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BY EMAIL AND WEB POSTING

March 14, 2025

To: All Licensed Electricity Distributors  
All Licensed Electricity Transmitters  
All Licensed Electricity Unit Sub-Meter Providers  
All Licensed Electricity Generators  
All Licensed Electricity Storage Providers  
All Licensed Electricity Retailers  
All Licensed Natural Gas Marketers  
All Licensed Natural Gas Distributors  
All Other Interested Parties

Re: **2025 Annual Reporting and Record-keeping Requirements (RRR) and Updates to RRR Documentation and Processes – Electricity Licensees and Natural Gas Marketers**

The Ontario Energy Board (OEB) is pleased to provide an overview of the changes to the Reporting and Record-keeping Requirements (RRR) and RRR documentation and processes for certain electricity licensees and for licensed natural gas marketers.

To align with government expectations, the OEB continues its efforts to review and improve the RRR process. The objective to right-size the requirements, enhance the filing system and improve overall efficiency was a key driver for the changes described in this letter. In addition to refining specific requirements, the OEB has leveraged its internal RRR Stewardship Program to identify improvements that reduce the time and effort required for RRR data filing. The OEB hosted an [RRR Stakeholder Meeting](#) on January 20<sup>th</sup>, 2025 to engage stakeholders and provide updates on recent and upcoming changes to the RRR. Feedback received will play a crucial role in shaping planned enhancements for the next fiscal year.

For the April 2025 filing, where entities will report for the 2024 calendar year, several changes described below are being made to streamline the RRR, enhance the RRR Filing Portal and account for new reporting requirements. To ensure RRR requirements and guidance are up to date, the OEB has today issued updated versions of the following:

- [Electricity Reporting and Record-keeping Requirements \(Electricity RRR\)](#),
- [RRR Filing Guide for Electricity Distributors](#) and
- [Natural Gas Reporting and Record Keeping Requirements: Gas Marketer Licence Requirements \(Natural Gas Marketer RRR\)](#).

The changes to the Electricity RRR and the Natural Gas Marketer RRR relative to the versions issued on March 27, 2024 are shown in Appendix A and B, respectively.

For applicable filers, the updated RRR forms are now available in the [RRR Filing Portal](#) and the deadline to submit is **April 30, 2025**.

### **Reduced Frequency of Reporting for Retailers and Marketers**

Electricity retailers and natural gas marketers have historically reported their RRR data on a quarterly basis. The OEB has decided to transition electricity retailers and natural gas marketers to annual filings that will be due at the end of April each year, aligning with the annual filing timeline applicable to other regulated entities. This change in filing frequency affects section 4.1 of the Electricity RRR and section 2.1 of the Natural Gas Marketer RRR. Entities will be required to submit their annual reports broken down by calendar quarter.

- The requirement for quarterly filings remains in effect for calendar 2024, with the final quarterly filing having been due February 28, 2025. The next filing will be due April 30, 2026, covering calendar 2025.

### **Changes to Reporting Requirements for Electricity Distributors and Unit Sub-meter Providers**

The following describes changes to the Electricity RRR applicable to filings due on and after April 30, 2025.

#### **Electricity RRR 2.1.4.2.5 – Interruption Sub-cause Codes Reliability Reporting**

As previously announced as part of the OEB's reliability and power quality review initiative, reliability reporting by interruption sub-cause code is required starting April 2025 (covering the 2024 calendar year). Changes to this section were previously incorporated into the Electricity RRR on March 27, 2024.

#### **Electricity RRR Section 2.1.4.1 - Reporting on Service Quality Requirements for Consolidating Electricity Distributors**

The July 2024 [\*Handbook to Electricity Distributor and Transmitter Consolidations: Rate-making Considerations and Filing Requirements for Consolidation Applications\*](#) includes post-consolidation reporting requirements for electricity distributors. Distributors that have completed a consolidation transaction must report on service quality requirements on a consolidated basis for the first full fiscal year.

#### Electricity RRR section 2.1.4.2.11 - Post-Consolidation Reliability Reporting

The OEB is adding a new section 2.1.4.2.11 to the Electricity RRR that is applicable to electricity distributors who have completed a consolidation and are within an approved deferred rebasing period.

#### Electricity RRR section 2.1.4.2.12 – Voluntary Feeder-level Reliability Reporting

In a [letter](#) dated January 30, 2024, the OEB indicated that it was instituting feeder-level reliability reporting on a voluntary basis and provided details regarding the information to be reported. This voluntary approach will allow the OEB to assess the results of the reporting and make any necessary adjustments before considering mandating the reporting of feeder-level reliability data for all distributors.

Although still voluntary, the OEB has included a reference to this reporting in the Electricity RRR to serve as a reminder and to facilitate reporting. Distributors that have feeder level information available are encouraged to start reporting the requested feeder-level reliability information in April 2025 for the 2024 calendar year.

#### Electricity RRR 2.1.5.8 – Additional Reporting for Activity and Program-based Benchmarking

This section has been revised to include reporting on additional data to support two recommendations set out in the OEB's June 28, 2024 [\*Report-Back-to-Minister-on-System-Expansion-for-Housing-Developments-20241021.pdf\*](#). Most of the updates to this section call for voluntary reporting, but the expectation is that this reporting will become mandatory for the **2025** year (i.e., for filings due on and after April 30, **2026**).

The updates to this section are:

- a) Reporting of the number of poles, tower and fixtures by type of asset in addition to all three in the aggregate

- b) Reporting meters installed and meters warehoused in addition to an aggregate number of meters
- c) Reporting typical residential connection and disconnection costs
- d) Reporting on quantity of OM&A costs for meters
- e) Reporting on OM&A costs for lines

#### Electricity RRR 2.1.5.3 - Supply and Delivery Information

Revisions have been made to paragraph (d) of this section to improve filing accuracy.

#### Electricity RRR 8.1 – Reporting by Unit Sub-meter Providers

Section 8.1 has been reorganized for greater clarity by limiting the scope of section 8.1.1 to information related to the OESP and LEAP and moving the two elements regarding general customer information to a new section 8.1.2.

#### **Enhancements to the Portal for April 2025 Filing by Electricity Distributors**

##### Electricity RRR 2.1.19 – Biennial Survey Results

The filing portal has been updated such that the “Public Awareness of Electrical Safety” and “customer satisfaction” survey results only need to be submitted if the most recent survey was conducted during the calendar year that is being reported.

##### Error Proofing and Auto-populating Data on Input

Upgrades to the filing portal were also made in relation to the information required by sections 2.1.5, 2.1.14 and 2.1.7 of the Electricity RRR to improve error notifications when data issues are detected and to auto-populate cells where applicable to reduce the need for redundant data input. This includes notifying users of potential data errors upon exit of fields and improvement of error messaging for better clarity.

By ensuring accurate data before submission, these enhancements aim to reduce reporting input errors by distributors and streamline the data validation process for OEB staff.

#### **Information and Filing Clarification**

##### Electricity RRR 2.1.19 – Standardized Distribution System Plan Implementation Progress

For purposes of reporting on distribution system plan implementation progress under section 2.1.19 of the Electricity RRR, it is recommended that the information for “Asset Management (e.g. Distribution System Plan Implementation Progress)” on the filing portal be entered as a percentage, defined as the amount spent relative to the amount planned on a year-over-year basis.

### **Potential RRR Changes for the April 2026 Filing and Beyond for Electricity Distributors**

As various initiatives are advanced, the OEB aims to provide sufficient notice of potential future RRR changes. To further support the OEB’s work on enhancing activity and program-based benchmarking, the OEB is considering amendments to section 2.1.5.8 of the Electricity RRR to require the reporting of additional information in 2026. This may include (among others) data on the total number and cost of installation of:

- Pad-mounted transformers
- Pole-mounted transformers
- Below grade distribution voltage cable
- Overhead primary and secondary installation costs

The OEB intends to consult on these changes in 2025.

Any questions relating to this letter should be directed to [performance\\_reporting@oeb.ca](mailto:performance_reporting@oeb.ca).

Yours truly,

Kevin Mancherjee  
Director, Operations Decision Support

**APPENDIX A**

**Amendments to the Electricity Reporting and Record-keeping Requirements**  
**Comparison of Relevant Sections Against the March 27, 2024 Version March 14,**  
**2025**

*Note: Underlined text indicates additions to the RRR and strikethrough text indicates deletions from the RRR.*

1. The following sections are added to Section 2.1.4.2:

**2.1.4.2.11 Post Consolidation Reliability Reporting**

Distributors that have completed a consolidation transaction after January 1, 2025 are to provide either rate zone or feeder-level reliability reporting for each of the pre-consolidation rate zones, during the approved deferred rebasing period.

If rate zone reporting is being submitted, the information required by sections 2.1.4.2.1 to 2.1.4.2.10 shall be provided for each of the pre-consolidation rate zones in addition to reporting on a consolidated basis.

If feeder-level reliability reporting is being submitted, then the rate zone and 'Name of the Feeder' must be uniquely identified together with the data below:

- (a) Name of Rate Zone
- (b) Name of the Station
- (c) Name of the Feeder
- (d) Feeder Average Interruption Frequency Index (FAIFI)
  - i. Total number of customer interruptions occurred on the feeder in the year;
  - ii. Average number of customers served by the feeder in the year<sup>1</sup>; and
  - iii. FAIFI is i./ii.
- (e) Feeder Average Interruption Duration Index (FAIDI)
  - i. Total number of customer-hours of interruptions in the year;
  - ii. Average number of customers served by the feeder in the year; and
  - iii. FAIDI is i./ii.
- (f) Feeder Average Interruption Frequency Index (Loss of Supply Adjusted)  
This index adjusts FAIFI for the effects of interruptions caused by Loss of Supply, and is calculated in the same way as described in (d), except that the

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<sup>1</sup> The "Average number of customers served by the feeder" is calculated by adding the total number of customers served by that feeder on the first day of the year and the total number of customers served by that feeder on the last day of the year and the total number of customers served by that feeder on the last day of the year and dividing by two.

- total number of customer interruptions caused by Loss of Supply events is deducted from the total customer interruptions.
- (g) Feeder Average Interruption Duration Index (Loss of Supply Adjusted)  
This index adjusts FAIDI for the effects of interruptions caused by Loss of Supply, and is calculated in the same way as described in (e), except that the total customer-hours of interruptions caused by Loss of Supply events is deducted from the total customer-hours of interruptions.
- (h) Feeder Average Interruption Frequency Index (Major Event Adjusted)  
This index adjusts FAIFI for the effects of interruptions caused by Major Events, and is calculated in the same way as described in (d), except that the total number of customer interruptions caused by Major Events is deducted from the total customer interruptions.
- (i) Feeder Average Interruption Duration Index (Major Event Adjusted)  
This index adjusts FAIDI for the effects of interruptions caused by Major Events, and is calculated in the same way as described in (e), except that the total customer-hours of interruptions caused by Major Events is deducted from the total customer-hours of interruptions.

#### **2.1.4.2.12 Voluntary Feeder-level Reliability Reporting**

Distributors are encouraged to report the feeder-level reliability information set out in section 2.1.4.2.11 on a voluntary basis for all feeders for which that information is available.

2. Section 2.1.5.3 is amended as follows:

#### **2.1.5.3 Supply and Delivery Information**

For the purposes of this section, all kWhs other than in relation to distribution losses shall be reported based on a reading of the applicable meter, without being grossed up for loss factor.

- a) Supply:
- i. Total kWhs of electricity that has flowed into the distributor's distribution system from the IESO-controlled grid or the distribution system of a host distributor; and
  - ii. Total kWhs of electricity that has flowed into the distributor's distribution system from all embedded generation facilities.
- b) Delivery: Total kWhs of electricity delivered to all customers in the distributor's licensed service area and to embedded distributors.

- c) Distribution losses in kWhs, calculated as the difference between the supply as reported in a(i) and a(ii) above, less delivery as reported in b) above.
- d) Embedded distributors are to report the dollar amount charged to them by any host distributor for transmission and/or low voltage services.

3. Section 2.1.5.8 is amended as follows:

**2.1.5.8** A distributor shall provide, annually by April 30, the following information in relation to Activity and Program-based Benchmarking:

- a) A fixed asset continuity schedule for the preceding calendar year for the corporate entity regulated by the Board;
- b) The quantity of equipment installed for the following asset classes:
  - i. Poles, Towers and Fixtures
  - ii. Distributors are encouraged to report the following additional information on a voluntary basis:
    - a. Number of Poles installed in the preceding calendar year
    - b. Number of Towers installed in the preceding calendar year
    - c. Number of Fixtures installed in the preceding calendar year
  - iii. Line Transformers
  - iv. Meters
  - v. Distributors are encouraged to report the following additional information on a voluntary basis:
- c) Number of meters installed in the preceding calendar year
- d) Number of meters warehoused in the preceding calendar year
- e) General system information
  - i. Number of stations
  - ii. Number of station transformers
  - iii. MVA of station transformers
  - iv. Total number of poles
  - v. Total number of line transformers
- f) Residential customer connection/disconnection cost information
  - i. Typical residential customer connection cost
  - ii. Typical residential customer disconnection cost at meter



- iii. Typical residential customer disconnection cost at pole/transformer
  - g) Distributors are encouraged to report the following additional information on a voluntary basis:
    - i. Meters
      - a. Quantity of meters processed for Measurement Canada in the preceding calendar year
      - b. Quantity of meters repaired in the preceding calendar year;
    - ii. Lines OM&A
      - a. Of the total OM&A reported in 2.1.7 for lines, the percentage attributable to overhead primary line in the preceding calendar year
      - b. Of the total OM&A reported in 2.1.7 for lines, the percentage attributable to buried primary line in the preceding calendar year.

4. Section 4.1 is amended as follows:

**4.1.1** A retailer shall provide, ~~quarterly by the last day of the second month following the period end~~ annually by April 30, a summary of the following market monitoring information for the preceding calendar year broken down by calendar quarter...

**4.1.1a** A retailer shall provide, ~~quarterly by the last day of the second month following the period end~~ annually by April 30, a summary of the following market monitoring information for contracts for which the retailer is a third party generator as defined in Section 2 of Ontario Regulation 389/10 for the preceding calendar year, broken down by calendar quarter...

**4.1.2** A retailer shall provide, ~~quarterly by the last day of the second month following the period end~~ annually by April 30, a summary of the following market monitoring information ~~for the quarter~~ pertaining to customers who are low volume consumers (as defined in the Electricity Retailer Code of Conduct) for the preceding calendar year, broken down by calendar quarter:

- a) Number of salespersons who have successfully enrolled a customer (accepted by a distributor for flow) or successfully renewed a contract;
- b) Number of new enrolments (accepted by a distributor for flow);

- c) Number of contract renewals;
- d) Marketing Approach Percentages based on new enrolments (accepted by a distributor for flow) and renewed contracts ~~during the reported quarter~~, broken down by: direct mail, in person, telesales, internet sales and other;
- e) Number of consumer complaints;
- f) Retail offers accepted by customers that have been successfully enrolled (accepted by a distributor for flow) ~~during the quarter~~. Details include the contract length and all pricing details.

**4.1.2a** A retailer shall provide, ~~quarterly by the last day of the second month following the period end~~ annually by April 30, a summary of the following market monitoring information pertaining to customers who are low volume consumers with contracts referred to in Part B, Section 1.3 of the Electricity Retailer Code of Conduct for the preceding calendar year, broken down by calendar quarter:

- a) Number of salespersons who have successfully enrolled a customer or successfully renewed a contract;
- b) Number of new enrolments;
- c) Number of contract renewals;
- d) Marketing Approach Percentages based on new enrolments and renewed contracts ~~during the reported quarter~~, broken down by: direct mail, telesales, internet sales and other;
- e) Number of consumer complaints;
- f) Retail offers accepted by customers that have been successfully enrolled ~~during the quarter~~. Details include the contract length and all pricing details.

5. Section 8.1 is amended as follows:

**8.1.1** A unit sub-meter provider shall provide, annually by April 30, the following information with respect to the provision of the OESP and LEAP emergency financial assistance in the preceding calendar year:

- a) The number of eligible low-income customer accounts at year end;
- b) The number of customer accounts that received LEAP emergency financial assistance during the year;
- c) The number of OESP recipients at year end;
- d) The number of OESP recipients in the year who were no longer receiving OESP at year end; and

- e) The number of OESP recipients who also received a LEAP emergency financial assistance grant during the year.
- f) ~~The total number of residential customers with accounts (e.g. electricity is billed by unit sub-meter provider)~~
- g) ~~The total number of commercial customers with accounts (e.g. electricity is billed by unit sub-meter provider)~~

**8.1.2** A unit sub-meter provider shall provide, annually by April 30, the following general customer information for the preceding calendar year:

- a) The number of residential customers with accounts at year end (e.g. electricity is billed by the unit sub-meter provider;
- b) The number of non-residential customers with accounts at year end (e.g. electricity is billed by the unit sub-meter provider).

**APPENDIX B****Amendments to the Natural Gas Marketer RRR****Comparison of Relevant Sections Against the March 27, 2024 Version****March 14, 2025**

*Note: Underlined text indicates additions to the RRR and strikethrough text indicates deletions from the RRR.*

**2.1.1** A gas marketer shall provide in the form and manner required by the Board, ~~quarterly, on the last day of the second month following the quarter end~~ annually by April 30, information on the total number of customers ~~at the end of the reporting quarter~~ who are low volume consumers as defined in the Act in the preceding calendar year, broken down by calendar quarter and by type of contract as follows...

**2.1.2** A gas marketer shall provide in the form and manner required by the Board, ~~quarterly, on the last day of the second month following the quarter end~~ annually by April 30, a summary of the following market monitoring information ~~for the quarter~~ pertaining to low volume consumers for the preceding calendar year, broken down by calendar quarter:

- a) Number of salespersons who have successfully enrolled a consumer (accepted by a gas distributor for flow) or successfully renewed a contract;
- b) Number of new enrolments (accepted by a gas distributor for flow);
- c) Number of contract renewals;
- d) Marketing approach percentages based on new enrolments (accepted by a gas distributor for flow) and renewed contracts ~~during the reported quarter~~, broken down by: direct mail, in-person, telesales, internet sales, automatic renewals and other;
- e) Number of consumer complaints; and
- f) Retail offers accepted by customers that have been successfully enrolled (accepted by a gas distributor for flow) during the quarter. Detailed include the contract length, and pricing details.

Marketers licensed to act as an agent only, are exempt from this requirement.