
Subject: Questions regarding Electric System Limited - 2025 - 2029 Electricity Distribution Rates -OEB
File No. EB-2023-0195

Hi, as a rate payer served by overhead 4kv system I have the following concerns and would appreciate a discussion on the following issues during this rate application.

Some general questions.

1. Why are narrative drivers for spending segregated from other metrics?

Example if a Utility is claim aging assets require funding then why don't they provide other key metrics to support this.

Some examples:

1. Age of Assets verses SAIFI and SAIDI

- a. What percentage of assets at end of life contributed to SAIDI and SAIFI?
2. What percentage of assets with useful life contributed to SAIDI and SAIFI?

2. Asset Condition verses SAIFI and SAIDI

- a. What percentage of assets in very poor condition contributed to SAIDI and SAIFI?
- b. What percentage of assets in fair condition contributed to SAIDI and SAIFI?
- c. What percentage of assets in good to very good condition contributed to SAIDI and SAIFI?

Other questions and comments.

1. Why are rate classes assigned to just customer type? And not other considerations like configuration types such as; - overhead vs. Underground The utilities claim underground is more expensive then overhead . So why should a customer fed by overhead pay the same rates as underground customer?
2. Again as I mentioned before the system reliability numbers currently required by the regulator is very shallow and do not intersect with other key drivers of investment; such as; - equipment conditions - age of equipment - type of installation (example overhead vs. Underground) Why?
3. The Oeb requires utilities to conduct customer surveys yet why does the OEB not have a approval process on the content and structure of the survey? So as to ensure correct and accurate information is on that survey as not to mislead customers?
4. The Oeb requires utilities to provide investment information by specific types , during rate applications in there 5 year application. example such as underground. Yet no reliability info is asked for, historical and expected after the investment , why?
5. When utilities submit asset condition assessment of there assets they never submit a field audit portion as a supplement to the assessment, as to ensure that the audit portion correlates with the formulas in the asset condition assessment, why? In the first ACA that Kinectrics developed consisted of a formula that was heavily dependent on age and correlation with an actual field audit portion to ensure that the actual condition assessment had correlation to a real field audit. Another note why direct buried cable and cable in duct asset classes are not included in asset condition assessments?

Thou I understand spreading the rate costs over a service territory is considered by the OEB as a fairer approach it may in fact penalize customers who are served with inferior configuration types (example overhead vs underground). Your current approach is inadequate to really meet the needs of the customer who is constantly paying for underground of other areas. If a customer wants underground then they should pay for it not the entire customer rate class. I live a 4KV overhead area and the rates I pay keep funding direct buried underground into underground in duct. Could you please provide the SAIDI and SAIFI by system configuration?

Overhead

Underground:

- direct buried
- in duct

Stations

