Planning Committee. The updated ERP will be printed and distributed in accordance with the distribution list. See Appendix 12.
- Each time the ERP is substantially amended, it must be forwarded to the President/CEO for approval. However, minor editorial revisions and updates to maintain the currency of the plan can be made without resubmitting the plan to the President/CEO each time for approval.
- It is the responsibility of the ERP Planning Committee to ensure new directors and staff are briefed on the contents of the ERP, and to keep the Board of Directors apprised of emergency planning issues.
- It is the responsibility of each person, agency, service, or department named within this ERP to notify the ERP Planning Committee forthwith, of any revisions to the appendices or administrative changes.

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8.3 Testing of the ERP

The Burlington Hydro ERP Planning Committee will review and revise Burlington Hydro's Emergency Plan on an annual basis. The review will include contacting all individuals listed in the plan, ensuring all resources are available and up to date and inspecting the EOC Kit Contents.

An Emergency Response plan drill will be held yearly, using different scenarios each year.

As required, participate in any Independent Electricity System Operator (IESO) scheduled implementation and testing of the Ontario Electricity Emergency Plan. Coordinate with the IESO the development of and participation in system restoration drills and participate in any IESO-coordinated integrated and/or Restoration Exercises as determined by the IESO.

8.4 Training

All employees with a role in this plan will take part in yearly training on this plan and their role and responsibilities.
All employee at BHI will be made aware on the contents of this plan yearly, during safety meetings.