

BY EMAIL AND RESS

January 17, 2025

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Marconi,

Re: EB-2021-0307 – Hydro One’s Response to Proposed DSC Amendment to Set Minimum Requirements for Customer Communication Regarding Interruptions and Restoration of Service following Severe Weather Events

On December 16, 2024, the Ontario Energy Board (OEB) issued a Notice of Proposal to amend the Distribution System Code (“DSC”) by adding a new Section 4.9 that will establish minimum requirements for communications by distributors to their customers in response to widespread power interruptions caused by a severe weather event affecting the distributor’s service area. Hydro One has reviewed the proposed amendments and provides the following comments for the OEB’s consideration:

1.0 Minimum Customer Communication Requirements for Severe Weather Events

a) Section 4.9.3

The OEB’s proposed Section 4.9.3 reads as follows:

“4.9.3 A distributor shall update the estimated time of restoration whenever there is a change to the previously provided estimate, which for clarity includes any instance where the actual restoration is delayed beyond the most recent estimate that was provided to customers.”

During a severe weather event, a situation could exist where the requirement to provide an update regarding the estimated time of restoration (“ETR”) would be unreasonable or simply cannot be determined at that time. Therefore, Hydro One recommends replacing “shall update” with “shall use its best efforts to update.” This change acknowledges the potential for circumstances, which are beyond the distributor’s control, that may prevent the distributor from providing an ETR update. The suggested change would also align with the proposed Section 4.9.1.

Hydro One also notes that sending updates reflecting a minor change to the restoration timeline estimate (i.e., five minutes) may not be practical or beneficial to the customer. Accordingly, Hydro One proposes that updates be sent only when a potential delay is 30 minutes or more.

In view of the above, Hydro One proposes the following changes to Section 4.9.3 denoted in bold:

*“A distributor **shall use its best efforts to update the estimated time of restoration whenever there is a change of 30 minutes or more to the previously provided estimate, which for clarity includes any instance where the actual restoration is delayed beyond the most recent estimate that was provided to customers.**”*

2.0 Additional Communication Requirements for Critical Customers

a) Revised Definition of Critical Customers

The OEB has proposed changes to Section 4.5.7 in the DSC, which provides examples for types of critical customers, and establishing a new definition for ‘critical customers’ in the DSC’s “Definitions” section. The OEB’s has proposed the definition below for a critical customer:

“critical customers” include, at a minimum, emergency services (police fire and ambulance services) stations, hospitals, water and wastewater treatment plants, designated emergency shelters, and municipal and provincial emergency operations centres as well as any other customers that are a priority for communications related to a severe weather event.”

Hydro One believes that the last part of the definition has the potential to result in subjective interpretations. Hence, for clarity, Hydro One recommends the revisions in bold below:

*“critical customers” include, at a minimum, emergency services (police, fire and ambulance services) stations, hospitals, water and wastewater treatment plants, designated emergency shelters, and municipal and provincial emergency operations centres as well as any other **vulnerable** customers ~~that are a priority for who have agreed to receive~~ communications related to a severe weather event.”*

3.0 Minimum Communication Requirements for High-Impact, Low-Frequency (“HILF”) Events

a) Section 4.9.6

The OEB’s proposed section 4.9.6 states:

“4.9.6 In the case of a high-impact low-frequency event, a distributor shall in addition to the requirements set out in sections 4.9.1 to 4.9.5:

(a) make updates to the estimated time of restoration available to affected customers at intervals not exceeding six hours, starting from 48 hours after the event's onset and continuing until service is restored to all customers; and

(b) conduct a customer survey to evaluate the effectiveness of the distributor's communications during the high-impact low-frequency event and revise its communications approach as warranted based on the results of the survey. The survey shall:

- be completed within 60 days after service has been restored to all customers; and*
- include questions to assess customer satisfaction with the nature and timing of the information provided during the high-impact low-frequency event and to gather feedback on areas for improvement.*

The OEB defines a HILF event as a severe weather event that meets the following criteria:

- i) the daily System Average Interruption Duration Index ("SAIDI") exceeds the distributor's Major Event Day threshold as calculated in accordance with IEEE Standard 1366; and
- ii) more than 48 hours is required for the distributor to restore service to at least 90% of affected customers."

Hydro One agrees with the OEB's use of the IEEE Standard 1366 threshold and 48-hour restoration time for defining a HILF event. This approach aligns with the Board's preference for distributors to use the approach in IEEE Standard 1366 for determining a Major Event, as currently stated in its Electricity Reporting and Record-keeping Requirements ("RRR").¹ However, Hydro One also understands that an event cannot be determined to have met the IEEE 1366 Major Event criteria until all relevant data for the event have been gathered and assessed. The current RRR requirements acknowledge this and provide distributors with up to 60 days following a Major/HILF Event² to file a report making this determination and identifying their actions in response to the event.

Therefore, Hydro One questions the OEB's proposal to obligate distributors to comply with additional communication requirements specific to a HILF event after 48 hours when it is not possible to determine whether an event classifies as a HILF until weeks later after all information has been gathered and assessed. According to the OEB's own definition, the passage of 48 hours alone is not sufficient to determine a HILF event. Considering the above, Hydro One recommends the following revision to 4.9.6 denoted in bold:

"4.9.6 After the determination of ~~In the case of~~ a high-impact low-frequency event, a distributor shall in addition to the requirements set out in sections 4.9.1 to 4.9.5;

(a) make updates to the estimated time of restoration available to affected customers at intervals not exceeding six hours, starting from 48 hours after the event's onset and continuing until service is restored to all customers;

¹ "Electricity Reporting & Record Keeping Requirements" ("RRR"), Section 2.4.1.2 item 4) Major Events, Ontario Energy Board.

² Unless there are exceptional circumstances, in which case the report may be filed within 90 days after the end of the Major Event. RRR, Section 2.1.4.2.10 Major Event Reporting.

Although Hydro One cannot recommend specific changes for section 4.9.6 (b) at this time, we strongly recommend that the proposed requirements for conducting HILF-related customer surveys and reporting be logically sequenced in acknowledgement of the time required to make the HILF determination. They also must be reviewed against the current RRR requirements (including timelines) for Major Event determination and reporting. Clearly the requirements between the proposed DSC amendments and those in the RRR must be aligned to avoid inconsistencies and confusion.

Hydro One appreciates the opportunity to comment on these proposed amendments and trusts that they will be helpful to the Board. Please do not hesitate to contact myself or Carolyn Russell (carolyn.russell@HydroOne.com) if you have further questions. An electronic copy of this response has been submitted using the Board's Regulatory Electronic Submission System.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Savulak", written in a cursive style.

Jason Savulak