Reporting and Record-keeping Requirements (RRR) Consultation

Stakeholder Meeting

EB-2022-0267

November 23, 2022

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Land Acknowledgment

The Ontario Energy Board acknowledges that our headquarters in Toronto is located on the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples. This area is now home to many diverse First Nations, Inuit and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit.

We are grateful for the opportunity to gather and work on this land and recognize our shared responsibility to support and be good stewards of it.

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Agenda

1. RRR Overview
2. RRR Stewardship Program
3. RRR Open Data
4. Discussion + Survey Results

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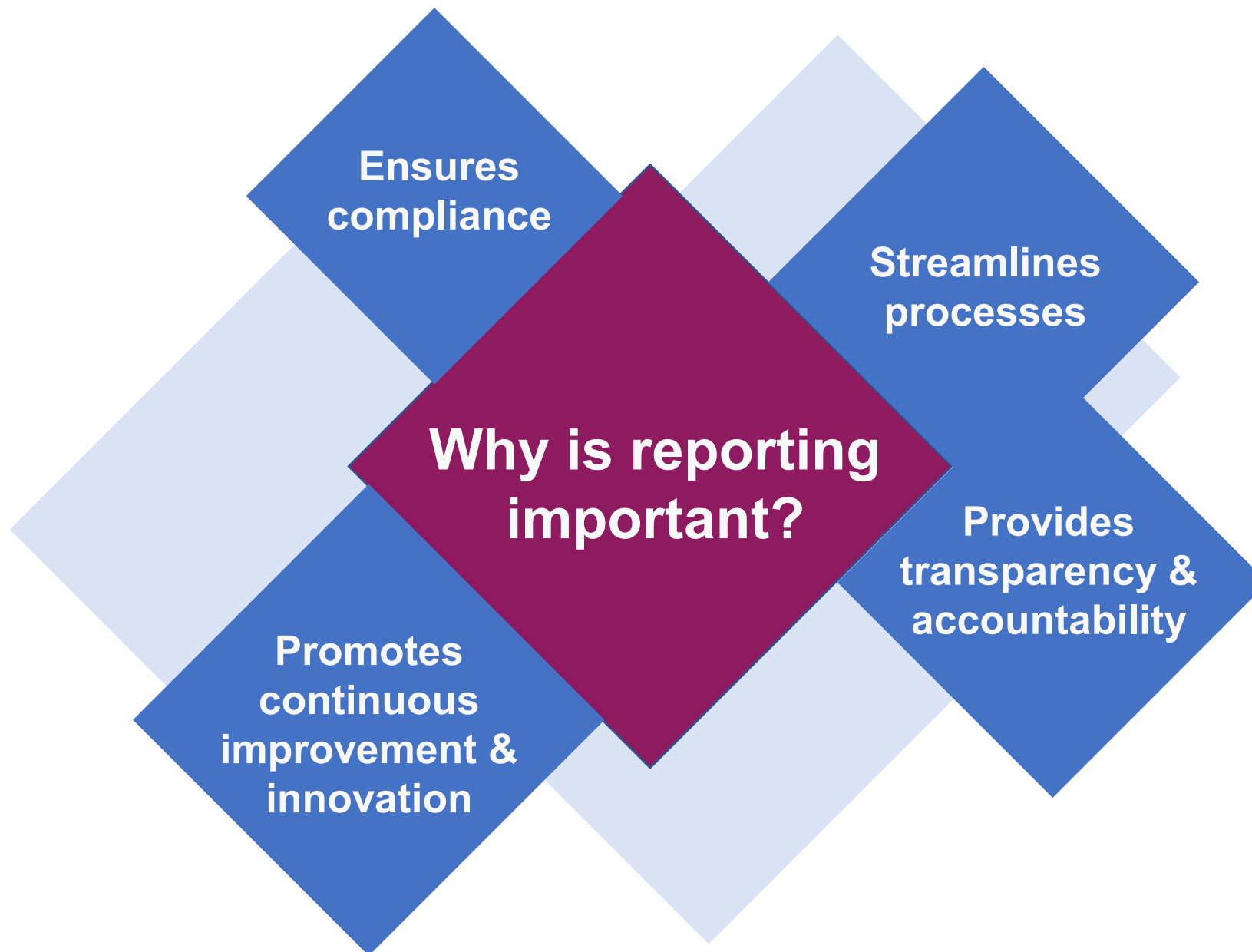BOARD

Purpose of Consultation

Share Information

- Provide stakeholders with overview of the internal RRR Stewardship Program, RRR improvements that have been implemented & upcoming RRR changes
- Share information about other RRR-related modernization activities such as RRR Open Data and the Infographic on RRR data uses

Gather stakeholder feedback

Gather stakeholder feedback on opportunities to streamline the data collected through RRR, improve the systems used to collect that data and consider new areas of interest for data collection

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Why is reporting important?

Ensures compliance

Streamlines processes

Promotes continuous improvement & innovation

Provides transparency & accountability

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Electricity RRR Overview

The [Electricity RRR](#) sets the minimum reporting and record keeping requirements with which electricity-related licensees (e.g., distributors, retailers, generators etc.) must comply. The focus of this consultation will be the Electricity RRR for Electricity Distributors.

The Electricity RRR was first established in 2002 from the OEB's Decision and Order [RP-2002-0140](#).

To aid electricity distributors in completing their filings, the OEB developed a [RRR Filing Guide](#) in 2012.

The Electricity RRR and RRR Filing Guide for Electricity Distributors are continuously amended and improved based on new decisions and orders, changes in legislation & the sector, as well as feedback from stakeholders.

> **Discussion**: Is the RRR Filing Guide a useful resource?

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Data Uses

The RRR is an important repository of financial and non-financial data the OEB needs to fulfil its regulatory mandate. The OEB is committed to ensuring that information collected through the RRR serves a purpose, whether it be for:

- Adjudicative Processes
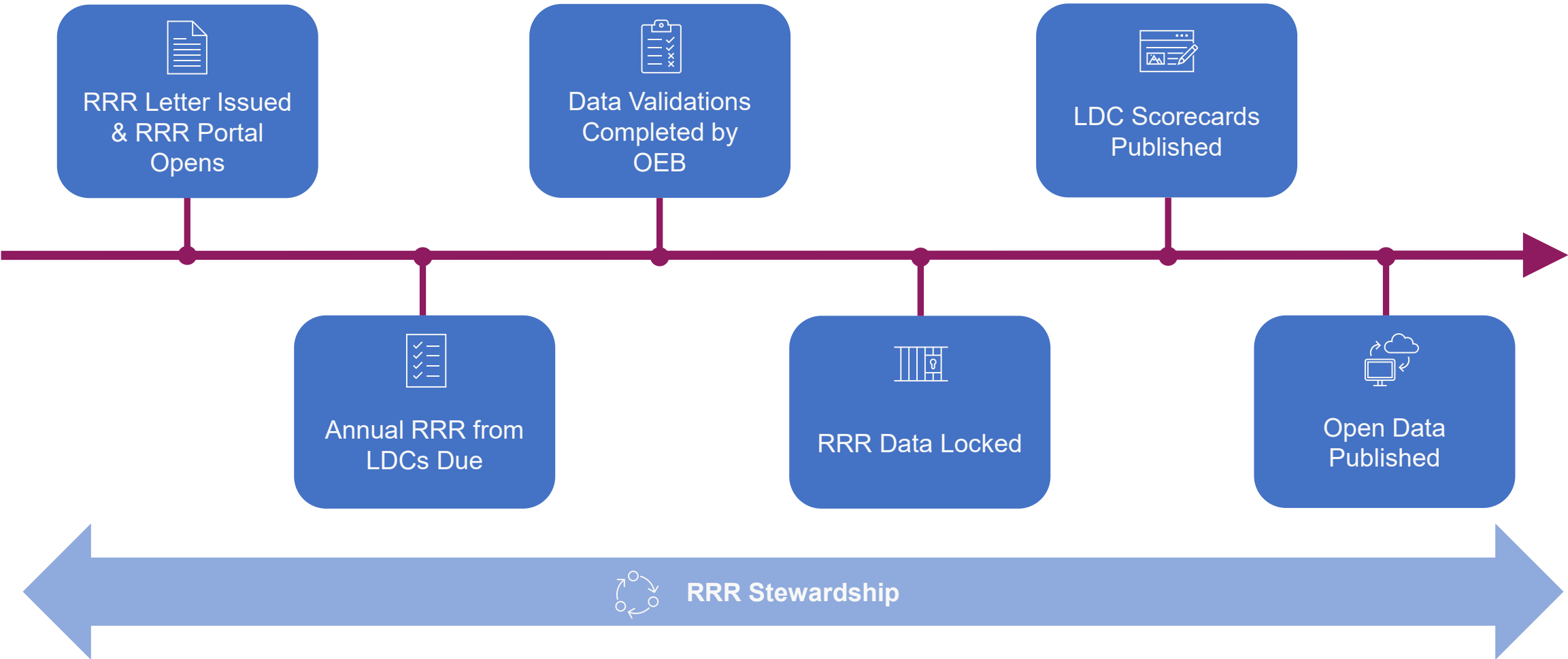- Monitoring
- Compliance

The OEB will continue to evolve the Infographic with more details on how RRR data is used.

HOW IS IT USED?

This graphic provides an at-a-glance overview of which OEB regulatory processes rely on which parts of RRR from electricity distributors. RRR data is used in many other regulatory activities and as an important input to monitoring and compliance activities.

	2.1.2 CUSTOMER NUMBERS	2.1.4 SERVICE QUALITY & RELIABILITY	2.1.5.2 CAPITAL	2.1.5.4 ENERGY CONSUMPTION, DEMAND & REVENUE	2.1.5.5 UTILITY CHARACTERISTICS	2.1.5.6 RETURN ON EQUITY	2.1.6 AUDITED FINANCIAL STATEMENTS	2.1.7 TRIAL BALANCE	2.1.8 ELIGIBLE LOW INCOME CUSTOMERS	2.1.9 ONTARIO ELECTRICITY SUPPORT PROGRAM (OESP)	2.1.14 NET METERING	2.1.16 LOW-INCOME ENERGY ASSISTANCE (LEAP)	2.1.19 SCORECARD METRICS	2.1.20-21 PUBLICLY TRADED SECURITIES	2.1.22 CYBER SECURITY READINESS
Total Cost Benchmarking	✓		✓	✓	✓			✓							
LDC Scorecards	✓	✓			✓	✓							✓		
IRM Applications	✓			✓		✓	✓	✓							
Major Applications (COS, CIR)	✓			✓		✓	✓	✓							
Regulated Price Plan (RPP)	✓														
Vulnerable Energy Consumer Protection									✓	✓		✓			
Net Metering Program Assessment											✓				
Cyber Security Program Assessment															✓
OEB Corporate Functions	✓													✓	

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Electricity RRR Process

RRR Letter Issued & RRR Portal Opens

Data Validations Completed by OEB

LDC Scorecards Published

Annual RRR from LDCs Due

RRR Data Locked

Open Data Published

RRR Stewardship

November 23, 2022

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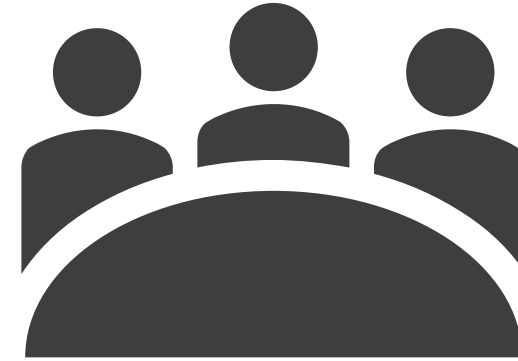# RRR Stewardship Program

The RRR Stewardship Program is run year-round at the OEB and brings together representatives from various internal OEB divisions to discuss and prioritize RRR-related changes.

The RRR Stewardship Program focuses on the following areas when considering a change:

Scope

Stakeholder Impacts

Implementation

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Implemented Improvements

Over the last couple years, the RRR Stewardship Program has been leveraged to implement several improvements to the Electricity RRR for licensed electricity distributors which included:

Eliminating reporting

- Examples include removal of RRR Sections 2.1.1, 2.1.15, 2.1.17 & 2.1.18 and changing RRR 2.1.2 from a quarterly to an annual filing

Streamlining reporting

- Examples include implementation of error proofing checks to minimize potential for errors in RRR submissions, introduction of CSV uploads, improved filing guidance and pre-population of Applications-related documents with relevant RRR data

Modernizing reporting

- Examples include introduction of a new RRR filing system and addition of RRR 2.1.5.8 to support the Activity & Program-based Benchmarking framework

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Upcoming Improvements

Improvements planned for April 2023 implementation

- Reducing RRR 2.1.4.1 reporting if annual targets are met
- Improving Scorecard approval process
- Adjusting filing lock dates during data validation process
- Error-proofing through auto-populating and auto-validating cells where appropriate
- Identifying cells that flag an error or have been auto-populated
- Improving filing guidance through updating RRR Document and Filing Guide

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Other Areas for Improvement

Areas being considered for future year improvements

- Expanding CSV file upload functionality and template use
- Reviewing RRR sections 2.1.2, 2.1.4 and 2.1.5 for efficiencies
- Reviewing LEAP & OESP reporting requirements

Items being explored by EDA

- Investigate Service Quality metrics for missed appointments and overlap with Ontario One Call
- Investigate supplementing 2.1.19 Public Safety metrics with ESA data

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Consultations

The RRR Stewardship team actively engages OEB staff leads about ongoing consultations that may result in recommendations to modify the RRR. The consultation recommendations would go through the RRR Stewardship Program process.

Current consultations:

- Reliability and Power Quality Review

- Distributed Energy Resources (DER) Connections Review

- Electric Vehicle Integration

- Activity & Program-based Benchmarking initiative

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RRR Open Data

As part of our modernization mandate and in accordance with Ontario's Digital and Data Directive, the OEB recently transitioned all non-confidential RRR data to an Open Data format – this can be found on the OEB's Open Data Webpage.

- The OEB is developing an Open Data Guide and planning to host a workshop to support users with importing and analyzing the Open Data files

- In the meantime, continue to contact PA&R (performance_reporting@oeb.ca) for support

Discussion: Feedback on Open Data Initiative? Are there other opportunities the OEB should explore in regards to Open Data?

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Discussion & Survey Results

Discussion – Question #1

Which section of the Electricity RRR for licensed electricity distributors do you see the most opportunity for improvement, either in terms of the data reported or the way in which it is collected in the portal?

- RRR 2.1.2 – Customer Information

- RRR 2.1.4 – Service Quality Metrics & Reliability

- RRR 2.1.5 – Labour, Supply, Delivery, Demand, Revenue, Utility Characteristics

- RRR 2.1.6, 2.1.7, 2.1.13 – Financial Data

- RRR 2.1.8, 2.1.9, 2.1.16 – Consumer Protection Data

- RRR 2.1.14 – Net Metering & Embedded Generation

- Electricity Utility Scorecards

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Survey Results – Question #1

COMMON RESPONSES

- Most selected responses in survey:

  - RRR 2.1.4 Service Quality Metrics & Reliability Data

  - RRR 2.1.5, 2.1.6, 2.1.7, 2.1.13 – Financial Data

- RRR 2.1.4 service quality metrics require a lot of time and effort for LDCs to track and review. Historically, LDC performance in meeting these targets has been strong and consistent.

  - OEB is progressing with reducing reporting for service quality metrics if target is met

  - **Discussion:** Should the SQ metrics as per the Distribution System Code (DSC) be reviewed? Could current metrics be modernized?

- Many RRR sections could benefit from an option for CSV uploads & templates

  - OEB to explore this for RRR 2.1.2, 2.1.5 & 2.1.13

  - **Discussion:** As per the Fiscal 2021 filing, 30% of LDCs used the CSV upload for 2.1.4 Cause Codes and 60% used the CSV upload for RRR 2.1.7 account balances. How can this be improved?

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Survey Results – Question #1

COMMON RESPONSES

- Changes to forms in RRR 2.1.7 should be released earlier to improve efficiency of collecting data internally

  - **Discussion**: When should these changes be communicated?

- Difficult to find errors in RRR 2.1.7

  - OEB to prioritize this section for error-proofing

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Discussion – Question #2

As the electricity sector evolves, are there new areas of interest that should be considered for RRR data collection from licensed electricity distributors? Please explain.

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Survey Results – Question #2

COMMON RESPONSES

- New RRR reporting should be necessary, well-defined, easy to track and balanced with regulatory burden

- To support LDC system planning and sector performance analysis, more granular data is needed on:

  - Embedded Generation & Net Metering (e.g., DER Connections)

  - External data related to Electric Vehicle (EV) placement, electrification of transportation, storage, DER service territories etc.

  - **Discussion**: OEB initiatives on DERs and EVs; what type of data is useful?

- More detailed data is needed for benchmarking

  - Activity & Program-based Benchmarking Consultation is taking place on November 30, 2022

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Discussion – Question #3

What type of insights do you look for from RRR data?

- Utility operational performance and/or benchmarking

- Utility financial performance and/or benchmarking

- Emerging trends in the electricity sector

- Consumer protection

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Survey Results – Question #3

COMMON RESPONSES

- Most selected responses:

  - Utility operational performance and/or benchmarking

  - Utility financial performance and/or benchmarking

  - Emerging trends in the electricity sector

- RRR data produces metrics that allows stakeholders to benchmark and evaluate performance of similar utilities – this is valuable for general business planning, evaluating sector performance etc. However, these metrics may not always be directly comparable as all utilities are different.

- Data helps inform policy

- Outputs of RRR filings (e.g., LDC scorecards) should be released earlier in the year

  - **Discussion**: Process timelines & dependencies

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Other general comments?

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Post-Consultation Survey

- Please complete the post-consultation survey that will be shared after today's meeting

- In particular, the OEB is looking to gauge whether there is interest in ongoing engagement with regards to RRR

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Thank you for participating!