

Stakeholder	Summary of Comments - Reporting Requirements
Hydro One Networks	Not included in submission.
Industrial Gas Users Association (IGUA)	<p>The IR Plan should require the public filing of detailed information on both a quarterly and an annual basis. These include:</p> <ul style="list-style-type: none"> (a) Income Summary; (b) Summary of Revenue by Class of Service; (c) Average Pipeline Rate Base; (d) Throughput Detail; (e) Payroll Statistics (including salaries, wages and employee benefits and the average number of employees); (f) Deferred Balances; (g) Performance Measures; and (h) Intercorporate Transactions
City of Kitchener	<ul style="list-style-type: none"> ▪ Actual ROE versus weather normalized ROE. ▪ Rate levels and trends – actual versus historic (exclude commodity). ▪ Actual cost of service expenses by major component versus plan. ▪ Disposition of capital assets.
LPMA	<ul style="list-style-type: none"> ▪ A detailed annual reporting requirement should be incorporated into the IR plan. In its simplest terms, the utility should file information equivalent to the historical year in a standard Cost of Service filing, including variance analyses from the previous historical year.
OPG	<ul style="list-style-type: none"> ▪ Service Quality Indices (SQIs): The incentive regulation plan may include SQIs to ensure that the utility is providing adequate, reliable, quality service. ▪ Financial Performance: The plan may include off-ramps and/or sharing mechanisms (e.g. earnings). Information necessary to determine whether an off-ramp is triggered, or the level of sharing dictated by the sharing mechanism should be provided. The frequency of filing of this information should be consistent with the requirements of the plan; therefore if an off-ramp or sharing mechanism is assessed annually then the reporting should be annual. If such parameters are not included in the plan, then provision of financial performance information creates unnecessary regulatory costs and inefficiencies. ▪ Annual Adjustments: The incentive regulation plan parameters may include provision for annual cost of capital or deferral/variance account adjustments. Information necessary to calculate the adjustment (e.g. rate base, long-term interest rates, financial spreads, etc.) should be provided on an annual basis. ▪ Research: Information to establish future incentive regulation parameters should be part of the record keeping requirements of utilities but should only be filed in the future if necessary. The

Stakeholder	Summary of Comments - Reporting Requirements
	OEB could direct utilities if necessary to perform studies based on its own data. The utilities should also be allowed to develop their own proposals on technical issues (e.g. total factor productivity) based on the detailed supporting documentation they maintain.
Schools Energy Coalition	<p>Goals for Reporting Requirements:</p> <ul style="list-style-type: none"> ▪ Prophylactic, ie. through transparency restrict the utility from engaging in activities that are either against the rules, or against the spirit of the rules. ▪ Communicative, ie. through transparency ensure that the ratepayers and the public see what is happening, and thus understand a) how much the utility is benefiting from the regulatory framework, and b) the nature and creativity of the efficiencies management is introducing to drive higher profits. <p>What should be filed:</p> <ul style="list-style-type: none"> ▪ Each year, the utility should file two base documents: a report on the activities and results of the previous year, and a budget and plan of activities for the current year (report should be extensive). ▪ Annually, the utility should file a report, in a pre-agreed format that sets out the specific steps taken to create efficiencies and drive profits, and the results achieved. ▪ In the first year, the Board should establish a type of interrogatories process for stakeholders to seek supplementary information. On the basis of those additional filings, the Board should revise the filing requirements for the following year, and so on.
Union Gas	Union is open to discussing the usefulness of an annual stakeholder review and discussion of actual financial and service quality results at the November 2 & 3 stakeholder meeting.
VECC	<ul style="list-style-type: none"> ▪ A reporting protocol should be agreed and be based on the current reporting requirements. ▪ As a minimum this should include the 6 regulatory financial schedules quarterly with variance explanations. ▪ In addition annual reports showing full financial results and explanations. Material changes in Capital, O&M and Affiliate Transactions should be reported. EBO 188 System Expansion reporting should continue.
Energy Probe	<ul style="list-style-type: none"> ▪ The reporting provisions should be thorough enough to identify any instances of unsustainable earnings management that might be employed by the utility to game the provisions of an IR program. ▪ In particular, the utility should have an onus to identify and explain any material changes in accounting or tax treatment, discontinuities in capital programs, affiliate transactions, or changes in corporate structure.