



May 10, 2023

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
Toronto ON
M4P 1E4

Dear Ms. Marconi,

RE: EB-2023-0003 - Engagement on Distributor Resilience, Responsiveness and Cost Efficiency - CCMBC Suggestions

In its letter of May 3, 2023, the OEB invited interested parties to put forward suggestions by May 10, in advance of the meeting on May 17, on ways to assess restoration performance as a means of improving resilience in the distribution sector.

The letter indicated that meeting materials will aim to support discussion of the following questions:

- What are the criteria for good restoration performance?
- How can these criteria be measured efficiently?
- How should these measures inform expectations for electricity distributors?

The OEB stated in its letter that the ability to measure and set expectations for distributor performance in restoring service to customers after a high impact event is a valuable dimension of any resilience framework. Before considering the three questions that the OEB plans to discuss at the May 17 meeting, it should determine what it considers is **a high impact event**.

What are the criteria for good restoration performance?

The premise of the question may be based on assumptions are that all high impact events are equivalent, that they have equivalent impact on distributors' facilities, and that restoration efforts are equivalent. This is clearly not the case. OEB should first collect data on events such as type of event, duration of event, equipment damaged, number of customers affected, and time to restore service. This should be done over several years to develop baseline data. This would allow the OEB to define what is, and what is not, a high impact event. This could also be used to define what is good restoration performance and develop objective measurable criteria for it.

How can these criteria be measured efficiently?

Only after measurable criteria are developed and accepted by the distributors, methods of measuring the criteria can be discussed. There is a concern that the costs of measurement may be high if the criteria are difficult to measure.

How should these measures inform expectations for electricity distributors?

Since electricity distributors are not homogenous, it will be difficult to inform expectations for them. There is a concern that measures may lead to “one size fits all” expectations that could result in unintended consequences, such as trade off between safety and speed of restoration of service, or a quick fix and that may be costly in the long run. Measures and expectations should be discussed with electricity distributors and parties representing customer groups before any decisions are made.

Respectfully submitted on behalf of CCMBC,

Tom Ladanyi
Consultant representing CCMBC.

cc. Jocelyn Bamford (CCMBC)
Ashley Sanasie (OEB Staff)