



By RESS

January 17, 2025

Ms. Nancy Marconi
Registrar
Ontario Energy Board
PO Box 2319
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4

Dear Ms. Marconi:

Subject: EB-2021-0307, Proposed Amendments to the Distribution System Code to Set Minimum Requirements for Customer Communication Regarding Interruptions and Restoration of Service Following Severe Weather Events

Hydro Ottawa Limited (Hydro Ottawa) appreciates the invitation to comment on the Ontario Energy Board's (OEB) proposed amendments to the Distribution System Code.

Please see Appendix A attached, which provides Hydro Ottawa's comments on the Notice of Proposal to Amend Code, sent by OEB staff on December 16, 2024.

Hydro Ottawa appreciates this opportunity to provide comments and looks forward to continued dialogue with the OEB on this important initiative.

Sincerely,

Signed by:

April Barrie

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April Barrie

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Appendix A

OEB Proposed Amendments to Customer Communications

On December 16, 2024, the Ontario Energy Board (OEB) posted a notice of proposal to amend the Distribution System Code (DSC). The amendments set minimum communication requirements for distributors related to the interruption and restoration of electricity services.

Hydro Ottawa requests clarification from the OEB on two of the proposed amendments: (1) the proposed definition of “critical customers” in Section 1.2 of the DSC; and, (2) Section 4.9.6.

1. Critical Customers Definition

The OEB has proposed that section 1.2 of the Distribution System Code be amended by adding the following definition:

“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 Ottawa requests that the OEB clarify what the following portion of the definition entails: “as well as any other customers that are a priority for communications related to a severe weather event.” Based on the rationale the OEB provided of not expanding the customer group to other types of customers, Hydro Ottawa understands that the OEB is proposing to consider certain community support agencies and organizations as part of this definition, and does not believe this definition intended to include individual customers, for example as referenced in DSC s. 4.2.3 (a). However, if that is the case, Hydro Ottawa requests that the OEB clarify this in its proposed definition of “critical customers”.

As customers and other stakeholders may not read the proposed definition, once implemented, within the context of the December 16, 2024 amendment letter, the definition could be interpreted by customers to include a wider group than the OEB has intended.

As such, Hydro Ottawa proposes the phrase should be clarified to ensure customer understanding and better consistency in implementation.

2. Section 4.9.6 (a)

Section 4.9.6 (a) of the OEB proposed amendments reads as follows:

“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.”

Hydro Ottawa seeks clarification as to whether the 48-hour timeline constitutes a deadline for distributors to issue ETRs to all affected customers, even when a damage assessment has not been completed.

During the Ottawa Derecho storm in 2022 over 180,000 Hydro Ottawa customers representing nearly 50% of its customers were experiencing outages. Completing damage assessments and providing accurate ETRs within 48 hours was not feasible. It is Hydro Ottawa's understanding that the OEB's intent in these proposed amendments is to communicate regularly with customers during major weather events. Hydro Ottawa therefore seeks clarification as to whether “updates to the estimated time of restoration” in s. 4.9.6 requires that distributors communicate to customers an ETR, even in instances where a damage assessment has not been completed.