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January 23, 2025

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON, M4P 1E4

Dear Ms. Marconi,

**RE: EB-2024-0199 Vulnerability Assessment and System Hardening Project
Feedback Comments of Energy Probe**

In its letter of December 17, 2024, the OEB invited interested stakeholders to provide written feedback on the draft VA Report and VA Toolkit by January 23, 2025. The following are the feedback comments of the Energy Probe Research Foundation (Energy Probe).

General Comments

Energy Probe believes that the Vulnerability Assessment and System Hardening (VASH) Project is unnecessary and may result in excessive spending by distributors leading to large rate increases.

Comments on Specific Sections of the Draft VA Report

2.2. Jurisdictional Scan (pages 4-6 of the Draft Report)

The OEB conducted a review of leading jurisdictions in North America requiring electricity distribution utilities to complete vulnerability assessments and incorporate system hardening measures into their rate cases.

The report then discusses four US states: California, Florida, Texas and New York.

Energy Probe Comments

It is not clear why OEB believes that California, Florida, Texas, and New York are leading jurisdictions that Ontario should emulate. Two of those jurisdictions, California and New York, have some of the highest electricity distribution rates in the US. The other two are in the region that is prone to hurricanes, which Ontario is not.

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The following table is on page 16 of the Draft Report.

Table 2 Example Climate Perils and Illustrative Metrics

Peril	Metric
Extreme Heat	Daily Max Temperature
	Daily Average Temperature
	Heating Degree Days
	Days above 30°C
Extreme Cold	Daily Min Temperature
	Cooling Degree Days
	Days below 0°C
Wind Damage	Wind Speed- 10-min sustained max
	Wind Speed- 3-second gusts
Flooding	Flood Depth
	Flood Duration
	Flood Velocity
Wildfire	Fire Weather Index
	Fire Occurrence Probability Index
Precipitation	Daily Maximum
	Annual Average
	Maximum 3 day

Energy Probe Comments

Listed under *Extreme Heat* are *Heating Degree Days* which makes no sense. *Heating Degree Days* is a measure of the days when space heating is required because of cold outside temperatures. Also under *Extreme Heat* are days above 30C, which are common in Southern Ontario every summer. There is nothing extreme about 30C temperatures in summer. Listed under *Extreme Cold* are *Cooling Degree Days* which are not a measure of cold but a measure of the number of days when air conditioning would be required. *Cooling Degree Days* should be listed under *Extreme Heat* and *Heating Degree Days* should be listed under *Extreme Cold*. Also listed under *Extreme Cold* are Days below 0C which are common throughout Ontario in winter. There is nothing extreme about days below 0C temperatures in winter. Energy Probe suggests that the sections in the table listed as *Extreme Heat* and *Extreme Cold* be replaced with *Heat* and *Cold*.

The Draft Report and the Toolkit use the term *Climate Peril*. It is not clear what is a *Climate Peril* and how is it different from a normal weather event. The report implies that temperatures below 0C and above 30C are a new peril when in fact they are common every year and have

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been since temperatures were first recorded in Ontario. Similarly, wind gusts, which are a common and regular occurrence in Ontario are listed as a *Climate Peril* when in fact they are normal weather events. Energy Probe suggests that the term *Climate Peril* be replaced with *Severe Weather Event*.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe)
Zubin Panchal (OEB Staff)