

79 Wellington St. W., 30th Floor Box 270, TD South Tower Toronto, Ontario M5K 1N2 Canada P. 416.865.0040 | F. 416.865.7380 www.torys.com

Jonathan Myers jmyers@torys.com P. 416.865.7532

April 24, 2025

RESS, EMAIL & COURIER

Ontario Energy Board P.O. Box 2319 27th Floor, 2300 Yonge Street Toronto, ON M4P 1E4

Attention: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: Wataynikaneyap Power LP – 2024 Performance Report (EB-2023-0168)

In the Ontario Energy Board's Decision and Order in the above-referenced proceeding, dated November 30, 2023, it approved a Settlement Proposal under which Wataynikaneyap Power LP (WPLP) agreed to report on certain interim performance metrics for portions of its transmission system that have gone into service while construction continues on the remainder of its system. This was consistent with the manner in which WPLP reported, on May 12, 2023, regarding performance of 2022 in-service assets pursuant to the approved Settlement Proposal in EB-2021-0134. Therefore, on April 23, 2024, WPLP filed its *2023 Performance Report* in response to the commitment in EB-2023-0168. As construction continued during 2024, WPLP is pleased to provide its *2024 Performance Report* for the Wataynikaneyap Transmission Project. Please note that a copy has been filed on RESS.

Yours truly

Jonathan Myers

Enclosure

cc: Ms. Margaret Kenequanash, WPLP Mr. Duane Fecteau, WPLP Mr. Charles Keizer, Torys LLP

EB-2023-0168 Wataynikaneyap Power LP 2024 Performance Report April 24, 2025 Page 1 of 7

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998,* C.S.O. 1998, c.15 (Sched. B);

AND IN THE MATTER OF an Application by Wataynikaneyap Power GP Inc. on behalf of Wataynikaneyap Power LP ("WPLP"), for an Order or Orders made pursuant to section 78 of the Act, approving or fixing just and reasonable rates for the transmission of electricity.

WATAYNIKANEYAP POWER LP

2024 Performance Report

April 24, 2025



1. Introduction

On August 13, 2020, the OEB issued a Decision and Order approving WPLP's request for temporary exemptions from many of the OEB's Electricity Reporting and Record Keeping Requirements (RRR), on the basis that such requirements were either not applicable, or would provide limited value to the OEB, for the period during which WPLP's transmission system is under construction.¹ The OEB subsequently extended WPLP's temporary RRR exemptions by one-year, such that the majority of WPLP's RRR reporting will commence in 2026, for the 2025 reporting period.²

In WPLP's inaugural rate application (EB-2021-0134), parties to the OEB-approved Settlement Proposal³ agreed that WPLP would report on several interim performance metrics, as follows:

"in respect of the Line to Pickle Lake and the portions of the Remote Connection Lines that will be placed into service in 2022, WPLP will monitor performance on the basis of the following reliability metrics without establishing performance targets and report to the OEB on such performance, based on data as at Year End 2022, to be provided in approximately April 2023 consistent with the timing of (but not pursuant to) the OEB's RRR reporting requirements:

- Total Recordable Injuries Frequency Rate ("TRIFR") # of recordable injuries per 200,000 hours worked, using Canadian Electricity Association definition of "recordable injuries";
- Recordable Injuries (# of recordable injuries per year, using Canadian Electricity Association definition of "recordable injuries");
- Violations of NERC FAC-003-4 Vegetation Compliance Standard (in respect of the Line to Pickle Lake portion of the transmission system only);
- OM&A cost per kilometre of line and OM&A cost per station;
- Average system availability;
- Transmission System Average Interruption Duration Index (T-SAIDI); and
- Transmission System Average Interruption Frequency Index (T-SAIFI).

In its 2024 rate application (EB-2023-0168), the OEB accepted WPLP's proposal to continue to monitor performance on the basis of the above reliability metrics without establishing performance targets and to report to the OEB on such performance, based on data as at Year End 2023, which was filed on April 23, 2024, and based on data as at Year End 2024 in approximately April 2025, consistent with the timing of (but not pursuant to) the OEB's RRR reporting requirements.⁴

Accordingly, this 2024 Performance Report addresses the metrics listed above, based on data as at Year End 2024, organized by category:

Section 2 - Safety Performance

¹ EB-2020-0142 & EB-2020-0143, Decision and Order.

² EB-2022-0330, Decision and Order dated April 6, 2023.

³ EB-2021-0134, Decision and Order dated September 30, 2021, Schedule A, p. 13 of 59.

⁴ EB-2023-0168, Exhibit D-1-1, p.2 of 6.

EB-2023-0168 Wataynikaneyap Power LP 2024 Performance Report April 24, 2025 Page 3 of 7

- Section 3 NERC FAC-003-4 Compliance
- Section 4 OM&A Unit Cost Summary
- Section 5 Transmission System Reliability

2. Safety Performance

The Settlement Agreement from EB-2021-0134 includes the following safety-related performance metrics:

- Recordable Injuries, calculated as the number of recordable injuries per year, using the Canadian Electricity Association definition of "recordable injuries"
- Total Recordable Injuries Frequency Rate (TRIFR), calculated as the number of recordable injuries per 200,000 hours worked using the Canadian Electricity Association definition of "recordable injuries"

The Canadian Electricity Association definition of "recordable injuries" is any occupational injury/illness that results in an employee experiencing:

- a) Fatality;
- b) Lost-time injury;
- c) Medical treatment injury;
- d) Restricted work;
- e) Other injury/illness (not captured above), which has:
 - (i) Significant occupational injury/illness; or
 - (ii) Loss of consciousness

The table below provides these metrics in relation to WPLP's operation of the Line to Pickle Lake and Remote Connection Lines.

Metric	2024 Result
Recordable Injuries	0
TRIFR	0

3. NERC FAC-003-4 Compliance

The Settlement Agreement from EB-2021-0134 requires WPLP to report on:

• Violations of NERC FAC-003-4 Vegetation Compliance Standard (in respect of the Line to Pickle Lake portion of the transmission system only)

The NERC FAC-003-4 Vegetation Compliance Standard applies to vegetation management on certain categories of transmission line rights of way to minimize encroachment from vegetation and prevent vegetation-related outages that could lead to cascading failure.

On November 7, 2024, an off-ROW tree fell into WPLP's W54W 230 kV circuit, which runs from Wataynikaneyap SS to Wataynikaneyap TS, resulting in an outage of approximately 13.5 hours.

The specific requirements in the NERC FAC-003-4 standard focus on preventing encroachments into the Minimum Vegetation Clearance Distance (MVCD) on applicable transmission lines due to vegetation growth and/or trees falling into transmission lines from <u>within the ROW</u>. Accordingly, WPLP does not consider the November 7, 2024 outage, which was caused by a tree fall-in from <u>beyond the ROW</u>, to be a violation of the requirements of the NERC FAC-003-4 standard.

The NERC FAC-003-4 standard includes a reporting framework whereby Transmitters and Generators submit quarterly reports to Regional Entities (IESO in Ontario) identifying all sustained outages of applicable lines caused by vegetation. This reporting framework includes a category for sustained outages caused by vegetation falling into applicable lines from outside the ROW (Category 3). WPLP therefore reported the November 7, 2024 outage to IESO pursuant to this reporting framework.

Mitigation actions undertaken by WPLP include accelerating the assessment and removal of high-risk off-ROW trees as a stand-alone work program. As of March 31, 2025, approximately 200 off-ROW trees have been removed over approximately two-thirds of the W54W circuit, with plans to complete assessment and removals on the remainder of the circuit before the end of 2025.

EB-2023-0168 Wataynikaneyap Power LP 2024 Performance Report April 24, 2025 Page 6 of 7

4. OM&A Unit Cost Summary

The Settlement Agreement from EB-2021-0134 requires WPLP to report on:

• OM&A cost per kilometer of line and OM&A cost per station.

The calculation of these cost metrics is provided in the table below, based on assets in-service at year-end 2024. WPLP notes that it's OM&A costs for 2024 reflect a combination of direct O&M costs, plus a portion of overhead costs that are allocated between capital and OM&A costs.⁵ Due to the timing and frequency of significant additions to in-service assets during the construction period, the cost allocation method applied during the construction period, and the lag between assets being placed in service and ramping up various O&M programs related to those assets, the OM&A unit costs listed below should not be considered indicative of WPLP's expected long-term cost performance.

	2024
Total OM&A (Audited)	\$25,084,141
Km of Transmission Line	1741.5
# of Substations	22
OM&A Cost per kilometre of line	\$14,404
OM&A Cost per station	\$1,140,188

⁵ Please refer to Exhibit F of WPLP's various transmission rate applications for additional discussion of WPLP's OM&A costs.

5. Transmission System Reliability

The Settlement Agreement from EB-2021-0134 includes the following transmission system reliability metrics:

- Transmission System Average Interruption Duration Index (T-SAIDI), calculated as the average duration of sustained interruptions per transmission delivery point.
- Transmission System Average Interruption Frequency Index (T-SAIFI), calculated as the average number of sustained interruptions per transmission delivery point.
- Average System Availability, calculated as the percentage of time that supply is available to the average transmission delivery point.

WPLP's 2024 performance for these three reliability metrics is summarized in the table below.

The largest drivers of outage duration in 2024 were tree contact (36% of SAIDI attributable to a single tree contact outage) and Hydro One loss of supply (35% of SAIDI, primarily from planned outages). While the results below are presented from the perspective of WPLP delivery point availability, WPLP was able to work with HORCI to maximize the use of community-wide backup generation in many First Nations to significantly reduce outage impacts to end-use customers during prolonged outages, both planned and unplanned.

The largest driver of outage frequency in 2024 was lightning, where 20 outages contributed to 40% of WPLP's total SAIFI result for 2024. These lightning-caused outages were restored relatively quickly from the control room, minimizing SAIDI impacts.

All Causes:		
T-SAIFI	9.44	
T-SAIDI (minutes)	1,786.3	
Average System Availability	99.661%	
Excluding Loss-of-Supply:		
T-SAIFI	7.42	
T-SAIDI (minutes)	1167.5	
Average System Availability	99.779%	
Excluding Loss-of-Supply and Planned Outages:		
T-SAIFI	6.58	
T-SAIDI (minutes)	964.8	
Average System Availability	99.817%	