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Our Matter Number: 1152812

Registrar  
Ontario Energy Board  
PO Box 2319  
27th Floor, 2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Sirs/Mesdames:

**RE: EB-2024-0302 - Kashechewan Power Corp. Electricity Distributor Licence  
Amendment - KPC Responses to Clarifying Questions**

Please find enclosed herein Kashechewan Power Corporation's ("KPC") responses to the Ontario Energy Board's ("Board") clarifying questions of May 2, 2025 regarding KPC's application requesting exemptions from certain of the Board's rules, codes and requirement.

Yours truly,



Richard King  
RK/AF/nd  
Enclosure

c: Kayla Wesley, *Kashechewan Power Corporation*, General Manager  
Rod Reimer, *Kashechewan Power Corporation*, Consultant

## 1. Performance Indicator Reporting

### A. System Reliability and Service Quality Requirements

Section 2.1.4.2 of the OEB's *Reporting and Record-Keeping Requirements (RRR)* sets out the distributor's obligations to monitor and report on system reliability indicators.

Q1: With respect to section 2.1.4.2:

- I. Does KPC track its SAIDI and SAIFI results in the manner contemplated by sections 2.1.4.2.1 through 2.1.4.2.4?
- II. Given the importance of reliability of service are there any specific concerns or challenges if KPC were required to report its overall SAIDI and SAIFI results each year? Are there any specific items or details that KPC is unable to report?
- III. If yes, please explain why KPC cannot report on those items.

#### **KPC Response:**

*KPC tracks its SAIFI and SAIDI results at the individual customer level and at the community level. Community level outages are also tracked by Five Nations Energy Inc. ("FNEI") which operates the transmission system that connects Kashechewan to the IESO-controlled grid via a single connection point. The length, location, and source of interruptions are tracked and monitored manually by KPC staff, and records of those interruptions are recorded and provided to KPC's Board of Directors.*

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Section 2.1.19 provides for the filing of information related to first contact resolution; billing accuracy; customer satisfaction survey results; public safety (subject to the definitions and targets set out in that section) and distribution system plan implementation progress.

Q2: With respect to section 2.1.19, please confirm whether KPC undertakes Electrical Safety Authority (ESA) authorized system safety audits.

- I. Please confirm KPC's compliance under section 2.1.19 (d) with Ontario Regulation 22/04 and any public safety awareness campaigns KPC undertakes for the protection of its customers and the public.

#### **KPC Response:**

*KPC conducts internal inspections of approximately one-third of its distribution facilities each year, and these inspections are expected to comply with the ESA's standards that would be applied if the inspection results were audited. In addition, KPC undertakes targeted initiatives to increase public safety awareness for the protection of its customers and the public, with an emphasis on youth educational programs. KPC has previously held electrical safety awareness and educational sessions at the school in Kashechewan, distributed pamphlets, and posted educational materials on community bulletin boards. Such programs are expected to have a high level of visibility, given the limited number of community members.*

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## B. Records of Consumer Complaints

Section 2.3.1 of the RRR sets out the obligations for a distributor to maintain records of all complaints by consumers and market participants regarding services provided under the terms of the distributor's licence and responses for a period of two years. As a means of understanding how KPC is addressing any customer concerns, the OEB is interested in understanding KPC's approach to managing customer complaints and its tracking of this information.

Q1: With respect to section 2.3.1:

- I. Please describe KPC's process for tracking customer complaints. Does KPC maintain a record of complaints and would it be available to share if OEB requested information?
- II. Does KPC use a target response timeline or metric to respond to customer complaints? If yes, please describe KPC's practices in this regard.

### **KPC Response:**

*KPC does not currently maintain records of all customer complaints in the manner contemplated by section 2.3.1 or a target response time for addressing any such complaints. Given KPC's limited service area and very small customer base, as well as the fact that Kashechewan is a closely-knit community, any complaints are addressed promptly on a personal basis, and with sufficient accountability to customers and Chief and Council. For example, community members wishing to raise issues with KPC typically phone KPC staff or attend at KPC's office. KPC also confirms customer complaints are infrequent.*

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## **2. Retail Settlement Code**

The *Retail Settlement Code* (RSC) establishes the minimum obligations for electricity distributors to ensure accurate financial settlements, including a distributor's obligations as a market participant in the IESO-administered market. The Kashechewan distribution system is connected to the IESO controlled grid and KPC is subject to the requirements of a market participant. The RSC sets out the mechanics for KPC to settle wholesale (IESO) charges with its customers.

Q1: Please explain the pricing mechanism that KPC uses to process its financial settlement with the IESO.

Q2: Please confirm whether KPC relies on the rules in the RSC for settlement purposes. If it does not, please explain how KPC deviates from the RSC rules in settling with the IESO.

### **KPC Response:**

*FNEI has entered into a Meter Service Provider Agreement ("MSPA") and Wholesale Settlements Services Agreement ("WSSA") with a third-party metering service provider, Meter Services Peterborough ("MSP").*

*Pursuant to the terms of the MSPA, MSP ensures that the bulk electricity meters at the FNEI substation in Kashechewan measures all the electricity that enters KPC's service area, and ensures that all meters within KPC's service area are operating correctly.*

*Pursuant to the WSSA, Meter Services Peterborough provides wholesale and retail settlement services to KPC. The WSSA establishes procedures for meter data collection and information sharing between KPC and MSP to enable MSP to accurately perform its wholesale and retail settlement functions under the WSSA. With respect to the pricing mechanism contemplated by the WSSA, it is an express requirement of the WSSA that, in providing wholesale and retail settlement services to KPC, MSP ensures compliance with the IESO Market Rules, OEB Codes, and government legislation, as they may be amended from time to time, so far as they are applicable to the settlement services provided under the WSSA. The WSSA further requires that MSP observe applicable performance standards, including Chapter 5 – Settlements Manual (including Validating, Estimating, and Editing Standards), Chapter 9 – Settlements & Billing (including the applicable Appendices), and the process standards and timelines as set forth in the RSC.*

*Given that KPC's customers are all eligible for Regulated Price Plan ("RPP") pricing, and that there are no customers requiring more 50kW in a single billing period, the role of the MSP, in practice, is generally to verify that the invoices prepared by the IESO accurately reflects the actual energy withdrawn from the wholesale market.*

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### **3. Standard Supply Service Code**

Among other things, the OEB's *Standard Supply Service Code* (SSSC) establishes the manner in which a distributor must provide standard supply service to meet its obligation to sell electricity under section 29 of the *Electricity Act*, 1998 or to give effect to rates determined by the Board under section 79.16 of the *Ontario Energy Board Act*, 1998. The SSSC provides for four regimes applicable to the commodity price for electricity provided as standard supply service. They include tiered pricing for regulated price plan (RPP) consumers with conventional meters who have elected RPP pricing. While KPC customers do not have smart meters, KPC is nevertheless required to offer RPP pricing related to RPP eligible customers.

Q1: Please confirm that KPC offers RPP tiered pricing in accordance with the SSSC to its residential and non-residential RPP eligible customers and spot market pricing for any non-RPP eligible non-residential customers.

#### **KPC Response:**

*KPC confirms that it utilizes RPP tiered pricing in accordance with the SSSC for all its residential and non-residential customers. KPC does not offer spot market pricing because KPC does not have commercial or industrial customers with individual capacity exceeding 50kW. Accordingly, all KPC customers are eligible for the RPP. Further, KPC does not offer spot market pricing because existing residential and non-residential customers would not benefit from spot market pricing.*

#### 4. Cyber Security

All distributors have a responsibility to protect their customers' information and take steps to maintain the security of their systems. The OEB wants to be assured that appropriate protection of customer information and systems is in place for the reliable and secure operations of each distributor. Section 6.8.1.1 of the DSC sets out the obligation for a distributor to report to the OEB on the status of its cyber security readiness in relation to the Ontario Cyber Security Framework.

Q1: Has KPC ever had its cyber security readiness assessed by an independent third-party? If yes, please describe the assessment and provide a copy of any assessment.

**KPC Response:**

*KPC has not had its cyber security readiness assessed by an independent third-party.*

Q2: What does KPC plan to do in the next five years to meet the cyber security requirements of the DSC?

**KPC Response:**

*KPC will continue to implement policies and procedures to enhance its cyber security commensurate with that of a small utility utilizing standalone computer systems.*

Q3: Please describe how KPC ensures that the confidentiality of its customer information is maintained.

**KPC Response:**

*Customer information is currently maintained on a single computer accessible only with a secured password known by certain KPC staff and external consultants.*